

# Appendix 1 - Wokingham Borough Council SuDS Strategy Public Consultation Summary

This report summarises the responses and key themes which emerged from the responses to the Wokingham Borough Council (WBC) SuDS Strategy public consultation.

The strategy sets out the long term vision for the use of Sustainable Drainage Systems in the Borough with a focus on managing flood risk and improving the water environment. It is designed to be used by developers when master planning all major developments and for planners when assessing planning applications.

WBC sought feedback on the quality of information provided in the strategy regarding the implementation of SuDS in Wokingham and the local standards for developers to adhere to. Stakeholders were invited to comment on WBC's new SuDS Strategy during an 8 week public consultation period ending on Friday 16<sup>th</sup> September 2016.

WBC received a total of 13 responses, 10 of which were through the online questionnaire, and the other 3 were comments received via email. 11 of the responses received came from residents of Wokingham Borough Council and 1 came from a consultant on behalf of developers and 1 from the University of Reading.

The majority of responses were generally supportive of the SuDS Strategy for Wokingham and confirmed that the SuDS Strategy met with stakeholder expectations of what such a strategy might include.

The themes that emerged from this exercise included:

- The potential to adopt the SuDS Strategy as a Supplementary Planning Document.
- The importance of adequate maintenance plans to be agreed during the outline planning application stage so that there is a clear understanding of who the responsible party will be and that they are aware of the specific maintenance requirements for such structures/features.
- The supportiveness of residents for the Council to adopt a strategy like this to ensure that developers are held accountable. With this in mind, residents would like to see this strategy adopted as a Supplementary Planning Document.
- The importance of all stakeholders considering other methods of flood risk management including natural flood risk management techniques such as the use of woody debris and flood storage.

## 1. Summary of Questionnaire Responses

The rest of this document provides a summary of the questionnaire responses received.

### **Q1 Is the purpose of the document made clear in section 1?**

100% Yes

0% No

**Q2 Are there any other stakeholders not mentioned that this document should be targeting?**

A number of respondents suggested that this document should also target those responsible for paying the developers for the maintenance of SuDS. In addition, respondents felt that other stakeholders such as community flood groups, the Rivers Trust, the Loddon Fisheries Conservation Consultative and the Loddon Catchment Partnership should be seen as the targeted stakeholders for this strategy.

*WBC response: In terms of the first comment relating to those responsible for paying the developers for the maintenance of SuDS, dependent on who is adopting the SuDS feature, it would usually be the local authority, a water company, or a management company that would take on the role of managing the SuDS feature. In the case of the water company and the local authority, the developer would usually be required to pay them a commuted sum in order to fund the cost of maintenance over the lifetime of the feature. If a management company is put in place, in many cases, the residents would be required to pay a maintenance fee which would fund the costs of maintenance of the SuDS feature. For this reason, officers will extend the list of stakeholders to include the local authority, water companies, and management companies. Officers will also extend the list of stakeholders to include community groups such as the ones mentioned above, as these groups play an important role in the management of flood risk across the borough.*

**Q3 Do you agree with the 6 key objectives for flood risk and the water environment for Wokingham?**

90% Yes

10% No

**If no, what else should the Council be considering?**

One respondent felt that an additional objective should be to slow the flow of surface water into local watercourses as Wokingham is in an area of scarce water resources and SuDS also offer opportunities to help ease this problem. Furthermore, objective 1, to manage known surface water drainage issues in the borough' should be more clear in stating that the objective is to manage the flood risk which surface water can cause.

*WBC response: This is not necessary as the 6 objectives adequately cover slowing the flow of water into a local watercourse and the overall management of flood risk from both surface water and fluvial flooding.*

**Q4 Does the document clearly explain what SuDS are and why SuDS should be used?**

80% Yes

20% No

**Are there any other SuDS features that should be included in table 1.3?**

Two respondents indicated that the list is too limiting and should include natural flood risk management techniques such as woody debris and flood storage.

*WBC response: The national SuDS Manual, produced by CIRIA, was used to develop this table and natural flood risk management techniques are not included within the manual. Natural flood risk management techniques include the alteration, restoration or use of landscape features to reduce flood risk and although they play a similar role to SuDS in managing flood risk by slowing the flow, in many cases it is not possible to use a natural flood risk management technique within a development to manage the surface water drainage.*

**Q5 Is there any more information that needs to be provided in relation to how SuDS features can improve water quality?**

90% No

10% Yes

**Q6 Is the geological suitability for SuDS in Wokingham made clear?**

100% Yes

0% No

**If not, how can this be made clearer?**

N/A

**Q7 Is the hydrological suitability for SuDS in Wokingham made clear?**

80% Yes

20% No

**If no, how can this be made clearer?**

Some respondents have noted that although the hydrological suitability for SuDS in Wokingham has been made clear, the document does not make it clear who will be responsible for managing and maintaining SuDS features and for ensuring that the features are able to absorb the potential hydraulic flows similar to that of the 2007 rainstorm event.

