

Mr Maurice Barlow
Solihull Metropolitan Borough Council
Forward Planning
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West Midlands
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Our ref: UT/2006/000335/SF-
05/IS1-L01
Your ref:
Date: 13 August 2012

Dear Mr Barlow

WATER CYCLE STUDY (REVISED VERISON)

Thank you for providing additional details to address the concerns raised in our previous response. We received this on 12 July 2012.

We welcome clarification that your growth proposals remain unaltered from the original RSS figures that the assessments have been based upon.

Water Quality

Although it is only a basic WCS, there are only 3 sewage treatment works being utilised and their capacity has been assessed – and this is deemed to be sufficient to cater for the proposed level of growth. The submission of the supporting Severn Trent matrix is appreciated as it recognises there may be potential issues within some of the development areas. Your Authority acknowledges that detailed hydraulic modelling will be required for all developments - the main downside to this is that the onus is placed on Severn Trent rather than your Authority employing consultants. Another downside is that this approach is more likely to be piecemeal (i.e. doing hydraulic assessments as and when developments get planning permission) rather than consistent 'joined up' approach of a full WCS.

As raised previously, your WCS does not assess the impact of the proposals on implementation of Water Framework Directive, and the actions set out within the Humber River Basin Management Plan. Based upon the findings of this study, the Core Strategy should include a commitment to ensure that occupation of new developments shall be timed with any improvements required to the foul sewerage infrastructure and/or the receiving sewage treatment works (following assessment by Severn Trent) in order to prevent WFD deterioration within the catchment. This would provide comfort that where assessments have shown a potential issue which requires upgrading/improvements, development will not be occupied until those improvements are in place.

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Water Resources

We note that Severn Trent's assessment was undertaken in January 2012, and as such should have used the most recent Water Resources Plan (2010).

Your WCS seems to indicate that as there is an anticipated deficit of water resources during the plan period, a combined approach of water efficiency and development of new water infrastructure and sources will be necessary to ensure sufficient water availability to support the proposed level of development.

Policy P11 and paragraph 10.6.4 of your Core Strategy sets high standards from developers in terms of water efficiency, however the WCS does not provide any detail of at what point in development water resources availability will become a problem, and what timescales would be involved for developing new sources and the improvement of infrastructure - key for the associated timing of development. This information would be required for the Infrastructure Delivery Plan, and this should be discussed with Severn Trent.

Finally, it is not clear how the 8% and 25% water efficiency figures have been arrived at, and whether the figure of 25% is to be included as a requirement of the policy.

Yours sincerely

Mrs Laura Perry
Planning Liaison Team Leader

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