

Greater Norwich Growth Board

Water Efficiency Advice Note – October 2015

1. Purpose of the note

The purpose of this advice note is to support implementation of the water efficiency element of policy 3 of the adopted [Joint Core Strategy](#) (JCS) for Broadland, Norwich and South Norfolk.

It replaces the Greater Norwich Development Partnership Water Efficiency Advice Note produced in 2012.

This advice note takes account of the national housing standards review published in March 2015 through a [ministerial statement](#). Advice concerning non-residential development is unchanged from the 2012 note.

The national housing standards review cancels the Code for Sustainable Homes (CfSH) which JCS policy 3 references. The review establishes new national technical standards for water efficiency in new housing to be implemented through the Building Regulations, including an optional more demanding standard for water efficiency.

The ministerial statement requires that from 1 October 2015, where there is a relevant current Local Plan policy relating to water efficiency, it “**should be interpreted by reference to the nearest equivalent new national technical standard**”. This advice note provides information to enable the government’s revised standards to be implemented through JCS policy 3.

This note also addresses the review’s requirement that local planning authorities review their local information requirements to ensure that the necessary technical detail is requested to support adopted policies.

2. Policy implementation

In relation to water efficiency, JCS policy 3 states:

To ensure all housing is water efficient, new housing development must reach Code for Sustainable Homes level 4 for water on adoption of this document and developments of over 500 dwellings must reach code level 6 by 2015.

All other developments must seek to maximise water efficiency.

The introduction of the national technical standard amends implementation of JCS policy 3 as follows:

1. The Code for Sustainable Homes (CfSH) level 4 policy requirement which applies to most housing development is replaced by the directly equivalent regulation 36 2(b) higher national technical standard for water efficiency, both of which are set at 110 litres per person per day (l/p/d) as opposed to the standard Building Regulations requirement of 125 l/p/d. This level of water efficiency can be easily achieved at very little extra cost through the use of water efficient fixtures and fittings.
2. The adopted JCS policy 3 requirement for developments of over 500 dwellings to be built to the former CfSH level 6 standard of 80 l/p/d by 2015, which encouraged a design led approach to water efficiency on large scale sites, can no longer be applied due to the national policy changes.

The justification for this policy approach is set out in the JCS and in appendix 3.

2.1 Residential developments

The regulation 36 2(b) optional higher requirement of 110 litres/person/day water efficiency is set out in [part G2 of the 2015 Building Regulations](#) . When completing their Building Regulations assessments, the applicant for planning permission must use the water efficiency calculator in part G2 [appendix A](#) to show how the development meets the requirement. This requirement will be set out in planning permissions and planning conditions will be applied (see appendix 1).

2.2 Non-residential development

The policy also requires non-residential development to **maximise** water efficiency. Evidence of how this will be done should be included in a Design and Access Statement. As a result, non-housing development should be accompanied by a nationally recognised assessment of water consumption.

It is strongly recommended that the most practical way of doing this is through a BREEAM assessment. Further detail on BREEAM assessments is in appendix 2 and the BREEAM [website](#) (see section 8).

In the absence of a BREEAM assessment, developers will need to provide evidence in their Design and Access Statement of how they have **maximised** water efficiency, clearly setting out the alternative means of achieving water efficiency that are appropriate to their development.

In most cases where significant building work is being undertaken, it is expected that water reuse techniques will be incorporated. If this is not proposed, the reasons for not doing so should be set out in the Design and Access statement.

3. Planning applications

Since the policy requirement is tied to national standards in the Building Regulations and BREEAM, the process for providing the necessary information to support a planning application is relatively straightforward.

3.1 Pre application discussions

Water efficiency will be one of the policy requirements to be discussed by development management planners and developers from the earliest stages of the design and planning application process. Early consideration will reduce associated costs.

3.2 Submitting planning applications

Residential development: Reference to the requirement for the housing development to comply with the regulation 36 2(b) for water efficiency, and how this will be addressed, should be incorporated in the Design and Access Statement which supports the planning application.

Non residential development: The Design and Access Statement must include **either:**

- the **BREEAM design stage water assessment** (see appendix 2 for further detail). Commentary with the assessments should show how the development has maximised water efficiency, achieving as close to the “exemplary” standard as possible. This should be clearly set out in the Design and Access Statement. Due to economies of scale, large scale developments in particular should be able to achieve the highest standards.
- **or;** an assessment, covering both water consuming components and greywater or rainwater systems, showing how water efficiency has been **maximised**. Clear reasons must given in the Design and Access Statement stating why the submitted approach has been favoured.

