

From: Hilton, Warren

Sent: 18 October 2021 14:18

To: planningpolicy <planningpolicy@lancaster.gov.uk>

Subject: Aldcliffe with Stodday Neighbourhood Plan

Dear Gillian,

Thank you for your email regarding the consultation on the submission version Neighbourhood Plan for Aldcliffe with Stodday.

There are no comments that National Highways wishes to make on the Neighbourhood Plan.

If you would like to discuss anything about this email, please contact me.

Kind regards,

Warren Hilton, Assistant Spatial Planner

Operations North West Spatial Planning Team

National Highways | Piccadilly Gate | Store Street | Manchester | M1 2WD

Web: www.highwaysengland.co.uk.



The Coal
Authority



INVESTOR IN PEOPLE



RTPI
Learning Partner

200 Lichfield Lane
Berry Hill
Mansfield
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Tel: (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: Planning and Regeneration Team
Lancaster City Council

[By Email: planningpolicy@lancaster.gov.uk]

09 November 2021

Dear Planning and Regeneration Team

Aldcliffe with Stodday - Neighbourhood Plan

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on it.

Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.

Yours sincerely

Christopher Telford BSc(Hons) DipTP MRTPI
Principal Development Manager

Contact: highways@lancashire.gov.uk

Date: 18 November 2021

Dear Lancaster Local Planning Authority,

ALDCLIFFE WITH STODDAY NEIGHBOURHOOD PLAN CONSULTATION RESPONSE

Thank you for inviting Lancashire County Council's Flood Risk Management Team to comment on the above consultation. Lancashire County Council is the Lead Local Flood Authority (LLFA) for the County Council's administrative area. The Flood and Water Management Act (FWMA) sets out the requirement for the LLFA to manage 'local' flood risk (flooding from surface water, groundwater, and ordinary watercourses) within their area.

The Lead Local Flood Authority have reviewed the Aldcliffe with Stodday Neighbourhood Development Plan 2021-2031 Submission Plan, and have the following comments:

Policy AS7: Sustainable Design

Paragraph 2 should be changed to reference sustainable drainage systems. It is recommended that this paragraph reads as follows:

2. Development must provide high quality multifunctional sustainable drainage systems and should not increase pressure on existing wastewater and natural drainage systems in accordance with NDP Policy AS8.

Policy AS8: Surface Water Drainage

The LLFA are happy to see a specific surface water policy included at the neighbourhood plan level. We note that this policy has been added after consultation with United Utilities. We recommend that this policy is progressed further and updated to match the equivalent policy in the emerging Climate Emergency Local Plan for Lancaster City, to provide high quality multifunctional sustainable drainage systems in the neighbourhood. Mainly, the drainage hierarchy should move away from emphasising underground components, including soakaways, as these pose challenges for ensuring maintenance for the lifetime of developments. The policy should be updated as follows:

Applicants must demonstrate that surface water from new development is managed through multifunctional SuDS systems and accords with the following in accordance with the Surface Water Sustainable Drainage Hierarchy and the Planning Practice Guidance:

- i. Re-use and reduce surface water run-off through rainwater harvesting / green walls/roofs,

- ii. Infiltration using surface components such as permeable surfaces, infiltration basins, swales and trenches, wetlands etc.,
- iii. Attenuation above ground in ponds or water features for gradual release into infiltration features and if this is not possible to a watercourse,
- iv. Attenuate surface water via soakaways or storage in tanks or sealed water features for gradual release into infiltration features and if this is not possible a water course,
- v. In exceptional cases, controlled discharge to a sewer or other drainage system, via above ground attenuation, and if this is not possible, underground attenuation.

Surface water should be managed through the provision of above ground sustainable drainage features with multi-functional benefits as part of an integrated high-quality green and blue environment.

SuDS Design should follow the DEFRA Technical Standards for Sustainable Drainage Systems (or any future replacement) and guidance in CIRIA C753 The SuDS Manual (2015) (or any future replacement).

Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available as part of the determination of their application.

Where appropriate, development should incorporate SUDS which avoids all non-permeable surfaces or delivers a water management system which minimises surface water run-off and ensures that all surface water is addressed within the site boundary. Every option should be investigated before discharging surface water into a public sewerage network, in line with the surface water hierarchy.

I hope that you find these comments valuable. Should you wish for further information or clarification to the contents of this letter please contact us on the email address provided.

Yours faithfully,

Phil Wadley

Lead Local Flood Authority

From: SM-Defra-Cheshire2 Lancashire <Cheshire2.Lancashire@defra.gov.uk>
Sent: 26 November 2021 16:16
To: planningpolicy <planningpolicy@lancaster.gov.uk>
Subject: Aldcliffe with Stodday Neighbourhood Plan

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Aldcliffe with Stodday submits its Neighbourhood Plan

Thank you for your consultation on the above dated 17 October 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Regards,

Helen

Helen Rogers
Cheshire, Greater Manchester, Merseyside & Lancashire
Natural England, Hornbeam House, Electra Way
Crewe, CW1 6GJ

<http://www.gov.uk/natural-england>





26th of November 2021

Dear Aldcliffe with Stodday Parish Neighbourhood Planning Team,

MMO Marine Planning response to the Submission version of the Neighbourhood Development Plan (NDP) for Aldcliffe with Stodday Parish and Neighbourhood area.

Thank you for giving us the opportunity to comment on the Regulation 14 Consultation of the Carnforth neighbourhood plan. The comments provided within this letter refer to the document entitled “Submission version of the Neighbourhood Development Plan (NDP) for Aldcliffe with Stodday Parish and Neighbourhood area”

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend from the mean high water spring tides mark (which includes the tidal extent of any rivers and estuary) to the inshore (up to 12nm) and offshore (12 to 200nm or the Exclusive Economic Zone) waters; there is an overlap with terrestrial plans which generally extend from the mean low water springs mark.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO’s licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the [North West Marine Plan](#) is of relevance. The North West Marine Plan covers the area from the Solway Firth to the River Dee, including the tidal extent of any rivers within this area.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act 2009](#) and any relevant adopted Marine Plan, in this case the [North West Marine Plan](#), or [UK Marine Policy Statement \(MPS\)](#), unless relevant considerations indicate otherwise.

Local authorities may also wish to refer to our [online guidance](#), [Explore Marine Plans](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

Marine Licensing

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the [UK marine area](#). The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters.

The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

Summary notes

Please see below suggested policies from the [North West Marine Plan](#) that we feel are most relevant to your local plan. We recommend considering reference to these policy areas within the supporting policy text.

These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the [North West Marine Plan](#) is completed.

- Water quality, landscape and seascape, marine protected areas, biodiversity, heritage assets, tourism and recreation, disturbance, access, and marine litter policies.

