

Maureen Green
Water Management Unit
Northern Ireland Environment Agency
17 Antrim Road
Lisburn
Co Antrim
BT28 3AL

**Quarry Products Association
(Northern Ireland) Limited**
Unit 10
Nutts Corner Business Park
Dundrod Road Crumlin
County Antrim BT29 4SR
Tel 028 90 824078
Fax 028 90 825103
info@qpani.org www.qpani.org

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Sent via email: managingstormwater@doeni.gov.uk

Dear Ms Green,

QPANI Response to NIEA Consultation: Managing Stormwater - A Strategy for Promoting the Use of Sustainable Drainage Systems (SuDS) within Northern Ireland.

The Quarry Products Association NI (QPANI) welcomes the opportunity to comment on the consultation on managing stormwater.

The QPANI is the principal trade association for the quarrying and quarry products industry in Northern Ireland affiliated to the Minerals Products Association (MPA) in the UK. Members of the QPANI produce over 90% of the Northern Ireland's primary aggregates, as well as the major proportion of other construction materials such as asphalt, ready mixed concrete, recycled and secondary aggregates, lime and silica sand. The quarrying industry has good experience of using SuDS type systems as part of their management and treatment of surface water and discharging on their sites. A number of QPANI member companies have also embraced the market manufacturing and producing SuDS products i.e. Permeable Paving and Porous Asphalt solutions.

Please consider our following responses to your consultation questions:

Question 1: Do you agree that traditional drainage systems are inadequate in dealing with the issue of storm drainage in new developments, especially the more intense and increasingly unpredictable rainfall arising from climate change?

Yes, entirely agree.

Question 2: Do you agree that the loss of permeable surfaces which can absorb rainfall is both exacerbating existing drainage problems and creating new flooding problems in the urban environment?

Yes. It is widely accepted that the loss of permeable surfaces is both exacerbating existing draining problems and creating new flooding problem. This is a well documented issue across the UK.

Question 3: Taking account of the increase in flood risk arising from climate change do you agree that alternative options to traditional drainage systems need to be considered and that SuDS should be considered as one such viable option?

Yes. We need to adapt to climate change which is predicted to increase flood and coastal erosion risks through rising sea levels, changing patterns of rainfall and flood flows in rivers, and increased risks from surface water flooding. Taking account of this it is therefore paramount that SuDS be considered as one such viable option. QPANI would go so far in saying it should be mandatory in all urban developments, a prerequisite for sustainable infrastructure.

Question 4: Should the automatic right to connect to a public sewer be amended for new sites and redevelopments?

All connections should be conditional on meeting sustainable drainage objectives therefore it is reasonable that automatic rights will be removed. This should encourage the use of SuDS as a first and best practice option. However, it is noted that on some sites there are no alternatives to discharging to the local sewer.

Question 5: Do you agree that Sustainable Drainage Systems offer mitigation against the current flooding and water pollution problems caused by traditional drainage systems and exacerbated by the intense and increasingly unpredictable rainfall arising from climate change?

Yes. We should be acting on a precautionary basis and take into account climate change predictions. Research on Sustainable Draining Systems has demonstrated the mitigation they provide against flooding and water pollution problems. By encouraging the practice of implementing SuDS this would also stimulate further development and fine tuning of existing and novel SuDS and give an increasing body of knowledge to develop from.

Question 6: Do you agree that a holistic approach involving developers working with a number of disciplines and agencies (planners, drainage engineers, architects, landscape architects, ecologists and hydrologists) from the earliest stage of the planning process can enable SuDS to be integrated into the design of the site thus maximising the flood alleviation and water pollution prevention benefits of SuDS?

Yes. All Government departments should be promoting a holistic and integrated approach to draining management that facilitates the implementation of SuDS, rainwater harvesting and reuse, improving water management and environmental protection, while contributing to Biodiversity and Water Framework Directive objectives.

