

## **Maidenhead – Teddington Catchment Partnership response to SuDS consultation**

In the view of the Maidenhead – Teddington Catchment Partnership, the proposals do not as they stand offer an effective solution to the increasing risk of surface water flooding in our towns and cities.

The boroughs of Spelthorne, Elmbridge, Runneymede has been subject to damaging flood events in recent years. In addition to the problems arising from flooding, local rivers suffer from poor water quality, have low aesthetic appeal and as a result, community engagement with their local watercourses is often limited.

Sustainable Drainage Systems (SuDS) provide a highly important solution to all of these issues. With good engagement and design not only can they manage flood risk but can deliver many more benefits besides (often with little additional cost), including improving water quality, increasing biodiversity and providing better places to live, work and play. With the roll-out of the Catchment Based Approach (CaBA), catchment partnerships nationwide are in a prime position to drive co-delivery of cost-effective SuDS that have the support of local communities [local partnership example].

Unfortunately the positive progress towards the effective implementation of SuDS, which has been worked towards since the findings of the Pitt Review, has been entirely reversed by the revised proposals currently out for consultation. Not only do the current proposals now fall short of implementing an effective system, there is actually a real danger that they are weakening the current planning policy for SuDS. It appears that decisions on the viability, options for adoption and maintenance of SuDS appear to be left largely to the developer and that planning policy will only apply to major developments. We are concerned too, that the proposals do not appear to have sufficient regard to the potential costs to homes and businesses of flooding that is exacerbated by the non-installation of SuDS.

The current proposals are in sharp contrast with experiences in Scotland where SuDS implementation has become routine business following a well informed and evidence-based policy position, developed with the full input of the construction and water industries and drawing on a coherent and well resourced research and development programme. Evidence from this 'SuDS in Scotland' experience demonstrates that what the development industry really needs and welcomes is a level playing field and consistency in implementation of SuDS policy and practices. Following this, the private sector can rapidly adapt to good regulation, stimulating jobs and growth, and using innovation to turn a requirement into an excellent opportunity for water to add value to development, not detract from it.

The approach now used is unlikely to aid the implementation of the recommendations of the Pitt Review and is missing a huge opportunity to realise the additional multiple benefits of water quality improvements as well as biodiversity and amenity enhancements. This contravenes Defra's own recommendations for catchment based action to contribute to the delivery of multiple EU Directives including the Floods Directive & Water Framework Directive.

The Maidenhead – Teddington Catchment Partnership therefore urges that the new SuDS proposals are amended to address these key issues.

Signed on the behalf of the Maidenhead – Teddington Catchment Partnership

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