

## Folkestone and Hythe District Core Strategy Review Examination Matters, Issues and Questions identified by the Inspectors

### Matter 11 – Other policies

#### Issue

Whether Policies CSD3, CSD4, CSD5 and SS5 are justified, effective and consistent with national policy.

#### Questions

##### *Policy CSD5*

- 1) Is Policy CSD5 justified and consistent with national policy? Is it sufficiently clear?

The policy is consistent and justified regarding water resources. The area is one of serious water stress and the higher standards of water efficiency are justified. In particular see Q2 below.

- 2) Is the requirement for the use of the optional higher water efficiency standard (110 litres per person per day) for residential development justified? What is the evidence in terms of the need for such a standard and the effect on viability?

110 litres per head per day is the optional higher standard of water efficiency specified in the Building Regulations. We believe it is appropriate to set this standard in all areas of serious water stress.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/244333/water-stressed-classification-2013.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf)

It has been demonstrated that it is achievable with only a very marginal increase in cost.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/353387/021c\\_Cost\\_Report\\_11th\\_Sept\\_2014\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/353387/021c_Cost_Report_11th_Sept_2014_FINAL.pdf)

- 3) Is the requirement for non-residential development to achieve the BREEAM 'outstanding' standard for water efficiency justified?

There is no equivalent standard for non-residential developments but we encourage local authorities in water stressed areas to set standards according to BREEAM categories. Ordinarily we would suggest the "Excellent" standard, but in view of the ambitions for Otterpool in terms of water efficiency and neutrality over a wider area, we would support "Outstanding" for larger developments

- 4) Does the policy provide an adequate and sufficiently clear approach to sustainable drainage and flood risk which is consistent with national policy?

Policy CSD5 can be considered supplementary to policy SS3 in terms of flood risk. SS3 gives clear direction in terms of the sequential approach to flood risk and the need to follow the recommendations in the Strategic Flood Risk Assessment and National Policy. We therefore do not feel that it is necessary to include additional detail CSD5 other than to reiterate the requirement of all developments not to increase flood risk elsewhere.