



Statement of Consultation for the Sustainable Drainage (SUDS) Design and Evaluation Supplementary Planning Document (SPD) February 2020

1 Introduction

- 1.1 This document sets out how the London Borough of Merton complied with the consultation requirements of Merton's Statement of Community Involvement (SCI) (2006) and the Regulations (The Town and Country Planning (Local Developments) (England) (Amended) Regulations 2012) for the Sustainable Drainage (SUDS) Design and Evaluation Supplementary Planning Document (SPD), known as the SUDS SPD.
- 1.2 Regulation 22 of the Town and Country Planning (Local Development) England) (Amended) Regulation 2012 requires local authorities to prepare a Statement of Consultation setting out:
- i. Which bodies and persons the local planning authority were invited to make representations under the Regulation
 - ii. How those bodies and persons were invited to make representations under either of those regulations
 - iii. A summary of the main issues raised by the representations made pursuant to either of those regulation, and
 - iv. How any representation made pursuant to either of those regulations have been taken into account

2 Merton's Statement of Consultation (SCI)

- 2.1 Merton's SCI was adopted in 2006 and describes how the community can be involved in the preparation of planning development documents. In 2019, the Council engaged with the public on the new SCI, this document is expected to be adopted in spring 2020. The SCI is part of Merton's ¹Local Plan and sets out the council's commitment to community involvement in planning. Its explains how Merton's local community, residents groups/association/organisations, stakeholders, and other interested parties can be involved in developing planning documents, by informing the council what they think of a plan/strategy, provide additional information and suggest changes to the a plan/strategy.
- 2.2 Some of the engagement tools set out in the SCI has changed since its adoption in 2006. For example the council now has a Facebook and Twitter pages which is used as an additional method of alerting communities to new press releases on a range of topics including council's consultations. Furthermore the council no longer has a dedicated community engagement officer for planning matters. However in spite of not having a dedicated officer, all officers are now involved in

¹ The Local Plan is a plan for the future development of the local area, drawn up by the Local Planning Authority. It guides decisions on whether or not planning applications can be granted. In law it is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004

plan making process actively take part in and conduct outreach engagements events with the local community and other interested parties. These changes are not considered to be significant changes to the principles of Merton's SCI.

2.3 This statement reports on:

- The engagement methods used during the Sustainable Drainage (SUDS) Design and Evaluation Supplementary Planning Document (SPD)
- The feedback receive
- The council's response following this feedback.

3 How we consulted – consultation methods

1.3 During the consultation the council used different methods of public engagement to maximise public involvement and raise public awareness of the consultation. A survey was conducted using Survey Monkey, the reason being it is a user friendly, recognisable and trusted. As well as Survey Monkey other consultation methods used for the consultation were:

- Paper copies of the planning guidance and its supporting documents were made available at Merton's reference libraries
- Posters displayed at Merton's at libraries
- Dedicated webpage with copies of the guidance and supporting documents
- Consultation details tweeted on Merton's Twitter account and information on the council's Facebook page by Merton's Communication team
- Consultation information was placed on the council's website home page
- Formal written consultation letters and emails sent to local residents, businesses, residential groups/organisations, environmental stake holders e.g. Environment Agency and other interested parties

4 Consultation responses

1.4 The following section gives a summary of the response received. All individual responses can be found on the council's website via web link. A total of 4 responses were received.

5 How the council considered the submitted responses

- 1.5 The council consider all responses received. In considering and deciding whether to take aboard comments and make changes the council had to consider the following:
- Is the proposed change in accordance with planning policy and guidance?
 - Would the proposed change exceed Merton’s Local Plan policies?
 - Is the comment in the context of the SPD and not related to other matters outside or not within the scope of the SPD for example submitted planning applications?

