North Yorkshire Council's Response to Inspector's Matters, Issues and Questions

Matter 3 – Energy, Climate Change and Flooding

Issue 1 – Net Zero Carbon, Embodied Carbon, and the Circular Economy – Policies NS4, NS5, NS7 and NS8

Q1. Policy NS5 requires a car parking ratio of 1 space per home or less (unless a clear car parking strategy can be demonstrated). Is this approach reasonable and justified?

NS5 requires a car parking ratio of 1 space per home unless a parking reduction strategy can demonstrate how the target will be achieved (if not achievable at first occupation). It explains that the strategy may include higher levels of provision to avoid parking littering- where drivers leave cars anywhere possible without consideration of other highway, footway or open space users- but these should be largely unallocated where the space can be reallocated to other uses over time in line with monitoring. In response to comments received at Reg 19 consultation, a modification is proposed to NS5 (M/CC/5), along with a consequential modification to the supporting text (M/CC/12), to ensure the approach is justified and effective by clarifying the approach and ensuring that where target levels cannot be shown to be adequate additional parking is provided off-plot in-line with standards in local plan policy TI3 and that the additional off-plot parking should only be reallocated to other uses where shown to be no longer required.

Section 2.1 of the New Settlement Climate Change Strategy (CCS) (SDNS08) highlights several societal drivers suggesting that the community at Maltkiln will own fewer cars and drive fewer private car miles than might be the case today. It points to data showing that many of the largest cohort of current drivers (those currently in their late 50s) will be driving less, as well as data showing fewer young people learning to drive and more people reporting no interest in driving, highlighting that this will create a need for alternative transport solutions for some sections of the population that, if appropriately met, could help the development meet net zero carbon travel ambitions. The CCS identifies support for ride sharing, car clubs, bike share schemes, use of e-scooters as well as public transport provision and high-quality walking and cycling routes as measures to help reduce the reliance on private car ownership and use.

Measures to support these alternatives and reduce reliance on private car use are required through NS5 and Access and Movement policies in the DPD. As highlighted in the CCS, supporting alternatives to the car will be fundamental to achieving the net zero carbon travel ambition at Maltkiln because enabling the transition to electric vehicles (EVs) alone will not be sufficient to eliminate transport emissions by 2038.

The approach to residential car parking seeks to ensure that parking needs will be met through the application of existing parking standards whilst avoiding locking the development into residential plot designs driven by accommodating all parking on-plot when the approach of the DPD as a whole is aimed at reducing the need for private car use, which if successful would result in less need for car parking. Reducing the importance of on-plot parking in the design process will also allow other urban design objectives, such as provision of private amenity space and street surveillance, to come to the fore and play a bigger role in influencing the design of plots and neighbourhoods.

The approach recognises that it may take time to secure modal shift and reduce parking needs by ensuring that off-plot parking would only be re-allocated to other uses where it is shown to no longer be required. As such, the approach to residential parking, as amended through M/CC/5, is considered reasonable and justified.

Q2. How will Policy NS7 contribute to the objective of the DPD to use improving best practice to reduce embodied carbon throughout the whole life-cycle of development? How does the identified infrastructure project for new supply connections to the existing gas network at Flaxby as set out in the table at section 11 of the DPD relate to this?

Measures to reduce embodied carbon emissions throughout the whole life-cycle of development are set out in policy NS8. The policy requires proposals to be supported by a settlement-wide embodied carbon, circular economy and life-cycle emissions strategy that demonstrates actions to reduce these emissions. The policy requires subsequent detailed proposals to respond to relevant elements of the approved settlement-wide strategy.

In recognition that this is an evolving area of practice where new products, supply chains and methods of working that could contribute to reducing embodied emissions are developing rapidly, and that detailed proposals may come forward several years after approval of the settlement-wide strategy, the policy includes a mechanism to ensure that improving best practice informs detailed proposals in order to secure further reductions in emissions where possible. This requires strategies supporting detailed proposals to review relevant aspects of the settlement-wide strategy against latest best practice in order to update approaches where this would deliver greater carbon savings. Detailed proposals are then required to demonstrate their supporting strategy will be delivered.

As highlighted in response to comments received during the Reg 19 consultation relating to both policy NS7 and section 11 of the DPD, set out in the Consultation Statement (CDNS06), the identified infrastructure project of new supply connections to the existing gas network at Flaxby

(set out in the table at section 11) has been carried forward from earlier work prior to the preparation of the New Settlement Climate Change Strategy (SDNS08) in error and does not reflect the approach of policies in the DPD. A modification (M/DP/3) is, therefore, proposed to remove this row from the table. Policy relating to the heating of buildings is set out in NS7, which requires a settlement-wide net zero carbon energy strategy that demonstrates the integration of heat, power and transport and emission reductions in-line with the 2038 net zero target. As set out at paragraph 5.40 of the supporting text, the introduction of the Future Homes and Future Buildings Standards, expected in 2025, will prevent the use of gas boilers in new buildings and, as such, policy NS7 has been prepared on the basis that electricity will power heating systems. In response to comments received at Reg 19 a modification (M/CC/34) is proposed to the supporting text to improve effectiveness that highlights known barriers to the installation of gas, uncertainty around decarbonising gas systems in the timescales required by policy NS4 and concludes that there should be a presumption against the use of gas at Maltkiln.

Q3. Part 4 of the energy hierarchy set out in Policy NS7 requires that the settlement-wide net zero carbon energy strategy demonstrates that systems can be integrated with telecoms and electric vehicle infrastructure to minimise peak energy demand. Is this requirement reasonable and justified? How would this be achieved?

It is considered that the requirement for the net zero carbon energy strategy to demonstrate that systems can be integrated with telecoms and electric vehicle (EV) infrastructure is reasonable and justified. The New Settlement Climate Change Strategy (CCS) (SDNS08) identifies that to meet the 2038 net zero carbon ambition, heating and energy systems and increasingly transport provision at Maltkiln will need to be powered by electricity and that this will result in high energy demand, particularly at peak times, which is likely to be challenging, both technically and financially, for developers to meet from grid connections given the known grid constraints locally.

Encouraging reductions in peak demand through flexible tariffs is already happening, however, to maxmise the benefits of power users managing their use of grid electricity, both in terms of reducing peak demand but also securing lower bills, requires the integration of energy systems using internet connectivity. For example, property-by-property and development-wide energy systems increasingly talk to each other and to the grid, with suppliers such as Octopus Energy allowing second-by-second trading.

Delivery of Maltkiln will be take place over the long-term, going well beyond the current Local Plan plan period, which looks to 2035. Section 2.1.2 of the CCS shows that the majority of vehicles nationally are expected to be EVs by the 2030s and that the Local Plan area already has significantly higher levels of EV registrations than the national average. This will place increasing demands on the grid that are already beginning to be managed through smart tariffs. However, integration between energy systems and EV infrastructure using internet connectivity also allows users to power homes using EV batteries allowing further reductions in peak demand and bill savings as well as helping to ensure energy demands can be met.

