

Transition Town Letchworth Submission Relating to Matter 27 – the optional national technical standards for water efficiency and the nationally described internal space standards for dwellings

27.1 Through Policies SP9 and D1, the Local Plan seeks to require adherence to the Government’s optional national technical standards for water efficiency and the nationally described internal space standards for dwellings. As you know, for such policies to be sound, they must be supported by clear evidence of need and evidence that viability has been considered. In relation to both:

- a) Is the evidence of need adequate/sufficiently robust?
- b) Has viability been properly considered?

Water Efficiency Target

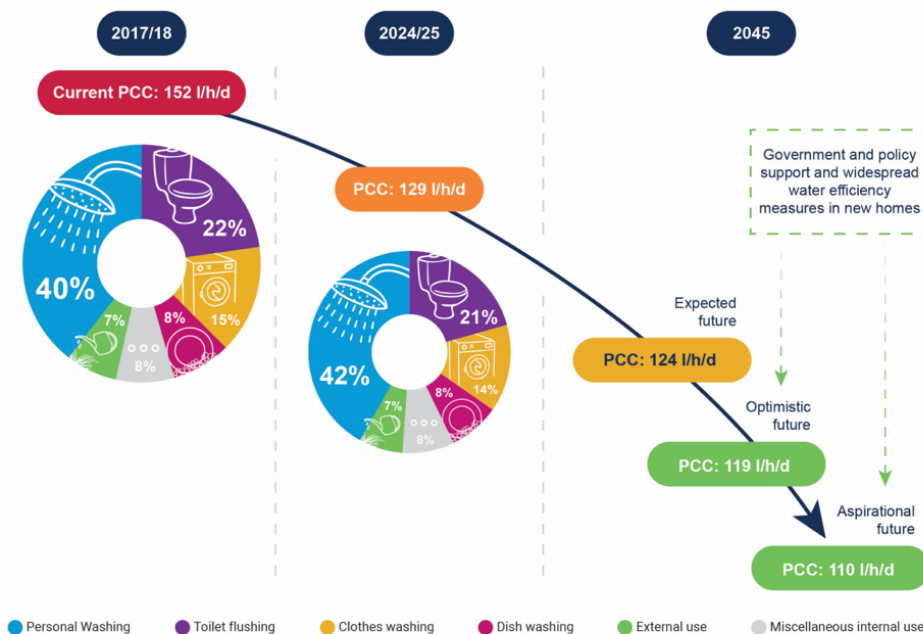
Transition Town Letchworth (TTL) supports NHDC in requiring developers to meet the optional technical standards for water efficiency. TTL have had various communications with the water efficiency team at Affinity Water, the company who supply water to North Hertfordshire, and have discussed water use targets for the area. In an emailed response to a question about whether Affinity Water might follow Southern Water with their Target 100 campaign they advised TTL that:

“We are aiming to support our customers to get down to 129 litre per person per day by 2025 and will be doing a lot to drive down demand. We are currently undertaking development of My Account, our online platform for customers which will display water use per day. This will be available for all metered customers around mid-year. We will then look to how we can put this on our paper bills, so that people are more informed with how much water they are using. It’s great that you are encouraging cubs to think about getting down to 100 litres, we have a long-term ambition to get this to 110 l/p/d.”

Source: email from waterefficiency@affinitywater.co.uk dated 18 March 2019

PCC Forecast

Reducing use per person in the average home



The percentage figures are breakdown of typical water use for metered customers only and includes 80% of properties metered by 2025.

PCC = per capita consumption (the amount of water used per person per day)

L/H/D = Liters per head per day

PCC Diagram Source: Figure 33: Summary of our demand management strategy impacts, Draft Final Water Resources Management Plan 2020-2080, Affinity Water, June 2019

Affinity Water's Draft Final Water Resources Management Plan (June 2019) includes the aim of supporting residents to lower their water use, with a long term target of achieving 110 l/p/d Per Capita Consumption (PCC). The plan states "our best value plan for the Central region is an adaptive Plan delivering a "twin-track approach" that combines ambitious demand management activities with the appropriate and timely development of supply-side schemes in order to address the supply-demand deficit that we face." One of the demand-side activities in the plan is "Promoting of voluntary building controls to deliver water efficient new homes and supporting water-efficient or water-neutral developments through liaison with local planning authorities and developers."

With current water consumption averaging 152 l/p/d for Affinity Water customers, it will be really important that customers moving into newly built homes are assisted to operate with a much lower PCC if Affinity Waters targets are to be met. Given that 110 l/p/d is the optional national target for water efficiency for new homes and this aligns with the long term target from Affinity Water (a target that will need to be met by existing and new home owners) it would be inappropriate to build homes that only aspire to help people achieve the 125 l/p/d target.

