

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Northampton Local Plan HRA - water efficiency standard
Date: 16 March 2022 15:14:23
Attachments: [REDACTED]

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.

Darl Sweetland MRTPI

Spatial Planning Manager

Mobile: [REDACTED]

Web: www.anglianwater.co.uk

Anglian Water Services Limited

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



From: Noreen Banks [REDACTED]

Sent: 16 March 2022 14:46

To: Darl Sweetland [REDACTED]
Cc: [REDACTED]
Subject: RE: Northampton Local Plan HRA - water efficiency standard
Importance: High

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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 [REDACTED]
Sent: 02 March 2022 18:10
To: Katherine Sydney [REDACTED] >
Cc: [REDACTED]

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.

Darl Sweetland MRTPI

Spatial Planning Manager

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From: Katherine Sydney <[REDACTED]>

Sent: 02 March 2022 16:02

To: Darl Sweetland <[REDACTED]>

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

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Hi Darl

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

Many thanks,

Katherine

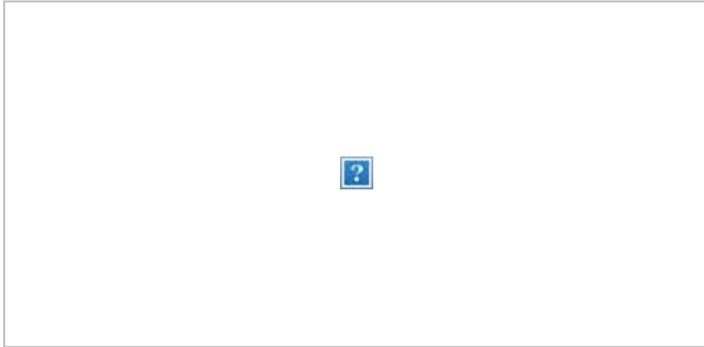


Katherine Sydney (she/her)
Associate Planner

BSc (Hons) MSc PIEMA

T [REDACTED] | D [REDACTED]

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



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Registered Office: 250 Waterloo Road, London SE1 8RD.

From: Katherine Sydney

Sent: 16 February 2022 15:17

To: [REDACTED]

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

Darl,

Apologies – I send this to [REDACTED] but understand he's left Anglian Water.

Katherine

From: Katherine Sydney

Sent: 16 February 2022 15:05

To: [REDACTED] [REDACTED]

Cc: [REDACTED]

[REDACTED]

Subject: Northampton Local Plan HRA - water efficiency standard

Hi [REDACTED]

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

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Joint advice to Local Planning Authorities: Optional Higher Water efficiency standard for new housing (January 2019 updated February 2020)

Anglian Water, Environment Agency and Natural England

All new homes have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out [Local Plan](#) policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.

The National Planning Policy Framework policies expects local planning authorities to adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. The local planning authority can consider whether a tighter water efficiency requirement for new homes is justified to help manage demand.

This joint statement has been produced to set out the common position of Anglian Water, the Environment Agency and Natural England on the inclusion of this optional standard in Local Plans within the Anglian Water company area.

Context

The Anglian Water region is particularly vulnerable to the impacts of climate change: temperature rise, the potential reduction in summer rainfall, lower available water resources, increased flood risk and rising sea levels. Eastern England is the driest region in the UK, receiving only around 600 millimetres rainfall per annum, around two-thirds of the average for England and Wales¹. The ecological sensitivity of many of the wetland sites in the east of England adds a further challenge where there are environmental drivers for abstraction reductions.

Together with this sensitivity the growth in population, housing and the economy will put increasing demand on water and wastewater services. Securing sustainable supplies will demand substantial improvements in the efficiency of water usage by Anglian Water and by Anglian Water's customers.

Establishing a clear need

To include the optional higher target, national guidance states that it will be for a local planning authority to establish a clear need based on:

- existing sources of evidence
- locally specific evidence including water cycle studies.
- consultations with the local water and sewerage company, the Environment Agency and catchment partnerships.
- consideration of the impact on viability and housing supply of such a requirement.

See [paragraph 013 of the Housing: optional technical standards](#)

¹ Anglian Water Strategic Statement

Is there a local need in the Anglian Water company area?

The Environment Agency 'Water Stressed Areas Final Classification (2013)'² is a primary source of evidence which supports a tighter water efficiency standard. It identifies areas of serious water stress where household demand for water is (or likely to be) a high proportion of the current effective rainfall available to meet that demand.

The Environment Agency advises the Secretary of State that the areas classified as 'Serious' in the final classification table should be designated as 'Areas of serious water stress'.

The Anglian Water region is identified as an area of serious water stress. This means that if you are serviced by Anglian Water the area is considered to be at serious water stress. In our view, this provides evidence to suggest that the optional higher water efficiency standard should be applied to help manage this stress.

In addition, Anglian Water's Water Resource Management Plan 2019³ identifies how Anglian Water will manage the supply and demand balance over the next 25 years. It shows what demand and supply measures will be introduced to manage the longer term challenge of population increase, climate change, drought resilience and growing environmental needs. It is currently forecasted that our average supply-demand balance will be 249MI/d by 2045. In response, reducing the levels of consumption will help to counteract the reduction in resource availability as well as other proactive alterations.

Viability

The Local Planning Authority should consider viability taking account of local circumstances and policy requirements, but research has shown that the cost of the optional higher water efficiency standard and associated cost can be as low as £6-9⁴ per dwelling. We therefore consider that this does not make Local Plans, or individual development proposals, unviable.

Recommended Wording

In areas where Anglian Water is the water undertaker in the area, we recommend that the following wording is included in appropriate Local Plan policies, and implemented through of planning conditions, as set out in Building Regulations.

"Development proposals should demonstrate:

Dwellings meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in building regulations part G2."

Where more than one water company serve the area the local planning authority should contact the water company and consider specific wording for the respective boundaries. This is appropriate because despite close geographical proximity, areas may have their water resources from outside the local area.

² <https://www.gov.uk/government/publications/water-stressed-areas-2013-classification>

³ <http://www.anglianwater.co.uk/environment/our-commitment/our-plans/water-resource-management.aspx>

⁴ [The Housing Standards Review Cost Impact report \(2014\)](#) prepared for DCLG advises that the cost of introducing such a standard would be between £6-£9 per dwelling.