Further points to note

Within the above-mentioned document, you make no reference to the Marine Management Organisation or the relevant [North West Marine Plan](#). Under the Marine and Coastal Access Act, any authorisation or enforcement decisions must be made in accordance with the marine plan. Any other decisions which may impact the marine area must have regard to the relevant marine plan. Reference to the Marine Management Organisation and [North West Marine Plan](#) could be best placed in Section 1 of the document where you discuss other local plans and the National Planning Policy Framework of which you need to have regard to.

We would also recommend that the document contains a reference to the duty to co-operate with the Marine Management Organisation.

As previously stated, these are recommendations and we suggest that your own interpretation of the draft North West Marine Plan is completed. We would also recommend you consult [Explore Marine Plans](#), our marine planning portal, for further information.

Once again, thank you for providing the opportunity to comment.

Yours sincerely,

Rachel Thirlwall
Marine Planner (North West)



**Representation to ALDCLIFFE WITH
STODDAY NEIGHBOURHOOD PLAN**
Regulation 14 Publication Consultation

Representations to Aldcliffe with Stodday Neighbourhood Plan:

Regulation 14 Consultation

March 2021

On behalf of Aldcliffe Hall Estates

This representation is presented on behalf of our client, Aldcliffe Hall Estates, who are landowners with a significant interest of land on the boundary of the village of Aldcliffe. A few years ago the Estate secured planning consent for a small scale residential development in Aldcliffe that was successfully built-out providing six new high-quality family homes. A second application that sought to do similar was recently dismissed at appeal, due largely to the impact on the adjacent property and landscape to the south of Aldcliffe. The comments made here are presented with a view to further discussion with the Parish Council as to the future use of their landholding and engagement with the Neighbourhood Plan.

An objective of the draft Neighbourhood Plan is ‘to consider appropriate small scale housing development to meet local needs, ensuring it is sensitive to the local built and landscape context and with associated improvements in community facilities and infrastructure’, which will be delivered through Policies AS3 and AS4. We support the general approach of this objective, but question the policies that derive from it and their likely consequences.

The need for new housing development is outlined in the Neighbourhood Plan, and is discussed below, but the delivery of new homes through Neighbourhood Plans is framed by Policy SP6 of the Lancaster Local Plan Site Allocation document. This requires a minimum of 577 new homes across the district be delivered between 2011 and 2031 from an additional supply that includes Neighbourhood Plans. Paragraph 20.6 of that development plan document references the Aldcliffe with Stodday Neighbourhood Plan area along with other designations made for other plans, most of which are yet to come forward. The paragraph states that “for those that are seeking to address the supply of housing, the Council will expect groups to proactively and positively plan for housing growth in their areas and in accordance with national guidance on neighbourhood planning.

The draft Neighbourhood Plan does not propose to allocate sites for development, but the objective above does propose meeting housing need through specific draft policies, which should therefore direct new sites to come forward for development. It is important therefore in this context and the need for the Neighbourhood Plan to be consistent with policy that the draft policies are scrutinised and assessed for their likely effectiveness.

Paragraph 7.10 of the Neighbourhood Plan states that there was little evidence to support a site allocation for new housing in the plan, with proposals for new residential development instead being determined in accordance with the Policies in the Local Plan, and a criteria based, more locally relevant policy in the Neighbourhood Plan. It is not known what 'little evidence' means in this context, or indeed what assessment the Neighbourhood Plan has made of the potential for small sites to come forward that would be consistent with the draft policy and therefore deliverable.

Policy AS3 relates to the design of new development, with detailed guidance provided as to views, gateway features, pattern of buildings, public realm and landscaping. Policy AS4 goes deeper into the design of height, materials and architectural styles. Both of these policies are helpful in guiding a developer to design a scheme that would be appropriate to the area and acceptable to the local residents. However, policy AS5 states that limited small scale housing will be supported in the Parish, with a list of eight criteria. These relate to units of up to 3 dwellings on small infill sites, conversions or on previously developed land. To our knowledge, there are no such sites in the settlement boundary of the village that would meet this criteria. Has any assessment been done to identify if such sites exist, or if they would be available for development?

None of the above policies actually help to identify such sites or where development should go, which is a key element of the Neighbourhood Planning process and the draft objective of the plan to consider small scale housing development to meet local needs. Has any work been undertaken to identify where development could be located in the village? If not, the Neighbourhood Plan is missing an important step and will not meet its intended purpose, nor be consistent with the development plan or contribute to the achievement of sustainable development.

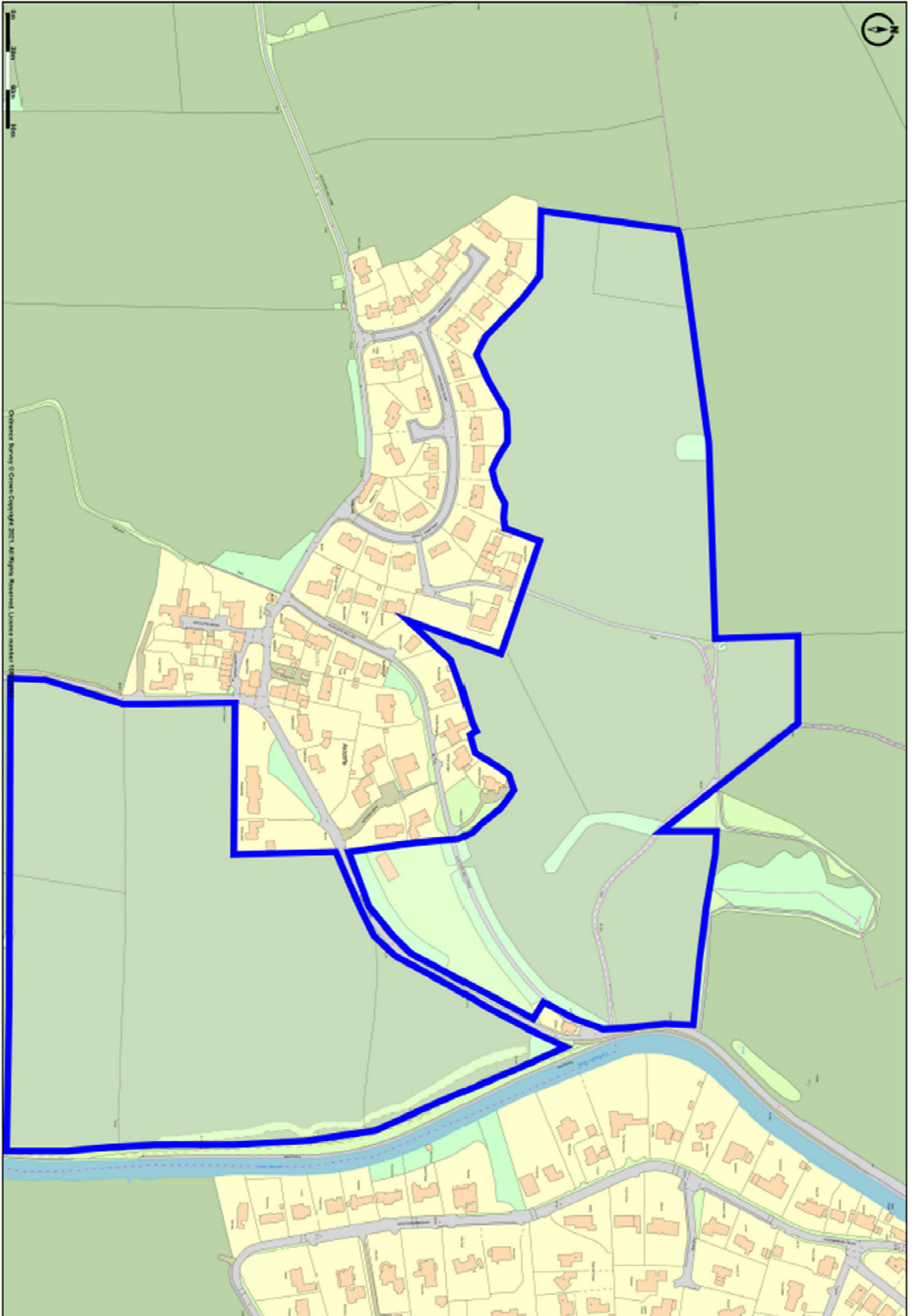
The Development Management DPD, at Paragraph 14.8, expects all Neighbourhood Plans to include proposals for monitoring the policies in the plan and should in due course this indicate that development is not coming forward, action will be taken by the Council to bring forward sites through the wider plan. We note that monitoring is provided in the Neighbourhood Plan, but under Policy AS5 it refers to a target of 100% for the number of smaller 1-3 bedroom homes delivered. This target however appears to have no figure against which to measure it to a percentage as there is no specific number of new dwellings proposed nor any allocated sites, as discussed above.

