WONDERFUL ON TAP

SEVERN TRENT

29 October 2024

Our ref: Sandwell 8

Dear Sir/Madam,

Sandwell Local Plan Regulation 19 Consultation

Thank you for the opportunity to comment on your consultation. We have no specific comments to make on the specific policies detailed in the Plan and are supportive of the plan and policies overall. 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.

Wastewater - Network

Using the site allocation data provided in the Regulation 19 consultation documents (and where appropriate previous data provided as part of the Infrastructure Delivery Plan and Water Cycle Study), we have undertaken a high-level review of each of the site allocations provided.

Each site has been assessed to identify what the likely impact would be on both the Foul network and, where appropriate, the Surface Water network. These have been given separate RAG statuses, the RAG status can be interpreted as shown below.

Key	Potential impact on sewerage infrastructure (Foul / Surface Water)
Low Risk	Capacity Improvements are not anticipated to be required to accommodate the development.
Medium Risk	Capacity improvements may be required to accommodate the proposed development.
High Risk	Capacity Improvements are likely to be required to accommodate the proposed development.

It must be noted that the purpose of the desktop-based assessments is 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. These are desktop assessments using readily available information and have not been subjected to detailed hydraulic modelling. We have produced a summary of the sites and their respective risks below. We request that consultations / discussions are initiated as early as possible so we can perform more detailed assessments of the sites and their potential impact(s).

Reg 19 Site Ref	Site Address	Proposed Dwellings	Gross Site Area (Ha)	Net Site Area (Ha)	Brownfield / Greenfield	Assumed Delivery Year	Potential Impact on Foul Network	Potential Impact on Surface Water Network	Comments
SEC1-1	Whitehall Road, Tipton		5.3				Low	Low	
SEC1-2	British Gas, Land off Dudley Road, Oldbury		1.05				High	Low	
SEC1-3	Junction Two, Oldbury		1.12				Low	Low	
SEC1-8	Roway Lane, Oldbury (Call for Sites)		3.65				Low	Low	
SEC1-4	Coneygre Business Park (open land)		7.22				Medium	Low	
SEC1-6	Brandon Way/ Albion Road, West Bromwich		1.54				Low	Low	
SEC1-5	Site off Bilport Lane, Wednesbury		5.29				Low	Low	
SEC1-7	Legacy 43, Ryder Street, West Bromwich		0.88				Low	Low	
SH1	Brown Lion Street/ Bloomfield Road	27	0.46	0.46	B	27-28	Low	Low	
SH10	Tipton Conservative And Unionist Club, 64 Union Street Tipton	14	0.19	0.19	B	29-30	Not Assessed	Not Assessed	This site was not assessed. Due to the low number of proposed dwellings, we would not expect this site to have a detrimental impact to the existing network. It is expected that surface water flows would be managed according to the drainage hierarchy.
SH11	Sandwell District & General Hospital, West Bromwich	121	0.82	0.82	B	29-31	High	Low	
SH13	Silverthorne Lane/ Forge Lane, Cradley Heath	81	2.41	1.81	B	34-35	High	Low	
SH14	Langley Maltings Western Road Langly B69 4LY	71	2.72	2.04	B	39-41	Low	Low	
SH15	Macarthur Road Industrial Estate, Cradley Heath	13	0.3	0.3	B	34-35	Not Assessed	Not Assessed	This site was not assessed. Due to the low number of proposed dwellings, we would not expect this site to have a detrimental impact to the existing network. It is expected that surface water flows would be managed according to the drainage hierarchy.
SH16	Cradley Heath Factory Centre Woods Lane Cradley Heath	170	4.85	3.64	B	29-34	Low	Low	
N	Cradley Heath Factory Centre Woods Lane Cradley Heath						Low	Low	
SH17	Land adj to Droicon Estate, Portway Road, Rowley Regis	28	0.7	0.7	B	29-30	Low	High	
SH18	STW/SMBC Land Friar Park Road Wednesbury	630	26.3	15.75	GB	27-35	High	Low	
SH19	land at Horseley Heath, Alexandra Road, and Lower Church Lane, Tipton	45	2.26	1.7	B	39-41	Low	Low	
SH2	Land adjacent to Asda, Wolverhampton Road, Oldbury	62	1.5	1.5	G	31	Low	Low	
SH20	Elbow Street Old Hill	33	0.77	0.77	B	30-31	High	Low	
SH21	Dudley Road East	90	2.65	1.99	B	34-37	High	Low	
SH22	Tatbank Road Oldbury B69 4NB	52	1.15	1.15	B	39-41	Low	Low	
SH23	Trinity Way / High Street, 28-64 High Street West Bromwich	53	0.6	0.6	B	30-32	Low	Low	
SH24	Cokeland Place / Graingers Lane, Cradley Heath	16	0.36	0.36	B	34-35	Not Assessed	Not Assessed	This site was not assessed. Due to the low number of proposed dwellings, we would not expect this site to have a detrimental impact to the existing network. It is expected that surface water flows would be managed according to the drainage hierarchy.

