

Stewart Patience,  
Spatial Planning Manager  
Anglian Water Services Limited  
Anglian Water,  
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Peterborough,  
Cambridgeshire PE3 6WT

27 January 2021

Dear Stewart

**REMOVAL OF WATER EFFICIENCY STANDARD IN THE PROPOSED MODIFICATIONS TO THE SUBMISSION TENDRING LOCAL PLAN**

We are writing in support of your Written Statement on Matter 8 – Protected Places of the Submission Tendring District Council Local Plan. Affinity Water provides potable water to the majority of Tendring District, which is part of our East region.

Affinity Water considers it is very disappointing that the proposed modification to the submission local plan removes the requirement for 110litres/person/day from Policy PPL5 and leaves the standard to be decided on a case by case basis with reference to yourselves.

The National Planning Policy Framework (NPPF) states that in, in order to achieve the goal of Sustainable Development, the planning system must deliver economic, social and environmental objectives through the preparation and implementation of plans, as well as the policies in the NPPF itself. Paragraph 9 states that *....Planning policies and decisions should play an active role in guiding development towards sustainable solutions....*, taking local circumstances into account.

As identified in your Written Statement, 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 water efficiency measures aiming to achieve 110 litres/person/day.

There is clear local need.

The submission Local Plan states that Tendring *experiences the lowest average level of annual rainfall in the country and therefore maintaining a supply of fresh water for drinking and the irrigation of crops is a high priority*<sup>1</sup>. It goes on to state that the focus will need to be on reducing demand for water by all users.

As you note in your Statement, the Environment Agency 'Water Stressed Areas Final Classification (2013)', 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. Affinity Water's East area has been identified as an area of serious water stress.

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<sup>1</sup> Paragraph 7.5.

The Environment Agency's 2020 policy paper *Meeting our Future Water Needs: A national framework for water resources*<sup>2</sup> notes that the East

*...faces significant pressure and has little water available. Our modelling shows that the amount of water needed is equivalent to all the new supply options selected in the company WRMP<sup>3</sup>s – in this case Anglian Water, Essex and Suffolk water, Affinity Water, Severn Trent Water and Cambridge Water - but more ambitious reductions in water demand and potentially new supply options are necessary to meet the higher need estimate.*

It should be noted that to the best of our knowledge, none of these supply options have yet been granted planning permission.

Removal of the 110/litres/person/day from the policy removes the certainty associated with clearly setting out the standard to be achieved in planning policy. Incorporating the water efficiency requirements into the site layout at the preparation and concept or masterplanning design stages is the most effective and efficient way of achieving the 110/litres/person/day. Having the requirement for 110/litres/person/day clearly set out in local plan policy ensures that it is considered early, and fully integrated into the early design process.

A lack of awareness will result in place-makers designing places to the lower standard of 125/litres/person/day. It is likely to lead to unnecessary and protracted discussions over necessity and viability, wasting both time and resources in the Local Planning Authority and the developer.

Affinity Water supports the Anglian Water Written Statement in full and seeks the retention of the 110/l/p/day as a fundamental tool in managing the supply of water in the long term.

Yours faithfully

Kim Harding MRTPI

Asset Protection Specialist  
Environmental Policy and Strategies

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<sup>2</sup> <https://www.gov.uk/government/publications/meeting-our-future-water-needs-a-national-framework-for-water-resources/meeting-our-future-water-needs-a-national-framework-for-water-resources>

16 March 2020

<sup>3</sup> Water Resources Management Plans

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