Applicants are required to demonstrate that energy systems can be integrated with telecoms and EV infrastructure but are not expected to provide the integration themselves. The role of applicants is to meet the requirements of policy NS6 by ensuring the availability of high-capacity broadband systems and adequately supporting any necessary increases in the capacity of existing 5G mobile technology so that the telecoms infrastructure will be available for use by others, such as, grid operators, electricity suppliers and the occupiers of buildings. In response to comments received during the Reg 19 consultation, a modification (M/CC/36) is proposed in order to provide additional guidance in the supporting text to improve effectiveness.

Q4. Part 5 of the energy hierarchy set out in Policy NS7 requires applicants to implement recognised quality and monitoring regimes in relation to energy performance of dwellings and buildings and report the results. Is the policy sufficiently clear as to how this would be implemented?

Paragraph 2 bullet 5 of policy NS7 requires applicants to implement a recognised quality regime that ensures the 'as built' performance of dwellings and buildings achieves the designed performance in order to reduce the 'performance gap'. The policy identifies that consideration will focus on performance in relation to energy use, carbon emissions, indoor air quality, and overheating risk. Performance gap issues and implementation of a quality regime are discussed in the NS7 supporting text from paragraph 5.52. Paragraph 5.53 identifies the 'soft landings' approach set out in the Soft Landings Framework (BG 54/2018) produced by the Building Services Research and Information Association (BSRIA) as a suitable quality regime.

'Soft landings' is a building delivery process that runs throughout a project, from inception to completion and beyond, to ensure all decisions made during the project are based on improving operational performance of the building and meeting the expectations of end users. Soft landings is an open-source methodology, however, BSRIA provide a range of services to aid its implementation. Further information on 'soft landings' is available from BSRIA (web address below). It is considered that the policy is clear how the need for use of a quality regime would be implemented.

Paragraph 2 bullet 5 of policy NS7 also requires applicants to implement a recognised monitoring regime focussing on performance in relation to energy use, carbon emissions, indoor air quality and overheating risk, and to publish the results. The policy sets out the proportion of dwellings/buildings to be assessed and the frequency of assessments. Performance gap issues and implementation of a monitoring regime are discussed in the NS7 supporting text from paragraph 5.52. Paragraph 5.54 provides further information on monitoring. It explains that information recovered will be provided to applicable owners and the planning authority and be used by developers to inform the design and construction of later properties in order to reduce any performance gap issues identified.

The Council consider that the monitoring and reporting of 'as built' performance is an important tool to address widely recognised performance gap issues. However, the Council also acknowledges that the policy may not be sufficiently clear as to how this would be implemented.

If the Inspector agrees, the Council suggests that monitoring requirements are further developed in consultation with relevant developers and other relevant stakeholders and in-light of any similar approaches recently adopted as planning policy, where identified, so that an acceptable modification can be proposed.

BSRIA Soft landings: https://www.bsria.com/uk/consultancy/project-improvement/soft-landings/?srsltid=AfmBOooHPuep4BWvmdr4X9sWANMUQ4rJHe02TTiL2AjWV2FsRXw1QpPh

Q5. Is it sufficiently clear what Policies NS4, NS5, NS7 and NS8 require from decision-makers and developers? Have the requirements been adequately tested to ensure that they are viable and deliverable?

Subject to modifications as proposed, it is considered sufficiently clear what Policies NS4, NS5, NS7 and NS8 require from decision-makers and developers.

NS4 sets the overarching DPD requirement in relation to reducing carbon emissions, which is to support delivery of net zero carbon by 2038. It requires all development phases to contribute to achieving the target date and identifies the sources of emissions being targeted. It explains that compliance with the policy will be assessed by consideration of a series of detailed strategies required to accord with subsequent climate change policies. The policies requiring strategies most relevant to achieving net zero carbon are NS5, NS6, NS7, NS8 and NS9. Each subsequent policy sets detailed requirements for an individual strategy.

NS5 requires the preparation of a net zero carbon movement strategy demonstrating that Maltkiln will include measures necessary to achieve net zero carbon movement and enable net zero carbon movement from first occupation. The policy then sets out elements that the strategy needs to contain. The policy also includes requirements to ensure that Maltkiln is designed in-line with the strategy and delivery of its elements takes place.

NS7 requires the preparation of a settlement-wide net zero carbon energy strategy demonstrating an integrated approach to meeting energy needs from heat, power and transport. The strategy is required to demonstrate emissions reductions in-line with the 2038 net zero target based on reasonable projections of energy demand. The policy then sets out elements that the strategy needs to contain as well as elements that need to be considered for inclusion. The policy also includes requirements to ensure that Maltkiln is designed in-line with the strategy and delivery of its elements takes place.

NS8 requires the preparation of a settlement-wide embodied carbon, circular economy and life-cycle emission strategy demonstrating actions taken to reduce embodied carbon throughout the life-cycle and actions taken to maximise opportunities for re-use and development of circular economies. The policy then sets out elements that detailed requirements. The policy also includes requirements to ensure that Maltkiln is designed and delivered in-line with the strategy unless alternative approaches demonstrating greater carbon savings are proposed. This

includes a requirement for a site-wide emissions audit and a whole life-cycle emissions assessment.

Viable and deliverable

The New Settlement Viability Note (SDNS04) considered the costs of moving towards zero carbon. This is updated and expanded on in the Council's response to Matter 9.

Q6. What is the justification for the suggested changes to Policies NS4, NS5, NS7 and NS8 and their respective supporting text? Why are they necessary for soundness?

NS4: A modification (M/CC/1) is proposed to NS4 to improve effectiveness by clarifying that the requirements of the policy must be met.

NS5: Modifications are proposed to NS5. M/CC/5 (and a consequential change to the supporting text- M/CC/12) are discussed in response to Q1. M/CC/3 (and a consequential change to the supporting text- M/CC/10) updates requirements to reflect evidence of what is deliverable. M/CC/7 (and a consequential change to the supporting text- M/CC/13) would improve effectiveness by allowing greater flexibility in acceptable approaches. M/CC/2 M/CC/6 and M/CC/8 give greater clarity that the requirements of the policy must be met. In addition, several modifications not considered necessary for soundness are proposed: M/CC/4 (and a consequential change to the supporting text- M/CC/11) changes wording to reflect up-to-date terminology and highlight the link with NS30, and M/CC/9 clarifies relevant strategies.

