

Broads Authority Local Plan Regulation 19 version Representation Form

This is the form for making representations on the Broads-Authority Local Plan Publication version.

There is guidance about how to respond to this consultation and that can be found here: [Regulation 19 response guidance](#)

The various documents that are being consulted on can be found here: [Consultations](#)

The consultation ends 4pm on 26/09/2025. Responses received after this date may not be considered. Only representations received within this period have a statutory right to be considered by the Inspector at the subsequent examination.

Please note:

- **Separate forms should be completed for each representation.**
- All respondents must provide their personal details.
- Representations should be on the basis of the **soundness or legal compliance** of the Plan. (Please see guidance note for more details.)
- It is recommended that groups who share a common view submit a **single form rather than multiple copies** and provide a list of each person supporting the representation.
- By completing this form you agree to your details being shared. Your name, organisation and comments (but not your other personal details) will be made available for public viewing. **These representations cannot be treated as confidential.**

* 1. Your Contact Details:

Name: [Sarah Bowerman](#)

Organisation/Group: [Essex & Suffolk Water](#)

2. Agent Details (if applicable):

Name: [Mark Hodgson](#)

Organisation/Group: [Savills \(UK\) Ltd](#)

3. Group Representations:

If your representation is on behalf of a group, how many people support it? [N/A](#)

Please send a list of each person in your group that supports the representation to planningpolicy@broads-authority.gov.uk.

* 4. To which part of the Plan does your representation relate?

Paragraph Number:

Policy Number: [Policy PUBDM7: Water efficiency and re-use](#)

Map Reference:

Appendix:

Supporting Document:

*** 5. Do you consider that this part of the Plan meets the legal and procedural requirements?** (see guidance note for assistance with this question)

Yes

No

*** 6. Do you consider this part of the Plan has met the tests of soundness?** (see guidance note for assistance with this question)

Yes

No

*** 7. If you answered No, to Q6 - Do you consider this part of the Plan to be unsound because it is not:**

Positively Prepared:

Justified:

Effective: The policy is not considered to be effective in relation to the development of essential water infrastructure.

Consistent with National Policy:

(Select this option if you did not answer no)

*** 8. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.**

It is recognised that the Broads Local Plan is at an advanced stage in its preparation and includes the higher optional standards for water efficiency in areas of serious water stress (110 l/p/d). However, it is considered that Policy PUBDM7 is not effective as it does not impose tighter water efficiency standards than Building Regulations and therefore does not encourage sustainable growth.

Essex & Suffolk Water would like to work with The Broads Authority both within this plan's timeframe and in a future iteration of their Local Plan, to introduce tighter water efficiency standards that 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.

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.

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 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.

Tighter water efficiency standards that can be justified by evidence are 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 there are significant challenges in meeting predicted domestic and non-domestic growth in water demand whilst also meeting statutory environmental obligations (i.e. 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. These incentives can support the viability of delivering water efficiency measures.

*** 9. Have you raised this issue during previous consultations on the Local Plan?**

~~Yes~~

No

If you have answered 'No' could you please explain why this has not been raised before:

Savills (UK) Ltd was not acting on behalf of our client, Essex & Suffolk Water, during the previous consultations on the Local Plan. To provide comments during the Regulation 19 consultation, it is not required to have commented on previous versions of the Local Plan. Comments during the Regulation 19 consultation are focused on issues of legal compliance and soundness.

*** 10. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound.** You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation. If you are not seeking changes then please write 'not seeking changes'.

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 and 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 recommended that Policy PUBDM7 is 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.

It is proposed that the wording of Policy PUBDM7 be updated:

“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 recycling¹¹ 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.”

To:

“1. All new/replacement/converted dwellings (including holiday/visitor accommodation and residential ancillary accommodation) will be designed to have a water demand equivalent to 90 litres per head per day of mains supplied potable water, or any tighter water efficiency standard subsequently established nationally through Building Regulations Part G 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 include water efficient fittings.

4. All new/replacement/converted non-domestic buildings are required to be designed to be water efficient and should aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) under the BREAAAM standard, with a minimum score of 3 credits within WAT01 Water Consumption.

5. Planning applications need to include sufficient detail as to the intended standard and set out the measures to be incorporated to enable compliance.

*** 11. If your representation is seeking a change, do you consider it necessary to participate in the public examination?** (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

No

I am not seeking changes

*** 12. Would like to be notified of the following?**

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Yes

No

*** 13. Please sign and date this form (writing your name and dating it is adequate):**

Signature:

Date: [25/9/25](#)

The closing date for responses is 4pm, 26/09/2025