

CONSULTATION RESPONSE



PPS25 Practice Guide Questionnaire

August 2007

PPS25 Practice Guide Questionnaire

Please return by Monday 20 August 2007 to
pps25.practiceguide@ciria.org

We would prefer that the questionnaire was completed electronically. However, if this is not possible please post or fax it to PPS25 Practice Guide Consultation, CIRIA, Classic House, 174 – 180 Old Street, London. EC1V 9BP. Fax: 020 7253 0523

Respondent details

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Do you want your response to be treated as confidential? Yes: No:

If yes, please give reason

General questions

G1 Is the guidance clear and easy to understand? Yes: No:

If not, how could it be improved?

Comments:

- Except for the Chapter on Managing Surface Water.

G2 Is the level of detail about right for each topic? Sufficient detail: Too much detail:

Comments:

- Except for the Chapter on Managing Surface Water.

G3 Does the Practice Guide strike the right balance between providing guidance on the principles of implementing PPS25 and not being prescriptive? Yes: No:

If not, how could it be improved?

Comments:

G4 Is there anything which is difficult to follow or understand? Yes: No:

Comments:

G5 Are there any topics which are missing? Yes: No:

If yes, what?

G6 Are the case studies helpful, and are they the best examples to illustrate the points? Yes: No:

Comments:

G7 Does the Practice Guide explain what PPS25 aims to achieve and will it ensure the delivery of PPS25 policy? Yes: No:

If no, why not?

G8 Are any terms missing from the glossary and abbreviations sections? Yes: No:

Comments

Chapter questions

1. Planning and flood risk

Q1.1 Does this chapter convey the importance and benefits of a strategic approach to flood risk management in the planning system?

Yes: No:

Comments:

- Although a diagram showing how paragraph 1.3 issues are linked would be helpful like figure 1.1

Paragraph 1.5 should give more detail about Sewerage Undertakers and their responsibilities within the Water Industry Act and specifically Section 94. This is an issue HBF have constantly brought to the attention of CLG.

Q1.2 Does it give a clear picture of how flood risk is managed through the planning system?

Yes: No:

Comments:

- The only issue is in relation to the paragraph 1.41 and how a Developer can apply the sequential approach if they are only looking at their development.

Q1.3 Is it clear who the stakeholders are and their role?

Yes: No:

Comments:

- However more detail needs to be added to paragraph 1.57 Sewerage Undertaker and what they should be responsible for not only in relation to sewers but also SUDS.

2. The Assessment of Flood Risk

Q2.1 Is this chapter clear on why assessment of flood risk is important?

Yes: No:

Comments:

- We feel paragraph 2.1 should omit the last two sentences about who is an appropriate person on flood risk issues. Such statements seem to convey the views of the people who have drafted the guidance. We are of the view that some FRA's do not need to be undertaken by a person who is Chartered.

Q2.2 Does it provide sufficient information and explanation to take account of climate change?

Yes: No:

Comments:

Q2.3 Does it explain why a Regional Flood Risk Appraisal is needed and how it should be done? Yes: No:

Comments:

Q2.4 Does it explain the importance of Strategic Flood Risk Assessment and how to carry it out? Yes: No:

Comments:

Q2.5 Does it explain where Flood Risk Assessments are needed and how to undertake them? Yes: No:

Comments:

Q2.6 Is the outline FRA pro-forma clear (Appendix C), easy to understand and use, and helpful? Yes: No:

Comments:

- Although this could be made more easily to understand and we would suggest that this is a matter the Steering Group should look at as insufficient time was available to do this when this consultation was published. A Model FRA for certain size of Developments would seem advantageous.

Q2.6a Is it complimentary to the guidance given in the Environment Agency standing advice? Yes: No:

Comments:

Q2.7 Is the process for taking the findings of RFRAs/SFRAs into account when formulating RSS/LDD policy clear? Yes: No:

Comments:

Do you have any examples/case studies of this process with policy outputs?

3. The Sequential and Exception Tests

Q3.1	Is this chapter clear on the flood zones and how to apply them?	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
	Comments:		

Q3.2	Does this chapter make clear how to carry out the Sequential Test and Exception Test?	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
	Comments:		

Q3.3	Does it explain the vulnerability classification and how to apply it?	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
	Comments:		

4. Managing Surface Water

Q4.1	Does this chapter explain the role of planning in surface water management?	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
	Comments:		
	<ul style="list-style-type: none">• This Chapter is disjointed in the way it has been put together and fails to explain the link between Planning and Technical issues.• It should be more focussed in the introduction on the way that surface water can be managed and should set out how Planning is linked in relation to the Technical criteria.• There needs to be a more detailed section on how surface water can be managed on both previous use and Greenfield sites. Addressing the issue of any existing storm water discharge rates.• It is accepted that SUDS is the preferred method of managing surface water yet this Chapter is deficit in the responsibilities of the Sewerage Undertaker who has a duty to provide sewers for hard areas within the curtilage of the plot.• It is accepted that this Guide is related to Planning and PPS25 however there has to be a more integrated approach to both Planning and Technical criteria to explain how the management of surface water is portrayed in the Flood Risk Assessment.• Overall this Chapter does need a great deal of redrafting to be more relevant in explaining how surface water should be managed.• Also this Chapter misses an opportunity to explain Section 106 of the Water Industry Act about the right to connect.		

Q4.2	Is it clear about the importance and benefits of SUDS in retention, storage and infiltration of water to mitigate sources of flooding?	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
Comments: <ul style="list-style-type: none">As an overview, this Chapter does give a broad brush view of the benefits and importance of SUDS. However again a chance has been missed in explaining what are and are not SUDS. It is accepted that this Guide is intended to give more of an overview, but with the increasing importance of how surface water is managed in relation to the recent summer floods as previously stated the management of surface water is equally as important as where developments are located and this chapter should endeavour to bridge the gap between Planning and Technical issues in this area. Unfortunately in its present draft it does not do that.The section on SUDS should be making reference to the Interim Code of Practice for SUDS at the start of this section in the first paragraph not ten paragraphs into the section on SUDS. The Interim Code of Practice is an important document which covers all areas of SUDS not just their maintenance and adoption.			

Q4.3	Do you have any best practice examples of the role of planning in integrating urban drainage, and producing surface water management plans?	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
Comments: <ul style="list-style-type: none">The HBF are not party to this kind of information. However if CLG require us to approach our Members on this matter we would be happy to do so.			

5. Risk Management by Design

Q5.1	Does this chapter explain the design issues in planning to manage flood risk?	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
Comments: <p>Paragraph 5.27 requires more detail on how this concept will be possible in relation to other Government Directives on Land Fill and Waste Management.</p>			

Q5.2	Does it include all the important options for managing risk and making new developments safe?	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
Comments: <p>Paragraph 5.36 needs to refer to Part M of the Building Regulations on accessibility. Raising levels has an affect on access and to be specific gradients.</p>			

Q5.3	Is the any additional supporting guidance you would like include in the Practice Guide?	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
Comments: <ul style="list-style-type: none">As above and needs to refer to the requirements of the Building Regulations. There is a defined linkage in some areas.			

6. Residual Risk

Q6.1 Is this chapter clear about what residual risks are and how they should be managed?

Yes: No:

Comments:

Other comments

Comments:

Ray Farrow