NS7: A series of modifications are proposed to NS7 to improve the clarity of requirements and guidance. M/CC/34 and M/CC/36 add clarity to guidance in the supporting text and are discussed in response to Q2 and Q3 respectively. M/CC/22 and M/CC/23 and consequential supporting text changes (M/CC/28 and M/CC/30 respectively) clarify that the requirements of the policy must be met. M/CC/24 and a consequential change to the supporting text (M/CC/34) clarifies the approach towards Allerton Waste Recovery Park to improve effectiveness and ensure compliance with NPPF para 155. M/CC/25 and supporting text changes (M/CC/32) clarifies that the requirement relates to the built fabric and needs to be met. M/CC/29 regarding Local Area Energy Plans, M/CC/31 (passive house costs), and M/CC/38 (affordability) add clarity to the supporting text in order to improve effectiveness. In addition, several modifications not considered necessary for soundness are proposed: M/CC/26 and a consequential change to the supporting text (M/CC/33) highlights that an existing Local Plan policy CC4 continues to apply. M/CC/27 makes a grammatical correction to the policy, while M/CC/35 and M/CC/39 make grammatical corrections to the supporting text and M/CC/37 highlights a relevant policy in the DPD.

NS8: Modifications (M/CC/40; M/CC/42) are proposed to NS8 to give greater clarity that the requirements of the policy must be met. A further modification (M/CC/41), along with consequential changes to the supporting text (M/CC/43), requiring applicants to set out actions taken to maximise use of bio-based construction materials, where appropriate, is proposed to

improve effectiveness, reflecting the fact that use of these materials is one of the most effective ways of meeting the requirements to reduce embodied emissions and support circular economies, but that use may not always be appropriate. Finally additional guidance in the supporting text on circular economies is proposed through M/CC/44 in order to improve effectiveness.

Issue 2 – Smart, Inclusive and Flexible Living & Working – Policies NS6 and NS9

Q1. Is the requirement set out in Policy NS6 for very high capacity (at least 1Gbps) fibre broadband systems to be made available to all buildings from first occupation appropriate and justified?

Paragraph 118 of the NPPF requires policies to support the expansion of electronic communications networks, including broadband, prioritising full fibre connections and setting out how high-quality infrastructure is expected to be delivered and upgraded over time. The New Settlement Climate Change Strategy (SDNS08) demonstrates an interrelationship between energy systems, transport provision and use, and flexible working in securing carbon reductions, and highlights how high quality, always available telecoms with high download and upload capacities are required to enable energy and transport systems and flexible working to maximise carbon reductions. As such telecoms will be an essential piece of climate change infrastructure at the new settlement.

Local Plan (SDNS14) policy TI5 already requires new housing and employment development to enable fibre to the premises (FTTP), subject to viability. Provision of FTTP would deliver the minimum 1Gbps required by NS6. As highlighted in response to comments during the Reg 19 consultation, set out in the Consultation Statement (CDNS06), delivery of these speeds is becoming the industry norm. Research for Think Broadband (Jan 2023) identifies that in 2022 the proportion of new properties with a 1Gbps speed was over 99% and FTTP over 98%. For several years Part R of the Building Regulations has required new buildings to contain the in-building physical infrastructure necessary to allow installation of broadband and in December 2022 the requirements applied to new dwellings were strengthened, with new homes required to provide minimum 1Gbps connections. It is also understood that Openreach will now deliver full fibre on new developments of 19 or more homes at no cost to the developer. As such, the NS6 requirement for very high capacity (at least 1Gbps) fibre broadband systems to be made available to all buildings from first occupation is considered appropriate and justified.

In response to comments received during the Reg 19 consultation, set out in the Consultation Statement (CDNS06), a modification (M/CC/15) is proposed to ensure the policy is justified and effective. The change would limit the need for infrastructure to support future upgrades to 10Gbps speeds, rather than 100Gbps, as these increased speeds can be achieved using the initial infrastructure whereas increases beyond this are likely to require future retrofit with new technical solutions. To enable such upgrades the modification includes a requirement for systems to be built in a way that supports this future work. A further modification (M/CC/17) is

proposed requiring the infrastructure to support multiple internet service providers, as required by paragraph 118 of NPPF. Consequential modifications to support these changes are proposed through M/CC/19. These changes will ensure the approach is deliverable and fully aligns with the NPPF.

Q2. Policy NS6 also requires that site-wide 5G connectivity or greater be available from first occupation across all neighbourhoods. Is this a reasonable and justified approach?

Paragraph 118 of the NPPF requires policies to support the expansion of electronic communications networks, including broadband, prioritising full fibre connections and setting out how high-quality infrastructure is expected to be delivered and upgraded over time. The New Settlement Climate Change Strategy (SDNS08) demonstrates an interrelationship between energy systems, transport provision and use, and flexible working in securing carbon reductions, and highlights how high quality, always available telecoms with high download and upload capacities are required to enable energy and transport systems and flexible working to maximise carbon reductions. In addition, the NS6 accompanying text (paragraphs 5.30 to 5.35) provides further detail on the application of telecoms and their importance in addressing each of the four climate change priority areas for action identified in the Climate Change Strategy. As such telecoms will be an essential piece of climate change infrastructure at the new settlement.

However, in response to comments received at Regulation 19, it is recognised that ensuring availability of 5G (or greater) connectivity in-line with the requirements of NS6 would be dependent on the actions of third parties outside of an applicant's control. As such, modifications are proposed to the policy (M/CC/16) and supporting text (M/CC/20) that would remove the requirement to demonstrate that 5G (or greater) connectivity will be available from first occupation across all neighbourhoods. However, in recognition of the importance of the availability of next generation mobile technology (such as 5G) and the crucial enabling role available to applicants to support the expansion of these networks, this would be replaced by a requirement for applicants to demonstrate how 5G (or greater) connectivity will be delivered across all neighbourhoods, which includes actions applicants will take to increase the likelihood that capacity increases in tandem with increased demand as a result of the development, such as accommodating any land use implications.

It is considered that, following modification, the NS6 approach to supporting mobile technology (such as 5G) is reasonable and justified.

Q3. Is the requirement set out in Policy NS9 for proposals to be accompanied by a settlement-wide flexible living and working strategy appropriate and justified?

Local Plan (SDNS14) policy DM4 requires the DPD to ensure that the new settlement will be an exemplar of sustainable design and resource efficiency. In responding to this, the DPD recognises that delivering Maltkiln will be a long-term undertaking stretching beyond the 2038 date that the Council's Carbon Reduction Strategy (ODCC02) targets for achieving a net zero carbon economy, and therefore, it seeks to support this ambition by reducing carbon emissions

as much as possible. Section 2.1.3 of the New Settlement Climate Change Strategy (CCS) (SDNS08) identifies that supporting the transition to electric vehicles (EVs) will not be sufficient to eliminate transport emissions by 2038 and, therefore, further measures such as encouraging modal shift and trip substitution will be necessary to achieve carbon reduction.

A flexible living and working strategy is required so that Maltkiln can fully capitalise on the societal trends of increased home and hybrid (home and office) working to achieve trip substitution by encouraging more people to work within the settlement rather than commuting to an employer's premises off-site. Section 2.3 of the CCS identifies that the way significant sections of society undertake work has been changing for years with hybrid working patterns becoming the norm for many post pandemic. It also highlights ONS data showing that over a quarter of Yorkshire and Humber residents report home as their main work location, as well as data showing that the sectoral make-up of local economy makes the Local Plan area more conducive to home working than the national average, which suggests that supporting flexible working at Maltkiln could be particularly effective at reducing carbon emissions and energy demand associated with commuting.

