

**Draft Sustainable Drainage Systems Supplementary Planning Document (SPD) consultation comments 2024.**

**Pursuant to regulations 11 to 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012.**

The draft SPD outlines the design principles required to deliver Sustainable Drainage Systems, or SuDS on the Isle of Wight along with advice on including SuDS within any new development.

The consultation ran from Friday 26 January 2024 until Friday 8 March 2024. **A total of 30 representations** were received and the summary of comments can be found below, together with a response from the LPA and also identifying any changes to the draft SPD as a result **(where changes are referenced these are in bold in the final column on the right of the table).**

Representation	Number	Support	Object	No Comment	General Comment	Summary of Comments made during the consultation	Isle of Wight Council's response to the comments <b>and changes to SPD in bold</b>
Statutory Consultees							
Environment Agency- Laura Lax	SuDS07	✓				Welcome the positive and proactive approach that is proposed to ensure that SuDS are an integral part of new development that should be thought about at the earliest possible stages.	Comment noted.  General comment did not result in a change to the content of the document.
Natural Enterprise- Carol Flux	SuDS09	✓			✓	Thoroughly endorse the documents  Request two small amendments:	Comment noted.  <b>General comment did result in a change to the content of the document and change made to text in paragraph 4.2.</b>

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Representation	Number	Support	Object	No Comment	General Comment	Summary of Comments made during the consultation	Isle of Wight Council's response to the comments and changes to SPD in bold
						<p>Para. 4.2 Please can you amend 'Island Rivers' to 'Island Rivers Partnership hosted by Natural Enterprise <a href="http://www.islandrivers.org.uk">www.islandrivers.org.uk</a> .</p> <p>Principle 5.3- if there is a chance of mentioning an avoidance of invasive non-native species this would be useful. I appreciate that they are covered by 'national and local policy on biodiversity' but they have such a love of wet areas it would be good to highlight.</p>	<p>General comment did not result in a change to the content of the document.</p> <p>This point is covered by national and local policy on biodiversity. SuDS designs must contribute to meeting local and national policy on biodiversity as set out in Standard 3b, Principle 3 of paragraph 5.3.</p>
Southern Water-Charlotte Mayall	SuDS20	✓			✓	<p>With regard to <b>sections 1</b> (Introduction) and <b>4.1</b> (SuDS design and the planning process), Southern Water supports the council's expectation that SuDS is considered for all new development.</p> <p>We would encourage a requirement that in every circumstance as a minimum some form of on-site surface water mitigation is mandated, such as slow drain water butts, even in cases where other</p>	<p>Support noted.</p> <p><b>Comment did result in a change to the content of the document. On site surface SuDS are mentioned in several locations in the document, Section 7 in particular. Section</b></p>

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						<p>forms of SuDS, or drainage to a nearby watercourse, is not possible.</p> <p>We also support <b>section 4.6</b> which includes the council's proposals to resist paving over front gardens with impermeable paving, and the requirement for planning permission for anything over 5m<sup>2</sup>.</p> <p>In <b>section 5.1.1</b> which outlines the hierarchy for discharge of surface water, we request that '(e) discharge to combined sewer network' is removed as an option from the list and that the following text is added;  <i>'Discharge to a combined sewer will only be permitted as a last resort where all other options have been robustly demonstrated not to be possible. In these circumstances, surface water inputs to the network should be reduced, and the remainder attenuated as much as possible. Any new surface water inputs from major</i></p>	<p><b>4.4.2 now has explicit reference to slow release water butts</b></p> <p>Support noted.</p> <p><b>Comment noted and change made to the content of the document as per the request.</b></p>

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						<i>housing or commercial development to the wastewater network should also be offset by removing rainwater connections elsewhere in the catchment, for example through retrofitting SuDS as set out in 8.1 of this document. This is to ensure that new development does not contribute to increased occurrence of storm overflows'.</i>	
Historic England-Guy Robinson	SuDS25				✓	<p>Welcome links made between sustainable drainage and the historic environment.</p> <p>The column in Appendix B of the SPD that identifies a SuDS benefit to “Improve historic environment and landscape character”. NB: we suggest adding a tick in this column to the “Island Planning Strategy” and “Local Flood Risk Management Strategy”; both strategies have a heritage resonance.</p> <p>Inclusion of “Conservation of landscape and heritage” within</p>	<p>Comment noted.</p> <p><b>Comment noted and amendment made.</b></p> <p>General comment did not result in a change to the content of the document.</p>

