

Waterwise Response to CLG Consultation on

Planning Policy Statement: Planning for a Low Carbon Future in a Changing Climate

May 2010

Waterwise is an independent, not for profit, non-governmental organisation focused on decreasing water consumption in the UK and building the evidence base for large-scale water efficiency. We are the leading authority on water efficiency in the UK. In England, we sat on the UK Environment Minister's Water Saving Group alongside the water industry and regulators, for which we produced, in October 2008, the Evidence Base for Large-scale Water Efficiency in Homes. Phase II of the Evidence Base is co-funded by CLG.

Context

There are considerable opportunities for water efficiency to contribute to meeting the new challenges of climate change and population growth. Water efficiency is unique in that it is a key tool in both mitigation of and adaptation to climate change.

Water efficiency is essential for mitigation, because of the carbon costs of heating water in homes, buildings and offices for cooking, bathing and cleaning (in homes this accounts for 5% of the UK's total greenhouse gas emissions), and for industrial processes. Wasting less hot water reduces the carbon footprint at the user end, but it also does so at the supplier end, as the water company is required to pump and treat less water and wastewater.

So water efficiency can make significant, quantified contributions to the UK's carbon targets of 34% by 2020 and 80% by 2050.

Water efficiency is also essential to the UK's climate change adaptation plans – every sector of the economy is dependent on water, some areas of the UK are already suffering water stress (with some classified by the Environment Agency as suffering "serious water stress"), and it is known that in the near future there is going to be less water and more people in the UK: so less water will need to go further.

Overall response

Waterwise welcomes the consultation and the proposal to bring together measures to address climate change and adapt to it within the planning framework. We also welcome the recognition that planning has a role in ensuring development does not exacerbate water shortages and drought.

Water efficiency plays an essential role in reducing carbon emissions and making less water go further, in the context of climate change.

Waterwise would like to see water neutrality as a standard planning requirement for new developments, to help manage climate-related risks of water scarcity. Water neutrality would require developers to undertake water efficiency measures in businesses, schools,

hospitals and homes in the same area as a new development, to ensure overall water demand does not increase. ***Waterwise would also like to see water efficiency more integrated in plans for a low carbon future.***

Waterwise is supportive of the measures put in place in recent years to drive water efficiency in new homes in England and Wales. The Code for Sustainable Homes and the introduction of water efficiency into Building Regulations are beginning to drive the market for water-efficient new homes and products.

For the Code, Waterwise has sat on working groups during its development, and also works with developers and planning authorities on implementing it to deliver water efficiency through Waterwise East, in the driest region in the UK.

Waterwise appreciates the pressures on the housebuilding sector as a result of the global economic situation.

However, as water efficiency has an essential role to play in both climate change mitigation and adaptation (see “Context” above) - and therefore to contributing to energy efficiency achieved through the Code and to zero carbon homes - ***Waterwise would like to see a commitment to consulting within the next twelve months on mandating level 3 of the Code for all new homes.*** In addition, to tackle the wider problem of existing homes, and to help make them zero carbon, ***Waterwise urges the government to consult as soon as possible on the review of the Water Fitting Regulations, which was due in 2009, and to include water efficiency in its national energy efficiency retrofitting programme.***

Waterwise and the Bathroom Manufacturers’ Association are developing a functional web-based calculator to help developers meet the water efficiency requirements set out in the Code and in Building Regulations. Local Authority Building Control has offered support for this calculator.

Responses to specific questions

Question 2: Does the proposed PPS address sufficiently all the issues that planners face in relation to climate change? If not, what is missing and why?

Water efficiency is unique in that it is a key tool in both mitigation of and adaptation to climate change.

In this context, we welcome the proposal that planning authorities in areas of water stress should be able to set water standards, as an alternative to mandating whole Code standards. ***Waterwise would like these standards to be set at level 3 or higher of the Code for Sustainable Homes.***

We welcome the proposal within LCF2.1 and LCF5.1, that “In areas of water stress, and so as to secure development that would otherwise be unacceptable for its proposed location, resilience should be provided by setting sub-regional standards for water usage in new development”. ***We propose that planning authorities require these standards to be at level 3 or higher of the Code for Sustainable Homes.***

However, the proposed PPS does not mention the impacts of water efficiency in reducing carbon emissions. **Waterwise would like the new PPS to contain a specific requirement for water neutrality** – requiring developers to undertake water efficiency measures in businesses, schools, hospitals and homes in the same area as a new development, to ensure overall water demand does not increase. This would drive innovative development and community acceptance, as well as saving carbon, water and money (on bills).

There is a great deal of uncertainty as to whether an underground water tank requires planning permission, so clear guidance of the steps councils and developers should take with regard to underground tanks would also be beneficial.

Question 6: We propose that sites that perform poorly against the criteria in policy LCF6.1 should not be allocated for development (with limited exceptions). Do you agree with this suggested approach?

Waterwise broadly welcomes LCF6.1, but there are factors that should be taken into account. Water neutrality (and water efficiency more generally) would contribute directly to “v” within LCF6.1. In addition, water efficiency can help alleviate the problems of flooding through reducing waste water flows in sewer systems.

Question 8: Do you agree with the approach to setting requirements for sustainable buildings including in water stressed areas?

Yes. Waterwise believes that all new builds, especially in water stressed areas, should be water neutral, and that other buildings in the area should be retrofitted with water-saving devices to help them save water, save money (on energy and water bills) and save carbon.

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