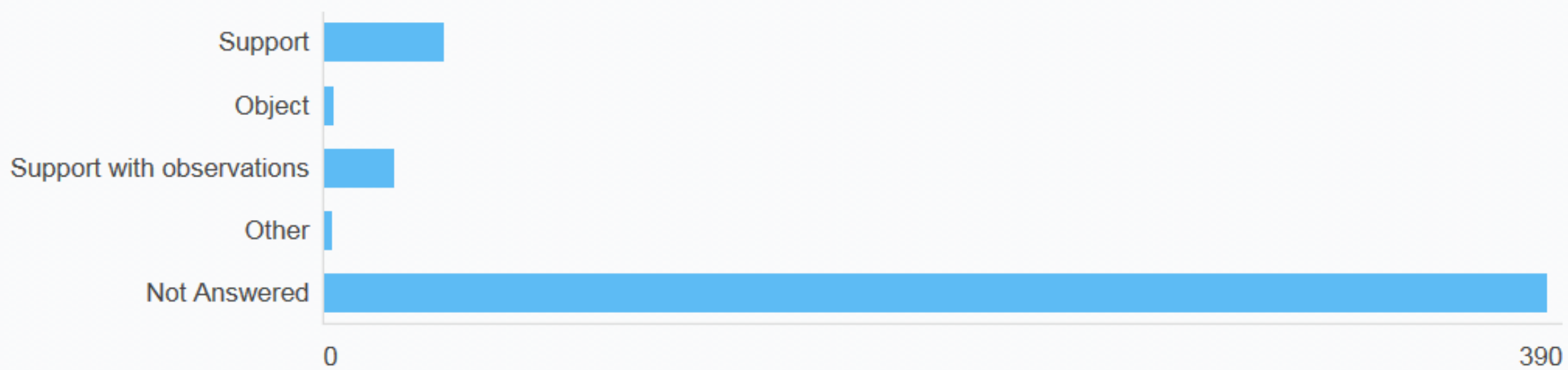


Policy EN12 – Sustainable Urban Drainage Systems



Option	Total	Percent of All
Support	<u>38</u>	8.352%
Object	<u>3</u>	0.6593%
Support with observations	<u>22</u>	4.835%
Other	<u>2</u>	0.4396%
Not Answered	390	85.71%

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Name	User ID	Support/Object	Issue or Comment	What changes would you like to see made to this policy?	Officer Response	Proposed Amendment
Robert Ian Lockey	ANON-BHRP-4H3G-2	Support with observations		Omit 'green roofs'. Yet another cost limiting the affordability of houses.	The reference to green roofs is not a requirement.	
Angus Smith	ANON-BHRP-4HZK-D	Support	Support fully the above principles	None other than make it more mandatory rather than reading as "optional"	SuDS are mandatory, unless not technically feasible in a proposal. The Flood and Water Management Act 2010 removed the automatic right to connect to public sewers.	
Mr John Brown	ANON-BHRP-4H4Z-P	Support with observations	What about the recycling/re-use of this water?	See above.	This is covered by Policy EN9	
Aidan Thatcher	ANON-BHRP-4HEA-E	Object	The policy says that all developments will be expected to achieve a net decrease in surface water run off. This goes too far, primary legislation confirms that new development should not have a higher level of surface water run off, not that it should be decreased.	The requirement to decrease surface water run off should be removed and replaced with a requirement not to increase surface water run off.	The policy states a decrease in run-off rates is required “where appropriate”. This would include instances where surface water flooding is currently an issue.	
Mark Colin Marlow	ANON-BHRP-4HEJ-Q	Support with observations	Totally agree	Developers should be expected to provide specific third party evidence regarding drainage solutions.	The LLFA is consulted on surface water drainage strategies for proposals.	
Anthony Thomas	ANON-BHRP-4HFX-6	Support with observations		An independent fully insured (to £25M+) specialist flood management or surveyors comprehensive report and scheme design. This to be required before any Planning permission is granted.	A site-specific flood risk assessment is required for applications in Flood Zones 2 and 3 and for sites which exceed 1 hectare in Flood Zone 1.	
Susan Love	ANON-BHRP-4HZP-J	Support with observations	The Barratt's estate on Belvoir rd does not mimic the natural drainage pattern. Part of this area would have drained to the north of the site. All the water has been channelled to the south to the minor watercourse of the Winterbeck. The developers even show an astonishing lack of knowledge as to which way the river flows channelling it angled upstream just in front of the small Belvoir Rd bridge arch under which this water must flow.		Policies EN11 and EN12 seek to reduce the risk of flooding from new development and the Environment Agency (if necessary) and Lead Local Flood Authority are consulted on proposals.	
Emily Aron	ANON-BHRP-4HMN-3	Support with observations	This policy should require or encourage ecologically valuable sustainable drainage options, i.e. ponds that hold at least some permanent water and wetlands rather than just underground storage or detention basins.	Require or at the very least encourage ecologically valuable sustainable drainage solutions	Noted.	Amend policy to encourage the creation of wetlands near watercourses.
Mr & Mrs J. Rogan	ANON-BHRP-4HMH-W	Support with observations	There is also a need to ensure that development has the potential to accommodate enhanced water management solutions to protect existing communities eg. the protection or extension of	as above.		Amend policy to encourage the creation of wetlands near watercourses.

