

John King

From: Bramley, Chris
Sent: 03 January 2019 12:21
To: Localdevelopment
Subject: RE: Gotham Neighbourhood Plan Consultation
Attachments: Gotham 2 Response.pdf; Gotham WCS (Mar 18).xlsx

Dear Sir / Madam

Thank you for giving Severn Trent the opportunity to comment on the Gotham Neighbourhood Plan. Please find attached a copy of our response, which is made up of two parts

- 1) A written response to the Neighbourhood Plan (Gotham 2 Response.pdf)
- 2) A high level assessment of the impact of the proposed site allocations on our network. Gotham WCS (Mar 18).xlsx)

Please feel free to contact me if you have any further questions.

Kind Regards

Chris Bramley

Strategic Catchment Planner (Leics & Notts)
Sewerage Management Planning (SMP)
Severn Trent Water Ltd, PO Box 51, Raynesway, Derby, DE21 7JA (sat nav post code is DE21 7BE)
Mobile:

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Sent: 16 November 2018 15:26
To: Localdevelopment <Localdevelopment@rushcliffe.gov.uk>
Subject: COMMERCIAL:Gotham Neighbourhood Plan Consultation

Dear Sir/Madam

Rushcliffe Borough Council is consulting on the draft Gotham Neighbourhood Plan up until **5pm on Friday 4 January 2019**.

Further details are set out in the attached letter and at www.rushcliffe.gov.uk/planningpolicy/neighbourhoodplanning/, including where the consultation documents can be viewed and how comments can be made.

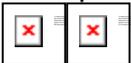
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Kind regards

Planning Policy
Rushcliffe Borough Council

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03 January 2019

Our ref: Gotham 2

Dear Sir/Madam

Gotham Neighbourhood Plan Consultation

Thank you for the opportunity to comment on your consultation. I am aware that you have previously consulted Severn Trent regarding the development of your local plan, at which point it was identified that the proposed development sites were highlighted as either medium or low risk. Please note that this risk relates to the likelihood for capacity improvements to be required and is not a directly related to flood risk.

Severn Trent are aware of a number of sewer flooding incidents that have occurred within Gotham. The Gotham Wastewater Treatment Works is currently operating within its permit, however we are looking at a scheme to improve the resilience at the works in wet weather so that operation of the overflow can be limited further i.e. more intense storms will be required to trigger operation.

It is clear from the high level assessment that some sites have been indicated to be as medium risk. Medium risk is not the risk of flooding, but relates to the likelihood of capacity improvements being required to accommodate development without detriment to the system. Medium risk sites are assessed on a site by site basis, when greater certainty about development is obtained.

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 sewer 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

Gotham Neighbourhood Plan Sewerage Capacity Assessment

Potential impact of proposed developments on sewerage infrastructure assets

Date 20/03/2018

NOTE: The purpose of these desktop based assessments are to indicate where proposed development **MAY** have a detrimental impact on the performance of the existing public sewerage network taking into account the size of the development proposals.

For most new development provided the surface water is managed sustainably through use of a SuDS the additional foul only flows will have a negligible impact on existing sewer performance but where there are pre-existing capacity constraints additional capacity improvements may be required.

Where subsequent detailed modelling indicates capacity improvements are required such work will be phased to align with development occupancy with capacity improvement works will be funded by Severn Trent Water. However, whilst Severn Trent have a duty to provide additional capacity to accommodate planned development, we also have a requirement to manage our assets efficiently to minimise our customers' bills. Consequently to avoid potential inefficient investment we generally do not provide additional capacity until there is certainty that the development is due to commence. Where development proposals are likely to require additional capacity upgrades to accommodate new development flows it is highly recommended that potential developers contact Severn Trent as early as possible to confirm flow rates and intended connection points. This will ensure provision of additional capacity can be planned into our investment programme to ensure development is not delayed.

Note: These are desktop assessments using readily available information and have not been subjected to detailed hydraulic modelling

Site Ref	Site Name	Size	Units	Sewage Treatment Works Catchment	Sewerage Comment			Potential impact on sewerage infrastructure
					Known network constraints	Assumed connectivity	Surface water disposal	
Gotham								
GOT 1	Land behind the Royal British Legion Building		20	Gotham STW	Flooding not predicted on Nottingham Road by the RPA layer. Downstream of Development on Curzon Street there is a cluster of external flooding events. The Return Period Analysis layer predicts flooding at this location in a 2 yr Return Period. If surface water flows are separated from the foul sewer the development is unlikely to have an impact on flooding.	Foul flows from development will join 225 mm dia sewer on Nottingham Road.	There is no surface water sewer on Nottingham Road or nearby watercourses. Development will have to utilise a SuDS solution. Some Surface Water likely to be discharged into foul/combined system.	Medium
GOT 3	Land north of Kegworth Road/Home Farm (east)		20					
Brownfield 1	Former British Legion Building		11		Development unlikely to impact system	Will join 225 dia foul sewer on Gladstone Ave.	There is no surface water sewer on Gladstone Ave. or nearby watercourses. SUDs will have to be utilised or storm run off will have to join foul sewer. Some SW likely to be discharged into foul/combined system.	Low
GOT 9	Land at Gladstone Av		3					
GOT 10	Glebe Land at Nottingham Road		12		Flooding not predicted on Nottingham Road by the Return Period Analysis layer. Downstream of Development on Curzon Street there is a cluster of external flooding events. Flooding is predicted at this location in a 2 yr Return Period. If storm flows separated the development unlikely to have an impact on flooding.	Foul flows from development will join 225 mm dia sewer on Nottingham Road at the head of the system.	There is no surface water sewer on Nottingham Road or nearby watercourses. Development will have to utilise a SuDS solution. Some Surface Water likely to be discharged into foul/combined system.	Medium
GOT 12	Ashcroft – Moor Lane (self build)		1					
Brownfield 2	NCT Bus Depot		19		Dev unlikely to impact system	Will join a 225 mm dia foul sewer on Moor Road	Able to drain to local watercourse	Low
				Flooding is predicted in a 5 year storm on Leake Road by the Return Period Analysis layer. Downstream of Development on Curzon Street there is a cluster of external flooding events. The RPA layer predicts flooding at this location in a 2 yr Return Period. If storm flows separated the development unlikely to have an impact on flooding.	Foul flows from development will join 225 mm dia sewer on Leake Road.	There is a watercourse across the road from the development that the development will be able to drain to.	Low	