Local Plan for the Broads

90 litres per head per day water usage

Topic Paper

January 2026

Contents

1. Introduction

The Local Plan for the Broads Regulation 19 version includes Policy PUBDM7 Water efficiency and re-use. This policy includes a standard for new dwellings to be built to 110 litres per head per day (l/h/d) water use.

As part of the consultation on the Regulation 19 version of the Local Plan, objections were received with proposed amendments seeking 90l/h/d. The objections can be found at Appendix 1.

The Topic Paper has been produced in liaison with Anglian Water Services, Essex and Suffolk Water and the Environment Agency.

It seeks to justify amending PUBDM7 to replace 110l/h/d water use standard with 90l/h/d.

2. Current standards

Minimum water efficiency standards were introduced by the Government into the Building Regulations in 2010. The provisions require that all new homes are built so that their calculated water use is no more than 125 l/p/d (Regulation 36 Building Regulations 2010 and Part G of Schedule 1). Water use is calculated, and compliance is demonstrated by using the methodology set out in the Water Efficiency Calculator for New Dwellings ("the Water Calculator, Part G2 Approved Documents"), as well as the fittings-based approach.

An optional requirement (optional technical standard) also exists, of 110 l/p/d, in areas of water stress. This enables local planning authorities, where there is water stress, to impose a tighter standard for new development through a condition on the granting of planning permission, effectively requiring additional water efficiency (for example, more efficient taps and showers).

The adopted Local Plan for the Broads 2019 includes the optional technical standard. The emerging Local Plan for the Broads (Regulation 19 version, December 2025) also includes the optional technical standard.

3. Recent Government consultation

Review of Water Efficiency Standards in the Building Regulations 2010 - Defra - Citizen Space consultation ran between 23 September 2025 and 16 December 2025. This public consultation included an option to revise the minimum Water Efficiency Standard in new houses through fittings from 125 l/p/d to 105 l/p/d, and the optional technical standard from 110 l/p/d to 100 l/p/d. It included a call for evidence on water reuse systems in new developments, to enable even greater water efficiency.

4. Why go beyond the current building regulations for water usage?

The entire eastern England region is classified as seriously water stressed. It is the driest area in England receiving only around 600mm annual rainfall which is around two-thirds of the average for England and Wales. The region faces a supply demand deficit of 730 million litres/day by 2050 with half of this deficit needing to be met through demand management, including water efficiency. In some cases, required sustainability changes may not be possible for the water company to accommodate without compromising supplies to existing customers and/or growth. Water companies can make an overriding public interest case to defer the licence changes under Regulation 19 of the Water Environment (Water Framework Directive) Regulations 2017. A water company's need to defer licence changes is an indicator that abstraction could cause environmental deterioration, and this is a relevant planning consideration under Regulation 33 of the Water Environment (Water Framework Directive) Regulations 2017. The Norwich and the Broads WRZ has been identified as an area where a regulation 19 exemption will apply.

The following summarises the Shared Standards document (see Section 5 for more details).

The Government's 2024 consultation on planning policy noted there is a growing gap in our water supplies that will rise to circa five billion litres a day by 2050 if no further action is taken above existing measures (from 2025 onwards). A summary of England's revised draft regional and water resources management plans — GOV.UK by the Environment Agency identified that the gap between supply and demand is increasing with the challenges of climate change, population growth, drought resilience and increasing environmental protection requiring more water to be available. It also highlighted that Water Resource Management Plans (WRMP) rely on ambitious demand management, including water efficiency, is to address approximately half (48%) of this forecasted deficit.

The area's reliance on strategic transfers shows that water resources will be increasingly redistributed across the region in the future. This, combined with increasing pressure of growth and climate change, means there is a strong case for high levels of water efficiency across the region.

The Shared Standards area covers two main Natural England Area Teams; Norfolk, Suffolk, and West Anglia. Within these teams, inside the Shared Standards area, there are 239 Sites of Special Scientific Interest (SSSIs) which have water dependent features. This includes 20 National Nature Reserves, 11 Special Areas of Conservation, 11 Special Protection Areas and 13 Ramsar sites. Of the 239 SSSIs, 96 at time of writing, have water abstraction identified as an active pressure. Many have measures in place to address these pressures linked in many cases to the plan-led approach (see section B2). The Shared Standards complement or support the delivery of those measures.

