

Consultation comments on Policy CN4 – Water Efficiency Standards in New Developments

- Support - 26
- Neither support of object - 6
- Object - 6

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

Comments in support of policy CN4 - water efficiency standards in new developments		
Response ID	Comment	Officer comments
ANON-KSAR-NKTH-6	This needs pushing hard. The lack of investment from the water companies, the shocking sewage outages and the complete lack of teeth by the Environment agency is an outrage.	Support welcomed and comments noted.
ANON-KSAR-N81K-K	The proposed potable water consumption figure of 100 litres per person per day quoted in policy CN 4 is supported and will help to reduce water consumption from new dwellings.	Support welcomed and comments noted.
ANON-KSAR-NKFC-K	Kennedy Wilson recognise the importance of protecting and managing water resources in Winchester and support, in principle, the proposed policy to set standards for water efficiency in new developments. Kennedy Wilson are committed to exploring a range of measures to ensure the delivery of water efficient development at Solent Business Park, from initial design through to delivery and operation.	Support welcomed and comments noted.

	<p>The thrust of the policy aligns with paragraphs 152, 153 and 154 of the National Planning Policy Framework, which seeks to ensure that Local Plans and new developments are proactive in mitigating and adapting to the long term-implications for climate change and water supply. Whilst the policy should set clear and evidenced based requirements it should also provide flexibility to include for site-specific circumstances. This can ensure that the most suitable and deliverable approach can be taken for each site at the point in time that it comes forward, supporting delivery but also climate change and sustainability objectives.</p> <p>As such, Kennedy Wilson propose that the following wording is inserted at criteria ii. of Policy CN4: “Any refurbishments and other non-domestic development should be designed to meet BREEAM water efficiency credits unless it can be demonstrated that it is not feasible or viable”. The above wording would ensure that the expectations and flexibility afforded to residential development in this policy (criteria i.) are equally applied to commercial development and that the policy would align with the text within the relevant “What are we aiming to achieve?” box, which acknowledges that water efficiency standards should be met unless impractical for technical reasons. This would ensure that commercial development is not unduly constrained across Winchester, supporting the Council’s objectives of growing a vibrant local economy.</p>	<p>If a commercial premises is refurbished there is no reasons why the water efficiency standards should not equally apply to them as the SE of England is classified as seriously water stressed area. If this is not possible, it will be necessary for applicants to demonstrate this in the planning application. Allied to this the water usage of a non-domestic premises will often be considerably lower than a residential property.</p> <p>Recommended response: No Change.</p>
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ANON-KSAR-NKDW-5 Littleton and Harestock Parish Council	<p>Littleton and Harestock Parish Council warmly welcomes the intentions to put climate change, adaptation and mitigation at the heart of the Plan's strategy. Given the challenges we face, there is no other option than to address these head on. Of course future practice needs to match the good intentions, but whenever there is a perceived balance between climate considerations and other factors, the imperatives of addressing climate change should be uppermost. Littleton and Harestock Parish Council supports these policies.</p> <p>Support policies CN1-7 inclusive.</p>	Support welcomed and comments noted.
ANON-KSAR-NKYT-Q	<p>However, far more pressure should be put on Southern water to stop the level of leakages and also to prevent unnecessary release of sewage into rivers and streams. Closer liaison between the Council and the Environment Agency, Defra etc., may be required to ensure inspections and testing are put in place to prevent further pollution of our rivers. Furthermore all new developments should have permeable surfaces, not tarmac or huge amounts of paving, for access points and surroundings, there should also be a statutory requirement to plant hedges and trees for carbon capture instead of fences and other barriers around and between buildings, to give shade as well as absorbing excessive rainfall.</p>	<p>Unfortunately, whilst the City Council can raise this matter with Southern Water to stop the level of leakages and preventing the unnecessary release of sewerage into rivers, streams and the sea these matters are beyond the remit of the LP.</p> <p>There are now requirements about the amount of area that you can cover with non-permeable paving which anyone undertaking this work needs to comply with.</p> <p>It is important to read the LP as a whole as there are a range of other LP policies that deal with overheating and absorbing and reducing the impact of rainfall. Recommended response: No Change.</p>
ANON-KSAR-NK2C-Y	Southern Water fully supports this policy as it aligns with our Target 100 program which aims to help our	Support welcomed and comments noted.

