

28 February 2020

Our ref: Newbold Verdon 3

Dear Sir/Madam

## Newbold Verdon Neighbourhood Plan Submission Version

Thank you for the opportunity to comment on your consultation, Severn Trent are generally supportive of the principles within the Newbold Verdon Neighbourhood Plan. I note our response is very different to the response provided to the pre-submission version, our process for reviewing Neighbourhood Plans has changed.

### Policy H3: Priority to be given to Brownfield Sites Development

Whilst Severn Trent do not oppose the re-development of brownfield sites, we would encourage that any policy to promote their development ensure that they are designed to accommodate current best practice, including separate surface water and foul sewers. Utilising the Drainage Hierarchy to identify a suitable outfall, rather than utilising existing connections to combined sewers.

It is also important that when re-developing brownfield sites, that any contamination of the land is understood to ensure that pollutants are not mobilised into the water system.

### Policy H6: Design

Severn Trent understand and support the approach covered by bullet point d to preserve existing trees, hedges and wildlife habitats, however we would also note that watercourses form a vital part of the natural ecosystem and water cycle. It is therefore felt that the protection of watercourses should also be highlighted, and that these watercourses are retained as open features within public open space.

Severn Trent is supportive of bullet point f in particular the reference to water efficiency, however we would recommend that this approach is expanded to highlight the need to meet the optional water efficiency Target within Building Regulations Part G. the addition of the following statement could assist with achieving this goal:

**“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 option 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.

Severn Trent support bullet point g which details the need to incorporate SuDS to manage surface water flows from new development. We would however also highlight the importance of the Drainage Hierarchy (Planning Practice Guidance Paragraph 80) when looking to develop a resilient and robust system to manage surface water. This approach promoted the use of alternate outfalls for surface water with sewers being a last resort. 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.”*

### **Policy ENV1: Protection of Local Green Space**

Severn Trent understand the need for Local Green Space and the need for it to be protected, however local green spaces can provide suitable locations for schemes like flood alleviation to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chose, the flood alleviation can result in additional benefits to the local green space in the form of Biodiversity or Amenity improvements. We would therefore recommend that the following point is added to Policy ENV1

***Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.***

## **Policy ENV2: Protection of site and features of Environmental Significance**

Whilst Severn Trent understand that the constraints around sites of Environmental Significance are likely to be more constrained than those of Local Green Spaces, there are still likely to be schemes that could be delivered without damaging the environmental significance of a site, and even provided benefits. As such policy should be written to ensure that blockers to schemes that could result in net benefits should be supported. We would therefore recommend that the following statement is added to Policy ENV2

***Development of flood resilience schemes within sites of environmental significance will be supported provided the schemes do not adversely impact the environmental constraints of the sites. .***

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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