

Sustainable Drainage Systems (SuDS) Supplementary Planning Document (SPD)



Consultation Statement | January 2023

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1.0 Introduction

Purpose of this statement

- 1.1 It is important that the council engages with the community throughout the preparation of the Local Plan and other planning policy documents. In doing this we need to ensure we follow the Council's Statement of Community Involvement (SCI) and the Regulations¹ governing the development plan process.
- 1.2 In this case we were consulting on a draft supplementary planning document (SPD) in relation to Sustainable Drainage Systems (SuDS) which, upon adoption, will be used to provide additional information and guidance to Policy CC3 of the Mansfield Local Plan, and as a material planning consideration. This consultation took place for six weeks between 29 July 2022 and 12 September 2022.
- 1.3 This statement explains how we consulted and how we have taken the views of consultees into consideration during the preparation of the final SPD.

Sustainable Drainage Systems (SuDS) Supplementary Planning Document (SPD)

- 1.4 The SuDS SPD provides guidance on what types of Sustainable Drainage Systems could be used in new developments which allow for increased surface water to percolate into the ground (and not the combined sewer network) thereby reducing flooding risks. Sustainable drainage includes things such as landscaping schemes that will soak up rain, or permeable road surfaces that will allow rain to soak away naturally rather than enter and possibly overload the sewerage system.
- 1.5 As well as reducing the risk of flooding, sustainable drainage can also improve biodiversity, enhance green spaces and public spaces, reduce water pollution and help to provide resilience and adaptation to climate change.

Structure of this Statement

- 1.6 This statement is structured as follows:

¹ Town and Country Planning (Local Planning) (England) Regulations 2012.

- **Section 2** gives details on who was consulted including the list of specific and general consultation bodies,
- **Section 3** sets out how the consultation was undertaken,
- **Section 4** outlines who responded including the chosen response methods,
- **Section 5** provides a summary of the main issues raised and our response, and
- **Section 6** provides a conclusion to the consultation.

2.0 Who was consulted?

2.1 We sent a notification, either electronically or by post to 2,666 individuals and organisations registered on the local plan database. The notification explained the purpose of the consultation event and invited representations. This included the following specific and general consultation bodies. We also presented the draft document to members of the Mansfield Developers' Forum at a meeting that was held on 12th August 2022 during the consultation period.

Specific consultation bodies:

Arqiva	Mobile UK
Ashfield District Council	N Power
Bassetlaw District Council	National Grid Property
Bolsover District Council	Natural England
BT Plc	Network Rail
Chesterfield Borough Council	Newark & Sherwood District Council
Clipstone Parish Council	NHS Mansfield & Ashfield Clinical Commissioning Group
Coal Authority	NHS Property Services
Defence Infrastructure Organisation	North East Derbyshire District Council
Department for Transport	Norton and Cuckney Parish Council
Derbyshire County Council	Nottingham City Council
E.ON Central Networks	Nottinghamshire County Council
E.ON Energy Ltd	Nottinghamshire Fire & Rescue Service
East Midlands Councils	Nottinghamshire Police and Crime Commissioner
East Midlands Trains	Perlethorpe-cum-Budby Parish Meeting
Edwinstowe Parish Council	Rainworth Parish Council
Environment Agency - Lower Trent Area	Rufford Parish Council
Gedling Borough Council	Severn Trent Water Ltd
Health & Safety Executive	Severn Trent Water Ltd. (Mansfield)
Highways England	Sherwood Forest Hospitals NHS Trust
Historic England	Shirebrook Town Council
Homes England	Telefonica O2 UK Ltd
Home Builders Federation	Virgin Media
Hutchison 3G UK Ltd	Vodafone Ltd
Mansfield and Ashfield Strategic Partnership	Warsop Parish Council

General consultation bodies:

Age Concern Nottinghamshire	Groundwork Creswell, Ashfield & Mansfield
Age UK Nottinghamshire	National Farmers Union
Albert Street Residents Association	Health & Safety Executive
Ancient Monuments Society	Mansfield 2020 Ltd
APTCOO	Mansfield Community and Voluntary Service
Ashfield Links Forum	Nottinghamshire Biological and Geological Records Centre
British Horse Society	Nottinghamshire Wildlife Trust
Citizens Advice Bureau	Planning Inspectorate
Country Land and Business Association Ltd	Royal Society for the Blind (Nottinghamshire)
Derbyshire and Nottinghamshire Chamber of Commerce	Society for the Protection of Ancient Buildings
Derbyshire and Nottinghamshire Local Enterprise Partnership	Sport England
Derbyshire County Council	Stagecoach East Midlands
Derbyshire Gypsy Liaison Group	Sure Start Meden Valley
Disability Nottinghamshire	Sure Start Ravensdale
Forest Town Community Council Planning Sub-Committee	The Woodland Trust

3.0 How was the consultation undertaken?

3.1 A number of consultation methods were used in the preparation of the draft SuDS SPD to invite people's views and comments on it. The list below sets out the details of the methods of engagement used.

Pre-consultation engagement

3.2 In developing the draft SuDS SPD there were various consultations carried out with other teams at the Council as well as with Severn Trent Water Ltd and Nottinghamshire County Council (the Lead Local Flood Authority). The comments made were fed into the document.

Statutory requirements

3.4 There is a statutory requirement to consult on SPDs. The consultation period was extended to from four to six weeks (between 29 July and 12 September 2022) in order to account for the fact that it was during the school summer holidays and some people may have been away from work and unable to provide comments during this time.

- **Consult with specific and general consultation bodies** - Consultation was undertaken with the specific and general consultation bodies recorded in the local plan database. All organisations were sent a notification either electronically or by post including details about the consultation together with a link to the relevant webpage (www.mansfield.objective.co.uk/portal) where access to the report and online questionnaire was made available. This letter was also emailed / posted to all members of the public on the database, and can be viewed in Appendix 1.

Statement of Community Involvement

3.5 We made sure that we were in accordance with the Council's 2022 Statement of Community Involvement which was council policy at the time:

- **Making copies of documentation available for inspection** - Copies of the document, posters and the questionnaire were made available to view at the following venues:
 - Mansfield District Council - Civic Centre, Chesterfield Road South
 - Clipstone Village Library - First Avenue

- Forest Town Library - Clipstone Road West
 - Ladybrook Library - Ladybrook Place
 - Mansfield Library - West Gate
 - Mansfield Woodhouse Library - Church Street
 - Rainworth Library - Warsop Lane
 - Market Warsop Library - High Street
 - Warsop Town Hall – Church Street
- **Letters / Emails** - Notifications were sent either electronically or by post explaining the purpose of the consultation and how to comment to 2,666 individuals and organisations registered on the Local Plan database. A copy of the letter is included in Appendix 1.
 - **Website** - A PDF copy of the document was available to view and download from the Council’s website. The document was also available on the Local Plan Consultation Portal to allow people to comment online.
 - **Press releases** - A press release was issued by the Council. This gave details of the consultation period and where copies of the document were available for viewing. A copy is included in Appendix 1.
 - **Mansfield Developers’ Forum** – A Developers’ Forum was held during the consultation period (12 August 2022). Approximately 45 attendees listened to a presentation about the SuDS SPD and then had an opportunity to ask questions. They were also told how to make and submit comments.
 - **Social media (Facebook and Twitter)** - The Council’s Facebook page ‘Mansfield District Council - My Mansfield’ was updated during the consultation period to notify people about the consultation and provide them with links to the consultation portal. At the start of the consultation period the Council had 17,857 followers on Facebook.

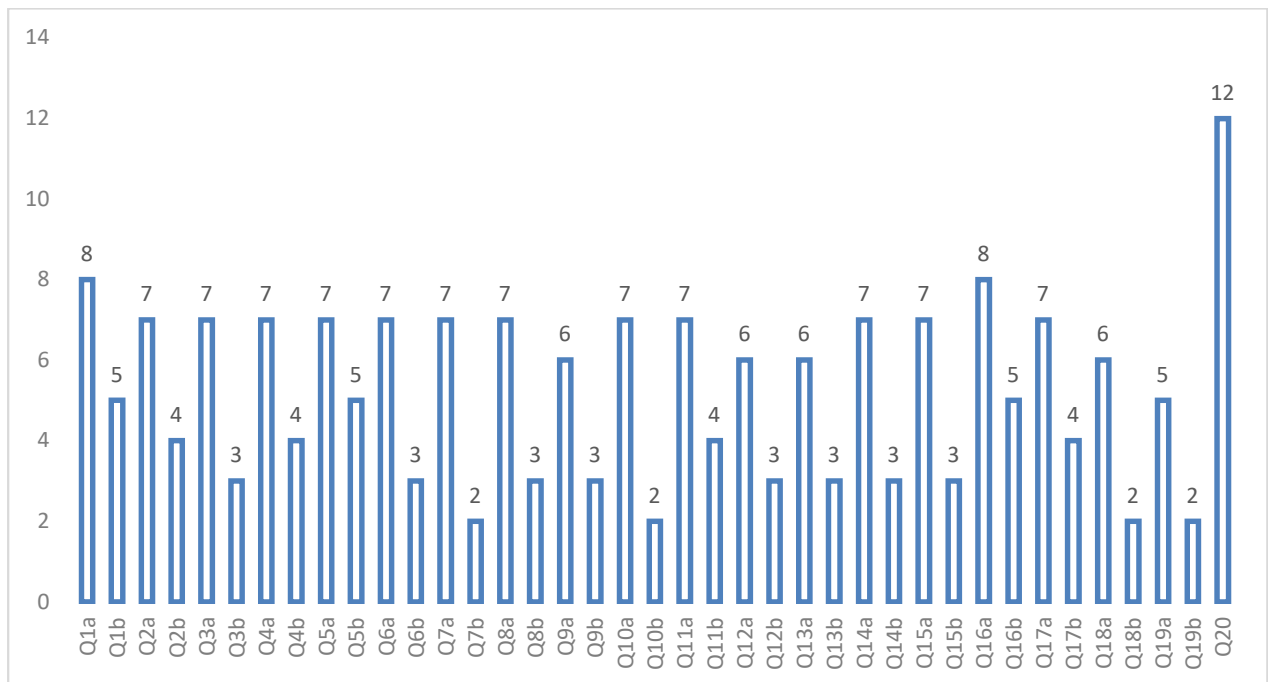
Tweets and posts were sent via the Council’s Twitter account (@MDC_News) and LinkedIn account (<https://www.linkedin.com/company/mansfield-district-council/>) to help raise awareness of the consultation, please see Appendix 1 for details. At the start of the consultation period the Council had 6,990 followers on Twitter, and 1,766 on LinkedIn.

