Evidence Submitted by United Utilities Water Limited to Justify the Implementation of the Optional Standard for Water Efficiency in Part G of Building Regulations

December 2025

Executive Summary

United Utilities Water Limited (UUW) strongly supports the implementation of the tighter water efficiency standard within development plan policy. Whilst the North West is not classified as seriously water stressed, UUW presents compelling evidence that justifies the implementation of this standard based on regional water resource pressures, national policy alignment, and viability considerations.

Within the North West there are 4 resource zones for the supply of water. Oldham Metropolitan Borough falls within the Strategic Resource Zone (SRZ) for water supply. The SRZ which serves 7 million people.

The Planning Practice Guidance (PPG) outlines a range of primary sources of evidence that can be used to justify the implementation of the tighter standard for water efficiency in the construction of new dwellings. The determining evidence is not limited to whether a region falls within an area classified as water stressed. The PPG is clear that there are other sources of primary evidence notably an up-to-date Water Resource Management Plan (WRMP) which can be used to justify the implementation of the tighter standard.

Clear evidence of need: The latest WRMP for UUW, published in 2024 and hereafter referred to as WRMP24, confirms that the SRZ faces a growing water supply-demand deficit that is 52.6 Ml/d in 2025/26 and without new interventions this is projected to reach 314 Ml/d by 2049/50. Therefore, there is primary evidence in the form of WRMP24, which demonstrates the urgency of the need to implement water demand reduction measures now.

Consultation and endorsement: The publication of WRMP24 was the subject of extensive consultation with relevant stakeholders including the Environment Agency. In addition, the Environment Agency has supported the implementation of the tighter standard for water efficiency in other local authorities covered by the SRZ. Similar policies have been adopted in other local authorities in the SRZ including Lancaster, Blackburn, Wirral, and Cheshire West and Chester.

Viability and supply: Recent evidence (Water Ready 2024) confirms that implementing the tighter standard for water efficiency incurs no additional cost and can be implemented using a fittings-based approach. A fittings-based approach is implementable in all dwelling types, i.e., apartments and houses without any consequential cost impact.

In light of the above, UUW recommends that the development plan includes a policy that requires the implementation of the tighter water efficiency standard, which aligns with Oldham's climate and sustainability commitments and its aspirations to travel towards net zero.

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1) United Utilities Water Limited (UUW)

UUW is the statutory water and wastewater undertaker for the north west of England, which includes Oldham. UUW is a statutory consultee in the preparation of development plans.

2) Recommended Policy

UUW strongly recommends that the following policy wording is included in the local plan to ensure that the tighter building regulations optional requirement for water efficiency is a requirement in the construction of new dwellings.

All new residential developments are expected to achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.

Non-residential development will be required to achieve five credits for category Wat 01 of BREEAM unless demonstrated impracticable.

The justification for our position is set out below.

3) National Legislation, Policy and Guidance

Water Industry Act 1991

Section 93A of the Water Industry Act 1991 places a duty on every water undertaker to promote the efficient use of water by its customers.

National Planning Policy Framework (NPPF)

The purpose of the planning system is to contribute to the achievement of sustainable development. It identifies three overarching objectives (economic, social and environmental). The efficient use of water is directly linked to these objectives.

Paragraph 162 states that *'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the* ***long-term implications*** *for flood risk, coastal change,* ***water supply****, biodiversity and landscapes, and* ***the risk of overheating from rising temperatures****. Policies should support appropriate measures to ensure the* ***future health and resilience of communities and infrastructure to climate change impacts****....'*

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National Planning Practice Guidance (PPG)

For ease of reference and clarity of the policy thresholds for implementing the tighter standard for water efficiency, UUW has extracted the below paragraphs from the PPG Housing: optional technical standards.