Around 60% of North Herts water comes from underground aquifers and around 40% from river abstraction. A significant proportion is imported from other water agencies and Affinity Water can theoretically demand water from its neighbours. Affinity Water planning up to 2080¹ excludes any significant new 'capture and storage' projects.

Affinity Water faces the following challenges in supplying water to North Hertfordshire:

- a) The increasing population.
- b) Winter rainfall (when most water is collected) is reducing due to climate change.
- c) Regulations are reducing the volume of water that can be abstracted from aquifers.
- d) Transport costs from other agencies are increasing.

The underground aquifers feed the local chalk streams. Over-extraction of water by Affinity Water is already drying up these chalk streams and more housing would only exacerbate this problem. The RevIvel Association is a local group who are working to get action plans in place to challenge the crisis facing the river Ivel. The river Ivel, located to the north of Letchworth, runs through Baldock, Stotfold, Arlesey and Henlow. In November 2019 the group identified ² that "The Ivel is one of only 225 chalk rivers worldwide - 80 per cent of which are in England. These chalk rivers rely on mineral-rich, pure clean water to survive. The current water levels are catastrophic. There has been no flow above Radwell for the last 14 months. The river is dry."

When a chalk watercourse is drained continuously, a succession of marshland and dry-land species take over. If flow is then resumed, the stream may not return unaided to its pre-dryout state of biodiversity. Even if a programme of restoration is applied, the stream may take many years to recover.³

1 www.affinitywater.co.uk/corporate/plans/water-resources-plan

2 <https://www.thecomet.net/news/river-ivel-action-group-s-environmental-campaign-1-6357640>

3 England, Judy, Dobbek, Lukasz, Leeming, Brishan, Gurnell, Angela, Wharton, Geraldene; 2019/02/07 '[Restoration of a chalk stream using wood: assessment of habitat improvements using the Modular River Survey: Restoration of a chalk stream using wood](#)' in Water and Environment Journal, 10.1111/wej.12466

Abstract The installation of large wood and sediment berms to narrow the overwide channel of the River Bulbourne, Hertfordshire, aimed to restore geomorphological processes, improve channel habitat diversity and increase the amenity value of the park in which the river is located. The Modular River Survey provides a framework and suite of tools for river managers and volunteers to monitor and assess restoration activities. Applying this technique to the River Bulbourne before and after restoration

Affinity Water's Draft Final Water Resources Management Plan (June 2019) has accepted the following levels of risk:

- Temporary Use Bans, 1 in 10 years
- Drought Order Restrictions, 1 in 40 years
- Drought Permits (allows over extraction causing environmental damage), 1 in >40 years
- Emergency Drought Order (recognised as causing serious environmental damage), 1 in 200 years.

If new homes are not required to achieve the optional water efficiency standard this will impact on Affinity Waters plan for water supply, increasing the risk of over- extraction and the associated biodiversity damage.

In summary, the importance of new homes being designed to minimise water use, with the optional national water efficiency target of 110 l/p/d, should remain in the Local Plan and be reinforced by making a clear statement that:

“Sixty percent of North Herts water comes from underground aquifers which are also the water source for local chalk streams. Over-extraction from aquifers by water suppliers is already drying up local chalk streams. Once chalk streams have dried up it takes years for the local biodiversity to recover and often this will only occur if there is a supporting habitat restoration programme. One of the measures that has been identified for reducing the risk of over-extraction of aquifers is the delivery of water efficient new homes.”

Technology including low flow showers and low water use toilets along with other water saving solutions are now readily available. Hence, there should be no viability issues related to opting for the optional water efficiency target. Additionally, given water use is metered designing homes for water efficiency will help residents through lower water bills.

Nationally Adopted Internal Space Standards: Storage Areas for Waste Containers for Flats

Transition Town Letchworth support the inclusion of national space standards for dwellings. In particular, we believe that lack of space in flats is an issue that has to be addressed to achieve progress towards a circular economy of materials. The Technical Housing Standards 2015 specify standard Gross Internal Areas per dwelling without reference to, or explicit allowance for, the storage space needed for waste containers. Whilst a Council cannot produce its own space standards that are different to the national standards, it may promote approaches for adaptation to climate change in its design policies. For instance, the Council could promote measures in the Local Plan for ensuring that collections of household and similar waste are organised to meet the higher levels of the Waste Hierarchy.

Evidence of local need

demonstrated that the works increased physical habitat and vegetation complexity. The restored section was narrowed, substrate composition changed and the range of in-stream vegetation morphotypes increased. The initial slight improvement in riparian habitat complexity immediately following the restoration is expected to increase further over time as the riparian vegetation develops and the restored section of channel matures. A public perception and recreational use survey reviewed how visitor experience and use of the park changed following restoration.

