



The voice for water consumers
Y corff sy'n rhoi llais i ddefnyddwyr dŵr

CCW's response to MCLG Consultation on Planning

October 2020

CCW response to the Planning for the Future Whitepaper October 2020

1. Introduction

The Consumer Council for Water (CCW) is the statutory, independent voice for water consumers in England and Wales. We campaign on behalf of both household and non-household water consumers.

2. Executive Summary

- There is a need for 3,435 million litres of water to address future pressures on water resources (including population growth) if no action is taken between 2025 and 2050. Forecasts suggest that around 50% of this requirement is needed in the South East.
- Increasing pressures on water resources can be partly eased by demand management measures, including water efficiency. All new developments should be designed and built to high water efficiency standards, particularly in areas deemed to be in 'serious water stress'.
- Reducing hot water use at home can have wider benefits, including lower energy bills, lower water bills (for customers who are on a meter) and reducing household carbon emissions.
- The upcoming Drainage and Wastewater Management Plans will provide the basis for collaborative, long-term planning for different parties that are responsible for drainage, flooding and protecting the environment. Although water companies are responsible for these plans, other stakeholders (like planners) can contribute to their development. We support the use of SuDS and/or flood prevention measures to build and improve local resilience.
- We would like to see overall net gain to the environment due to development.

3. Detailed Response

Water resources availability

The recently published National Framework for Water Resources¹ states that an additional 3,435 million litres of water will be needed to address future pressures on water resources (in England) if no action is taken between 2025 and 2050. This amount includes 1,049 million litres per day to supply a growing population, plus water to make water supplies resilient to drought and to address the impacts of climate change. It is also expected that around 50% of the requirement will be needed in the South East.

For this reason, we think it is necessary that when new development is being planned it takes water availability considerations into account – to ensure there is enough water for everyone, including the environment, today and in the future.

¹ Environment Agency (2020). Meeting our Future Water Needs: a National Framework for Water Resources. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/873100/National_Framework_for_water_resources_summary.pdf

Water efficiency measures

These increasing pressures on water resources from growth can be partly eased by demand management measures, including water efficiency. For this reason, all new developments should be designed and built to high water efficiency standards, particularly in areas deemed to be in 'serious water stress'². But, to achieve the greatest benefit, it is imperative to consider how these water efficiency standards are achieved in practice. This is not just about installing efficient fittings and fixtures,- it is also about engaging with residents to explain why saving water is important and providing practical water efficiency advice.

The benefits are greater if this includes combined water and energy efficiency advice – saving hot water can help to reduce water bills (for metered customers) and energy bills, and can also help to reduce domestic carbon emissions. Hot water use at home (from showers and taps) is the second largest source of household greenhouse gas emissions, after space heating, accounting for 17% of home energy use³.

Recent analyses⁴ suggest that the single most cost effective intervention to save water would be to introduce a mandatory, independent water efficiency label displayed on all water using products at the point of sale. The benefits would be greater if the label was linked to tighter Building Regulations and water supply fitting regulations.

Wastewater

On the wastewater side, the upcoming Drainage and Wastewater Management Plans (DWMPs) will provide the basis for collaborative, long-term planning between parties that are responsible for drainage, flooding and for protecting the environment. Although local water companies will lead these plans, there is an expectation for other organisations to contribute in their development. These should include planners. It is expected that these plans can achieve benefits including⁵: increased resilience to flooding, mitigation and adaptation to climate change, enhancing the environment, providing environmental net gain, and looking after the health and wellbeing of local communities.

CCW supports the use of sustainable drainage systems (SuDS) and/or flood prevention measures to build and improve local resilience. The use of these schemes can help to reduce the risk of surface water and/or sewer flooding, as they can help to store and attenuate excess surface water and reduce the amount of surface water that enters sewers.

We would expect that any known capacity issues in the local sewer network should be addressed before planning permission is granted. Drainage networks also require clear ownership and maintenance responsibilities to ensure an adequate operation of the network.

² These areas are described in detail in this document:

<https://www.gov.uk/government/publications/water-stressed-areas-2013-classification>

³ Committee on Climate Change (2019) UK housing, fit for the future? Available at:

<https://www.theccc.org.uk/publication/uk-housing-fit-for-the-future/>

⁴ Artesia, Eftec (2019) for Water UK. Pathways to long-term pcc reduction. Available at:

<https://www.water.org.uk/wp-content/uploads/2019/12/Water-UK-Research-on-reducing-water-use.pdf>

⁵ <https://www.water.org.uk/wp-content/uploads/2019/09/Working-together-to-improve-drainage-and-environmental-water-quality-an-overview-of-Drainage-and-Wastewater-Management-Plans.pdf>

Building regulations

We think that Building Regulations should be tightened in water stressed areas to allow higher, more efficient standards to help reduce personal water use (as long as these do not impact on consumers' quality of life). To achieve a consistent approach, the adoption of any modified standards should not be left to the discretion of councils alone.

Protecting the environment

Finally, we would like to see overall net gain to the environment due to development. Many of the aspects that are mentioned in this response would help to protect and improve the local environment and to mitigate and adapt to climate change and in turn will contribute to the health and well being of local communities.

Enquiries

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