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						<p>the validation checklist (Appendix D).</p> <p>Recommend adding a short subsection in section 3 on the Island's historic environment. Sustainable drainage systems need to be designed so that they do not impact on archaeological remains.</p> <p>Also, as a precursor to the more detailed content in section 3, the SPD could include a line in section 2. For example, in section 2.2 on page 8: "As a result, SuDS features can contribute to a range of site requirements, including Biodiversity Net Gain, habitat corridors, climate change adaptation, and nutrient neutrality and the preservation of archaeological remains."</p>	<p>A validation checklist is provided for major development (Appendix D), "Conservation of landscape and heritage" is included under 'Evidence required' section of the validation checklist. For non-major and minor development, standing advice is provided in Section 4.4.3.</p> <p><b>General comment did result in a change to the content of the document. Brief paragraph on the historic environment included in Section 3.7 of the draft SPD.</b></p> <p>General comment did not result in a change to the content of the document. Comment noted. The SPD required drainage plans at various levels of detail at all stages of the planning process and for Major Applications early consideration should be given to seeking advice and surveys from professionals from relevant disciplines (including archaeologists). Brief paragraph on the historic environment included in Section 3.</p>

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						<p>Traditional buildings are at risk from flooding and need to dry out slowly when flood events occur. In section 8 we advise adding a line in section 8.1 that helps to avoid unintended consequences from retrofitting SuDS e.g.</p> <p>“Traditional buildings are at risk from flooding and need to dry out slowly when flood events occur. Care should be taken to avoid inappropriate retrofitted measures that would prevent effective drying and shorten the life of traditional buildings.”</p>	<p><b>General comment did result in a change to the content of the document. Line added in section 8.1 that helps to avoid unintended consequences from retrofitting SuDS.</b></p>
Natural England-Emma Taylor	SuDS30			✓		Natural England has no further comments on the documents, it's very detailed which we welcome.	No comment noted.
Isle of Wight Council							
Rebecca Loader-Archaeology and Historic Environment Service	SuDS26				✓	The implementation of Sustainable Draining Systems has the potential for significant impact on the historic environment, particularly on	Comment noted. The SPD required drainage plans at various levels of detail at all stages of the planning process and for Major Applications early consideration should be given to seeking advice and surveys from

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						<p>below ground archaeology and paleoenvironmental deposits, which are generally invisible and undesignated.</p> <p>Consideration of the historic environment should be factored in when designing schemes.</p> <p>It is helpful that the SPD requires drainage plans at various levels of detail at all stages of the planning process.</p> <p>As always, we would recommend consultation with the Council's Archaeology and Historic Environment Service at the earliest opportunity. I wonder if Section 3 of the guidance should include a brief paragraph on the historic environment.</p>	<p>professionals from relevant disciplines (including archaeologists).</p> <p><b>Comment noted. General comment did result in a change to the content of the document. Brief paragraph on the historic environment included in Section 3.7 of the draft SPD.</b></p>
Parish/Town Councils							
Sandown Town Council- Cllr Jenny Hicks	SuDS01				✓	Better drainage, gully initiatives and ditching of land to prevent flooding onto roads, flooding of	General comment did not result in a change to the content of the document.

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						businesses and homes should be a feasible solution.	Sustainable Drainage Systems, or SuDS, are a way to manage surface water by mimicking the way that rainwater drains in a natural landscape. The aim , to slow the flow of water reducing the risk of flooding and runoff causing pollution.
Shanklin Town Council- Town Clerk	SuDS14			✓		Members noted the consultation document and resolved that members would comment individually if they so wished.	Noted.
Northwood Parish Council- Parish Clerk	SuDS18	✓			✓	Support the proposal of the Draft SuDS SPD provided it can be put into practice.  Confirmation that the existing SuDS requirements are being fully complied with in all relevant large scale developments applications.	General comment did not result in a change to the content of the document.  Outside the remit of this draft SPD. However, the draft SPD is a bit of a pre-cursor to what government have promised – which is for SuDS to become mandatory for all new development through the implementation of Schedule 3 of the Flood & Water Management Act – the key to making something mandatory and it then becoming a success is the funding that goes alongside it. So the ability for LPAs to adequately fund monitoring and enforcement is key.  The Planning Service will review the comments made. They will consider if any

