

FAO: Adrain Tofts
Maldon District Council
Planning Department
Princes Road
Maldon
Essex
CM9 5DL

Our ref: AE/2006/000051/CS-05/SB1-L02
Your ref: *
Date: 17 October 2016

Dear Mr Tofts

MALDON DISTRICT LOCAL DEVELOPMENT PLAN CONSULTATION

Thank you for notifying us that the council are consulting on the following documents:

1. Implications of the DCLG 2014-Based Household Projections for the Objectively Assessed Housing Needs of Maldon District
2. Proposed Main Modifications to the Maldon District Local Development Plan
3. Sustainability Appraisal Report Update

We have no comments to make on the Household Projections document, but offer the following advice on the main modifications and SA update.

Reference number 004

We support this amendment.

Reference number 009

We assume this change has been proposed following discussions with Anglian Water. We support the update.

Reference number 062

We assume these change has been proposed following discussions with Anglian Water. We support these updates.

Reference number 016

This amendment reflects the removal of the Code for Sustainable Homes (CfSH), with developers now needing to meet the standards set by Building Regulations.

With regards to water usage, the CfSH set the following standards:

Code level:	Water consumption (litres/person/day (l/p/d))
1 and 2	120
3 and 4	105

Your policy previously required new residential developments to achieve a level 4 – 105l/p/d. Building regulations have a standard requirement for homes to achieve 125l/p/d. This amendment to your local plan is therefore significantly relaxing the water usage standards that new development is required to meet.

In addition to the 125l/p/d water consumption target, the building regulations also set a tighter standard of 110l/p/d that councils can require developers to meet where there is a local need. The Planning Practice Guidance ([Paragraph: 014 Reference ID: 56-014-20150327](#)) supports this being required through Local Plans. As highlighted in our 2014 pre-submission representations, we highlighted that your Water Cycle Study (WCS) identified the need for water efficiency / reduction in consumption. We would therefore strongly encourage you to reference the tighter building regulation standards in point 2 of policy D2.

We also note that your SA update has not identified the impacts of this amendment to policy D2, advising there is no change to the original SA conclusions. We consider the policy amendment weakens meeting SA objectives 8 and 13, and that this should have been reflected in the SA update.

Local need for tighter water consumption standards

As referenced above, your WCS identified the need for water efficiency / reduction in consumption. Maldon lies within an area classified as ‘serious water stress’ ([Water Stressed Areas Classification \(2013\)](#)), so steps should be taken to ensure that growth is not exacerbating the issue. The Planning Practice Guidance references this classification as evidence to support seeking the higher efficiency standard ([Paragraph: 016 Reference ID: 56-016-20150327](#)).

Potable water used in Maldon is drawn largely from Hanningfield reservoir. This is ultimately supplied from surface water abstractions on the rivers Blackwater and Chelmer, which are just above the protected habitat of the Blackwater Estuary. This habitat is heavily reliant on freshwater inputs from the Chelmer and Blackwater to maintain protected features, and as such any increase in abstraction from these rivers should ideally be avoided, or at least kept to a minimum. This is also required to support the ‘no deterioration’ objective of the Water Framework Directive.

Furthermore, the Blackwater receives support when required from the Ely Ouse to Essex transfer Scheme, which ensures a supply of water to Essex and Suffolk Water for their abstraction. This scheme pumps water to Essex from the Norfolk/Cambridgeshire border, and as such has a very large carbon footprint. Reducing or minimising the increase in demand for potable water will help to keep use of this very carbon-intensive system to a minimum.

Reference number 022

We support this amendment.

Reference number 023

We support this amendment.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Jo Firth', with a stylized flourish at the end.

Mrs Jo Firth
Sustainable Places Team

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