

**01 November 2022**

Our ref: Asfordby 2

Dear Sir/Madam,

## **Asfordby Neighbourhood Plan Regulation 16**

Thank you for the opportunity to comment on your consultation, we have some specific comments to make on your plan. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

### **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 on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.

### **Policy A3: River Wreake Strategic River Corridor**

Severn Trent are supportive of the principle outlined within Policy A3 regarding the protection of the River Wreake, Severn Trent are working with the Environment agency across our entire region to comply with WFD, and have an agreed programme of improvements with the Environment Agency to ensure that we meet our fair share of Water Quality improvements within Severn Trent's service area.

### **Policy A4: Local Green Spaces**

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 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 A4 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 A5: Water Management**

Severn Trent are supportive of the need for development to undertake a flood risk assessment, to ensure that the proposed development will not be adversely effected by flooding. It is also recommended that where possible Foul sewers are not located beneath exceedance flow routes or within flood zones to prevent the ingress of excess surface water or river water into the foul sewers that could then result in sewer flooding on the downstream system.

## **Policy A6: Water Quality and Resources**

Severn Trent are supportive of the principle that development must not adversely impact on water quality or the availability of water. It is important that water is protected and managed sustainably within developments through water efficiency and where possible the incorporation of rainwater harvesting.

## **Policy A7: Biodiversity**

Severn Trent are supportive of the principle to enhance biodiversity, especially where biodiversity gains are provided as part of multifunctional SuDS features that also provide flood alleviation, or water quality improvements. It is important that this approach also protects existing watercourses retaining them as Open features such that they can intercept and safely convey surface water flows through the landscape, providing viable sustainable surface water outfalls preventing the need for surface water connections to the sewerage system.

## **Policy A9: Design**

Whilst it is noted that whilst design parameters are detailed within other policies, Severn Trent would 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. To this effect we would recommend that Policy A9 highlights the need for development to incorporate:

1. Sustainable Drainage systems (SuDS)
2. Implement the principles of the Drainage Hierarchy
3. Incorporate water efficient design and technology

## **Drainage Hierarchy**

The drainage hierarchy outlined the principles of where surface water should be discharged, the hierarchy is outlined within Planning Practice Guidance paragraph 80 (Reference ID: 7-080-20150323). Severn Trent request evidence that the drainage hierarchy has been followed by developers in our conversations, however by raising the expectation at the Neighbourhood Plan stage it consideration can be incorporated into the initial a site designs resulting it better continuity of surface water through development.

To aid in the interpretation of this request we would recommend that the following wording is incorporated into Policy A8:

**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.**

## **SuDS (Sustainable Drainage Systems)**

Severn Trent note that Planning Policy already requires major development to incorporate SuDS through the written Ministerial Statement for Sustainable Drainage (HCWS 161) and NPPF. However current policy is very flexible on how SuDS can be incorporated into development, by incorporating appropriate references to SuDS in Policy A8, the need for developers to deliver high quality SuDS can be secured. Current Industry Best Practice for SuDS (The SuDS Manual CIRIA C753) highlights the need to consider SuDS from the outset of the design process and not to fit SuDS to the development site post layout. To aid in the delivery of this recommendation we would recommend wording to the effect of:

**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.*

We would also note that as the Lead Local Flood Authority (LLFA) are the statutory consultee for the planning process in relation to surface water management that they should also be consulted on any wording regarding SuDS.

## **Water Efficiency**

Water efficient design and technology is important for ensuring the sustainability of the water supply system for the future, both supporting existing customers and future development. NPPF supports the delivery of sustainable development and the Humber River Basin Management Plan promotes the use of the tighter Water Efficiency Target within Building Regulations Part G. We would recommend that this detailed with Policy A8 so that developers are aware of what is expected of them from the outset of the design process.

To aid with the implementation of the recommendation we have provided some example wording below:

**All development should demonstrate that they are water efficiency, where possible incorporating innovative water efficiency and water re-use measures, demonstrating that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day.**

## **Retention of existing drainage networks (including the Protection of Watercourses)**

New Development has the potential to interrupt both manmade and natural drainage systems that perform a vital function in preventing flooding and conveying water safely through the landscape, the damage of; or removal of part of this network could result in increased flood risk on the development site or impact on the effectual drainage of other land.

In the cases of ditches or watercourses the removal or culverting of these features can also impact on biodiversity by reducing the access to water for wildlife and result in loss of habitats. Severn Trent therefore recommend that the drainage systems of a site are understood before any site layout is constructed such that they can be incorporated into the layout of the development in the most effective and natural way, some example working is provide below to assist with implementation of the recommendation.

**No development shall prevent the continuation of existing natural or manmade drainage features, where watercourses or dry ditches are present within a development site, these should be retained and where possible enhanced.**

**Access to drainage features for maintenance should be retained and ownership of land clearly defined as part of the overall site maintenance plan.**

**Prior to the alteration of any alignment an assessment will be required to ensure that all connections into the watercourse are retained and that exceedance flows are not then directed away from the watercourse channel towards properties.**

The supporting text for the policy should also include:

*The removal of watercourses and ditches from development sites, presents a risk for future growth and development in such that links to the natural water cycle can be removed resulting in a potential increase of on site and off site flood risk. The removal of these features would result in an increased need to connect surface water to the sewerage network, as identified above this is against the drainage hierarchy outline in the Planning Practice Guidance*

### **ASF1: Land east of Station Lane and south of Klondyke Way, Asfordby Village (100dw)**

Severn Trent are usually consulted on Planning Applications, as such any site level comments / condition requests will have been made on the individual Application as such no further comments are necessary at this level.

