

## Question and Answer sheet from Anglian Water's Design and Construction Guidance (DCG) webinar on Tuesday 20<sup>th</sup> June 2020.

Thank you for your time during our DCG webinar. During the session we managed to cover the introductory slides (available here), undertake 3 polls, complete one quiz, and answer 20 questions from the audience. The answered questions are listed at the end of this documents, and you can listen back to the webinar to hear our comments.

However, due to time constraints and the excellent audience engagement, this left 30 questions unanswered. The following Q&A sheet, which we have grouped to make it easier to read, should help to answer those questions we couldn't cover. If you have any further queries or need more detail, please contact:

Contact details	Contact for
<b>Doug Mlambo</b> <a href="mailto:dmlambo@anglianwater.co.uk">dmlambo@anglianwater.co.uk</a> <a href="mailto:suds@anglianwater.co.uk">suds@anglianwater.co.uk</a> 07773 940 415	SuDS expression of interest Any technical DCG queries SuDS pre-app discussions Joint pre-meetings with LLFAs/LPAs Presentations/training
<b>Hannah Wilson</b> <a href="mailto:hwilson4@anglianwater.co.uk">hwilson4@anglianwater.co.uk</a> <a href="mailto:planningliaison@anglianwater.co.uk">planningliaison@anglianwater.co.uk</a> 07976 688 423	Any planning application queries Pre-application discussions Joint pre-meetings with LLFAs/LPAs Presentations/training
<b>Jonathan Glerum</b> <a href="mailto:jglerum@anglianwater.co.uk">jglerum@anglianwater.co.uk</a> 07545 435 546	Strategic SuDS queries Any strategic DCG queries Wider engagement with AW on managing flood risk

## Adoption

Question	Answer
Will you adopt features under the road?	Yes – we have always adopted these. Sewer pipes have always been under roads. We also now consider sewers under permeable paving where the local highways adopt the permeable road e.g. in Lincoln. Please speak to us as early in the process when this is a consideration.
How do you calculate the sum you charge for adoption - can you share the methodology with councils looking to improve their own adoption?	WaSCs do not charge a sum for adoption. We only charge S104 inspection fees, which are 2.5% of the total cost of the sewers to be adopted. The unit costs for capital works by WaSCs are regulated by Ofwat and we cannot charge more or make a profit. We only have to recover the costs of the infrastructure that we adopt.
If s104 comes with a requirement from AWS for a 'commuted sum', and the infrastructure is multifunctional is there a sharing of the sum with say POS maintainer	<p data-bbox="807 891 1385 987">There is no commuted sum. Just S104 inspection fees to the Developer of the sewers to be adopted.</p> <p data-bbox="807 1032 1385 1272">The way we will fund the maintenance of the surface water system is through charges on water bills. If SuDS are being adopted as sewers, then we need a way to maintain these. At the moment there are no proposals to either increase or decrease the charge on homeowners.</p>
Does the DCG provide guidance on the principles for deriving maintenance costs?	No – deriving maintenance costs is not relevant to the sewer adoption process. The way we will fund the maintenance of the surface water system is through charges on water bills. If SuDS are being adopted as sewers, then we need a way to maintain these. At the moment there are no proposals to either increase or decrease the charge on homeowners.
What about access/easements alongside a swale, pond or basin in respect to longer term maintenance, what are the requirements?	As discussed during the webinar, this is an area that the DCG has tried to harmonise. Surface water easements are currently being drafted for local practices, and we will consult on these before they are published.
Does the DCG allow for retrospective adoption of SuDS systems already constructed pre implementation date of April 2020, and will AWS be open to this?	No. Any retrospective adoption of systems built before the DCG came into force would need to be dealt with on a case by case basis. For any system to be adoptable though, it would still