The Written Ministerial Statement (WMS) in 2023 'The Next Stage in Our Long-Term Plan for Housing Update' encourages LPAs to set more stringent standards in Local Plans and in planning permissions 'in areas of serious water stress, where water scarcity is inhibiting the adoption of Local Plans or the granting of planning permission for homes'

5. Shared Standards

These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, to support Local Planning Authorities (LPAs) to deliver sustainable growth in this area. It has the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England.

The Shared Standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery.

The Shared Standards recommend that LPAs include Local Plan policies that:

- Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of 85-95 litres/person/day (l/p/d) for residential developments is feasible. Annex C provides information on this.
- Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator.
- Require new, for major non-domestic developments to include water saving measures and water reuse in their designs.

6. Other examples of Local Plan policies going beyond the optional building regulations

The following tables sets out what some other Local Plans are doing regarding water use of new dwellings.

Local Plan	Policy requirement	Local Plan progress	Further information
Chelmsford Local plan	POLICY DM25 – SUSTAINABLE BUILDINGS: The Council will expect all new buildings to incorporate sustainable design features to reduce carbon dioxide and nitrogen dioxide emissions, and the use of natural resources, as follows: A) Water efficiency All new dwellings are required to: Achieve a water efficiency standard of 90 litres/person/day	Regulation 19 pre-submission consultation held	Pre Submission Consultation 2025
Castle Point Local Plan	Policy SD9 – Water Supply and Waste Water 1. All new residential developments will be required to achieve a water efficiency standard of 90 litres per person per day. Where it can be demonstrated that this is not feasible part G2 and regulation 36(2)(b) of the Buildings Regulations will apply.	Regulation 19 pre-submission consultation held	castle-point-plan-regulation-19-consultation-july-2025.pdf
Huntingdonshire Local Plan	Draft Policy LP 16 Water Efficiency: A proposal for new residential development will be supported where it can demonstrate that it is designed to utilise no more than 90 litres per person per day of mains supplied/ potable water.	Regulation 18 Preferred Options consultation underway	Preferred Options Draft Local Plan to 2046
Uttlesford Local Plan	Policy CP34 Amend the second sentence of the second paragraph (water efficiency) as follows: All new residential development ~~that achieves~~ **should achieve** at least a water efficiency standard of 90 litres per person ~~per day will be supported~~.	Examination / Main Modifications consultation held	MM24: 2025-09-15-ulp-schedule-of-main-modifications-to-the-submission-plan.pdf
Milton Keynes Local Plan	Policy CEA5 Water efficiency: Proposals for residential development must achieve using a fixtures and fittings approach, unless superseded by a more stringent national policy or Building Regulations requirement, a 93 litres per person per day water efficiency standard for mains supplied water/potable water.	Reg 19 (proposed submission) consultation	MK City Plan 2050 FINAL VERSION (Regulation 19) - version to print and publish.pdf

Local Plan	Policy requirement	Local Plan progress	Further information
Greater Cambridge Local Plan	Policy CC/WE - Water efficiency in new developments: All development proposals (with the exception of householder applications) must demonstrate that there will be an adequate water supply available to serve the development. Where development is being phased, each phase must demonstrate sufficient water supply and the provision of the necessary infrastructure prior to occupation of that phase of development. For residential development of 100 or more dwellings, water usage of no more than80 litres/person/day is required. For less than 100 dwellings a range between 90 & 100 litres/person/day.	Reg 18 consultation underway	Greater Cambridge Local Plan Parts 1-2 & Greater Cambridge Local Plan Parts 4-10
Colchester Local Plan	Policy NZ3: Wastewater and Water Supply: To achieve greater water efficiencies and support demand management, all new buildings must include water efficiency measures. Residential development will be required to meet the water efficiency standard of 80 litres per person per day. Proposals should submit a water efficiency calculator report to demonstrate compliance and include clear evidence on the approach to water conservation.	Reg 18 (preferred options) consultation underway	Colchester City Council - Colchester City Council Preferred Options Local Plan Regulation 18 Consultation 2025
Breckland Local Plan	Policy HOU 17: Water efficiency: All development will demonstrate water efficient design. This is to be achieved by ensuring that: a) New residential development is designed to utilise no more than 85 litres per person per day of mains supplied water / potable water per person per day (l/p/d). b) New, extended or redeveloped non-household* buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAM.	Reg 18 consultation (Preferred Options)	Breckland Local Plan (Regulation 18)

7. Proposed amendments to the Regulation 19 Local Plan policy

It has been proposed by Anglian Water Services, Essex & Suffolk Water and the Environment Agency that policy PUBDM7: Water efficiency and re-use be amended to change 110l/h/d to 90l/h/d: All new residential developments will be required to achieve a water efficiency standard of 90 litres per person per day.

