

25 March 2013

Dear Ms May

**THREE RIVERS DEVELOPMENT MANAGEMENT POLICIES LDD
Policy DM8**

Although the issue of water stress was discussed at the hearings I would appreciate your further comments on the submission by the Environment Agency dated 22 February.

Para. 10.10 of the supporting text and CS Policy CP8 both deal principally with infrastructure and the only place where the Council would be seen as promoting reduction in consumption would appear to be the proposed additional sentence to that end in para. 10.10. However, that is essentially a broad statement of intent and, given the acknowledged importance of water stress in Three Rivers District, it seems to me that the LDD could arguably be judged unsound if it failed to address it in policy terms.

The Environment Agency have suggested a policy of requiring new development to achieve water consumption of 105 litres per person per day (l/p/d) and have pointed to the South Bucks CS and the Dacorum CS as two plans that have included such a policy. The former has been adopted and, although the latter has recently been the subject of consultations on proposed modifications, none of those modifications appear to bear on the issue of water conservation.

The Environment Agency report the Council as "not keen on requiring developers to achieve water consumption levels below those required by building regulations". However, your approach to carbon dioxide emissions under Policy DM4 seems to set a precedent for this, albeit in that case one supported by the Planning and Energy Act 2008. The Water Cycle Scoping Study (2010) would appear to provide the evidential justification for the figure of 105 l/p/d; and that figure need not be "required" in the terms suggested by the Environment Agency. I note that South Bucks have used the words "should achieve" whilst Dacorum refer to the figure as a principle "normally....to be satisfied"; and advise developers to "plan to limit...water consumption".

I would welcome your response to these points. Could you please ensure that this letter (and my previous letter on Green Belt and development sites) are included on the Council's LDD examination web page together with your replies.

Yours sincerely

Robin Brooks