Supporting flexible working to maximise carbon reductions will have implications for how space in homes is used. The CCS highlights data showing that a quarter of home workers have a dedicated space while 60% use makeshift spaces. Therefore, it may be appropriate to provide dedicated spaces in some homes. However, in recognition that this cannot always be achieved it will also be necessary to provide flexible co-working spaces to response to likely demand. The requirement for a settlement-wide strategy ensures that an appropriate mix of support can be considered in the round.

Successfully supporting flexible working will also provide wider benefits to the community by ensuring greater levels of daytime activity providing increased footfall to support the viability of shops, cafes and services in the local centre. While local centre provision is required through NS27, to attract residents seeking to live in places conducive to flexible working, it will be necessary to ensure that consideration is given to ensuring adequate minimum local centre provision reflecting likely demand is available from the earliest phases and to ensure the ability of provision to expand as Maltkiln grows. It is therefore considered that the requirement for a settlement-wide flexible living and working strategy is appropriate and justified.

Q4. Policy NS9 also requires that as a minimum all homes will meet the Nationally Described Space Standards. Is this approach justified and does it provide sufficient flexibility?

As set out at paragraph 5.73 of the DPD, the NS9 requirement for all new homes at Maltkiln to meet as a minimum the Nationally Described Space Standards (NDSSs) carries forward an existing Local Plan (SDNS14) requirement set out in policy HS5 for all new housing across the Local Plan area to meet this standard. The NDSSs set what the government considers to be the minimum reasonable internal space required to undertake typical day-to-day activities at given levels of occupancy.

NPPF paragraph 135 bullet f requires policies to ensure that development creates places with a high standard of amenity for users; and footnote 52 continues, highlighting that policies may make use of the NDSS where the need for an internal space standard can be justified. The need for an internal space standard across the Local Plan area was justified as part of the preparation of the Local Plan. Paragraph 5.41 of the Local Plan identifies that a review of the size and type of dwellings being built in the area prior to Local Plan adoption indicated that smaller market and most affordable properties usually failed to meet the relevant NDSS.

NS9 requires proposals to support residents to work within Maltkiln remotely from their employer's premises through the preparation and delivery of a flexible living and working strategy. Many remote workers choose to work within the home, however, this places additional pressure on internal space. In this context and given that proposals are required to support remote working, it is not considered appropriate to allow greater flexibility in meeting the minimum requirements of the NDSS at Maltkiln than elsewhere in the Local Plan area as this is likely to result in less internal space for a given level of occupancy and make home working more difficult to accommodate.

The provision of dedicated home office spaces is supported; however, it is recognised that this cannot always be achieved and where such space is provided, developers are unable to control how the space is used by occupiers. Where the provision of home office space could lead to a higher level of occupancy, for example through use of the space as an additional bedroom, space standards will ensure that adequate internal space is provided.

Use of space standards will also help ensure that the housing mix meets local needs. Policy NS22 requires proposals to deliver a range of house types, tenures and sizes reflecting policies in the Local Plan. Local Plan policy HS2 requires the mix to reflect findings in the Housing and Economic Development Needs Assessment (HEDNA) (ODHS01), summarised at paragraph 5.4 as a need to focus delivery on two and three-bedroom homes. Application of the NDSSs will be important in assessing schemes to understand whether or not any proposed home office space within one, two or three bedroomed properties could constitute an additional bedroom, potentially distorting delivery away from an acceptable mix.

Q5. What is the justification for the suggested changes to Policies NS6 and NS9 and relevant supporting text? Why are they necessary for soundness?

Following the Reg 19 consultation several modifications are proposed to NS6. M/CC/15 and M/CC/17, relating to broadband requirements, are discussed in response to Q1, and M/CC/16, relating to mobile technology, is discussed in response to Q2. M/CC/14 is proposed in order to give greater clarity that the requirements of the policy must be met. In addition, a minor modification M/CC/18, not considered necessary for soundness is proposed in order to highlight to applicants and decision makers that further existing requirements of Local Plan policy TI5 continue to apply.

Following the Reg 19 consultation, three modifications are proposed to NS9 (M/CC/45, M/CC/46, M/CC47). These are proposed in order to give greater clarity that the requirements of the policy must be met.

Issue 3 – Climate Resilience, Flood Risk and Drainage – Policies NS10 and NS11

Q1. Is the requirement set out in Policy NS10 for proposals to be accompanied by a settlement-wide climate resilience strategy appropriate and justified?

The requirement for proposals to be accompanied by a settlement-wide climate resilience strategy is considered appropriate and justified. Paragraph 158 of the NPPF requires plans to take a proactive approach to adapting to climate change in-line with the Climate Change Act 2008, taking account of factors including the long-term implications for flood risk, water supply, biodiversity and landscapes and the risk of overheating. It states that policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, while paragraph 159 requires new development to be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change.

The New Settlement Climate Change Strategy (CCS) (SDNS08) identifies climate resilience as one of four climate change priority areas to be addressed in the DPD, highlighting, at section 2.4, the government's 2022 UK Climate Change Risk Assessment (UK CCRA) which warns that although the aim is to limit warming to 1.5^{o}C, we should be prepared for higher levels of up to 4^{o}C. The assessment explains that current international commitments (COP26) are likely to result in warming of at least 2^{o}C but that even under this lower warming scenario 'high' and 'very high' risks relating to health from heat (both in the environment and within buildings), to property and infrastructure from heat and flooding (including power failure), to homes and businesses from water availability and to ecosystems from water quality can be expected. However, it also highlights that many low cost 'low regret' actions can be taken to improve resilience that will help to avoid costly remedial actions in the future. The CCS identifies the main climate risks at Maltkiln as increased flood risk, exposure to heat and water supply constraints but highlights that delivery of a new settlement also presents opportunities to consider resilience and adaptation measures at a settlement-wide scale through masterplanning.

The requirement for proposals to be accompanied by a settlement-wide climate resilience strategy seeks to ensure that planning for climate resilience is evidence based, considered from the outset and integral to the both the masterplannig and detailed design stages of development. The strategy is required to address factors identified in the NPPF where these are relevant to the development and demonstrate how resilience will be achieved. As some risks are expected to create impacts in the longer-term, as acknowledged in NPPF, the strategy requires adequate management and maintenance arrangements to be demonstrated to ensure that adaptation measures will deliver resilience when it is required.

Q2. Policy NS10 requires that as a minimum all dwellings will meet the tighter Building Regulations water efficiency standard and that all other development will meet the BREEAM 'Excellent' standard. Is this approach justified?

The NPPF (paragraph 8) acknowledges that, in seeking to achieve sustainable development, the planning system has an environmental objective which includes using natural resources prudently and adapting to climate change. In addition, the Framework (paragraph 158) requires plans to take a proactive approach to adapting to climate change, taking into account longer-term implications for a range of factors including water supply, in-line with the objectives and provisions of the Climate Change Act 2008.