3.3 Assessing planning applications

For all residential development, regulation 36 2(b) for water efficiency of the Building Regulations will be applied.

For non-residential development, the content of the Design and Access statement in relation to water efficiency (including any submitted accredited BREEAM assessment) will be assessed.

3.4 Conditions

Standard water conditions will be applied to relevant planning permissions. These are to ensure that the appropriate levels for water efficiency have been achieved and where applicable, will require that a BREEAM assessment is made on completion of development, prior to occupation. The standard conditions are in appendix 1.

3.5 Long term maintenance

It will be important that developers inform residents and other users of their developments of both the advantages of the installed water efficiency devices and systems and of any issues related to long term maintenance.

Appendix 1 Standard water conditions

1) For housing

The development hereby approved shall be designed and built to meet the regulation 36 2(b) requirement of 110 litres/person/day water efficiency set out in part G2 of the 2015 Building Regulations for water usage. No occupation of [any of] the dwelling[s] shall take place until a Building Regulations assessment confirms that the development has been constructed in accordance with regulation 36 2(b) of part G2 of the Building Regulations for water efficiency and has been submitted to and agreed in writing by the local planning authority.

REASON: To ensure the development is constructed to an appropriate standard in accordance with Policy 3 and 20 of the adopted Joint Core Strategy 2011

2) For non-residential schemes

2.1 Including a BREEAM assessment:

No occupation of [any of] the development shall take place until an accredited Post Construction stage BREEAM assessment which confirms that the development has been constructed in accordance with the BREEAM score for water usage required in the planning permission has been submitted to and agreed in writing by the local planning authority.

REASON: To ensure the development is constructed to an appropriate standard in accordance with Policy 3 and 20 of the adopted Joint Core Strategy 2011

2.2 Not including a BREEAM assessment

No development shall take place until details of water conservation measures designed to maximise water conservation have been submitted to and agreed in writing by the local planning authority. No use of the development hereby approved shall take place until the agreed measures have been installed and brought into use and such measures shall be permanently retained.

REASON: To ensure the development is constructed to an appropriate standard in accordance with Policy 3 and 20 of the adopted Joint Core Strategy 2011

3) Mixed use schemes require both

Appendix 2 BREEAM Assessments for non- domestic buildings

As part of a BREEAM assessment, a score (ranging from 1 to 5, with a higher “exemplary” score) is given for water efficiency using the BREEAM Wat 01 water consumption calculator. The water consumption (litres/person/day) for the assessed building is compared against a notional baseline performance and BREEAM credits awarded as follows:

% improvement	No. of BREEAM credits
12.5%	1
25%	2
40%	3
50%	4
55%	5
65%	Exemplary performance

When submitting applications for non domestic buildings, developers using BREEAM assessments will need to supply Design Stage BREEAM assessments as part of their Design and Access Statements. These must contain the following:

1. Completed copy of the BREEAM Wat 01 calculator
2. Relevant section/clauses of the building specification/ design drawings confirming technical details of;
 - Sanitary components
 - Rainwater and greywater collection system

OR where detailed documentary evidence is not available at this stage;

1. Completed BREEAM Wat 01 calculator
2. A letter of instruction to a contractor/supplier or a formal letter from the developer giving a specific undertaking, providing sufficient information to allow the water calculations to be completed.

Appendix 3 The need for water efficient development in the area

Since water resource and quality issues do not affect all parts of the country equally, there is no national approach to increase water efficiency in development beyond the standard building regulations requirements of new dwellings being built to use no more than 125 litres of water per person per day.

Higher standards can be required where a local plan policy is in place which has been subject to independent examination showing the need for such a policy approach.

The greater Norwich area experiences low rainfall and suffers from water stress. A detailed Water Cycle Study was undertaken as part of the evidence base for the Joint Core Strategy (JCS). This showed that the housing and economic growth needs of the area required water efficient new development. This is mainly due to the need to address water quality issues in internationally protected habitats in the Broads and the Wensum. Therefore a progressive water efficiency policy, which received broad support at examination, was introduced through the JCS. The updated approach set out in this advice note maintains an emphasis on the need for water efficiency in new development in the area, though the most demanding requirements for very large housing sites can no longer be implemented.

In addition to emphasising the need for new development to be water efficient, Anglian Water is working to increase the water efficiency of existing development. This is being done primarily through increased metering, as promoted by the [Water Resources Management Plan 2014](#) and related water efficiency [campaigns](#).