Flats, especially in multi-storey residential buildings, are notable for problems with waste collection and for difficulties in achieving high rates of recycling. In 2007, the Herts Waste Partnership (HWP) set a target recycling rate of 50% for 2012. Whilst that was attained ahead of schedule, the increase in recycling rate for the county has slowed as the most readily available means of making further increases have been used up. In North Herts District the rate was 56.8% in 2018/19. The County Council anticipates that the Government's Resource and Waste Strategy will adopt new and much more challenging targets.⁴

That leaves multi-storey residences as a significant obstacle to further progress in complying with future targets. Whilst both low and high rise ("tower block") buildings occur elsewhere in Hertfordshire, the multi-storey buildings for accommodation in North Hertfordshire are lower, typically of 3-6 storeys. Many residents in such accommodation may want to recycle but lack convenient facilities with which to do so.⁵

That is where the need arises for new developments and major refits to be equipped to enable residents to sort materials for recycling, thus leaving little to be collected as residual waste. NHDC has specified detailed guidance for this purpose to which the Local Plan could refer (see Appendix A). Whilst that guidance is due for review and should in our view be replaced by firm, up-to-date requirements, a brief statement such as we are proposing below could cover present and forthcoming measures. It would be compatible with HCC's Waste Core Strategy (2012) and (as far as is known) with its successor, the forthcoming Waste Management Strategy for Hertfordshire (2020).

Proposed addition to the Local Plan

We propose a requirement that all developments and major refits of blocks of flats should include designated, accessible storage areas for containers for recyclable and residual kinds of waste materials in accordance with Approved Document H (see Appendix B). The requirement should be specified by consultation via the Hertfordshire Waste Partnership so as to ensure that schemes of provision are consistent with the forthcoming Environment Bill's "new direction for resources and waste management" and with current trends and forthcoming guidance and best practice across Hertfordshire including any review of provision for residential multi-storey buildings.

In chapter 9, Design, of the draft Local Plan, after paragraph 9.7, we suggest that the following specific requirement for secure storage of solid waste materials be added⁶:

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- 4 **Herts CC: Community Safety & Waste Management Cabinet Panel**, 10 February 2020, Waste Management Performance Report, para. 4.11: "...it is likely that the Resources and Waste Strategy will adopt new targets to increase the level of recycling, composting and re-use set at 65% of municipal waste. Hertfordshire County Council's current recycling rate for municipal waste is 50.7%" (<https://tinyurl.com/rmvfjuj>)
- 5 **23. NHDC Cabinet 30 July 2019, Report of the Service Director - Place: Waste Collection from Multi Occupancy Properties (MOP)** (<https://tinyurl.com/wayfjhg>)
8.3...The MOP waste stream is a particularly hard one to manage with the majority of residents using communal bins. This can discourage residents to recycle responsibly.
..... If residual waste bins are full residents can leave excess waste around bins which is unsightly and can cause further issues around public health i.e. smells and vermin.
8.4...51% of MOP are considered not in a position to go fortnightly services due to lack of existing storage capacity.
- 6 This suggestion is mainly adapted from a part of **Folkestone & Hythe District Council's Local Plan: (current, undated)**, Appendix 3: Minimum acceptable standards for properties undergoing conversion to self-contained flats

Solid Waste storage

Adequate and proper provision must be made for storage of solid waste materials at blocks of flats in accordance with approved document H. (A.D H4 Solid Waste Storage) which, provides detailed guidance relating to storage capacity per dwelling/flat and also for design and siting of containers and the Council's guidance on Waste and Recycling Provision – Flats. An individual covered, lockable enclosure must be provided for each unit of accommodation, constructed of materials which can be properly cleansed and maintained. It should be located for ease of use and operation and to avoid any potential nuisance. Any extension, conversion or modification to an existing building should proportionately adjust the waste storage facilities.

Formal basis

As regards storage for flat dwellers on solid waste, the draft Local Plan does not explicitly reflect the UK Government's legislation, statutory measures and guidance from the Climate Change Act 2008 onwards, in respect of adapting to climate change and of complying with the Waste Hierarchy: the National Planning Policy Framework 2012, the Waste Management Plan for England 2013, the National Planning Policy for Waste 2014 and the Resources and Waste Strategy 2018.

Viability

Similar requirements for storage space have been applied by other planning authorities in consultation with their waste collection authorities and partnerships. Such requirements may be specified in a Supplementary Planning Document (SPD) and cited in the Local Plan. However there is no "one size for all"; rather, whilst aided by the drive for consistency of waste collections, the manner of provision has to be designed on a case-by-case basis to suit the development site, the nature of the accommodation and anticipated national and local practices for waste collection and processing.