> ***'Can local planning authorities require a tighter water efficiency standard in new dwellings?***
>
> *In setting out how the planning system should contribute to the achievement of sustainable development, the National Planning Policy Framework and guidance makes clear this includes planning to provide the high quality housing required to meet the needs of present and future generations, and helping to use natural resources prudently. The Framework's policies expect local planning authorities to adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. Early engagement between local planning authorities and water companies can help ensure the necessary water infrastructure is put in place to support new development. See water supply guidance. The local planning authority may also consider whether a tighter water efficiency requirement for new homes is justified to help manage demand.*
>
> *Paragraph: 013 Reference ID: 56-013-20150327*
>
> *Revision date: 27 03 2015*
>
> ***What standard should be applied to new homes?***
>
> *All new homes already 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.*
>
> *Paragraph: 014 Reference ID: 56-014-20150327*
>
> *Revision date: 27 03 2015*
>
> ***How should local planning authorities establish a clear need?***
>
> *It will be for a local planning authority to establish a clear need based on:*
>
> - *existing sources of evidence.*
> - *consultations with the local water and sewerage company, the Environment Agency and catchment partnerships. See paragraph 003 of the water supply guidance*
> - *consideration of the impact on viability and housing supply of such a requirement.*
>
> *Paragraph: 015 Reference ID: 56-015-20150327*
>
> *Revision date: 27 03 2015*
>
> ***What are the existing sources of evidence?***
>
> *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*

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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.

Paragraph: 016 Reference ID: 56-016-20150327

Revision date: 27 03 2015'

In summary, the PPG states that where there is a clear local need, local planning authorities can set the tighter Building Regulations optional requirement of 110 l/p/d. Implementation should be based on existing sources of evidence; consultation; and consideration of the impact on viability and supply**.**

The PPG is clear that there are a range of pieces of primary evidence that can be used to justify the optional water efficiency standard including:

- the water stressed classification;
- Water resource management plans; and
- River Basin Management Plans. 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.

As such, the water stressed classification is not the only source of primary evidence which can be used to justify the implementation of the tighter water efficiency standard.

4) Oldham Metropolitan Borough

In the North West, the supply of water is split into 4 resource zones. Oldham is served by UUW for public water supply and falls within the '*Strategic Resource Zone*'. The Strategic Resource Zone (SRZ) covers the majority of the North West (see plan in Appendix 1). It serves around 7 million people. Water to the SRZ is supplied from a large system of river sources and reservoirs linked by aqueducts, plus several groundwater sources. The evidence to support the tighter standard for water efficiency in Oldham is not constrained to simply considering the local needs of Oldham but rather the water needs of the SRZ in its entirety.

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5) Evidence

a) The National Framework for Water Resources 2025[1]

The modelling of scenarios of population growth, climate change and environmental sustainability reductions demonstrate that without action, there could be a public water supply deficit of up to 5,000 Ml/d by 2055. It identifies various contributing factors namely:

- Environmental sustainability: '*Reductions in abstraction licences are needed in some catchments to accommodate legal environmental requirements'*;
- An increased population: An increase of 8 million people by 2055;
- Improved resilience to drought: '*By 2040, or earlier, water companies are planning to be resilient to a drought which has a 0.2% chance of occurring in any year'*.
- Climate change: '*The impacts of climate change are already starting to be felt and is likely to have an increasingly bigger impact. There is an urgent need to deliver actions to adapt to the impacts of climate change to protect the environment, improve the resilience of water supplies and to safeguard the economy from future periods of prolonged dry weather and drought.'*

Appendix B[2] confirms a policy demand target of 110 l/p/d for all households in England by 2050.

b) Environment Improvement Plan 2025[3]

This outlines that current trajectories project a shortfall of 5 billion litres of water per day in the UK by 2050. In response it outlines commitments to reduce the use of public water supply per head of population from a 2019 to 2020 baseline by 9% by 31 March 2027 and by 14% by 31 March 2032. It also commits to reduce all household water use to 122 l/p/d by 2038 from a 2019 to 2020 baseline. This compares with average water use in England in 2024/2025 of 136.5 l/p/d[4]. It also proposes to reduce non-household water use by 9% by 2038.

c) Water Stressed Areas – final Classification (July 2013)[5]

This sets out the revised methodology developed by the Environment Agency for the classification of areas of water stress. The primary aim of the revision was to provide evidence on water stress to the Secretary of State for designation of areas in England which could be universally metered under the

[1] The National Framework For Water Resources 2025

[2] Appendix B: results of public water supply water resources modelling: National Framework for Water Resources 2025

[3] Environment Improvement Plan 2025

[4] Water Resources 2024 to 2025: analysis of the water industry's annual water resources performance November 2025

[5] Water Stressed Areas – final Classification (July 2013)

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Water Industry (Prescribed Conditions) Regulation 1999 (as amended). Under the Regulations, water companies in areas classified as seriously water stressed need to evaluate compulsory metering alongside other options when preparing WRMPs.