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			washlands to increase effective capacity during flooding or high rainfall events.			
Environment Agency	ANON-BHRP-4HFU-3	Support with observations	We have requested changes to the Policy.	Change the title of the Policy to "Sustainable Drainage Systems" as these types of systems are not just applicable to the urban area. We advise that SuDS, especially well designed ponds and wetlands, can enhance a river or stream corridor. We would therefore advise the policy highlights this and encourages the creation of wet habitats and natural flood risk management process to help manage flood risk. The type of habitats which may be acceptable near to watercourses could include, for example, floodplain grazing marsh, floodplain meadows, wet woodland and ephemeral and permanent ponds.	Noted.	Amend Policy title to "Sustainable Urban -Drainage Systems" Amend policy as suggested with regards to wetlands near watercourses.
Moira Hart	ANON-BHRP-4HU7-M	Support with observations	All properties and all sites should need to demonstrate that they have sustainable drainage, even individual properties can install holding systems to regulate the outflow of water from the site. The policy should not be restricted to "major developments" and "allocated sites" as noted here. A comprehensive flood report has been prepared for Long Clawson and will form part of our Neighbourhood Plan.	The policy should apply to ALL sites, including individual properties. There are methods of containing surface water onsite and allowing it to drain slowly. The restriction of the policy to major developments and allocated sites is flawed. The building of infill and small developments actually have a cumulative effect that this policy does not address.	Currently it is a requirement for major developments to submit a surface water drainage strategy. This does not currently extend to minor developments. Policy will be strengthened as per proposed amendment.	Policy amended: <u>"All developments on greenfield sites will be expected to achieve greenfield run-off rates."</u>
CHRISTINE LARSON	ANON-BHRP-4HUU-J	Support with observations	Note this should be entitled "Sustainable Drainage Systems" urban was dropped from the designation some time ago. All properties and all sites should need to demonstrate that they have sustainable drainage, even individual properties can install holding systems to regulate the outflow of water from the site. The policy should not be restricted to "major developments" and "allocated sites" as noted here. The building of infill and small developments have a cumulative effect that this policy does not address.	The policy should apply to all sites, including individual properties. There are methods of containing surface water onsite and allowing it to drain slowly. The policy should be applied to all sites and the restriction to only be applied to major developments and allocated sites removed. Change Policy EN9 - ensure new homes provide underground grey water tanks as well as SDS, instead of water butts.	Noted. Currently it is a requirement for major developments to submit a surface water drainage strategy. This does not currently extend to minor developments. See proposed amendments to Policy EN9 regarding grey water.	Amend Policy title to "Sustainable Urban -Drainage Systems"