	<p>need to meet the positive criteria/meet the test for being a sewer.</p>
<p>Is it possible to share area engineers' details with respective LLFA's? This will make collaborative working better.</p>	<p>We will see how this could be shared with partners. We split the region in two (East and West) and work is distributed amongst these teams as it comes into INFLOW. Please see attached a map showing the East and West areas. If you need to contact your local team, please use the following email addresses:</p> <p><a href="mailto:DeveloperServices-WWSupportEast@anglianwater.co.uk">DeveloperServices- WWSupportEast@anglianwater.co.uk</a></p> <p><a href="mailto:DeveloperServices-WWSupportWest@anglianwater.co.uk">DeveloperServices- WWSupportWest@anglianwater.co.uk</a></p>
<p>To help align the planning/adoption process, once the offer to adopt has been received, it would be good to have AW engineers assigned to each LLFA?</p>	<p>We have 2 Drainage teams, East and West. Dependent on where the application falls we will refer you to the relevant Engineer.</p> <p>The planning and adoption process will remain the responsibility of Hannah Wilson and Doug Mlambo to ensure a smooth process with LLFA/LPAs, whilst the local engineers deal with the technical adoption process.</p>
<p>Is there any advice to developers/consultants on how to improve their submissions?</p>	<p>Appendix B (Procedures) and D (Minimum Information) outline the process to be used by the developer and water company, and what information will be required during the pre-planning, design, adoption and maintenance phases of the work.</p> <p>We also have a SuDS expression of interest form to assist developers with their applications and encourage early engagement and discussions.</p>
<p>How many developments within Suffolk are currently being considered for adoption by AWS</p>	<p>We are still developing how we will monitor and record all applications that are offering SuDS components for adoption.</p> <p>However, as Suffolk is entirely within the AW region for wastewater, all applications with adopted drainage will come through to us.</p> <p>Remember Developers have a choice to offer their SuDS schemes and can submit traditional sewer systems or SuDS for adoption.</p>

<p>Will you adopt permeable paving where this provides betterment to the receiving sewer network? I.e. interception and storage of peak flows</p>	<p>No – permeable paving cannot be adopted as a sewer as it clearly has a primary function of draining the road, and it forms part of the structure of the road.</p> <p>We, however, want to see them used as a source control feature and adopted by the appropriate bodies.</p>
<p>What is the planned extent of adoption for SuDS features?</p>	<p>The DCG is clear that above ground SuDS features will be adoptable up to the 1:100yr + CC level. This not only helps to meet the normal requirements of the LPA/LLFA, but also creates additional resilience on the sewerage network for future generations. A good diagram can be found in the <a href="#">Water UK non-technical guidance, which is on their website.</a></p>

## Pre-app and planning stages

Question	Answer
<p>Will AW be commenting on drainage proposals at the planning application stage?</p>	<p>Yes, we do, but we will only comment on the SuDS scheme if we are mentioned as being the adopting body within the submitted documents.</p> <p>We do encourage early engagement with developers through our pre-app service and will help to formulate their overall drainage strategy, alongside other risk management authorities.</p>
<p>Will AW require property level SuDS included within the overall design to ensure best practice source control before acceptance of S104 adoption?</p>	<p>Yes – we will consider the overall design, inclusive of the private drainage features, thereby ensuring that a holistic scheme is delivered that includes source, site and regional control.</p> <p>The DCG emphasises that we check the entire hydraulics, including private drainage, and make sure that proper maintenance and responsibilities are assigned.</p>
<p>The task will be to get developers, their design consultants and advisors, and LPA officers / decision makers to apply the Philosophy of the DCG</p>	<p>Absolutely – this is where we need the help of everyone involved to promote the DCG. However, remember that the DCG is mandatory for water companies, but not for developers, so ultimately it is the developer’s choice whether they offer their surface water assets for adoption.</p> <p>We work closely with LLFAs and all the LPAs within our region and will continue to encourage good engagement between all parties.</p>
<p>Will AW ensure co-ordination between developer and planning services to prevent confusing messages being given to developers.</p>	<p>We talked about this during the webinar, but it is fair to say that it is not just AW’s role to do this. We all have a role to play in making sure that a coherent message is provided to developers/applicants.</p> <p>We are working hard to improve our service and fill any gaps in the service we currently provide to both developers/applicants, and other risk management authorities.</p>

<p>How will AWS ensuring that the SuDS solution meets the requirements of the NPPF with regard to amenity and biodiversity value?</p>	<p>Not for AW to do this. This is the role of the LPA. We will support the role of the LPA/LLFA to get schemes which offer full benefits of SuDS through insisting on good designs following the DCG.</p>
<p>Will Anglian Water actively encourage more 'natural' SuDS submissions or comment on what a developer/consultant has submitted?</p>	<p>Absolutely, when looking at s.104 and adoption. We will work actively with the developer and certainly encourage a more natural submission, but ultimately this will need to be approved by the LPA, so early discussions are also needed with them to ensure the aesthetics of the site meet their local requirements. Need to pay attention to all 4 benefits of SuDS.</p> <p>We will continue to use our SuDS expression of interest form, whilst our planning responses will remain generic but always stress the preference for SuDS schemes that deliver multiple benefits.</p>
<p>Could we create standing advice in reference to SuDS in Open Space to reduce the amount of pre-app? RW</p>	<p>Have issued some advice previously. Currently updating, so could include something on open Space and we may reference the DCG or the preamble doc to DCG</p> <p>We'll share this via the regional group for approval.</p>

