

# Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

## Surface Water Drainage Consultation

Defra  
Ergon House  
Area 2D  
Horseferry Road  
London, SW1P 2AL.

Dear Surface Water Drainage Consultation Team,

Thank you for giving the Salmon & Trout Association the opportunity to respond to the consultation document: 'Improving Surface Water Drainage'.

The Salmon & Trout Association (S&TA), which was recently awarded charitable status due to our work concerning fish stock management and aquatic conservation, has over 100,000 individual and club members. We represent the public interest over issues relevant to the management and conservation of water, the aquatic environment and all its dependent species.

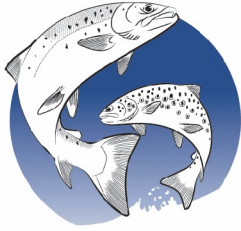
We support the objectives in this consultation; to manage surface water runoff more effectively in order to reduce the threat of flooding and to reduce pollutants reaching our watercourses. We feel that, in order to achieve sustainable surface water management, it will require new constraints and limitations on anthropogenic development. We urge the Government to address current surface water management issues before sanctioning further large scale residential development.

This consultation predominantly focuses on urban problems and particularly new development. We agree these are very important issues which need to be addressed, but we feel land management issues should also be considered in surface water management plans. Poor land management practises (including poor cultivation techniques, pasture management, agricultural drainage and forestry practises) can increase the rate and speed of run-off reaching our rivers. It can also lead to surface soil layers becoming compacted, unstable and impermeable to rain. Good soil management can significantly increase the volume of rain water being absorbed into the ground, thus reducing the speed and the volume of run-off, and subsequent flood threat. Addressing surface water drainage issues associated with poor land management would also help address a magnitude of other environmental issues, such as diffuse pollution and sediment being brought into watercourses with surface water runoff.

The more severe flooding that we are now experiencing is likely to be the cumulative result of poor land management, increased hard urban surfaces, poor drainage schemes, expanding populations resulting in greater development in floodplains, and climate change. We therefore feel surface water management plans should include actions to address all these issues.

The S&TA strongly supports the suggestion in the Pitt Interim Report, to increase wetland creation/restoration to aid flood defence and water storage issues. Wetlands play a critical role in the water cycle by reducing and delaying floods, whilst delivering a multitude of other environmental benefits. Restoring the natural function of floodplains and their connectivity with lotic systems will help reduce flooding threat, whilst enhancing biodiversity and water quality.

Our responses to the individual questions set out in the consultation, appropriate for S&TA comment are as follows;



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## Part 2: Surface Water Management Plans

The S&TA agrees with the main principles set out for Surface Water Management Plans; to minimise surface water impacts on development, and for investment into drainage strategies to eliminate the need for end-of-pipe solutions. We feel there should be authority to direct local planning decisions by specifically prohibiting development which can clearly present a flooding risk, either within the development itself or elsewhere, and reduce the development of impermeable surfaces.

### **Q2. Could the principles set out in Surface Water Management Plans be delivered through a voluntary arrangement? Or should producing such plans be a requirement in critical drainage areas?**

We feel that the surface water management plan is too complex a matter to be dealt with by voluntary means. The S&TA believes an authoritative voice is needed, with understanding of the technicalities of the subject, and supported by appropriate regulation to ensure sustainable and responsible development and surface water management.

### **Q5. Do you think that local authorities are the appropriate body to take the lead on producing a Surface Water Management Plan?**

We feel that, while local Authorities have a role to play in surface management plans, they do not currently have the required expertise to take the lead on drainage issues.

### **Q9. Do you agree that the EA would be well placed to play an advisory and/or regulatory role in producing and implementing Surface Water Management Plans? Are existing powers and duties sufficient to achieve this role? Are there other organisations that could provide the quality assurance role?**

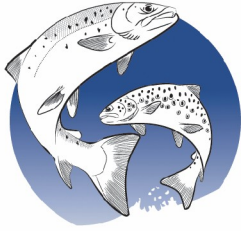
We believe that the EA is well placed to play a regulatory role in producing and implementing surface water management plans, and ensuring environmental sustainability is upheld. Flooding is, after all, an environmental matter, and surface water management is a logical and necessary progression to the EA's remit to reduce flood threat.

The EA, as the controlling authority, should have the ability to direct planning decisions to ensure that no new development is allowed unless sustainable drainage arrangements can be guaranteed or it can be shown that connection to existing surface water sewers would not create flooding complications elsewhere in the system.

## Part 3: Sustainable Drainage Systems (SUDS)

SUDS, in theory, are a desirable answer to surface water drainage problems associated with new developments, and in tackling urban surface run-off pollutants. However, we are concerned over who will have the responsibility of maintenance, and from where the required funding will come. We fear that, without successful maintenance and operation, SUDS could, at worst case, become a cause of future flooding. The S&TA does not feel that we are in a suitable position to comment on who should be made responsible for SUDS.

We strongly support the role of regional control of SUDS but, wherever possible, using wetland and balancing lakes which are likely to introduce fewer maintenance problems than other features such as swales, infiltration trenches etc. Their creation would not only provide primary flood defence by increasing flood storage capacity and evening out flow regimes, but would also have the ability to deliver a wide range of other key functions, including nutrient



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and carbon storage, and soil stabilisation, whilst improving biodiversity and water quality. We feel that the development of balancing ponds could be particularly important in managing highway drainage, where percolation into the underlying soil is impracticable. This would also provide settlement and encourage self-purification of highway pollutants that would otherwise flow directly into watercourses.

**Q34. What are your comments and views on the above good practise guidance and their role in ensuring that SUDS can be implemented in redevelopment schemes and can contribute effectively to making existing sewerage systems more sustainable?**

We feel SUDS are more obviously appropriate to new developments. For existing development already served by sewers of sometimes inadequate capacity, introduction of SUDS becomes more difficult, but where it is possible it will help to reduce the load on existing sewers. We feel there may be scope for some interception of existing surface water sewers to divert part of the flow elsewhere, to where it can be adequately controlled and balanced, and to reduce the problem of combined sewer overflows.

#### **Part 4. Drainage of Surface Water to the Public Sewerage System**

**Q41. Do you agree that the ability automatically to connect surface water drainage from premises under section 106 of the Water Industry Act 1991 should be amended? If you do not, please give reasons.**

The S&TA feels that, with all the problems surrounding urban drainage, a fundamental change must take place. We would like to see this section amended so as to forbid connection, unless it can be shown that adequate surplus capacity exists. We feel this should be a planning issue, with the EA having the power to direct planning decisions, based on the ability of the development to achieve sustainable surface water disposal.

We agree that, in future, all drainage arrangements should be on a completely separate system, e.g. foul sewers for foul sewage only, with no surface water drained into foul sewers.

#### **Summary**

The S&TA support the need for Surface Water Management Plans. We feel management plans should include controls of surface water from agricultural and similar land. We feel the EA, provided with the necessary resources, should be the controlling authority, with the ability to direct planning policy. SUDS should be encouraged wherever maintenance arrangements can be adequately assured, and we feel balancing lakes should be used wherever appropriate.