The supporting text would then be amended to explain what would be needed as part of a planning application:

- The 2023 Written Ministerial Statement (WMS) urges local planning authorities in seriously water-stressed areas to adopt stricter water standards in Local Plans and planning permissions. This updates the 2015 WMS, which previously prohibited requiring tighter water efficiency standards than those in the Building Regulations 2010.
- The tighter standard of 90 litres/person/day is in line with the Government's Environment Improvement Plan and Plan for Water and would be controlled by means of a planning condition.
- The applicant will need to submit information to show the water fixtures and fittings they will use to meet 90 l/h/d.
- This water calculator needs to be used and submitted with an application: Calculator - Unified Water Calculator[1].

Please see amendments to the policy at Appendix 2.

8. Example conditions

A condition will be applied that will require the water use of the fixtures and fittings to be as per that stated in the water calculator submitted as part of the planning application.

The applicant will also need to send in the correspondence with either Anglian Water or Essex and Suffolk Water to demonstrate they had been successful in obtaining the Environmental Incentive (see next section).

If the applicant has decided against the Environmental Incentive approach, they will be required to send in sufficient evidence to demonstrate compliance with the 90l/h/d standard.

[1] The online water calculator table is based on the water efficiency calculator in Part G of Building Regulations - see Appendix A Table A1 Approved Document G: Sanitation, hot water safety and water efficiency

9. Delivery and implementation

Anglian Water currently offers a Water Environmental Incentive Scheme of £500 per property to achieve 90 l/p/d; this environmental incentive can be found here. If the application for details and fittings meet the criteria to meet 90 l/p/d Anglian Water will undertake site audits post construction and pre-occupation - by scheduling a visit by one of their Development Service Technicians to visit the site and complete an audit - once this is passed, then a payment of the incentive amount will be paid as a credit against the infrastructure charge. The applicant would need to send in the correspondence to demonstrate they had been successful in obtaining the Environmental Incentive.

Essex & Suffolk Water's current developer charges are here: Developer services charges. Household properties may be eligible for a 100% discount against the infrastructure charge if it meets our criteria, set out in accordance with OFWAT's Environmental Incentives Common Framework. This is designed to encourage new developments to achieve more water-efficiency standards and encourage sustainability. Developers must demonstrate that the properties have been fitted to achieve a consumption of no more than 100 litres per person per day[2] and that installed fittings do not exceed the maximum consumption set out in the below column under 'Common Environmental Incentive'. ESW may audit a sample of properties to verify that submitted information matches the fittings installed at the property. The applicant would need to send in the correspondence to demonstrate they had been successful in obtaining the Environmental Incentive.

10. Viability of 90 litres per head per day

We asked the Local Plan viability consultants to assess the impact of 90l/h/d water usage on viability. They conclude that: *The impact of the additional cost involved in moving to water demand equivalent to 90 litres per head per day has minimal impact on viability. The results of the sensitivity testing do not change any of the conclusions set out in chapter 7 of the Local Plan Viability Assessment.*

The assessment of 90l/h/d can be found at Appendix 3.

Annex C of the Shared Standards discusses the issue of viability and the cost impact of going beyond 110l/h/d water use and this generally matches the assessment of the viability consultants.

[2] Essex & Suffolk Water are currently working on new environmental discounts, and they will be in place at the beginning of next year for implementation in the new financial year (April 2026).

Appendix 1: Comments received as part of the first Regulation 19 consultation

Comment received Anglian Water Services, Essex & Suffolk Water and Environment Agency in relation to PUBDM7:

Anglian Water considers the policy is SOUND in principle, however, with the publication of the Shared Standards for Water Efficiency in Local Plans, we are now advising local planning authorities to introduce tighter water efficiency standards using the evidenced approach. Given The Broads Local Plan is at an advanced stage, we are mindful that the Shared Standards represents a step change, but the Shared Standards would provide the evidence required to support the policy specification "any higher standards established ... locally".

The Shared Standards for Water Efficiency in Local Plans was published in June 2025. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery.

