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Our ref: RDC DaSA Local Plan
Your ref: DaSA Local Plan
Date: 26 March 2019

Dear Ms Clancy

Rother District Council Development and Site Allocations Local Plan

Thank you for sending information in regards the examination for the above plan. Having reviewed the Examiners main Matters, Issues and Questions document, we note Matter 4 – Development Policies and the question regarding Resource Management.

Policy DRM1Water Efficiency

- Is there sufficient evidence to justify a policy requirement of 110 litres per day as opposed to the mandatory national standard of 125 litres per day, in accordance with Planning Practice Guidance?

We would like to make the following comments:

Residential

All new homes should continue to meet the mandatory national standard set out in [the Building Regulations &c. \(Amendment\) Regulations 2015](#) of 125litres/person/day (l/p/d). Where there is a clear local need, councils can set out local plan policies requiring that new dwellings meet the tighter Building Regulations optional requirement of 110 l/p/d (as set out in the [Planning Practice Guidance](#)).

More information on this can be found in our reports [Water Stressed Areas Classification 2013](#), [River Basin Management Plans](#) or in other local evidence, for example water cycle studies.

Some local councils have previously commented they are concerned about costs to developers if they ask for higher standards. For water efficiency, the cost of achieving 110l/p/d is just £0 - £9 per dwelling, compared to achieving the baseline building regulations standard (125l/p/d).

Tighter Building Regulations are mentioned within new River Basin Management Plans (RBMP) as a measure that can help towards catchments achieving good ecological status.

Commercial/Industrial developments

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption. BRE Environmental Assessment Method (BREEAM) has an 'exemplary performance' standard with 'maximum water credits'. Achieving this standard can be met by the use of low flush toilets, aerated taps, efficient appliances and rainwater recycling.

Water efficiency standards are mentioned within new River Basin Management Plans (RBMP) as a measure that can help towards catchments achieving good ecological status.

Southern Water Services PPC

It is important to note that Rother District is not self-sufficient in regards to potable water supplies and South East Water and Southern Water Services have to import water into the Eastern Area with strategic transfers needed from neighbouring catchments to support their water demand.

It is also worth highlighting that as part of Southern Water demand management options they have a universal compulsory metering programme in place.

Recent research by the University of Southampton suggests customers with a meter use on average 16.5 % less water than those not metered. In 2013/14 45% of homes in England had a meter, and it is expected this will gradually increase to 82% by 2040.

Abstraction

From a local abstraction resource perspective the areas that supply Rother District have been assessed and classified by the Environment Agency's local Abstraction Licensing Strategy (ALS) as either 'Water Not Available' or 'Restricted Water Available', for further details please see the published Rother ALS document:

<https://www.gov.uk/government/publications/rother-catchment-abstraction-licensing-strategy>

Southern Water's Water Resources Management Plan

We have recently commented on Southern Water's revised draft Water Resources Management Plan (WRMP19) strategy for the Eastern Area which covers Sussex Hastings water resource zone.

These plans are produced every five years and set out what supplies are available over 25 years, and compare this to anticipated demands. If there is a gap the WRMP will outline the best options to increasing supplies and reducing demands to close the gap.

In the revised draft the company commit to a strategic scheme known as 'Target 100'. This is water efficiency activity that aims to reduce per capita consumption to 100 litres per day by 2040, commencing at the start of AMP7. Please note the revised draft version hasn't been published on their website yet, only the draft version has here;

<https://www.southernwater.co.uk/media/1360/30-45.pdf> (at the bottom of page 2).

The application of target 100 in the company's revised draft WRMP is described in the plan as 'The company have committed, as part of the draft WRMP, to delivering its 'target 100' water efficiency policy, which aims to achieve a per capita consumption (pcc) of 100l/h/d by 2040 (for clarity, this relates to average household pcc under normal year annual average conditions). This is well-aligned with Defra's 25 Year Environment Plan (Defra, 2018) which states that "We will work with the industry to set an ambitious personal consumption target and agree cost effective measures to meet it".

Environment Agency

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This policy formed a key component of the draft strategy, but has been made more explicit in this revised plan, by drawing it out from the baseline demand forecast as a costed option. The details of the option are described in annex 6.

We trust that this information will be useful in determining the reasons for the policy requirement for 110 l/p/d. In review of the remaining matters, issues and questions document, we consider that we have no further comments to make. As such, we are not proposing to attend any hearing dates, unless of course the Examiner requests our presence.

Please do not hesitate to contact me should you wish to discuss the above.

Yours sincerely

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