This document identified the UUW area as one experiencing moderate water stress. As such, UUW was not seriously stressed for the purposes of compulsory metering. The document states that '*Even in those areas designated as "not in serious water stress" under the new methodology, there should be some activity to ensure that water is used more efficiently and effectively. Water companies and water users should not disregard the environmental consequences of their abstraction.'*

d) North West River Basin Management Plan (RBMP) (2022 Update)[6]

The RBMP identifies a high percentage of water bodies in the North West as not achieving good ecological status. Section 4.2.5 of the Habitats Regulation Assessment[7] identifies water demand management as a measure proposed to manage the flow and level of water.

e) Water Stressed Areas – 2021 Classification (July 2021)[8]

This confirms which water companies are identified as seriously water stressed. As per the 2013 classification, the principal purpose of the document is to inform the consideration of compulsory metering. It states that '*Local authorities can use the water stress determination to inform whether they can require the tighter standard of 110 litres per head per day in new developments. Otherwise the use of the water stress determination is only to allow water companies to consider compulsory metering in their water resources management plans. It must not be used for other purposes such as development planning or water resources planning.'* It acknowledges that '*Even those areas that have been determined as not seriously water stressed, still experience pressure on water resources.'*

It only classifies local authorities as being either seriously stressed or not seriously stressed. The area of UUW is identified as 'not seriously stressed' for the purposes of compulsory metering. It states, '*We have continued to use the terms 'serious' and 'not serious' as in the classification in 2013 as the determination is solely to indicate the consideration of compulsory metering.*'

f) The Water Resources West (WRW): Water Efficiency in New Homes v2.0[9]

This recognises that the WRW region faces the **second highest pressures on water resources in England**, largely due to population growth. At the same time, the abstraction licences of water companies are being reduced. Page 5 states:

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[6] North West River Basin Management Plan 2022

[7] River basin management plan for the North West River Basin District HRA

[8] Water Stressed Areas – 2021 Classification

[9] Water Efficiency in New Homes, Water Resources West

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'A consequence of the population and housing growth in our region has meant that water companies have been asked to accommodate the new growth, yet at the same time their abstraction licenses are being reduced. Therefore it is vital that water companies support and are supported in initiatives to help get 110 l/p/d in planning policies across local authorities in the region, to help meet their requirement to supply their customers. The water companies in Water Resources West are Dwr Cymru Welsh Water, Severn Trent, South Staffs and United Utilities. In preparing your local plan you should consult with your local water supply company on specific local issues which may influence your decision on whether the 110 l/p/d should be applied, even if the area is not classed as being under 'significant water stress'.' (Underline is UUW emphasis).

g) Places for Everyone

Paragraph 5.39 of Places for Everyone specifically considers water efficiency. It states:

'5.39 Climate change and population and economic growth can put increasing pressure on the available potable water supply for homes and businesses. It is important that water is conserved and efficiently used as much as possible to help build resilience to periods of drought; avoid over abstraction; reduce carbon emissions from water treatment and disposal; and protect river and wetland habitats from degradation. All new homes have to meet mandatory national standard set out in Building Regulations (of 125 litres/person/day). Where there is a clear local need, the government's Housing Optional Technical Standards paragraph 013 and 014 set out that local authorities may also consider tighter water efficiency requirements for new homes (110 litres a day) to help manage water demand. This will be determined through the preparation of district local plans.'

This paragraph reflects the submission of evidence by UUW to the Examination in Public for Places for Everyone, to request the implementation of the tighter optional standard for water efficiency. Subsequent to the Examination of Places for Everyone, it is material to note that:

- UUW has published an updated Water Resource Management Plan 2024 (WRMP2024); and
- updated evidence on the cost of implementing the tighter optional standard for water efficiency is published. See Table 3 of Water Ready A report to inform HM Government's roadmap for water efficient new homes.

Both of these documents are addressed below.

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h) United Utilities Final Water Resource Management Plan 2024[10]

The National Planning Practice Guidance is clear that there are a range of pieces of evidence that can be submitted to justify the implementation of the optional standard for water efficiency. It specifically references water resource management plans (WRMPs) as a primary source of evidence to support the implementation of the optional standard for water efficiency in the construction of new homes (see paragraph: 016 Reference ID: 56-016-20150327). UUW has recently published an updated WRMP 2024. Page 74 states:

'Based on our commitments to reduce demand for water, to support water resources resilience and reduce our impact on the environment, we are requesting that all local authorities in our supply area adopt the optional minimum building standard of 110 litres per person per day (lppd) in all new builds. We already incentivise water efficiency in new builds, by offering a 90% reduction in water charges to developers building water efficient homes which include measures to reduce water use to 100 lppd. This scheme was launched in 2018 and initially targeted a standard of 110 lppd, but due to the success of the scheme and to encourage further improvements in water efficiency, we reduced the threshold to 100 lppd in 2021. To date, more than 86,000 plots have been registered with many of these already built, creating savings of £25m for developers. A similar reduction on wastewater charges is available for properties featuring sustainable drainage, and both schemes are still available to developers building homes in the North West.'