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						When the draft SuDS SPD comes into effect that the new rules would be applied retrospectively to all applications that have not yet been determined.	changes need to be made to the document. The Draft SPD will then be taken to Cabinet in May 2024 where Councillors will be asked to formally adopt the SPD. If they are adopted the SPDs will be used as a material consideration when determining planning applications at this point.
Newport and Carisbrooke Community Council-Clerk	SuDS19	✓				Members pleased policy has been brought forward and that is covers water retention. Whilst a positive policy, members are concerned that some SuDS may not work long term, as they would require maintenance. This needs to be taken into consideration.  Members would like to request a further briefing on this.	Support noted. General comment did not result in a change to the content of the document.  The SPD is intended to assist IWC, developers and property owners to deliver SuDS which have a clear responsibilities for future maintenance and management.  Noted.
Cowes Town Council-Town Clerk	SuDS23				✓	Building control need to monitor carefully to ensure this complies.  P17-35 of the document relates to Flood risk. The breakwater situation needs to be looked at	General comment did not result in a change to the content of the document. Comment noted. Building Control are aware of the Draft SPD and will provide feedback.  Comment noted. This is part of a wider issue and outside the control of the draft SPD.

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						<p>as the breakwater has changed the tide in the Medina which could result in a flood risk for East Cowes. There is also a silting issue in the Medina meaning things do not flow away.</p> <p>P39 - there is contaminated land at the Medina, be aware of this as this used to be a land fill site. Concern around contaminated land next to water.</p>	<p>Comment noted.</p>
Wootton Bridge Parish Council- Cllr Alistair Dolan	SuDS28				✓	<p>Fully support any attempts to regulate the way rain water enters our waste water system.</p> <p>The SuDs (Sustainable Drainage) report must compliment the bigger picture of Sewerage Infrastructure changes to avoid overwhelming and resultant discharge into the seas off our coastline.</p>	<p>General comment did not result in a change to the content of the document. Noted.</p> <p>Comment noted. Southern Water as sewerage undertaker is a statutory consultee for planning applications as detailed in Table 4.1 of the draft SPD. To ensure a viable drainage strategy, Southern Water must be contacted before submitting a planning application. This will allow agreement of any connections and discharge rates into the public sewer network, as well as adoptable SuDS design standards.</p>

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						Soakaways already full. Rainwater already appears as standing water in the garden. This is apparent on both sides of Palmers Road. So where are we supposed to put this excess water? Piping into the sea avoiding the Sewerage network according to the report is cost prohibitive- you would have to agree. Porous concrete/ tarmac is one coping method that developers could use.	Comments noted.
Fishbourne Parish Council- Cllr Sarah Talbot	SuDS29	✓			✓	<p>I applaud and share the ideology of this document.</p> <p>I note that it states it is there to “encourage’ developers to include Suds in their designs.</p> <p>It should be mandatory that these systems are incorporated in any developments, and that enforcement should be in place to ensure this is done.</p>	<p>General comment did not result in a change to the content of the document.</p> <p>Comment noted.</p> <p>The IWC now expects SuDS to be considered in all new development.</p> <p>The draft SPD is a bit of a pre-cursor to what government have promised – which is for SuDS to become mandatory for all new development through the implementation of Schedule 3 of the Flood &amp; Water Management Act – the key to making something mandatory and it then becoming a success is the funding that goes alongside it. So the ability for LPAs to adequately fund monitoring and enforcement is key.</p>

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Public Comments							
Celia Williams	SuDS02				✓	Development of greenfield site for the development of 9 housing – Steyne Road. No wonder flooding getting worse.	<p>General comment did not result in a change to the content of the document.</p> <p>Since April 2015, SuDS have been a statutory requirement on all major development, and are approved through the planning system. <a href="#">Paragraph 4.1</a> of the Draft SuDS SPD -January 2024, set out major development requirement for SuDS (and includes the requirement for residential developments of 10 dwellings or more).</p> <p>However, since then, updates to the National Planning Policy Framework (NPPF) (2021) and Planning Practice Guidance (NPPG) (2022) have strengthened the requirement. The Isle of Wight Council (IWC) now expects SuDS to be considered within all developments, regardless of their scale and this requirement is set out in the Draft SuDS SPD.</p> <p>Sustainable Drainage Systems, or SuDS help to manage flood risk to homes, businesses, roads and services on the Isle of Wight. They control the amount of rainfall and pollutants which flow off paved surfaces, and enter the island's</p>

