

## Regulation 16 Consultation on the Submitted Broadwas and Cotheridge Neighbourhood Plan RESPONSE FORM

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, Broadwas and Cotheridge Parish Council has submitted the draft Broadwas and Cotheridge Neighbourhood Plan to Malvern Hills District Council. In accordance with Regulation 16, Malvern Hills District Council would like to invite comments from organisations and individuals on the Neighbourhood Plan.

This consultation runs for six weeks from Friday 15<sup>th</sup> February to 5:00pm on Friday 29<sup>th</sup> March 2019.

If you wish to comment on the draft Broadwas and Cotheridge Neighbourhood Plan **please complete and return this form no later than 5:00 pm on Friday, 29<sup>th</sup> March 2019 to:**

**Email:** [policy.plans@malvern hills.gov.uk](mailto:policy.plans@malvern hills.gov.uk) , or by

**Post:** Planning Policy, Malvern Hills District Council, Planning Services, The Council House, Avenue Road, Malvern, Worcestershire, WR14 3AF.

The personal information you provide on this form will be held and processed in accordance with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation 2018.

Please note that your name and comments will be made publicly available when displaying the outcome of this consultation and cannot be treated as confidential. Any other details, including signatures, private telephone numbers and email addresses will not be published on the Council's website, but the original representations with personal details redacted will be published. Your details will be retained in order for us to validate your comments. We will use these details to notify you of the progress on the Broadwas and Cotheridge Neighbourhood Plan. If you do not wish to be notified of the progress of the Neighbourhood Plan please let us know by ticking the appropriate box at the end of this response form.

Please fill in your details in the boxes below:

Full Name: Rebecca McLean

Organisation (if applicable): Severn Trent

Address (including postcode):

Telephone number:

Email address:

Please state which part of the draft Neighbourhood Plan (i.e. which section, objective or policy) your representation refers to (please use a separate form for each representation):

Policy P6

Please use the space below to make comments on this part of the Neighbourhood Plan.

Severn Trent are supportive of the policy and would also recommend that the following recommendations are included, especially in part P6 (A).

Severn Trent encourage the use of SuDS and SuDS principles to manage surface water run-off. We would also recommend that the Drainage Hierarchy is included to direct surface water to natural outfall routes such as infiltration or Watercourse before utilising sewers, as supported by Planning Practice Guidance Paragraph 80. Surface water should not be permitted to connect to a foul sewer.

We would also strongly recommend that local planning authorities incorporate the voluntary building standard of 110 l/p/d into their planning policies so that new development is designed in line with this approach. Further information on water efficiency can be found within the water efficiency section of this response.

Please use a separate form for each representation.

**Future Notification**

Please state whether you would like to be notified of the decision on the Neighbourhood Plan proposal:

Yes  No

Signature ...  ..... Date .....18/2/19.....

Thank you for completing this form.

18 February 2019

Our ref: Broadwas & Cotheridge 1

Dear Sir/Madam

## Broadwas and Cotheridge Neighbourhood Plan

Thank you for the opportunity to comment on your consultation. We have the following comments on your policies:

**Policy 6A:** Severn Trent encourage the use of SuDS and SuDS principles to manage surface water run-off. We would also recommend that the Drainage Hierarchy is included to direct surface water to natural outfall routes such as infiltration or Watercourse before utilising sewers, as supported by Planning Practice Guidance Paragraph 80. Surface water should not be permitted to connect to a foul sewer. We would also strongly recommend that local planning authorities incorporate the voluntary building standard of 110 l/p/d into their planning policies so that new development is designed in line with this approach. Further information on water efficiency can be found within the water efficiency section of this response.

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.

