



Improving Surface Water Drainage

Consultation to accompany proposals set out in the Government's Water Strategy, *Future Water*

Response from the Partnership for Urban South Hampshire (PUSH)

1. Introduction

PUSH has prepared the strategy for South Hampshire in the South East Plan. Among the many objectives of the strategy is the desire to ensure that all new development built within the sub-region is of high standards of sustainable design, having regard to the high quality of the sub-region's natural environment. It must also contribute to improving the existing environmental quality of its many urban and sub-urban areas. This objective has been translated into a clear spatial strategy, seen in policy SH14, with development targets for housing in terms of water use and drainage. The Partnership is committed to continued working with other stakeholders such as the Water Companies and the Environment Agency to assess the future capacity of the sub-regions' water environment, and gauge what needs to be done to sustainably accommodate future housing and population pressures. PUSH's approach was commended by the South East Plan's Panel report. PUSH's comments on the consultation into Improving Surface Water Drainage are based on this experience PUSH wish to make the following points on the consultation. The comments are grouped under various themes.

2. Overall Approach

PUSH welcomes the publication of the Government's new Water Strategy. The strategy recognises that surface water drainage is a key element within an integrated approach to water management. This is an approach that PUSH strongly endorses and so welcomes the publication of the consultation specifically related to Improving Surface Water Drainage.

The strategy puts forward three policy proposals in surface water management:

1. Establishing Surface Water Management Plans as a way of improving co-ordination of activities between stakeholders involved in surface water drainage,
2. Clarifying responsibilities for adoption and management of sustainable drainage systems,
3. Reviewing the automatic right to connect surface water drains or sewers to the public sewerage system.

PUSH strongly agrees that these are three key areas that need to be addressed and which can potentially aid the management of surface water in an integrated way.

3. Surface Water Management Plans

PUSH believes that Surface Water Management Plans have the potential to be a useful tool to manage and plan for drainage, but it must be within a framework that recognises that organisations will always have distinct obligations and responsibilities for dealing with water and sewerage. A framework approach that enables each authority to discharge its obligations, develop SWMPs relating to its business and set out clearly the defined responsibilities, is the most pragmatic approach. PUSH would endorse an overseeing 'body' (drainage board) and the designation of a lead organisation.

Surface Water Management Plans should be a requirement in all areas, with a risk assessment approach being part of the SWMP to identify the high risk locations. The strategy should then be developed on this basis. Clear leadership and steerage is required and it is important to ensure that the task of preparing the SWMP is managed in a systematic way to ensure that the key issues are identified and addressed at the appropriate stage.

PUSH would support the undertaking of SWMPs at a more strategic, sub-regional level, ideally in parallel with Strategic Flood Risk Assessments. Without doubt, Local Authorities have a key role but their boundaries do not match well with surface water catchment areas. As such it would be more appropriate to have a SWMP at a sub regional level with each Local Authority contributing to the bigger picture, thus allowing cross-boundary drainage issues to be captured. However, the complex division of responsibilities on critical watercourses and drainage between the EA, highway authorities and water companies needs to be reviewed.

PUSH is concerned that the cost estimates for preparing SWMPs are based on the assumption that knowledge of the asset is at a high level. This is unlikely to be the case and improving knowledge of the asset is likely to be a significant additional cost. PUSH would suggest that the additional cost may be distributed based on size of the asset to be managed and risk assessment outcomes as this will dictate the amount of work required by each partner body.

It is important that the SWMP must be linked to the wider asset management planning process and must set out the long term maintenance and renewal strategy. It needs to be linked to climate change issues, adaptation and resilience, water supply and storage and other elements of flooding such as the SFRA.

4. Sustainable Urban Drainage Systems

Implementation of Sustainable Urban Drainage Systems is a priority for PUSH in new development where it is feasible. This is set out in Policy SH14 of the strategy. PUSH recognises that to date, uncertainties over management and adoption of SUDS has made implementation 'uneasy' at best. Therefore PUSH strongly supports clarification on this matter, and welcomes the opportunity to voice its opinions.

PUSH considers that the property owner should have responsibility for SUDS within their own property, but that it is essential that this is regulated because owners may well look to alter and change these features, with a lack of understanding of their function, which could exacerbate future flooding issues. PUSH would suggest that a greater exercise of Land Drainage powers by Local Authorities and the Highway Authority would help regulate property level SUDS and ensure they remain effective.

PUSH would advocate that in many situations and especially for larger scale, greenfield development, local authorities may well be the most appropriate party to take responsibility for adoption and management of SUDS. Local authorities perform a civic amenity role, have permissive powers under the Land Drainage Act, and as the Planning Authority are best placed to manage SUDS in open space locations created as part of development proposals. SUDS within the highway network are also best managed as a highway feature by the Highways Authority. However in more densely populated urban locations and for infill development, adoption by the local authority may not be the best approach. In such locations attenuation of surface water drainage may best be achieved by underground tanks / chambers and in this situation the Water Authority would be best placed to adopt the system. There would be merit in reviewing the definition of what constitutes a sewer to enable a more flexible approach to adoption of SUDS by Water Authorities in appropriate circumstances.

It would be one role of the SWMP to clearly set out these responsibilities. One clear advantage in local authority management is that it could potentially add to the quality of service delivery in terms of place-making and ensuring high quality open spaces for the benefit of residents.

PUSH however would be concerned with the additional costs that management measures could bring, considering the already heavily stretched financial circumstances of many Local Authorities.

PUSH would also like to suggest that adaptation to Climate Change is an important issue that needs to be taken into account with a sound long term approach to design and management. In all SUDS schemes, sufficient land to provide long term certainty of SUDS performance should be considered.

5. Drainage of Surface Water to Public Sewerage System

As a partnership keen on implementing greater levels of SUDS within new development, PUSH is keen to endorse the view that section 106 of the Water Industry Act 1991, which gives the right to automatically connect surface water drains or sewers to the public sewerage system, should be amended. PUSH is of the opinion that removing this right will help promote the use of SUDS and help reduce flooding relating from extreme flows into the system. It is acknowledged that where existing surface water and foul-water systems are combined then there may be an exception subject to an assessment of risk and impact on the system capacity, but otherwise PUSH believes that surface water should not be connected to foul water systems for the reasons outlined in the consultation.



PUSH is an area that is going to experience significant in-fill/brownfield development. As such PUSH is firmly of the opinion that an impact assessment should be a pre-requisite of all infill development, with the first option always to manage surface water by attenuation, soakaways and SUDS type features rather than connecting to the existing surface water sewer network. As such PUSH would support option 3 as this will provide the strongest mandate.