- **Any other business** – Officers have raised awareness of the SuDS SPD, when appropriate, at other meetings they have attended.

4.0 Who responded?

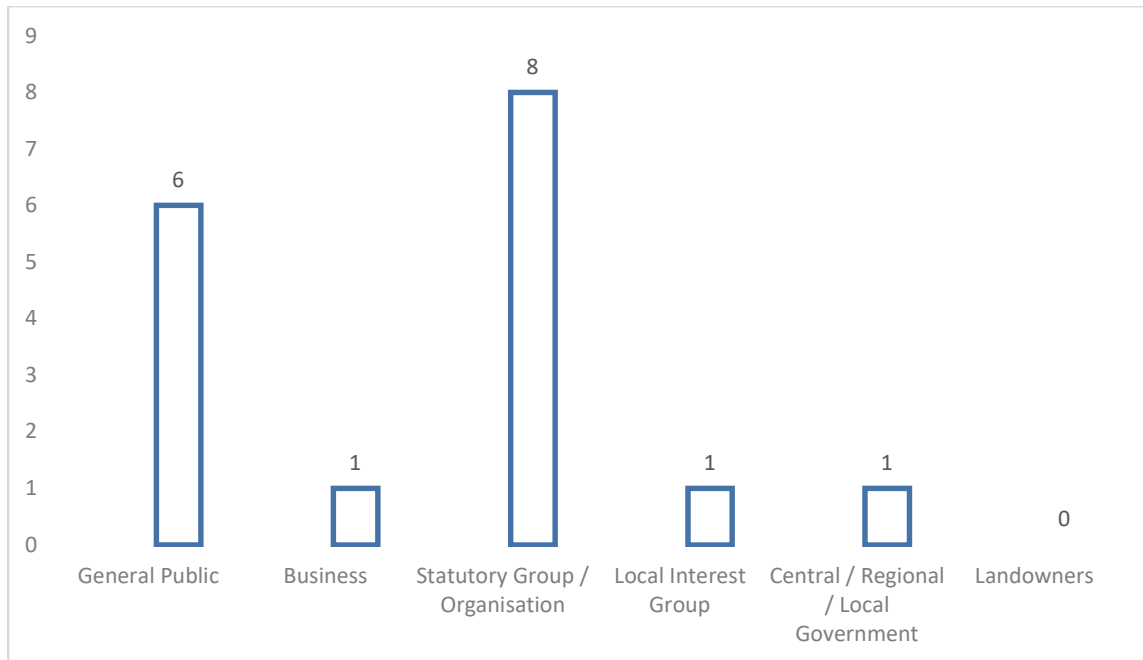
4.1 From those notified about the consultation on the draft SPD, a total of 17 people / organisations responded, although, as shown below, many didn't answer every question. Please see section 5 for more details.

Amount of comments per question:



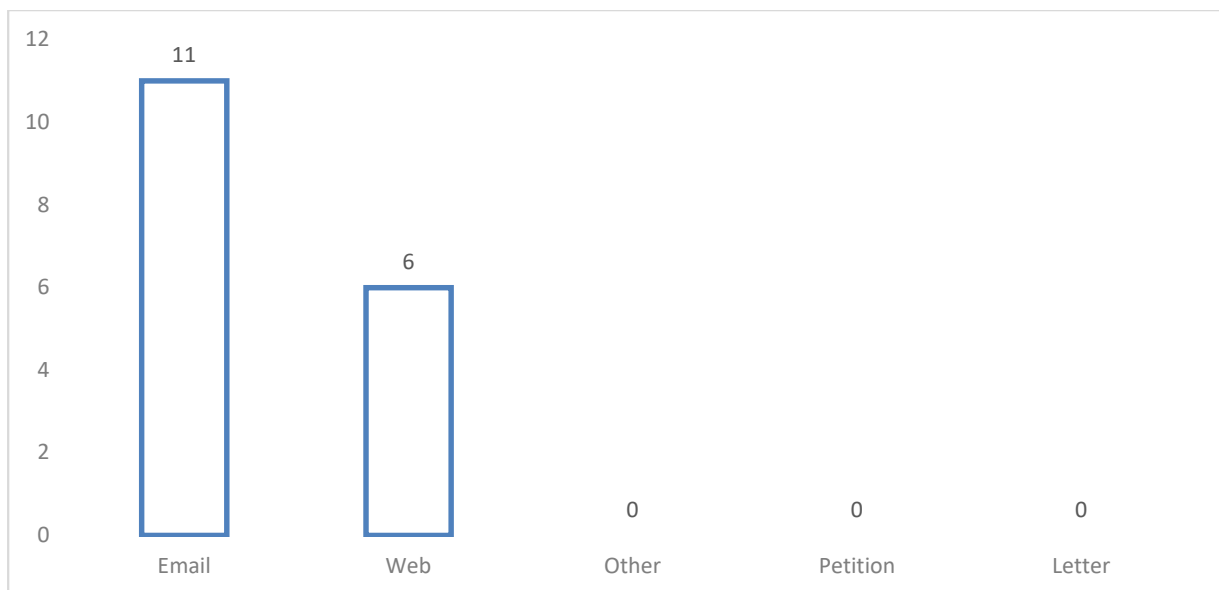
4.2 The following breakdown of respondent type shows that the majority of responses were submitted from statutory consultees and the general public. This is shown overleaf.

Respondent type:



4.3 The majority of comments were submitted via email. The chosen method of response of all the respondents is set out below.

Response method:



5.0 What was said and what was our response?

5.1 A summary of the comments received and our response is set out below.

Organisation (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
Q1a – Do you agree with the topics proposed to be covered in the SPD?			
Q1b – Reason:			
N/A	SUDS/7	Does not agree with the SPD topics due to overdevelopment of small areas and a lack of infrastructure.	The SuDS SPD seeks to improve the quality and effectiveness of drainage within new and existing developments. It does not address the quantity of development or wider infrastructure requirements. No action required.
N/A	SUDS/9	Agrees with the proposed topics but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed topics as they cover the systems that are available.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Agrees with the proposed topics but no reason given.	Noted.
Persimmon Homes	SUDS/12	Agrees with the proposed topics but no reason given.	Noted.
Environment Agency	SUDS/13	The SPD is welcomed. Advises that the newly revised Planning Practice Guidance (PPG) (Aug 2022) is reviewed to ensure all aspects are covered in the SPD.	The new paragraphs relating to sustainable drainage systems contained within the Planning Practice Guidance will also be a material consideration in the determination of planning applications and need not be

			repeated in the SPD. The SPD is broadly consistent with the new PPG guidance and no conflicting guidance has been identified. Action: Insert new paragraph at end of 2.2.2 pointing to updated PPG. <i>“During the consultation period on the SuDS SPD, the Department for Levelling Up, Housing and Communities issued additional guidance relating to Sustainable Drainage systems as part of the Planning Practice Guidance². The new guidance is a material consideration in the development of planning policy and the determination of planning applications and should be considered alongside this SPD in developing proposals.”</i>
Severn Trent Water	SUDS/14	Agrees with the proposed topics but no reason given.	Noted.
Historic England	SUDS/15	Agrees with the topics, and welcomes the advice in para 3.2 and the requirement for SuDS to be sympathetic to the historic environment.	Noted.
Q2a – Are there any other matters that you think should be covered in the SPD?			
Q2b – What and why:			
N/A	SUDS/7	Considers that the SPD should also provide more green spaces.	The provision of open spaces is dealt with through Local Plan policy IN4. The provision of SuDS could be

² <https://www.gov.uk/guidance/flood-risk-and-coastal-change#para55>

			within or enhance existing green spaces. No Action required.
N/A	SUDS/9	No other matters should be covered.	Noted.
N/A	SUDS/10	No other matters should be covered.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Yes, states that the SPD should cover SuDS and culverts. States that culverts should be removed where possible as this will enhance biodiversity, make places more attractive to live and improve people's health and well-being. This would also be in line with the SuDS principle to use surface water features where infiltration is not possible.	Agreed. The principle of removing culverts, where possible, is supported. Action: Amend SuDS SPD 15 by inserting paragraph stating <i>"Where possible culverts should be removed in order to: enhance biodiversity and green infrastructure, make places more attractive to live and improve people's health and well-being."</i>
Persimmon Homes	SUDS/12	No other matters should be covered.	Noted.
Environment Agency	SUDS/13	Considers other matters should be included. Letter sent in as comments do not fit the questions. (See Q20).	Noted. Letter is addressed under Q20.
Severn Trent Water	SUDS/14	Compatibility with the Mansfield Town Masterplan and wider Severn Trent Green Recovery Project should be covered to maximise the benefits and / or Biodiversity Net Gain when applicable.	Agreed. The Council supports proposals that seek to be compatible with the masterplan and / or Green Recovery Project. Action: Insert new paragraph 4.3.5 to state: <i>"The Council seeks to encourage all development to be compatible with the objectives of the Mansfield Town Masterplan and the Severn Trent Green Recovery Project. It is</i>

