

26 June 2020

Our ref: Melton 7

Dear Sir/Madam

Somerby Neighbourhood Plan Regulation 16 Consultation

Thank you for the opportunity to comment on your Somerby Neighbourhood Plan consultation.

Severn Trent are generally supportive of the Somerby Neighbourhood Plan, however there are a few areas of the plan that we feel would benefit from alteration or additions to deliver against the Neighbourhood plan objectives and wider environmental goals. These comments have been detailed below as responses to the relevant section of the Neighbourhood Plan to aid with interpretation.

Section 3.2.2 Character and Design Objectives

Severn Trent note that OBJ 10 relates to the use of technology and design to reduce energy consumption. We are supportive of this approach but would advise that an equivalent objective is set up from a water efficiency or surface water management perspective, potentially objectives with words to the effect of:

OBJ xx: To ensure that development make use of new technologies and are designed so that they are water efficient, and where possible incorporate innovative water efficiency and water re-use measures.

OBJ xx: To ensure that and development follows the good surface water management principles, incorporating Sustainable Drainage Systems (SuDS) and the Drainage Hierarchy principles alongside rainwater harvesting technology where appropriate.

Policy HR4: Windfall Sites

Severn Trent would highlight that it is important for all development including Windfall sites to consider how surface water is managed this is particularly applicable within rural areas where there are more opportunities to manage surface water sustainably. We would therefore recommend that Policy HR4 includes a bullet point to highlight the need for the sustainable management of surface water and consideration of the Drainage Hierarchy (Planning Practice Guidance Paragraph 80) and implementation of SuDS where appropriate. Further guidance on wording in relation to the drainage hierarchy and SuDS are provided in our comments to policy CD1.

Policy CD1: Building Design Principles

Severn Trent are generally supportive of the approach to include a policy to direct design principles to be included such that good design guidance is followed and development is in keeping with the surrounding settlement.

Bullet point b highlights the need to ensure that boundary features are retained, however it does not mention ditches or watercourses. Severn Trent would advise that this bullet point is amended to

incorporate a reference to watercourses and ditches, as they both for part of the local setting and provide essential surface water management functions, that prevent increase in flood risk and the sustainable discharge of surface water.

The retention of natural watercourses is a vital part of the water cycle and supports Severn Trent to deliver our sewerage and water provision duties. There is a need to maintain healthy river flows, by allowing land to naturally drain into watercourses, this allows water to be abstracted at permitted locations where environmental harm will not be caused. In addition, the ability to discharge surface water to a watercourse reduces the impact that new development has on the sewerage system and will reduce additional impacts from climate change in the future.

An example bullet point could contain wording to the effect of:

x) watercourses (including ditches) will be retained as open features and where possible, not contained within private land, to ensure that development does not result in an increase in flood risk or prevent the long-term maintenance of these hydrological features.

Bullet point h references consideration of energy provision and sustainable drainage system but does not mention water efficiency. As a result of climate change and increasing demand for clean water, it is essential that we manage water in a sustainable way. As such we would recommend that either bullet point h references water efficient design, or an additional bullet point for water efficiency is incorporated. This approach is supported by Building Regulation part G through the implementation of the optional water efficiency target. The wording of an additional bullet point could contain wording to the effect of:

“All development should be design in accordance with the optional water efficiency target of 110 l/p/d, as per Building Regulations Part G”.

Reasons for supporting the inclusion of this wording within policies include:

National Planning Policy Framework (July 2018) Paragraph 149 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

The optional efficiency target can only be required of a development where a planning condition is implemented. However, outlining this expectation within the Neighbourhood Plan will help to ensure that developers account for this design requirement from the outset, and support the implementation of a condition to ensure appropriate water efficiency is achieved. Alongside water efficiency we would also recommend that a statement is included to ensure that developers consider opportunities to incorporate water re-use within developments.

Whilst we support the use of SuDS and the management of surface water, it is also critical that surface water is returned to the natural water cycle in the most sustainable way. As such the implementation of the Drainage Hierarchy (Practice Planning Guidance Paragraph 80) is equally

important. We would therefore recommend that the drainage hierarchy is mentioned within bullet point h, some example wording is provided below for reference.

