

GLOUCESTER CITY PLAN EXAMINATION
MATTER 3 – PLANNING & FLOOD RISK & WATER MANAGEMENT

Inspector’s issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF, which should be read in conjunction with our representations to the pre submission City Plan consultation dated 14th February 2020. This representation answers specific questions as set out in the Inspector’s Matters, Issues & Questions document.

Whether the policies relating to flood risk and wider water management issues are justified, effective and consistent with the JCS and national policy?

34. Is the application of the Optional Technical Housing Standard for water efficiency justified and consistent with national policy in relation to need and viability? Should Policy G7 reference a more holistic approach to implementing measures to achieve required levels of water efficiency?

The Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. Under Policy G7, development proposals must demonstrate that the estimated consumption of wholesome water per dwellings should not exceed 110 litres of water per person per day.

As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). Therefore, a policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the NPPG. The NPPG states that where there is a “*clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day*” (ID : 56-014-20150327). The NPPG also states the “*it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement*” (ID : 56-015-20150327). The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas.

The only justification for adopting the optional standard is provided within the supporting text of the Gloucester City Plan (para 3.7.27), which states that Gloucester is located within Severn Trent's Strategic Grid Area identified in the 2019 Water Resources Management Plan as "highly vulnerable". The Council's argument is that this statement together with the benefits of water efficiency measures justify the proposed policy requirement.

No further evidence is provided to support the proposed policy requirement. The Council's Infrastructure Delivery Plan (IDP) includes a summary of the Severn Trent 2020 - 2025 Business Plan on addressing matters relating to Water Supply (para 8.1.7). This summary includes no reference to the imposition of the optional water efficiency standard. It is noted that the Severn Trent Water Resources Management Plan identifies numerous measures to address the demand for water in the area but the optional water efficiency standard in new housing is excluded. Indeed, the mandatory Building Regulation standard of 125 litres of per person per day represents an improvement on the existing consumption rates across Severn Water's administrative area, where consumption rates in 2013/14 were 129 litres per person per day and in 2017/18 were 133 litres per person per day in 2017/18.

Any costs for the optional water efficiency standard are excluded from The Council's Viability Assessments (VIA001 & VIA002). The Council consider any additional costs to be de-minimus however, the overriding purpose of viability assessment is to account for the cumulative impact of all costs associated with affordable housing provision, CIL, S106 contributions and compliance with policy requirements (see HBF detailed comments in Matter 10 Hearing Statement).

The requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability testing. Policy G7 and its supporting text should be deleted. If deleted proposed Main Modification PM074 set out in Schedule of Changes pre-submission Gloucester City Plan Addendum November 2020 (CD010a) is unnecessary.