From: Bramley, Chris <Chris.Bramley@severntrent.co.uk>
Sent: 16 August 2021 11:13
To: localplans@charnwood.gov.uk
Cc: Brown Geoff
Subject: RE: Charnwood Local Plan Pre-Submission Draft 2021-2037 Consultation
Attachments: Charnwood 6 Resp.pdf

ST Classification: OFFICIAL PERSONAL

Dear Sir / Madam

Thank you for giving Severn Trent an Opportunity to comment on the Pre-Submission Version of the Charnwood Local Plan, Please Find attached a copy of our response,

Geoff,
As mentioned in my previous email I would like to run through each of the sites again based on the GIS data as I noted that the Site references and the numbers of Dwellings for some of the sites have changed since our response to an earlier consultation, whilst I do not anticipate any major changes, It would be good to undertake this check. I have unfortunately not received the updated GIS polygons to check the datasets yet, but am happy to add any follow up comments if required at a later date once the checks have been undertaken.

Kind Regards

Chris Bramley
Strategic Catchment Planner (Leics & Notts)
Drainage and Wastewater Management Planning (DWMP)
Severn Trent Water Ltd, PO Box 51, Raynesway, Derby, DE21 7JA (sat nav post code is DE21 7BE)
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From: localplans@charnwood.gov.uk <localplans@charnwood.gov.uk>
Sent: 12 July 2021 06:37
To: Growth Development <GrowthDevelopment@severntrent.co.uk>
Subject: Charnwood Local Plan Pre-Submission Draft 2021-2037 Consultation

Dear Sir/Madam,

Charnwood Local Plan Pre-Submission Draft 2021-2037 Consultation

I am writing to inform you that Charnwood Borough Council has published the Charnwood Local Plan 2021-2037 for pre-submission consultation on Monday 12th July 2021. The Plan and the evidence which supports it are available to view on our website at:

https://www.charnwood.gov.uk/localplan

A copy of the Statement of Representations Procedure which sets out how to view the Local Plan, along with the other supporting documents, and how to make your representations can be found here.

Due to the coronavirus (Covid-19) restrictions all documentation is published online. If you are not able to access an electronic copy of the documents a hard copy can be made available to view, by appointment only, at the Main Reception of the Council Offices; to do so, please telephone 01509 634560.

The Local Plan is an important planning document that once adopted will set out the broad spatial planning policy framework and vision for Charnwood and provide a strategy for delivering growth in

the Borough, including strategic development sites, up to 2037. The Plan will be used to help shape major developments, deliver infrastructure, influence economic investment and make decisions on planning applications.

Following on from the earlier consultations, the Plan has been prepared having regard to the issues identified and the evidence gathered over the last few years. This pre-submission consultation concerns the 'soundness' of the plan, a test that a Planning Inspector will apply to it at an Examination in Public, following its submission to the Secretary of State. Representations to the Local Plan will be sent to the Secretary of State to be considered as part of the examination of the Local Plan, rather than the Council responding directly to comments received.

You are invited to make comments on the Pre-Submission Draft Local Plan, the Sustainability Appraisal and the other supporting evidence which accompany it. Comments must be made during the six-week consultation period which commences on **Monday 12th July 2021 and ends on Monday 23rd August 2021 at 5pm**. Representations received after this date will not be accepted.

We encourage all our consultees to make their comments using the online response form which can be found here during the consultation period.

We understand that some people may prefer to submit comments in a different format by email or by letter. If you are unable to make your comments using the online response form, please send your comments by email to localplans@charnwood.gov.uk or by letter to Local Plans Team, Charnwood Borough Council, Southfield Road, Loughborough LE11 2TX.

Please state your name and your contact details (including email address); and, if relevant, the organisation you represent and your position in that organisation.

If you are commenting on the Local Plan please state clearly which paragraph or policy you consider does not meet one or more of the tests of soundness, clearly stating the test of soundness, as set out in the National Planning Policy Framework. More information on the tests of soundness can be found in the FAQs on our website.

We will keep your details and what you say on our consultation database. Please note that your contact details will be protected under the Data Protection legislation but your name and any comments you make will be publicly viewable.

Any comments may be accompanied by a request to be notified at a specific address that the Local Plan has been submitted to the Secretary of State for independent examination, and of its future adoption. Please let us know if you require this service.

