

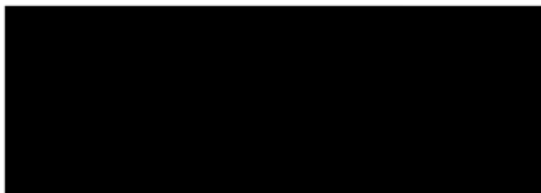
Comment

Consultee

Chris Bramley (1237004)

Email Address

Address



Event Name

Draft Dinnington Neighbourhood Plan

Comment by

Chris Bramley (1237004)

Comment ID

DNP24

Response Date

19/12/19 14:09

Status

Processed

Submission Type

Email

Version

0.4

Files

[Dinnington St John NP Resp.pdf](#)

Q1. To which document do your comments relate? Neighbourhood Plan Draft Submission Version

Q2. Do you wish to? Support with conditions

Q3. Please provide your comments below making clear which part of the document you are referring to (specifying relevant paragraphs, tables, figures, boxes or appendices).

See attached letter

Q5. Do you wish to be notified of the Council's decision under Regulation 19 of the Neighbourhood Planning Regulation 2012 whether to accept the Examiners' recommendation? (please tick) . Yes, please notify me of the Council's decision

18 December 2019

Our ref: Dinnington St Johns 1

Dear Sir/Madam

Dinnington St John's Draft Neighbourhood Plan

Thank you for the opportunity to comment on your consultation.

Severn Trent are generally supportive of the overall vision within the draft plan. There are however a few areas that we feel could be enhanced by slight alteration to assist with ensuring that development is undertaken in a sustainable way.

Brownfield Development

It is noted that the neighbourhood plan proposes to promote brownfield development. Whilst we recognise that redevelopment of brownfield sites presents a number of additional complexities, this can make development more difficult. The sewerage system within Dinnington is indicated to consist of a significant number of combined sewers. It is therefore likely that the brownfield site currently connects to the combined sewerage. We would however encourage developers to still consider the drainage hierarchy rather than the existing combined sewer connection.

Policy HLC 2

Severn Trent note that Policy HLC 2 New and Enhanced Health, Leisure and community Facilities looks to protect and enhance and create community facilities. Severn Trent would like to emphasise the need to consider multifunctional space within these spaces, by looking to incorporate SuDS within these spaces, there is the potential to enhance resilience to flood risk, improve biodiversity and amenity.

Policy STC 1

Severn Trent note that in the supporting information for Policy STC1 Maintaining and Enhancing the role and attractiveness of Dinnington Town Centre, that the plan states *"Provide planting with raised edges or adjoining seating to prevent vehicle overrun and trees"*

Severn Trent are supportive of the inclusion of trees and vegetation within the built environment, as the process introduces permeable areas and vegetation that absorb, slow and reduce the amount of surface water entering the sewerage system. We would however recommend that when considering adding these assets, developers also consider the use of source control SuDS (Tree-pits, rain gardens and Bio-retention areas) to increase the volume of surface water retained minimising flood risk and helping to improve water quality when discharged. The introduction of the SuDS element also has the opportunity to help these assets thrive. Introducing multifunctional assets like this is likely to result in wider benefits for the community and local area. Research has indicated that the introduction of green areas to urban spaces also has a positive impact on the economy and social wellbeing, therefore introducing these features is likely to help deliver the wider aims of the Neighbourhood Plan.

We would therefore recommend an additional bullet point that refers to the need to incorporate multifunctional space and SuDS where possible, for example.

“Projects to maintain and enhance the role and attractiveness of Dinnington Town Centre should consider the development of multifunctional space / assets that can assist with flood resilience, greening of the town centre as well as access to the town centre.”

Policy STC 5

Severn Trent note that Policy STC 5 Hot Food Takeaways focuses on the need to ensure that they are not located near schools.

Due to the nature of processes within Hot Food Takeaways, they utilise and produce high quantities of Fats, Oil and Grease (FOG). FOG is known to have a detrimental impact on the sewerage system, we would therefore recommend that where any new Hot Food Takeaways are proposed that they are built with Fat, Oil and Grease separators.

Policy NE 2

Whilst Severn Trent are generally supportive of the protection of Local Green Spaces, we would note that policy should be written in a way that it does not restrict flood alleviation schemes from being carried out. In urban area's suitable locations for sustainable and resilient flood alleviation schemes can be limited, Green Spaces can provide suitable land for flood alleviation schemes to be constructed within. In a number of cases, where the right solution is utilised it is also possible to provide benefits through enhanced biodiversity and amenity within the open space.

We would therefore recommend that a paragraph is added Policy NE 2 Local Green Spaces to the effect of

“Flood alleviation schemes within areas of open space will generally be supported provided that they do not have an adverse impact on the primary function of the open space.”

Policy NE 3

Severn Trent are supportive of the underlying principles behind policy NE 3 Biodiversity, we understand the benefits that can be achieved for the environment by improving biodiversity, it's also important that where these biodiversity is to be conserved, enhanced or created, opportunities to improve water quality are also utilised. There for consideration for the incorporation of SuDS should be high on the priority, both as part of the solution for providing biodiversity, but also to ensure that biodiversity is a key consideration of any SuDS solution in accordance with current industry best practice the SuDS Manual (C753).

Policy BED 2

Severn Trent note that Policy BED 2 Design and Infrastructure aims to ensure that the site is developed in accordance with good design principles.

We would highlight that Drainage and Sewerage are key design considerations than need to be incorporated from the start of the design process. It is important that surface water is manage sustainably through the use of SuDS and that it is discharge in accordance with the Drainage Hierarchy (Planning Practice Guidance Paragraph 80). To ensure that the layout will enable a sustainable management of surface water and prevent the need to connect it to the sewerage system where possible, the surface water outfall should be identified prior to the determination of the site layout. The design should look to deliver multi-functional spaces that can efficiently provide a number of benefits, but locating SuDS in areas of public open space, they can enhance biodiversity and amenity as well as deliver flood resilience and water quality improvements.

It is also important that development consider the use of water efficient technology, to ensure that water resources are retained as long as possible

We would therefore recommend that policy includes the following statements supporting particular elements of design:

- 1) Water Efficiency and Reuse
- 2) Surface Water Design (further guidance should be sought from the LLFA)

Water efficiency and Reuse

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.

All development should demonstrate that they are water efficiency, where possible incorporating innovative water efficiency and water re-use measures

All Development should demonstrate that unless not reasonably practicable the site designs have included water re-use measures.

The assessment of water re-use technologies considered should include both rainwater harvesting and greywater treatment techniques.

Rainwater harvesting systems should be designed in accordance with current British Standards BS8515:2009. Greywater systems should be designed in accordance with current British Standards BS8828-1:2010.

Surface water design principles

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.

All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are put in place unless demonstrated to be inappropriate.

All schemes for the inclusions of SuDS should demonstrate they have considered all four aspects of good SuDS design, Quantity, Quality, Amenity and Biodiversity, and that the SuDS and development will fit into the existing landscape.

The completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure that the SuDS are maintained in perpetuity.

Where possible, all non-major development should look to incorporate these same SuDS principles into their designs.

The supporting text for the policy should also include:

Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where people live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

Further guidance on SuDS and surface water management should be sort from the LLFA, as they hold the statutory responsibility for responding to planning regarding surface water.

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