

23 December 2022

Our ref: South Staffordshire 15

Dear Sir/Madam,

South Staffordshire Publication Plan (Reg 19)

Thank you for the opportunity to comment on your consultation, we have summarised our comments in this document for your viewing. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

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 on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.

Policy SA1:SA4 – Strategic Allocations

Wastewater services can be one of the more challenging infrastructure provisions to plan for, they are often non-pressurised systems that rely heavily on gravity and are vulnerable to the impacts of climate change and more intense rainfall.

We have provided a high level assessment of sewerage/drainage constraints for the allocations within the plan, you may have seen this data before. 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. This is indicated via a “high” risk rating, this does not mean they are showstoppers, more that we will need collaboration to progress sustainably. For most new development provided the surface water is managed sustainably through use of a Sustainable Drainage Systems 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. 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.

Allocation	Dwellings	Risk	Comment(s)
Land East of Bilbrook (SA1)	848	High	The size of the development may impact nearby sewage pumping stations, we encourage the developer to engage with us as early as possible.
Land at Cross Gen (SA2)	1,200	Medium	
Land North of Linthouse Lane (SA3)	1,200	Medium	
Land North of Penkridge (SA4)	1,129	Medium	

Policy SA5 – Housing Allocations

Reference	Allocation	Dwellings	Risk	Comment(s)
419a&b	Land at Keepers Lane and Wergs Hall Rd	317	High	The size of the development may impact nearby sewage pumping stations, we encourage the developer to engage with us as early as possible.
141	154a Walsall Road	31	High	There have previously been reports of hydraulic sewer flooding in this area, we encourage the developer to engage with us as early as possible. We have an existing capital project in this area which should be informed by the latest development proposals here.
536a	Land off Holly Lane	84	High	
136	Land at Landywood Lane	155	High	
638	Loades PLC	29	High	
704	Land off Norton Lane	31	High	
582	North of Langley Road (adjoining City of Wolverhampton boundary)	390	Medium	The size of the development may cause an impact to the existing public sewerage system, we
463 & 284	Land off Billy Bunns Lane and Gilbert Lane	223	Medium	
576	Land off Hyde Road (west)	22	Medium	

274	Land south of White Hill	120	Medium	encourage the developer to engage with us as early as possible.
239	Land west of Wrottesley Park Road (south)	150	Medium	
213	Bilbrook House	13	Low	No issues are anticipated from this site so long as surface water is managed sustainably.
139	Pool View, Church Bridge	46	Low	
730	Fishers Farm	10	Low	
228	Former Adult Training Centre off Histons Hill	29	Low	
224	Land adjacent to 44 Station Road	85	Low	
523	Land east of Wolverhampton Road	49	Low	
119a	Land adjoining Saredon Road	60	Low	
005	Land at Cherry Brook	88	Low	
006	Land at Boscomoor Lane	80	Low	
617	Four Ashes Road	63	Low	
079	Land south of Kiddemore Green Road	43	Low	
416/416a	Land off Orton Lane	79	Low	
285, 562/415, 459	Pool House Road	223	Low	
82	Land between AA49 Stafford Rd & School Lane	48	Low	
397	Land adjacent to Brinsford Lodge, Brookhouse Lane	35	Low	
313	Land off Himley Lane	22	Low	
379	Land off Ivetsey Road	18	Low	
426a	Bridge Farm: 54 Long Street	15	Low	
036c	Land at Weeping Cross (adjoining Stafford Borough)	81	Low	
016	Land at Pear Tree Farm	39	Low	
251	Hall End Farm	17	Low	

Policy SA7 – Employment Allocations

Allocation	Area (Ha)	Risk	Comment(s)
West Midlands Interchange (WMI) (E33)	297	High	We are currently liaising with the developer around the proposed connection strategy. We may need to undertake capacity improvement works to accommodate this site.
ROF Featherstone (E18)	36	Medium	The size of the development may impact nearby sewage pumping stations, we encourage the developer to engage with us as early as possible.
Vernon Park (E14)	2.8	Low	No issues are anticipated from this site so long as surface water is managed sustainably
Hilton Cross (E20)	4.8	Low	
I54 (E24)	4.8	Low	
I54 Western Extension (North) (E44)	16.7	Low	

Policy EC11 – Infrastructure

Whilst we are not a statutory consultee to the planning process, we do have an obligation under section 94 of the Water Industry Act to effectively drain the public sewerage system, which includes ensuring new development can be accommodated. 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.

