

4 July 2012



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Please ask for **Mr P Sansby**
Our reference **PNS/KL/WCC**
Your reference

Dear Rosemary

WINCHESTER DISTRICT LOCAL PLAN

With reference to Winchester City Council's letter about the National Planning Policy Framework we would like to make the following comments. The Framework does not make any detailed references to water resource planning or water efficiency. The only sections that may be relevant to the Core Strategy are in paragraphs 19, 23, 31 and 70.

Core Planning Principles

Paragraph 19 refers to "taking into account local circumstances" and this applies to the water resources situation in Portsmouth. The Core Strategy needs to reflect Portsmouth Water's Water Resources Management Plan 2009.

Local Plans

Paragraph 23 refers to the provision of water supply infrastructure and climate change mitigation and adoption. The Water Resources Management Plan includes demand management and supply side solutions. The Core Strategy should not rely on high carbon measures, such as rainwater harvesting and greywater recycling, for water supply in Portsmouth Water's area of supply. High carbon use will contribute to global warming and sea level rise which is a critical issue for Portsmouth.

Infrastructure Requirements

Paragraph 31 refers to local authorities working with other "providers" to assess the quality and capacity of infrastructure. For water supply, Portsmouth Water have produced the Water Resources Management Plan 2009. Winchester City Council can use the demand forecasts that the Plan contains and should use equivalent standards for water efficiency in new build houses.

Planning Conditions and Obligations

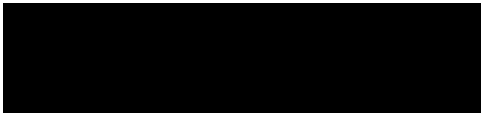
Paragraph 70 refers to authorities avoiding "unnecessary conditions or obligations particularly when this would undermine viability of development proposals". Portsmouth Water argued at the examination of the Portsmouth Plan that the policy for internal water use was too strict. The Inspector determined that implementation of Level 5 of the Code for Sustainable Homes should be delayed by two years. Portsmouth City Council has to "strengthen the associated evidence base" to show that Level 5 for water is necessary in Portsmouth Water's area of supply and is sustainable and viable.

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Conclusion

I understand that you will pass these comments on to the Planning Inspector. If the Inspector decides to examine the issue of water resources then we would be happy to present further information or to attend the examination in process.

Yours sincerely



Gareth Simmonds
Regulation Manager