<p>Southern Water Link here</p>	<p>existing customers to reduce their water consumption to 100 litres per person per day, whilst we work to reduce network leakage by 40% by 2040. Establishing a 100l/p/d standard for new development will contribute to a more comprehensive approach to driving down water consumption, without which it will be harder to achieve meaningful savings.</p> <p>The supporting text to this policy helpfully highlights the challenge we collectively face in Hampshire in securing a resilient water supply for the future in the face of climate change, population growth and reductions in abstractions from the county's rivers. Promoting water efficiency in new development is a critical step to addressing this, but new water sources also need to be found as part of the solution to maintaining essential supplies to both existing and new homes and businesses.</p>	
<p>ANON-KSAR-N8XY-8</p>	<p>I support these water efficiency standards.</p>	<p>Support welcomed and comments noted.</p>
<p>ANON-KSAR-N85J-P</p>	<p>The proposed potable water consumption figure of 100 litres per person per day quoted in policy CN4 is supported and will help to reduce water consumption from new dwellings.</p>	<p>Support welcomed and comments noted.</p>
<p>ANON-KSAR-N8XG-P</p>	<p>I support the water efficiency standards set out in this policy</p>	<p>Support welcomed and comments noted.</p>
<p>ANON-KSAR-NKFQ-1 Upham Parish Council</p>	<p>This policy should acknowledge the steps necessary to deal with water use in the 95% of dwellings not regulated within the planning system. In particular SW's very unambitious target for dealing with leaks (over the next 15 years only a 40% reduction) should be challenged and seen to be challenged. This is an</p>	<p>Unfortunately, whilst the City Council can raise this matter with Southern Water to stop the level of leakages these are matters that are beyond the remit of the LP. Recommended response: No change.</p>

	unacceptable waste of potable water and the energy needed to create and distribute it.	
BHLF-KSAR-N8TG-J	We are supportive of the Council's vision around water consumption. Excess abstraction from the Test and Itchen causes significant damage to the food chain and habitats.	Support welcomed and comments noted.
BHLF-KSAR-N8BE-X	We support this policy.	Support welcomed and comments noted.
BHLF-KSAR-N8BP-9 Southampton City Council	This Council also supports the focus on climate change within the draft Winchester Local Plan 2039 including the requirement for development to meet BREEAM (Policies CN3 and CN4) and the London Energy Transformation Initiative (LETI) standards (linked to Policies CN2 and CN3).	Support welcomed and comments noted.
BHLF-KSAR-N8ZZ-B	The proposed potable water consumption figure of 100 litres per person per day quoted in policy CN 4 is supported and will help to reduce water consumption from new dwellings.	Support welcomed and comments noted.

Comments which neither support or object to policy CN4 - water efficiency standards in new developments		
Respondent number	Comment	Officer comments
ANON-KSAR-NKS3-G Bishops Waltham Parish Council	CN4 Page 49 4.36 Retrofitting Comment: To help the "Fuel" poverty families, should the authority consider grants for PV arrays. CN4 Page 450 4.40 Question: If we require this large amount of PV etc, it should be a policy for every Business/home (new and old).	Unfortunately, offering grants for PV panels is beyond the remit of the LP. There are, however, a range of other initiatives that are run by HCC whereby you can register your interest for solar buying scheme. The LP can only deal with new development, it cannot apply to existing development