We recommend that LPAs include Local Plan Policies that:

- Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible.
- Require new, extended or redeveloped non-domestic1 development to aim to achieve full credits in the BREEAM water calculator.
- Require new major non-domestic developments to include water saving measures and water reuse in their design.

These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy. It is considered that a modification to Policy PUBDM7 can help make development in The Broads more water efficient and allow sustainable growth, whilst

longer term water supply solutions are being developed/implemented. As well as managing risks to the environment, tighter water efficiency measures may also reduce the need for water companies to restrict supply for non-domestic growth, alongside other initiatives.

It is recognised that the Broads Local Plan is at an advanced stage in its preparation, but this consultation provides an opportunity to include a tighter water efficiency standard that can be justified by evidence set out in the annexes supporting Shared Standards. The evidence is extensive and demonstrates, inter alia, that:

- The Water Resource Management Plans (WRMPs), prepared by water companies, in the Shared Standards area demonstrate that a there are significant challenges in meeting predicted domestic and non-domestic growth in water demand whilst also meeting statutory environmental obligations. There are non-domestic water restrictions in both Anglian Water and Essex & Suffolk Water areas which are referenced in the supporting text to Policy PUBDM7.
- Water efficiency is needed for protected sites and wider nature recovery. Of the 239 SSSIs in the Shared Standards area, 96 at time of writing, have water abstraction identified as an active pressure. Many have measures in place to address these pressures linked in many cases to the plan-led approach. The Shared Standards complement or support the delivery of those measures. The Norwich and the Broads water resource zone (WRZ) is identified as one of the WRZs with deterioration risk as a result of abstraction pressures.
- At present it is feasible to achieve a total consumption of 85 l/p/d by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost. In addition, water companies offer incentives to developers to build water efficient homes. These are tied into water company Business Plans that are published every five years, with the latest being published in 2025 alongside WRMPs. For example, Anglian Water offer a £500 incentive for residential properties that achieve a water efficiency standard of 90 l/p/d which would be within the shared standards water efficiency parameters of 85-95 l/p/d suggested for Local Plan policies. These incentives can support the viability of delivering water efficiency measures.

Based on the Shared Standards introducing a ‘locally established water efficiency standard’, Policy PUBDM7 could be modified to reflect the recommendations in the Shared Standards. Whilst the overall level of development in The Broads is low, it is considered the evidence set out in the Shared Standards is clear that tighter water efficiency standards are necessary for sustainable growth and nature recovery, which supports the National Park purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Parks, and the long term vision and fundamental principles for the Broads National Park in the Broads Plan 2022-2027.

Appendix 2: Amendments to Local Plan policy

It is proposed that the policy as amended as follows. This reflects all comments made on PUBDM7.

Policy PUBDM7: Water efficiency and re-use

1. All new/replacement/converted dwellings (including holiday/visitor accommodation and residential ancillary accommodation) will be designed to have a water demand equivalent to ~~110~~ 90 litres per head per day of mains supplied potable water or any tighter water efficiency ~~higher~~ standard subsequently established nationally through Building Regulations ~~or locally~~. Measures to reduce water demand further will be encouraged and supported. If 90l/h/d is proven as not viable or practicable, then a standard between 90l/h/d and 110l/h/d is expected.
2. All new/replacement/converted or extended buildings are required to incorporate greywater recycling[3] and rainwater harvesting[4] unless it is not feasible to do so.
3. Washing up provision and toilets and showers associated with camping, caravanning and glamping sites are required to be designed to ~~be~~ include water efficient fittings.
4. All new/replacement/converted non-domestic buildings are required to be designed to be water efficient. Policy PUBDM55 may be of relevance.
5. Planning applications need to include sufficient detail as to the intended standard and set out the measures to be incorporated to enable compliance. A Water Efficient Design Statement must be submitted with the application at the earliest stage to demonstrate how policy requirements have been met and will be maintained in relation to water efficient design. The statement shall provide, as a minimum, the following:

a) Baseline information relating to existing water use within a development site; and
b) Full calculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings, rainwater/stormwater harvesting and reuse, or greywater recycling).

6. Prior to the first occupation of development a completion certificate shall be submitted to the Local Planning Authority confirming the design standard under part 1 has been verified and fully implemented.

Reasoned Justification

All new homes must meet the mandatory national standard set out in the Building Regulations (125 litres/person/day). The NPPG says '*Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the*

[3] Greywater recycling is the appropriate collection, treatment and storage of wastewater discharged from kitchens (tap water or dishwasher water), baths or showers, to meet a non-potable water demand in the building, such as toilet flushing, washing machine cycles, outside tap or other non-potable water-compatible use.

