

18 December 2020

Our ref: Bottesford 2

Dear Sir/Madam

Bottesford Parish Neighbourhood Plan Consultation, Reg 16 Submission Version

Thank you for the opportunity to comment on your consultation regarding the Pre-submission version of the Bottesford Parish Neighbourhood Plan. Severn Trent are generally supportive of the principles outlined within the plan.

Paragraph 27

Severn Trent note the references in bullet points, f, g & h regarding managing water appropriately to mitigate flood risk, create biodiversity benefits and enhance the local area. Severn Trent are supportive of this approach and would encourage that surface water is treated as a resource and returned to the natural water cycle in a safe way as close to source as possible.

Neighbourhood Planning Policy 1: Sustainable Development and Village Envelopes

Severn Trent note that bullet points d and e highlight the need to conserve and enhance biodiversity and maximise water efficiency. We are supportive of the inclusion of these principles within the policy.

Table 7 extract from the Bottesford Parish Design guide

Severn Trent are supportive of the approach that development develop a coordinated SuDS strategy to manage surface water, integrating trees and SuDS into development such that they enhance and benefit the residents of the development. We are also keen that Utility services are protected from trees and building and that these risks are picked up as part of the initial layout assessment preventing problems down the line.

We are also supportive of the utilisation of Root barriers in appropriate locations to protect utilities from root damage.

Dry Ditches Paragraph 117

Severn Trent support the approach to protect natural land drainage systems including dry ditches as they form a vital part in the upper reaches of the natural water system, conveying water to an appropriate watercourse. They are needed to manage land drainage which cannot be connected into the sewerage system. They also provide vital outfalls for surface water to support sustainable development.

Neighbourhood Plan Policy 3 Protecting and improving Biodiversity

Severn Trent are generally supportive of this policy, in particular bullet points 1b and 1f as detailed above, the implementation of systems to safely manage and convey surface water back into the natural water system using resilient systems such as SuDS that area designed to account for the impacts of climate change and can provide wider benefits such as Amenity and Biodiversity. Our response to paragraph 117 demonstrates our support for the protection of watercourses and dry ditches as open features, where possible these should be retained within open spaces to ensure access for maintenance can be obtained.

We however recommend that the Drainage Hierarchy (Planning Practice Guidance paragraph 80) is also included to highlight the need to discharge surface water to the natural watercourse system instead of sewers.

Neighbourhood Plan Policy 4 Designation of Local Green Spaces

Severn Trent understand the need for Local Green Spaces and the need for them to be protected., however Local Green Spaces can provide sustainable locations for schemes like flood alleviation to be delivered without adversely impacting on the primary function of the Local Green Spaces. If the correct scheme is chosen, the flood alleviation project can result in additional benefits for the Local Green Space in the form of Biodiversity or amenity improvements. We therefore recommend that the following point is added to Policy 4.

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

Paragraph 164

Severn Trent are supportive of the approach to deliver SuDS as part of Multifunctional Spaces, recognising that some land uses can accommodate occasional flooding and protect properties from intense storms, whilst supporting enhance biodiversity and amenity within development sites.

Paragraph 165

Severn Trent strongly support the approach to drain development in accordance with the drainage hierarchy, as such we are fully supportive of this statement within the Neighbourhood Plan.

Paragraph 173

Severn Trent support the principle to install Retro fits SuDS to try and mitigate the impacts of flooding and climate change, especially where this approach would remove surface water from the sewerage networks.

Neighbourhood Plan Policy 6 Reducing the Risk of Flooding

Severn Trent are supportive of the principles outlined within Policy 6, particularly the need to consider the natural drainage pattern of the land, reducing the risk of overland flows creating flooding or draining into the sewerage system. We are also supportive of the approach to include SuDS and follow the Sequential approach to ensure that vulnerable development is not located in the areas at risk of flooding.

Whilst we note that the Environment Agency are a key stake holder in relation to flood risk, where sites are not located within flood zones 2 or 3, but are larger than 0.25 Ha and subsequently require a Flood Risk Assessment (FRA) as Part of Policy 6, would it be the Environment Agency or the Lead Local Flood Authority that would review the FRA?

As highlighted in bullet point 4b we would encourage developers to contact Severn Trent to understand what drainage capacity is available and if any improvements will be required, by undertaking this process early we can reduce the need to delay development to enable infrastructure to be upgraded.

Neighbourhood Plan Policy 8 Ensuring High Quality Design.

Severn Trent note that whilst this policy is looking to promote good design and incorporate sustainable development there is no reference to Water Efficient design. Severn Trent would promote the need to ensure that development is undertaken in a sustainable way to ensure that there is not excessive usage of resources such as water for consumption. To this effect we would recommend that high quality design incorporates Water efficiency design and technology.