The Planning Practice Guidance (PPG) (Reference: 6-003-20140612) identifies a range of specific opportunities for integrating climate change adaptation into Local Plans, which include considering the availability of water and water infrastructure for the lifetime of the development and design responses to promote water efficiency. The Guidance (Reference: 56-002-20160519; 56-013-20150327; 56-016-20150327) also advises that planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of water where this is justified to help manage demand. It goes on to identify River Basin Management Plans, Water Resource Management Plans and the Environment Agency (EA) Water Stressed Areas Classification as potential sources of evidence.

Paragraph 5.93 of the DPD highlights that while the Yorkshire Water area is not currently defined as under serious water stress by the EA, forecasting of supply and demand in Yorkshire Water's 2021 adaptation plan (ODCC17) shows that declining availability of water due to climate change coupled with increasing demand will result in a deficit by the 2030s unless action is taken. The requirement for new homes to meet the tighter Building Regulations water efficiency standard, and for other development to meet the BREEAM 'Excellent' standard in respect of water use, responds to this finding and is in-line with Yorkshire Water's Water Resources Management Plan (ODCC18) and the emerging Water Resources North (WReN) regional plan (ODCC19), which both identify reducing average per capita consumption to 110 litres/person/day by 2050 as a key objective.

As the production of mains water reduces water in the natural environment and requires significant energy and chemical inputs, inclusion of the measures also contributes to the DPD meeting the Local Plan (SDNS14) policy DM4 requirement for the new settlement to be an exemplar of sustainable design and resource efficiency.

Q3. The submitted Flood Risk Sequential Test Report (Supporting Document SDNS05) highlights that the broad location for growth chosen for the new settlement included two sites that were assessed to be sequentially acceptable options. It also states at paragraph 3.10 that these sites could be delivered while ensuring that development only takes place within Flood Zone 1. What evidence is this assumption based on and does it take into account the effects of climate change and all sources of future flood risk?

Local Plan (SDNS14) policy GS2: Growth Strategy to 2035 identifies that development needs will be met in part by the delivery of a new settlement within a broad location for growth at Green Hammerton/Cattal and explains that a separate DPD will be brought forward to allocate such a site. The Flood Risk Sequential Test Report (SDNS05) sets out how the sequential approach to flood risk has been followed to inform the selection of a suitable site within the broad location, in-line with policy GS2. As context for this current work, the report also discusses how the sequential approach was used to inform the preparation of the Local Plan.

Paragraphs 3.1 to 3.10 of The Sequential Test Report summarises how the Local Plan approach of identifying a broad location at Green Hammerton/Cattal was selected. At paragraphs 3.9 and 3.10, this includes reporting that two sites within the broad location had been assessed as sequentially acceptable because they could be delivered without developing on land outside flood zone one and that this finding was in-line with the approach used to identify site allocations. The evidence to support this conclusion was set out in documents prepared in support of the Local Plan and is summarised in Section two of the DPD's Sequential Test Report.

Paragraphs 2.27 identifies that the Local Plan sequential test considerations of these sites were based on SFRA data and site-specific sequential test recommendations within the SFRA (ODCC20; ODCC21; ODCC22). As set out at paragraphs 2.20 and 2.31, site-specific recommendations took account of other sources of flooding, particularly surface water flooding, however, this and the effects of climate change did not inform sequential test findings in the way now required by current policy and guidance. The SFRA recommendations and the Local Plan sequential test were prepared in-line with national policy and guidance available at the time, NPPF (2012) and the Flood Risk and Coastal Change Planning Practice Guidance (FRCC-PPG), and the approach was found to be sound at Examination.

The current sequential assessment, carried out to inform the identification of the proposed allocation site within the broad location, is set out in sections four and five of the Sequential Test Report. As described in paragraphs 4.1 to 4.16, the method used is in-line with current national policy and guidance, and takes account of all sources of flood risk and future impacts of climate change.

Q4. Paragraph 5.100 of the DPD states that around 10% of the new settlement site is at high risk of river flooding as it is in Flood Zone 3a. Does this have any implications for the future delivery of development in the new settlement? Is any housing proposed in Flood Zone 3a? If so is this justified?

The reporting of around 10% of the site being within Flood Zone 3a (FZ3a) in paragraph 5.100 of the DPD is a 'worst-case' reflection of the 5-10% FZ3a and 90-95% FZ1 used in the sequential assessment of Option 3: Cattal Station Focus. However, the identification of precise boundaries for the option, as proposed for allocation, enables a more precise proportion to be calculated. In response to consultee comments at Regulation 19, a modification (M/CC/65) is proposed to

paragraph 5.100 in order to clarify the justification by reporting the calculated figures for the allocation site, 0.5% outside FZ1 (i.e., 0.5% within FZs 2 and 3 combined).

The proportion of the site classified as FZ3a does not have implications for the future delivery of the new settlement. Housing is not proposed in FZ3a. In order to accord with the sequential test findings, paragraph four of policy NS11 requires proposals to demonstrate no development on land at risk of river flooding (FZs 2 and 3).

Q5. How have the implications of the proposed new settlement on existing levels of surface water flooding in nearby settlements such as Cattal and Kirk Hammerton been considered?

Paragraph 165 of NPPF sets out an over-arching objective for planning and flood risk. In terms of off-site impacts, such as in nearby settlements, it requires development to not increase flood risk elsewhere. Paragraph 166 requires strategic policies to be informed by a strategic flood risk assessment (SFRA), manage risk from all sources, consider cumulative impacts and take account of advice from the Environment Agency (EA), lead local flood authority (LLFA) and internal drainage boards (IDBs). Paragraph 167 bullet c requires the use of opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding. Finally, paragraph 175 requires major development to incorporate sustainable drainage systems (SuDS).

While the Council does not consider NS11 to be a strategic flood risk policy, it nevertheless addresses all sources of flood risk present and its preparation has been informed by an SFRA (ODCC20, ODCC21) and engagement with the EA, LLFA and IDBs.

To reduce the causes and impacts of flooding the Planning Practice Guidance (PPG) (Reference ID: 7-062-20220825) identifies the use of SuDS and natural flood management techniques. The use of SuDS is required by NS11 and, in-line with NPPF, the policy requires acceptable systems to take account of LLFA advice, meet minimum operational standards in terms of storage and discharge rates, have adequate whole-life maintenance arrangements and provide multifunctional benefits where possible.

NS11 requires the integration of natural flood management techniques with green blue infrastructure (GBI) provision and SuDS to maximise multifunctional benefits whilst minimising land-take. This includes requiring land at risk of river flooding or expected to be at risk due to climate change over the lifetime of the development to remain undeveloped and be incorporated into the GBI network. In addition, the drainage strategy is required to maintain the existing surface water regime and integrate overland flows within the design. To facilitate this, land at risk of surface water flooding over the lifetime of the development is also required to remain undeveloped and be incorporated in the GBI network and within these areas the policy encourages additional surface water features to provide additional storage. Also relevant to natural flood management, in response to EA and LLFA comments at Reg 19, a modification (M/CC/64) is proposed to NS11(along with a consequential modification to the supporting text-

M/CC/82) to highlight that the existing requirements of Local Plan (SDNS14) policy CC1 in relation to culverts and canalised watercourses continue to apply.