[4] Rainwater harvesting systems are the appropriate collection and storage of rainwater run-off from hard outdoor surfaces (e.g. roofs) to meet a non-potable water demand in the building or garden, such as toilet flushing, washing machine cycles, outside tap/watering plants or other non-potable water-compatible use. Rainwater harvesting may also be possible to design into a site's sustainable drainage system (SuDS) (see the policy on surface water run-off).

tighter Building Regulations optional requirement of 110 litres/person/day'[5]*.* This is noted and was the standard in the 2019 Local Plan for the Broad. But this ~~The~~ policy seeks ~~110~~ 90l/h/d (litres per head per day) and the reasons for this are set out in the ~~Local Infrastructure Study~~ Water usage 90l/h/d Topic Paper (2025) and summarised below[6].

The Water Stressed Areas Classification (Environment Agency, 2021)[7] summary table shows that the areas of Essex & Suffolk Water and Anglian Water are water stressed.

The 2023 Written Ministerial Statement (WMS) urges local planning authorities in seriously water-stressed areas to adopt stricter water standards in Local Plans and planning permissions. This updates the 2015 WMS, which previously prohibited requiring tighter water efficiency standards than those in the Building Regulations 2010.

The tighter standard of 90 litres/person/day is in line with the Government's Environment Improvement Plan and Plan for Water. *<<the emerging NPPF (PM13 b ii) refers to 'or exceptionally a more stringent local standard in areas of serious water stress' and this could be referred to in the final policy>>*

There is clear support from Anglian Water and Essex and Suffolk Water in adopting this water efficiency and re-use approach. Demand management, such as reducing leakage, and encouraging customers to use less water is an important component of Water Resource Management Plans and helps to ensure that there will be sufficient water resources for future population growth, coping with the impacts of climate change, and to ensure a healthy and flourishing environment.

Anglian Water have advised that they can no longer guarantee to supply non-domestic water requirements for intensive/high water consumptive uses such as manufacturing/ food processing and production, due to water supply being squeezed by abstraction reduction, climate change and a fast-growing population. Therefore, where new and unplanned non-domestic requests are received, which exceed 20,000 litres per day (0.020 Ml/d) (this may be less, dependent on the availability of water in that area) Anglian Water will need to decline the request for more water in order to protect existing supplies and the environment. Their regulatory position means they are unable to supply new non-domestic demands if this jeopardises domestic supplies for existing and new residential customers and businesses.

[5] The 'optional' enhanced national standard is defined within the 2015 Approved Document G, Building Regulations 'Sanitation, hot water safety and water efficiency' March 2015, page 15, G2(3). At 2015 this is defined as consumption 110 litres per person per day to be demonstrated Sanitation, hot water safety and water efficiency: Approved Document G - GOV.UK (www.gov.uk)

[6] ~~Broads Local Plan: Local Infrastructure Study (pdf | broads-authority.gov.uk)~~ xxxxxx

[7] Water stressed areas – 2021 classification - GOV.UK (www.gov.uk)

Similarly, Essex & Suffolk Water also advise that businesses should not assume that Essex & Suffolk Water can met all new non-domestic water demand in the Blyth or Northern Central Water Resource Zones.

Delivery and implementation of the policy

If Government policy or legislation relating to water use of dwellings becomes more stringent, or at significant variance with above, after the adoption of this plan, the most stringent standard will be adopted.

The applicant should contact the relevant water company to find out if they require a water resources assessment for new non-domestic supplies and if they offer environmental incentive schemes to fund water efficiency measures in new developments.

As part of the planning application, the applicant will need to submit information to show the water fixtures and fittings they will use to meet 90 l/h/d. This water calculator needs to be used and submitted with an application: Calculator - Unified Water Calculator[8].

The 90l/h/d standard will be controlled through a planning condition. A condition will be applied that will require the water use of the fixtures and fittings to be as per that stated in the water calculator submitted as part of the planning application. The applicant will also need to send in the correspondence with either Anglian Water or Essex and Suffolk Water to demonstrate they had been successful in obtaining the Environmental Incentive[9]. If the applicant has decided against the Environmental Incentive approach, they will be required to send in sufficient evidence to demonstrate compliance with the 90l/h/d standard.

