

**Our Ref:** TSWC-L-0010-002  
**Your Ref:** HS290224 EX4 5BY

30 April 2024

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**FAO: Helen Steed**

**RE: Land to the North of Exeter, Stoke Hill, Exeter  
Consultation Response HS290224 EX4 5BY  
(ECC Ref: 23/1380/OUT)**

We refer to your consultation response (REF: HS290224 EX4 5BY) dated 29 February 2024, to the above application (REF: 23/1380/OUT) on Land to the North of Exeter, Stoke Hill, Exeter EX4 5BY.

#### **Surface Water Services**

The Applicant has demonstrated that the proposed surface water drainage system will discharge runoff from the proposed development "...as high up the hierarchy of drainage options as is reasonably practicable...".

#### Water re-use

This application is in outline only, and as such there is no detailed development masterplan to determine the suitability for water re-use across the site. Water butts will be included as standard and an assessment of the sites suitability for rainwater harvesting and/or greywater recycling will be undertaken at the reserved matters stage should planning permission be granted.

#### Discharge into the ground (infiltration)

The submitted Flood Risk Assessment (FRA) at Section 2, paragraph 2.12 states:

*"Infiltration testing undertaken by ..... showed negligible infiltration results across the Site".*

BRE 365: Soakaway Design states that in addition to the soil infiltration rate, other factors, including ground and slope instability, need to be considered in the assessment of soakaway drainage suitability. Given that some areas of the site have a slope of approximately 10° (1 in 5 or 20%), soakaway drainage may result in downslope re-emergence of water and/or slope instability.

Furthermore, it is a Devon County Council (DCC) Lead Local Flood Authority (LLFA) requirement that the base of any infiltration device must also be at least 1.0m above the seasonal groundwater table. Based on the site's geomorphological setting, and the presence of surface water features and hydrophilic vegetation, near surface groundwater is anticipated to be present particularly in the lower parts of the site which will limit the inclusion of soakaways.

***Infiltration drainage for the discharge of surface water runoff from the proposed development is not deemed suitable at this site as stated in paragraph 5.15 of the submitted FRA.***

## Discharge to a surface water body

As stated in the submitted FRA at paragraph 5.16:

*"... discharge of surface water runoff from the proposed development will follow existing arrangements with discharge into nearby water features for each respective catchment."*

### **Please revise your consultation response to the Local Planning Authority (LPA).**

Currently the SWW consultee response does not accurately reflect the information presented within the application documents, stating:

*"Having reviewed the applicant's current information as to proposed surface water disposal for its development, please note that method proposed to discharge into the ground (infiltration) is acceptable and meets with the Run-off Destination Hierarchy."*

For confirmation, the drainage proposals do not propose discharge into any existing SWW surface water or combined sewers and it is not intended to divert any land drainage runoff, flows from natural watercourses or groundwater in to any public sewer either.

Furthermore, the proposals do not require communication with the highway drainage network.

***All surface water runoff will be discharged directly, at reduced rates, into existing watercourses maintaining the existing drainage regime of the catchment.***

## **Foul Water Services**

Thank you for confirming that SWW is able to provide foul sewerage service from the existing public foul sewer.

A pre-planning point of connection enquiry was submitted to SWW in early 2021. SWW's response (REF: WR 3395530/AB) identifying a suitable point of connection is appended to this letter.

We understand that the site-specific charges for waste water sewer requisitions, sewer connections and adoption of the new sewers and pumping station may have subsequently expired but the strategy, route and point of connection is agreed in principle.

The details of this connection will be ratified during the Reserved Matters application. The Applicant will engage with SWW early on in the process to ensure the necessary infrastructure is in place before first occupation.

## **Clean Potable Water**

Thank you for confirming that SWW will require upgrades to its existing infrastructure to service the development.

A pre-planning point of connection enquiry was submitted to SWW in early 2021. SWW's response (REF: WR 3395530/AB) identifying a suitable point of connection and necessary reinforcement works is appended to this letter.

The details of this connection will be ratified during a Reserved Matters application. The Applicant will engage with SWW early on in the process to ensure the necessary infrastructure is in place before first occupation.

## **Conclusion**

We would be grateful if you would amend your response to the LPA to account for the information presented in this letter, particularly with regard to the surface water discharge destination to ensure your response accurately reflects the proposals as presented.

If you have any questions, or wish to discuss the proposal, please telephone me on 07362 276031 or contact me by email at [timwood@tswoodconsulting.co.uk](mailto:timwood@tswoodconsulting.co.uk).

We look forward to hearing from you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tim Wood'.

**Tim Wood** BEng (Hons) MCIWEM CWEM

Owner

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