Paragraph 7.11 of the Neighbourhood Plan does detail overwhelming support in the Parish for smaller housing units, with 78% agreement, but states that in order to be in general conformity with the Local Plan, development should be small in scale and implies that small in scale would be extensions to existing buildings, conversions or up to 3 dwellings on infill sites. There is no indication as to where these definitions of small scale come from, whether these were indicated in the consultation questions, and as above we consider that these very narrow definitions limit any development coming forward in the Neighbourhood Plan area.

A further objective of the Neighbourhood Plan is to seek improvements in community facilities, as it identifies that there are no community facilities or areas of public open spaces, such as village green or play area in the Parish, or for instance a Village Green, picnic area or community meeting space. Again, no proposals are put forward for allocation of land to achieve this in the Neighbourhood Plan.

In light of the matters above, and as our client are major landowners in the village of Aldcliffe, we attach with this submission details of our client's ownership and request discussion with the Parish Council about the future of this land. As outlined, our assessment of the village is that there are no sites within the settlement boundary that would comply with draft policy AS5 and therefore any future development will need to be brought forward on the edge of the settlement, of any scale for new housing or community facilities or open space. We present this land to open discussion on possible locations for small scale development and community space to provide sustainable development for the village of Aldcliffe.

As part of the recent proposals for development to the south of the village, dismissed on appeal, a proposed new access road into a development site has been shown to be acceptable in Highway terms, which could provide new housing to the north of the settlement. We propose that this could be a starting point for discussions, but welcome any comments regarding the future of this land or any land in our client's ownership, in the context of the Neighbourhood Plan that seeks to provide for new housing and community facilities in Aldcliffe with Stodday.



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By email only: planningpolicy@lancaster.gov.uk

Lancaster City Council
Planning and Housing Policy Team
Lancaster Town Hall
Lancaster
Dalton Square
LA1 1PJ

Your ref:

Our ref:

Date: 26-NOV-21

Dear Sir / Madam

LANCASTER CITY COUNCIL – ALDCLIFFE WITH STODDAY NEIGHBOURHOOD PLAN (September 2021)

Thank you for your consultation seeking the views of United Utilities as part of the Neighbourhood Plan process. We note that there are no proposed development allocations within the neighbourhood plan. It is important that United Utilities is consulted at an early stage and kept aware should you look to allocate any sites in the future, over and above the allocations determined by the council in the wider development plan for Lancaster.

We encourage you to direct future developers to our **free pre-application service** to discuss their schemes and highlight any potential issues by contacting:

Developer Services – Wastewater
Tel: 03456 723 723
Email: WastewaterDeveloperServices@uuplc.co.uk

Developer Services – Water
Tel: 0345 072 6067
Email: DeveloperServicesWater@uuplc.co.uk

Existing Water and Wastewater Infrastructure, and Land Owned by United Utilities

We note reference at Paragraph 3.3 to the wastewater treatment works (WwTW) to the west of Stodday and the statement that this infrastructure development is outside the remit of the NDP. We seek clarification on what is meant by this being outside the remit of the NDP, as we would seek to ensure that the Neighbourhood Plan ensures due regard is given to underground utility infrastructure and any development proposals that may come forward in proximity to the treatment works.

We wish to highlight that there is existing wastewater infrastructure, which is located within and passes through the defined Neighbourhood Plan boundary. This includes significant strategic wastewater infrastructure. All our infrastructure must be carefully considered in any development proposals. We will need unrestricted access for operating and maintaining our infrastructure and we will not permit

development over or in close proximity to it. We note the inclusion of proposals for Biodiversity Net Gain (BNG) for the creation of a wildlife haven on land adjacent to United Utilities' satellite sewage pumping station in Appendix 2. This land does not appear to be specifically identified and we would be grateful for clarification as to which land this relates. Development and biodiversity proposals near to our assets will need to leave access for maintenance, repair and replacement of these assets, and careful consideration will also need to be given to any landscaping and changes of levels in the vicinity of our assets. BNG should not be located on top of our assets in order to most appropriately safeguard the future and longevity of the BNG. We would therefore request the opportunity to discuss the location of the proposed BNG in greater detail with a representative of the Parish Council so that this can be considered against our asset records in the first instance.

We suggest the below text for inclusion in the Neighbourhood Plan.

'The Neighbourhood Plan defined boundary includes water and wastewater infrastructure, including some strategic infrastructure. Development proposals will need to take full account of water and wastewater infrastructure in the site design, including landscaping and any changes in site levels, and in the construction processes. The applicant will need to ensure appropriate access and the incorporation of protection measures in accordance with the requirements of United Utilities. Biodiversity net gain shall not be located on top of existing utility assets in order to allow for future access and maintenance.'