New development needs to incorporate measures to minimise water consumption. Water management systems, including grey water recycling and rainwater harvesting, should be incorporated into new development unless proven unfeasible.

The Authority will consider site constraints, technical restrictions, financial viability, and the delivery of additional benefits to the Broads where requirements of the policy cannot be

[8] The online water calculator table is based on the water efficiency calculator in Part G of Building Regulations - see Appendix A Table A1 Approved Document G: Sanitation, hot water safety and water efficiency

[9] **Anglian Water** currently offers a Water Environmental Incentive Scheme of £500 per property to achieve 90 l/p/d; this environmental incentive can be found here. If the application for details and fittings meet the criteria to meet 90 l/p/d Anglian Water will undertake site audits post construction and pre-occupation - by scheduling a visit by one of their Development Service Technicians to visit the site and complete an audit - once this is passed, then a payment of the incentive amount will be paid as a credit against the infrastructure charge. The applicant would need to send in the correspondence to demonstrate they had been successful in obtaining the Environmental Incentive.

Essex & Suffolk Water's current developer charges are here: Developer services charges. Household properties may be eligible for a 100% discount against the infrastructure charge if it meets our criteria, set out in accordance with OFWAT's Environmental Incentives Common Framework. This is designed to encourage new developments to achieve more water-efficiency standards and encourage sustainability. Developers must demonstrate that the properties have been fitted to achieve a consumption of no more than 100 litres per person per day[9] and that installed fittings do not exceed the maximum consumption set out in the below column under 'Common Environmental Incentive'. ESW may audit a sample of properties to verify that submitted information matches the fittings installed at the property. The applicant would need to send in the correspondence to demonstrate they had been successful in obtaining the Environmental Incentive.

met. The Authority will expect developers to make a case on a site-by-site basis. If 90l/h/d is proven as not viable or practicable, then a standard between 90l/h/d and 110l/h/d is expected.

Major non-household developments that require significant non-domestic water use need to liaise with the relevant water company about availability and produce a Water Resource Assessment which shall be shared with the relevant water company as any application is considered.

Policy PUBDM55 may be of relevance for some non-domestic schemes. That policy sets a BREEAM standard and emphasises the importance of meeting water calculator credits through that standard.

Also see open space policy (PUBDM10) – this states that artificial pitches that are designed to require water will not be permitted. Other new pitches that require watering will need to demonstrate how water will be supplied and used sustainably.

And in terms of landscaping, the landscape section states: to reflect that the East of England is an area of water stress, new landscaping/planting is expected to follow sustainable planting principles and be adaptive to climate change and be water-smart: using plants that are not dependent on additional watering/do not require a large amount of water.

This guide may be of use to applicants: Developing water efficient homes (pdf | watersafe.org.uk). So too could the Norfolk and Suffolk 'Reclaim the Rain' project: Reclaiming the Rain (reclaimtherain.org). More details on implementing the policy are included in Appendix 5.

Appendix 3: Viability Assessment of 90l/h/d

Viability impact of increased water efficiency measures – 90l/p/d

Report to the Broads Authority by Three Dragons – January 2026

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Introduction

To assist the Broads Authority (BA) in drafting its Regulation 19 Local Plan, Three Dragons produced a Local Plan Viability Assessment (LPVA) (and Technical Appendices) in October 2024 to demonstrate viability and hence deliverability of draft policies. Along with other policies, the assumptions in the LPVA accounted for the impacts of draft Policy PUBDM7: Water efficiency and re-use as shown in full below.

Policy PUBDM7: Water efficiency and re-use

1. All new/replacement/converted dwellings (including holiday/visitor accommodation and residential ancillary accommodation) will be designed to have a water demand equivalent to 110 litres per head per day or any higher standard subsequently established nationally or locally. Measures to reduce water demand further will be encouraged and supported.
2. All new/replacement/converted or extended buildings are required to incorporate greywater recycling and rainwater harvesting unless it is not feasible to do so.
3. Washing up provision and toilets and showers associated with camping, caravanning and glamping sites are required to be designed to be water efficient.
4. All new/replacement/converted non-domestic buildings are required to be designed to be water efficient
5. Planning applications need to include sufficient detail as to the intended standard and set out the measures to be incorporated to enable compliance.

The costs for achieving water demand equivalent to 110 litres per head per day, which is an optional technical standard in the Building Regulations Part G, are negligible to zero and can be dealt with through a water fittings approach as described for example in the Future Homes Hub report: Water Ready April 2024. The cost for greywater recycling and rainwater harvesting will vary considerably depending on the measures taken but can also be met with minimal cost. Hence these measures were accounted

for within build costs and plot costs for the viability modelling.