"Refuse storage

Adequate and proper provision must be made for refuse storage in accordance with approved document H.(A.D H4 Solid Waste Storage) provides detailed guidance relating to storage capacity per dwelling/flat and also design and siting of containers. An individual covered lockable enclosure must be provided for each unit of accommodation, constructed of materials which can be properly cleansed and maintained. It should be strategically located for ease of use and operation and to avoid potential nuisance arising from smell, noise, infestation by vermin and attack from other animals etc."

<https://www.folkestone-hythe.gov.uk/webapp/local-plan/written/cpt18.php>

Appendix A: NHDC: Waste and recycling provision - Flats (*current, undated*):

"Flats usually require communal provision for all residents to use. This provision needs to be convenient and accessible both for the resident (within 30m) and for collection staff (within 10m). Collections will be changing for flats and therefore the list below gives details of the capacity requirements per person as a minimum for new developments. As a guide for one and two bedroom flats an assumption of two residents per flat should be made. For three bedroom flats assume three residents per flat as a minimum.

- Mixed dry recycling: 45 litres per person (fortnightly collection)
- Paper: 10 litres per person (fortnightly collection)
- Food waste: 20 litres per person (if flats have private gardens additional capacity will be required) (fortnightly collection)
- Residual waste: 40 litres per person (fortnightly collection)

In addition, the internal kitchen storage arrangements for waste are often inadequate. Separate storage should be provided inside each dwelling for each of the four waste streams with a minimum total internal storage capacity of 30 litres.

...

Where bin cupboards are used they should have protection strips in doorways and on walls to prevent damage, with a mechanism for holding doors open.

Any bin storage area should have enough space to enable each bin to be moved independently, i.e. without moving other bins. Bins should be stored to enable users to stand in front of the opening edge of the bin to lift the lid.

Doors to bin stores should be sufficient in widths to allow the movement of bins at their widest and prevent entrapment of limbs. This is likely to be a minimum of 20cm in addition to the widest bin contained in the bin store.

Storage areas should be conveniently located with easy access for residents - residents should not have to take their waste and recycling more than 30 metres to a bin storage area, or take their waste receptacles more than 25 metres to a collection point, (usually kerbside) in accordance with Building Regulations Approved Document H Guidance."

<https://www.north-herts.gov.uk/home/planning/waste-and-recycling-provision#Flats>

Appendix B: Statutory guidance on Drainage and Waste Disposal, 2015 edition: Approved Document H; The Building Regulations in England for foul water drainage and disposal:

Page 53: H6, Solid Waste Storage:

- (1) Adequate provision shall be made for storage of solid waste.
- (2) Adequate means of access shall be provided:
 - (a) for people in the building to the place of storage; and
 - (b) from the place of storage to a collection point ...

Page 54, Guidance:

Domestic developments - Capacity

1.1 For domestic developments space should be provided for storage of containers for separated waste (i.e. waste which can be recycled is stored separately from waste which cannot) with a combined capacity of 0.25m³ per dwelling or such other capacity as may be agreed with the waste collection authority. Where collections are less frequent than once per week, this allowance should be increased accordingly.

1.2 Low rise domestic developments – In low rise domestic developments (houses, bungalows and flats up to 4th floor) any dwelling should have, or have access to, a location where at least two movable individual or communal waste containers, meeting the requirements of the waste collection authority, can be stored.

1.3 Where separate storage areas are provided for each dwelling, an area of 1.2m x 1.2m should be sufficient to provide for storage of waste containers and provide space for access.

1.4 Where communal storage areas are provided space requirements should be determined in consultation with the waste collection authority.

1.5 High rise domestic developments – in multi-storey domestic developments dwellings up to the 4th floor may each have their own waste container or may share a waste container.

1.6 Dwellings above the 4th storey may share a single waste container for non-recyclable waste fed by chute, with separate storage for any waste which can be recycled. Alternatively, storage compounds or rooms should be provided. In such a case a satisfactory management arrangement for conveying refuse to the storage area should be assured.

1.7 The use of 'Residents Only' recycling centres (areas where residents may bring their recyclable waste for storage in large containers, e.g. bottle banks) in large blocks has been found to be effective in some areas.

Page 55: Appendix H6 - A, Relevant waste collection legislation:

Collection of household waste

A.1 Under Section 45 (Collection of controlled waste) of the Environmental Protection Act 1990, local authorities have a general duty to collect household waste within their area without charge.

A.2 Under Section 46 (Receptacles for household waste) of the Environmental Protection Act 1990, the local authority may require:

- a. waste of certain types to be stored separately so that it can be recycled;
- b. occupiers of dwellings to provide containers of a specified type for storage of waste;
- c. additional containers to be provided for separate storage of recyclable waste;
- d. locations where containers should be placed for emptying.

<https://tinyurl.com/ruat88u>