



Strategic Planning and Design
Enfield Council
FREEPOST
NW5036
EN1 3BR

27th August 2021

Dear Sir/Madam,

Thank you for the consultation notification regarding the Regulation 18 Draft Enfield Local Plan 2019-2039.

We have considered the consultation documents and the files you shared with us, please see our comments set out below.

There are three key factors we analyse when reviewing the proposed sites and number of homes. Firstly, if any of the sites for allocation 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 is sufficient to meet additional demand requirements for new developments.

Groundwater Source Protection Zones (SPZs)

We have reviewed the sites for potential allocation and you should be aware that many of the proposed developments sites are located within Environment Agency defined groundwater Source Protection Zones (SPZs).

The SPZs affected by the proposed site allocations fall outside of Affinity Water's service area and sit within Thames Water's supply area. Therefore, it is advised that Thames Water are consulted throughout the Local Plan process.

Existing water network

We have reviewed the sites for potential allocation and can confirm that most are outside of Affinity Water's supply region. Those that are located within our region do not intersect any of our existing infrastructure.

Please be aware that 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.

Current infrastructure

We have reviewed the information for domestic property and employment sites within the Affinity Water area as set out in the plan.

As previously stated, most of the proposed development areas sit within Thames Water's supply area and therefore they are best placed to make comments in those instances. The potential allocations within Affinity Water's supply area are generally relatively small in scale, and we do not foresee any significant issues in relation to water supply.

The above comments are valid based upon the growth data you have shared with us. However, it is necessary to highlight that nearby Local Authorities are projecting a significant increase in demand which can influence the nature and pace of planned infrastructure required in the area for future growth. For this reason, we strongly encourage early engagement on plans for future development, to ensure we can effectively plan for the impacts of the associated increase in demand.

All projections of infrastructure capacity are subject to developers and customers reducing their Per Capita Consumption (PCC) in accordance with our Water Resources Management Plan (WRMP) through the development of water-efficient buildings; and encouraging customers to save water (please see Water Resources section below).

Further information:

The water industry is regulated in five-year periods and our business planning reflects this. Affinity Water's 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.

Our current plan considers reinforcements to be installed to meet the demands growth, and the new infrastructure will be available for the initial housing planning that may be used to absorb some initial phases of total growth. In addition, each developer will contribute to the required reinforcements depending on the relative impact on the network.

We continually monitor the performance of our distribution system and puts 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.

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>

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 should be a priority for local authorities and developers. It is fundamental to considering water sustainability in the long-term for all new homes, as this will potentially impact economic and population growth and the local environment.

The draft Enfield Local Plan does not specifically mention water efficiency for new developments and there does not appear to be a policy relating to water efficiency or usage targets associated with this. 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 would also expect the following to be associated with new developments:

- It is fundamental that developers use water efficient fittings and fixtures in all new developments (households and non-households)
- The means by which monitoring of the implementation of the water consumption target in new homes should also be determined by the local authority and should be implemented on all new developments.
- We highly encourage local authorities and developers to consider the wider water environment. Therefore, for any new development we would expect consideration of the incorporation of water efficient features such as rainwater harvesting, rainwater storage tanks, water butts and green roofs to be given as appropriate.
- Increased water efficiency for all new developments helps to ensure water resources can be managed effectively across the region. As set out in our WRMP this will help us to safeguard resilience of supply whilst minimising impacts on the environment. Lower water usage also reduces water and energy bills for residents.

We expect new homes to comply with Part G of the Building Regulations to help manage domestic customer consumption. However, the company remains concerned that whilst new homes meet the conditions set out by Part G, residents could remove the water efficient devices after they have moved in, increasing their household demand for water. 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.

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.

Please do not hesitate to contact us if we can provide any further information or if you require any further clarification. We would be happy to meet with yourselves to discuss any of the comments raised above, or to discuss any further information you may require from us.