To enable this to take place we would recommend that the optional efficiency standard within Building Regulations Part G is referenced. So example wording is provided below.

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

Water efficient design also provides energy efficiency benefits through a reduced need to treat water for consumption and then treat wastewater along with savings for managing water within the home.

Whilst the protection of watercourses (inc Dry Ditches) is mentioned elsewhere within the Neighbourhood Plan, it is felt that bullet point 1d should also include a reference to watercourses.

Neighbourhood Plan Policy 9 Renewable Energy and Low Carbon Technologies.

Severn Trent are supportive of the inclusion of the water efficiency target within Policy 9, to assist in making development more sustainable.

Neighbourhood Plan Policy 15 Development of BOT 11 Land to rear of Daybell’s farm and 18 Grantham Road

Severn Trent are aware of the allocation of BOT 11 within the Melton Local Plan. Development of this site will need to be undertaken carefully as there area known constraints on the sewerage system downstream of the development. It is therefore advised that developers contact Severn Trent early in the planning process to determine how and when development will occur and agree an appropriate connection details to mitigate the impact on the sewerage system or allow for any required capacity improvements to be completed if necessary.

Whilst the nearby sewers are combined sewers there are also surface water sewer in the Grantham Road and Belvoir Road. Severn Trent would highlight the need to follow the principles of the drainage hierarchy as such surface water should be assessed for a connection to these systems prior to considering a connection to the combined sewer network.

We are supportive of the inclusion of bullet point 4 which highlights the specific need for well-designed SuDS and water recharge (infiltration) to be considered at an early stage.

Neighbourhood Plan Policy 16 Development of BOT 2 Grantham Road

Severn Trent are aware of the allocation of BOT 2 within the Melton Local Plan. Development of this site will need to be undertaken carefully as there are known constraints on the sewerage system downstream of the development. It is therefore advised that developers contact Severn Trent early in the planning process to determine how and when development will occur and agree appropriate connection details to mitigate the impact on the sewerage system or allow for any required capacity improvements to be completed if necessary.

The watercourse (ditch) adjacent to Grantham Road must be retained and protected for any adverse impacts through development. This watercourse should be assessed for viability as a surface water outfall prior to any consideration of surface water flows being directed towards the sewerage networks.

Severn Trent are supportive of bullet point 2 in such that it highlights the need for well-designed SuDS and consideration of the principles of the Drainage Hierarchy.

Neighbourhood Plan Policy 17 Development of BOT 3 Rectory Farm

The Development site Rectory Farm is indicated to contain a Rising Main, As such early consultation will need to be held with Severn Trent to understand the impact that this will have in relation to layout and ensure that the existing asset is protected during and post construction.

The site is indicated to be intersected by the River Devon, therefore there should be no need for any surface water connections into the existing sewerage networks.

Early conversations with Severn Trent are recommended to ensure that the site connection point can be agreed and if any capacity improvements are required they can be aligned with the proposed build out schedule.

Severn Trent are supportive of bullet point 10 in such that it highlights the need for well-designed SuDS and consideration of the principles of the Drainage Hierarchy.

Neighbourhood Plan Policy 18 Development of East 1 Land East of Green Lane, Easthorpe

Severn Trent are aware of the allocation of East 1 within the Melton Local Plan. Development of this site will need to be undertaken carefully as there are known constraints on the sewerage system downstream of the development. It is therefore advised that developers contact Severn Trent early in the planning process to determine how and when development will occur and agree appropriate connection details to mitigate the impact on the sewerage system or allow for any required capacity improvements to be completed if necessary.

Severn Trent are supportive of bullet point 9 which highlights the need to discharge to the nearby watercourses where possible in accordance with the drainage hierarchy. We would also recommend that the policy details the need to incorporate SuDS principles, whilst the site is classified as minor development (<10 Dwellings) SuDS principles could still be used to provide benefits to the development site.

Neighbourhood Plan Policy 19 Development of East 2 Land West of Green Lane, Easthorpe

Severn Trent are aware of the allocation of East 2 within the Melton Local Plan. Development of this site will need to be undertaken carefully as there area known constraints on the sewerage system downstream of the development. It is therefore advised that developers contact Severn Trent early in the planning process to determine how and when development will occur and agree an appropriate connection details to mitigate the impact on the sewerage system or allow for any required capacity improvements to be completed if necessary.

Severn Trent are supportive of bullet point 8 which highlights the need to discharge to the nearby watercourses where possible in accordance with the drainage hierarchy. We would also recommend that the policy details the need to incorporate well designed SuDS within the development.

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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