



Severn Trent Water

10th April 2014

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Your Ref	
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Dear Hayley,

Shropshire Council Site Allocations & Management of Development Plan (SAMDev)

Thank you for the opportunity to comment on your Site Allocations and Management Plan and you recent consultations on this subject.

Our approach has been to concentrate on the main strategic site allocations being as these areas are perceived to have the greatest level of development certainty and are likely to have the greatest impact on our infrastructure, therefore requiring appropriate planning. A review of the smaller development settlements indicated that a detailed assessment is not required at this time, since we believed that the scale of development proposed within these locations can be accommodated as part of our established investment planning cycles.

The reasoning for our approach is that:-

Severn Trent Water has a general duty under section 94 (clauses 1a and 1b) of the Water Industry Act (1991)

To provide, improve and extend such a system of public sewers (whether inside its area or elsewhere) and so to cleanse and maintain those sewers and any lateral drains which belong to or vest in the undertake as to ensure that that area is and continues to be effectually drained; and

CONTINUATION

To make provision for the emptying of those sewers and such further provision (whether inside its area or elsewhere) as is necessary from time to time for effectually dealing, by means of sewage disposal works or otherwise, with the contents of those sewers.

In effect, this places an absolute obligation upon Severn Trent Water to provide such additional capacity as may be required to treat additional flows and loads arising from new domestic development. It would be worth noting that the quality of sewage effluent discharge does not deteriorate in a linear relationship with increasing load and as such, multiple properties can be connected without causing significant impact on Severn Trent's consent levels.

Severn Trent Water is also under a legal duty to comply with its sewage treatment works discharge permits, issued by the Environment Agency under the Water Resources Act 1991 (as amended by the Environment Act 1995 and the Environmental Permitting Regulations of 2010). Should we be in a position of being unable to comply with a permit to discharge as a consequence of growth within the sewerage catchment, we are obliged to remedy the situation using our own resources.

It is also worth noting whilst our sewage works performance is continually monitored its comparison against the relevant discharge consent criteria does not always reflect the amount of spare headroom at a treatment works. Due to efficiency reasons we will often operate our treatment works close to our discharge consent limits to optimise operational resources. Consequently where current performance is very close to its consent thresholds it does not always indicate that there is no spare capacity for future development. Again, once we are more confident of development proposals we will then investigate in greater detail the sewage treatment works serving your area and form detailed proposals to provide additional capacity (if required) to enable your growth proposals.

In summary we have an absolute obligation to provide sewage treatment capacity for future development and to ensure that the performance of the sewerage system is not unduly affected. We therefore welcome the opportunity to contribute to your Local Plan process, yet for most developments proposals we would not foresee any particular issues to provide additional capacity as and when required.

Yours sincerely

Steve Southern
Business Support Manager
Water Strategy