

Drainage and Wastewater Management Planning

Strategic Context Stakeholder Consultation Feedback Template

Could you please submit your response by 5pm on Friday 15th November 2019 to either dwmp@severntrent.co.uk (Severn Trent) or dwmp@hdcymru.co.uk (Hafren Dyfrdwy).

Organisation	South Derbyshire District Council
Who in your organisation is the best person(s) for us to engage with, together with contact details, and which elements of the DWMP are they interested in? (if there are several departments within your organisation who would like to be involved with DWMPs could you please provide their details as appropriate)	<p>Kevin Exley (Planning Policy Officer) Kevin.exley@southderbyshire.gov.uk Local Plan, Growth, SUDS, drainage and infrastructure delivery</p> <p>Phil Lenton (Cultural Services Technician) Phil.lenton@southderbyshire.gov.uk SUDS design and management.</p>
What geographical areas of the DWMP are you interested in? (Are there any specific parts of our region you are particularly interested in?)	South Derbyshire District, Derby Housing Market Area

Question 1:

What means of communication do you think would work best for your organisation? Do you think this governance structure will meet your needs?

The proposed governance structure is noted. It is worth noting however that there is a grey area between 'delivery partners' and 'supporting partners'. and there is a greater need for collaboration/involvement with all stakeholders. For example whilst this Authority does not have any statutory obligation to adopt SuDS, as a matter of fact it does. And whilst at present the number adopted by SDDC is relatively limited, there may be potential for this and other Authorities to play a more significant role in managing SuDS in the future either directly or through the establishment of management companies. Moreover there may also be a benefit to consulting development companies and volume builders who increasingly construct SuDS associated will large developments as well as engage with developers in order that SUDS design and management can be influenced.

Question 2:

Do you understand the role your organisation can play in the development of DWMPs? Are there any other areas where DWMPs will help contribute to your long term aspirations?

It is considered that the need for STW to prepare a DWMP will assist this Authority in preparing its Local Plan. During the preparation of the previous Part 1 and 2 South Derbyshire Local Plan this Authority worked jointly with other LPAs in the Derby Housing Market Area and Severn Trent to understand how development would affect local sewerage and drainage capacity; the need to deliver investment in the water network; the environmental capacity of watercourses to accommodate further (treated) foul flows, and the need to support the actions of the water companies in balancing demand and supply of water. Clearly these are all issues which will be addressed within the DWMP and this will reduce the burden on Local Authorities to commission further evidence to inform development decisions through the procurement of water cycle or other similar studies as previously had been the case. Moreover this wider approach to planning will also provide longer term certainty regarding the challenges of managing drainage and will in a single location provide detailed evidence which can underpin decision making. Clearly however for such evidence to be useful the Council will look to proactively engage Severn Trent Water early in the Plan making process and decisions will need to be informed by the evidence gathered.

In addition to strategic planning the Council also has a role in the delivery and management of SuDS, the DWMP could help inform the design of SuDS through providing a policy steer on the design and appropriateness of SuDS across different areas or catchments reflecting local drainage issues and environmental constraints.

Question 3:

Do you think there are any other drivers that need to be considered in the development of 25 year DWMP catchment plans?

SDDC has ongoing concerns regarding the reluctance of LLFAs and water companies in adopting and maintaining SuDS features. By definition these features often require more management than grey infrastructure but water companies, and other stakeholders supporting the use of SuDS need to take a more open approach to adopting and maintaining these features if they are to become a useful and effective mechanism to controlling flood risk at the site level or beyond.

Whilst SuDS is a useful mechanism for dealing with surface water on new development sites far greater emphasis could also be placed on supporting grey water use or rainwater harvesting , particularly in respect of large commercial or public building projects. This would not only intercept rainwater ensuring water is held on site but would also have wider benefits of reducing demand for potable water (which is likely to be more constrained in the future) but could also reduce outflows to the combined sewer network in some locations.

Question 4:

Based on the proposed planning areas, what do you think is the most appropriate way of engaging with your organisation? If you have regional areas are you able to provide contact details.

No Comments

Question 5:

What do you think would be the best format/platform to share DWMP findings? Would a paper based reporting process be useful or would you find a web based interactive portal easier to us?

It is noted that STW is exploring how best to publish and share results from the DWMP. In the view of officers it would be best to use a web based interactive portal (an option suggested by STW), however it would also be useful to engage directly with authorities through a face to face meeting. Whilst it is accepted this could be an onerous task if it was necessary to visit authorities individually, workshops could be established to meet authorities at a HMA or sub regional level. This would allow officers involved in plan making to understand fully the issues affecting their area and enable more effective decision making.

Question 6:

Do you think the seven Planning Objectives outlined above are the appropriate? Do you think there should there should

be additional objectives?

Whilst the scope of the planning objectives is broadly supported it is considered that Severn Trent has a greater role in delivering SuDS. Supporting the drafting and implementation of SuDS policies through local plans is important, however presently the effectiveness of these can be undermined by the lack of a coordinated approach to long term management. Greater emphasis should be placed on the need to adopt and manage SuDS and water companies could play a leading role in improving the quality of SuDS by taking a positive role, both in informing their design through the development management process and in their management post development.

Question 7:

Do you agree with the challenges? Are there any other aspects that a DWMP should consider?

The Council agrees with the challenges identified, although would point out that further challenges and opportunities could arise as a result of policy and regulatory change outside of the water industry. Already the Government is consulting on the need to tighten water efficiency standards and future support through building regulations or planning regimes for rainwater harvesting or grey water recycling. Whilst it is unclear if tighter standards would apply to existing dwellings (for example if a householder seeks an extension to a property), there is potential for such requirements to further drive water efficiency and reduce pressure on the sewerage/drainage infrastructure.

Question 8:

Given that DWMPs are looking at a 25 year planning horizon, what challenges can you foresee within your organisation that could development of catchment strategies and what options are available to overcome future uncertainties.

No Comments

Question 9:

We are interested to understand what data and planning tools your organisation may have which could help with the delivery of DWMPs? If you could let us know what information is available that would be welcomed. We appreciate that some of this information might be sensitive and so we would like to understand what restrictions would be placed on its access and any limitations on its use.

Whilst Local Authorities may lack the technical information and modelling tools of STW all Local Planning Authorities are required to identify potential development sites for future use. And whilst it is the case that Local Plans only extend 10-25 years as STW note, it is the case the most LPAs have a good understanding of where future potential sites are located because typically they will have received submissions through a call for sites process which identifies all land available for development. This coupled with wider local knowledge and an understanding of national policy requirements provides a good level of knowledge of the likely broad location of future sites, even if specific sites may not be known. STW should therefore consider reviewing sites submitted through the SHLAA/SHELAA process as this will provide a reasonable understanding of where development pressure and future potential sites fall.

Question 10:

Do you have any further comments or observations which you think will help to agree the Strategic Context or delivery of DWMPs by June 2022?

No Comments