			<i>important that proposed SuDS schemes compliment these proposals and where possible maximise either the flood risk benefits or Biodiversity Net Gain."</i>
Q3a – Do you agree with the proposed guidance relating to the Mansfield Sustainable flood resilience - Severn Trent green recovery programme?			
Q3b – Reason:			
N/A	SUDS/7	Does not agree - no reason stated.	Noted.
N/A	SUDS/9	Agrees with the proposed guidance regarding the Severn Trent green recovery programme but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding the Severn Trent green recovery programme but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Agrees with the proposed guidance regarding the Severn Trent green recovery programme but no reason given.	Noted.
Persimmon Homes	SUDS/12	Agrees to an extent. However states that a lot of Mansfield's proposed developments (including housing allocations) are on greenfield sites and will miss out on the opportunity - which is generally isolated to brownfield developments.	Noted. The Severn Trent Green Recovery Project seeks to optimise delivery of SuDS on previously developed / regeneration sites where more substantial gains in infiltration can be achieved. Delivery on greenfield sites (particularly large sites) should be capable of delivering high quality SuDS without the need for subsidy from Severn Trent. Notwithstanding this, the eligibility criteria is set by Severn Trent Water (the fund manager) and not Mansfield District Council. No further action required.

Environment Agency	SUDS/13	Agrees with and welcomes the proposed guidance, and the note that other guidance within the SPD should also be adhered to.	Noted.
Severn Trent Water	SUDS/14	Agrees with the approach as it seems consistent with the proposals for the Severn Trent Green Recovery Project.	Noted.
Q4a – Do you agree with the proposed guidance relating to the SuDS Management Train?			
Q4b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding the SuDS management train but no reason given.	Noted.
N/A	SUDS/9	Agrees with the proposed guidance regarding the SuDS management train but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding the SuDS management train but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Does not agree on the basis that the wording of point four should be amended. States that the management train concept promotes division of the area to be drained into sub-catchments with different drainage characteristics and land uses, each with its own drainage strategy. When dividing catchments into small sections it is important to retain a perspective on how this affects the whole catchment management and the hydrological cycle. https://www.susdrain.org/delivering-suds/using-suds/suds-principles/management-train.html	Noted. It was not the intention of the policy to encourage subdivision through the SuDS Management Train. It is agreed that “When dividing catchments into small sections it is important to retain a perspective on how this affects the whole catchment management and the hydrological cycle.” Additional wording to bullet point 4 has been added which clarifies this. Action: Add the following wording after bullet point 4 of SuDS SPD 2. “ <i>When drainage catchments are unable to be fully linked, are in small sections or sub-divided it is important that developers consider how this affects the whole catchment management</i> ”

	<p><i>and the hydrological cycle. In such cases it is important that SuDS manage surface water by redirecting it away from the sewerage system in a sustainable, controlled manner.”</i></p>
<p>do not agree and states that sometimes SuDS cannot be an interconnected system within one site as it may not always be possible. The important point is that they manage surface water by redirecting it away from the sewerage system in a sustainable, controlled manner which has wider benefits.</p>	<p>Agree. There are circumstances where it is not possible for SuDS to be fully connected. Action: Add the following paragraph after bullet point 4 of SuDS SPD 2. <i>“When drainage catchments are unable to be fully linked, are in small sections or sub-divided it is important that developers consider how this affects the whole catchment management and the hydrological cycle. In such cases it is important that SuDS manage surface water by redirecting it away from the sewerage system in a sustainable, controlled manner.”</i></p>
<p>is consistent with the proposed guidance, but states that developers will also need to be directed to any new / emerging guidance.</p>	<p>Noted. New paragraph advising of updated Planning Practice Guidance inserted. Action: Insert new paragraph at end of 2.2.2 pointing to updated PPG. <i>“During the consultation period on the SuDS SPD, the Department for Levelling Up, Housing and Communities issued additional guidance relating to Sustainable Drainage systems as</i></p>

			<i>Guidance³. The new guidance is a material consideration in the development of planning policy and the determination of planning applications and should be considered alongside this SPD in developing proposals.”</i>
Severn Trent Water	SUDS/14	Agrees with the approach as it aligns with current industry guidance.	Noted.
Q5a – Do you agree with the proposed guidance relating to different kinds of SuDS on large sites?			
Q5b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding the different types of SuDS on large sites but no reason given.	Noted.
N/A	SUDS/9	Agrees with the proposed guidance regarding the different types of SuDS on large sites but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding the different types of SuDS on large sites as this provides flexibility to developers.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Agrees with the proposed guidance regarding the different types of SuDS on large sites but no reason given.	Noted.
Persimmon Homes	SUDS/12	Agrees with the guidance but states that the size of the site shouldn't dictate what SuDs options are available, this should be based on site constraints.	Partly agree. The size of the site could have an influence on the type of SuDS interventions that could potentially be used. Particularly smaller sites where ponds or detention basins may not be suitable. It is agreed that some site

³ <https://www.gov.uk/guidance/flood-risk-and-coastal-change#para55>

			constraints could influence the type of SuDS to be used. Action: Amend final paragraph of SUDS SPD 3 to include “.....existing site conditions and constraints....”
Environment Agency	SUDS/13	Agrees with the guidance but the Lead Local Flood Authority are better placed to comment.	Noted.
Severn Trent Water	SUDS/14	Agrees with the proposed guidance but highlights that there are limited benefits from geo-cellular - they only provide attenuation benefits.	Noted. It is accepted that different types of SuDS interventions offer a different range of benefits. Geo-cellular structures can help to store, and therefore regulate, the rate which surface water enters the combined sewer. Action: No change proposed.
Historic England	SUDS/15	Suggests referring to design guidance for ponds in ‘Water Features in Historic Settings: A Guide to Archaeological and Palaeoenvironmental Investigations’ - https://historicengland.org.uk/images-books/publications/water-features-historic-settings	Noted. Action: Insert new paragraph 4.5.7 and Footnote to clarify the issue. “ <i>The type of SuDS chosen also has an influence on the built and historic environment. Historic England have produced guidance ‘Water Features in Historic Settings: A Guide to Archaeological and Palaeoenvironmental Investigations’ which considers water features such as ponds.</i> ”
Q6a – Do you agree with the proposed guidance relating to SuDS on small sites?			
Q6b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding SuDS on small sites but no reason given.	Noted.

N/A	SUDS/9	Agrees with the proposed guidance regarding SuDS on small sites but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding SuDS on small sites but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Agrees with the proposed guidance regarding SuDS on small sites but no reason given.	Noted.
Persimmon Homes	SUDS/12	Agrees to some extent, however states that the cost of permeable paving may not be feasible on small sites.	Permeable paving need not make smaller schemes non-viable. It is an important method for securing permeable paving and should not be discounted. There are multiple types of permeable solutions. Action: No change proposed.
Environment Agency	SUDS/13	Agrees with the guidance but it may be possible to also provide other rainwater harvesting techniques - where practicable.	Agreed: Action: Add " <i>Rain gardens</i> " to <u>SUDS SPD 4</u>
Severn Trent Water	SUDS/14	Agrees with the proposed guidance but water butts would need to incorporate an overflow.	Noted. This is a detailed design matter. No further action required.
Q7a – Do you agree with the proposed guidance relating to the SuDS Drainage Hierarchy?			
Q7b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding the SuDS drainage hierarchy but no reason given.	Noted.
N/A	SUDS/9	Agrees with the proposed guidance regarding the SuDS drainage hierarchy but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding the SuDS drainage hierarchy but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Agrees with the proposed guidance regarding the SuDS drainage hierarchy but no reason given.	Noted.
Persimmon Homes	SUDS/12	Agrees with the proposed guidance regarding the SuDS drainage hierarchy but no reason given.	Noted.

Environment Agency	SUDS/13	Agrees with the proposed guidance, which has not been changed in the revised PPG.	Noted.
Severn Trent Water	SUDS/14	Agrees with the proposed guidance, as highlighted in their standard advice.	Noted.
Q8a – Do you agree with the proposed guidance relating to the SuDS design process?			
Q8b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding the SuDS design process but no reason given.	Noted.
N/A	SUDS/9	Agrees with the proposed guidance regarding the SuDS design process but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding the SuDS design process but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Agrees with the proposed guidance regarding the SuDS design process but no reason given.	Noted.
Persimmon Homes	SUDS/12	<p>Disagrees with the guidance relating to the SuDS design process. States that an Outline SuDS strategy should not be needed at outline stage as:</p> <ul style="list-style-type: none"> • SuDs require detailed design and even an overarching strategy may not be known at this stage. It would depend upon many factors including ground conditions and at outline stage, a ground investigation may not have been carried out. • A FRA is a validation requirement for a planning permission, a SuDs strategy is not. • Often an Outline Application is submitted by an applicant that is not a developer, and therefore information submitted may not be developer-friendly and may not be deliverable. For example, only a developer could outline their intended maintenance plan as the ones developing the site. This may result in an Outline Planning Permission granted based upon principles that cannot be met, resulting in S73 applications or new permissions being submitted and subsequently delays to development. 	Partly agreed. In some cases, where no details are submitted in terms of layout and housing numbers, it may not be possible to submit details in relation to: justification for the proposed SuDS solution; calculations of run-off rates and storage requirements; details of site investigation findings; assessment of flood risk (on and off site); conceptual design; outline construction management plan; and outline maintenance plan. However, in circumstances where it is not possible to provide these details as part of outline planning applications,