When determining planning applications, paragraph 173 of NPPF requires the Council to ensure that development does not increase flood risk elsewhere. NS11, therefore, includes this requirement. In response to comments at Reg 19, modifications (M/CC/57, M/CC/58), along with a consequential modification to the supporting text (M/CC/70), are proposed to clarify this need by using terminology more reflective of that used in NPPF. NS11 also requires the development to take reasonable opportunities to reduce wider flood risk. Again, a modification (M/CC/63), along with a consequential modification to the supporting text (M/CC/81) is proposed to ensure the requirement uses the NPPF terminology of reducing the causes and impacts of flooding. In-line with paragraph 173, NS11 requires a site-specific flood risk assessment (FRA) and sets out detailed requirements to ensure that compliance with the wider NS11 requirements can be assessed. These include identifying vulnerabilities to flooding, including in the immediate vicinity, as well as opportunities to increase resilience. In response to EA comments at Reg 19, a modification (M/CC/61), along with a consequential modification to the supporting text (M/CC/75) is proposed to clarify that this requirement relates to reducing flood risk overall, as per NPPF.

Q6. Is it clear to decision-makers, developers and local communities what is required to mitigate the impacts of development on drainage and surface water flooding?

The requirements for proposals to mitigate the impacts of development on drainage and surface water flooding, as well as other sources of flooding, are set out clearly in policy NS11.

Paragraph 1 requires proposals to avoid development on land at risk of flooding, not increase flood risk (and use opportunities to reduce flood risk), and not reduce resilience to flooding (and use opportunities to increase resilience). In response to comments received at Regulation 19, modifications are proposed to para 1 (M/CC/57; M/CC/58) and the supporting text (M/CC/70) to provide greater clarity on these over-arching requirements by using terminology closer to that in the NPPF.

Paragraph 2 requires proposals to be based on a site-specific flood risk assessment (FRA) and sets out requirements for the FRA including addressing all sources of flood risk, providing evidence of the flood risk characteristics of the Kirk Hammerton Beck, taking account of local sources of flood information, consideration of overland flows, being based on appropriate climate change allowances and identifying vulnerabilities to flooding as well as opportunities to increase resilience.

In response to comments received at Regulation 19, modifications are proposed to para 2 and supporting text. M/CC/59 clarifies that the requirement for evidence of the flood risk characteristics of the Kirk Hammerton Beck is to complement existing evidence and M/CC/71 amends the supporting text to clarify the justification for further evidence. M/CC/60 amends terminology to clarify that climate change allowances should cover the lifetime of the development, as required by NPPF, with consequential modifications to the supporting text

proposed through M/CC/72, M/CC/73 and M/CC/74. M/CC/61 amends terminology to clarify that the FRA should seek opportunities to reduce flood risk overall, in-line with NPPF.

Paragraph 3 requires proposals to be in-line with an approved drainage strategy that is based on the FRA and incorporates sustainable drainage systems (SuDS) whilst demonstrating that the drainage hierarchy set out in Part H of the Building Regulations is followed. It also requires the strategy to maintain the existing surface water regime and integrate overland flows within the design, where possible; provide sufficient surface water storage to accommodate the 1 in 100 year rainfall event plus allowances for climate change and urban creep, and limit discharge rates to acceptable levels; provide multifunctional benefits, where possible; include management and maintenance arrangements; and accord with relevant guidance.

Paragraph 4 requires proposals to be in-line with an approved masterplan that is based on the FRA and shows no development on land at risk of river flooding (including land at risk due to climate change)- with these areas incorporated into the green blue infrastructure (GBI) network, no development on land at risk of surface water flooding (including land at risk due to climate change)- with these areas incorporated into the GBI network and used to locate additional surface water features that contribute to storm water attenuation, identifies the main components of the drainage strategy and takes opportunities to reduce wider flood risk and increase resilience.

In response to comments received at Regulation 19, modifications are proposed to para 4 and supporting text. M/CC/63 amends the wording of the final masterplan requirement so it more closely aligns with NPPF terminology by describing the aim as 'reducing the causes and impacts of flooding' rather than 'reducing wider flood risk and increasing resilience' and by highlighting opportunities provided by improvements in GBI and other infrastructure alongside opportunities provided by the development. Consequential changes to the accompanying text are proposed through M/CC/81. In addition, M/CC/62 adds the NPPF requirement of ensuring safe access and egress, with M/CC/79 and M/CC/80 including the addition of consequential guidance to the supporting text.

In response to comments received at Regulation 19, modification M/CC/64 proposes to add paragraph 5 to highlight that the existing requirements of Local Plan policy CC1 in relation to culverts continue to apply. These requirements limit the ability to create culverts and encourage the re-opening of existing culverts. M/CC/82 proposes consequential additions to the supporting text.

Following modification, as proposed, it is considered that the requirements for proposals to mitigate the impacts of development on drainage and surface water flooding are clearly set out.

Q7. What evidence can the Council point to which suggests that the measures set out in Policies NS10 and NS11 are deliverable and that these policies are effective?

<u>NS10</u>

The policy requires a settlement-wide climate resilience strategy that addresses locally specific climate change impacts expected to arise under credible predictions of reasonable worst-case climate scenarios. Paragraph 5.85 of the supporting text explains that this requires adaptation measures to be based on projections of the extent of likely future warming under realistic carbon reduction trajectories and the types and scale of risk this warming will present at Maltkiln. This approach will help to ensure that resources can be focussed on delivering effective adaptation to quantified impacts likely to arise locally rather than being spread across a wide range of unquantified generic impacts expected for the UK that may not be seen at Maltkiln. The paragraph identifies that climate projections are produced by the UK Met. Office and that the UK Climate Change Risk Assessment (2022 and successive updates) along with the Independent Assessment of UK Climate Risk can be used to help identify specific risks under various warming scenarios. It also highlights that Environment Agency climate change allowances have been developed to enable increased flood risk to be quantified.

NS10 identifies a need for people and property to be safe from flooding in recognition that increased flood risk is a widely acknowledged climate impact. However, detailed requirements to ensure future resilience are set out in policy NS11 alongside other flood risk policy.

NS10 seeks to ensure that building do not overheat. As set out at paragraph 5.89, the approach recognises the intention of government to control the risk of overheating in new residential buildings through standards set out in Part O of the Building Regulations (now in place). NS10 complements this with a requirement for overheating approaches to follow the cooling hierarchy to ensure that cooling needs are considered in the design process by incorporating passive design measures, as required by NPPF, so the need for active cooling, such as air conditioning, is minimised where possible. As active cooling is energy intensive, the approach supports the NS7 ambition of reducing operational emissions from buildings and reducing annual energy demand.