WRMPs must be prepared to comply with the latest regulatory guidance. Reflecting the challenges presented by climate change, a key change to the regulatory guidance since our previous WRMP is the requirement to demonstrate resilience to 1 in 500 year droughts by 2039. Previously the requirement was to be resilient to a 1 in 200 year drought. The Environment Agency's Water Resources Planning Guidelines state that WRMPs should consider the supply-demand balance at times when a company's supplies are low, and demand is high. The baseline scenario to be adopted for companies in England should be the Dry Year Annual Average scenario.

WRMPs are also expected to take account of government aspirations for leakage reductions and reductions in per capita consumption (PCC) in their final plans. These are set out in the Environment Improvement Plan 2025 and the National Framework for Water Resources 2025 in which the government targets a reduction in water consumption to 110 l/p/d by 2050.

[10] United Utilities Final Water Resource Management Plan 2024

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WRMPs must also align with the relevant regional plan. For UUW, the Water Resources West Regional Plan and associated evidence recommends the implementation of the optional standard for water efficiency (see above).

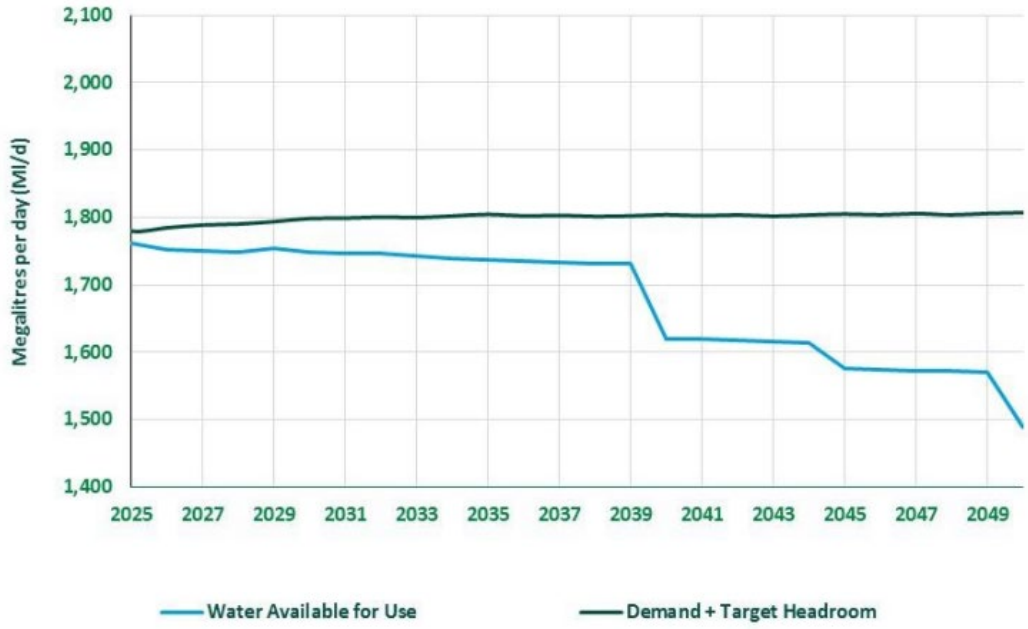
UUW has now published a Final Water Resource Management Plan 2024 (WRMP24) for the period 2025-2050. This sets out the baseline supply-demand balance for water resources, i.e., the difference between the water demanded and the water that can be supplied within the SRZ. It shows that without the drought supply and demand measures included in our drought plan, there is a potential deficit in the SRZ, of 52.6 Ml/d in 2025/26 and without new interventions this rises to 314 Ml/d by 2049/50. This deficit is illustrated in the below table and figures, which are extracted from WRMP24.

