

16th October 2014

SuDS Team
Defra Area 3D
Nobel House
17 Smith Square
London,
SW1P 3JR

By email - suds@defra.gsi.gov.uk

Your contact is: Chris Saunders

Dear Sirs

RE: Delivering Sustainable Drainage Systems - September 2014 CLG / DEFRA Consultation

I refer to the above consultation and therefore please find below Reading Borough Council's response to the questions you have asked in respect of this consultation, which has been approved by the Borough's Planning Application Committee.

Q1. Do you agree that the proposed revision to planning policy would deliver sustainable drainage which will be maintained? If not, why?

The proposed revision to planning policy would deliver sustainable drainage systems as long as the National Planning Policy Framework is amended to clearly state that all major developments must install such a system. These different options for SUDS systems should follow the previously consulted DEFRA National Standards and Guidance which as indicated should be included within the National Planning Policy Guidance. The inclusion within the Planning System makes sense as this will allow a holistic approach to a development site to be undertaken by one authority. However it is well known that SUDS systems are very effective in reducing surface water runoff in to drainage channels thereby reducing the risk of flash flooding and this latest consultation is a further delay in ensuring that they are installed on new developments. It is imperative that legislation to formally implement SUDS comes sooner rather than later.

Q2. How should the Local Planning Authority obtain expert advice on sustainable drainage systems and their maintenance? What are the costs/benefits of different approaches?

Our Authority, as a Unitary, has already created a SUDS team which is incorporated within the Transport Development Control section. This team already accepts voluntary SUDS applications in accordance with the principles set out in Schedule 3 of the Flood and Water Management Act 2010. We will seek to use

this teams experience to assess the SUDS aspects of development and their responses will be a material consideration when all aspects of the Planning Application is considered.

Q3. What are the impacts of different approaches for Local Planning Authorities to secure expert advice within the timescales set for determining planning applications?

As stated within Q2, we as a unitary already have a team in place to assess SUDS. However, the proposed changes will remove the separate charging regime that formed part of the principles in Schedule 3 and thus the financial support to local authorities to set up and operate a SUDS advice, assessment and approval process. Local authorities do not have the funding to take on additional responsibilities with resource and financial implications without either financial support or an increase in fees for planning applications for which SUDS will be required.

Q4. Do you agree that minor size developments be exempt from the proposed revision to the planning policy and guidance? Do you think thresholds should be higher?

The proposal to restrict SUDS to major applications is welcomed as these are the developments which generate the majority of surface water runoff. The previous proposals involving minor developments would have generated a significant number of drainage applications which would have had severe implications for resources but for only a minimal gain in the reduction of surface water runoff.

Q5. What other maintenance options could be viable? Do you have examples of their use?

If SUDS are located within a proposed highway they can be adopted by the Highway Authority through a Section 38 agreement, a practice which this authority already undertakes. Future maintenance is then covered for a 15 to 20 year period by a commuted sum.

Q6. What evidence do you have of expected maintenance costs?

For attenuation tanks we charge a commuted sum of £15,000 to cover an annual clearance of the tanks by a jetter. For permeable block paving we charge £10 per metre square to cover a twice annual clean by a sweeper.

Q7. Do you expect the approach proposed to avoid increases in maintenance costs for households and developers? Would additional measures be justified to meet this aim or improve transparency of costs for households?

There should not be any additional costs for existing householders as the proposals are only for new developments. For new residents on new developments if there is a service management agreement the new owners should be aware of the charge before they purchase. While if they are taken on by the Local Authority or Water and Sewage Company the agreement between these bodies and the developer should take in to account future maintenance costs and therefore there again should be no additional charge to householders.

Yours faithfully



Chris Saunders
Transport Development Control Manager