

03 October 2019

Our ref: Edenthorpe 1

Dear Sir/Madam

## Edenthorpe Neighbourhood Plan

Thank you for the opportunity to comment on your consultation for Edenthorpe Neighbourhood Plan. In general Severn Trent are supportive of the Neighbourhood plan for Edenthorpe. There are however, a number of areas where we would recommend minor amendments to the Neighbourhood Plan to ensure that the objectives of the plan are delivered and can be supported by Severn Trent.

The majority of the existing settlement of Edenthorpe is located outside of the Severn Trent region, we would therefore recommend that you contact Yorkshire Water to obtain their views on the plan. The eastern edge of the settlement and the adjacent fields are however located within the Severn Trent region for Sewerage provision.

### Policy 1: New Residential Development

We note that this policy identified the need to develop a masterplan for all development greater than 50 properties to ensure that the layout of the development is appropriate and provides strong links to the rest of Edenthorpe. Severn Trent do not object to this approach, However we would recommend that the policy also identifies the need to assess surface water drainage and SuDS at this stage.

Based on current industry best practice The SuDS Manual (CIRIA C753), it is important that surface water drainage is considered from the outset of a sites design process, this will enable sub catchments to be identified within the site that tie into the natural topography of the site. SuDS should be located within open areas, adjacent to or as part of open space to enable wider biodiversity and amenity benefits to be achieved.

Policy 1 also references the need to retain existing boundary features (hedgerows and trees), frontages and setbacks. It is recommended that this policy also references the protection of open watercourses.

The loss of watercourses and ditches is likely to have an adverse impact on the sustainability of future development and potentially result in an increase in flood risk. Watercourses should be retained where possible within areas of open space to ensure that access for maintenance is not lost and enable the watercourse to continue to deliver biodiversity and ecology benefits.

Severn Trent encourage the discharge of surface water in accordance with the Drainage Hierarchy, Planning Practice Guidance Paragraph 80. In such that it should be directed towards infiltration or watercourse where possible, this approach is vital to delivering effective and resilient sewerage

systems. We would therefore recommend that the Drainage Hierarchy is detailed within policy 1 alongside SuDS.

### **Paragraphs 8.11 and 8.12**

Severn Trent are supportive of the inclusion of paragraphs 8.11 and 8.12 as they support the delivery of sustainable surface water management and the delivery of SuDS in accordance with our recommendations for Policy 1.

### **Paragraph 8.16**

Severn Trent recognise the benefits of introducing trees and planting within residential street scenes. We would however note that there are also opportunities to incorporate surface water management into the design of these features helping to support the healthy development of the Trees / plants whilst also reducing flood risk and reliance of the Sewerage infrastructure.

We would therefore recommend that the neighbourhood plans advises the site design consider the use of multifunctional space such as surface water storage in conjunction with the development of street scene.

### **Policy 5: General Development Principles**

Bullet point d of policy 5 details the protection of existing hedgerows and trees, whilst this approach is supported by Severn Trent, we would advise that watercourses are included within this section to ensure that sustainable drainage opportunities are retained for future growth and development.

### **Policy 7: Local Green Spaces**

Whilst Severn Trent are supportive of the protection of green spaces, it is important that this policy should be written in such a way that it would support the development of flood resilience features within open green space provided it does not have a detrimental impact on the primary function of the green space. For example and additional bullet point stating.

*“3. The development of flood resilience schemes within areas of local green space will be supported provided that they do not adversely impact on the primary function of the green space.”*

In a number of cases the development of flood resilience features such as retrofits SuDS features have resulted in improvements to the amenity of a local space increasing biodiversity and amenity uses.

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.

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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