

Central Bedfordshire Sustainable Drainage Guidance – Table of key Public Consultation Comments and Responses

Who made the comment	The Comment	Action/Response
Bedford Group of Drainage Boards (John Oldfield)	Does not cover the flood risk partners in the flood risk section and also flood risk seems too far down the list of priorities. 1.10. (flood risk)	Flood risk section has been added to with the Bedford Group of IDBs included.
Bedford Group of Drainage Boards (John Oldfield)	Missed opportunities to emphasise the need for maintenance access. Images need to highlight the need for access for maintenance.	Ease of access and maintenance is included as one of the local requirements. Emphasis and images have been added to the beginning of the design chapter, e.g. p31, where the difference between accessible and inaccessible features is noted, with the approach that the SAB would not adopt inaccessible features. A photo on p35 has been included to illustrate appropriate access for maintenance. Some thumbnail images (e.g. pp 50-52) are intended to be illustrative and are not intended to demonstrate all features of SuDS design, so have not been amended.
Bedford Group of Drainage Boards (John Oldfield)	Section Three, Chapter Four makes no reference to the Marston Vale Surface Waters Plan, nor does it align with the same philosophy of strategic and integrated maintainable SuDS to accommodate the growth area. Also, if you are placing an emphasis on habitat, you need to make it clear that you will be looking for SuDS which can perform hydraulically with low intrusive maintenance.	References added to the Marston Vale Surface Waters Plan. Comment on habitat relevant to document as a whole, not just Chapter Four. Enhancing biodiversity is covered as a local requirement, so it is considered that the balance of the document in relation to habitat is appropriate.
Bedford Group of Drainage Boards (John Oldfield)	Amendments to the CBC context: main rivers under the EA jurisdiction and the 2 drainage districts within CBC under the jurisdiction of IDBs.	Corrections made to include such information.

Bedford Group of Drainage Boards (John Oldfield)	Inclusion of information regarding the transition period.	Text will be included.
Bedford Group of Drainage Boards (John Oldfield)	Third party adoption needs to be clarified. Pg.30.	Clarified
Bedford Group of Drainage Boards (John Oldfield)	River Ivel and Ouse - are not generally natural...	Information regarding this has been taken from the Central Bedfordshire Biodiversity Character areas document.
Bedford Group of Drainage Boards (John Oldfield)	Amendments to river quality of the River Flit and Ouzel. Pg.60	This was checked and based on Central Bedfordshire Development Strategy: Ecosystem Services Appendices (January 2013)
CBC (Cllr David McVicar)	Requirement 10: Keep surface water above ground - can be mis-understood. Consider rewording	Reworded to: 'Reduce reliance on pipes and pumps'
CBC (Building Control)	Reference to Local Flood Management Strategy	Added
CBC (Environmental Policy)	Added Interim Section	Added
CBC (Environmental Policy)	How to use this document section needs strengthening	Amended
CBC (Environmental Policy)	How does the interaction between the developer and statutory consultees occur, should it always go through the SAB? How this works needs clarifying. Pg.23.	When planning application is not required, communication will go through SAB - text added to this effect
CBC (Environmental Policy) and Environment Agency	Removal of proposed canal on water courses map	Canal has been amended as a dashed line
David Lock on behalf of O&H Properties Ltd.	SuDS must be considered as part of an holistic masterplanning process; they are one of a range of issues and constraints that are taken into account in planning and design	CBC recognise that SuDS is one among many factors that influences the masterplanning process, and this is reflected in the emerging Development Strategy and recently adopted Design Guide. However, to support the design of

		effective, locally appropriate SuDS, this specific, detailed guidance has been produced, focussing on SuDS.
David Lock on behalf of O&H Properties Ltd.	It is vital that the guidance recognises the applicability of the different tiers of the SuDS design at each stage of the planning process. A proportional approach to SuDS is essential to ensure the correct level of detail is provided at the right time. A different level of SuDS design will be relevant at the strategic stages of the allocation and outline consent to the detailed stages of design codes and detailed / reserved matters consents.	Chapter two of the guidance sets out the different levels of detail required at the different stages of the planning process in recognition of this.
David Lock on behalf of O&H Properties Ltd.	Inclusion of basic design parameters that are considered to be acceptable by CBC	It was decided that providing design parameters beyond that included in the guidance would be too prescriptive and would result in homogeneous SuDS features throughout Central Bedfordshire. There is a need for designs to reflect the unique context of each site.
David Lock on behalf of O&H Properties Ltd.	The SDSPG should place a greater emphasis on locally relevant issues and existing understanding of local context.	Further inclusion and linkages to the Bedford Group of Drainage Boards and Marston Vale Surface Water Plan has been included.
David Lock on behalf of O&H Properties Ltd.	Clarity around requirements as well as thresholds/triggers that help to determine the circumstances where a comprehensive set of requirements would be applicable.	Clarification added: explicitly noted that major developments are 10 or more dwellings.
David Lock on behalf of O&H Properties Ltd.	What is considered to be acceptable for the drainage applications at key stages.	This information is contained in orange boxes within the chapter on the approval process (Chapter Two)