We wish to note the land in the ownership of United Utilities within the defined Neighbourhood Plan boundary. Development layouts should have full regard to land owned by United Utilities and ensure that any right of access to this land is maintained. Our land ownership includes Lancaster Wastewater Treatment Works and Stodday Pumping Station on Lunecliffe Road.

We also wish to note Lancaster Wastewater Treatment Works as a waste management facility, it is an industrial operation which can result in emissions. These emissions can include odour and noise. Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.

The position of United Utilities is that when considering future development needs, it is more appropriate to locate development away from wastewater treatment works. This is especially important, but not limited to, uses which are traditionally defined as more sensitive receptors, which include new housing.

In accordance with Paragraph 187 of the National Planning Policy Framework, we recommend that the Neighbourhood Plan should include a policy which ensures the careful consideration of new development proposals near to existing businesses and operations. Development proposed in the vicinity of our wastewater treatment works may need to be supported by appropriate impact assessments (for example, relating to odour and noise) and may need to put suitable mitigation measures in place to avoid a significant adverse effect on occupiers or users of the proposed development. Our recommended policy wording is below.

'Applications will be expected to demonstrate that new development can be integrated effectively with existing businesses and community facilities. This may include the submission of appropriate impact assessments. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant will be required to provide suitable mitigation before the development is brought into use.'

Sustainable Drainage

With respect to sustainable drainage, we are supportive of the inclusion of Policy AS8: Surface Water Drainage. However, we believe there is also an opportunity for the local community to specifically prioritise sustainable drainage systems which are an integral of the landscape design process over traditional underground piped and tanked storage systems allowing for attenuation features which are multi-functional and can be used for biodiversity and recreation. We wish to suggest the addition of the following policy wording to Policy AS8:

'Sustainable Drainage must be considered early in the design process and they should be integrated with other aspects of a site design. New development proposals will be expected to incorporate site drainage as part of a high quality landscaped environment. Applicants will be expected to manage surface water through sustainable drainage features with multi-functional benefits in preference to a reliance on underground conventional piped and tanked storage systems. Any sustainable drainage system should be designed in accordance with 'Ciria C753 The SuDS Manual' or any subsequent replacement guidance.'

We recommend that the policy incorporates a specific section on sustainable drainage which is reflective of the above policy and the content in the National Model Design Code Part 2 Guidance Notes specifically Section N.2.ii Sustainable Drainage which can be found [here](#)¹. This approach should be reflected in the associated design code for the area.

Water Efficiency

Building Regulations Part G includes an optional standard for water efficiency of 110 litres per person per day (l/p/day) for new residential development which can be implemented through local planning policy where there is a clear need based on evidence. In this regard we have enclosed evidence prepared by Water Resources West to support the adoption of the Building Regulations optional requirement for local authorities in North West England and the Midlands. We therefore recommend the inclusion of the following policy in the emerging Neighbourhood Plan:

'All new residential development must achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day.'

We wish to highlight that improving water efficiency makes a valuable contribution to water reduction as well as carbon reductions noting that water and energy efficiency are linked. We also wish to note the associated social benefits by helping to reduce customer bills.

Moving forward, we respectfully request that United Utilities continues to be consulted for all future planning documents. In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me.

Yours faithfully

Andrew Leysens
Planning, Landscape and Ecology
United Utilities Water Limited

Encl. Water Resources West Evidence

¹ <https://www.gov.uk/government/publications/national-model-design-code>

WATER EFFICIENCY IN NEW HOMES

Evidence to support adoption of the Building Regulations Optional Requirement for local authorities in North West England and the Midlands

Background

Water is essential for life - yet here in the UK (as in many regions across the world) the future availability of water is a concern. The area covered by Water Resources West is an area the Environment Agency has described as having ‘moderate water stress’; water scarcity/stress occurs when demand is high compared to the water that is available¹.

Population growth, climate change and environmental protection measures all put pressure on water resources and contribute to water stress in our region. On top of this, housing shortages mean that lots more housing is needed today and in the future. Hence, planning policy is a vital tool to help ensure long term sustainable management of water supplies, as well as helping protect our local rivers and wildlife. Achieving a balance between these conflicting demands is a challenge for us all.

Water Efficiency Standards for New Homes

The Code for Sustainable Homes was launched in 2006 to help reduce UK carbon emissions and create more sustainable homes; it was the national standard for use in the design and construction of new homes in the UK and is still referred to in older Local Plans. In 2015 it was withdrawn and some of its standards were consolidated into Building Regulations including the requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In the same year, the Government updated Building Regulations Part G, introducing an ‘optional’ requirement of 110 l/p/day for new residential development, which should be implemented through local policy where there is a clear need based on evidence. (See [Appendix 1](#)).

In 2018, Welsh Government amended building regulations so that new builds are built to a standard of 110 l/p/d². In England however the standard of 110 l/p/d needs to be adopted as a local policy by each planning authority in its local plan before it can take effect.

In 2020, the government published a White Paper on future planning³ in England. The focus is on clear requirements and standard approaches. It clear that water will remain an important consideration and that “sustainable development” will be a key test.

The Need for Water Efficiency in New Homes

The Water Framework Directive (WFD) was adopted into UK Law in 2003. It was designed to change water management for the better by putting aquatic ecology at the heart of all management decisions. One of the most important features of the WFD is that it encourages public consultation, meaning everyone can have a say in what is needed to protect our water resources. It also takes into account the environmental, economic and social implications of any such investment/decisions.

Delivery of the WFD objectives in our region is set out in River Basin Management Plans for the Solway Tweed, North West, Dee, Severn and Humber River Basins. These documents highlight a number of issues that are affecting the achievement of the WFD objectives, one of these is the pressures from water supply. Thus, there are a variety of reasons why water efficiency is important for Local Authorities.

¹ [Water stressed areas – final classification](#), Environment Agency and Natural Resources Wales, July 2013

² [The Building \(Amendment\) \(Wales\) Regulations 2018](#)

³ [Planning for the future](#), Ministry of Housing, Communities and Local Government, August 2020

Local Authorities have a duty of care for communities and the environment and the reduction in water use can help to minimise the quantity of water taken from the environment as well as helping to control customer bills. There are some important factors to consider in this regard:

- The general Duty to Co-operate⁴ can also apply to water efficiency and, across the region, there are several examples of exemplar project partnerships between Local Authorities and water companies.
- The National Planning Policy Framework⁵ Section 2 requires strategic policies to make sufficient provision for water supplies. Section 14 of the NPPF concerns “Meeting the challenge of climate change, flooding and coastal change” and paragraph 149 make specific reference to water supply within this context. Paragraph 170 goes on to set out that planning policies and decisions should contribute to and enhance the natural and local environment including water. For reference we have included specific government guidance in relation to the optional standard in [Appendix 2](#).
- Local Authorities must “have regard to the River Basin Management Plans and any supplementary plans in exercising their functions” and this includes taking action on water efficiency.
- The production of mains water requires significant energy and chemical inputs and hence reducing demand for water can contribute significantly to reducing carbon emissions, especially where those savings are of hot water.