*WBC response: This information is not provided within the strategy because the maintenance and management of SuDS features for individual development sites will be decided on a case by case basis, depending on the drainage strategy and the organisation responsible for managing the system that the SuDS feature is serving. Having said this, in order to ensure that a clear plan for maintenance will be in place, the strategy requires that a developer submits a maintenance plan to the Local Planning Authority during the outline planning application stage.*

**Q8 Is the information provided about why particular SuDS are needed in particular locations made clear?**

90% Yes

10% No

**If not, how can this be made clearer?**

One respondent has stated that the strategy should include hydraulic calculations based on recorded rainfall from the July 2007 rainfall event.

*WBC response: This kind of detailed technical information is not required within the strategy. Furthermore, this kind of information is not available for all areas of the borough.*

**Q9 Is there any more information that should be included in the section regarding opportunities for SuDS outside of new developments?**

80% No

20% Yes

Those who said that more information could have been included suggested speaking to Chris Uttley from Stroud District Council and also the local fisheries groups and community flood action groups.

*WBC response: Officers have spoken with Chris Uttley and are aware of the techniques being used in Stroud to manage flood water. Officers are also working with partner agencies to try and implement these types of measures in various locations with watercourses across the borough. Whilst information relating to natural flood risk management and community projects elsewhere across the county is important and a good source of information to build projects on, this information would be better placed in the Local Flood Risk Management Strategy which is being reviewed in 2017.*

**Q10 Is there anything that hasn't been mentioned in the SuDS Strategy that the Council should include with regards to improving water quality under the Water Framework Directive?**

100% No

0% Yes

**Q11 Are the requirements of planning applications in terms of SuDS made clear?**

70% Yes

30% No

**If no, how can this be made clearer?**

Respondents who said the requirements of planning applications in terms of SuDS could be made clearer all stated that the strategy should be adopted as a Supplementary Planning Document (SPD) to ensure that developers are held accountable when building new housing developments.

*WBC response: It is considered that it is more appropriate that this is adopted as a Council strategy. An SPD is a document that provides additional guidance to the policies contained in a Local Plan. The Council's current Local Plan is being reviewed. SPDs adopted under the current Local Plan will become out of date where policies are superseded. Adopting the strategy at present as an SPD will likely mean that this is only relevant for a relatively short period of time. In addition, SPDs are onerous to amend and adopt. As national guidance and best practice is developing, a strategy document is more easily adapted to reflect this relative to an SPD. A strategy would carry weight as it has been out to public consultation and been adopted by the Council.*

**Q12 Are the links to current Wokingham Borough Council Policy made clear?**

100% Yes

0% No

**If no, how can this be made clearer?**

N/A

**Q13 Do you have any comments on the local standards for sustainable drainage in Wokingham?**

Only one respondent responded to this question suggesting that developers should be forced to design infrastructure to cater for a flooding event on the scale of that of 2007.

*WBC response: Since February of this year, the Environment Agency have implemented new climate change allowances for both surface water and river flooding, which must be considered by developers and consultants when producing flood risk assessments and drainage strategies for new developments. Officers have amended the strategy to include information relating to these amended climate change allowances.*

**Q14 Are there any additional subject areas you feel should be included in the Strategy?**

Four respondents replied to this question by stating that more information about maintenance requirements of SuDS should be included within the document. It was suggested that the strategy included a deadline date for the introduction of a maintenance plan and also an explanation of how the maintenance would be financed. Maintenance plans and the financing of maintenance should be included at the outline planning application stage.

*WBC response: Please refer to Q7 which relates to these suggestions.*

**Q15 Do you have any further comments on the Strategy? Please quote the page number your comments refer to, if applicable.**

Only one respondent answered this question suggesting that the 6 months ground water monitoring needs to appear in the checklist.

*WBC response: This has been amended in the final version.*

## 2. Summary of email responses:

In addition to those who filled out the online questionnaire, 3 responses were also received via email from a resident of the borough and a consultant on behalf of both the South of the M4 SDL Consortium and the University of Reading.

The first email response received by a resident of Wokingham stated that rather than developing a SuDS Strategy, Wokingham Borough Council should minimise flood risk by maintaining rivers and streams through dredging and maintaining existing drainage assets. In response to this, officers have said that whilst the maintenance of existing watercourses and drainage features is key, it is also vital to ensure that sustainable drainage systems are implemented in future developments as these methods of draining sites are able to match greenfield run off rates and in some case achieve betterment. Furthermore, WBC contractors inspect and maintain the ditches which are included on the Critical Ditch List and the gulleys on the Gulley Maintenance list on a regular basis to minimise the risk of flooding. These lists are reviewed and updated with new information every year. It is also important to note that WBC is not responsible for the majority of ordinary watercourses in the borough and there are numerous riparian owners who also share a similar responsibility. In addition, the Environment Agency is responsible for coordinating the management of watercourses designated as Main River. WBC officers work in close partnership with the Environment Agency and other risk management authorities to ensure that there is a coordinated approach to flood risk management across the borough.

