

Merthyr Tydfil County Borough Council Local Development Plan (2016-2031)

BRIEFING PAPER

Sustainable Drainage Systems (SuDS)

June 2019

EXAMINATION MATTERS, ISSUES AND QUESTIONS

Representor ID Number 116 (HBF)

The HBF would respond to the following two paragraphs of the Council's Statement:

4.5 The Council's engineers have advised that if designed in line with the standards and the SAB is engaged at an early design stage, SuDS can be integrated through a development with multiple SuDS features that provide multiple benefits (biodiversity, amenity etc). Pipe to pond type systems are no longer acceptable and if designed correctly future schemes could result in more developable land when compared to simple pipe to pond type systems. Where possible, the use of public open spaces should be used to act as storage during extreme events and the use of landscaped SuDS components that take up little space and are easily maintainable should be encouraged.

The HBF notes that prior to the SuDS legislation surface water runoff from sites was often controlled by oversize pipes or concrete tanks, hydro breaks and attenuation tanks, situated in either the highway or under areas of public open space. These solutions do not result in any loss of developable land on the site, however, as suggested in the council's statements SuDS schemes will be encouraged to provide greener solutions which will see a greater use of swales, infiltration trenches, detention basins (para. 3.5) all of which will use land which potentially could have been developed.

Further Para 4.5 of the Council statement states 'Where possible, the use of public open spaces should be used to act as storage during extreme events.' However, this type of storage is potentially only a small element of any SuDS scheme and from the Council's comments about encouraging the use of a range of green SuDS features it will not be as simply be a case of putting all SuDS features in the open space areas of a development. The HBF are concerned that such an approach may not be acceptable to the leisure department of the Council who may say areas which are designed to hold surface water do not count towards the area of land required to be provided by a development as POS, thus resulting in additional land being required to provide the required level of POS..

6.3 Where issues were identified in terms of the capacity of sites, changes have been proposed, either extending the boundary of the site to increase the flexibility of the site in terms of dealing with drainage issues and delivering the level of housing indicated, or reducing the number of dwellings in order to increase the scope for an acceptable drainage solution.

The changes made by the Council to site boundaries and likely number of units would seem to be contradictory to their earlier statements. If as suggested SuDS will not, in most cases, result in the loss of developable land, why have the Council needed to either increase the size of sites or reduce the number of dwellings expected to be delivered on a number of the allocated site.