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							rivers, and eventually the sea. Well-designed SuDS also contribute to our resilience to climate change, and provide habitats for native wildlife on the island. They also provide places for communities to meet, play, exercise and enjoy nature.
Keith Herbert	SuDS03				✓	<p>Welcome publication of the SuDs SPD.</p> <p>Rather than expectation of consideration of SuDS. Expectation and consideration are flexible terms that fall short of mandatory.</p> <p>Concern over current level of resources in the planning department to permit/adopt new SuDS.</p>	<p>Comment noted.</p> <p>General comments did not result in a change to the content of the document.</p> <p>Since April 2015, SuDS have been a statutory requirement on all major development, and are approved through the planning system.</p> <p>The Draft SPD has taken account of up to date requirement. Updates to the National Planning Policy Framework (NPPF) (2021) and Planning Practice Guidance (NPPG) (2022) have strengthened the requirement for SuDS. The IWC now expects SuDS to be considered in all new development.</p> <p>The draft SPD is a bit of a pre-cursor to what government have promised – which is for SuDS to become mandatory for all new development through the implementation of Schedule 3 of the Flood &amp; Water Management Act – the key to making something mandatory and it then becoming a success is the funding</p>

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						<p>Could document link to other Council drivers such as LNRS, BNG, Net Zero etc.</p> <p>The LLFA should use this document to improve the drainage of the highway network and not just new development.</p> <p>SuDS should become mandatory in all highway schemes, regeneration schemes and works on Council property. The Isle of Wight Council should look to install sustainable drainage at every opportunity.</p>	<p>that goes alongside it. So the ability for LPAs to adequately fund monitoring and enforcement is key.</p> <p><b>Paragraph 2.2 discusses the benefits of using SuDS. SuDS features can contribute to a range of site requirements, including Biodiversity Net Gain, habitat corridors, climate change adaption and nutrient neutrality. Further text added on BNG in Section 2.5.</b></p> <p>Section B lists other policies and legislation SuDS can support. The list can be found on page I of the document. Link to Biodiversity Net Gain can be found in the References.</p> <p>Comment noted. The Draft SuDS has taken account of up to date requirements and made clear in the document that the IWC now expects SuDS to be considered in all new development.</p> <p>Comment noted. The document sets out requirements for residential and commercial development. SuDS should also be implemented to manage surface water in other types of development, this includes schools, mineral and waste development, consent for works to watercourses.</p>

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						<p>Welcome clarification that planning permission is required to pave 5m2.</p> <p>Documents could improve water quality around Isle of Wight beaches. Could allow stormwater connections from development into its highway network.</p>	<p>Comment noted.</p> <p>Comment Noted. The document does talk about a process known as 'SuDS retrofitting'. Where SuDS are incorporated after the initial development of an area, or are used to improve the existing drainage situation.</p> <p>By using SuDS to disconnect the existing drainage system from sewers or highway drains, and to direct it into a watercourse, or allow it to infiltrate into the ground is an alternative solution. Although it is recognised this may not be an appropriate solution in all cases.</p>
Keith Herbert	SuDS04				✓	<p>My understanding of Schedule 3 of the Flood and Water Management Act is that SuDS would be mandatory for all new developments. This would not allow the expectation of consideration referenced in this draft policy. Should schedule 3 be implemented in England in its current form, I do not feel this</p>	<p>General comment did not result in a change to the content of the document.</p> <p>Changes to SuDS approval: In January 2023, Defra announced a decision to implement Schedule 3 of the Flood and Water Management Act 2010 in England. This will introduce a new framework and national standards for the approval and adoption of SuDS in England, and will make Unitary and County Councils SuDS Approving Bodies. It will</p>

