

Independent Examination of the Thanet Local Plan

Inspectors' Matters, Issues and Questions for Examination

Environment Agency Comments

Matter 9 – Meeting Housing Needs (Policies SP19-SP20, QD04-QD05, HO20-HO26)

Issue 3 – Housing Standards – Policies QD04 and QD05

Q1. The PPG6 states that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. In doing so local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans. Has this been carried out? What is the justification for the standards in Policies QD04 and QD05?

Regarding the higher water efficiency standard, we strongly encourage this, and the evidence that is usually presented starts with the Environment Agency Report <https://www.gov.uk/government/publications/water-stressed-areas-2013-classification>. This report is referenced in Para 13.25 of the draft plan, preceding the relevant Policy statement. Additional evidence can sometimes be provided where available, e.g. where a water cycle study has been done.

Our Chief Executive, Sir James Bevan has today emphasised the need to reduce water consumption, suggesting a reduction to 100 litres per person per day, the target set by Waterwise, and 10 litres less than the higher standard in the Building Regulations.

As we stated in our response, we would additionally recommend a high standard to be set as a requirement for water efficiency in non-domestic buildings, at least in larger developments, using BREEAM standards.

We have no comments on the space standards, or those in Policy QD05 concerning Accessible and Adaptable Accommodation.