David Lock on behalf of O&H Properties Ltd.	Further guidance on the role of the SAB in terms of SuDS adoption and costs should be provided in this guidance.	Costs are to be determined at the National level, and will be covered in the finalised version of the National Standards
David Lock on behalf of O&H Properties Ltd.	What are the access arrangements and how does this work?	This will be addressed during discussions with the SAB and agreed on a case by case basis as part of the approval and adoption process.
David Lock on behalf of O&H Properties Ltd.	Geology map could be made more legible if it was merged with a locational map.	More urbanised areas have been labelled on the map.
English Heritage	Consideration given to heritage sites - including direct impacts as well as impacts on the surroundings to such sites. Sensitive areas should be avoided.	These issues will be considered as part of the planning application.
Environment Agency	Too many large images, document too long?	Images have been used to break up text and to illustrate the CBC context.
Environment Agency	Broken links	Links on page 11 have been checked - clicking on the link does not work; however this is the correct website. Document should be updated regularly and links should be checked and updated as needed with the rest of the document.
Environment Agency	Clarify when the statutory and non-statutory consultees will be consulted	Page 29 outlines when statutory consultees needed to be consulted. Clarified non-statutory consultees comments. It will be partly up to the SAB to take on board their comments.
Environment Agency	Clarification as to when underground storage is suitable - what process of elimination would result in underground storage being suitable?	Clarified that underground storage should be a last resort. Process for determining whether underground storage should be included is site dependent and based on a number of variables.
Environment Agency	Is the entry level stewardship scheme relevant? (pg 13)	Removed section
Environment Agency	Links to the geology mapper on the British Geological Survey (pg. 14)	Added

Environment Agency	Topography section (pg. 15)	Link topography to the geology.
Environment Agency	Requirement for the infiltration assessment is deemed to be very comprehensive and more than required. (pg 23)	Councils with experience adopting SuDS schemes informed the infiltration tests that should be required at this stage. Therefore, we have opted to keep these stringent requirements.
Environment Agency	SuDS Design (pg23) feasibility of SuDS should be considered - indicative runoff rates, divided by parcels if phased.	Added
Environment Agency	Check consultation table - is it the most up to date version.	Updated to include Canals and Rivers Trust
Environment Agency	Recommended comments to include: page 51, 52 and 53.	Text added.
Environment Agency and IDB	Importance of designing SuDS to mitigate flood Risk needs to be strengthened, including the map. Can groundwater and surface water be included on the same map. Flood modelling/historic flood risk.	CBC GIS does not have additional flood map data. Text surrounding this has been amended, and additional references added.
CBC (Minerals and Waste)	CBC guidance does not make mention of minerals and waste development - different issues but does need to be addressed. Does not mention recently adopted mineral and waste local plan.	Minerals and Waste discussion added. Reference to Minerals and Waste Plan added.
Natural England	Natural England supports the approach taken in this guidance, in particular your consideration of biodiversity, geology, landscape and soils. In principle, the guidance would not be subject to the Strategic Environmental Assessment Directive or the Habitats Directive. If there is any doubt on the need to carry out a SA or HRA a screening assessment should be carried out.	Sustainability Appraisal is not required for Supplementary Planning Documents (Planning Act 2008), and a Habitat Regulation Assessment is not required as it is not considered likely that this guidance is likely to have a significant effect on European habitats or species (Conservation of Habitats and Species Regulations 2010 (as amended)).
RSPB	Latest draft of the guidance looks great. Could images in the visions section be amended to illustrate SuDS in high density housing?	Images of SuDS in visions section amended; there is an image of SuDS in a high density urban setting.