1.6 All comments received were assessed against the above and the appropriate changes to the SPD were made accordingly.

Figure 1: Responses received summary and Merton Council’s response

Company/Residents Group/Community Organisation	Comment received (extracts)	Merton Council response
The Wimbledon Society	<i>We consider that whilst a lengthy document may be necessary to cover all the intended guidance, there is a risk that the detail will overcome the message. Accordingly, we suggest that the final version incorporate a one-page summary at the beginning of the document for ease of reference and understanding with, of course, cross references to the detail that follows.</i>	We welcome the response from the Wimbledon Society. Due to the nature of the topic it would be difficult to provide a one page summary as the topic is huge and has many components to it. The first chapter of the document provides a less technical, read

		friendlier introduction to the subject of SUDS.
Historic England	<p>Generally supportive of the SPD but provided the following comments:</p> <p><i>The draft SPD could be more clearly indemnify the historic environment s as a factor affecting site conditions and highlight the SuDS design should be respond appropriately. We note that this is referred to in passing on page 59 of the document but we suggest that the SPD would be improved if this were incorporated into one of the design principles already outlined at the start of the document.</i></p> <p><i>For example, section 4 of the SPD relates to the multifunction nature of SuDS measures, one of these multifunctional benefits could be the potential, through the use of appropriately designed and detailed SuDS schemes, to improve or enhance the setting of heritage assets such as listed buildings or conservation areas. Equally it is important that the document acknowledges that historic building, for example, can be damaged by some types of flood mitigation measures or some types of standardised components and so often need a tailored approach.</i></p> <p><i>It is also recommended that the potential impacts upon the historic environment, as well as upon the wider character and appearance of an area, is recognised within the context of maintenance. The maintenance and management of SuDS systems will be pertinent if SuDS are to continue to provide positive impact for the historic environment</i></p>	We welcome the support of Historic England have incorporated Historic England' valuable comments and suggestions into the final SCI, where appropriate.

	<i>in the long term.</i>	
Thames Water	<p>Overall the guidance document is very good; easy to follow, very thorough and covers all SuDS types. However it seems to lack as much detail on rainwater harvesting as a means of surface water management (in comparison to the detail provided on other SuDS features which would be considered further down the drainage hierarchy, as per the London Plan). We recommend that the document provide more guidance on how to successfully install rainwater harvesting and demonstrate that it can be viable.</p> <p>Page 17 – Section 5.1 para 4: <i>The LPA/LLFA may choose to consult Thames Water, as a non-statutory consultee.</i></p> <p>Section 5.2 para 1: <i>Thames Water should be listed in this paragraph. E.g. “...the planner, LLFA, Thames Water and all other parties...”</i></p> <p>Page 25: <i>Would stress the importance of providing Concept Design at pre-app stage from a Thames Water perspective as it enables early discussion with us in terms of available capacity in the receiving sewer network (particularly combined sewers).</i></p> <p>Page 49 Section 7.5.1 para 3: <i>Would also include Thames Water in the paragraph ‘Constructive discussion between...’</i></p> <p><i>Suggest providing a link to Thames Water Pre-Development enquiry webpage here https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity</i></p> <p>Page 57 Section 8.0 para 1: <i>Include Thames Water in opening paragraph, as SuDS design may be dependent on receiving sewer capacity.</i></p> <p>Page 72 Section 9.3.3 bullet 5: <i>Separate bullet point for discharge consent to public sewer and expand bullet point by including info on connections process or by simply providing the below link to our webpage on connections</i></p>	<p>We welcome the support of Thames Water. We have taken on board Thames Water’s comments throughout the document and welcome their supportive words.</p> <p>We have:</p> <ul style="list-style-type: none"> • Replaced reference to sewer company with Thames Water, for consistency of approach • Included rainwater harvesting as a measure to reduce the demand on sewer capacity and clean water supply network. • Included encouraging words to support

	<p><i>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SUDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require regular maintenance to ensure their effectiveness</i></p> <p><i>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</i></p> <p><i>SUDS not only help to mitigate flooding, they can also help to:</i></p> <ul style="list-style-type: none"> <i>• improve water quality</i> <i>• provide opportunities for water efficiency</i> <i>• provide enhanced landscape and visual features</i> <i>• support wildlife and provide amenity and recreational benefits</i> <p><i>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the new Local Plan: “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</i></p>	<p>early consultation with Thames Water before planning applications, through the either the pre-planning process/conceptual design.</p> <p>We welcome the useful comments regarding Merton’s new local plan and will continue to engage with Thames Water on the Local Plan.</p>
<p>Natural England</p>	<p>Supportive of the SPD.</p>	<p>We welcome the support of Natural England - no changes required.</p>

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