### **ASF2: Fields south of Bypass and north of Regency Road (55dw)**

Severn Trent are usually consulted on Planning Applications, as such any site level comments / condition requests will have been made on the individual Application as such no further comments are necessary at this level.

### **ASF3: Land off Hoby Road, Asfordby (70dw)**

Severn Trent are usually consulted on Planning Applications, as such any site level comments / condition requests will have been made on the individual Application as such no further comments are necessary at this level.

### **ASFH1 (land off Houghton Close & Glebe Road) and ASFH2 (Land of Stanton Road)**

Severn Trent are usually consulted on Planning Applications, as such any site level comments / condition requests will have been made on the individual Application as such no further comments are necessary at this level.

However, if an additional 90 Dwellings were to be delivered there is the potential need for capacity improvements, we would therefore recommend that developers consult with Severn Trent early

within their site design process to understand their impact on the sewerage network and any subsequent next steps.

### **Brownfield Land**

Severn Trent not that Paragraph 6.17 highlights the approach to develop Brownfield Sites, Severn Trent would recommend that brownfield development is direct to ensure that surface water is directed towards a sustainable outfall and kept separate from the foul flows, even where sites were previously combined, the benefits of attenuating or redirecting surface water of flood risk could be substantial and is consistent with the principles outlined within the Written Ministerial Statement for Sustainable Drainage (HCWS161).

### **Policy A11: Whitlock Garages**

Scale of development is not anticipated to result in any significant impact, provides surface water is directed to a sustainable outfall.

### **Policy A12: Asfordby Storage and Haulage Depot, Main Street Asfordby**

Severn Trent would not anticipate any significant impacts as a result of this re-development, especially where surface water flows could be attenuated and preferably discharged to a sustainable outfall.

### **Policy A20: Asfordby Business Park and Old Dalby Test Track**

Severn Trent are aware of downstream constraints, as such a development of this scale would be anticipated to result in adverse impacts on the sewerage system. It is therefore important that developers liaise with Severn Trent to align any required Capacity Improvements with development profiles.

### **Policy A21: Holwell Works**

Severn Trent would not anticipate any significant impacts as a result of this re-development, especially where surface water flows could be attenuated and preferably discharged to a sustainable outfall.

### **Policy A22: Holwell Business Park**

Severn Trent would not anticipate any significant impacts as a result of this re-development, especially where surface water flows could be attenuated and preferably discharged to a sustainable outfall.

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

### **Wastewater Strategy**

We have a duty to provide capacity for new development in the sewerage network and at our Wastewater Treatment Works (WwTW) and to ensure that we protect the environment. On a company level we are producing a Drainage and Wastewater Management Plan covering the next 25 years, which assesses the future pressures on our catchments including the impacts of climate change, new development growth and impermeable area creep. This plan will support future

investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks.

Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.

## Surface Water

Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy:

### Drainage Hierarchy Policy

*New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.*

Supporting Text:

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.”

## Sustainable Drainage Systems (SuDS)

Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity. We therefore recommend that the following policy wording is included within your plan regarding SuDS:

### Sustainable Drainage Systems (SuDS) Policy

*All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.*

*All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.*

*Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.*

Supporting Text:

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.

## **Blue Green Infrastructure**

We are supportive of the principles of blue green infrastructure and plans that aim to improve biodiversity across our area. Looking after water means looking after nature and the environment too. As a water company we have launched a Great Big Nature Boost Campaign which aims to revive 12,000 acres of land, plant 1.3 million trees and restore 2,000km of rivers across our region by 2027. We also have ambitious plans to revive peat bogs and moorland, to plant wildflower meadows working with the RSPB, National Trust, Moors for the Future Partnership, the Rivers Trust, National Forest and regional Wildlife Trusts and conservation groups.

We want to encourage new development to continue this theme, enhancing biodiversity and ecology links through new development so there is appropriate space for water. To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:

### **Blue and Green Infrastructure Policy**

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

Supporting Text:

The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States:

“Planning policies and Decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”

### **Green Open Spaces Policy**

*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.*

Supporting Text:

We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes 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 through biodiversity and amenity benefits.

### **Water Quality and Resources**

Good quality watercourses and groundwater is vital for the provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that the water quality of our supplies are not impacted by our operations or those of others. Any new developments need to ensure that the Environment Agency’s Source Protection Zones (SPZ) and Safeguarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.

Every five years we produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of our customers whilst protecting our environment over the next 25 years. We use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. We are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand.

New developments have a role to play in protecting water resources, we encourage you to include the following policies:

### **Protection of Water Resources Policy**

*New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.*

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 163 states:



“Planning policies and decisions should contribute to and enhance the natural and local environment... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as river basin management plans;”

### **Water Efficiency Policy**

We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard:

*New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.*

Supporting Text:

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.”

This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed – [link](#).

We recommend that all new developments 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.

## Water Supply

For the majority of new developments, we do not anticipate issues connecting new development, particularly within urban areas of our water supply network. 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. If significant development in rural areas is planned, this is more likely to have an impact and require network reinforcements to accommodate greater demands.

## Developer Enquiries

When there is more detail available on site-specific developments, we encourage developers to get in contact with Severn Trent at an early stage in planning to ensure that there is sufficient time for a development site to be assessed and if network reinforcements are required that there is time to develop an appropriate scheme to address the issues. We therefore encourage developers to contact us, details of how to submit a Developer Enquiry can be found here -

<https://www.stwater.co.uk/building-and-developing/new-site-developments/developer-enquiries/>

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

Yours Sincerely,

Chris Bramley

Strategic Catchment Planner

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