

Lichfields for Shoo 22 Ltd – Additional Policy 5 Response following submission of EXAM42-44

We wish to submit the below comments to the Inspectors on behalf of Shoo 22 Limited who provided initial representations on draft Policy 5 through the Draft Submission Consultation Round 2 (September 2020).

Broadly, we consider the liaison with Anglian Water (AW), and associated evidence presented, remains unclear and still fails to sufficiently demonstrate there is a clear need for the tighter optional requirement. We therefore request further clarity in terms of the evidence presented by the Council and AW.

The Planning Practice Guidance confirms that the tighter optional requirement can be set out through local plan policies “*where there is clear local need*” (PPG ID: 56-014-20150327) and later outlines:

“Primary sources of evidence which might support a tighter water efficiency standard for new dwellings are:

- *The Environment Agency water stressed areas 2021 classification which identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.*
- *Water resource management plans produced by water companies.*
- *River Basin Management Plans which describe the river basin district and the pressure that the water environment faces. These include information on where water resources are contributing to a water body being classified as ‘at risk’ or ‘probably at risk’ of failing to achieve good ecological status, due to low flows or reduced water availability.*

In addition to these primary data sources, locally specific evidence may also be available, for example collaborative ‘water cycle studies’ may have been carried out in areas of high growth.” (PPG ID: 56-016-20150327)

Having reviewed the information provided by AW and the Council, we consider that insufficient evidence at the local level has been presented to demonstrate the clear local need. Whilst AW has provided the Environment Agency’s “*Water stressed areas – final classification 2021*” (1 July 2021), this only confirms that “*Anglian Water – East Anglia*” is in an area of serious water stress, potentially suggesting that the Northampton area does not fall within this classification. Additionally, we note the Inspectors’ comments in the Post Hearings Letter (Ref: EXAM 40) which questions whether there is sufficient evidence demonstrating that the NLP2 would cause serious water stress and, in this regard, note that AW have not provided specific comment on the impact of the NLP2 on water stress but rather have only presented generalised assumptions.

We trust the above will be taken in to consideration by the Inspectors and please do let me know should you require anything further.

Kind regards

Harry Plotnek
Senior Planner
Lichfields,