

From: Locke, Liz <liz.locke@environment-agency.gov.uk>
Sent: 05 September 2022 16:18
To: Clark, Fiona Jayne <fjclark@lancaster.gov.uk>
Cc: Leyssens, Andrew <Andrew.Leyssens@uuplc.co.uk>
Subject: RE: Lancaster Local Plan Policy - Policy DM30b Water Efficiency

Dear Fiona,
Please see our supporting statement below:

Further to our statement that we are satisfied that the Climate Emergency Review of the Local Plan Part One and Part Two are both legally compliant and sound, the following comment sets out our specific support for the inclusion of Policy DM30b.

The Policy requires new dwellings to meet the tighter Building Regulations optional 110 litres/person/day standard. We consider this is fully in compliance with para 153 of the National Planning Policy Framework (NPPF) which requires plans to take a proactive approach to take into account the long-term implications of climate change. National Planning Practice Guidance (PPG) then sets out how local authorities should establish a need for this tighter standard, taking into account existing sources of evidence, and in consultation with the local water company and the Environment Agency.

We recognise that the area covered by Lancaster City Council is not within an Environment Agency-identified 'water stressed area', however this is not the only source of evidence that can be used to support the requirement for the tighter water efficiency standard. We agree with the additional evidence clearly set out by Lancaster City Council in their response to questions relating to Policy DM30b. The introduction of the optional standard into local plan policies is supported both in the North West River Basin Management Plan; and in the National Framework for Water Resources. The local authority area falls within the Water Resources West regional group, which has been identified as having the second highest pressure on water resources in the country, due to population growth, future demand for housing, climate change and environmental protection measures.

The Environment Agency considers that the tighter water efficiency standard will help ensure future sustainable water availability across the region, and should therefore be adopted.

Regards,
Liz

Liz Locke
Planning Advisor Sustainable Places, Cumbria and Lancashire.
Environment Agency | Ghyll Mount, Penrith 40 Business Park, Penrith, Cumbria, CA11 9BP

liz.locke@environment-agency.gov.uk