Table 14 Summary of baseline dry year annual average supply-demand balance by resource zone[11]

Dry Year Annual Average Supply-Demand Balance (Ml/d) for year:

Resource Zone	2025/26	2030/31	2035/36	2040/41	2045/46	2049/50
Strategic	-52.6	-48.5	-63.9	-180.1	-226.3	-314

Figure 22 Strategic Resource Zone – Dry Year Annual Average Supply-Demand Balance[2]



[11] Water Resource Management Plan 2024 Main Report 2023 (page 57)

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The baseline supply-demand balance shown in Table 14 and Figure 22 of WRMP24 confirms that without any interventions, the SRZ faces a deficit such that available supplies are insufficient to meet demand plus target headroom from 2025 onwards. It is a deficit that covers the future development plan period for Oldham and increases over time.

It is relevant to note that these figures were calculated in advance of the latest housing figures for the North West which further increase the North West's annual housing requirement. It is also material to note that the per capita consumption assumed for new properties for the WRMP24 planning period is roughly 110 l/p/d.

The supply-demand balance deficit is not a longer-term problem. It is an immediate problem, which needs to be addressed through a range of interventions now. Without interventions, which include a reduction in leakage and the construction of new dwellings to the tighter standard for water efficiency, the supply-demand balance deficit will worsen and the pressures on the environment will increase.

Based on our commitments to reduce demand for water, to support water resources resilience and reduce our impact on the environment, WRMP24 requests that all local authorities in our supply area adopt the optional minimum building standard of 110 litres of water used per person per day in all new build dwellings. This is similarly stated in the Water Resources West Final Regional Plan and associated evidence (see above).

Importantly, these interventions will increase resilience to climate change, reduce pressure to find new sources of water supply and reduce pressure on the environment. Changes to the flow and level of our water bodies are a water management issue and a key issue to consider in how we respond to the supply and demand deficit. In this context, it is relevant to note that the North West River Basin Management Plan (see above) identifies a high percentage of water bodies as not achieving good ecological status or potential.

i) Water Ready A report to inform HM Government's road map for water efficient new homes (April 2024)[12]

The optional standard is currently set at 110 litres l/p/d. Table 3 of this document confirms that the optional standard for water efficiency can be implemented at no extra cost using a fittings-based approach. It is therefore an approach which is implementable in all dwelling types, i.e., apartments and houses without any consequential cost impact. As such, there should be no concerns about the impact on viability and supply as a result of implementing the optional standard for water efficiency.

[12] Water Ready A Report to Inform HM Goverment's Roadmap for Water Efficiency New Homes

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UUW wishes to highlight that this is up-to-date evidence on the cost of implementing the tighter water efficiency standard. Importantly Water Ready was published in April 2024 with contributions from a wide range of developer, industry and supplier representatives.

6) Consultation

Paragraph 015 of the NPPG states that a clear need should be established through consultation with the local water and sewage company, the EA and catchment partnerships. It is material that many of the aforementioned documents, including WRMP24, have been subject to consultation with significant involvement from the EA. It is also material to note that the EA has confirmed its support for the implementation of a tighter water efficiency standard in other local authorities in the SRZ. For example, in the Examination of Places for Everyone and the Examination of the Lancaster Local Plan. See emails from the Environment Agency dated 6 October 2022 and dated 5 September 2022 (Appendix 2).

7) Viability

The above evidence has confirmed that a target per capita consumption of 110 l/p/d can be achieved at no additional cost as such there is no impact on viability or supply.

It is worth noting the wider economic, social and environmental benefits. Research undertaken for the Welsh Government indicated potential annual savings on water and energy bills for householders of £24 per year as a result of such water efficiency measures[13]. The Consumer Council for Water notes that the discretionary, tighter (building) standard of 110 l/p/d is something that should be pursued, acknowledging that saving water is not the only driver of water efficiency[14]. Water efficiency has a positive effect on reducing energy bills, water bills of metered customers and carbon emissions thereby reducing environmental impact.

8) Conclusions

When considering whether an area meets the national policy and guidance for applying the tighter standard for water efficiency the key criteria in the PPG relate to:

- evidence of need;
- consultation with other bodies; and
- whether consideration has been given to the impact on viability and housing supply.

[13] Advice on water efficient new homes for England, Waterwise, September 2018

[14] Consultation on measures to reduce personal water use, A Defra consultation paper, Consumer Council for Water Response (October 2019)

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The policy threshold is not constrained to the water stress classification.

Based on the policy review, the summarised evidence, the consultation undertaken and the cost of delivering the optional water efficiency standard, implementation of the optional standard is justified and consistent with national policy in the PPG.

Although the SRZ is not within an EA water stressed area for the purposes of compulsory metering, there are other primary sources of evidence which justify implementation not least an up-to-date WRMP, which has been the subject of detailed consultation, including with the EA.