			<p>planning conditions will be introduced seeking these through detailed or reserved matters applications. Action: Amend wording of SuDS SPD 6 (Outline Planning application section)_to read:</p> <p><i>“Outline Planning application stage</i></p> <p><i>In order to demonstrate, in principle, that a site is capable of being satisfactorily drained, the following details should accompany outline applications. In all cases, major outline planning applications should include:</i></p> <ul style="list-style-type: none"> <i>• location plan;</i> <i>• an indicative drainage strategy and ‘flood risk assessment’[1];</i> <p><i>In cases where proposals are within flood zones 2 or 3 or where surface water drainage issues have been identified, the following information should be provided:</i></p> <ul style="list-style-type: none"> <i>• calculations of run-off rates and storage requirements;</i> <i>• details of site investigation findings;</i>
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			<ul style="list-style-type: none"> • <i>assessment of flood risk (on and off site);</i> • <i>conceptual design;</i> • <i>outline construction management plan; and</i> • <i>outline maintenance plan.</i> <p><i>In circumstances where it is not possible to provide these details as part of outline planning applications, planning conditions will be introduced seeking these as part of detailed or reserved matters planning applications.”</i></p>
Environment Agency	SUDS/13	Supports the guidance, particularly para. 4.8.3.	Noted.
Severn Trent Water	SUDS/14	Agrees with the proposed guidance although caution should be used when considering 30% betterment to ensure brownfield run-off estimates are accurate.	Noted. This will be detailed matter that can be evidenced and tested at the time of application submission. No further action required.
Q9a – Do you agree with the proposed guidance relating to provision of SuDS on previously developed land?			
Q9b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding the provision of SuDS on PDL but no reason given.	Noted.
N/A	SUDS/9	Agrees with the proposed guidance regarding the provision of SuDS on PDL but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding the provision of SuDS on PDL as this is a key area.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Agrees with the proposed guidance regarding the provision of SuDS on PDL but no reason given.	Noted.

Persimmon Homes	SUDS/12	Does not agree with the guidance relating to SuDS on PDL as a minimum 30% reduction on the pre-development discharge rate to sewers adds another significant challenge to the delivery of previously developed land.	Noted. The guidance is considered reasonable and proportionate. It is accepted that in some circumstances 30% may be challenging but it is a good benchmark to try and achieve betterment in terms of regulating run-off. No further action required.
Environment Agency	SUDS/13	Supports the guidance. Notes that it is important that any SuDS scheme on PDL does not pose a potential risk to controlled waters, particularly on land which has previous potentially contaminating uses.	Agreed. Amendment to SuDS SPD7 paragraph 3 to add: “....allow for greater interception and effective treatment of sediment and other pollutants..... <i>Schemes on PDL must not pose a potential risk to controlled waters, particularly on land which has previous potentially contaminating uses.</i> ”
Q10a – Do you agree with the proposed guidance relating to the provision of SuDS on greenfield sites?			
Q10b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding the provision of SuDS on greenfield sites but no reason given.	Noted.
N/A	SUDS/9	Agrees with the proposed guidance regarding the provision of SuDS on greenfield sites but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding the provision of SuDS on greenfield sites but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Agrees with the proposed guidance regarding the provision of SuDS on greenfield sites but no reason given.	Noted.
Persimmon Homes	SUDS/12	Agrees with the proposed guidance regarding the provision of SuDS on greenfield sites but no reason given.	Noted.

Environment Agency	SUDS/13	Agrees with the guidance but the Lead Local Flood Authority are better placed to comment.	Noted.
Severn Trent Water	SUDS/14	Does not agree with the proposed guidance as, whilst the general principles are acceptable, there are concerns over the reference to 5/l per Ha. It is recommended that this figure (a rough estimate) is removed and that all sites should undertake the appropriate calculations to determine QBAR.	Agreed. Action: Amend wording of SuDS SPD 8 (para 2) to read: <i>“All greenfield site applications should undertake the appropriate calculations to determine QBAR”</i> and refer to 5l/s per ha as a rule of thumb in the footnote.
Q11a – Do you agree with the proposed guidance relating to SuDS and design quality?			
Q11b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding SuDS and design quality but no reason given.	Noted.
N/A	SUDS/9	Agrees with the proposed guidance regarding SuDS and design quality but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding SuDS and design quality but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Does not agree with the proposed guidance and states that the following should be included as design principles: <ul style="list-style-type: none"> • SuDS interventions should be designed to appear as ‘natural features’ in the townscape and landscape and maximise opportunities to enhance biodiversity. • Wildlife habitats and informally landscaped areas should be planted with native species of local provenance wherever possible to maximise flowering and fruiting periods to benefit invertebrates and birds. • All planting that links SuDS features with existing, natural wetlands should use native species from an accredited source to prevent the spread of alien species and protect native habitat. 	Agreed. Although this is a detailed technical approach it has merit in improving the potential for biodiversity in SuDS. Action: Amend SuDS SPD 9 to read: <i>“All SuDS interventions should seek make a positive contribution to townscape and landscape. SuDS solutions should not simply seek to meet minimum technical standards in the management of surface water but should seek to enhance the wider area. This should be through their</i>

		<ul style="list-style-type: none"> • Use wildflower-rich turf. This may be more expensive so to reduce costs, consider using a smaller amount but intersperse this with the amenity turf so that over time, wildflowers can colonise other areas. • Plant with native plant plugs after permanent ground cover has been established in order to bring added plant and wildlife diversity (if using normal amenity turf). 	<p><i>design, landscaping, opportunities for bio-diversity and creating or adding to blue and green infrastructure.</i></p> <p><i>SuDS interventions should, where possible, be designed to appear as 'natural features' in the townscape and landscape. The use of wet balancing areas, bio-swales and planted verges are supported where they provide visual enhancements.</i></p> <p><i>Wildlife habitats and informally landscaped areas associated with SuDS should be planted with native species of local provenance wherever possible to maximise flowering and fruiting periods to benefit invertebrates and birds. All planting that links SuDS features with existing, natural wetlands should use native species from an accredited source to prevent the spread of alien species and protect native habitat.</i></p> <p><i>The 'hard' construction elements of SuDS such as concrete structures, retaining areas, metal inspection ladders and other features should be avoided, and where necessary</i></p>
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			<p><i>discreetly located to maintain the natural appearance of interventions. Well-designed SuDS interventions should be used to ‘break up’ expanses of hard surface in new developments and as part of retro-fitted solutions.</i></p> <p><i>The following design principles should be employed. All new SuDS interventions should:</i></p> <ul style="list-style-type: none"> <i>•be designed to appear as ‘natural features’ in the townscape and landscape and maximise opportunities to enhance biodiversity</i> <i>•be well-integrated and ‘seamless’ features within new developments and as features introduced into the built and natural environment;</i> <i>•integrate well in the landscape framework and existing and proposed areas of open space and planting;</i> <i>•respect local distinctiveness and protect existing heritage or cultural features and visual importance;</i> <i>•allow for and promote the movement of people particularly walking and cycling through open spaces;</i>
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			<ul style="list-style-type: none"> •enhance the amenity of open space through the introduction of additional planting, user interaction areas, high quality finishes and planting; •contribute towards enhanced biodiversity. Measures such as the use of wildflower-rich turf and planting with native plant plugs after permanent ground cover has been established are encouraged; •be easily accessible for management and maintenance; and •be safe ensuring that features are not hazardous.”
Persimmon Homes	SUDS/12	Agrees with the proposed guidance regarding SuDS and design quality but no reason given.	Noted.
Environment Agency	SUDS/13	Supports the guidance.	Noted.
Severn Trent Water	SUDS/14	Supports the proposed guidance as it would align with the principles of the Severn Trent Green Recovery project, and wider guidance regarding the design of SuDS.	Noted.
Historic England	SUDS/15	Welcomes the recognition that SuDS can make a positive contribution to heritage, and that the scoping stage should identify key environmental issues on site. Also welcomes the guidance that the design of SuDS should respect local distinctiveness and protect existing heritage or cultural features and visual importance.	Noted.
Q12a – Do you agree with the proposed guidance relating to SuDS in Mansfield Town Centre?			
Q12b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding SuDS in Mansfield town centre but no reason given.	Noted.