		that already has the benefit of planning permission. Recommended response: No change.
ANON-KSAR-NK29-N	CN4 – Query: How are the requirements for water consumption monitored? What measures will be taken if the finished building fails to comply?	Planning permission will be granted on the basis of 100 litres per person per day. There are a range of low cost items/devises that can be fitted to taps/showers to reduce water consumption (these are usually supplied with all new fixtures). Water bills are increasing and in will be in the interest of the owner of properties to reduce their water consumption. All we can do is to secure this via the planning application process and there will be a financial incentive for the owners of the properties to reduce their water consumption. Recommended response: No change.
BHLF-KSAR-N8TW-2 Eastleigh Borough Council	This Council also supports the focus on climate change within the draft Winchester Local Plan 2039 including the requirement for development to meet BREEAM (Policies CN3 and CN4) and the London Energy Transformation Initiative (LETI) standards (linked to Policies CN2 and CN3).	Support welcomed and comments noted.
BHLF-KSAR-N86T-1 Hampshire County Council (Transport)	The County Council is pleased to see that the issue of climate change is being addressed via a range of policies to address strategic carbon neutrality and designing for low carbon infrastructure, alongside Policy T1 (Sustainable and Active Transport and Travel) and Policy T3 (Promoting sustainable travel modes of transport and the design and layout of parking for new developments) which consider transport issues. The County Council's Climate Change Framework for Strategic Programmes (2020 – 2025) sets out the mitigation and resilience programmes which the County Council will be pursuing. These strategic programmes have been designed to	Support welcomed and comments noted.

	<p>deliver outcomes to reach the County Council's targets in 2050 and are therefore very long term and extensive in nature. The County Council is therefore supportive of the Strategic Policy CN1 (Mitigating and adapting to climate change), Policy CN 2 (Energy Hierarchy), Policy CN 3 (Energy efficiency standards to reduce carbon emissions), Policy CN 4 (Water efficiency standards in new developments), Policy CN 5 (Renewable and low carbon energy schemes), Policy CN 6 (Micro energy generation schemes) and Policy CN 7 (Energy Storage) which are all designed to help mitigate and adapt to climate change and which the County Council considers are all aligned with the key milestones set out in the building and infrastructure theme of the County Council's Climate Change Framework for Strategic Programmes.</p>	
<p>BHLF-KSAR-N86F-K Natural England Link here</p>	<p>Natural England welcomes Policy CN4 that requires all new developments to adopt a higher standard of water efficiency of 100 litres/per person/day, including water use management and conservation measures such as rainwater recycling and grey water harvesting.</p>	<p>Support welcomed and comments noted.</p>
<p>BHLF-KSAR-N86X-5</p>	<p>Gladman note that Policy CN4 seeks to employ a requirement whereby developments will be required to meet a high standard of water efficiency and residential development should be designed to achieve a maximum water capacity use of 100 litres per person, per day. It is noted that this a higher standard than currently required in the adopted development plan and aligns with Southern Water's 'T100 Target'. While the policy is aspirational and seeks to support supply across a water stressed area, it is not apparent how such measures would be implemented</p>	<p>Planning permission would be granted on the basis of 100 litres per person per day. There are a range of devises/items that can be fitted to taps/showers to reduce water consumption (these usually come with any new fixtures). Water bills are increasing and in will be in the interest of the owner of properties to reduce their own water consumption. This water efficiency standard would be secured via the planning application process and there will be added financial incentive for the owners of the properties to</p>