Why do we need to save water?

The areas covered by Water Resources West are classed as an area under ‘water stress’ by the Environment Agency (Table 1). While local planning authorities are encouraged to draw on this existing evidence to establish the need for possible action government makes clear that this should not be the only consideration⁶ – not least because current maps were not developed to establish areas where additional controls were required on new homes. A requirement for a higher water efficiency standard within a local plan should also follow on from consultation with the local water supplier and the Environment Agency. Additional reasons for the local need for action highlighted by the Environment Agency and the local water suppliers are set out below.

Table 1. Water Stress Classification for current and future scenarios¹ (L=low stress; M=moderate stress; S=serious stress). The four scenarios represent the range of pressures on water resources from climate change and future demands.

Water company area	Current Stress	Future Scenario 1	Future Scenario 2	Future Scenario 3	Future Scenario 4
Dwr Cymru Welsh Water	M	M	M	M	M
Severn Trent	M	M	M	M	M
South Staffs Water	M	M	M	M	M
United Utilities	M	M	M	M	M

⁴ [Section 110 of the Localism Act](#) sets out the ‘Duty to Co-operate’. It requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. Even if the formal duty is removed in future legislation, the August 2020 White Paper³ makes it clear that strategic, cross-boundary issues should still be considered in the context of sustainable development.

⁵ [National Planning Policy Framework](#), Ministry of Housing, Communities & Local Government, February 2019

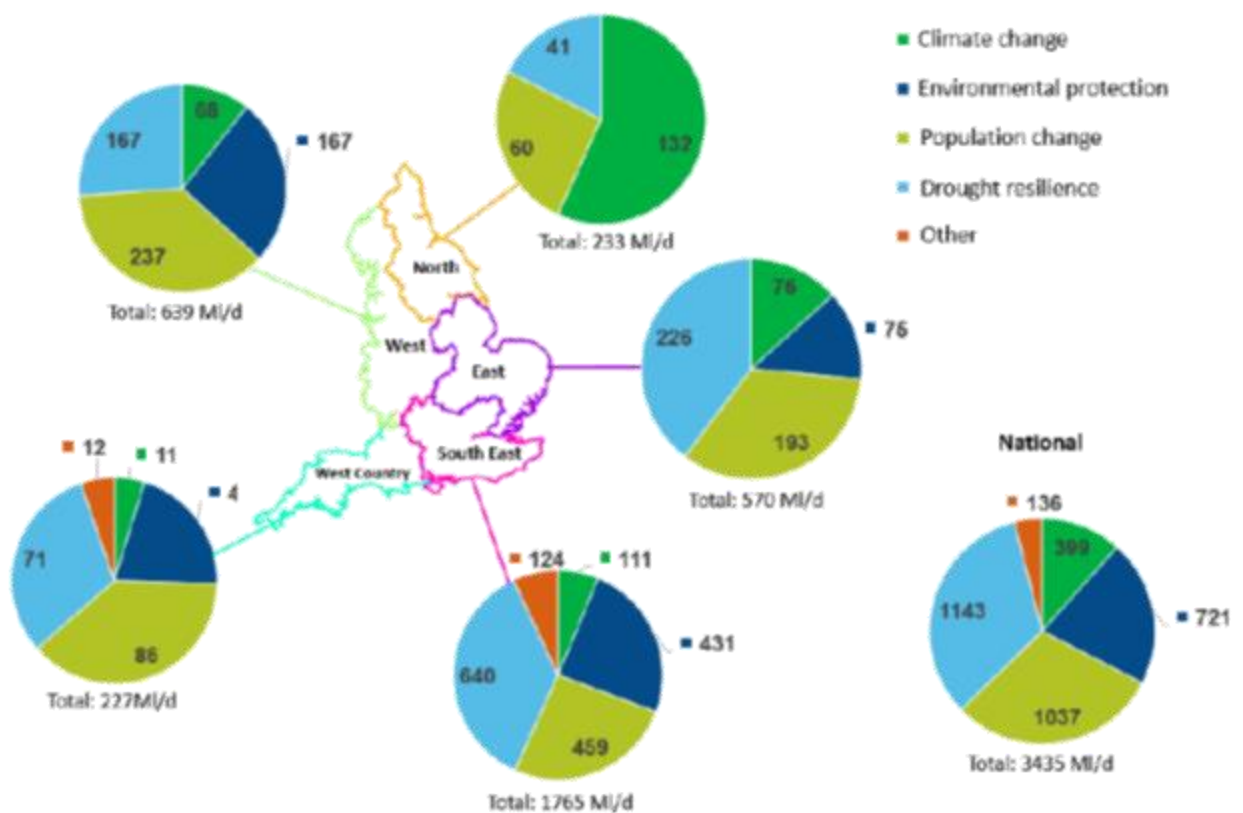
⁶ [Housing Standards Review Consultation](#), Department for Communities and Local Government, August 2013

In March 2020, the Environment Agency published the National Framework for Water Resources⁷. This identifies strategic water needs for England and its regions across all sectors up to and beyond 2050. The National Framework identifies that our region faces the second highest pressures on Water Resources. Significantly, the National Framework identifies that increased consumption, driven by population increases, is the largest driver of additional water need in the region. Increased public water supply drought resilience, increased protection for the environment and the impact of climate change reducing water availability of existing supplies also have impacts on water availability (Figure 1).

Based on the best available evidence the National Framework adopted a planning assumption of reducing average per capita consumption (PCC) to 110 l/p/d by 2050 nationally. Water Resources West’s projections are broadly consistent with that, with average per capita consumption reducing to 111 l/p/d by 2050⁸. These projections are based on forecasts made for the water companies’ 2019 WRMPs.

Even with these reductions in consumption, parts of our region will need new water resources to be developed⁸. If the planned reductions are not achieved then more significant and more costly water resources will need to be developed. It is therefore important the measures are taken across the region to support the achievement of the lower per capita consumption.

Figure 1. Extract from the National Framework⁷ showing how population growth results in Water Resources West having the second highest pressure on water resources in England. Numbers in the pie charts show the additional water needed by 2050 due to different drivers (in MI/d).