N/A	SUDS/9	Agrees with the proposed guidance regarding SuDS in Mansfield town centre but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding SuDS in Mansfield town centre but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Does not agree with the proposed guidance in relation to the town centre as SuDS should normally be secured on-site, with off-site provisions or financial contributions only in some circumstances. States that there should be clearer guidance relating to what circumstances apply. Currently developers can shift responsibility from their site to another, which can also reduce maintenance costs. States that the hierarchy of treatment stages within the management train should also apply and gives detailed descriptions regarding prevention, source control, site control, regional control and conveyance features.	Noted. It is accepted that the preference is to deliver SuDS on site. However, there are diverse technical reasons or site characteristics / circumstances where this may not always be feasible or desirable. In such circumstances, greater betterment could be achieved off site. No further action required.
Environment Agency	SUDS/13	Supports the guidance. Would strongly support schemes which contribute to reducing fluvial flood risk as well as surface water flood risk.	Noted. SuDS SPD10 does not specifically relate to addressing surface water flooding. The proposals would also have beneficial impacts on reducing fluvial flooding. No further action required.
Severn Trent Water	SUDS/14	Supports the proposed guidance as it would align with the principles of the Severn Trent Green Recovery project, and wider guidance regarding the design of SuDS.	Noted.
Q13a – Do you agree with the proposed guidance relating to SuDS for new residential and commercial development proposals?			
Q13b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding SuDS on new residential and commercial development schemes due to overdevelopment of small areas.	Noted. The SuDS SPD specifically deals with matters of securing more effective surface water drainage. Issues of the level of ‘over-development’ are considered as part of the wider determination of

			planning applications. No further action required.
N/A	SUDS/9	Agrees with the proposed guidance regarding SuDS on new residential and commercial development schemes but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding SuDS on new residential and commercial development schemes but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Agrees with the proposed guidance regarding SuDS on new residential and commercial development schemes but no reason given.	Noted.
Environment Agency	SUDS/13	Supports the guidance.	Noted.
Severn Trent Water	SUDS/14	Supports the proposed guidance as it would align with the principles of the Severn Trent Green Recovery project, and wider guidance regarding the design of SuDS.	Noted.
Q14a – Do you agree with the proposed guidance relating to information requirements for SUDS as part of new developments?			
Q14b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding information requirements but no reason given.	Noted.
N/A	SUDS/9	Agrees with the proposed guidance regarding information requirements but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding information requirements but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Agrees with the proposed guidance regarding information requirements but no reason given.	Noted.
Persimmon Homes	SUDS/12	Does not agree with the proposed information requirements as outline applications should not require a SuDS strategy or evidence of a third party agreement for discharge into sewers.	Partly agreed. Submission of a 'Drainage Strategy' on major applications normally forms part of the submission to ensure validation. The guidance seeks to set out best practice to ensure that SuDS issues

			are addressed from the earliest stages of the development process. However, it is accepted that it may not be feasible for all outline planning applications to submit this level of detail. Action: Insert a footnote indicating that: <i>“In circumstances where it is not possible to provide these details as part of outline planning applications, planning conditions will be introduced seeking these as part of detailed or reserved matters applications.”</i>
Environment Agency	SUDS/13	Agrees with the guidance but the Lead Local Flood Authority are better placed to comment.	Noted.
Severn Trent Water	SUDS/14	Supports the proposed guidance but suitable assessments of brownfield sites are needed to ensure existing flows are appropriately calculated. Where this is not possible development should be designed to match equivalent greenfield run-off rates.	Agreed. Action: Add the following text to ‘Technical information’ section of SuDS SPD12: <i>“Design calculations for greenfield or brownfield run-off (suitable assessments of brownfield sites are needed to ensure existing flows are appropriately calculated)”</i>
Q15a – Do you agree with the proposed guidance relating to retrofitting of SuDS in existing urban areas?			
Q15b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding the retrofitting of SuDS but no reason given.	Noted.
N/A	SUDS/9	Agrees with the proposed guidance regarding the retrofitting of SuDS but no reason given.	Noted.

N/A	SUDS/10	Agrees with the proposed guidance regarding the retrofitting of SuDS as this is essential.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Agrees with the proposed guidance regarding the retrofitting of SuDS but no reason given.	Noted.
Persimmon Homes	SUDS/12	Agrees with the proposed guidance regarding the retrofitting of SuDS but no reason given.	Noted.
Environment Agency	SUDS/13	Supports retrofitting of SuDS, which would need to be considered on a site-by-site basis. Advises that necessary measures will need to be put in place for any proposals which would divert or retrofit existing surface water networks for SuDS to ensure the new scheme contains surface water only and there are no existing misconnections to foul networks/drains. Also consider measures that prevent future misconnection of foul drains to SuDS serving new developments.	Noted. These are valid concerns but are more appropriately dealt with as part of the planning and building control consent process rather than through the SPD. No further action required.
Severn Trent Water	SUDS/14	Agrees with the proposed guidance as it is consistent with the rest of the SuDS SPD, and ongoing projects in Mansfield.	Noted.
Q16a – Do you agree with the proposed guidance relating to SuDS and biodiversity?			
Q16b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding SuDS and biodiversity but no reason given.	Noted.
N/A	SUDS/9	Agrees with the proposed guidance regarding SuDS and biodiversity but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding SuDS and biodiversity but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Does not agree with the proposed guidance regarding SuDS and biodiversity. States that it needs to include the following details: Biodiversity design criteria <ul style="list-style-type: none"> • Support and protect natural local habitat and species • Contribute to the delivery of local biodiversity objectives • Contribute to habitat connectivity • Create diverse, self-sustaining and resilient ecosystems 	Agreed. Action: Amend SuDS SPD14 to read: <i>“SuDS solutions are encouraged that optimise biodiversity and:....Support and protect natural local habitat and species</i> <ul style="list-style-type: none"> •Contribute to the delivery of local biodiversity objectives

		Engage communities in SuDS and their wildlife through site interpretation and events programme.	<ul style="list-style-type: none"> • <i>Contribute to habitat connectivity</i> • <i>Create diverse, self-sustaining and resilient ecosystems</i> • <i>Include provision of green SuDS and softer landscape features and vegetation in place of underground pipes or instead of canalising watercourses, and</i> • <i>Include provision of surface water features and associated waterside vegetation to encourage newts, frogs and toads and other wildlife."</i>
Persimmon Homes	SUDS/12	Does not agree with the guidance relating to SuDS and biodiversity as it is not clear which takes priority if there is a conflict between the two.	Noted. It is not possible for the SPD to address all eventualities in the planning balance. Each case must be considered on its merits. Notwithstanding this, SuDS, like all development, must have regard to designated ecological habitats and species. No further action proposed.
Environment Agency	SUDS/13	<p>Agrees with the proposed guidance, but in relation to larger developments:</p> <ul style="list-style-type: none"> • Suggests that, where practical, SuDS should be strategically placed to support and enhance local nature recovery networks, building ecological resilience into the landscape by connecting attenuation basins, retention/detention ponds and wetlands at key locations that improve buffers between developed areas and existing valuable habitats. • Suggests that we stipulate that using existing ponds or wetlands to treat run-off should be avoided (new ponds should be created instead in order to avoid damaging or disturbing existing wildlife). 	Agree. Amend SuDS SPD 14 to read: <i>"...Larger developments which contain strategic green infrastructure or linked networks should seek to create SuDS that allow for linked areas of bio-diversity and the movement of wildlife. SuDS should be strategically placed to support and enhance local nature recovery networks, building ecological resilience into the</i>

		<ul style="list-style-type: none"> Suggests that wetland creation should act as the last treatment stage of a SuDS management train in order to reduce avoidable siltation and ongoing maintenance issues. 	<i>landscape by connecting attenuation basins, retention / detention ponds and wetlands at key locations that improve buffers between developed areas and existing valuable habitats....” And “...Wetland creation should act as the last treatment stage of a SuDS management train in order to reduce avoidable siltation and ongoing maintenance issues....”</i>
Severn Trent Water	SUDS/14	Agrees with the proposed guidance as it is consistent with best practice and SuDS objectives.	Noted.
Nottinghamshire County Council	SUDS/17	Welcomes the recognition of the benefits SuDS can have on biodiversity, especially when designed in. Suggests that the policy and supporting text refer to the use of native species in landscaping schemes (especially where SuDS form part of green infrastructure), or other wildlife friendly plants. Suggests reference should be made to striking a balance between management activities (and the work programme of these) and biodiversity.	<p>Agreed. Action: Add bullet point to final paragraph of SuDS SPD 14 to read: <i>“SuDS solutions are encouraged that optimise biodiversity and:</i></p> <ul style="list-style-type: none"> <i>Support and protect natural local habitat and species</i> <i><u>Use native species and wildlife friendly plants in landscaping schemes....”</u></i>
Q17a – Do you agree with the proposed guidance relating to SuDS and green infrastructure?			
Q17b – Reason:			
N/A	SUDS/7	Does not agree as green spaces should be left for people to enjoy.	Noted. The SPD does not propose the loss of green spaces. The provision of SuDS need not necessarily detract from green

			spaces. In many cases it can add value to green spaces through high quality landscaping. No further action proposed.
N/A	SUDS/9	Agrees with the proposed guidance regarding SuDS and green infrastructure but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding SuDS and green infrastructure but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Does not agree with the proposed guidance regarding SuDS and green infrastructure. States that it needs to include the objective to seek to address areas that are currently culverted.	Noted. The policy already states: "...Where possible culverts should be removed in order to enhance biodiversity, and green infrastructure...." No further action required.
Persimmon Homes	SUDS/12	Agrees with the proposed guidance regarding SuDS and green infrastructure but no reason given.	Noted.
Environment Agency	SUDS/13	Agrees with proposed guidance and just suggests that under para 4.2 the 'SuDS and green infrastructure' bullet point is replaced with 'SuDS and blue-green infrastructure'.	Agreed. Action: Change paragraph 4.2 (bullet point 16) to read: " <i>SuDS and blue - green infrastructure</i> "
Severn Trent Water	SUDS/14	Does not agree with the guidance as permeable paving provides no green infrastructure benefits.	Disagree. 'Grasscrete' or other greened surfacing can have some modest benefits on Green Infrastructure. No further action required.
Q18a – Do you agree with the proposed guidance relating to SuDS and climate change?			
Q18b – Reason:			
N/A	SUDS/7	Does not agree. States that pollution related to the construction of houses and roads is adding to climate change.	Noted. The SuDS SPD seeks to address the impacts and implications of climate change, in particular, flooding. The SPD does not influence

			the quantity of growth Proposed. No further action proposed.
N/A	SUDS/9	Agrees with the proposed guidance regarding SuDS and climate change but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding SuDS and climate change but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	Agrees with the proposed guidance regarding SuDS and climate change but no reason given.	Noted.
Persimmon Homes	SUDS/12	Agrees with the proposed guidance regarding SuDS and climate change but no reason given.	Noted.
Environment Agency	SUDS/13	Very much support the proposed guidance.	Noted.
Q19a – Do you agree with the proposed guidance relating to long term maintenance of SuDS?			
Q19b – Reason:			
N/A	SUDS/7	Does not agree with the proposed guidance regarding the long term maintenance of SuDS but no reason given.	Noted.
N/A	SUDS/9	Agrees with the proposed guidance regarding the long term maintenance of SuDS but no reason given.	Noted.
N/A	SUDS/10	Agrees with the proposed guidance regarding the long term maintenance of SuDS but no reason given.	Noted.
Nottinghamshire Wildlife Trust	SUDS/11	States that the following management principles should be included: <ul style="list-style-type: none"> • Management plans are essential for the delivery of wildlife and people benefits. Develop a plan that has wildlife and people at its heart and that is simple and easy to understand. Involve local people in this process. • Be aware of the presence of protected species (e.g. bats, birds in the breeding season, water voles and great crested newts), site designations and other legal duties and manage accordingly. • Seek expert advice from ecologists to produce a plan which protects and enhances all wildlife including legally protected species. • Engage communities in SuDS and their wildlife through site interpretation and events programme. 	Agree. Action: New justification paragraph included at 4.19.6 which states: <i>“The following Management plans principles should apply in all cases they should:</i> <ul style="list-style-type: none"> • seek to deliver benefits for wildlife and people and be simple and easy to understand. • seek to involve local people in the process and engage communities