	<p>and managed. Further guidance in the form of an SPD might help support and provide clarity on such a policy requirement.</p> <p>The viability assessment provides fleeting reference to adopting such a standard and that it would result in a nominal cost according to DSP research. It would be prudent for this research and evidence to be provided as part of the viability assessment.</p>	<p>reduce their own water consumption. The situation will be monitored but at this stage it is considered that an SPD on this specific issue is required but this may be picked up at a later stage in a wider sustainable development SPD. Recommended response: No change.</p> <p>From discussions with the council's LP Viability consultants has indicated that water capacity use of 100 litres/per person/per day will not have any viability implications. Recommended response: No change.</p>
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Comments which object to policy CN4 - water efficiency standards in new developments		
Respondent number	Comment	Officer comment
ANON-KSAR-NKJV-A	<p>Bloor Homes acknowledges the issues faced in Winchester district around water stress and acknowledges that draft Policy CN4 provides for situations where 100 litres/person/per day is not feasible. However, there is no reference in the supporting text to the evidence that supports this policy, nor does such evidence appear to be on the council's local plan evidence webpage. As such the draft policy is not justified.</p>	<p>The South of East of England is a water stressed area https://www.southernwater.co.uk/our-story/our-plans/water-for-life-hampshire/welcome-to-water-for-life-hampshire Policy CN4 is fully in alignment with Southern Water's Target 100 program which aims to help existing customers to reduce their water consumption to 100 litres per person per day. Establishing a 100l/p/d standard for new development will contribute to a more comprehensive approach to driving down water consumption, without which it will be harder to achieve meaningful savings.</p> <p>https://www.southernwater.co.uk/water-for-life/target-</p>

	<p>The practical implications of achieving such a standard should not be underestimated and whilst Bloor Homes encourages water efficiency in new development, there is a need for a wider behavioural shift to support such a move which is beyond the remit of the development industry.</p>	<p><u>100</u> Recommended response: No change.</p> <p>This water efficiency standard would be secured via the planning application process and there will be a financial incentive for the owners of the properties to reduce their own water consumption.</p> <p>Recommended response: No change.</p>
<p>ANON-KSAR-N8M7-U</p>	<p>This policy requires residential development to achieve a maximum water capacity use of 100 litres per person per day (lppd). The technical standards that can be introduced within local plans are set out in PPG and include higher standards with regard to water use. Where there is evidence to support their introduction, the Government allow local planning authorities to require a higher standard of 110 lppd in their local plans. Therefore, in order to be consistent with national policy the Council should amend this policy to require maximum of 110 lppd.</p>	<p>The South of East of England is a water stressed area https://www.southernwater.co.uk/our-story/our-plans/water-for-life-hampshire/welcome-to-water-for-life-hampshire Policy CN4 is fully in alignment with Southern Water's Target 100 program which aims to help existing customers to reduce their water consumption to 100 litres per person per day. Establishing a 100l/p/d standard for new development will contribute to a more comprehensive approach to driving down water consumption, without which it will be harder to achieve meaningful savings.</p> <p>https://www.southernwater.co.uk/water-for-life/target-100</p>

		<p><u>100</u> Recommended response: No change.</p> <p>This water efficiency standard would be secured via the planning application process and there will be a financial incentive for the owners of the properties to reduce their own water consumption.</p> <p>Recommended response: No change.</p>
ANON-KSAR-NK3N-B	<p>South Wonston Sustainability welcomes a policy to improve water management, but the draft policy needs amending. Imposing the need to have refurbished homes obtain BREAMM credits will add to all types of refurbishment projects, including retrofitting energy efficiency improvements to existing housing. Homeowners should be incentivised to take on the extra cost of retrofitting and improving water efficiency.</p>	<p>Southern Water already offer a free service to anyone that wishing to reduce their water consumption https://www.southernwater.co.uk/help-advice/how-to-save-water/water-saving-home-visits</p> <p>These home visits and the devices that they offer as part of this service can substantially reduce water consumption which there is a now an added financial incentive to do with the cost of living crisis.</p> <p>Recommended response: No change.</p>
ANON-KSAR-N81F-E	<p>Bargate Homes support this policy in principle. Some flexibility is needed in regard to the standards, for example, achieving BREEAM Excellent for water efficiency may not be feasible in relation to conversion of heritage assets or other existing buildings, and therefore, could undermine other objectives of the Plan, such as the brownfield first policy.</p>	<p>Reducing water consumption whether in a designed/undesignated heritage asset is no different from a building that is not designated/undesignated as water efficiency devices can be added to any building. It is important to read the LP as a whole and it is not considered that Policy CN4 would undermine other objectives of the Plan especially as the South East of England is in a water stressed area. Recommended response: No change.</p>
ANON-KSAR-NKKV-B	<p>Water is a strategic resource which is likely to get scarcer in Winchester District as the climate warms. Therefore developments must be reviewed to ensure they do not place any additional strain on water resources. Private water extraction should be regulated and a presumption of prohibition should be the norm.</p>	<p>Support welcomed and comments noted. Private water extraction is covered by separate legislation.</p> <p>Recommended response: No change.</p>

