

Woodbury Neighbourhood Plan Consultation

South West Water Response

November 2025



**South West
Water**

South West Water [SWWL] comment in response to the Regulation 16 Woodbury 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 supports the Woodbury Neighbourhood Planning Forum in promoting the principle of rainwater harvesting, and would further support the adoption of formal policy wording to aid water efficiency measures and protect against surface water issues as mentioned within the draft submission.

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 the Woodbury Neighbourhood Planning Forum in including enhanced 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.

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 was submitted for Examination in November 2024). 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. Harvesting techniques, such as water butts, can help reduce strain on the water supply as this alternative water source can be used for nonpotable 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 BE1 for the purpose of minimising surface water run-off by 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 Woodbury parish in building on the requirements in 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

Ensuring suitable provision of infrastructure is critical in delivering sustainable development. SWWL support the inclusion of policy wording 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).

Drinking Water Assets

Wastewater Assets

Drinking Water Assets and Wastewater Assets

SWWL in 2026 is carrying out upgrades to the drinking water and wastewater networks to enable and provide capacity for the current on-going new housing in the Woodbury area. Further new housing in the Woodbury area would require further assessment and may require additional upgrades to the drinking water and wastewater networks which would be confirmed as the new housing is allocated and progressed. 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.