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						draft policy would be compliant with the legislation.	also remove the automatic right for surface water drainage to connect into the public sewer system. The UK Government is currently considering how Schedule 3 will be implemented. This SuDS SPD will be updated once these details are available. Above information is taken from paragraph 2.6 of this document.
Chani Courtney	SuDS05				✓	<p>Outstanding work</p> <p>2.5 references the circa manual for design consultations. As this is an expensive resource for smaller island based business to obtain, how will the council facilitate access to this document?</p> <p>3.3 Statement of site specific assessments is this relating to core samples for small excavated strips on proposed sites? How will these results be recorded and shared to prevent additional load and delays for contractors implementation?</p> <p>3.4 Says what is not acceptable fairly for the CCMA, I appreciate the section referenced in the</p>	<p>Noted.</p> <p>The Council are unable to make this document freely accessible.</p> <p><b>A link has been added to BS and ICE guidance on ground investigations.</b></p> <p>Beyond the scope of the SPD to address this.</p> <p><b>Comment noted and further text added accordingly.</b></p>

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						<p>appendix A and 7.6 shows a great and expansive list of acceptable alternatives, but the wording in the main text doesn't fairly link your hard work in the appendix towards positive solutions.</p> <p>3.7 If effluent discharge has the higher capacity for increased nitrate load, perhaps labouing the link between slowing the flow at all levels of catchment using SUDs could have been laboured here again as the link was so well made in section 2.</p> <p>3.9 Misses an opportunity to show that SUDs could play a part in helping water sink into aquifers outside of the CCMA and again as you pointed out in a previous section provide a water resource for gardens with storage. Perhaps even bring in grey water SUDs as a thought here.</p> <p>4.3.1 Will there be an approved list of these relevant professionals and what would</p>	<p><b>Comment noted and further text added accordingly.</b></p> <p><b>Comment noted and further text added accordingly.</b></p> <p><b>The Council are unable to recommend commercial businesses.</b></p>

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						<p>be the process to be listed if there were a directory of some kind?</p> <p>4.3.2 The LLFA must be satisfied that the drainage proposals are viable and will meet the Isle of Wight local SuDS standards, national SuDS standards and planning policy. How will you achieve this?</p> <p>4.3.6 Please reference 6.2 here.</p> <p>4.4.2 Amazing and accessible section. Could slow release water butts be added?</p> <p>5.1.1, Why is it not about highways line surface water rather than sewer?</p> <p>6.1 Will the council run training courses for contractors, developers and estate agents to ensure this level of care?</p> <p>6.1.2 Will this be harder to achieve in winter? Will that be taken into account with planning consent timetable?</p>	<p>Issue will be covered in the revised Local Flood Risk Management Strategy (LFRMS).</p> <p><b>Reference added.</b></p> <p><b>Reference added.</b></p> <p>Highways lines will often feed into surface water sewers (where these are separate to foul) – 5.1.1 is about where SuDS discharge to and surface water sewers are the destination referred to here rather than highways lines.</p> <p>This will be resource dependant and is outside the scope of the SPD.</p> <p>Appropriate site management will need to be addressed in construction method statement, which would normally be conditioned as part of any planning permission.</p>

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						<p>6.3.1 How will these ongoing maintenance listings be made available to the public and parish/ town councils?</p> <p>8. Yes!! Please link to lower use of combined sewage overflows and lower risk of pollution sources entering the Solent. Aware you have already made this point elsewhere.</p> <p>8.2 Great to see Southern work, but there are other contractors and examples on the island that could have been used in addition.</p>	<p>Comment noted – this will depend on how the council are expected to manage the implementation of Schedule 3 of the F&amp;WMA.</p> <p><b>Reference and link added.</b></p> <p>Comment noted. Further examples can be referenced on the website and in future iterations of the SPD.</p>
Paul Mitchell	SuDS06				✓	<p>It is recommended the requirement for householder applications is removed.</p> <p>Who is going to Police this?</p> <p>If householder applications must remain, perhaps they should apply to large extensions</p>	<p>General comments did not result in a change to the content of the document.</p> <p>The draft SPD is a bit of a pre-cursor to what government have promised – which is for SuDS to become mandatory for all new development through the implementation of Schedule 3 of the Flood &amp; Water Management Act – the key to making something mandatory and it then becoming a success is the funding that goes alongside it.</p>