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			Under Policy EN9 the Council should consider developers creating underground grey water tanks as well as SDS as is done in Germany. All new property can easily be built with grey water systems for watering gardens and flushing toilets.			
Clawson in Action - residents' group set up to Keep Clawson Long and Rural and working to support the production of a Long Clawson Neighbourhood Plan	ANON-BHRP-4HBM-Q	Support with observations	Note this should be entitled “Sustainable Drainage Systems”. Urban was dropped from the designation some time ago. All properties and all sites should need to demonstrate that they have sustainable drainage, even individual properties can install holding systems to regulate the outflow of water from the site. The policy should not be restricted to “major developments” and “allocated sites” as noted here. Specific to Long Clawson – Although large sites are required to have a SuDS system in place, this should not be used to build within catchment areas of the two culverts in the village. Only sites where the SuDS failure would not cause flooding to other residents and only act as a fail safe and not be essential to the prevention of flooding elsewhere should be allowed.	The policy should apply to all sites, including individual properties. There are methods of containing surface water onsite and allowing it to drain slowly. The restriction of the policy to major developments and allocated sites is flawed. The building of infill and small developments have a cumulative effect that this policy does not address.	Currently it is a requirement for major developments to submit a surface water drainage strategy. This does not currently extend to minor developments. Policy will be strengthened as per proposed amendment.	Policy amended: <u>“All developments on greenfield sites will be expected to achieve greenfield run-off rates.”</u>
Deborah Caroline Adams	ANON-BHRP-4H38-K	Other	Unfortunately time and again SUDs are located in an unsuitable position on a new development. The obvious position should be at the lowest points on the sites and yet so often SUDs are located according to where it is thought it will LOOK best not where it will be MOST PRACTICAL. Who is responsible for maintaining the SUDs and will they be maintained in the years to come? If it is like culverts under a road, no-one will accept responsibility for their maintenance and so they get blocked e.g. Melton Spinney Road.	SUDs should be placed wherever they will be of most use, and there should be clear guidelines as to whose responsibility it is to maintain them in the years and decades to come.	Policy EN11 (4) requires the maintenance of SuDS to be considered. Planning conditions will set out who is responsible for the long-term management of SuDS.	

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Shelagh Woollard	ANON-BHRP-4HB5-Y	Support with observations	"Green roof" use is only of any consequence where inhabitants have horticultural knowledge.			
Anthony Woollard	ANON-BHRP-4H6F-4	Support		Non-permeable areas, apart from driveways, should be banned	Policy EN12 can encourage but not cannot require non-permeable surfaces, however it may be necessary to use non-permeable surface in a scheme to achieve the required run-off rates. See policy amendment.	Policy amended: <u>"All developments on greenfield sites will be expected to achieve greenfield run-off rates."</u>
Clair Ingham	ANON-BHRP-4HMZ-F	Support	Drainage is important to protect developments from floods	None	Noted.	
Melanie Steadman	ANON-BHRP-4HFE-K	Object	Not comprehensive enough. Permeable areas are useless where the strata is underlying clay as is the case across the Vale. SuDS should also be able to take the run off going through the site, which they do not appear to do. As a clay based environment, most of the land in the Vale becomes bogged very quickly. As MBC are likely to adopt the maintenance of these systems, they should not be the only means of preventing flooding further down a watercourse on already critical systems. Preference for sites where the SuDS will act as a fail-safe device instead of critical to prevent flooding for others.	If it can't show a net decrease in water run off, don't allow it. If the flooding of other areas is dependent on the functioning of these SuDS systems, don't allow it - find alternative sites that are not completely dependent on the maintenance of these systems to prevent flooding for others.	Note policy amendment for EN11: 4. Incorporates Sustainable Urban Drainage Systems and considers their ongoing maintenance unless they are demonstrated to be impractical <u>not technically feasible</u> .	
Bottesford Parish Neighbourhood Plan Steering Group	ANON-BHRP-4HUB-Y	Support with observations		SUDs only compensates for the built area and does not deal with flooding from an external source. We must not be tempted to build in flood areas and be convinced that SUDs is a cure-all.	Noted.	
Richard Simon	ANON-BHRP-4HZC-5	Support with observations		SUDs only compensates for the built area and does not deal with flooding from an external source. We must not be tempted to build in flood areas and be convinced that SUDs is a cure-all because it is not. SUDs must be well designed into the scheme from the outset and its appearance should be natural and in keeping, Ugly concrete cisterns should not be permitted.	Note policy amendment.	Amend policy as suggested by the EA (below) with regards to wetlands near watercourses. "We advise that SuDS, especially well designed ponds and wetlands, can enhance a river or stream corridor. We would therefore advise the policy highlights this and encourages the creation of wet habitats and natural flood risk management process to

