

From: Darl Sweetland <Anglian Water>
Subject: RE: Northampton Local Plan HRA - water efficiency standard
Date: 24 March 2022 at 10:58:57 GMT

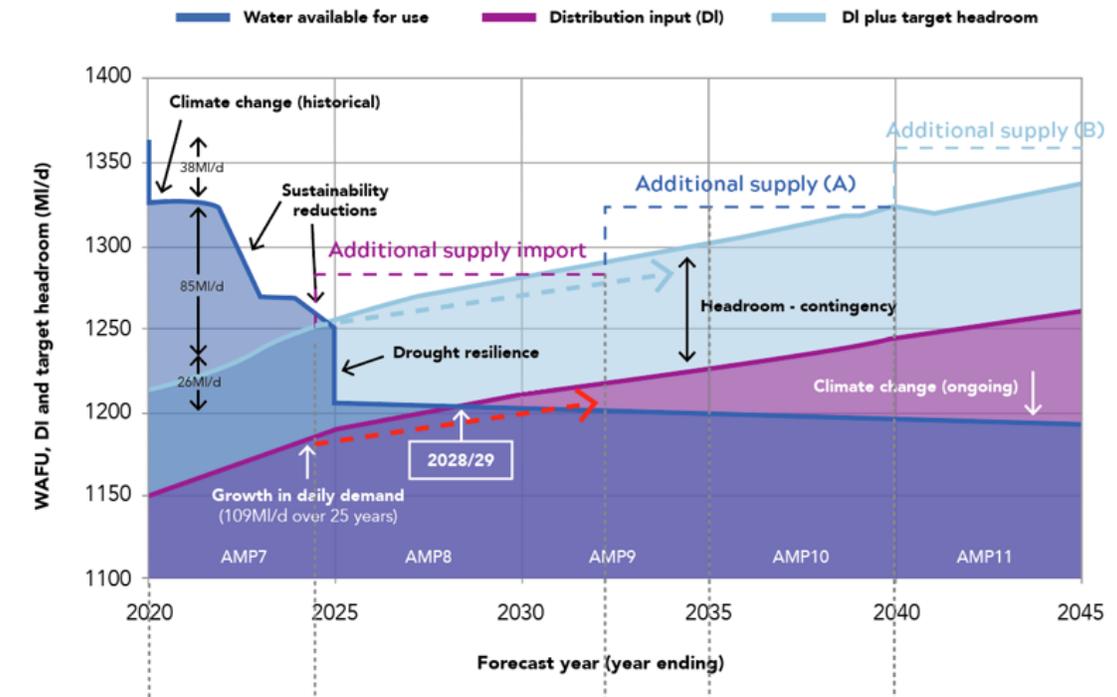
Good morning Noreen,

Can you confirm that the joint position statement with the Environment Agency and Natural England and the 2021 EA Water Stress classification have or will be presented by the Council to the Inspector? They aren't referred to in the question?

I note the Inspector's questions refer to a July 2020 document - Appendix 1 of the Council's document, Optional Higher Technical Standards July 2020 (06-03).

That is now somewhat dated and with reference to section 1.12 of Procedural Guide for Local Plan Examinations and the need for up to date evidence I can confirm the updated position is that set out below and in summary is:

- All of the Anglian Water region is classified as in serious water stress and this was confirmed by the EA in 2021
- The WRE Plan – link below – identifies a deficit in all areas without interventions and the plan to 2050 is based on a 110l/p/d target
- The 2019 WRMP shows that the Water Resource Zone (WRZ) in which Northampton is located is at risk of a supply – demand deficit in the plan period (more than 15 Ml/d by 2045) That level of deficit places Northampton in the worst categorisation of WRZ. That deficit is driven by population growth i.e. being caused by Plan and also climate change threats



- The graph above shows the supply demand balance deficit we are facing in all the Anglian region including North Northamptonshire. You can see the gap is very significant with demand growth being driven by population increase and supply reducing due to climate change. Northampton and the wider WRZ is not immune from the regional deficit
- The RBMP seeks a collective approach to reducing demand and valuing water and the environment across the whole RBMP area
- Government is currently consulting on a 20% reduction in water being in distribution by 2037 as part of the Environment Act. On its face a simple 20% reduction would mean that average household distribution/use would need to drop from 136 litres to 109 litres. Without a 110 litres policy the Plan could be read as saying new residents are allowed more water than existing residents
- The EA and NE statement seeks to ensure all Councils manage down demand to ensure that the need for carbon intensive new strategic infrastructure is minimised. Without that

reduction development elsewhere may be curtailed to protect environmental assets pushing unmet need into adjacent areas causing a domino effect on housing

- Anglian Water have sought policy wording supporting rainwater and grey water collection. These measures are needed to go beyond the 110l/p/d target whereas the move from 125litres to 110 litres as a minimal costs of tens of pounds per property.

On question 58, I have copied in Nicola & Kerrie at the EA and Justin & John at NE to advise the Council.