Since publication of the LPVA and in response to an evidence report on water stressed areas which was produced by a number of water authorities, including Anglian Water,

Shared Standards in Water Efficiency for Local Plans June 2025 the BA has asked for further viability information regarding the impact of moving to water demand equivalent to 90 litres per head per day.

Cost assumptions for water efficiency

Again this is a cost that can be met through a fittings-based approach. The Water Ready report (table 3) shows how this can be achieved with costs ranging from £1,000 to £3,000 per dwelling. **We have assumed that a mid-point of £2,000 is reasonable.** This is a similar approach as taken by Chelmsford Council in their recent Viability Update Note November 2024 paragraph 5.24, although we note this has not yet been through examination.

As a comparison, the adopted Crawley Borough Council Local Plan, sets out through Policy SDC4 that all new residential development within the 'Sussex North Water Resource Zone (WRZ)' "is designed to utilise no more than 85 litres of mains supplied water per person per day". The policy was supported at examination by a Topic Paper May 2023, which references the Sussex Water Neutrality Assessment (Part C Strategy December 2022) and provides costs to achieve a 85l/p/d standard: "*A fittings-based approach would cost between £349 and £431 per dwelling. Where appliances (i.e. dishwashers and washing machines) are not part of the standard fit-out this cost range would increase to £1,049 to £1,531 (representing the additional cost of supplying appliances specified to the required water-efficient standard)*".

Applying a CPI increase of 2.3% to the Crawley costs (covering the period between the 2 reports) would take the upper range to between £441 and £1,566 per dwelling, depending on whether appliances were provided as standard. Noting that anecdotal evidence suggests that appliances are usually supplied by the developer, these figures are below those taken from the Water Ready report, demonstrating our cautious approach.

Under the Water Environmental Incentive Scheme various incentives are offered by the water companies to developers (£500 per dwelling by Anglian Water Company for each eligible plot built by a developer that achieves 90 l/p/d for example – from April 2025). We have not allowed for an incentive in our sensitivity modelling because the amounts are variable and not necessarily guaranteed, however, in practice, some incentive is likely to be available to reduce the overall cost.

Impact on viability

The results of the original viability modelling can be found in the LPVA tables 5.1 for non-waterfront locations and 5.2 for waterfront locations. Sensitivity modelling where affordable rented units were changed to social rent can be found at table 5.4. All **typologies demonstrate strong viability with sufficient headroom to absorb the additional cost for water efficiency of 90 l/h/d**. The exceptions to this are the 1-unit typology which is not viable in any speculative circumstances and the 3-unit typology which is marginally non-viable on brownfield land in non-waterfront locations with social rented affordable dwellings (but viable with affordable rent).

As a further sensitivity test, we have taken 3 sample typologies and cash-flowed the additional cost. We have taken non-waterfront locations on brownfield land where, although results fully supported the BA draft policies, viability was lower than on waterfront or greenfield typologies. Discounting the 1-unit typology, we have included the least viable typology, 3-units, as well as the largest typology (100 units) and the 12- unit typology which is just above the 10-dwelling threshold. The results, on a per unit basis, with differing affordable rented tenures, are shown in the table below.

Table 1: results of water efficiency modelling to 90 l/h/d – residual value per unit for brownfield land in non-waterfront locations (rounded)

Ref	Units	Original result	With water efficiency measures
Res 2 - AR	3	£7,800	£5,700
Res 2 - SR	3	-£700	-£2,700
Res 5 - AR	12	£43,300	£41,200
Res 5 - SR	12	£35,400	£33,300
Res 7 - AR	100	£46,700	£44,700
Res 7 - SR	100	£38,500	£36,400

AR = affordable rent / SR = social rent

The results show reduced viability but, in all circumstances, viable typologies remain viable and deliverable. The 3-unit typology with social rented units produces marginally non-viable results but the viability of the same scheme with affordable rented units shows that a small adjustment to the housing mix could ensure viability. In fact, the additional cost per typology represents between 0.63% and 0.7% of scheme GDV.

Conclusion

The impact of the additional cost involved in moving to water demand equivalent to 90 litres per head per day has minimal impact on viability. The results of the sensitivity testing do not change any of the conclusions set out in chapter 7 of the LPVA.