

29 April 2022

Our ref: Burton and Dalby 2

Dear Sir/Madam

Burton and Dalby Neighbourhood Plan – Pre-Submission Draft and Design Code

Thank you for the opportunity to comment on your consultation, Severn Trent are generally supportive of the principles outlined within the Burton and Dalby Neighbourhood Plan and Design Code, there are a few areas we believe could be enhanced to help support the Neighbourhood Plan objectives and deliver wider benefits.

Neighbourhood Plan

Policy B&D9: Local Green Space

Severn Trent understand the need for Important Open Space and the need for it to be protected, however open spaces can provide suitable locations for schemes such as flood alleviation to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes 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 B&D9 to support the delivery of flood alleviation projects where required within green spaces..

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 B&D12: Design

Severn Trent previously recommend that this policy highlights key design considerations about the performance of development sites, in such that they are built to manage surface water sustainably and utilise resources sustainably during use, It is noted that an additional Policy B&D25: water Management that covers these points. Severn Trent support the use of SuDS, the principles of the Drainage hierarchy, water efficiency and recommend that the optional tighter water efficiency target of 110 l/hd/d is utilised. We also support the protection of existing drainage systems such that sustainable discharges can be utilised / maintained, and that surface water is no inadvertently directed into the sewerage system.

Policy B&D16: Housing in Great Dalby

Severn Trent are not currently aware of any specific issues that would result the proposed development at the Halford not being deliverable. It is noted that the site is located Adjacent to a surface water sewer and that no surface water would be anticipated to enter the foul sewers.

Section 11. Flooding

Severn Trent are supportive of the principles outlined within section 11 regarding flooding, in particular the implementation of SuDS and the need to find an alternative to directing surface water to networks of sewers and pipes.

Design Codes

DC.05.2 Biodiversity and Wildlife

Severn Trent would recommend that design code CD.05.2 also highlights the need to protect watercourses to ensure that development doesn't increase flood risk through the removal of natural or manmade drainage systems.

DC.09 Extensions and alterations

Extensions and alterations should ensure that they consider the principles of the drainage hierarchy and ensure that surface water is discharged to a sustainable outfall rather than connected to the foul sewers.

DC.12 Sustainable Design

Much the same as with our comments to policy B&D 12 we would recommend that development should be designed to be water efficient as water efficient technology is often energy efficient due to the reduced need to heat water. The inclusion of the optional Water efficiency target from building regulations part G requiring 110l/hd/day (litres per household per day), supports recommendations made within the river Humber River Basin Management Plan.

We would also recommend that SuDS and the drainage hierarchy are promoted.

DC.12.3 Sustainable Drainage Systems (SuDS)

Severn Trent are supportive of the promotion of SuDS and the need for SuDS to be designed to meet the 4 pillars of SuDS, Water Quantity, Water Quality, Biodiversity and Amenity. We would also highlight the need for the drainage hierarchy to be detailed in DC.12.3 to ensure that surface water is discharged to a sustainable outfall rather than sewers.

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 per minute 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 would also encourage the use of rainwater harvesting on larger developments, either residential or commercial. This helps to reduce the demand on public supply, associated carbon impact of supply and also reduced site run off and sewer flows. Rainwater Harvesting as a development rather than on a property by property basis is more cost efficient and can produce greater benefits.

Both the [River Severn River Basin Management Plan](#) (Page 52) and the [Humber River Basin Management Plan](#) (page 46) recommend that Local Plan set out policies requiring homes to meet the tighter water efficiency standard of 110 litres per person per day *as described in Part G of Schedule 1 to the Building Regulations 2010*. As such Severn Trent's recommendation is consistent with wider objectives within our water supply regions.

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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