NS10 requires dwellings to meet the tighter Building Regulations water efficiency standard and all other development to meet the BREEAM 'Excellent' standard for non-domestic buildings in respect of water use. The optional tighter water efficiency standard was introduced as a potential planning tool in 2015. On 1 September 2022 the government wrote to council Chief Executives to encourage its application, highlighting that designation of an area as 'under serious water stress' would be sufficient evidence. The letter, which is appended to this response (Appendix 1), contains a map showing areas subject of this designation, which identifies that the majority of England is designated. As the standard is now well understood by developers and is expected to apply to most development in England, it is considered that its application is deliverable. Under Local Plan (SDNS14) policy CC4 an existing requirement for non-domestic development to meet the BREEAM 'Excellent' standard has been successfully applied since 2020.

NS11

To accord with the sequential test supporting the allocation site, NS11 requires that no built development takes place on land at risk of river or surface water flooding now or over the lifetime of the development as a result of climate change. Table 4.3 of the Flood Risk Sequential Assessment (SDNS05) concludes that there is sufficient available land within the broad location to define boundaries for a site allocation based on Option 3: Cattal station focus that would deliver the minimum quantum of development required by Local Plan (SDNS14) policy DM4 whilst not developing on land at risk or expected to be at risk due to climate change.

The sequential assessment was based on a consideration that the site would be generally at low risk of flooding but contain up to 5-10% at risk of river flooding i.e., flood zones two and three (FZ2 and FZ3) as well as land, likely to be a little over 10%, at risk of surface water flooding. It acknowledges that SFRA data does not quantify the amount of additional land that will become subjected to flood risk due to climate change but recognises that due to local topography these additional areas are expected to be marginal.

Following the definition of site boundaries, the Maltkiln allocation is 294 hectares. In-line with the Council's standard approach for large sites, a net developable area of 55% (161.7ha) would be estimated as the area on which the development required by DM4 i.e., predominantly at least 3000 dwellings, 5ha employment land but also associated uses including a local centre (NS26: 3ha) and schools (NS28: 5.9ha), would need to be accommodated. If housing delivery occurs at an average of 30dph, DM4 requirements could be accommodated on 113.9ha, while delivery at an average of 25dph would require 133.9ha. Delivery at either of these densities could easily be achieved within the developable area of the site.

As set out in the proposed modification to DPD paragraph 5.100 (M/CC/65), the proportion of the site at risk of river flooding has been calculated as 0.5%, significantly less than the estimated amount used in the sequential assessment. This, together with the estimated extent of surface water risk used in the sequential test, would require 12.5% (36.75ha) of the site to be undeveloped to avoid current flood risk areas, easily achievable within the non-developable 45% of the site (132.3ha); and while the extent of further land to be avoided to ensure that areas which will become subject to risk due to climate change are not developed is not quantified, the extent of the remaining undevelopable portion (95.55ha) provides confidence that the allocation includes sufficient land to also avoid these areas. On this basis it is considered that according with the avoidance approach of the sequential test is deliverable.

NS11 also requires development to not increase flood risk elsewhere and use reasonable opportunities to reduce the causes and impacts of flooding. The need for decision makers to ensure that flood risk is not increased elsewhere has been required across England since the introduction of the NPPF in 2012 and has, therefore, been demonstrated by successful applications for many years. Given the large size of the allocation relative to the development it is required to accommodate, it is considered that the site provides sufficient opportunities to store water on-site and limit discharges to acceptable levels. The requirements for provision of significant green blue infrastructure (NS11 and NS12) and an acceptable drainage strategy

incorporating SuDS provide opportunities to reduce the causes and impacts of flooding allowing this aspect of the policy also to be met.

Q8. What is the justification for the suggested changes to Policies NS10 and NS11 and their respective supporting text? Why are they necessary for soundness?

NS10

Following the Reg 19 consultation several modifications are proposed to NS10. M/CC/49 and accompanying modifications to the supporting text (M/CC/53, M/CC/54) are proposed to specifically highlight the role trees can play in adapting to climate change, as acknowledged in NPPF (para 136), and to ensure the policy more closely reflects NPPF requirements for tree-lined streets. M/CC/50 is proposed to improve effectiveness by ensuring that all potential measures discussed in the supporting text are referenced in policy and clarifying that these need to be considered but only incorporated where appropriate. In addition, M/CC/48, M/CC/51 and M/CC/52, are proposed in order to give greater clarity that the requirements of the policy must be met. Finally, the supporting text is proposed to be changed through M/CC/55 to ensure the approach is justified by clarifying that use of the term 'water stressed' relates to the Environment Agency's definition of water company areas under serious water stress.

NS11

Following the Reg 19 consultation a series of modifications are proposed to NS11 and supporting text. M/CC/65 updates evidence in the supporting text and is discussed in response to Q4. The following modifications to policy (and consequential changes to the supporting text) are discussed in response to Q5: M/CC/61 (M/CC/75); M/CC/57 and M/CC/58 (M/CC/70); M/CC/63 (M/CC/81); and M/CC/64 (M/CC/82). The following modifications to policy (and consequential changes to the supporting text) are discussed in response to Q6: M/CC/59 (M/CC/71), M/CC/60 (M/CC/72, M/CC/73 and M/CC/74), and M/CC/62 (M/CC/79 and M/CC/80).

In addition, further modifications are proposed. M/CC/66 changes the supporting text to clarify the justification by referencing NPPF requirements. M/CC/76, M/CC/77 and M/CC/78 add detail to the supporting text, including signposting external guidance, to improve effectiveness following request from statutory consultees. While M/CC/68 and M/CC/69 explain the justification more clearly by clarifying information contained in the Sequential Assessment report within the supporting text. Finally, two minor modifications not considered necessary for soundness are proposed. M/CC/56 sequentially numbers the paragraphs in the policy and M/CC/67 is a grammatical change.

Appendix 1:

Letter from Steve Double MP, Parliamentary Under Secretary of State, Department for Environment, Food and Rural Affairs to Chief Executives of Local Authorities in England, dated 1 September 2022.

Department for Environment Food & Rural Affairs

Steve Double MP
Parliamentary Under Secretary of State

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Chief Executives
Local Authorities in England

01 September 2022

Dear Chief Executive,

Water efficiency in new homes

Climate change and population growth are increasing pressure on our water resources. The latest regional water resources plans suggest we will need an additional 4,000 million litres of water a day by 2050. Half of this will need to come from reducing demand for water.[1] The growing population of England requires new housing that enables people to use water in a sustainable way.