⁷ [Meeting our future water needs: a national framework for water resources](#), Environment Agency, March 2020

⁸ [Initial Resource Position](#), Water Resources West, March 2020

Public concern also highlights the need to support water saving. Surveys⁹ of water users in North West England and the Midlands have shown that, while there is little general awareness of the issues, once informed 70% are concerned about water scarcity. In addition to running out of water, customers are worried about the potential impact on water bills, restrictions and wastage

Water Framework Directive requirements are set out in River Basin Management Plans. Water efficiency measures have a direct effect in reducing the abstraction from water bodies assessed in those plans. Abstraction in turn affects the hydrological regime of those water bodies. River Basin Management Plans for the Solway Tweed, North West, Dee, Severn and Humber River Basins identify that there are waterbodies within all those areas for which the hydrological regime does not support good status. In turn the hydrological regime can affect water quality, species and habitats.

Changes to the natural flow and level of water is identified as a significant water management issue. Reduced flow and water levels in rivers and groundwater caused by human activity (such as abstraction) can mean that there is not enough water for people to use and wildlife might not be able to survive. Reduced flow affects the health of fish and exaggerates the impacts of barriers such as weirs.

Table 2. WFD classification of waterbodies in 2015 River Basin Management Plans

River Basin District	Percentage of surface water bodies not achieving good ecological status or potential	Percentage of groundwater bodies not achieved good quantitative status
Solway Tweed ¹⁰	54% (305 out of 560)	28% (18 out of 64)
North West ¹¹	78% (480 out of 613)	11% (2 out of 18)
Humber ¹²	86% (839 out of 987)	25% (13 out of 51)
Severn ¹³	80% (604 out of 755)	21% (9 out of 42)
Dee ¹⁴	73% (68 out of 93)	0% (0 out of 5)

Summary of evidence on the need for the optional water efficiency standard

As we have seen above, there is a range of evidence on the water stress across the North West and the Midlands. This means there is a clear need for the 110 l/p/d water efficiency standard.

For inclusion in a local plan a local planning authority must be able to demonstrate at examination of the plan that the standard is required to address a clear need and as part of an approach to water efficiency that is consistent with a wider approach to water efficiency as set out in the local water undertaker's water resources management plan. We recommend that the following evidence is cited:

- The classification of moderate water stress for the water supplier in your area (Table 1)¹.
- The National Framework for water resources noting that Water Resources West faces the second highest pressures on water resources in England due largely to population growth⁷.
- The National Framework for water resources planning assumption of 110 l/p/d⁷.
- The consistency between these planned reductions in consumption between the National Framework, Water Resources West's plans and your water supplier's WRMP⁸.

⁹ [Customer Survey for Severn Trent, Thames Water and United Utilities](#), Verve, July 2018

¹⁰ [River basin management plan for the Solway Tweed river basin district: 2015 update](#), Environment Agency and Natural Scotland, 21 December 2015

¹¹ [River basin management plan, Part 1: North West river basin district](#), Environment Agency, December 2015

¹² [River basin management plan, Part 1: Humber river basin district](#), Environment Agency, December 2015

¹³ [River basin management plan, Part 1: Severn river basin district](#), Environment Agency, December

¹⁴ [Dee River Basin Management Plan 2015 – 2021, Proposed Summary](#), Natural Resources Wales and Environment Agency, October 2015

- High levels of public concern (70%) in the region, when informed about issues of water scarcity⁹.
- Reference to the WFD ecological status of water bodies in your River Basin District, with changes to flow and level recognised as a significant water management issue in the River Basin Management Plan (Table 2).

Water Companies

A consequence of the population and housing growth in our region has meant that water companies have been asked to accommodate the new growth, yet at the same time their abstraction licenses are being reduced. Therefore it is vital that water companies support and are supported in initiatives to help get 110 l/p/d in planning policies across local authorities in the region, to help meet their requirement to supply their customers. The water companies in Water Resources West are Dwr Cymru Welsh Water, Severn Trent, South Staffs and United Utilities.

In preparing your local plan you should consult with your local water supply company on specific local issues.

New Homes

The scale of new development that is needed across our region is immense - the Government aiming for delivery of 300,000 new homes a year across England¹⁵. Within Water Resources West's region we estimate that there will be 1.6 million new properties by 2050. Yet at the same time there is need to share the already scarce water resources - therefore the need for implementing at least 110 l/p/d into local plans and policies is apparent.

Impact on viability

The cost of installing water-efficient fittings to target a per capita consumption of 110l/d has been estimated as a one-off cost of £9 for a four bedroom house¹⁶. Research undertaken for the Welsh Government indicated potential annual savings on water and energy bills for householders of £24 per year as a result of such water efficiency measures¹⁷.

The Consumer Council for Water notes that the discretionary, tighter (building) standard of 110 l/p/d is something that should be pursued, also bearing in mind that saving water is not the only a driver of water efficiency¹⁸. This is because water efficiency could also have a positive effect on reducing energy bills, water bills of metered customers and carbon emissions.

The Greater London Authority carried out a survey of developers to test the viability of the 110 l/p/d standard. The results of this survey¹⁹ made it clear that those associated with the development industry did not consider that the proposed changes would have any impact on building.

Viability is also evidenced by the examples from other local authorities who have adopted the standard. South Worcestershire adopted the 110 l/p/d standard in its February 2016 local plan. The standard remains the preferred option for next local plan. See the case study below. Bromsgrove and Redditch councils cooperated to require the 110 l/p/d standard for certain developments in their plans which were adopted in January 2017. Another example is Nottingham City Council who adopted the 110 l/p/d standard for all new dwellings in January 2020.

¹⁵ [Planning for the Future](#), Ministry of Housing, Communities and Local Government, March 2020

¹⁶ [Housing Standards Review Cost Impacts](#), Department for Communities and Local Government, September 2014

¹⁷ [Advice on water efficient new homes for England](#), Waterwise, September 2018

¹⁸ [Response to Defra consultation on measures to reduce personal water use](#), Consumer Council for Water, October 2019

¹⁹ [Greater London Authority Housing Standards Review: Evidence Of Need](#), David Lock Associates, May 2015

Water efficiency is therefore not only viable but of positive economic benefit to both private homeowners and tenants.

