

Canterbury City Council
Council Offices
Military Rd
Canterbury
CT1 1YW

16th November 2022

Dear Planning Team,

Thank you for the opportunity to provide comments regarding the Draft Local Plan. We have considered the files you have shared with us, please see our comments set out below.

There are three key factors we analyse when reviewing proposed sites and number of homes. Firstly, if any of the sites are within a groundwater Source Protection Zone (SPZ); secondly, the location of any existing water network or other interests in the proposed area; and finally, whether the current infrastructure in the area sufficient to meet additional requirements.

Groundwater Source Protection Zones (SPZ)

We have reviewed the sites for potential allocation in relation to our nearby groundwater sources and associated Source Protection Zones (SPZs). None of the sites identified are within or close to a SPZ relating to one of our sources and we therefore do not have significant concerns for developments relating to potential contamination of our sources. Within our service area, site R20 is within SPZ2 but this does not relate to one of our sources.

Existing water network

There is no impact on existing mains for any of the sites within our supply area. However, it is worth noting that there is an interconnection point between Southern Water and us just outside the boundary of site R1. The affected pipe is within Southern Water's area and within the boundaries of proposed site R1; this is something we would expect Southern to comment on.

Local Authorities can obtain free infrastructure maps from us, including access to our external facing GIS called 'NRSWA'. We can also supply infrastructure information as data, and we will supply this free of charge but usually only under a Non-Disclosure Agreement (NDA). If this is something you would like to pursue, please write to us via our maps@affinitywater.co.uk mailbox. A guide for working near our assets can be found at the following link: <https://www.affinitywater.co.uk/docs/developer/Building-Near-Pipes-Apparatus-Guide-17-04-2019-final.pdf>.

Current infrastructure and future requirements

Only two allocated sites fall within our supply area:

- R20 – 420 dwellings
- R23 – 9 dwellings

No phasing information has been provided during this consultation and therefore we cannot provide detailed comments regarding future requirements. As there is only one large site proposed within our supply area (R20), we request phasing information is provided as soon as possible and that we are consulted on the future planning application at this site.

Water resources

We are committed to reducing leakage and helping our customers reduce their water consumption, to ensure that we take only what is necessary from the environment. We hope that creating sustainable communities is a priority for local authorities and developers. It is fundamental to consider water sustainability in the long-term for all new homes, as this will potentially impact economic and population growth and the local environment.

Every local authority within our supply area is encouraged to have a water use target set for new development of 110 litres per person per day or less, as per the Building Regulations part G. Plans which include new developments should therefore clearly include the requirement of 110 l/h/d for new builds. We welcome that the Draft Plan highlights the requirement to meet this standard and that Policy DS6 requires residential schemes of more than 10 dwellings to have a water system designed to achieve a per capita consumption of 90 l/h/d, whilst proposals of less than 10 dwellings should also aim for this. It is essential that these requirements and standards are enforced and monitored by the Council, including post occupation.

We also expect the following for new developments:

- The use of water efficient fittings and fixtures such as rainwater harvesting, rainwater storage tanks, water butts, green roofs, and water efficient appliances in all new developments (residential and commercial).
- The means by which monitoring of the implementation of the water consumption target in new homes post occupation to be determined by the local authority and should be implemented on all new developments.

The effective implementation of these requirements will help the environment by reducing pressure on water resources. These measures can also minimise potable water use by reducing the amount of potable water used for washing, cleaning, and watering gardens. This in turn reduces the carbon emissions associated with treating this water to a standard suitable for drinking and will help to keep emissions down in the area.

Whilst new homes and commercial developments may be built with water efficient fixtures, fittings and devices, these could be removed after occupation. We believe that a partnership between local authorities, residents and Affinity Water is essential to help educate customers about their use of water and how all parties can work together to protect this vital resource.

Further information

The water industry is regulated in five-year periods and our business planning reflects this. Our revised Business Plan for 2020-2025 has been published as well as our WRMP which sets out how we will maintain our supply and demand balance over the next 60 years (2020 - 2080) and accounts for population growth based on local authority growth forecasts. We will continue to liaise with local authorities to ensure their proposed levels of growth are adequately considered in our planning process.

We continually monitor the performance of our distribution system and put in place measures to ensure high quality water supply and pressures are maintained. We will continue to work with the local planning authority and developers to ensure that infrastructure is in place in line with the pace of development and that realistic forecasts of development phasing is used to plan the infrastructure needs.

Water companies have a duty to supply water for domestic purposes to customers under Section 52 of the Water Industry Act 1991 and are hence obliged to connect developments to the network once planning permission has been received. Any localised upgrades to existing supply networks are likely to be funded from the usual water developer requisitions and investment processes.

Developers are encouraged to discuss their proposals with us in advance of the submission of any planning applications utilising our pre-application advice service at: <https://www.affinitywater.co.uk/developer-services.aspx>

Please let us know if you have any questions or if you would like to discuss any of the above. Thank you for your consideration.

Yours faithfully,

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