

17 March 2021

Our ref: Catshill and North Marlbrook 2

Dear Sir/Madam

Catshill and North Marlbrook Neighbourhood Plan

Thank you for the opportunity to comment on your consultation, we are largely supportive of your plan however have the following specific comments to make.

Policy ENV4 – Severn Trent is supportive of this policy, in particular the comment that states ‘unless a proposal can demonstrate that the contribution of the scheme would outweigh the harm to Local Green Space’ as we believe this provide opportunity where SuDS schemes may be required to utilise Local Green Spaces. Severn Trent understand the need for Local Green Space and the need for them to be protected, however local green spaces can provide suitable locations for schemes like flood alleviation to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation can result in additional benefits to the local green space in the form of biodiversity or amenity improvements. We would therefore recommend that the following point is added to Policy ENV4:

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.

Environment Policy ENV8 – Severn Trent is supportive of this policy, however we would encourage you to go further in sustainable design principles to include water efficiency. Whilst the protection of sources of water is important it is also important that new development considers how water will be utilised within the home. By reducing the amount of water utilised development can reduce its impact on the sewerage network, reduce the quantity of water needing treatment for consumption and reduce the quantity of wastewater requiring treatment. This will have positive impacts on the environment and result in more sustainable development that is more resilient to the impacts of climate change. Building regulations already highlight the need for water efficient design. To ensure that the design element is considered from the outset of design it is recommended that the policy specifies water efficiency. Some example wording is provided below to assist with implementation of our request.

All development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day.

The implementation of water re-use technology could also help to reduce the need for water, providing additional benefits to both water supply resilience and Sewerage resilience.

All Development should demonstrate that unless not reasonably practicable the site designs have included water re-use measures.

Environment Policy ENV9 – Severn Trent is supportive of this policy regarding the provision of SuDS within new developments. We would however encourage specific reference to the drainage hierarchy. The management of surface water is a key element in delivering new development without increasing flood risk on or off site. Planning Practice Guidance Paragraph 80 provides a priority system that new development should follow to ensure that surface water is discharged to a sustainable outfall. Severn Trent would recommend that this is highlighted within the design policy. Some example wording is provided below to assist in the interpretation of this request.

All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible.

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.”*

Environment Policy ENV10 – Severn Trent is supportive of this policy regarding requirement for permeable paving.

Please keep us informed when your plans are further developed, particularly regarding housing allocations, 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 sewage 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

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