Finally, we would comment that it would be regrettable if Northampton had a less sustainable policy on water efficiency when so many other Councils have or are moving to and beyond a 110litre target to help new residents reduce their environmental impact and utility bills. The words of the Emma Howard Boyd, Chair of the Environment Agency at COP26 last year when speaking about water supply last year that we in the UK must 'adapt or die' show that we all have a part to play in adaptation to and mitigating the global climate crisis.



anglianwater

Darl Sweetland MRTPI

Spatial Planning Manager

[Redacted]

[Redacted]

[Redacted]

Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon,
Cambridgeshire, PE29 6XU



From: Noreen Banks <WNC>

EXTERNAL MAIL - Please be aware this mail is from an external sender - **THINK BEFORE YOU CLICK**

Good afternoon Darl

Please see below the extract from the Inspectors' question as well as the link to the post hearings letter:

Policy 5 Carbon reduction, community energy networks, sustainable design and construction, and water use

57. Policy 5 seeks to apply the optional water efficiency standard of 110 litres/person/day, rather than that set out in the Building Regulations of 125 litres/person/day. However, whilst there is evidence that the wider Anglian Water area is an area of serious water stress, there is not evidence to demonstrate that the plan area is experiencing serious water stress, nor that the Plan would cause that to occur³. In our view there is not sufficient justification to impose the

requirement on this basis.

58. We note the findings of the HRA that there will be no adverse effects on the SPA and Ramsar site as a result of changes to water supply and water level management. However, these are made on the assumption that the optional water efficiency standard is imposed. We would welcome your views on whether reverting to the Building Regulations 125 litres/person/day would lead to a different conclusion in the HRA, potentially requiring mitigation.

[EXAM 40 Inspectors Post Hearings Letter 24012022 | West Northamptonshire Council - Northampton Area](#)

If you have anything else that you would to add in response to the above, I would be grateful if you could let me know before lunchtime tomorrow.

Kind regards
Noreen

From: Darl Sweetland (Anglian Water)

Sent: 16 March 2022 15:12

Subject: RE: Northampton Local Plan HRA - water efficiency standard

Good afternoon Noreen,

Can you refer to the list at page 6 and then the map on page 8.

The Environment Agency classification is clear that with the exception of Hartlepool all areas served by Anglian Water and indeed the surrounding water company area are in serious water stress. The position has worsened since 2013.

I also attached the joint position from the EA and NE with Anglian Water on water efficiency.

Please provide the Inspector's question so that we may consider the point being asked.



anglianwater

Darl Sweetland MRTPI

Spatial Planning Manager

[REDACTED]

[REDACTED]

[REDACTED]

Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon,
Cambridgeshire, PE29 6XU



From: Noreen Banks WNC

EXTERNAL MAIL - Please be aware this mail is from an external sender - **THINK BEFORE YOU CLICK**

Good afternoon Darl

Before we proceed with this matter, I would be very grateful if you could confirm, as a matter of urgency, whether the Northampton area is located within a water stressed area. We have looked at the document you suggested. It has been suggested to us by the Inspectors that Northampton is not within a water stressed area but the wider Anglian Water area is.

We have a Local Plan meeting tomorrow and I need to let my Managers have the information by then. Please copy Paul Everard into your response.

Thank you.

Kind regards
Noreen

From: Darl Sweetland Anglian Water

Subject: RE: Northampton Local Plan HRA - water efficiency standard

Good afternoon Katherine,

- The Environment Agency have categorised the Anglian Region as an area of serious water stress.
<https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>
- The potential demand supply deficits are set out in the Water Resources East draft regional plan

<https://wre.org.uk/wp-content/uploads/2022/01/WRE-Emerging-Plan.pdf>

- All LPAs that I've been working with since joining Anglian Water last year recognise that they have a responsibility to future proof development by improving water efficiency standards for new homes.

To address your three points:

- The level of growth in Northampton by itself is unlikely to have a significant impact on Anglian Water's WRMP demand estimates if West Northants Council decided to go against Anglian Water and Environment Agency advice on water efficiency standards. As you correctly summarise though higher levels of demand enabled by having a less sustainable water efficiency policy would though be likely to have an incremental and cumulative impact on water resources and bodies. That impact could be on the water quality and/or ecological value of those water bodies. This is likely to be exacerbated by sustainability reductions from ground water abstraction sources increasing the importance of supplies from reservoirs including Rutland Water. A decision not to apply a policy seeking to reduce water demand would also have carbon impacts as the collection, transfer, treatment and distribution of water uses energy through pumping, for example. Additional water use in new homes would also flow through to the need for more waste water to be treated and managed. This is likely to place a greater environmental burden on water bodies where treated water is discharged. That increased volume of treatment and pumping also has climate change impacts.

