

Clyst St Mary & Sowton Neighbourhood Plan Regulation 16 Consultation

South West Water Response

March 2025



**South West
Water**

South West Water [SWWL] comment in response to the Regulation 16 Clyst St Mary and Sowton Draft Neighbourhood Plan Consultation acting in its function as Statutory Water and Sewerage Undertaker [the Undertaker] for East Devon. SWWL has a duty under the Water Industry Act 1991 (as amended) to provide an effective, efficient and economic water supply and sewerage system, as well as upgrade and improve infrastructure to accommodate development, where suitable. The Undertaker support the Clyst St Mary and Sowton Neighbourhood Planning Forum in relation to the objectives promoting flood resilience within the proposed draft policies.

Water Efficiency

The South West region has among the highest water consumption rates in the country, with significant shifts in average consumption behaviours exacerbated by sharp increases in consumption during peak tourism seasons. To further sustainable water consumption, the Undertaker would fully support Clyst St Mary and Sowton Neighbourhood Planning Forum in including water efficiency measures within draft policies, such as: a requirement for all dwellings to achieve an estimated maximum water consumption of 110 litres/person/day; in line with Building Regulations Part G Optional Requirement G2. Such a policy would build upon Policies 3 & 38 of the East Devon Local Plan which consider sustainable construction and encourage the advancement of nationally set sustainability targets.

Similarly, SWWL would support the inclusion of a specified standard for water efficiency within this policy for proposals relating to non-residential development. An example policy imposing such a requirement can be found within the Draft Policy 96 of the Wiltshire Council Draft Local Plan (which underwent Regulation 19 consultation between September to November 2023). The wording proposed within this draft policy specifies the need for non-residential development to achieve a score of three credits within the Water (Wat 01 Water Consumption) issue category of the BREEAM New Construction Standard. Though primarily rural in character, implementing such policy will promote sustainability for all relevant development across the proposed plan period.

SWWL would support the inclusion of policy to encourage rainwater harvesting, [in line with/building on] adopted Strategic Policy 38 of the current East Devon Local Plan. Harvesting techniques, such as water butts, can help reduce strain on the water supply as this alternative water source can be used for non-potable uses – including the likes of gardening uses – rather than relying on potable, treated drinking water from the public supply. SWWL would encourage the inclusion of specific policy wording requiring development proposals to incorporate water efficiency and reuse measures such as rainwater harvesting, subject to viability.

Sustainable Urban Drainage Systems (SuDs)

SWWL supports the inclusion of policy BisC03 for the purpose of minimising flood risk and encouraging the inclusion of SuDs. With continuing trends of Climate Change resulting in hotter, drier summers and wetter, milder winters (IPPC, August 2021), impacts – like the threat of exacerbated drought and flood cycles – pose significant risk to our environments. During periods of drought the soil can become compacted, and when the rains arrive the soil cannot absorb the excess rainfall at a sufficient rate; increasing the volumes of surface water run-off, carrying soil and other surface particulates with it. The implementation of natural SuDs within the proposed policy, creates increased opportunity for maximising the use of rainwater on land for a longer period than direct sewer disposal. The utility of infiltration techniques like swales, tree planters, rain gardens, ponds and wetlands can provide a broad range of benefits, including:

- Enabling slow absorption prior to drought events of surface waters into the ground, allowing sufficient saturation into the soil substrata to provide greater drought resiliency;
- Enabling slow absorption, post drought events, of surface waters into the ground, promoting recovery of the moisture content of the soil.
- Reduction of surface water run-off, reducing sediment and other particulates entering sewers and surface water bodies.

Natural SuDs aim to mimic the way rainfall drains in the natural system to manage the quantity and quality of surface water runoff from developed sites, while also contributing to amenity and biodiversity. By enforcing the use of SuDs and rainwater harvesting techniques within all local development, the burden placed upon the existing drainage infrastructure can be limited, and potential betterment secured in combination with SWWLs ongoing initiatives. Slowing the rate of surface water runoff via water retention techniques supports the reduction of surface water ingress into the public sewerage network, as well as enabling development to maximise sustainability, biodiversity and water quality benefits.

SWWL would support Bishops Clyst parish in building on the requirements in the East Devon Local Plan and placing an increased requirement on development to incorporate rainwater harvesting measures and adhere to the surface water disposal hierarchy, the base standard of which being set within Planning Practice Guidance (Para ID: 7-056-20220825). A good example of where policy incorporating this has been adopted can be found in the Salford Local Plan Policy WA5 which states:

“Surface water shall be managed in line with the following hierarchy (highest priority first) recognising that a combination of measures from different levels in the hierarchy may be required to satisfactorily deal with all surface water:

1. *Infiltration to vegetation*
2. *Store rainwater for later use on-site*
3. *Infiltration (into the ground)*
4. *Discharge to a surface water body such as a pond*
5. *Discharge to a watercourse*
6. *Discharge to a surface water sewer or highway drain*

Only in exceptional circumstances, where evidence is provided that levels 1-6 above are not possible, discharge into the combined sewer network, either directly or indirectly”

Infrastructure Provision

As noted in the Draft Neighbourhood Plan (para 2.1, 4.18 & 6.1), ensuring suitable provision of infrastructure is critical in delivering sustainable development. SWWL support the inclusion of policy BisC10 imposing a policy requirement for all proposals to demonstrate how the infrastructure needs of development are addressed. Where such infrastructure capacity is not available within the Undertaker’s network, a package sewage treatment plant can be considered (as advised in Planning Practice Guidance [PPG] Ref ID: 34-020-20140306).

The Undertaker would support broadening the proposed wording of Policy BisC10 to include reference to Statutory Undertaker Infrastructure (Energy, Digital, Water, Wastewater, etc.), which may not be suitable for the applicant to provision themselves but requires requisition of the relevant Undertaker. The Undertaker recommend such additional wording to emphasise a requirement of the applicant to submit confirmation of capacity of relevant Undertaker’s to accommodate the proposed development.

'Where such provision must be delivered by a third party (i.e. Statutory Undertaker), the Applicant must provide suitable confirmation that either: required capacity provision is available, or will be delivered within a suitable timeframe in conjunction with the proposed development (including suitable phasing, as needed).'

Such wording is in adherence to PPG Ref ID: 34-020-20140306.

Drinking Water Assets

The level of development proposed by this Clyst St Mary and Sowton Draft Neighbourhood Plan can be accommodated within the existing water supply network and infrastructure. As the allocations progress, if it is determined that any network reinforcements are required, this would be funded through the Infrastructure Charge that SWWL receives from developers.

Wastewater Assets

To enable SWWL to support the level of development proposed by this Clyst St Mary and Sowton Draft Neighbourhood Plan will require work to be undertaken in the network to be able to suitably receive and accommodate the increase in flows expected as a result of the proposed development. Allowing flows above acceptable volumes from the occupation of the proposed dwellings within this plan prior to these works being completed would have an unacceptable impact on existing infrastructure, with an unacceptable risk of potential pollution events occurring. It is planned to complete the work within the wastewater network that will enable this level of development within the next 2 to 3 years.

Where speculative development proposals cannot be accommodated within the existing infrastructure capacities, SWWL may be obliged to object where development intends to utilise public water and/or sewerage infrastructure. SWWL will continue to proactively engage with the LPA and recommend the imposition of Planning conditions including timed (Grampian) conditions to enable the delivery of critical infrastructure, where suitable and relevant to the particular proposal; as has been included in several previous applications relevant to the Clyst St Mary and Sowton area.