Evidence to support the introduction of the optional standard is included within other pieces of evidence including the WRW evidence and the North West River Basin Management.

There is clear up-to-date evidence that there is no cost to implementing the optional water efficiency standard and therefore no impact on viability or supply.

It is important that the tighter water efficiency standard is adopted to ensure future water availability and supply in line with WRMP24, the WRW evidence, the need to improve water bodies, and reflecting the ambitions set out in the Environment Improvement Plan 2025 and the policy target confirmed in the National Framework for Water Resources 2025. In the face of a supply and demand baseline deficit in the SRZ and a regional and national policy target to reduce consumption to 110 l/p/d in all houses (existing and new build), it would be illogical to construct new houses now which do not contribute to this target. The introduction of the policy will have economic, social and environmental benefits consistent with the purpose of the planning system to achieve sustainable development. Implementing the policy is consistent with the need to respond to the climate emergency and wholly consistent with Oldham Council's Climate Emergency declaration in September 2019. Importantly, application of this approach has added economic and societal benefit by reducing customer bills. There is compelling evidence which meets all the tests of the PPG to justify the implementation of the tighter optional water efficiency standard in the SRZ. This compelling evidence is reflected in the adoption of water efficiency policies in other locations in the SRZ including Lancaster, Blackburn, the Wirral and Cheshire West and Chester. On this basis UUW recommends that the policy wording is included so that the water efficiency requirements for new development are clear and unambiguous.

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Geographical locations of our water resource zones

Barepot Resource Zone

Water supply is from a river source, providing non-potable water (that is, water that is not of drinking quality) for industry.

Average supply: about 22 million litres per day

Carlisle Resource Zone

Water supply is from river sources and one reservoir.

Population: about 110,000
Area: 925 km²
Average supply: about 30 million litres per day

Strategic Resource Zone

Water supply is from a large system of river sources and reservoirs linked by aqueducts, plus several groundwater sources.

Population: about 7,170,000
Area: 11,962 km²
Average supply: about 1,794 million litres per day

North Eden Resource Zone

Water supply is mainly from groundwater sources, with a small amount imported from Northumbrian Water.

Population: about 14,000
Area: 925 km²
Average supply: about 7 million litres per day



Former boundary to the West Cumbria Resource Zone

Appendix 2

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From: Locke, Liz
To: Clark, Fiona Jayne
Cc: Leyssens, Andrew
Subject: RE: Lancaster Local Plan Policy - Policy DM30b Water Efficiency
Date: 05 September 2022 16:17:49
Attachments: image001.png

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Dear Fiona,
Please see our supporting statement below:

Further to our statement that we are satisfied that the Climate Emergency Review of the Local Plan Part One and Part Two are both legally compliant and sound, the following comment sets out our specific support for the inclusion of Policy DM30b.

The Policy requires new dwellings to meet the tighter Building Regulations optional 110 litres/person/day standard. We consider this is fully in compliance with para 153 of the National Planning Policy Framework (NPPF) which requires plans to take a proactive approach to take into account the long-term implications of climate change. National Planning Practice Guidance (PPG) then sets out how local authorities should establish a need for this tighter standard, taking into account existing sources of evidence, and in consultation with the local water company and the Environment Agency.

We recognise that the area covered by Lancaster City Council is not within an Environment Agency-identified 'water stressed area', however this is not the only source of evidence that can be used to support the requirement for the tighter water efficiency standard. We agree with the additional evidence clearly set out by Lancaster City Council in their response to questions relating to Policy DM30b. The introduction of the optional standard into local plan policies is supported both in the North West River Basin Management Plan; and in the National Framework for Water Resources. The local authority area falls within the Water Resources West regional group, which has been identified as having the second highest pressure on water resources in the country, due to population growth, future demand for housing, climate change and environmental protection measures.

The Environment Agency considers that the tighter water efficiency standard will help ensure future sustainable water availability across the region, and should therefore be adopted.

