

30 October 2020

Our ref: Stroud 12

Dear Sir/Madam

## Stroud District Local Plan Review Draft Plan - Additional housing options

Thank you for the opportunity to comment on your consultation. Please see our specific comments relating to your questions below:

**Question 1a** – Yes, Severn Trent is supportive of this intensify option and it is our preferred approach. Where existing allocations have already been assessed in a number of locations for example Gloucester Fringe, Stonehouse and Cam there are planned strategic sewerage improvement schemes in this area. If there is sufficient notice before these scheme commence it is likely that additional capacity could be accommodated as part of these schemes.

**Question 1b** – No, Severn Trent would be supportive on the grounds that we would have to provide capacity for new development if this option were chosen. However, it would not be our preferred option, this is because dispersed growth at lots of locations has the potential for lots of smaller capacity upgrades being required. It is less efficient for us to have lots of smaller schemes than focussing improvements in a couple of locations. It is possible that some locations would be accommodated utilising existing capacity in the sewerage network, however these would need to be assessed through hydraulic modelling to determine the impact.

**Question 1c** – Yes, Severn Trent would be supportive of this option. It would be unlikely that any major development of this size could be accommodated in the existing network, therefore capacity improvements would likely be required, however improvements could be focussed in strategic locations. The locations identified have potential to be incorporated as subsequent phases of existing capacity upgrade schemes. We would however note that there would be a requirement for a site masterplan and if multiple developers are involved there should be an agreed drainage strategy that is developed and worked to. This helps to avoid a piecemeal approach to construction of new sewerage infrastructure.

**Question 1d** – No, Severn Trent is least supportive of this option. It would not be our preferred option, this is because dispersed growth at lots of locations has the potential for lots of smaller capacity upgrades being required. It is less efficient for us to have lots of smaller schemes than focussing improvements in a couple of locations. It is possible that some locations would be accommodated utilising existing capacity in the sewerage network, however these would need to be assessed through hydraulic modelling to determine the impact.

**Question 1e** - Yes

**Question 2** – It is likely that a hybrid option may be required if options A or C are unable to deliver the full housing requirement. We would be most supportive of hybrid options A-C or A-B and would still wish to avoid any options including option D. A hybrid option including option B would be supported if early consultation with Severn Trent were sought regarding available capacity in the existing network.

**Question 3** – Yes, reserve housing sites give Severn Trent the opportunity to plan ahead for different scenarios and potential future phases of growth to our catchments. However, we would look to see that previously allocated sites are developed first as this would avoid potential for schemes to be delivered and not be required if the development planned were not to come forward. If non-reserve allocations were to be replaced we would ask that early indication is provided to Severn Trent by Stroud LPA.

**Question 4b** – Yes, reserve allocations on Towns and Villages would be acceptable, providing consultation of the developer with Severn Trent is conducted and that surface water is managed sustainably on site through SuDS.

**Question 4c** – Yes, this would be supported providing that early indication of the additional growth point being likely to go ahead due to the often longer lead times involved with large new developments. It would be preferable if there was more clarity on whether the development is likely however as it would impact upon the strategic planning of existing sewerage schemes in the areas of the proposed sites.

**Question 4d** – No, It would not be our preferred option, this is because dispersed growth at lots of locations has the potential for lots of smaller capacity upgrades being required. It is less efficient for us to have lots of smaller schemes than focussing improvements in a couple of locations. It is possible that some locations would be accommodated utilising existing capacity in the sewerage network, however these would need to be assessed through hydraulic modelling to determine the impact.

**Question 4e** – Yes, see answer to Q1E and 2 as this still applies.

**Question 6** – What should trigger a reserve site coming forward?

We would be less supportive of a delay in planning being used as a reason because sites which have planning submitted could already have schemes planned and should be prioritised ahead of new sites.

We would be supportive of using failure to deliver to build rates as a reason for reserve housing coming forward as we recognise there is a duty to provide the housing requirement.

We would be supportive of reasons including inability to deliver the allocated sites due to land owners being unwilling to sell or environmentally inhibiting reasons such as flood risk being unable to be mitigated.

**Question 7a** – BER016 Hook Street Farm Berkeley – This site is outside of Severn Trent's sewerage area therefore we have no comments from a sewer capacity perspective.

**Question 7b** – BER017 Bevans Hill farm, Berkeley - This site is outside of Severn Trent's sewerage area therefore we have no comments from a sewer capacity perspective.

**Question 7c** – HAR017 Land at Sellas Road, Hardwicke, 15dw – This site is located adjacent to new development which is already being addressed by a strategic sewerage growth scheme. Due to the small size of the development it is likely to have a low risk of sewer flooding provided that surface water is managed sustainably on site through SuDS and not discharged into the foul network.

**Question 7d** – STR065 Beeches Green Health Centre, Stroud, 20dw – due to the size of the development it is unlikely that the development would have significant impacts on sewer flood risk. The downstream network is included in scheme to reduce hydraulic capacity constraints on the network. As this is a brownfield site there are opportunities to provide surface water betterment by separating surface water and managing sustainably on site through SuDS.

**Question 7e** – WHI012 Land South of Hyde Lane, Whitminster, 20dw – This site is considered to be Medium risk of sewer flooding as it would discharge to Attwools SPS which has existing capacity issues. The cumulative impact of developments in Whitminster should be assessed through hydraulic modelling to determine the impact. Surface water should be managed sustainably on site through SuDS.

**Question 9a** – PGP1 Land at Grove End Farm, Whitminster – 2250dw, 13Ha Employment – We would be supportive of this site. The nearest sewer connections in Whitminster drain to the Frampton catchment which is small and would have a very high impact of flooding and there would be insufficient capacity at Frampton Waste Water Treatment Works (WwTW). Due to this it would be advised that the development site be either connected into the Stanley Downton WwTW (Stroud) catchment to the East via a motor way crossing and be incorporated into existing growth improvement schemes planned in the Stonehouse area. Alternatively flows could be pumped 5.3km north into the Netheridge WwTW (Gloucester) catchment and incorporated into existing growth improvement schemes planned in the Hardwicke area. Early indication of whether this site is likely to be allocated would be encouraged to ensure there is sufficient time to incorporate into existing scheme plans. We would recommend that a master planning approach is undertaken to ensure that if there are multiple developers/landowners that they work together towards an overall drainage strategy to avoid a piecemeal approach to developer built infrastructure.

**Question 9b** – PGP2 Broad location at Moreton Valence/Hardwicke – 1500dw – This would be the more preferable potential growth point as the development could be incorporated into existing capacity improvement scheme in the area and avoid a long Rising Main route which would be the more sustainable option in the longer term. Early indication of whether this site is likely to be allocated would be encouraged to ensure there is sufficient time to incorporate into existing scheme plans. We would recommend that a master planning approach is undertaken to ensure that if there are multiple developers/landowners that they work together towards an overall drainage strategy to avoid a piecemeal approach to developer built infrastructure.

Please keep us informed when your plans are further developed 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

[Redacted Signature]