

United Utilities Water Limited - Response to Proposed Main Modifications to Hyndburn Local Plan (1 May 2026)

Main Modification MM44 – Policy SP13, Criterion h (Water Efficiency)

Introduction

United Utilities Water Limited (U UW) welcomes the opportunity to comment on the Hyndburn Local Plan Main Modifications. However, U UW objects to Main Modification MM44, which relates to water efficiency on the basis that it does not align with National Planning Practice Guidance (NPPG) and does not accurately reflect or incorporate the position, or recommended policy wording based on the evidence submitted by U UW to the Examination (Matter 11, Issue 11, Question 6). For ease of reference MM44 is set out below.

MM44	Page 65, Policy SP13 Climate Change and Sustainable development, part h.	G. h. Improving water efficiency standards by incorporating measures to recycle and conserve water resources via on-site attenuation;	Amended for effectiveness.
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U UW Position on Water Efficiency Standards

U UW reiterates its clear position that all new residential development in Hyndburn should be required to meet the tighter Building Regulations water efficiency standard of 110 litres per person per day (l/p/d), as set out in Requirement G2 of the Building Regulations (or any future equivalent).

Evidence Justifying the Tighter Standard

The water stress classification was last updated in 2021 and is therefore relatively out of date when compared with more up-to-date evidence in recently published water resource management plans. The purpose of the water stress classification is to inform the implementation of compulsory metering. Although the North West is not classified as ‘*seriously water stressed*’ in the 2021 water stress classification, the NPPG is clear that the water stress classification is not the only primary evidence that can be used to justify the implementation of the tighter water efficiency standard. NPPG confirms that the tighter 110 l/p/d standard may be justified through Water Resource Management Plans (WRMPs), River Basin Management Plans (RBMPs), and other locally specific evidence.

Hyndburn lies within United Utilities’ Strategic Resource Zone, serving approximately 7 million people. United Utilities’ Final Water Resource Management Plan 2024 (WRMP24) identifies a baseline supply–demand deficit in the Strategic Resource Zone from 2025

onwards, rising significantly over the plan period without intervention. Demand reduction, including new homes built to the 110 l/p/d standard, is a core component of addressing this deficit.

The Water Resources West Regional Plan and associated evidence also explicitly support the adoption of the tighter 110 l/p/d standard across the Water Resources West Region, which includes the area served by U UW, including in areas not designated as seriously water stressed.

The North West River Basin Management Plan identifies a high proportion of water bodies failing to achieve good ecological status, with water demand management identified as a key mitigation measure.

As such, there is significant primary evidence to justify the implementation of the tighter water efficiency standard in Building Regulations through policy in the new local plan.

Viability and Deliverability

Research supported by Government and prepared in liaison with a range of development representatives confirms that there is clear [evidence](#) that the tighter 110 l/p/d standard can be delivered at no additional cost and therefore does not impact development viability or housing supply. The tighter water efficiency standard also delivers wider economic, social and environmental benefits, including reduced household bills and lower carbon emissions.

Concerns with Main Modification MM44

MM44, as currently drafted lacks clarity by failing to explicitly require the tighter Building Regulations water efficiency standard. It does not reflect the substantial, up-to-date evidence submitted by U UW in support of the tighter water efficiency standard. The absence of a clear requirement to implement the tighter water efficiency standard dilutes the effectiveness of Policy SP13 in contributing to climate resilience, environmental protection and sustainable development. U UW considers criterion h of Policy SP13 to be ineffective and unsound when assessed against national policy and the evidence that was submitted by U UW to the Examination.

Requested Modification

U UW respectfully requests that MM44 is amended to explicitly require the tighter water efficiency standard. U UW's recommended wording remains as previously submitted:

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

UUW also supports a complementary requirement for major non-residential development to incorporate water efficiency measures consistent with BREEAM '*Excellent*' standards.

Conclusion

For the reasons set out above, UUW maintains that application of the tighter 110 l/p/d water efficiency standard is justified by primary evidence, viable, consistent with national policy and essential to ensuring the long-term resilience of water resources serving Hyndburn and the wider North West. UUW therefore strongly urges that MM44 is revised to clearly and unambiguously secure this standard within Policy SP13.