



**East Cambridgeshire Local Plan
Examination**

**MATTER 8: Flood risk and water
management (LP23 and LP25)**

Written Statement

Anglian Water Services Ltd

August 2018

26 Is the application of the Optional Technical Housing Standard for water efficiency justified and consistent with national policy?

All new dwellings 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 expect 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.

To include the optional higher target, national planning practice 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.

Existing sources of evidence

The main source of information for establishing need is the Environment Agency 'Water Stressed Areas Final Classification (2013)¹, which 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.

In addition, Anglian Water's Water Resource Management Plan 2015² identifies how we 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 and growing environmental needs. It is currently forecasted that our average supply-demand balance will reduce by 249MI/d. In response, reducing the levels of consumption will help to counteract the low levels of resources as well as other proactive alterations.

¹ <https://www.gov.uk/government/publications/water-stressed-areas-2013-classification>

² <http://www.anglianwater.co.uk/environment/our-commitment/our-plans/water-resource-management.aspx>

Consultations with the local water and sewerage company and the Environment Agency

Anglian Water and the Environment Agency are both of the view that there is sufficient evidence to justify the inclusion of the optional higher water efficiency standard in the East Cambridgeshire Local Plan.

Viability

Local Planning Authorities are required to consider viability taking account of local circumstances and policy requirements but Government research has shown that the cost of the optional higher water efficiency standard and associated cost can be as low as £6-9³ per dwelling. We therefore consider that this does not make the East Cambridgeshire Local Plan, or individual development proposals, unviable.

27. To what extent is Policy LP25 effective and realistic in mitigating, and mitigating against flood risk, including the use of Sustainable Urban Drainage systems?

Anglian Water is supportive of Policy LP25 for the reasons given in our consultation response to the Proposed Submission Local Plan.

We consider Policy LP25 as currently drafted is an effective policy for mitigating the risk of flooding relating to new development within the district including water recycling infrastructure and the provision of Sustainable Drainage Systems (SuDS) as the preferred method of surface water disposal for new development.

28. Is Policy LP25 based on up-to-date evidence and worded in such a way as to be effective and both internally, and regionally consistent? How has the Water Cycle Study influenced the policies and strategy of the Plan and what is the implication of the recently produced Addendum to the Water Cycle Study (PE17A) on the wording of the policies?

Anglian Water is supportive of Policy LP25 for the reasons given in our consultation response to the Proposed Submission Local Plan.

³ [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.

We consider that changes to the wording of Policy LP25 are not required to take account of the Addendum to the Water Cycle Study (PE17A) as the policy as drafted already requires applicants to demonstrate that there is capacity both within the foul sewerage network and at the receiving Water Recycling Centre in time to serve developments which are proposed within the district. As the plan is intended to be read as a whole we consider that Policy LP25 provides sufficient guidance for both applicants and East Cambridgeshire District Council as decision maker in relation to foul drainage and sewage treatment.