<p>BHLF-KSAR-N86N-U</p>	<p>Supported in principle. Some flexibility is needed in regard to the standards, for example, achieving BREEAM Excellent for water efficiency may not be feasible in relation to conversion of heritage assets or other existing buildings, and therefore, could undermine other objectives of the Plan, such as the brownfield first policy.</p>	<p>Reducing water consumption whether in a designed/undesigned heritage asset is no different from a building that is not designated/undesigned as water efficiency saving devices can be added to any building. It is important to read the LP as a whole and it is not considered that Policy CN4 would undermine other objectives of the Plan especially as the south east of England is in a water stressed area. Recommended response: No change.</p>
<p>BHLF-KSAR-N863-Z</p>	<p><u>Policy CN4 Water efficiency standards in new developments</u></p> <p>Policy CN4 sets a maximum water capacity use of 100 litres/person/day from supply for all new residential development. The Council's Local Plan Viability this cost is 'nominal' but provides no detail what measures have been assumed to meet this target (for example, is grey water recycling included). The Council should include the associated cost as part of its Viability</p>	<p>The Council's LP Viability consultants have worked with several LPA's seeking water efficiency measures beneath 100lpppd in their Local Plans. According to their research, typically the costs ramp up where significantly more stringent water usage restrictions are required. For example, to achieve <80-85lpppd requires significant interventions (normally in the form of rainwater harvesting / grey/blackwater recycling onsite etc) with associated significant additional costs. Greywater recycling systems capture and recycle used water from showers, baths and basins but requires separate plumbing for capture, treatment and then recycling. There are no exact costings for each level of water usage restriction (and some conflicting information) but water efficiency measures down to around the optional building regs 110lpppd and below (but above around 85 – 100lpppd) are likely to be met through water efficient devices such as flow restrictors on taps, low-flush toilets, showers etc, smart meters and behavioural change. These come with much lower costs, typically around £20/dwelling which we would consider forms part of general costs</p>

		allowances. It is not a cost that would make an otherwise viable scheme unviable. This explanation will be included in the LP Viability Assessment. Recommended response: No change.
ANON-KSAR-NKUB-1	We as a Council and this includes Developers need to make better provision for the Saving of water and how we as a District save of water usage!	Comments noted and support welcomed as this is a key priority of the LP. Recommended response: No change. Policy CN4 has been aligned with Southern Water's T100 target. As Southern Water are the statutory agency for the supply of portable water this is considered to be the best approach for a Local Plan policy. Recommended response: No change.
ANON-KSAR-NKZ5-S	It is insufficient just to get a water efficiency credit when the lowest credit is only a 12.5% improvement. The standard should be set to BREEAM Credits 5 (55%) or above to ensure climate and biodiversity crises are mitigated to a higher standard. This will also reduce running cost for occupants.	
ANON-KSAR-N819-1	Given the environmental crises, it is insufficient just to get a water efficiency credit when the lowest credit is only a 12.5% improvement. The standard should be set to at least a BREEAM Credits 5 (55%) or above to ensure climate and biodiversity crises are mitigated to a higher standard. This will also reduce running cost for occupants.	See above response.

	Recommendations	Officer response
Comments from SA/HRA	No recommendations provided	N/A

Amendments to policy CN4

No changes to policy

Amendments to supporting text

Remove the title above paragraph 4.36 '**Retrofitting to reduce carbon emissions**'.

Paragraph 4.39 Add '**2008**' after the words 'A Renewable Energy Study' in order to make it clear that paragraph 4.39 relates to this study and not the 2022 study.

Page 51 - In order to avoid any potential confusion, remove the heading at the top of the page '**Community Energy Schemes**'.