



## NOTE

### OTTERPOOL PARK GARDEN TOWN SETTLEMENT

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**Folkestone and Hythe Core Strategy Review**

**Matter 11 Statement**

**Examination in Public**

**July 2020**

**Quod**

**On behalf of Otterpool Park LLP**

## NOTE continued

### Folkestone and Hythe Core Strategy Review Examination in Public

Hearing Statement of behalf of Otterpool Park LLP

#### Matter 11: Other Policies

##### Policy CSD5

**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?**

1. Limiting potable water consumption to 110 l/p/d will help to address achieving the nutrient neutrality precautionary principle that Natural England have recently stipulated as a new requirement for all new development on the Stour Catchment to protect the Stodmarsh Lake European Designated Site further downstream.
2. Natural England's Advice document to Local Planning Authorities on Nutrient Neutrality for Development in the Stour Valley Catchment in relation to Stodmarsh Designated Sites(December 2019) also includes a model condition, which requires all new dwellings to meet the optional 110 l/p/d optional water efficiency target.
3. It also helps addressing the general concerns of the local community and key stakeholders on limited existing groundwater water resources and provide resilience to mitigate climate change impacts.

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

1. The Building Research Establishment's Environmental Assessment Method (BREEAM) is a commonly accepted sustainability assessment methodology and benchmarking scheme for buildings.
2. In order to provide a benchmarking scheme and enable comparability between projects, BREEAM has a number of sustainability categories (including energy, water and ecology). Each category has credits available based on achieving set criteria. The final BREEAM performance rating is determined by the sum of the weighted category scores.
3. This leads to an overall BREEAM rating from Pass, Good, Very Good, Excellent to Outstanding. Alongside the overall rating, there are also mandatory elements within each category which must also meet the standard achieved by the building as a whole.
4. The BREEAM rating enables stakeholders to compare an individual building's performance with other BREEAM rated buildings. In this respect each BREEAM rating level broadly represents performance equivalent to:
  - Outstanding: Less than top 1% of UK new non-domestic buildings (innovator)
  - Excellent: Top 10% of UK new non-domestic buildings (best practice)

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- Very Good: Top 25% of UK new non-domestic buildings (advanced good practice)
- Good: Top 50% of UK new non-domestic buildings (intermediate good practice)
- Pass: Top 75% of UK new non-domestic buildings (standard good practice)

### *Relevant Draft Policy Requirements*

5. The Folkestone & Hythe District Council Core Strategy Review 2019 - Submission Draft:

**Policy SS8: New Garden Settlement - Sustainability and Healthy New Town Principles.  
Policies for a New Sustainable Town**

1 (C) For non-residential development, development shall achieve BREEAM 'Outstanding' standard, including addressing maximum water efficiencies under the mandatory water credits.

**Policy CSD5: Water and Coastal Environmental Management**

(a) For non-residential development, the development achieves BREEAM 'outstanding' standard addressing maximum water efficiencies under the mandatory water credits, where technically feasible and viable.

### *Policy Compliance*

6. There are 4 sub-categories within the overall Water category in BREEAM New Construction 2018, which is the current and the newest BREEAM scheme for non-residential buildings:
- WAT 01: Water consumption (5 credits in total)
  - WAT 02: Water Monitoring (1 credit)
  - WAT 03: Water leak detection (2 credits in total)
  - WAT 04: Water Efficient Equipment (1 credit)
7. Of these, 'Outstanding' standards are applicable to WAT 01 and WAT 02 credits.
8. Given the location and future climate change impacts, the overall objectives and urgent priorities for Otterpool Park include reducing potable water demand through efficient use of water and wastewater, which will ensure protecting and conserving of water supplies and resources serving the site (Section 4 Sustainability Approaches, Section 4.4 Water, Otterpool Sustainability Statement). To meet the required Per Capita Consumption (PCC) target of 90 l/d/p as per the FHDC Core Strategy Policy SS8, the design also aims to utilise recycled water treated at a new (Otterpool) or upgraded (Sellindge) waste water treatment works for water flushing and irrigation activities.
9. A minimum of two credits under WAT 01 are mandatory to meet BREEAM Outstanding standard. Based on BREEAM 2018 water consumption calculation, non-residential properties have been recommended to specify following fixtures and fittings so as to achieve higher number of credits under WAT 01 category:
- 2.6/ 4.0 l dual flush toilets;
  - Dry urinal systems;

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- Kitchen taps limited to 5 l/minute;
  - Bathroom taps limited to 3 l/minute;
  - 3.5 l/minute showers.
10. Additionally, commercial and domestic sized white goods (such as washing machines and dishwashers) and waste disposal units specified will need to have low water consumption. However, this will largely be dependent on the building owner or user.
  11. Water fittings and water consuming goods with the above specifications will likely achieve one and more credits under WAT 01 depending on the water needs of a building.
  12. Meeting Criteria 1 under WAT 02 (specifying a water meter on all mains water supply to a building, including where water is supplied via a borehole or other private source) is mandatory to achieve BREEAM Outstanding rating, which is considered as best practice, and therefore, will be incorporated within the design.
  13. To achieve the credit under WAT 02, water-consuming plants or building areas consuming 10% or more of the building's total water demand will need to be fitted with sub-meters with pulsed or other open protocol communication outputs, which can be connected to an appropriate utility monitoring and management system (for e.g. BMS). Additionally, if the non-residential buildings have swimming pools, or large water tanks and aquariums, these will need to be fitted with separate sub-meters. These requirements are also considered as best practice and are recommended to be incorporated within all non-residential building designs, which will secure the 'Outstanding' standard as well as a credit under WAT 02.
  14. Otterpool Park has an ambition for designing buildings with low water consumption, and meet the requirements for WAT 01 and WAT 02 to assist in meeting BREEAM Outstanding standards. It should, however, be noted that different non-residential buildings will have different water demands, and where necessary, higher water consumption devices or equipment may be required for some non-residential properties. Given the nature of BREEAM schemes, it is also likely that the Outstanding requirements for the BREEAM scheme at the time of the assessment of the buildings may be expected to be more onerous than BREEAM 2018 requirements. It is, therefore, considered that achieving an Excellent standard for Water category (1 credit under WAT 01 and Criterion 1 under WAT 02) is likely to be feasible in this instance.

### *Conclusions*

15. BREEAM Outstanding is designed to demonstrate that a new building is within around the top 1% of all new buildings. The proposed Development is committed to long term ambition toward developing buildings with low water consumption, and the commitments set out in the Sustainability Strategy demonstrate that the Outstanding standards for the Water category may be achievable for non-residential buildings, depending on its water demands, and certain factors like specification of low water use white goods, which are dependent of the building owner or user.
16. It is recommended that the BREEAM target for Water category is set at Excellent standard with an ambition to achieve Outstanding standard, which will still demonstrate that the building is within the top 10 percent of new buildings.