The Council is unable to hold the usual exhibitions on the Local Plan around the Borough due to the Covid-19 restrictions. However, officers will be holding two virtual presentations online on **Thursday 22nd July at 6-7pm** and on **Wednesday 4th August 6-7pm.** If you wish to learn more about the Local Plan and its preparation, please attend one of the presentations by registering on our website.

Please contact the Local Plans team at localplans@charnwood.gov.uk if you have any questions regarding this consultation.

Yours faithfully

Richard Bennett

Head of Planning and Regeneration

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16 August 2021
Our ref: Charnwood 6

Dear Sir/Madam

Charnwood Pre-Submission Draft Local Plan Consultation

Thank you for the opportunity to comment on your consultation, Severn Trent are Generally supportive of the principles outlined within the Plan.

We would support the approach outlined in Bullet point1 of the environmental objectives

"To promote the prudent use of resources and reduction of waste through patterns of development, design, transport measures, reducing the use of minerals, energy and water, minimising waste and encouraging recycling"

Severn Trent regularly run campaigns around the responsible use of water, which in the long term will be vital to ensuring that potable water can be provided to both the current, forecasted growth and future demands.

Policy DS3: Housing Allocations

I would not that Severn Trent have previously provided comments on specific Housing allocations, however as the number of dwellings proposed at some of these locations has changed, and references have changed, We would like to sense check our previous responses, we have requested the GIS Polygons for the site locations, but have not been able to undertake that assessment yet. Once we have received the polygons and undertaken revised assessments where necessary we will contact you further.

It is noted that several site specific polices include a statement to:

"Support measures to mitigate flood risk including contributions towards flood alleviation works in the wider catchment of the Wood Brook or other watercourses flow through or adjacent to Loughborough"

Severn Trent are generally supportive of this approach, and would recommend that any development within this catchment also looks to ensure that surface water is discharged to a sustainable outfall in line with the Drainage Hierarchy to prevent overloading of the sewers in storm events.

Paragraph 3.38

Severn Trent are supportive of the approach that Thurmaston SUE is developed sensitively in respect to the Melton and Barkby Brooks, ensuring that space is left for water and that surface water is managed sustainably such that it the drainage hierarchy is utilised to determine the outfall

as part of a site wide drainage strategy. This approach could also support the development of blue-green corridors that will support and enhance the biodiversity of the watercourses and the surrounding habitats.

Paragraph 3.39

Severn Trent are also supportive of the approach to consider climate resilient design within the SUE such that water efficiency and energy efficiency / technology is applied within the new developments reducing the impacts on our natural resources.

Policy LUA2: North East of Leicester Sustainable Urban Extension

Severn Trent are supportive of the inclusion of a statement within policy LUA2 requiring the Use of Appropriate SUDS systems, we would however recommend that the policy also highlights the drainage Hierarchy to ensure that sustainable outfalls for surface water are utilised over the use of Sewers. We also support the principles that development will protect and enhance water quality.

It is also recommended that the requirement for the optional Water Efficiency is detailed within the policy to ensure that development considers the sustainable use of resources.

Policy LUA3: North of Birstall Sustainable Urban Extension

Severn Trent are supportive of the inclusion of a statement within policy LUA3 requiring the use of appropriate SUDS systems, we would however recommend that the policy also highlights the drainage Hierarchy to ensure that sustainable outfalls for surface water are utilised over the use of Sewers. We also support the approach to ensure that the development incorporates multifunctional green space and corridors.

It is also recommended that the requirement for the optional Water Efficiency is detailed within the policy to ensure that development considers the sustainable use of resources.

Policy LUC1: Loughborough Urban Centre

Severn Trent are supportive of the principles to mitigate the impacts of flood risk, We would however recommend that the policy also promotes the use of SuDS, and the Drainage Hierarchy to mitigate the impacts of surface water within the urban environment, and promote the sustainable discharge of surface water back to the environment instead of discharging to the sewerage system.

It is also recommended that the requirement for the optional Water Efficiency is detailed within the policy to ensure that development considers the sustainable use of resources.

A Vision for the West of Loughborough Sustainable Urban Extension and Loughborough Science and Enterprise Park

Severn Trent are supportive of the principles to protect and enhance ecological sites and wildlife corridors including the Black Brook and the Burleigh Brook, the approach to create green corridors that allow biodiversity to navigate through the urban environment and make space for water could provide benefits and increase the viability for surface water management and SuDS to be delivered.

