

Committee on Climate Change
7 Holbein Place
London SW1W 8NR

The Rt Hon Elizabeth Truss MP
Secretary of State
Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR

24 October 2014

Dear Liz

Consultation on delivering Sustainable Drainage Systems

I am writing on behalf of the Adaptation Sub-Committee (ASC) of the Committee on Climate Change with regard to your Department's revised approach to promoting sustainable drainage systems (SuDS) in new development. As you know the ASC has statutory roles to provide independent advice on climate risks and report to Parliament on the steps being taken to prepare for climate change. The latest climate projections, using very high resolution models, suggest the chance of heavy summer rainfall in southern England has previously been underestimated and may increase by a factor of five by the 2080s in a high emissions scenario. SuDS are a low-regret adaptation measure, with construction and maintenance costs similar to conventional drainage whilst delivering a range of wider benefits including flood risk management.

The revised approach relies on the planning system to encourage SuDS by creating an "expectation" that they will be used in new development. My Committee considers this to be a significant weakening of what was recommended by the Pitt Review in 2008 and subsequently endorsed by Parliament in the 2010 Flood and Water Management Act.

We are particularly concerned that:

- **The revised approach excludes minor development.** There were around 100,000 minor planning applications approved in England in 2013/14. This type of small-scale development, often 'urban in-fill', can exacerbate surface water flood risk by placing extra pressure on existing sewer and drainage networks in built-up areas. Minor development should therefore not be exempt and instead be a primary focus for

encouraging SuDS.

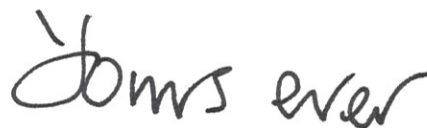
- **The automatic right to connect new development to sewers remains.** The Pitt Review recommended this be removed, so that SuDS are considered as the default option. Parliament agreed, in passing Schedule 3 of the Flood and Water Management Act. This part of the Act has not been commenced. Whilst this right remains developers are likely to continue to favour traditional piped solutions given the land required for some types of SuDS.

Pitt identified the automatic right to connect, and uncertainty regarding adoption and maintenance, as two key barriers to the uptake of SuDS. The revised proposals fail to resolve either of these issues. As now, adoption and maintenance of SuDS will have to be agreed on a case by case basis. Deciding who meets the costs of maintenance will remain problematic.

Local planning authorities have been required to give priority to SuDS in planning applications since 2007 and this was reiterated in the National Planning Policy Framework in 2012. It is therefore unclear how the revised proposals will improve upon the current approach. This has failed to deliver widespread uptake of SuDS to date, as was highlighted in the ASC's 2014 Progress Report *Managing Climate Risks to Well-Being and the Economy*. We note an impact assessment has not been published as part of the consultation.

Our concern is that the planning system alone, without resolving the issues Pitt identified, will not deliver the increase in the uptake of sustainable drainage systems desired. My Committee will continue to monitor the level of activity in this area, and is likely to return to the subject in our first statutory report to Parliament in June 2015.

I am copying this letter to the Secretary of State for Communities and Local Government.



PROFESSOR LORD KREBS Kt FRS
Chairman, Adaptation Sub-Committee