Regards,
Liz

Liz Locke
Planning Advisor Sustainable Places, Cumbria and Lancashire.
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https://carbonliteracy.com/the-carbon-cost-of-an-email/

From: Leyssens, Andrew <Andrew.Leyssens@uuplc.co.uk>
Sent: 01 September 2022 13:15
To: Ed.Senior <Ed.Senior@arup.com>; Locke, Liz <liz.locke@environment-agency.gov.uk>; Birkhead, John <John.Birkhead@uuplc.co.uk>
Cc: Ruth Jopling <Ruth.Jopling@arup.com>
Subject: RE: Lancaster Local Plan Policy - Policy DM30b Water Efficiency

> You don't often get email from andrew.leyssens@uuplc.co.uk. Learn why this is important

Dear Liz

Have you had chance to consider the below? This is now an urgent matter as we have to submit our statement to the LPA to confirm the evidence to justify the optional water efficiency standard. We have to submit this to the LPA tomorrow. Whilst I note that the attached letter from you confirms you have no objection, it would be helpful if you could confirm that you actively support the introduction of the optional water efficiency standard for new housing in the Lancaster Local Plan.

Is this something which you can consider to support us and the council? There have been objections to the policy from the HBF and Taylor Wimpey.

Please do let me know if you wish to discuss.

Thanks – Andrew

Andrew Leyssens
Planning Manager
Planning, Landscape and Ecology
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From: Ed Senior [mailto:Ed.Senior@arup.com]
Sent: 25 August 2022 11:32
To: liz.locke@environment-agency.gov.uk
Cc: Ruth Jopling <Ruth.Jopling@arup.com>; Leyssens, Andrew <Andrew.Leyssens@uuplc.co.uk>

Subject: RE: Lancaster Local Plan Policy - Policy DM30b Water Efficiency

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Hello Liz

I received your out of office but understand you are back at work this week.

We are working up a response to the above – as per my email below, and wondered if this is something you can provide support for?

I have availability tomorrow if useful to discuss.

Look forward to hearing from you

Kind regards,
Ed

Ed Senior
Senior Planner

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From: Ed Senior
Sent: 16 August 2022 15:39
To: liz.locke@environment-agency.gov.uk
Cc: Ruth Jopling <Ruth.Jopling@arup.com>
Subject: Lancaster Local Plan Policy - Policy DM30b Water Efficiency

Hello Liz

I have been passed your contact details by Andrew Leyssens from United Utilities.

Andrew has been asked to support Lancaster Council in responding to objections from the HBF and housebuilders regarding the optional Water Efficiency requirement in Policy DM30b, as part of the Climate Change review of the Local Plan.

We are supporting United Utilities in preparing a response to the examination. I have noted the Environment Agency's response submitted to the Reg19 consultation earlier this year (Your Ref: NO/2012/104361/CS-02/EW1-L01) confirming the EA is satisfied that both DPDs are legally compliant and sound.

If possible, it would be beneficial to include support from the Environment Agency as part of our response to the Inspector's questions specifically on Policy DM30b.

Would we be able to include support from the EA as part of the response?

Kind regards,
Ed

Ed Senior
Senior Planner

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From:	Telfer, Helen
To:	Leyssens, Andrew
Subject:	RE: Places for Everyone
Date:	05 October 2022 16:03:45
Attachments:	image001.png image002.gif image003.gif image004.gif image005.gif image006.gif image007.gif image008.png image009.png

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Hi Andrew

Yes I can confirm this approach is supported.

Thanks

Helen

From: Leyssens, Andrew <Andrew.Leyssens@uuplc.co.uk>
Sent: 05 October 2022 15:03
To: Telfer, Helen <helen.telfer@environment-agency.gov.uk>
Subject: RE: Places for Everyone

Hi Helen

Thanks for the email. Can I just confirm that the EA do specifically support the implementation of the optional standard in Building Regs for water efficiency?

Thanks – Andrew

Andrew Leyssens
Planning Manager
Planning, Landscape and Ecology
M: 07827 807655
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From: Telfer, Helen [mailto:helen.telfer@environment-agency.gov.uk]

Sent: 05 October 2022 12:26
To: Leyssens, Andrew <Andrew.Leyssens@uuplc.co.uk>
Subject: RE: Places for Everyone

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Hi Andrew

Thank you for your email.

In response to the matters raised I would firstly like to clarify the Environment Agency's current position with regards to the Places for Everyone (PfE) Joint Development Plan Document. As it stands, we consider the plan to be legally sound and compliant under the National Planning Policy Framework for issues within our remit.

Referring to Policy JP-S 5 and requirement 8, we acknowledge that the intention of the policy approach is to set a strategic framework on which district Local Plans can set out more specific detail. As such, and without reference to specific standards, this requirement would seem to be reliant on Greater Manchester seeking to implement the national standards for water efficiency until subsequent Local Plans are able to adopt a stricter approach.