Our 2021 Written Ministerial Statement on reducing demand for water included an action to write "to local authorities to encourage them to adopt the optional minimum building standard of 110 litres per person per day in all new builds where there is a clear local need, such as in water stressed areas".[2] This is an interim measure to support increased water efficiency in advance of publishing a roadmap on water efficiency in new developments and retrofits in 2022 and exploration of revised building regulations. Local Authorities in England adopting this standard will help us meet our proposed Water Demand Target under the Environment Act 2021.[3]

Recognising the clear need for immediate reduction in water use, ***we encourage Local Authorities to apply the tighter standard of 110 litres per person per day (l/p/d) set out in the 'Housing: optional technical standards' guidance and prescribed by regulation 36(2)(b) of the Building Regulations 2010'***.[4] Using the latest evidence, the Environment Agency has published its recommendation that additional areas in the South, East and the Midlands should be designated as in serious water stress (see map attached). In these areas this evidence can be used by Local Planning Authorities to establish a clear local need to set out Local Plan policies requiring new homes to meet this optional tighter standard of 110 l/p/d.

Water companies may provide a developer incentive for meeting this standard or lower (e.g. United Utilities, Severn Trent and Northumbrian Water provide a discount or zero

[1] Environment Agency Review of England's emerging regional water resources plans.
[2] 2021 Written Ministerial Statement on reducing demand for water.
[3] Environment Act 2021: environmental targets consultation.
[4] Housing: optional technical standards - GOV.UK (www.gov.uk).

charge for homes built to 100 l/p/d or 105 l/p/d).[5] The United Utilities discount has saved developers more than £25m and created a potential saving of 3.8 million litres of water per day. This approach is supported by the Home Builders Federation and we encourage more water companies to utilise these incentives.[6]

We encourage the use of the Fittings Based Approach (Tables 2.1-2.2 in the Approved Document which supports Regulation 36 and Part G of Schedule 1 of the Building Regulations 2010).[7] Research by water companies using smart metering data has observed higher water consumption in new build homes compared with their design standard, most often developed with the water efficiency calculator approach in accordance with Appendix A of the Approved Document. Using a fittings-based approach ensures that water efficient products are installed and reduces the uncertainty around occupancy impacting demand for water. Some companies may provide a developer incentive for using a fittings-based approach (e.g. £200 per home from Thames Water).[8] This will also save developers and local authorities costs in using the calculator in planning.

We are working with water companies to reduce leakage and to develop new water resources as part of a twin-track approach to managing supply and demand. We will also introduce mandatory Water Efficiency Labelling for certain water using products, which will inform consumers and encourage the purchase of more water efficient products for both domestic and business use.

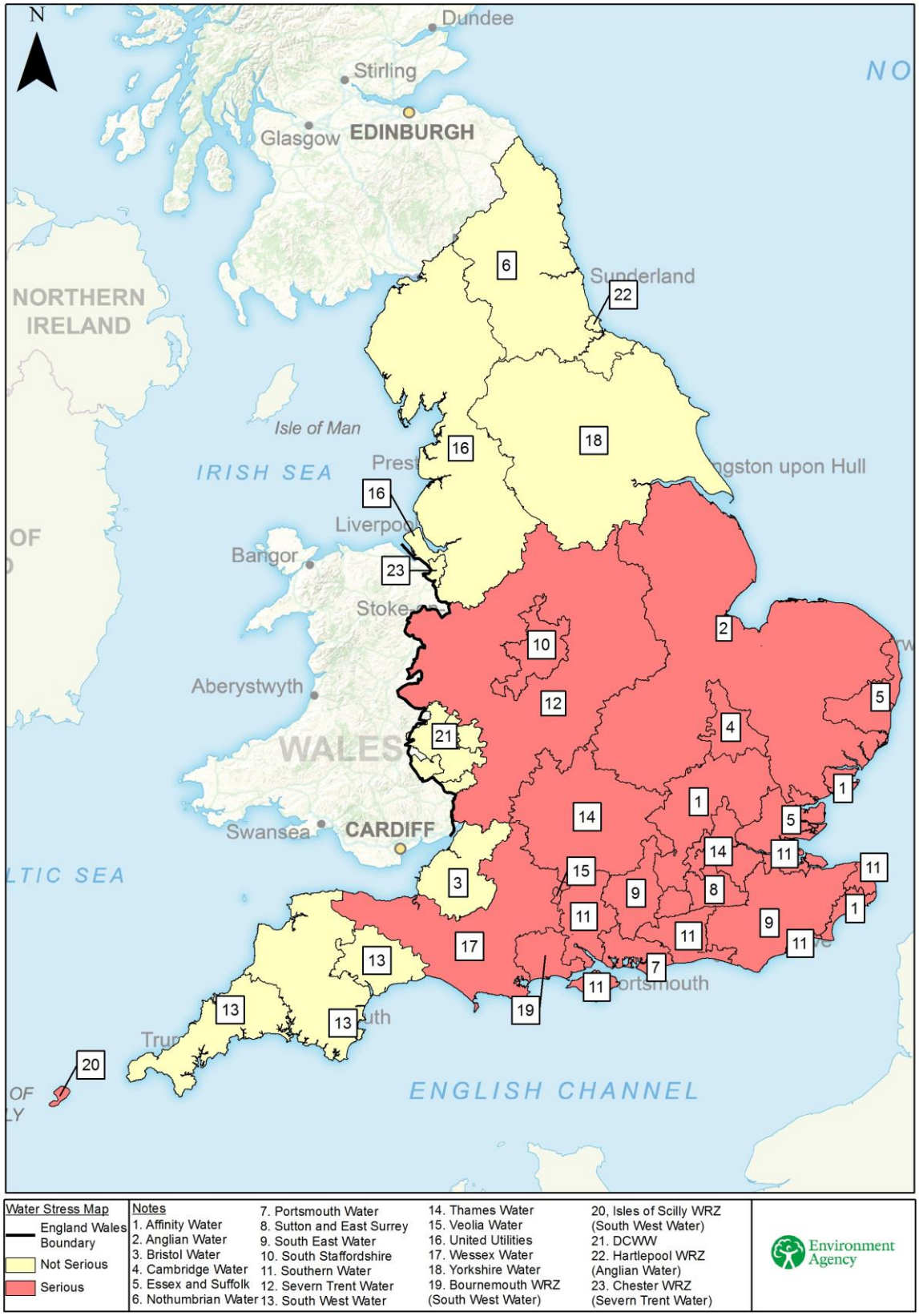
Through encouraging greater water efficiency Local Authorities can support protecting the environment and resilience to climate change. Reducing hot water use can also significantly reduce energy use and carbon emissions.[9] This letter is supported by the Department for Levelling Up, Housing and Communities and we will work with Local Authorities, developers and other stakeholders as we develop our roadmap on water efficiency in new developments and retrofits.

Yours sincerely,

STEVE DOUBLE MP

[5] Infrastructure charges – Severn Trent Water; Infrastructure charges – Northumbrian Water 2022-23.
[6] United Utilities – New Water Efficient Homes.
[7] Approved Document G – Sanitation, hot water safety and water efficiency; Sanitation, hot water safety and water efficiency: Approved Document G - GOV.UK (www.gov.uk).
[8] Thames Water press release on developer incentive.
[9] Waterwise – Net Zero and the role of water efficiency.

Attachment – Environment Agency Water Stress Assessment 2021[10]



[10] https://www.gov.uk/government/publications/water-stressed-areas-2021-classification.