		<ul style="list-style-type: none"> • Training and supervision of contractors other practical staff and communities involved in SuDS management is essential. 	<p><i>in SuDS and their wildlife through site interpretation and events programme.</i></p> <ul style="list-style-type: none"> • <i>be aware of the presence of protected species (e.g. bats, birds in the breeding season, water voles and great crested newts), site designations and other legal duties and manage accordingly.</i> • <i>seek expert advice from ecologists to produce a plan which protects and enhances all wildlife including legally protected species.</i> • <i>Train and supervise contractors and other practical staff and communities involved in SuDS management.</i>
Persimmon Homes	SUDS/12	Does not agree with the proposed guidance regarding the long term maintenance of SuDS but no reason given.	Noted.
Environment Agency	SUDS/13	Agree with the proposed guidance but would add that inspection and maintenance plans should refer to strict biosecurity measures of all equipment and personnel that contact any water-storing features (to prevent the spread of invasive, non-native species (INNS) and therefore prevent ongoing maintenance issues and costs). INNS management plans / method statements should be drawn up for any that are identified.	Agree. Action: Add Criteria G of SuDS SPD 19 guidance to read: <i>"G. Inspection and maintenance plans should identify how they intend to adhere to strict biosecurity measures of all equipment and personnel to prevent the spread of invasive, non-native species."</i>
Q20 – Do you have any other questions or comments?			

N/A	SUDS/1	Suggests we stop building houses everywhere. States that all those responsible are well aware that over-development is the primary reason for flooding.	Noted. The SuDS SPD largely seeks to address the impacts and implications of climate change, in particular, flooding. The SPD does not influence the quantity of growth Proposed. No further action proposed.
N/A	SUDS/2	Asks where in Mansfield district has been subjected to flooding. Questions why we have an issue as limestone is one of the best natural stones for drainage. Considers that location of new development is the key factor. Questions why council's allow speculative warehouse developments which lay dormant and collect rainwater. Lakes put in on such developments then raise the water table.	Mansfield District has multiple examples of flooding. Most notably in the town centre. Underlying rock type is only one factor in the propensity to flood. Other issues include topography, soil type and manmade drainage solutions. Most major planning applications are required to demonstrate that they can be satisfactorily drained. No further action proposed.
MDC Councillor	SUDS/3	Thanks us for the information and states it is interesting and helpful.	Noted.
Derbyshire and Nottinghamshire Local Enterprise Partnership	SUDS/4	No comments.	Noted.
N/A	SUDS/5	Comments mainly refer to complaints regarding the development standards of the Royal Estate in Market Warsop and have been passed on to the relevant planning officer and the enforcement officer. In relation to the SuDS SPD the consultee is concerned that it will not be respected and implemented by large developers, as the LPA does not appear to take enforcement action against them when they don't meet standards. Asks what plans the LPA is putting in place to ensure construction work is comprehensively checked (under and above ground) to ensure: 1) it complies with its planning permission;	Noted. The purpose of the SPD is to apply guidance for all future planning applications. It is not possible to comment in detail on previous schemes that are well advanced. The Council's enforcement process allows breaches of planning control to be investigated and rectified where

		<p>2) it is built to legal standards;</p> <p>3) it complies with the agreed landscaping scheme;</p> <p>4) any Environmental Impact Reports are carried out before construction commences;</p> <p>5) it respects any buffer zones that are required.</p> <p>Asks if there will be a meaningful (i.e. legally enforceable) inspection process included within the plans.</p> <p>Asks which organisation is to take responsibility for excess flooding in 5 - 10 years time due to poor construction.</p> <p>Asks that relevant information is shared regarding large residential developments in the district.</p>	<p>expedient. This includes where breaches are in relation to matters of drainage. No further action required.</p>
Natural England	SUDS/6	<p>No specific comments on the SPD although provide some general information on biodiversity enhancement, landscape enhancement, protected species and strategic environmental assessment / habitats regulations assessment. Requests further consultation with NE if changes are made that would significantly affect the plans impact on the natural environment.</p>	<p>Noted.</p>
Forestry Commission	SUDS/8	<p>The Forestry Commission provided some general advice on trees for use during the preparation of neighbourhood plans. Upon checking (as this is a SPD) the same information was sent through again. Includes information on existing community trees; ancient woodland; deforestation and woodland creation.</p>	<p>Noted.</p>
Environment Agency	SUDS/13	<ul style="list-style-type: none"> • Supports the plans which Severn Trent Water Ltd have for reducing flood risk from all sources within Mansfield. • Strongly advises changing the word 'should' to 'must' in policy wording, where it can be justified. • Advises that the difference between SuDs for surface water (rainfall) attenuation and floodplain storage from river flooding are made clear. (It may not be appropriate to use the same storage area for both as SuDs features may already be full of surface water and not have the same capacity to accept flood flows from river flooding). 	<p>Noted. The SPD cannot set out new policy in addition to the Local Plan. The wording therefore cannot 'insist' on provision but will be a material consideration when decisions are made.</p> <p>The SPD seeks to primarily address issues arising from surface water and its storage. In recognition of the aligned issue of fluvial flooding an additional paragraph has been</p>

		<ul style="list-style-type: none"> Whilst outside the scope of the SPD, advises that provision of additional river flood storage will also benefit flood risk in Mansfield and beyond. Natural flood management measures are an effective catchment-wide strategy to reduce flood risk and can bring many additional biodiversity and amenity benefits. (See fwagsw.org.uk for more information). Advises that there are substantial benefits that can be gained from ‘daylighting’ underground culverted watercourses and restoring their natural shape, bankside habitats and floodplain habitats. 	<p>added to the SPD. Action: New paragraph 1.19 added to read: <i>“The SPD seeks to address SuDS for surface water (rainfall) attenuation as opposed to floodplain storage from river flooding. Flooding from rivers is normally a matter considered during the determination of planning applications. Measures to increase resilience against fluvial flooding are normally considered by the Local Lead Flood Authority and Environment Agency.”</i></p> <p>Noted. The SPD refers to opening culverts where possible.</p>
Severn Trent Water	SUDS/14	<p><u>Page 5, Bullet point 6</u> Supports the approach to deliver well-designed SuDS and understand that there can be financial constraints. States that early consideration of SuDS and how they can be incorporated into the site design can often reduce costs and additional benefits can be achieved. Recommends that early engagement with relevant consultees and architects is encouraged.</p> <p><u>Paragraph 2.1, Bullet point 2</u> Supports the inclusion of the drainage hierarchy and notes that this approach is also referenced within planning practice guidance paragraph 80. As such this should be considered within the planning stage and not just the building regulation stage of development. States it should be clear that SuDS are part of the surface water management process and are an outfall for surface water unless infiltration is viable.</p>	<p>Agree. Action add text to Paragraph 1.20 Page 5, Bullet point 11 to state: <i>“Early consideration of SuDS and how they can be incorporated into the site design can often reduce costs and additional benefits can be achieved.”</i></p> <p>Noted. This is reflected in the Planning Guidance section under 2.2.2. No further action required.</p>

