

15 May 2019

Our ref: Sileby 1

Dear Sir/Madam

Sileby Neighbourhood Plan

Thank you for the opportunity to comment on your consultation. Severn Trent have no objection to the general proposals within the Sileby Neighbourhood Plan. Please see some more detailed comments below:

Policy G2: Design

Severn Trent are supportive of the inclusion of bullet points f and g within Policy G2, the sustainable management of surface water is essential to ensuring that new development does not have an adverse impact on flood risk.

We would however recommend that reference to the Drainage Hierarchy (planning practice guidance paragraph 80) is made so to assist in the understanding that suitable outfalls for surface water will need to be identified.

Policy H1: Reserve Sites

Severn Trent acknowledge the identification of 6 reserve sites within the Neighbourhood Plan, however due to the scale of the individual developments they are unlikely to have any significant impact on the sewerage system. Due to the low likelihood of reserve sites being developed at this time it is not felt that any additional cumulative assessments are needed. If further certainty regarding the allocations or additional allocations are proposed within the emerging Charnwood Local Plan, we will review the need to undertake an assessment.

Policy ENV 8: Biodiversity Protection in New Development

Severn Trent are supportive of the general principles of Policy ENV 8, but feel that the policy should also identify the importance of existing watercourses to both flood risk and biodiversity.

We would therefore recommend that an additional bullet point is included with words to the effect of:

Existing watercourses (including dry ditches) on or adjacent to the development should be retained as open watercourses, where possible they should be retained in open space and incorporated into blue-green corridors to provide wider benefits to the development and surrounding area.

The loss of watercourses can result in increased flood risk, or the loss of sustainable outfalls for future growth.

Policy ENV 10: Managing Flood Risk

Severn Trent are supportive of Policy ENV 10, but would feel that additional emphasis on appropriate outfalls is needed.

We would therefore recommend that a bullet point is included identify the need to follow the drainage hierarchy as outlined within Paragraph 80 of the Planning Practice Guidance.

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

Chris Bramley

Strategic Catchment Planner

growth.development@severntrent.co.uk