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						help manage flood risk. The type of habitats which may be acceptable near to watercourses could include, for example, floodplain grazing marsh, floodplain meadows, wet woodland and ephemeral and permanent ponds.”
Bottesford Parish Council	ANON-BHRP-4H1W-G	Support with observations		SUDs only compensates for the built area and does not deal with flooding from an external source. We must not be tempted to build in flood areas and be convinced that SUDs is a cure-all.	Noted.	
JOHN RUST	ANON-BHRP-4HUV-K	Support with observations	Note this should be entitled “Sustainable Drainage Systems” urban was dropped from the designation some time ago. All properties and all sites should need to demonstrate that they have sustainable drainage, even individual properties can install holding systems to regulate the outflow of water from the site. The policy should not be restricted to “major developments” and “allocated sites” as noted here. Under Policy EN9 the Council should consider developers creating underground grey water tanks as well as SDS as is done in Germany. All new property can easily be built with grey water systems for watering gardens and flushing toilets.	The policy should apply to all sites, including individual properties. There are methods of containing surface water onsite and allowing it to drain slowly. The restriction of the policy to major developments and allocated sites is flawed. The building of infill and small developments have a cumulative effect that this policy does not address. The policy should apply to all sites, including individual properties. There are methods of containing surface water onsite and allowing it to drain slowly. The policy should be applied to all sites and the restriction to only be applied to major developments and allocated sites removed. Change Policy EN9 - ensure new homes provide underground grey water tanks as well as SDS, instead of water butts.	Currently it is a requirement for major developments to submit a surface water drainage strategy. This does not currently extend to minor developments. See proposed amendments to Policy EN9 regarding grey water.	Amend Policy title to "Sustainable Urban Drainage Systems"
Sharon Gustard	ANON-BHRP-4H6K-9	Other	For allocated sites, any surface water management strategy should demonstrate how site-specific guidance in the strategic flood risk assessment has been implemented. This information should be available for public scrutiny before a development is approved on an allocated site not once it has been implemented. Guarantees should be made available to current residents and terms built into the contracts of any building plans to secure the	Guarantees should be made available to current residents and terms built into the contracts of any building plans to secure the livelihoods and homes of current residents.	The SFRA is a publicly available document on the Council’s website.	

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			livelihoods and homes of current residents.			
Wymondham and Edmondthorpe Neighbourhood Plan Committee	ANON-BHRP-4HBD-E	Support	This will be crucial for Wymondham in relation to the proposed development of MBC/070/13 which is a site which has significant water run off causing significant seasonal flooding in the village		Noted	
Colin Love	ANON-BHRP-4HBR-V	Support	Who defines the 'minimum' in the creation of non-permeable areas? In the intro you say ' that properties will not be at risk,,, ' But which properties? It should also confirm the existing properties, not only new builds, should be guaranteed protection.	See above	The planning officer dealing with each application will make a professional judgment on whether the proposal keeps impermeable surface to a minimum or not. The LLFA is consulted on major development which can inform such a judgment. 'Properties' refers to all properties.	
Alan and Heather Woodhouse	ANON-BHRP-4HMQ-6	Support with observations	The adequacy of drainage systems and flood prevention is particularly significant in Long Clawson, where existing infrastructure appears to be inadequate and ill-maintained.	No further comment	Noted.	
Mick Jones	ANON-BHRP-4H6N-C	Support with observations	Either the development will conform or it will not!!	Remove the ambiguity.	The LLFA must be satisfied that the surface water drainage strategy is effective.	
Waltham on the Wolds & Thorpe Arnold Parish Council and Neighbourhood Planning Group	ANON-BHRP-4HBZ-4	Support with observations	See response to EN 8.	As above.	Noted.	
Kerstin Hartmann	ANON-BHRP-4HGW-6	Object	Ss we have some experience with SUDS in a flood risk area in Somerby and are experiencing an increase of flood levels I am not confident about the use of SUDS being of benefit! Springs are completely ignored in the flood risk assessments, also is climate change leading to areas previously flooded once in a while being flooded now several times a year. A cumulative result from all of above mentioned points. The standard flood risk assessment from LCC is not longer fit for purpose as every new development is shifting and creating problems elsewhere - Birstall is the prime example for this.	see above	The SFRA is being updated to take account of the new climate change assumptions from the EA.	
Anthony Barber	ANON-BHRP-	Support with observations	Where allocated sites in villages are elevated, development should only be allowed provided existing drains/sewers in the existing village has the		Note policy amendment to EN11 as per Anglian Water comment:	

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	4H6R-G		capacity and can take the additional load.		Amend policy to require applicants to demonstrate that the capacity of the foul sewerage network has been considered in proposals.	
Anglian Water Services Limited	BHLF-BHRP-4H83-K	Support with observations		Anglian Water welcomes the reference made to the inclusion of Sustainable Drainage Systems (SuDs) as part of major developments. It would be helpful if policy EN12 could include reference to applicants providing evidence to the Council that a surface water connection to a public surface water sewer is required due to other options not being feasible.	Noted.	Amend policy such that applicants are required to provide evidence when SuDS are not technically feasible.
Natural England	BHLF-BHRP-4HA7-Z	Support	We welcome Policy EN12 encouraging the use of Sustainable Urban Drainage Systems to manage surface water runoff.		Noted.	