

Additional Evidence of United Utilities Water Limited (U UW) to Support the Tighter Standard for Water Efficiency in the Construction of New Residential Development

U UW recommends that the local plan includes a policy requirement for new development to be built to the optional water efficiency standard prescribed in Building Regulations. A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills.

At the current time, Building Regulations includes a requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In 2015 an ‘optional’ requirement was introduced which is currently set at 110 l/p/d for new residential development. This can be implemented through local planning policy where there is a clear need based on evidence as outlined in [Housing: optional technical standards in the National Planning Practice Guidance](#). In addition to the latest evidence produced by Water Resources West (included as a separate document as part this submission, we wish to note the following additional pieces of evidence:

- U UW has published an updated [Water Resource Management Plan 2024 \(WRMP2024\)](#); and
- Updated evidence on the cost of implementing the tighter optional standard for water efficiency is published. See [Table 3 of Water Ready A report to inform HM Government’s roadmap for water efficient new homes](#).

United Utilities Final Water Resource Management Plan 2024

In accordance with guidance in the [National Planning Practice Guidance](#), a water resource management plan is primary evidence that supports the implementation of the optional standard for water efficiency in the construction of new homes. U UW has recently published an updated Water Resource Management Plan 2024. Page 74 states:

‘Based on our commitments to reduce demand for water, to support water resources resilience and reduce our impact on the environment, we are requesting that all local authorities in our supply area adopt the optional minimum building standard of 110 litres per person per day (lppd) in all new builds. We already incentivise water efficiency in new builds, by offering a 90% reduction in water charges to developers building water efficient homes which include measures to reduce water use to 100 lppd. This scheme was launched in 2018 and initially targeted a standard of 110 lppd, but due to the success of the scheme and to encourage further improvements in water efficiency, we reduced the threshold to 100 lppd in 2021. To date, more than 86,000 plots have been registered with many of these already built, creating savings of £25m for developers. A similar reduction on wastewater charges is available for properties featuring sustainable drainage, and both schemes are still available to developers building homes in the North West.’

The National Planning Practice Guidance is clear that there are a range of pieces of evidence that can be submitted to justify the implementation of the optional standard for water efficiency. It specifically references river basin management plans and water resource management plans as primary sources of evidence (see paragraph: 016 Reference ID: 56-016-20150327). We wish to

expand on the detail of these primary sources of evidence, in particular, the Water Resource Management Plan 2024 (WRMP24) for UUW.

WRMPs must be prepared to comply with the latest regulatory guidance. Reflecting the challenges presented by climate change, a key change to the regulatory guidance since our previous WRMP is the requirement to demonstrate resilience to 1 in 500 year droughts by 2039. Previously the requirement was to be resilient to a 1 in 200 year drought. The Environment Agency’s Water Resources Planning Guidelines state that WRMPs should consider the supply-demand balance at times when a company’s supplies are low, and demand is high. The baseline scenario to be adopted for companies in England should be the Dry Year Annual Average scenario.

The WRMPs of water companies are also expected to take account of government aspirations for leakage reductions and reductions in per capita consumption (PCC) in their final plans. These are set out in the National Framework for Water Resources (2020) in which the government sets out ambitious targets for the industry to reduce water consumption to 110 litres of water person per day and halve rates of leakage by 2050. This strategic choice is effectively, therefore, a regulatory expectation.

WRMPs must also align with the relevant regional plan. For UUW, this is the regional plan developed by the Water Resources West regional group. The Water Resources West Regional Plan 2025 and associated evidence recommends the implementation of the optional standard for water efficiency in the Water Resources West Region.

UUW supplies water to four separate water resource zones. These include the Strategic Resource Zone (*the SRZ*), which serves in excess of seven million people and covers the vast majority of the North West. UUW supplies water to parts of Cheshire West and Chester. These areas fall within the SRZ.

UUW has now published a Final Water Resource Management Plan 2024 (WRMP24) for the period 2025-2050. This sets out the baseline supply-demand balance for water resources, i.e., the difference between the water demanded and the water that can be supplied within the SRZ. It shows that without the drought supply and demand measures included in our drought plan, there is a potential deficit in the SRZ, of 52.6 mega litres per day (ML/d) in 2025/26 and without new interventions this rises to 314 ML/d by 2049/50. This deficit is illustrated in the below table and figure, which are extracted from our WRMP24.