		<p><u>Paragraph 2.12</u> Supports paragraph 2.12, but would recommend that this statement promotes the development of SuDS that complement the work that Severn Trent green recovery project and Mansfield Town Centre Masterplan are undertaking.</p> <p><u>Page 21, Bullet point 1 - Ponds:</u> Supports highlighting that ponds should receive silt-free surface water run-off, but advises that this point is enhanced to recommend that there is at least 1 upstream treatment process on the surface water run-off to manage the conveyance of silt.</p> <p><u>Page 21, Bullet Point 6 - Filter drains and trenches:</u> Recommends that filter drains and trenches also receive silt free surface water to prevent excessive maintenance being required or clogging of the filter drains.</p> <p><u>Paragraph 4.8.5:</u> Supports the principles within the SuDS development table but recommends that at the Masterplan / concept plan showing broad structure and land uses, also considers flow routes and connectivity of SuDS, ensuring that the natural features of the site are utilised in the most effective way.</p>	<p>Agreed. Action: Add sentence at end of 2.23 to state: <i>“The SPD seeks to encourage development of SuDS interventions that complement the work that Severn Trent green recovery project and Mansfield Town Centre Masterplan”</i>.</p> <p>Agree: Action: Add sentence after bullet point 1 of 4.5.8 to state: <i>“There should be at least one upstream treatment process on the surface water run-off to manage the conveyance of silt.”</i></p> <p>Agree: Action: Add sentence after bullet point 6 of 4.5.8 to state: <i>“Filter drains and trenches should receive silt free surface water to prevent excessive maintenance being required or clogging of the filter drains.”</i></p> <p>Agree. Action: Add sentence in row 2 of table at 4.8.5 to state: <i>“...and broad flow routes / connectivity of SuDS.”</i></p> <p>Noted.</p>
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	<p>Sets out some general guidelines, relevant policy wording and supporting text in relation to waste water, surface water, sustainable drainage systems, blue and green infrastructure, water quality and resources, and water supply (policy wording copied below):</p> <p><u><i>Drainage Hierarchy Policy:</i></u> New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.</p> <p><u><i>Sustainable Drainage Systems (SuDS) Policy:</i></u> All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate. All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity. Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.</p> <p><u><i>Blue and Green Infrastructure Policy:</i></u> Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.</p> <p><u><i>Green Open Spaces Policy:</i></u></p>	<p>Agreed. The additional wording adds clarity. Action: Add a paragraph at the end of SUDS SPD 5 that states: <i>“New developments should seek to demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.”</i></p> <p>Noted. This largely repeats other guidance in the SPD and is not considered necessary. No further action required.</p> <p>Agreed. Blue / Green infrastructure can play a part in protecting habitats. Action: Add sentence to paragraph three of SuDS SPD 15</p>
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		<p>Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.</p> <p><u>Protection of Water Resources Policy:</u> New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.</p> <p><u>Water Efficiency Policy:</u> New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.</p>	<p>which states: <i>“Development should where possible create and enhanced blue green corridors to protect watercourses and their associated habitats from harm.”</i></p> <p>Noted. This does not specifically relate to the guidance on SuDS and is more related to groundwater quality which is addressed by policy NE3 of the Local Plan. No further action required.</p> <p>Noted. This does not specifically relate to the guidance on SuDS and is covered by the Building Regulations. No further action required.</p>
Historic England	SUDS/15	<p>Recognises the clear benefits of producing the SPD and states the important of ensuring that the implication of this important policy document does not adversely affect or undermine the historic, physical and social value of the historic environment. States that SuDS need to be designed to ensure no impact upon archaeology, such as draining waterlogged archaeology or introducing surplus water and pollution into archaeological sediments. Suggests ‘Preserving Archaeological Remains’ may be useful to consider: https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/</p>	<p>Agreed. Protection of heritage assets is important. Action: Add clarity to bullet point 9 of paragraph 3.2 to state: <i>“...including impacts on archaeology”</i>.</p>
The Coal Authority	SUDS/16	<p>The Coal Authority have no specific comments, however where SuDs are proposed consideration will need to be given to stability and public safety risks</p>	<p>Noted. The SPD encourages the engagement of professional</p>

		relating to coal mining legacy. Developers should seek advice from a technically competent person.	advisors. No further action necessary.
Nottinghamshire County Council	SUDS/17	<p>Fully supports the preparation of the SuDS SPD and is a partner with MDC in the Severn Trent Water scheme to help manage flood risk and bring wider benefits to people and wildlife.</p> <p>Considers that the SPD will help inform developers of ways in which proposed development can be designed and operated in ways which match the ST Water programme and lead to even greater benefits to Mansfield.</p> <p>The Flood Team support the publication and eventual adoption of the SPD having been involved in its preparation.</p> <p>In relation to Highways, the reference to the potential for highway improvement works to include SuDS (including the Severn Trent investment) is noted.</p> <p>It is expected that all authorities will continue to work together to ensure that drainage of the public highway continues to work effectively and efficiently.</p>	<p>Noted. No further action required.</p> <p>Agreed. No further action required.</p> <p>Noted. No further action required.</p> <p>Noted. No further action required.</p> <p>Noted. No further action required.</p>

6.0 Conclusion

6.1 This consultation focused on the Council's approach to securing, delivering and managing high quality sustainable drainage systems (SuDS) as part of new developments and in retrofitting SuDS into the existing built environment. There was a modest response to the consultation and comments we received were generally supportive. However, the comments received were sufficiently detailed to have helped inform the content of the SPD. There was a mix of respondents representing the public, specific consultation bodies, general consultation bodies and central / regional / local government.

Next steps

6.2 All comments have been considered and will inform the final version. The following changes have been made to the SPD as a result of the consultation:

- A new paragraph 1.19 has been added which seeks to clarify that the SPD primarily seeks to address SuDS for surface water (rainfall) attenuation as opposed to floodplain storage from river flooding.
- Paragraph 1.20 (bullet point 11 pp5) has been extended to encourage early consideration of SuDS in the site design process.
- A new paragraph at end of 2.2.2 (pp 8) indicates that the Planning Practice Guidance relating to Sustainable Drainage systems was updated during the consultation period. A link to the new guidance is provided as a footnote.
- Text has been added to bullet point 9 of paragraph 3.2 (pp14) to clarify that SuDS should take account of their impacts on archaeology.
- Paragraph 4.2 has been amended to refer to 'blue and green' infrastructure.
- The guidance has been made more explicit to support the principle of removing culverts where possible and amends SuDS SPD 15 (pp 45) to reflect this position.
- The SPD document has been amended to emphasise that it supports development that is compatible with the Severn Trent Green Recovery Project and maximises flood risk benefits and biodiversity net gain. A new paragraph 4.3.5 (pp 16) has been inserted to reflect this position.
- The SPD has been amended to recognise that drainage catchments are not always linked and where this is not technically possible to manage surface

water by redirecting it away from the sewerage system. SuDS SPD 2 has been amended with an additional paragraph after bullet point 4.

- The SUDS SPD 3 has been amended to recognise that the type of SuDS that can be used will be influenced by existing site conditions and constraints.
- A new paragraph 4.5.7 (pp21) and footnote has been inserted clarify that the type of SuDS chosen should have regard to the built and historic environment and should refer to Historic England guidance.
- An additional sentence in paragraph 4.5.8 has been added to clarify that upstream treatment of surface water run-off should seek to manage the conveyance of silt.
- Rain Gardens have been added as a suitable solution for small scale SuDS in SUDS SPD 4 (pp24).
- SUDS SPD 5 (pp25) has been amended to clarify that new developments should seek to demonstrate that surface water discharges are carried out in accordance with the principles laid out within the drainage hierarchy.
- Text has been inserted into the table (row 2) in paragraph 4.8.5 to indicate that masterplan / concept plans should seek to show broad flow routes / connectivity of SuDS.
- SUDS SPD 6 (pp 27 / 28) has been amended to recognise that it is not always possible to provide definitive drainage details at outline stage – but that these should be provided as part of reserved matters / detailed applications.
- SUDS SPD 7 (paragraph 3 - pp 31) has been amended to provide guidance that seeks to reduce the potential risk to controlled waters.
- SUDS SPD 8 (para 2 – pp 33) has been amended to be less specific in terms of the Mean Annual Flood rating (QBAR rating). The reference to ‘5l/s per ha’ has been moved to a footnote and described as a rule of thumb.
- SUDS SPD 9 has been amended to provide additional guidance in relation to enhancing the quality of SuDS design and making a positive contribution to townscape and landscape and not simply meeting minimum standards.
- SUDS SPD 12 has been amended in relation to the information requirements for outline applications. A footnote has been added in place of text in the

guidance which indicates that in circumstances where it is not possible to provide all details at outline planning applications planning conditions will be introduced seeking these as part of detailed or reserved matters applications.

- SUDS SPD 12 (Technical information – pp 40) has been amended to add a requirement for submitting design calculations for greenfield or brownfield run-off.
 - SUDS SPD 14 (pp 42) has been amended to add more detailed guidance in relation to SuDS and biodiversity.
 - SUDS SPD 14 (pp 43) has been amended to support creation of linked green networks allowing for the movement of nature and clarifying that wetland creation should act as the last treatment stage of a SuDS management train.
 - SUDS SPD 14 (pp 43) has been amended to encourage use of native species and wildlife friendly plants in landscaping schemes.
 - Additional text has been added to SUDS SPD 15 to clarify that SuDS should create 'blue green' corridors reflecting the importance of water areas in the delivery of BNG.
 - A new paragraph 4.19.6 (pp 48) has been added to clarify the principles underpinning management plans.
 - SUDS SPD 19 (pp 50) has had an additional criteria G that clarifies that Inspection and maintenance plans should identify how biosecurity measures will be put in place to prevent the spread of invasive, non-native species.
- 6.3 The document is due to be adopted in March 2023. Following this, the document will be used to guide developers and inform planning decisions in Mansfield district.

Appendix 1

- Letter (989 letters and 1,677 (similar) emails sent)

Mansfield District Council



Contact: Paul Tebbitt
Your user ID:
Our ref: SUDS_SPD
Direct line: 01623 463200
Email: lp@mansfield.gov.uk
Date: 27 July 2022

Re: Draft Mansfield District Council Draft Sustainable Drainage Systems (SuDS) Supplementary Planning Document (SPD)

You have received this letter because you are listed on Mansfield District Council's Local Plan database. **If you would like to remain included within this database please write back to us confirming so, by 12 September 2022.** We'd be grateful if you could let us know your email address so that we can reduce our paper usage. Please contact us, quoting your reference or username, at lp@mansfield.gov.uk or on 01623 463322 / 463182 / 463200 to update your details, or for further information.

Mansfield District Council is issuing draft guidance that seeks to encourage developers to reduce the impacts of flooding as part of new schemes. The 'Sustainable Drainage Systems Supplementary Planning Document' will sit alongside the council's adopted Local Plan will provide developers with guidance over the best ways to deliver drainage that does not add to flooding problems.