Water Calculator

The Water Calculator was developed to help provide a working example of the calculator used for part G of the building regulations. It uses the method set out in the ‘Water Efficiency Calculator for New Dwellings’²⁰. The Water Calculator contains information on water consumption for hundreds of products, enabling quick and easy specification, without the hassle of gathering data from several product manufacturers. To access the water calculator visit: www.thewatercalculator.org.uk

Case study

South Worcestershire’s current local plan was adopted, following examination, in February 2016²¹. It is a major sub-regional land use plan, prepared jointly by the three South Worcestershire Councils; Malvern Hills, Worcester City and Wychavon working together. Within the local plan, policy SWDP30c states that “for housing proposals, it must be demonstrated that the daily non-recycled water use per person will not exceed 110 l/p/d”. The reasoned justification for this policy highlights the following factors:

- This policy is central to the council’s response to the Framework, which advocates that local plans incorporate strategies to mitigate and adapt to climate change, in line with the objectives and provisions of the Climate Change Act 2008 over the longer term. This includes factors such as flood risk, water supply and changes to biodiversity.
- Without effective local planning and risk management, the consequences of climate change may also have a significant detrimental impact on budgets and service delivery. It may also compromise the Government’s ability to meet the statutory requirements under the Climate Change Act 2008.
- Local planning authorities have a general responsibility not to compromise the achievement of United Kingdom compliance with the Water Framework Directive (WFD(68)) (Directive 2000/60/EC). More specifically, the local plan has to take into account the River Severn Basin Management Plan, which in itself is a requirement of the WFD. All surface water bodies need to achieve “good ecological status” by 2015.
- The Localism Act 2011 enables the UK government to require local authorities to pay if their inaction results in a failure to meet WFD requirements.
- The Localism Act 2011 also requires local planning authorities to co-operate on strategic cross-boundary matters, for example the provision of water supply infrastructure, water quality, water supply and enhancement of the natural environment. Consequently, there is a need for developers to engage positively with the local water supplier to ensure that all the necessary infrastructure is secured, so as to ensure that there is no deterioration in the quality or quantity of water of the receiving water body(ies) and to avoid delays in the delivery of development.
- The 2006 Natural Environment and Rural Communities (NERC) Act imposes a duty on local planning authorities to have regard to conserving biodiversity in carrying out all of their functions.
- The South Worcestershire Water Cycle Study looks at the level of planned growth and the ability of the infrastructure (i.e. water supply and waste water treatment) to accommodate it without adversely affecting the natural water cycle. It identifies an overall shortage in future water supplies that necessitates the delivery of minimum water efficiency targets.
- The effective management of water is considered critical in the pursuit of sustainable development and communities. It reduces the impact flooding can have on the community, maintains water quality and quantity and helps to enhance local amenity / property value and biodiversity through the provision of Green Infrastructure. Effective water management also reduces the movement of water and sewage, thereby reducing energy requirements. Development proposals incorporating grey

²⁰ Appendix A of [Approved Document G, The Building Regulations 2010](#), HM Government 2015 edition with 2016 amendments

²¹ [South Worcestershire Development Plan, Adopted](#), February 2016.

water recycling will therefore be supported and opportunities for the retrofitting of water efficiency measures will be encouraged.

The South Worcestershire Councils are currently preparing the next local plan. Following consultation its Preferred Options report²² was published in November 2019. In relation to water efficiency the preferred option is to require new dwellings to meet the tighter Building Regulations optional requirement of 110 l/p/d as per the adopted policy.

Recommendations

There is firm evidence in across the North West and the Midlands that clearly justifies the need for more stringent water efficiency targets for new residential development. Local Authorities should consider all the factors in their local plans and we strongly recommend they adopt 110 l/p/d for water efficiency using the suggested wording below:

All new residential development must achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day.

Past experience has shown that successful adoption of 110l/p/d in local plans requires the following:

1. Significant engagement and consultation is required in developing local plans, including engagement with key stakeholders and public sector partners, responsible for delivering a range of services and infrastructure.
2. Recommend local plans are subject to public consultations (many people are concerned about water) and that where appropriate, comments from the public help shape the contents of this plan and helps with public buy-in.
3. Local plans should actively encourage the design of new buildings that minimise the need for energy and water consumption, use renewable energy sources, provide for sustainable drainage, support water re-use and incorporate facilities to recycling of waste and resources.
4. Local plans should have a positive approach to the adaptation of climate change –
 - by avoiding development in areas at greatest risk of flooding, and
 - promoting sustainable drainage, and
 - challenging water efficiency standards.

²²[South Worcestershire Development Plan Review, Preferred Options Consultation](#), November 2019.

Appendix 1. Extract from Part G of the Building Regulations

Extract from Part G of Building Regulations

Optional requirement

2.8 The optional requirement only applies where a condition that the dwelling should meet the optional requirement is imposed as part of the process of granting planning permission. Where it applies, the estimated consumption of wholesome water calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day.

2.9 The person carrying out the work must inform the **BCB** where the optional requirement applies.

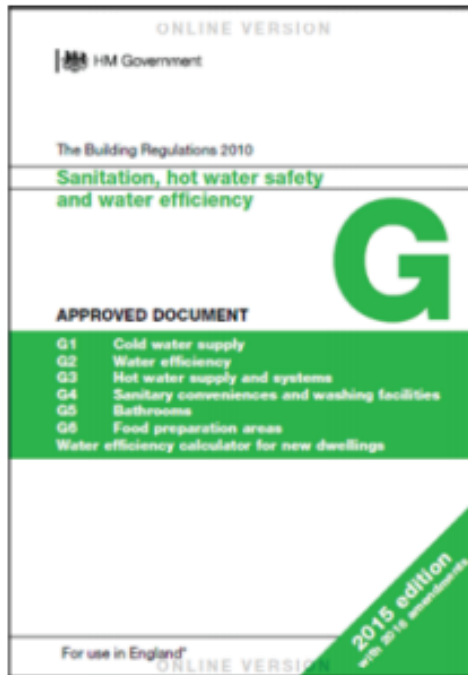
2.10 As an alternative to calculating the water consumption (as paragraph 2.8), a fittings approach that is based on the water efficiency calculator methodology may be used.

2.11 Where the fittings approach is used, the water consumption of the fittings provided must not exceed the values in Table 2.2. If they do, the water efficiency calculator must be completed to demonstrate compliance. Similarly, where a shower is not to be provided or where a waste disposal unit, a water softener or water re-use is to be provided the water efficiency calculator must be completed.

2.12 Where the fittings approach is used, the notice given under regulation 37 should state "Less than 110 litres/person/day using fittings approach".

Table 2.2 Maximum fittings consumption optional requirement level

Water fitting	Maximum consumption
WC	4/2.6 litres dual flush
Shower	8 l/min
Bath	170 litres
Basin taps	5 l/min
Sink taps	6 l/min
Dishwasher	1.25 l/place setting
Washing machine	8.17 l/kilogram



Appendix 2 NPPF Planning Practice Guidance Housing: optional technical standards, Water efficiency standards²³

Can local planning authorities require a tighter water efficiency standard in new dwellings?