To ensure we can efficiently deliver on this in a timely manner we would encourage all new development to engage with us on their proposals as early as possible through a developer enquiry (please see section below). If improvement works are required to accommodate a site, and we have not been made aware ahead of reasonable time we may apply for a Grampian style planning condition on the development to delay the delivery and ensure we have sufficient time to implement any required capital work on the system.

Policy NB7 – Managing flood risk, Sustainable urban drainage systems & water quality

The impact new development has to the existing public sewerage system can be significantly reduced by sustainable surface water management. This can be split into two key requirements:

1. New development should utilise Sustainable Drainage Systems (SuDS). These should be delivered in a management train and not just a single "end of pipe" basin. The surface water runoff rate should be no greater than the equivalent greenfield runoff rate. Even brownfield re-development sites should aspire to limiting surface water discharge in line with greenfield runoff rate.
2. New development should discharge surface water in line with the drainage hierarchy;
 - I. Discharge to the ground
 - II. Discharge to a watercourse
 - III. Discharge to a designated surface water drainage system
 - IV. Discharge to the combined sewerage system. This is highly discouraged and may lead to localised sewer capacity issues such as sewer flooding or increased spills from storm overflows.

We would highlight that both requirements should be delivered on, the use of SuDS alone does not negate the impact of increasing or new surface water discharges to the combined network. We support the districts alignment to Staffordshire County Council Sustainable Drainage Systems (SuDS) Handbook which details the need for both SuDS and adherence to the drainage hierarchy.

For your information we have set out some general guidelines and relevant policy wording that may be useful to you.

Wastewater Strategy

We have a duty to provide capacity for new development in the sewerage network and at our Wastewater Treatment Works (WwTW) and to ensure that we protect the environment. On a company level we are producing a Drainage and Wastewater Management Plan covering the next 25 years, which assesses the future pressures on our catchments including the impacts of climate change, new development growth and impermeable area creep. This plan will support future investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks.

Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.

Surface Water

Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy:

Drainage Hierarchy Policy

New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.

Supporting Text:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

“Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.”

Sustainable Drainage Systems (SuDS)

Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity. We therefore recommend that the following policy wording is included within your plan regarding SuDS:

Sustainable Drainage Systems (SuDS) Policy

All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.

All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.

Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.

Supporting Text:

Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

Blue Green Infrastructure

We are supportive of the principles of blue green infrastructure and plans that aim to improve biodiversity across our area. Looking after water means looking after nature and the environment too. As a water company we have launched a Great Big Nature Boost Campaign which aims to revive 12,000 acres of land, plant 1.3 million trees and restore 2,000km of rivers across our region by 2027. We also have ambitious plans to revive peat bogs and moorland, to plant wildflower meadows working with the RSPB, National Trust, Moors for the Future Partnership, the Rivers Trust, National Forest and regional Wildlife Trusts and conservation groups.

We want to encourage new development to continue this theme, enhancing biodiversity and ecology links through new development so there is appropriate space for water. To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:

Blue and Green Infrastructure Policy

Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.

Supporting Text:

The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States:

“Planning policies and Decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”

Green Open Spaces Policy

Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

Supporting Text:

We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.

Water Quality and Resources

Good quality watercourses and groundwater is vital for the provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that the water quality of our supplies are not impacted by our operations or those of others. Any new developments need to ensure that the Environment Agency’s Source Protection Zones (SPZ) and Safeguarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.

Every five years we produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of our customers whilst protecting our environment over the next 25 years. We use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. We are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand.

New developments have a role to play in protecting water resources, we encourage you to include the following policies:

Protection of Water Resources Policy

New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 163 states:

“Planning policies and decisions should contribute to and enhance the natural and local environment... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as river basin management plans;”

Water Efficiency Policy

We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard:

New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 149 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed – [link](#).

We recommend that all new developments 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 per minute or less.
- Water butts for external use in properties with gardens.

Water Supply

For the majority of new developments, we do not anticipate issues connecting new development, particularly within urban areas of our water supply network. 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. If significant development in rural areas is planned, this is more likely to have an impact and require network reinforcements to accommodate greater demands.

Developer Enquiries

When there is more detail available on site-specific developments, we encourage developers to get in contact with Severn Trent at an early stage in planning to ensure that there is sufficient time for a development site to be assessed and if network reinforcements are required that there is time to develop an appropriate scheme to address the issues. We therefore encourage developers to contact us, details of how to submit a Developer Enquiry can be found here -

<https://www.stwater.co.uk/building-and-developing/new-site-developments/developer-enquiries/>

We hope that this information has been useful to you and we look forward to hearing from you in the near future.

Yours Sincerely,

Jack Robinson

Strategic Catchment Planner

GrowthDevelopment@severntrent.co.uk