Whilst Severn Trent are supportive of the principles and changes that would impact on the ability for existing Wastewater Treatment Works (WwTW) to operate would be opposed unless they have been incorporated into our existing improvements programme that ensure Seven Trent deliver our fair share of watercourse improvements but are not required to meet targets that could not be delivered.

Policy LUC2: West of Loughborough Sustainable Urban Extension

Severn Trent are supportive of the inclusion of a statement within policy LUC2 requiring the use of appropriate SUDS systems, we would however recommend that the policy also highlights the Drainage Hierarchy to ensure that sustainable outfalls for surface water are utilised over the use of Sewers. We also support the approach to ensure that the development incorporates multifunctional green space and corridors. It is also recommended that the requirement for the optional Water Efficiency is detailed within the policy to ensure that development considers the sustainable use of resources.

Policy LUC3: Loughborough Science & Enterprise Park

Severn Trent are supportive of the inclusion of a statement within policy LUC3 requiring the use of appropriate SUDS systems, we would however recommend that the policy also highlights the Drainage Hierarchy to ensure that sustainable outfalls for surface water are utilised over the use of Sewers. It is also recommended that the requirement for the optional Water Efficiency is detailed within the policy to ensure that development considers the sustainable use of resources.

Policy SUA1: Shepshed Urban Area

Severn Trent are supportive of the principles outlined within SUA 1 in a particular ensures the timely and coordinated delivery of infrastructure to support sustainable communities. As identified in one of our previous responses there are a number of sites within Shepshed where we would anticipated Infrastructure improvements will be required therefore it is vital that sufficient certainty and lead in timescales are provided to enable delivery of the upgrades at the appropriate time.

We are supportive of the approach to address how water flow will be manage to enhance biodiversity and reduce flood risk, the sustainable management of surface water will be key for resilience to climate change and mitigating flood risk, Utilisation of the Drainage Hierarchy and SuDS are therefore key to delivering this aim.

Policy CC1: Flood Risk Management

Severn Trent are supportive of the approach to highlight flood risk within the Local Plan and promote the appropriate management of surface water through the use of SuDS and directing surface water to sustainable outfalls. Whilst we note that the drainage hierarchy is mentioned in Paragraph 7.23 supporting policy CC1 we would recommend that it is also specifically reference within Policy CC1 to ensure that the principle of the Hierarchy are followed on all development sites. We are supportive of the approach to protect natural watercourses in such that they are retained as open feature capable of supporting wildlife and providing sustainable outfalls for surface water.

Policy CC2: Sustainable Drainage Systems (SuDS)

Severn Trent are supportive of the use of SuDS and the approach to ensure that SUDS provide wider benefits than just water attenuation, the delivery of SuDS that meet the four pillar of SuDS will provide wider benefits to the environment and community though improved water quality, biodiversity and amenity. Severn Trent are now able to adopt some SuDS systems, but cannot undertake maintenance relating to some of the wider goals of SuDS, it is therefore vital the Maintenance schedule for SuDS is clear about which parties will be carrying out which tasks.

Policy CC4: Sustainable Construction

Severn Trent are supportive of the approach to promote SuDS, and the use of Rainwater Harvesting where viable as this will result in appropriate management of water as a resource. We are also supportive of the approach to require the Optional Water efficiency target and promotion of

BREEAM as they also support the good water efficiency measures, further detail on this aspect can be found in our standard response below.

Policy EV6: Conserving and Enhancing Biodiversity and Geodiversity

Severn Trent are supportive of the principle to improve the water quality of any water body as required by the WFD, Severn Trent work with the Environment agency to set out a plan of where we can deliver WFD improvements in a sustainable way such that water quality is improved to meet WFD whilst also acknowledging the need for sewerage and treatment to be available to meet growth demands.

We would however recommend that this policy also highlights the need to protect watercourses as open features such that they can provide access to water for wildlife, natural Habitat and sustainable method of discharging and conveying surface water.

Policy EV7: Tree Planting

Severn Trent are supportive of the approach to plant trees, we would however encourage that where tree planting is carried out within the urban landscape, consideration of SuDS systems such as Tree-Pits are considered due to their ability to support the growth and development of the tree, whilst also providing flood mitigation benefits.

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

Chris Bramley

Strategic Catchment Planner

growth.development@severntrent.co.uk