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						(say over 75 or 100m2 for example).	So the ability for LPAs to adequately fund monitoring and enforcement is key.
Christine Priest	SuDS08				✓	Recommend all future housing collects and recycles rain water. Legislation required.	<p>General comment did not result in a change to the content of the document.</p> <p>Since April 2015, SuDS have been a statutory requirement on all major development, and are approved through the planning system.</p> <p>Updates to the National Planning Policy Framework (NPPF) (2021) and Planning Practice Guidance (NPPG) (2022) have strengthened the requirement for SuDS.</p> <p>The Draft SPD has taken account of up to date requirements and now expects SuDS to be considered in all new development.</p> <p>The draft SPD is a bit of a pre-cursor to what government have promised – which is for SuDS to become mandatory for all new development through the implementation of Schedule 3 of the Flood &amp; Water Management Act.</p>
David Millar	SuDS10	✓			✓	Supportive of SuDS	<p>Support noted.</p> <p>General comments did not result in a change to the content of the document.</p>

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						<p>Implementing SUDS needs proactive action to ensure private dwellings are supporting this issue.</p> <ol style="list-style-type: none"> <li>1. Make the paving of a front or side garden with impermeable material subject to planning permission.</li> <li>2. Any front or side garden which has had, or plans to have, over 40% impermeable paving should be subject to a significant percentage increase in council tax.</li> <li>3. A dwelling on a bus route, or with double yellow lines outside, should be allowed an exception from the tax increase but only so far as permitting 40% of the garden, or hardstanding for one car, whichever is the less.</li> </ol>	<p>Comment noted. The draft SPD is a bit of a pre-cursor to what government have promised – which is for SuDS to become mandatory for all new development through the implementation of Schedule 3 of the Flood &amp; Water Management Act.</p> <p>As well as residential and commercial developments, SuDS should also be implemented to manage surface water in other types of development.</p> <p>Section 4.6 of the draft SPD does address- Applications to pave front gardens. “The paving of front gardens with hardstanding is strongly discouraged, as it has a significant cumulative impact on flooding and pollution of watercourses, as well as putting pressure on the local highway drainage systems and sewer networks”. The section goes on to say, “ Planning permission is required for proposals to cover more than 5 square metres of a front garden with hardstanding, which do not provide for the surface water to run to a permeable area”.</p> <p>Types of development signalling a percentage increase in council tax is outside the remit of this draft SPD.</p>

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Martin Rayner	SuDS11				✓	Put back ponds. Most have been filled in or silted up.	<p>General comment did not result in a change to the content of the document.</p> <p>Comment noted. Paragraph 2.1 of the draft SPD discussed what SuDS are and the benefits of using them. SuDS aim is to slow the flow of water and one way of doing this is through storing water on the surface in ponds and basins (also known as attenuation). Paragraph 4.4.3 mentions existing flow routes and drainage features within the site. These should be identified and preserved (e.g. ditches, seasonally dry watercourses, historic ponds).</p>
John Bayliss	SuDS12				✓	Less building and hard surfaces. With higher sea levels due to global warming and the island slowly dissolving only a concrete wall around the island and a great big pump might help ???	<p>Noted. General comment did not result in a change to the content of the document.</p>
Jeanie	SuDS13				✓	<p>Roadside ditches to deal with run-off water are no longer maintained.</p> <p>Regular road drain cleaning does not appear to be</p>	<p>General comment did not result in a change to the content of the document.</p> <p>Although these points are noted, they are not discussed in the draft SPD. The SuDS SPD introduces the concept of SuDS, and outlines the design principles required to deliver SuDS</p>

Appendix 2: Draft Sustainable Drainage Systems Supplementary Planning Document (SPD) summary of consultation comments and changes.

Representation	Number	Support	Object	No Comment	General Comment	Summary of Comments made during the consultation	Isle of Wight Council's response to the comments and changes to SPD in bold
						<p>happening. The camber of some roads exasperates the situation.</p> <p>The Island systems cannot support continuous house building and resultant waste water, we should limit house building and resident rights as in Jersey.</p>	<p>on the Isle of wight. It provides advice on integrating SuDS within any development and delivering the multiple benefit drainage systems expected within the Isle of Wight.</p>
Angie Mee	SuDS15				✓	<p>A few things to considering:</p> <p>How much SuDS cost? If properties have room for them? Maintenance and associated costs of SuDS?</p>	<p>General comment did not result in a change to the content of the document.</p> <p>The NPPG for Flood Risk and Coastal Change states that where cost is included as a reason for not including SuDS, information must be provided to allow comparison of lifetime costs between SuDS and a conventional public sewer connection. This must include the opportunity costs of providing land for drainage components, as well as the maintenance and operating costs. SuDS can bring many benefits including cost savings.</p> <p>There are a range of space-efficient SuDS techniques available where there is limited space. More detail can be found in paragraph 7.10 of the draft SPD.</p>
Carol Doe	SuDS16				✓	<p>To reduce and alleviate the risk of flooding stop allowing new</p>	<p>General comment did not result in a change to the content of the document.</p>