Reg 19 Site Ref	Site Address	Proposed Dwellings	Gross Site Area (Ha)	Net Site Area (Ha)	Brownfield / Greenfield	Assumed Delivery Year	Potential Impact on Foul Network	Potential Impact on Surface Water Network	Comments
SH25	Bradleys Lane / High Street Tipton	189	5.6	4.2	B	37-41	Medium	Low	
SH26	Lower City Road Oldbury	73	1.83	1.83	B	34-37	Low	Low	
SH27	Site surrounding former Post office and Telephone exchange Horseley heath tipton	52	1.16	1.16	B	34-36	Low	Low	
SH28	Friar Street Wednesbury	45	1.01	1.01	B	39-41	Low	Low	
SH29	Used Car Sales site on corner of Lower Church Lane and Horseley Heath Tipton	23	0.56	0.56	B	39-40	Low	Low	
SH30	Land to east of Black Lake West Bromwich	83	2.45	1.83	B	39-41	High	Low	
SH31	Summerton Road, Oldbury	36	0.89	0.89	B	34-36	High	Low	
SH32	Bank Street (West) Hateley Heath	43	0.85	0.85	B	29-31	High	Low	
SH33	Wellington Road Tipton	40	0.91	0.91	B	39-40	Low	Low	
SH34	Brandhall golf Course	190	5.18	3.88	G	27-31	Low	Low	
SH35	Rattlechain Site Land to the north of Temple Way Tividale	518	14.8	41.8	GB	34-41	High	Low	
SH36	Land between Addington Way and River Tame; Temple Way (Rattlechain)	36	0.9	0.9	G	39-40	Low	Low	
SH37	Edwin Richards Quarry Portway Road Rowley Regis	626	52	15	B	26-41	High	High	
SH38	Brades Road, Oldbury	51	1.14	1.14	B	33-34	High	Low	
SH4	Lower High Street (Station hotel & Dunns Site).	20	0.28	0.28	B	31-32	High	Low	
SH40	Langley Swimming Centre, Vicarage Road, Oldbury	20	0.49	0.49	B	29-30	Low	Low	
SH41	North Smethwick Canalside Smethwick	500	8.7	6.5	B	29-38	Medium	Low	
SH42	Forge Put, junction Franchise Street and Beebee Ro	10	0.14	0.14	B	30-31	Not Assessed	Not Assessed	This site was not assessed. Due to the low number of proposed dwellings, we would not expect this site to have a detrimental impact to the existing network. It is expected that surface water flows would be managed according to the drainage hierarchy.
SH43	Land of Tanhouse Avenue, Great Barr	46	1.66	1.15	G	39-40	Low	Low	
SH44	Wyndmill Cresent, West Bromwich	11	0.19	0.19	B	33-34	Not Assessed	Not Assessed	This site was not assessed. Due to the low number of proposed dwellings, we would not expect this site to have a detrimental impact to the existing network. It is expected that surface water flows would be managed according to the drainage hierarchy.
SH45	Site Of 30-144 Mounts Road Wednesbury	45	1.07	1.07	B	24-25	Low	Low	
SH47	Site Of Former Stone Cross Neighbourhood Office Clifton Lane West Bromwich	14	0.32	0.32	B	26-27	Not Assessed	Not Assessed	This site was not assessed. Due to the low number of proposed dwellings, we would not expect this site to have a detrimental impact to the existing network. It is expected that surface water flows would be managed according to the drainage hierarchy.
SH49	St Johns St, Carters Green	33	0.82	0.82	B	31-32	High	Low	
SH5	Mill Street, Great Bridge	40	0.88	0.88	B	28-30	Low	Low	
N	Mill Street, Great Bridge						Low	Low	
SH50	tentec, guns lane	126	0.6	0.6	B	29-32	High	Low	