- If all Councils took a decision not to improve the environmental performance of new homes then this would have a significant effect on the environment. Anglian Water has a statutory duty to ensure that supply meets demand. Not reducing demand in new homes in Northampton would require alternative interventions elsewhere. Those measures, including in existing homes, may be more costly and intrusive for customers and may

not be agreed by Ofwat. Alternative supply side interventions to address higher levels of demand in new homes in Northampton may require the use of resources or new sources such as desalination and water transfer which are likely to have higher environmental and carbon costs than the new homes water efficiency measures that cost tens of pounds per new home. Putting the burden of higher water efficiency or the need to provide supplies on other Council areas may be seen as contrary to the soundness test that Plans should be 'effective' including consideration of cross boundary matters addressed in the Water Resources East draft regional plan.

- The tests of soundness include the plan being 'justified' - essentially whether it is evidence based. The two links above provide evidence of an increased need for water efficiency since the Plan was submitted for Examination. Anglian Water's previous submissions and EA advice is that the water efficiency standard for new homes should be to reduce demand through proven low cost measures. The environmental, economic and social benefits of reducing demand including ecological status of water bodies, climate change resilience, reduced greenhouse gas emissions, lower costs for customers through reduced bills and a reduce need to fund investment could collectively result in the Plan's SEA – partly informed by an updated HRA – supporting a conclusion that the Northampton Local Plan is unsound. Water efficiency in isolation may not result in an unsound judgement. That said, if the Inspector looks at the NPPF requirement that Plans should 'support sustainable development', the alternative less sustainable water efficiency policy may, with other factors contribute to the Inspector reaching an overall unsound conclusion.

Anglian Water trusts that the above evidence links and summary illustrate the need for more sustainable water efficiency standards in the Northampton Local Plan.

Each Council's policy efforts, working with environmentally aware developers to reduce demand in new homes, reduces costs to the environment and society by closing future water demand supply deficits.



anglianwater

Darl Sweetland MRTPI

Spatial Planning Manager

[Redacted]

[Redacted]

[Redacted]

Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon,
Cambridgeshire, PE29 6XU

A yellow-bordered box containing text. On the top-left and bottom-right corners of the box are decorative water droplet icons in blue and yellow. The text inside the box reads: "Our Purpose" in purple, followed by "To bring environmental and social prosperity to the region we serve through our commitment to" in black, and "love every drop." in purple.

Our Purpose
To bring environmental and social prosperity to the region we serve through our commitment to
love every drop.

From: Katherine Sydney

EXTERNAL MAIL - Please be aware this mail is from an external sender - **THINK BEFORE YOU CLICK**

Hi Darl

Could you let me know whether you've had an opportunity to consider the queries below, please?

Many thanks,

Katherine

Katherine Sydney (she/her)
Associate Planner
BSc (Hons) MSc PIEMA

I usually work Monday to Thursday, finishing at 2:30pm on some days



[News](#) | [Insights](#) | [Brochure](#)

See our [office locations](#)
An Employee-Owned Company
GDPR

We take your data seriously! [read our privacy notice](#) | [unsubscribe](#)

LUC (Land Use Consultants Limited)
is registered in England (Registered Number 2549296)
Registered Office: 250 Waterloo Road, London SE1 8RD.

From: Katherine Sydney

Sent: 16 February 2022 15:17

Subject: FW: Northampton Local Plan HRA - water efficiency

standard

Darl,

Apologies – I send this to Stewart Patience but understand he's left Anglian Water.

Katherine

From: Katherine Sydney

Sent: 16 February 2022 15:05

Subject: Northampton Local Plan HRA - water efficiency standard

Hi Stewart

We've been assisting West Northamptonshire Council with the Habitats Regulations Assessment (HRA) of the Northampton Local Plan and have some queries for Anglian Water.

Following the Local Plan Examination, the Council is considering altering the water efficiency standard in Policy 5 from 110l/p/day to 125l/p/day; we'd like to understand the HRA implications of that.

The HRA of the Northampton Local Plan (Part 2; Reg19 2nd round of consultation) identified potential effects on Rutland Water SPA/Ramsar and the Upper Nene Valley Gravel Pits SPA/Ramsar (both within Ruthamford North resource zone). This is related to an increased requirement for water abstraction and the potential effects on water levels at the two European sites, from new housing proposed in the Local Plan. The HRA concluded that, with mitigation, there would be no significant effects on either site. Mitigation included measures set out in Anglian Water's WRMP 2019 and a commitment within the Local Plan to a water efficiency standard of 110l/p/day (as previously requested by Anglian Water in response to the Reg19 1st round consultation).

As 110l/p/day is supported by Anglian Water, we would like to understand whether, if the water efficiency standard in the Local Plan were changed to the Building Regulations standard of 125l/p/day:

- Would that alter the future demand estimates within the WRMP that are based on expected growth?
- Would Anglian Water still consider that it would be possible to

ensure that water supply exceeds demand, without significant effects on the environment?

- Would Anglian Water consider the Plan to be sound?

Many thanks,

Katherine