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Representation	Number	Support	Object	No Comment	General Comment	Summary of Comments made during the consultation	Isle of Wight Council's response to the comments and changes to SPD in bold
						housing, particularly larger housing development on greenfield sites. When it rains run off is increased. Water runs into overloaded sewers.	<p>The subject of not allowing new housing development is outside the control of the draft SPD.</p> <p>Since April 2015, SuDS have been a statutory requirement on all major development, and are approved through the planning system.</p> <p>SuDS help to manage flood risk to homes, businesses, roads and services on the Isle of Wight. They control the amount of rainfall and pollutants which flow off paved surfaces, and enter the island's rivers, and eventually the sea. Well-designed SuDS also contribute to our resilience to climate change.</p>
Glyn Onione	SuDS17				✓	<p>Generally, an exceptionally good piece of work.</p> <p>Any water-based remediation or containment system required space, and on a development site that can mean reducing housing density to accommodate a suitably scaled SUDS.</p>	<p>General comment did not result in a change to the content of the document.</p> <p>Noted.</p> <p>There are a range of space-efficient SuDS techniques available where there is limited space. More detail can be found in paragraph 7.10 of the draft SPD.</p>

Appendix 2: Draft Sustainable Drainage Systems Supplementary Planning Document (SPD) summary of consultation comments and changes.

Representation	Number	Support	Object	No Comment	General Comment	Summary of Comments made during the consultation	Isle of Wight Council's response to the comments and changes to SPD in bold
						<p>We need more ambitious SuDS and constructed wetlands on the Island.</p> <p>These should be designed and included at the earliest stages of the planning process.</p> <p>Try and tie in biodiversity net gains and nutrient neutrality benefits into the same scheme.</p> <p>Continue as you are doing to get 'our islanders' on side and involved on a house by house basis.</p>	The following comments are noted.
Mark Page	SuDS 21				✓	<p>Obvious that Morton Common Road, will continue to flood on a regular basis.</p> <p>Building up the height of the road would solve the constant problems this flooding produces.</p>	<p>General comment did not result in a change to the content of the document.</p> <p>Comments noted. The subject of Morton Common Road is outside the control of the draft SPD.</p> <p>SuDS help to manage flood risk to homes, businesses, roads and services on the Isle of Wight. They control the amount of rainfall and pollutants which flow off paved surfaces, and enter the island's rivers, and eventually the sea. Well-designed SuDS also contribute to our resilience to climate change.</p>

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Representation	Number	Support	Object	No Comment	General Comment	Summary of Comments made during the consultation	Isle of Wight Council's response to the comments and changes to SPD in bold
Paul Mocroft	SuDS22	✓				I wish to record my support. SuDS should be put in as many places on the Island as possible.	Support noted.
Pete Johnstone	SuDS24	✓				In supporting this Supplementary Planning Guidance I encourage Isle of Wight Council to; Adopt the approach taken in the document. Provide sufficient staffing and financial resources to implement and manage the guidance. Ensure that developers have robust plans for the future management of funding of Sustainable Drainage Systems.	General comment did not result in a change to the content of the document.  Support and comments noted.
Ben Curtis	SuDS 27				✓	The Local Planning Authority granted permission for development in Colwell, Freshwater. This included tarmac along the road from the junction with Colwell Road. The result of this was during periods of rain a constant run of surface water down the tarmac and flooding of property.	General comment did not result in a change to the content of the document.  Comment noted. This is part of a wider issue and outside the control of the draft SPD.  The purpose of the document is to introduce the concept of SuDS, and outline the design principles required to deliver SuDS on the Island. It provided advice on integrating SuDS within any development and delivering the

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Representation	Number	Support	Object	No Comment	General Comment	Summary of Comments made during the consultation	Isle of Wight Council's response to the comments <b>and changes to SPD in bold</b>
						I request that the SPD ensures this cannot happen again.	multiple benefit drainage systems expected within all developments regardless of their scale.