

**LOCAL PLAN REVIEW DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS -  
JANUARY TO MARCH 2022**

**SUMMARY OF RESPONSES TO Q25**

**Question 25 - Do you agree with the proposed policy for water efficiency standards? If not, why not?**

A summary of the comments received are set out below:

Comment	NWL Officer Response
<p>This policy is not necessary as a requirement is set out in the Building Regulations. The need to address climate change is being addressed on a co-ordinated and industry wide basis through Building Regulations changes, agreed targets and joint multi-agency working relationships.</p> <p>There is insufficient evidence provided for a locally needed lower requirement. It is considered that compliance with Building Regulations will be sufficient to demonstrate that energy/water efficiency, overheating and carbon reductions have been achieved.</p>	<p>Refer to paragraphs 7.57 – 7.60 of the main report.</p>
<p>Optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the PPG. This evidence does not appear to be present.</p>	<p>Refer to paragraphs 7.57 – 7.60 of the main report.</p> <p>Policies in the Local Plan will be subject to viability testing through the Local Plan Viability Assessment.</p>
<p>The Council needs to provide sufficient justification by applying the criteria set out in the PPG.</p>	<p>Refer to paragraphs 7.57 – 7.60 of the main report.</p>
<p>In setting planning policy on sustainable design, given the rapidly changing technologies and approaches, it is important to avoid policy wording that is too inflexible or could conflict with Government legislation and building regulations.</p>	<p>These comments are noted.</p>
<p>The proposed policy for water efficiency standards is agreed but there is scope to consider water efficiency in change of use and conversions and ambition for water efficiency standards to extend beyond new stock to existing stock (beyond the planning function).</p>	<p>These comments are noted.</p> <p>The compliance with water efficiency standards is dealt with through Building Regulations. Part G2 of the Building Regulations sets out that water efficiency requirements exclude dwellings formed by a material change of use.</p> <p>We cannot address issues in the existing stock unless planning permission is required.</p>

<p>From a public health perspective, the policy should ensure it enables opportunity to help lower energy bills and fuel poverty is associated with negative effects on mental wellbeing and stress. Section 9.67 NWL classification of a 'seriously water stressed' area has obvious concerns around health and wellbeing in long, dry, hot periods, especially for our more vulnerable populations.</p>	<p>These comments are noted. The Local Plan can only address those matters which are within the scope of the planning system.</p>
<p>It is incumbent on the LPA to show a clear need based on existing sources of evidence, consultation with local water and sewerage company, the EA and catchment partnerships, consideration of the impact on viability / housing supply. If sufficient evidence is provided, a change from 125l to 110l of water consumption per person per day may be justified.</p>	<p>Refer to paragraphs 7.57 – 7.60 of the main report.</p>
<p>Proposed policy for water efficiency standards is not supported. The standards proposed are 110 litres per person per day, which is more than the nationally required standards, which are 125 litres per person per day. The draft plan does not undertake consultations with the stakeholders stated within PPG in Paragraph 015.</p>	<p>Refer to paragraphs 7.57 – 7.60 of the main report.</p>
<p>Proposed policy is not supported. The proposed water efficiency standards should be justified by applying the criteria set out in the NPPG. Although, NWL is located within an area covered by Severn Trent, which has been classed as seriously water stressed, the Council's evidence does not demonstrate a clear local need.</p>	<p>Refer to paragraphs 7.57 – 7.60 of the main report.</p>
<p>Policy is supported, some house builders already design their homes to achieve a maximum of 110 litres of water per person per day.</p>	<p>These comments are noted.</p>
<p>Securing all water credits requires the adoption of potentially restrictive approaches such as grey water recycling, which may affect the feasibility of development. Amend the policy wording to achieving BREEAM excellent water credits which does require the extensive use of water efficiency measures and rainwater harvesting.</p>	<p>The BREEAM Wat01 water consumption requirements are very technical. Therefore, it is suggested that BREEAM excellent water credits is required instead. The policy wording will be updated to reflect this change.</p>
<p>All new developments should comply. There are other measures that could be considered to save water such as to only install showers and removing outside taps. Also, encouraging the use of rainwater collection which could then be used in</p>	<p>These comments are noted.</p>

<p>washing machines or to flush toilets. It would also be possible to reuse “grey water” such as bath water in this way.</p>	
<p>Support the proposals to change the policy and recommend the 110 l/p/d water efficiency standard this supports the delivery of a more resilient water system and mitigate some of the anticipated changes as a result of climate change. It also supports the objectives of the Humber River Basin Management plan that recommends the implementation of this water efficiency standard.</p>	<p>These comments are noted.</p>
<p>The proposed policy to adopt the Building Regulations lower water use requirement carries various benefits. An additional benefit is that it would lower the impact of new development on the River Mease SAC: This is a result of A) Less water being abstracted, and B) less foul water discharging to the river via waste-water treatment works, which subsequently results in a reduced amount of phosphorous entering the River. Welcome the intention to stick to the recognised lower water use requirements as used within the Building Regulations and the RBMP, as well as to further investigate the viability of setting this requirement to ensure its sustainability.</p>	<p>These comments are noted.</p>
<p>The benefits of water efficiency are wider than the household-level ones referred to in the consultation document. The requirement to achieve the national water efficiency standard of a maximum of 110 litres of water per person per day is welcomed. A driver that isn’t explicitly stated is that water efficiency measures are required to reduce the associated impact of a growing population accessing an already stressed resource.</p>	<p>These comments are noted.</p>
<p>In setting planning policy on sustainable design, given the rapidly changing technologies and approaches, it is important to avoid policy wording that is too inflexible or could conflict with Government legislation and building regulations.</p>	<p>These comments are noted.</p>
<p>Aiming to achieve best practice in an area of water stress is supported.</p>	<p>These comments are noted.</p>
<p>Any policy should be tested in terms of viability and deliverability. Any requirements should also be suitably evidenced and justified.</p>	<p>These comments are noted.</p>

<p>Your plans seem to ignore the damage all the new housing is doing to the water table and to the sewerage systems.</p>	<p>These comments are noted.</p>
<p>This area suffers from flooding and the proposals will only increase run off.</p>	<p>These comments are noted. This policy is concerned with water usage other policies will address flooding.</p>
<p>Policy is not supported. Whether or not NWL is 'water stressed' or not, the water companies are profligate with waste and over generous to their shareholders. Before the Local Plan considers sanctioning the water company's clients it should first hold the suppliers to account and force them to generate some real efficiencies and improvements.</p>	<p>These comments are noted but the points raised are not planning matters.</p>
<p>Proposed policy is supported. As Castle Donington is lower than the proposed development the risk of flooding NEEDS to be a major concern/issue.</p>	<p>These comments are noted. This policy is concerned with water usage. Other policies will address flooding.</p>
<p>Water use is a private, paid for, matter. Water in this country is not a scarce resource. If NWLDC wish to do something then get the water companies to improve their efficiency, get them to move more water from north to south.</p>	<p>These comments are noted.</p>
<p>It is recognised that real estate is a significant contributor to carbon emissions through the construction and operation of buildings. and takes measures to address this. In setting planning policy on sustainable design, given the rapidly changing technologies and approaches, it is important to avoid policy wording that is too inflexible or could conflict with Government legislation and building regulations.</p>	<p>These comments are noted.</p>