

15 April 2019

Our ref: Solihull 9

Dear Sir/Madam

Solihull Draft Development Plan

Thank you for giving Severn Trent the opportunity to comment on your consultation. The results of our high level sewer capacity assessment highlights some possible risks of the proposed development on the sewerage and surface water network.

As a water company we have a general duty to provide water supplies, sewerage and sewage treatment capacity for planned development. In response to your draft proposals we have undertaken high level assessments, using readily available catchment knowledge, to identify where development proposals may have an adverse impact on current sewer performance. The intention being to flag locations where development proposals are likely to require capacity upgrades should they come to fruition and therefore could potentially impact the delivery date of the development. For each site allocation we have assessed the potential impact of additional development flows on sewer performance and used a simple traffic light assessment to indicate whether capacity upgrades are likely to be required. The definition of low impact means that the need for sewerage capacity upgrades is unlikely. For medium and high impact sites there is a moderate to high likelihood, respectively, that the development of these sites will require sewer capacity upgrades. A list of the high and medium impact sites can be found below.

The purpose of these initial high level assessments are to flag where further investigation work is likely to be required to inform refinement of the development plan and where necessary facilitate more detailed discussions. At this stage we have had to make high level assumptions with regard to flow rates and connection points. However as we get better certainty that development will proceed and developers drainage strategies are refined we will undertake more detailed hydraulic sewer modelling to finalise the scope of any capacity upgrades in order to minimise delay to delivery.

For all new developments, be they on greenfield or brownfield land, we strongly encourage the management of surface water using a Sustainable Drainage System (SuDS) approach and the drainage hierarchy which aims to discharge surface 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; and
4. to a combined sewer

High impact sites

- West of Corbetts Close, Hampton in Arden
- Field Between Waste Lane and Old Waste Lane

- Meriden Road
- Frog Lane
- Maxstoke Lane, Meriden
- Moat Lane, Vulcan Road
- Pheasant Oak Farm
- Barretts Farm
- Windmill Lane - Kenilworth Road
- Nesfield Grove

Medium impact sites

- West of Tutnall Drive, Hockley Heath
- West of Newton Road, Knowle
- St George & St Teresa Catholic Primary School
- East of Olton Baptist Church
- Chelmsley Wood Shopping Centre
- 90 School Road
- Norton Green Lane, Opposite Norton Green STW
- Football Ground east of Bramcote Drive
- West of Dickens Heath
- South of Knowle
- Hampton Road
- Land Damson Parkway
- UK Central Hub/HS2 interchange
- TRW/ The Green
- Jensen House, Auckland Drive
- Trevallion Stud
- Land south of School Road
- Lugtrout Lane
- South of Dog Kennel Lane
- Solihull Town Centre

In addition to this we have set out some general guidelines that we hope you will take into consideration.

Position Statement

As a water company we have a general duty to provide water supplies, sewerage 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 on new development 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

Elaine Ring

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