The other 2 responses, by a consultant on behalf of the South of the M4 SDL Consortium and the University of Reading, provided technical comments on the Appendix A Technical Guide. There were a number of suggestions made, the main ones of which are summarised below. Wokingham Borough Council has not made all of the suggested amendments given by this respondent as it was felt that a few of the suggestions were unnecessary and would reduce the ability of the document to serve its purpose which is to ensure that the most appropriate and well-designed SuDS schemes are implemented in Wokingham. The table below shows the amendments that have been made to the SuDS Strategy in accordance with some of the suggestions made by this respondent.

Local standard	Changes made
WokBC-LS5	<p>The local standard requires demonstration that proposed development discharge rates do not exceed their corresponding greenfield/previously developed rates for return periods 1 in 1 year, 1 in 2 year, 1 in 5 year, 1 in 30 year, 1 in 100 year and 1 in 100 year including climate change return periods. The respondent commented that this goes against current national guidance and such a definitive spread of return periods is impractical to achieve. These comments have been noted and an amendment has been made such that the local standard reads: <i>'Demonstration of this is required for the 1 in 1 year, 1 in 30 year, and 1 in 100 year including allowances for climate change, unless discharge rates have been restricted to QBar'</i>.</p> <p>The section relating to this in the major development outline application</p>

	drainage checklist has also been amended to match this.
WokBC-LS11	<p>There was a comment regarding the fact that current Defra/EA guidance allows for Long Term Storage to be removed if mitigated through compliance to QBar for all discharge rates above the 1 in 1 year return period. This has been noted and an amendment has been made such that the local standard is written as followed: <i>'Long term storage must be provided to limit the volume of runoff from the 1 in 100 year event with an allowance for 40% climate change, unless discharge rates have been restricted to QBar'</i>.</p> <p>The section relating to this in the major development outline application drainage checklist has also been amended to match this.</p>
WokBC-LS13	<p>The local standard states a freeboard allowance for all surface water storage features. The respondent suggested rewording the standard as the amount of freeboard required may be dependent on the depth of water and depth of the feature especially where they are shallow features. An amendment has been made such that the local standard is as followed: <i>'All surface storage features (ponds, wetlands and basins) must provide a 300mm freeboard above the maximum design water level, unless otherwise agreed'</i>.</p>
WokBC-LS14	<p>The local standard relates to the requirement for a freeboard allowance for all surface conveyance features of 150mm and the respondent has indicated that the freeboard amount may be dependent on the depth of water and depth of the feature, especially in respect to very shallow systems. An amendment has been made such that the local standard is as followed: <i>'All surface conveyance features (swales and channels) must provide a 150mm freeboard above the maximum design water level, unless otherwise agreed'</i>.</p>
WokBC-LS17	<p>The local standard states that no overland flow/exceedance routes/storage areas shall be within private ownership and requests how these areas will be safeguarded. An amendment has been made such that the local standard is as followed: <i>'Overland flow/exceedance routes/storage areas should be outside private ownership areas unless otherwise avoidable'</i>.</p> <p>The section relating to this local standard in the major development full application drainage checklist has also been amended to match this.</p>
WokBC-LS22	<p>The local standard requires details of all structures or chambers in excess of 1m deep or 600mm diameter, or 600mm high to be submitted for approval with all structural calculations. The respondent states that it is already industry practice to specify components that have been designed, developed and tested to stringent criteria under European and/or British Standards but that some developments may require the use of non-standard components and therefore the policy should be directed at such elements rather than all structures or chambers in excess of these conditions. This point has been noted and the amended standard reads: <i>'All details of non-standard structures or chambers in excess of 1m deep or 600mm diameter, or 600mm high shall be submitted with structural design calculations relating to the ground conditions proven by site investigations'</i>.</p>
WokBC-LS39	<p>The local standard relates to the provision of guidance as to when pervious surfaces should be constructed. The respondent states that the wording is too prescriptive and could force a construction programme that may not be suitable with respect to Health and Safety and pedestrian/traffic movements. This point has been noted and an amendment has been made such that the local standard is as followed: <i>'Any pervious surfaces should not be constructed, unless adequate protection is provided to prevent clogging or binding once it has been constructed. The function of permeable systems will be destroyed if soil or subsoil is deposited on the surface and should be avoided'</i>.</p>

