

20 August 2021

Our ref: Broadway 1

Dear Sir/Madam

Broadway Neighbourhood Plan 2006 – 2030 Submission Version

Thank you for the opportunity to comment on your consultation, we have the following specific comments to make regarding your plan.

Policy HD.2: Use of Garden Land – Severn Trent is supportive of sub-section f. in that new development should not cause new or exacerbate any existing flood risk. This is especially important that any new developments abide by the drainage hierarchy in that surface water is managed sustainably and is not discharged into the foul/combined sewer unless there are no other feasible options.

Policy HD.3: Use of Brownfield Land – Severn Trent is supportive of development on Brownfield Land especially where there are opportunities for surface water separation and betterment. We are supportive of sub-section d. in that new development should not cause new or exacerbate any existing flood risk. This is especially important that any new developments abide by the drainage hierarchy in that surface water is managed sustainably and is not discharged into the foul/combined sewer unless there are no other feasible options.

Policy HD.4: Site Allocation – Land off Kennel Lane / Church Close – Severn Trent recommend that the developer for this site contacts our developer enquiry team early in the planning process to ensure that there is plenty of time to complete any hydraulic modelling to understand the impact of this development on the sewer network and whether any network reinforcements will be required. We also recommend that you expect the development to include water efficient design and that it will follow the precepts of the Drainage Hierarchy. The following wording may be appropriate:

'Development proposals should demonstrate 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. Developments should demonstrate that they are water efficient, where possible incorporating innovative water efficiency and water re-use measures.'

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.'

Policy BE.7: Energy Efficiency and Renewable Energy – Severn Trent is supportive of BE.7.2 incorporation of grey water recycling, rainwater harvesting and SuDS inclusion. We encourage you to go further with your water efficiency policy. New development will result in a need for an increase in the amount of water to be supplied across the Severn Trent region, and issues with the sustainability of some of our water sources are placing our supply resilience at risk. It is therefore vital that we reduce the amount of water used. We are supportive of the use of water efficient fittings and appliances within new properties, we encourage of 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 therefore encourage inclusion of the following policy wording:

Development proposals should demonstrate 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. Developments should demonstrate that they are water efficient, where possible incorporating innovative water efficiency and water re-use measures'

Policy NE.1: Trees and Hedgerows – Severn Trent acknowledge the need retain existing hedgerows and trees, however these are not the only natural features that need to be protected.

We would therefore recommend that watercourses are also included as features to protect. Watercourses, including dry ditches, form a vital part of the water cycle and enable developments to discharge surface water in a sustainable way. Watercourses should be retained in open space where they provide valuable habitats and resources for wildlife, and also minimises flood risk.

Policy NE.3: Local Green Spaces – Severn Trent are supportive of Local Green Spaces, it is important that planning policy does not prevent flood resilience works from being carried out if required in the future. Green spaces can also be enhanced where a good SuDS, scheme that incorporates design principles to enhance biodiversity and Amenity as well as attenuation. We would therefore recommend the following policy wording is added:

'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 NE.7: Flooding – Severn Trent are supportive of this policy especially the inclusion of policy wording including SuDS.

Policy NE.8: Foul Water Drainage Mitigation – Severn Trent are on the whole supportive of this policy. Specific comments for the sub-sections are as follows:

NE.8.1 – We are supportive of this policy and to enable this it will require developers to contact Severn Trent at the earliest opportunity in the planning process to ensure there is sufficient time to undertake hydraulic modelling should it be required and to determine if any network reinforcements are require to provide capacity in the network for new development.

NE.8.2 – We cannot support this policy wording in full. Whilst we recognise why it has been included it is the responsibility of the Sewerage Undertaker – in this case Severn Trent, under the

Water Management Act to provide capacity for growth. It is therefore not right to hold developers accountable if there is insufficient capacity to accept the additional flows. This emphasises the need for NE.8.1 to understand the risk to the network from new development and should there be capacity issues to promote a scheme to address the risks accordingly. I would add that if there are current concerns regarding any existing capacity issues that when incidents occur these are reported to Severn Trent so that they can be investigated and added to our risk prioritisation processes.

NE.8.3 – Severn Trent is supportive of this policy wording relating to grey water recycling.

NE.8.4 – Severn Trent is supportive of this policy, we would encourage you to include the following policy wording:

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.'

Reasons for including this wording within your policies include:

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.”

NE.8.5 – Severn Trent is supportive of this policy we would add that it is important that sufficient evidence is provided to both Severn Trent and the LLFA to justify why a connection to the combined sewer is the only feasible option.

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

Yours sincerely

Rebecca McLean

Strategic Catchment Planner

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