The document will also help promote the £76 million Flood Resilience Programme which Severn Trent Water, in partnership with the district council, are delivering to provide solutions to protect communities from flooding.

The document sets out how the provision of sustainable drainage can help the environment through: reduced flooding; improved biodiversity; enhanced green spaces and public spaces; reduced water pollution; and helping to provide resilience and adaptation to climate change.

You can make comments on the draft SPD from **29 July to 12 September 2022**. All comments received will be used to inform the final document that, upon adoption by Mansfield District Council will be a material consideration when determining planning applications.

Andy Abrahams – Elected Mayor **Mariam Amos and Mike Robinson** – Co-Chief Executive Officers (Interim)
Civic Centre, Chesterfield Road South, Mansfield, NG19 7BH
🌐 www.mansfield.gov.uk 📞 01623 463463 ✉ mdc@mansfield.gov.uk 📘 MyMansfieldUK 🐦 @MDC_News



You can view the document and comment online by visiting our consultation portal: https://mansfield-consult.objective.co.uk/portal/spd/suds_spd or by scanning the QR code on the left with the camera on your smartphone.

Your username is: [Insert username]

In order to make comments online, please contact us quoting your reference or username, at lp@mansfield.gov.uk or on 01623 463182 / 463322 / 463200 so that we can link your account with your email address and send you a password.

You can also view a copy of the document at the Civic Centre and at each county library in the district during the consultation period. Please check opening times, and ensure you follow any social distancing guidelines in place.

Comments must be made in writing and should preferably be sent electronically via the consultation portal or by email to lp@mansfield.gov.uk. Any comments sent by post should be addressed to the Planning Policy Team Leader at the address below and reach the council no later than **12 September 2022**. Please note that any comments you make may be made publicly available. We will process your data in accordance with our privacy statement. This can be viewed at www.mansfield.gov.uk/privacy.

Yours Faithfully



Planning Policy Team Leader
Mansfield District Council

- Press release (29 July 2022) <https://www.mansfield.gov.uk/news/article/9514/have-your-say-on-planning-document-to-help-reduce-flooding>

Have your say on planning document to help reduce flooding

People are being given a chance to help shape proposed planning guidance for developers on how they can reduce the risks of flooding.

Mansfield District Council is running a six-week public consultation from 29 July to 12 September for its proposed Sustainable Drainage Systems Supplementary Planning Document.

The document will sit alongside the council's adopted Local Plan and provide guidance on what types of drainage could be used in new developments which do not add to flooding risks.

It will also support and take a lead from Severn Trent Water's Green Recovery Programme, a £76m project to help to protect communities in Mansfield from flooding.

Sustainable drainage includes things such as landscaping schemes that will soak up rain, or permeable road surfaces that will allow rain to soak away naturally rather than enter and possibly overload the sewerage system.

As well as reducing the risk of flooding, sustainable drainage can also improve biodiversity, enhance green spaces and public spaces, reduce water pollution and help to provide resilience and adaptation to climate change.

The draft document can be accessed and downloaded on the council website in the planning policy section [here \(opens in new window\)](#) and people can take part in the consultation by answering questions at the end of each section using the online or paper questionnaires.

Printed copies of the draft guidance can also be viewed at Mansfield Civic Centre or at libraries within the district. A printed copy can also be provided, in exceptional circumstances, where someone is unable to access the document online. These should be returned in person or by mail.

Cllr Stuart Richardson, Portfolio Holder for Regeneration and Growth, said: "The council is committed to delivering sustainable drainage and reducing the risk of flooding for all our communities to ensure that they are safe, healthy and inclusive.

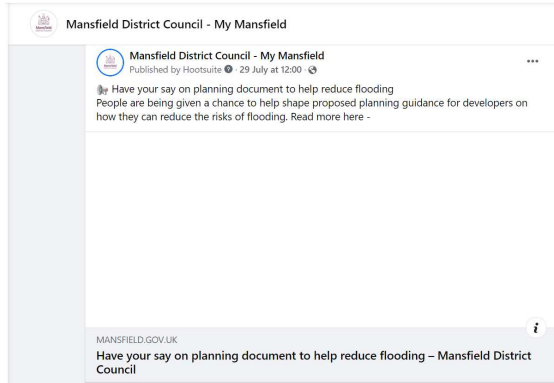
"This guidance encourages all new developments to include sustainable drainage measures that minimise the potential for flooding and encourage other positive impacts for the environment such as increased green space and additional opportunities for plants and animals to thrive.

"The guidance complements the £76m investment in sustainable drainage being made by Severn Trent Water in partnership with the council. As part of this project, Severn Trent is offering top-up funding for certain projects."

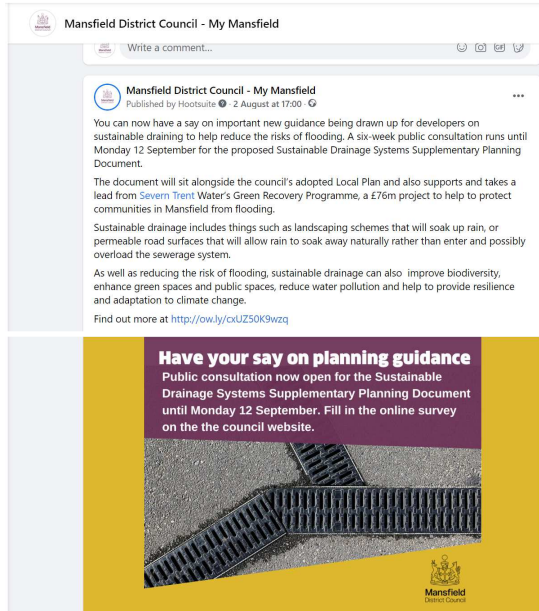
To find out more about council planning policy, visit the council website at www.mansfield.gov.uk/planning-policy.

- Social media posts

• Facebook 29 July



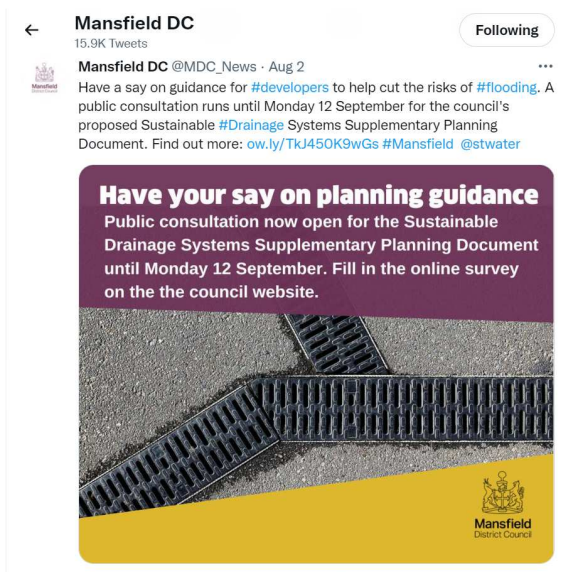
• Facebook 2 August



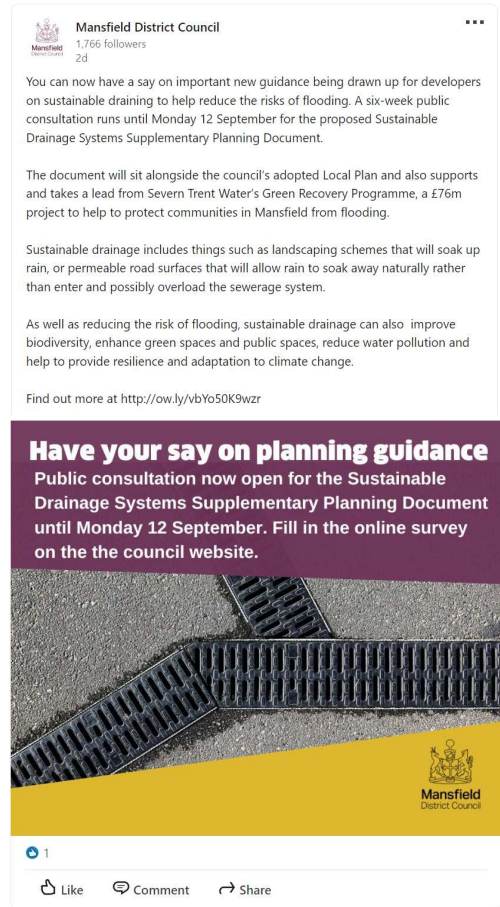
• Twitter 29 July




• Twitter 2 August



• LinkedIn 29 July



- *LinkedIn 2 August*



Mansfield District Council 1,766 followers
1w

📄 Have your say on planning document to help reduce flooding!
People are being given a chance to help shape proposed planning guidance for developers on how they can reduce the risks of flooding.
Read more here - <http://ow.ly/RzAb50K72Nb>

Have your say on planning document to help reduce flooding – Mansfield District Council
mansfield.gov.uk

👍 Like 💬 Comment ➦ Share



Mansfield District Council

Do you want to find out how developers can use Sustainable Drainage Systems (SuDS) to reduce the risk of flooding?



The **Draft SuDS Supplementary Planning Document** provides guidance on what types of drainage could be used in new developments which do not add to flooding risks. Sustainable drainage can also help the environment through:

- improving biodiversity;
- enhancing green spaces and public spaces;
- reducing water pollution; and
- helping to provide resilience and adaptation to climate change.

Available for comment here and online at:

https://mansfield-consult.objective.co.uk/portal/spd/suds_spd



by 12 September 2022

Please send your comments to:

Planning Policy Team, Mansfield District Council,
Civic Centre, Chesterfield Road South, Mansfield, NG19 7BH