

## **Torbay Strategic Planning questions for SWW**

### **Background:**

To support the review of the Torbay Local Plan 2012-2030, which will roll forward the time horizon to 2040, Torbay Council commissioned an update of the previous Sewer Capacity Study (2014) to provide suitable evidence base. The updated Torbay Sewer Capacity Assessment (SCA) (May 2023), consisted of hydraulic modelling to predict the effects of population growth, urban creep, climate change and water efficiency improvements on the Torbay sewer network.

Overall, the SCA suggests the sewer network will face substantial challenges due to increased sea level rise and rainfall, urban creep and population growth (modelled as 300 dwellings per year).

Predicted combined sewer overflows and sewer flooding have been indicated by 2040. The majority of this detriment is as a result of climate change and a very small proportion is caused by the predicted population growth combined with urban creep throughout Torbay. The report suggests there will be a 10% increase in combined sewer overflows (CSOs) by 2040 as a result of more rainfall due to climate change. There is an additional 1% increase in CSOs predicted due to a combination of the modelled level of population growth and urban creep from the existing built areas.

Natural England have advised that the Lyme Bay and Torbay Marine Special Area of Conservation (SAC) target is to maintain/improve water quality. SACs are protected areas designated through UK regulations to conserve habitats and species. The predicted increase in CSOs is likely to decrease water quality in this protected area, in contrast to the target set out by Natural England. This designated SAC covers all of the waters in and around Torbay.

The predicted 1% increase in CSOs as a result of future population growth and urban creep will have implications in terms of delivering this growth in Torbay. The Council must assess plans or projects under the Habitats Regulations, known as a habitats regulations assessment (HRA), to test if a plan or proposal (i.e. proposed growth levels) could significantly harm the designated features of a SAC. This work will be carried out at a later point to inform decisions about future growth plans for Torbay. There will be an assessment of what mitigations are achievable and appropriate to offset the increase so that the growth does not result in the increased CSOs predicted. The Council already requires strict adherence to the surface water disposal hierarchy for new development.

We have been advised that the reduction in surface water entering the system required to mitigate climate change will be significant and it is unlikely that nature based solutions alone will create sufficient capacity in the system. New development should achieve the appropriate level of drainage mitigation (incorporating additional capacity to deal with climate change and 'creep'). However some urban regeneration schemes, permitted development and existing urban creep, alongside climate change indicate pressures on the sewer network.

### **Question:**

**How do SWW plan to mitigate the predicted increase in CSOs and sewer flooding shown in the recently prepared SCA model, particularly as a result of climate change? Please provide any details of planned infrastructure improvements and programmes to adapt to climate change and at least reduce the occurrences of these events.**

The Council needs a good understanding of these infrastructure plans and their delivery. Assurance is needed to understand 'what' improvements are planned and also the 'how' they will be delivered with the associated timeframes. The Council will need reliable and detailed information to ensure suitable adaptation measures are in place and that the mitigations are appropriate to support the HRA.