## Discharge Rates

Question	Answer
<p>Re discharge rates - many rural watercourses 1.4 l/s/ha which = expected rates much lower by considering only onsite siltation = increased risk offsite flooding</p>	<p>We do not look at flow rates per se, rather how sediment/blockages are managed upstream. The DCG clearly outlines in Section C7.12 what orifice would be allowable based on upstream source control measures.</p>
<p>LLFAs push for 'offsite' improvements, do AW expect developers to contribute to improve AW assets where connecting to these and condition/capacity is poor?</p>	<p>If a development is connecting to an Anglian Water surface water sewer and there is no capacity to receive the additional flows, then the developer would have to pay 100% of the costs for any improvements required. The need for a developer to fund surface water improvements in this way does not happen very often.</p> <p>Where the site is brownfield they often have an existing connection and we work with them to reduce the rate where possible.</p>
<p>Re. receiving watercourses, some are managed to be high level yet developers have "assumed" a free discharge rate. Is this going to be allowed to continue?</p>	<p>We do not allow this as it will be a misrepresentation of the outfall. We therefore ask for surcharged conditions to be modelled where we pick this up.</p> <p>To assist with this, we need to work collaboratively. Where the IDB or LLFA have more information about drainage in their area, we should challenge this with Developers. We will do our best as well when we review the detailed design, but again this should be undertaken in collaboration with others.</p>

## Miscellaneous

<b>Question</b>	<b>Answer</b>
Would it be possible for AW provide the same training to LLFAs that is given to AW's Developer Services?	We touched on this briefly during the webinar, but yes, our preference would be to share the training with LLFAs and LPAs. There are IPR issues that need to be resolved, and there will likely be a very small charge towards the training, but this is certainly something we are keen to facilitate.
Are you/Water UK looking to remove or make the automatic right to connect conditional (aspiration since 2007)?	Touched on briefly in the webinar – yes, this is being considered at the moment. There are noises coming out of Westminster that this might be something the Government are willing to consider, but in light of the current situation, such an approach cannot be seen to be getting in the way of building homes fast.
If a development is served by SuDS, has been adopted by AW, would the surface water discharge charge per property, be the same as a conventional piped network	At the moment, yes. The way we will fund the maintenance of the surface water system is through charges on peoples bills. If suds are being adopted as sewers, then we need a way to maintain these. At the moment there are no proposals to either increase or decrease the charge on homeowners.



**The following questions were answered during the Webinar. Please watch/listen back to the webinar to hear our answers:**

In low lying areas discharge rates could be lower than 5l/s, particularly small development sites. Are AW going to be rigid with the minimum discharge rate?
Will AW adopt SuDS that are multi-functional? E.g. a basin that also acts as playing fields?
If AW are serious about SuDS adoption is poor old Doug going to get some extra staff?! If this takes off as we all hope it will, he will quickly be overworked!
What if the Water Company discharge rate is set lower than the LLFA requirement, or vice versa?
Is there a limit on the size of the perforated pipe in under-drained swales if serving roads & properties? Developers have flagged the size as an issue...
Who has the final say in planning terms with regard to the SuDS solution. AWS or LLFA?
We have found it tricky in the past to liaise with AW in the pre app stage which is where we would need a good line of communication. How can this be improved?
Do we know how many submissions have been made under DCG so far?
Will AW adopt swale connections to ordinary watercourses (assuming they meet requirements)?
if AW are adopting - we would not expect the LLFA to review the design of this part of the scheme at planning, will this cause problems?
Do you have any examples of sites that are currently approved for adoption to the new standards that you can share with us?
Will AW comment on suitability of SuDS features when responding to planning applications?
How does the DCG affect the SuDS hierarchy?
Will tree's and shrubs be part of the adoption and maintained by AW?
How has the DCG made it easier for developers to build SuDS to the standards required from the DCG and in turn increase the number of SuDS to be adopted?
How influential is planning and the NPPF in relation to the DCG?
Would a pipe to pond/tank submission now be rejected under DCG?
How will this new guidance impact on existing relations between AW, LPA and LLFA during planning applications?
Will AWS be checking the SuDS during construction or will you require a SuDS verification certificate by the developer?

We find a lack of input from WaSCs for major apps. They are generic and no reps at planning committees to defend any objection towards SuDS and flood risk.

Who is responsible for obtaining an easement/right to discharge surface water to a watercourse?  
Is this now the water company's responsibility?

How has DCG impacted on Developer Services Teams?