In setting out how the planning system should contribute to the achievement of sustainable development, the National Planning Policy Framework and guidance makes clear this includes planning to provide the high quality housing required to meet the needs of present and future generations, and helping to use natural resources prudently. The Framework's policies expect local planning authorities to adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. Early engagement between local planning authorities and water companies can help ensure the necessary water infrastructure is put in place to support new development. See [water supply guidance](#). The local planning authority may also consider whether a tighter water efficiency requirement for new homes is justified to help manage demand.

Paragraph: 013 Reference ID: 56-013-20150327

Revision date: 27 03 2015

What standard should be applied to new homes?

All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). 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 110 litres/person/day.

Paragraph: 014 Reference ID: 56-014-20150327

Revision date: 27 03 2015

How should local planning authorities establish a clear need?

It will be for a local planning authority to establish a clear need based on:

- existing sources of evidence.
- consultations with the local water and sewerage company, the Environment Agency and catchment partnerships. See [paragraph 003 of the water supply guidance](#)
- consideration of the impact on viability and housing supply of such a requirement.

Paragraph: 015 Reference ID: 56-015-20150327

Revision date: 27 03 2015

What are the existing sources of evidence?

Primary sources of evidence which might support a tighter water efficiency standard for new dwellings are:

- The Environment Agency [Water Stressed Areas Classification \(2013\)](#) which identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.
- Water resource management plans produced by water companies.
- [River Basin Management Plans](#) which describe the river basin district and the pressure that the water environment faces. These include information on where water resources are contributing to a water body

²³ <https://www.gov.uk/guidance/housing-optional-technical-standards#water-efficiency-standards>

being classified as ‘at risk’ or ‘probably at risk’ of failing to achieve good ecological status, due to low flows or reduced water availability.

In addition to these primary data sources, locally specific evidence may also be available, for example collaborative ‘water cycle studies’ may have been carried out in areas of high growth.

Paragraph: 016 Reference ID: 56-016-20150327

Revision date: 27 03 2015

Where can I find out more about the water efficiency standard?

See further information on the [water efficiency standard](#).

Paragraph: 017 Reference ID: 56-017-20150327

Revision date: 27 03 2015

Q1. **Name**

Q2. **Address and postcode**

Q3. **Organisation (if applicable)**

Q4. **Email address**

Q5. **Telephone**

Q6. **Agent's Details (if applicable). Please provide Name, Address and Contact details**

Q7. **Do you support the Aldcliffe with Stodday Neighbourhood Plan in meeting the following basic conditions?**

Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make [the plan] Yes

The making of [the plan] is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area) Yes

The making of [the plan] does not breach, and is otherwise compatible with, EU obligations Yes

Prescribed conditions are met in relation to [the plan] and prescribed matters have been complied with in connection with the proposal for [the plan] Yes

Q8. **To help the examiner consider your representation, please specify which part of the plan you are commenting on, using the page number, chapter, paragraph, policy or map. Put your comments below.**

AS 1. Page 20. The fields on both sides of the Lune cyclepath between Freeman's Wood and the car park at the bottom of Aldcliffe Hall Lane are almost green deserts with very little biodiversity interest due to being intensively managed grassland. The land needs to be acquired and managed for biodiversity by the creation of freshwater pools and planted with wildflowers and other plants that provide opportunities for pollinators in spring and summer and seeds for birds in the autumn and winter. Apart from the hedgerows there is very little wildlife interest. By improving this area for wildlife it would provide opportunities for local people and visitors to have quality connections with nature. The whole area covered by the plan needs to be improved for biodiversity and this needs ambitious actions rather than mere cosmetic tinkering. Another factor for improving biodiversity is reducing human disturbance such as dog walkers on the saltmarsh.

Q9. **Please tick the box if you would like to be notified whether the plan proposal is made (adopted) by the Council** Yes

Q10. **Would you like to upload supporting documentation** not answered

Q1. **Name**

Q2. **Address and postcode**

Q3. **Organisation (if applicable)**

Q4. **Email address**

Q5. **Telephone**

Q6. **Agent's Details (if applicable). Please provide
Name, Address and Contact details**

Q7. **Do you support the Aldcliffe with Stodday Neighbourhood Plan in meeting the following basic conditions?**

Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make [the plan] No

The making of [the plan] contributes to the achievement of sustainable development No

The making of [the plan] is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area) No

The making of [the plan] does not breach, and is otherwise compatible with, EU obligations Yes

Prescribed conditions are met in relation to [the plan] and prescribed matters have been complied with in connection with the proposal for [the plan] No

Q8. To help the examiner consider your representation, please specify which part of the plan you are commenting on, using the page number, chapter, paragraph, policy or map. Put your comments below.

I would firstly like to say I have addressed some of my issues directly to the parish council regarding the information in the plan to which I was told they would not discuss the issues with me ? I found this a little strange as I have been a Multiple national award winning property developer for over 25 years . After reading the report I tried to contact the author

(Planning consultant) just to ask why on the new build section or really throughout all the documentation Design codes etc , there was no mention or photos, of the development

The parish council told me in no uncertain terms not to talk to her as they where her client very strange I thought , while doing the report and photos of the area they must of missed them sorry to say I don't think they did . There is a very big demand in the area for larger houses I could of sold these many times over again very strange they where missed. The house shown in the new build section of the report is a property built over 45 years ago which again I found very misleading, then references to other areas of the parish half way through I had to walkout side to check we hadn't be transported to the cotswolds gladly we hadn't. There are so many inaccuracies to this report I really feel the author and parish council should be honest and just admit this report paid for by the public purse is just anti planning document and really a misuse of public funds. My main points to the parish council would be again as they never answered my email are not stated in the report : It doesn't plan for any more housing despite suggesting there is a need . It hasn't looked at where the infill development could go, so shouldn't restrict development to infill as the result could be the need not being met. Best regards

Q9. Please tick the box if you would like to be notified whether the plan proposal is made (adopted) by the Council

Yes

From: Dobson, Gillian <gdobson@lancaster.gov.uk>

Sent: 25 October 2021 09:30

Hi Fiona

Patrick sent me a message via teams, and great point as simplified for the polices map (if NP adopted), see below.

Suggestion for the draft Aldcliffe NP consultation:

<https://keepconnected.lancaster.gov.uk/aldcliffe-with-stodday-neighbourhood-plan-consultation>

Just wondering if the policy numbers could use a different set of letters/prefix, as our Arnside Silverdale AONB DPD uses AS? Maybe AwS? Just to avoid any possible confusion.

Kind regards

Gillian

Gillian Dobson, Consultation & Engagement Officer

Lancaster City Council | Directorate of Economic Growth and Regeneration | Planning & Place Service | Planning and Housing Policy Team | PO Box 4 | Lancaster Town Hall | Dalton Square | Lancaster | LA1 1QR

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