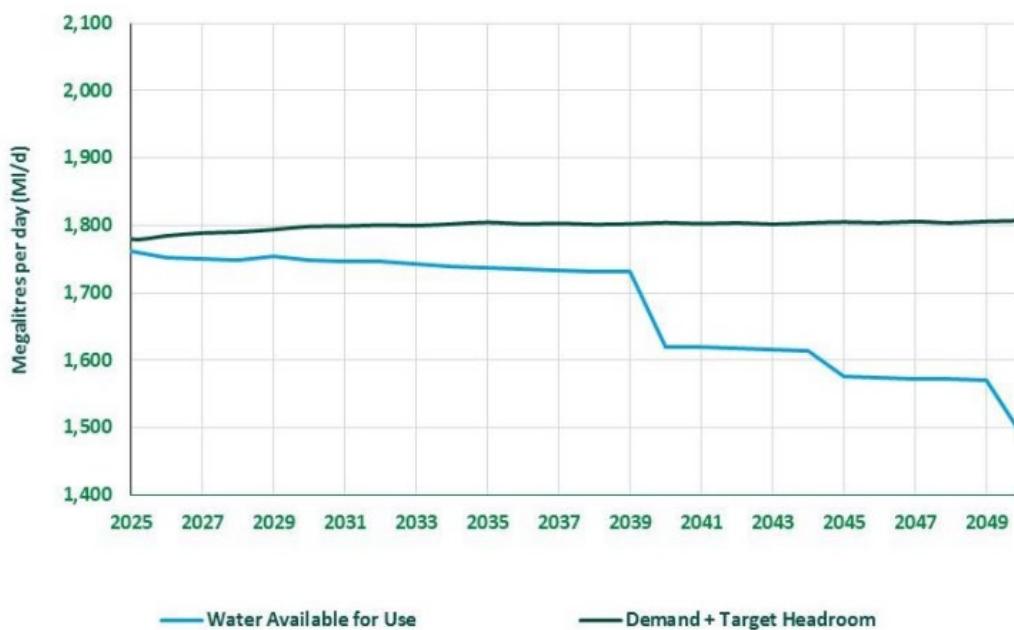
Table 14 Summary of baseline dry year annual average supply-demand balance by resource zone¹

Dry Year Annual Average Supply-Demand Balance (ML/d) for year:

Resource Zone	2025/26	2030/31	2035/36	2040/41	2045/46	2049/50
Strategic	-52.6	-48.5	-63.9	-180.1	-226.3	-314.

¹ [Water Resource Management Plan 2024 Main Report 2023 \(page 57\)](#)

Figure 22 Strategic Resource Zone – Dry Year Annual Average Supply-Demand Balance²



The baseline supply-demand balance shown in Table 14 and Figure 22 of WRMP24 confirms that without any interventions, the SRZ faces a deficit such that available supplies are insufficient to meet demand plus target headroom from 2025 onwards.

The supply-demand balance deficit is not a longer term problem. It is an immediate problem, which needs to be addressed through a range of interventions now. Without interventions, which include a reduction in leakage and the construction of new dwellings to the tighter standard for water efficiency, the supply-demand balance deficit will worsen and the pressures on the environment will increase.

Based on our commitments to reduce demand for water, to support water resources resilience and reduce our impact on the environment, WRMP24 requests that all local authorities in our supply area adopt the optional minimum building standard of 110 litres of water used per person per day in all new build dwellings. This is similarly stated in the Water Resources West Regional Plan 2025.

Importantly, these interventions will increase resilience to climate change, reduce pressure to find new sources of water supply and reduce pressure on the environment. Changes to the flow and level of our water bodies are a water management issue and a key issue to consider in how we respond to the supply and demand deficit. In this context, it is relevant to note that the North West River Basin Management Plan identifies a high percentage of water bodies as not achieving good ecological status or potential.

On the basis of the above, U UW considers there to be compelling evidence to justify the implementation of the tighter optional water efficiency standard now.

Water Ready A report to inform HM Government's road map for water efficient new homes

The optional standard is currently set at 110 litres per head per day (l/h/d). Importantly Table 3 of this document (see above link) confirms that the optional standard for water efficiency can be implemented at no extra cost. As such, there should be no concerns about the impact on viability as a result of implementing the optional standard for water efficiency.

In the context of this evidence, it is critical that the new local plan implements a water efficiency policy to ensure that the proposed growth is water efficient. UUW strongly believes that it would be illogical to allow the construction of a large amount of new dwellings every year without applying the tighter standard for water efficiency as soon as possible. This is a critical component of the response to the climate emergency. Importantly, application of this approach has the added economic and societal benefit by reducing customer bills.

Our recommended policy wording, which can be implemented as a new policy is set out below.

Recommended Policy

All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.

All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM 'Excellent' standard.