All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible.

Reasons for including this wording within your policies include:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

“Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

- 1. into the ground (infiltration);*
- 2. to a surface water body;*
- 3. to a surface water sewer, highway drain, or another drainage system;*
- 4. to a combined sewer.”*

Further example wording to support good Quality SuDS design, may include statement such as:

All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are put in place unless demonstrated to be inappropriate.

All schemes for the inclusions of SuDS should demonstrate they have considered all four aspects of good SuDS design, Quantity, Quality, Amenity and Biodiversity, and the SuDS and development will fit into the existing landscape.

The completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure that the SuDS are maintained in perpetuity.

Where possible, all non-major development should look to incorporate these same SuDS principles into their designs.

The supporting text for the policy should also include:

Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

Further guidance on SuDS should be sort from the LLFA.

Policy ENV1: Protection of Local Green Spaces, Policy ENV2: Protection of sites and features of Environmental Significance, Policy ENV3: Important Open Spaces and Policy ENV4: Local Non-Designated Heritage Assets

Severn Trent recognise the importance of site that fall into the classifications covered by policies ENV1, ENV2, ENV3 and ENV4. However we would note that in some cases these areas represent the only viable locations to enable specific projects such as flood alleviation schemes. It is therefore important that these policies are written such to protect these assets, and permit schemes that could provide wider benefits such as flood alleviation schemes. To facilitate this we would recommend that the policies include wording to the effect of:

Development of flood resilience schemes within [local green spaces/Site of environmental Significance/Important open space/local Non-Designate Heritage asset] will be supported provided the schemes do not adversely impact the primary function of the [local green spaces/Site of environmental Significance/Important open space/local Non-Designate Heritage asset].

Policy ENV 10: Biodiversity and Wildlife Corridors

Severn Trent are generally supportive of this policy and would like to highlight the need to consider blue green corridors through development as these design considerations can result in multi-functional spaces that provides wider benefits to both biodiversity, SuDS and wildlife. To assist in the consideration of this type of thinking it is recommended that Policy ENV 10 incorporates wording to the effect of:

Development should where possible, create and enhance blue green corridors to protect watercourses, and their associated habitats from harm.

The supporting text for this policy should also highlight that:

The incorporation of Sustainable Drainage Systems (SuDS) into these blue green corridors can help to improve biodiversity and amenity, assisting with the delivery of the wider benefits of utilising SuDS.

Policy ENV 11: Trees, Hedgerows and Green Verges

Severn Trent are supportive of Policy ENV 11, however we would highlight the need for watercourses and ditches to be protected from development such that the water is allowed to be conveyed safely through the existing settlements and new development sites without increasing flood risk. We would therefore advise that watercourses are retained as open features, within public open spaces such that they can be accessed for maintenance when required. It is recommended that an additional bullet point is included with wording to the effect of:

x) watercourses (including ditches) will be retained as open features and not contained within private land where possible, to ensure that development does not result in an increase in flood risk or prevent the long-term maintenance of these hydrological features.

Policy ENV 16: Flood Risk

Severn Trent is generally supportive of policy ENV 16 however as detailed within our responses to some of the other policies within the Somerby Neighbourhood Plan. It important that the drainage hierarchy is considered to ensure that surface water is direct towards the most appropriate outfall and unnecessary strain is not placed on the sewerage system. Example wording in relation to a bullet point regarding the Drainage Hierarchy is provided under our response to policy CD 1.

Community proposal 7: Flood Risk

Whilst Severn Trent do not have any objection to the principles outlined within this proposal it is important to understand that SuDS are not necessarily a method for disposing of Surface water, with the exception of infiltration SuDS, an outfall is still required to facilitate the disposal of surface water. Therefore, the Drainage Hierarchy is vitally important in the sustainable management of surface water.

Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

For your information we have set out some general guidelines that may be useful to you.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site-specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue, we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

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