Reg 19 Site Ref	Site Address	Proposed Dwellings	Gross Site Area (Ha)	Net Site Area (Ha)	Brownfield / Greenfield	Assumed Delivery Year	Potential Impact on Foul Network	Potential Impact on Surface Water Network	Comments
SH51	providence place/ bratt st	40	0.74	0.4	B	36-37	High	Low	Our initial assessments of this site resulted in a 'High' risk, but the development scope has reduced since the assessment and publication of the Regulation 19 (from 70 dwellings to 40) so this should be taken into account when reviewing this assessment.
SH52	overend street, west bromwich	70	0.71	0.71	B	39-41	High	Low	
SH53	Grove Lane/ Cranford Street/ London Street	500	1.23	1.23	B	26-32	Medium	Low	Our initial assessments of this site resulted in a 'Medium' risk, but the development scope has increased from 392 dwellings to 500 between the assessment and publication of the Regulation 19 and that should be taken into account when considering the potential risk
SH54	Cranford Street / Heath Street / Canal	115	5	2.88	B	29-32	Low	Low	
SH55	Cape Arm Cranford Street	170	2.13	2.13	B	29-32	Low	Low	
SH56	Moilliett Street Park - Grove Lane masterplan	35	0.77	0.77	B	29-30	Low	Low	
SH57	Grove Street / MMUH / School - Grove Lane MP	85	2.18	0.59	B	29-31	Low	Low	
SH58	Abberley Street Grove Lane Master Plan	140	2.48	2.48	B	29-34	Low	Low	
SH59	Beever Road Great Bridge	18	0.83	0.83	B	24-25	Not Assessed	Not Assessed	This site was not assessed. Due to the low number of proposed dwellings, we would not expect this site to have a detrimental impact to the existing network. It is expected that surface water flows would be managed according to the drainage hierarchy.
SH6	Swan Lane North of A41 West Bromwich	147	3.78	2.42	B	26-29	Low	Low	
SH62	Thandi Coach Station Alma Street Smethwick B66 2RL	58	0.71	0.71	B	24-28	Low	Low	
SH63	Star and Garter, 252 Duchess Parade, West Bromwich	60	0.05	0.05	B	27-28	High	Low	
SH64	Windmill House, Windmill Lane, Smethwick	10	0.21	0.21	B	30-31	Not Assessed - New addition since previous assessments	Not Assessed - New addition since previous assessments	This site has not been assessed as this is a new addition when comparing to previous consultations (Water Cycle Study, LDP). However, due to the low number of proposed dwellings, we would not expect this site to have a detrimental impact to the existing network. It is expected that surface water flows would be managed according to the drainage hierarchy.
SH66	Wednesbury Police Station, Albert Street, Wednesbury	15	0.33	0.33	B	29-30	Not Assessed - New addition since previous assessments	Not Assessed - New addition since previous assessments	This site has not been assessed as this is a new addition when comparing to previous consultations (Water Cycle Study, LDP). However, due to the low number of proposed dwellings, we would not expect this site to have a detrimental impact to the existing network. It is expected that surface water flows would be managed according to the drainage hierarchy.
SH7	The Boat Gauging House & Adjoining Land, Factory Road, tipton, DY4 9AU	50	0.57	0.57	B	27-29	Medium	Low	
SH8	Alma Street Wednesbury	23	0.52	0.52	B	28-29	Low	Low	
SH9	The Phoenix Collegiate, Friar Park Road Wednesbury	84	4.8	2.84	B	30-31	Low	Low	
SM1	Chances Glass Works	276	0.64		B	118 - 29-31 158 - 38-41	Low	Low	Our initial assessments of this site resulted in a 'Low' risk, but the development scope has increased from 22 dwellings to 276 between the assessment and publication of the Regulation 19 and that should be taken into account when considering the potential risk.
SM2	Lion Farm	200	2		G	32-36	Low	Low	Our initial assessments of this site resulted in a 'Low' risk, but the development scope has increased from 70 dwellings to 200 between the assessment and publication of the Regulation 19 and that should be taken into account when considering the potential risk.
SM3	Evans Halshaw car showroom	140	0.89		B	29-32	High	Low	
SM4	Army Reserve, Carters Green	63	1.17		B	34-36	High	Low	
SM5	cultural quarter, west brom	52	1.09		B	29-30	High	High	
SM6	queens square livin	396	3.06		B	38-41	High	Low	
SM7	West Bromwich Central	343	4.53		B	29-33	Medium	Low	
SM8	George Street Living	327	2.36		B	34-39	Medium	Low	

Wastewater – Treatment

The wastewater treatment works assessment we provided for Part 2 of the Infrastructure Delivery Plan remains unchanged but has been summarised again below.

Sewerage Treatment Works Name	Estimated Spare Capacity	Watercourse Constraints	Notes
Minworth	Medium	High	Keep monitoring performance Scoping the work necessary to increase capacity has not commenced. We expect this will be an AMP9 (2030-2035) investment. Based on expansion of capacity at our other largest sites.
Lower Gornal	Low	Low	No growth identified for this catchment Currently, growth can be accommodated without investment.
Ray Hall	Low	Low	Capacity at Ray Hall to remain as is with growth at the catchment to be accommodated at Minworth
Roundhill	High	Very High	Ongoing pressure with growth in the catchment. Keep monitoring performance of the works. We will need more information and timeline for the planned development to allow us time to plan ahead and identify options for increasing capacity. Scoping the work necessary to increase longer term capacity has not commenced.

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 have produced a Drainage and Wastewater Management Plan (DWMP) 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 supports future investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks. More information on our DWMP can be found on our website https://www.severntrent.com/about-us/our-plans/drainage-wastewater-management-plan/.

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 (2021) paragraph 174 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 2021) Paragraph 174 states:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

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 air and water quality, taking into account relevant information 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

> *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.*

for the optional higher water efficiency standard:
Supporting Text:
National Planning Policy Framework (July 2021) Paragraph 153 states:

"Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, costal 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,
Joshua James

[redacted]
Strategic Catchment Planner
GrowthDevelopment@severntrent.co.uk