

04 April 2019  
 Our ref: Darley Dale 2

Dear Sir/Madam

## Darley Dales - Neighbourhood Plan 2019

Thank you for the opportunity to comment on your consultation. We have provided some specific commentary in relation to the site allocations and policies, there is also some general guidance for your viewing.

Please keep us informed when your plans are further developed when we may be able to offer more detailed comments and advice.

### Site Allocations

The following information was produced as part of a sewer capacity assessment following adoption of the local plan.

The high/medium/low risk indicator refers to the likelihood that capacity upgrades to the sewerage network will be needed to accommodate a site. Being high risk doesn't guarantee that upgrades will be required, instead it highlights that a more detailed assessment should be undertaken to determine an outcome.

Site name	Dwellings	Comment	Risk
HC2(i) Land off Old Hackney Lane	57	Low risk as long as surface water is managed sustainably.	Low
HC2(j) Land off Old Hackney Lane	9	Small number of dwellings.	Low
HC2(k) Land to rear of RBS	135	May impact nearby combined sewer overflow	Medium

For all three of these sites, the most effective way to mitigate potential capacity issues on the local sewerage system is to ensure surface water is managed sustainably and not directly discharged into the combined sewerage system.

## Policies

We have provided some brief commentary on some policies detailed in the neighbourhood plan where we feel there is a link to services and work we provide and undertake;

### **NP11: Design Principles for C3 Residential Development**

This policy focuses on protecting the contextual settings of residential development but could go further to push and support sustainable development.

Some kind of wording to ask for betterment on surface water discharge rates from developed sites would help to protect and improve the local sewerage system(s) and in turn could provide betterment to the local watercourses and environment.

We support your push on good design and Building for Life 12 but again this could have more emphasis on the water environment and the need for more Sustainable Urban Drainage features which can in turn enhance local biodiversity and provide amenity value to communities.

## 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

Strategic Catchment Planner

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