



**Broads Local Plan
Examination**

**MATTER 7: Water flooding and navigation
(PUBDM3)**

Written Statement

Anglian Water Services Ltd

June 2018

a) Do Policies PUBDM1 and PUBDM2 provide effective guidance for the protection and enhancement of water quality and dealing with foul drainage? Are there any outstanding objections from Anglian Water Services and the Environment Agency?

Anglian Water has previously raised concerns relating to Policy PUBDM1 of the Publication Broads Local Plan in relation to how it would take account of a change of circumstance in the Horning sewerage catchment. Further to discussions with the Broads Authority regarding this policy we have withdrawn our previous objection.

We consider Policy PUBDM1 as currently drafted provides effective guidance for ensuring the protection and enhancement of water quality and given appropriate consideration to foul drainage.

b) Are the higher water efficiency standards in Policy PUBDM3 justified on the basis of local need? Has their impact on viability been assessed?

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.

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

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.

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 Broads 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 Broads Authority Local Plan, or individual development proposals, unviable.

c) Does Policy PUBDM5 provide an effective framework for dealing with surface water run-off?

The Broads Authority has proposed changes to the wording of the second paragraph of PUBDM5 following previous discussions with Anglian Water, Environment Agency and Norfolk County Council as Lead Local Flood Authority.

The proposed changes to Policy PUBDM5 would address our previous concerns relating to this policy. Subject to the inclusion of these changes we consider Policy PUBDM5 is an effective framework for dealing with surface water run-off.

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

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.