All relevant stakeholders (abovementioned) form an important element in the planning and design consultation process. This multi-disciplinary approach is well document in the CIRIA Guidance: The SUDS Manual (CIRIA C697), see figure 1

which highlights the broad range of issues that need to be considered and evaluated by all parties for appropriate SuDS planning and design, further confirming the importance of early consultation and design.



Figure 1: SuDS design and planning: issues for consideration¹

Question 7: Do you agree that the benefits of SuDS outweigh the constraints of the system?

Yes most positively, and any constraints identified in system should be looked at. The ideal solutions to drainage design will comprise a number of SuDS components linked together.

Another tangible benefit worth mentioning is that some systems such as Porous Asphalt solutions are contained within the site footprint.

SuDS also provide habitats for wildlife in urban areas and opportunities for biodiversity enhancement. This should not be overlooked.

Question 8: Do you agree that SuDS will be a useful tool in meeting the aims, objectives and requirements of the Policy and legal drivers. If you have indicated no please provide reasons.

Yes. NIEA has identified in the consultation paper the main drivers – Northern Ireland Sustainable Development Strategy, Water Framework Directive, Planning Policy Statement 15, The Floods Directive and intervening outcomes on Climate Change reports.

¹ The SuDS Manual (CIRIA C697)

Question 9: Do you consider that if SuDS are a replacement for existing traditional drainage systems that those who currently pay for the maintenance of those systems should continue to do so? Please state your reasons.

We feel we cannot fully comment on this question. The longterm maintenance and ownership of SuDS, including the costs of such services to Northern Ireland PLC requires further detailed information not supplied in this document.

Question 10: Do you consider that if water charges are introduced a SuDS maintenance charge, instead of a charge for conventional drainage, should be a component of the bill for those customers served by SuDS systems? Please state your reasons.

As above (Q9), more information on costs and proposed charges need to be provided. However, on the principle of employing best available environmental technologies customers could be charged less than conventional systems. This form of financial incentive could be considered as a way of encouraging greater uptake and awareness of SuDS.

Question 11: Do you agree that the proposed recommendations, as set out in Section 7, are a realistic way forward in the promotion of SuDS as the preferred method of storm drainage in Northern Ireland? Please identify any important measures that we may have missed.

Yes, QPANI gives our support to the proposed recommendations. However, we would wish to make some suggestions:

- i. SuDS should be a mandatory requirement in the design and construction of all new buildings and development.

Unless there is a legal requirement to comply with SuDS, there will be a continued limited utilization of the system. It will only be seen as a 'nice to do' add-on rather than embracing the environmental and economic benefits of SuDS. Such legal power for SuDS could be provided for in the Planning System, by merely stating 'where practicable' is creating a loophole in the system (with reference to Rec. 14).

- ii. NIEA, NIW and Rivers Agency should work in partnership with private industry in the Research & Development of SuDS designs and products.

QPANI Members Companies are already manufacturing products for the SuDS market and are successfully completing construction projects throughout the UK and Ireland using their SuDS products i.e. Permeable Paving and Porous Asphalt. Quarries and quarry product manufacturing sites also use SuDS components in management, control and treatment of surface and dirty water on their sites. Government and research bodies should work in partnership with the Quarry Industry in the support of research and development of SuDS technologies.

Question 12: Do you consider that we have identified the correct organisations responsible for each recommendation? Please give your reasons.

Yes

Question 13: What suggestions do you have to further develop SuDS in Northern Ireland?

See reply to Question 11.

Question 14: Can you suggest how SUDS features can be regulated so that they remain effective?

Regular monitoring and inspection should be enforced.

To give all stakeholders evidence of the long term capability of SuDS, an assessment of systems should be introduced for medium and large systems to assess their performance. Meanwhile the performance of conventional drainage systems should not be overlooked.

Conclusion

QPANI commends NIEA on their consultation concerning Managing Stormwater and Promotion of SuDS. We trust you find our submission of benefit; we would also be willing to meet with you and discuss any points further if required.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Gordon Best', is placed over a light grey rectangular background.

Gordon Best
QPANI Regional Director