The National Planning Practice Guidance on optional technical standards for housing is clear that the planning system should contribute to the achievement of sustainable development which includes using resources wisely. Subsequently it outlines that all new homes will have to meet the national standards for water efficiency unless there is a clear local need for the tighter optional requirements of 110 litres/person/day. Paragraph 15 then sets out how local authorities should establish a need for this tighter standard, taking into account existing sources of evidence, and in consultation with the local water company and the Environment Agency as well as considering the impact on viability.

In reference to the existing sources of evidence listed by the NPPG to justify tighter optional requirements, we recognise that the districts within Greater Manchester are not within an Environment Agency 'water stressed area' based on the most recent 2021 classifications. However this is not the only source of evidence to support tighter standards and as noted in your response, there is specific reference in the North West River Basin Management Plan (2019) and in the National Framework for Water Resources (2020). The National Framework also identifies that the area of Greater Manchester falls within the Water Resources West regional group, which has been identified as having the second highest pressure on water resources in the country, due to population growth, future demand for housing, climate change and environmental protection measures.

In conclusion, the Environment Agency considers that tighter water efficiency standards will help ensure future sustainable water availability across the region and to meet the objectives within the National Framework for Water Resources. Whether or not there is sufficient justification to set this within the current PfE submission document and/or achieved through specific policies within subsequent Local Plans will be a matter for the GMCA/Planning Inspectorate to consider

during the forthcoming plan examination process.

Happy to discuss further if needed.

Kind regards

Helen

Helen Telfer
Strategic Planning Specialist, Sustainable Places Team
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington, WA4 1HT

helen.telfer@environment-agency.gov.uk
Mobile: 07342 064523
Telephone : 020 302 50618 / Internal 30618

Pronouns: she/her *(why is this here?)*





From: Leyssens, Andrew <Andrew.Leyssens@uuplc.co.uk>
Sent: 04 October 2022 20:43
To: Telfer, Helen <helen.telfer@environment-agency.gov.uk>
Subject: RE: Places for Everyone

You don't often get email from andrew.leyssens@uuplc.co.uk. Learn why this is important

Hi Helen

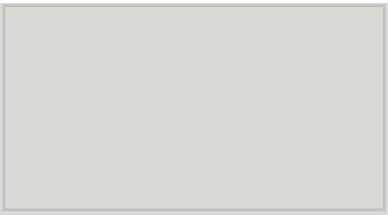
I just wondered if there was any update on this?

I'm mindful that I need to submit by midday on Thursday.

I'll be busy tomorrow morning but should be available in the afternoon if you wish to discuss.

Thanks – Andrew

Andrew Leyssens
Planning Manager
Planning, Landscape and Ecology
M: 07827 807655



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From: Leyssens, Andrew
Sent: 03 October 2022 18:05
To: 'Telfer, Helen' <Helen.telfer@environment-agency.gov.uk>
Subject: RE: Places for Everyone

Hi Helen

Thanks for your time earlier.

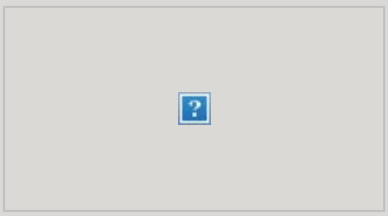
The draft statement is attached. I've also attached the example email from your colleague Liz Locke following the completion of a similar exercise for Lancaster earlier this year.

Please note the highlighted sections in the statement. When drafting this, I was hoping that you would be able to support our position but clearly this email is with a view to clarifying the EA's position in GM. I do hope the statement is sufficient to gain your support. It feels like the evidence has moved on since the matter was first considered in the early stages of the GMSF.

Do let me know if you wish to discuss further. The deadline for submission is midday on Thursday so I'm keen to finalise the statement asap.

Thanks again.

Andrew



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From: Leyssens, Andrew
Sent: 30 September 2022 15:47
To: Telfer, Helen <Helen.telfer@environment-agency.gov.uk>
Subject: Places for Everyone

Hi Helen

Hope you are well.

I am just preparing a written statement to Places for Everyone reading for next week.

We will be submitting a statement relating to the need for water efficiency to be more explicitly defined by inclusion of the optional housing water efficiency standard.

I wondered if this is something which the EA would be able to confirm as a actively supporting in Greater Manchester. This may be something on which you have already commented.

Thanks – Andrew

Andrew Leyssens
Planning Manager
Planning, Landscape and Ecology
M: 07827 807655
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