Appendix B: Report of Consultation

Summary of consultee responses and changes consequent changes to the Final Draft SuDS Guide SPD.

Public consultation September/October 2023

Consultee	**Consultee Response**	**CE Response**
Alsager Town Council	Alsager Town Council thanks Cheshire East Council for the opportunity to comment on its SuDS Guide aimed at developers. Whilst no member of Alsager Town Council has any expertise in this field, we are happy to provide further sets of eyes to check over the material, and have perused the document in this light; as well as attempting to grasp the opportunity to become more aware of new regulations before they come into operation, as well as to query guidance before it is issued. The documentation is formatted in the wide manner which Cheshire East favours – allowing several items to be available on the same page. No doubt Developers will also have large wide screens for analysing these documents, and/or the opportunity to have the full size physical document. However, local communities and householders are more unlikely to all have such equipment, so it would be most useful to communities if Cheshire East were to, at minimum, supply each library in the authority with a physical copy of the guidance. Given the number of links in the documentation, it would also be thoughtful to ensure that each library has at least one wide screen attached to one of its computers. This would make it far easier for residents to access both this guidance and any further guidance that is hyperlinked in context with the document – in the same way that Cheshire East makes possible for developers. Such provision would also allow many residents far easier access to other guidance from Cheshire East which is of the same wide format. The document appears to be very professionally produced, with diagrams and photographs to aid in explanation and understanding of criteria.	Comments noted and the following amendments have been incorporated: Planning policies will not be hyperlinked in the document. All links in the document will be active at the time of publication. Note the comment re: advice for householders/small developments. Whilst this guidance can be used for this scale of development, the Council in the future may choose to produce a summary for use on smaller developments and for householders. Management and maintenance are covered in detail in chapter 6 Management and Maintenance. (pages 66-68) including highlighting the requirement of commuted sums for public adoption by Cheshire East Council (p 66).

	Foreword p3 We recognise the practicality of initially not inserting portraits of local representatives, given that elections took place this year, and committees will have been reorganised. p4 “Key Planning Policies” and “Supporting planning policies and guidance” are emboldened and underlined at the bottom of this page. We presume that these are intended to be hyperlinks themselves, or else to act as a reminder to insert links to the key and supporting planning policies and guidance documents for Cheshire East. At present, as stated on p6, hyperlinks are not operational. p5 Contents page numbers are still to be populated. 1 Introduction to SuDS Good introduction, impressing the reader with the importance of SuDS, and the need to be creative in making a necessary thing also a source of discussion with the community, an assistance to biodiversity, and hopefully, a way of bringing small amounts of beauty to everyday life. 2 Existing Site Drainage Again, seemingly good and thorough explanation. 3 Incorporating Sustainable Drainage Again, a full explanation. However, there is little information for a small developer – for example a local builder building a house; or a person building a one-off home on their land. The reference to the SuDS design team seems a little dismaying for small developments. The importance of location, place and community notwithstanding, would there be any examples of dealing with small sites which small developers could follow? Most examples in the document seem to come from large scale developments. p31No doubt the link to a SuDS calculator will be put into the final document where it is presently missing. 4 Component Design Time reassurance	Para 154 (p 66) states *“It is the responsibility of the developer to establish a maintenance agreement that ensures the drainage system is maintained and continues to function as designed in perpetuity for the lifetime of the development.”* The performance and climate change requirements set out in the documents are consistent with national guidance produced by CIRIA. Planning requirements for driveways are addressed by a note and waymarker on p 40. Reference to Swales being source rather than site control has been corrected.

	No mention is made in this section of the lifetime of these components. We suggest that the document requires that the lifetime of any SuDS should either be the same as that of the developments which they accompany, or if expected to be less, that this should be heavily underlined and further financial provision be required of developers in any submission. The point is clearly made in bold on p64, that the Councils will not undertake maintenance of SuDS at this time. However, there is clear implication that management and maintenance may well fall to Local Authorities in the future, as seem to have happened in the past. For this reason, and from a common sense perspective, we would like to be reassured that Developers, when creating SuDS to remove / alleviate extra water flow resulting from their developments, ensure either that those SuDS will be sturdy/large enough to last the lifetime of the development, or that provision is made for replacement should it be likely that there be a need for replacement of any elements after, for example, 20 or 30 years. It is also imperative that SuDS stand up to the future excesses of climate change that we will face for at least the rest of this century. So if SuDS were to need replacement after XX years, the new SuDS would be likely to be more extensive and expensive than any put in place just for the next XX years. Any financial undertaking for future component replacement should also take that into count. Climate Change Although the Gerional Control section of the document, in particular, requires components to be designed and built to the 100yr + climate change requirement, this has not been shown as a requirement for all source and site controls. Perhaps not every one of the controls are affected by increased rainfall intensity, but we feel that: p36 developers considering green roofs should also be encouraged to encompass Way Marker 4.3 on p70 - the possible increase in rainfall of 40% for intense periods, as this would be likely to, at the very least, load structures far more heavily over short periods.	

	p44 under Hydraulic and Water Quality Design Criteria for infiltration trenches and filter strips, that developers also consider 100 year+ CC rainfall when checking (first bulletpoint) for “design exceedance and modelled explicitly and holistically to demonstrate the impact to the downstream drainage components.” – as this impact would be increased by increased rainfall intensity. p46 in the fourth bulletpoint below Hydraulic and Water Quality Design Criteria, Swales should also consider climate change when being designed to “…form part of a wide blue/green network, designed…design exceedance storm events 30 to 100 year storm event.”, as evidently by 2070 those storm events are likely to be far more severe. SuDS Law? p39 states “It is now a legal requirement in England that new and refurbished driveways in front gardens must be designed to be permeable” This statement raised alarm amongst the Town Council, but we understand that it would only be accurate from Jan 2024, and subject to a 5m2 rule (that only when more than 5m2 of even a front lawn or garden is of an impermeable nature that intervention would be required?) A link to the appropriate law, or an explanation would be gratefully received by ourselves, and, we presume, by other town and parish councils. If this is indeed true at present, or soon to be the case, then we hope that an alert to that fact would be forthcoming in Cheshire East’s email to residents, as well as further information to town and parish councils. We further suggest that vendors of supplies for driveways, and any driveway specialists in and close to Cheshire East should also be alerted – all to help Cheshire East residents from inadvertently breaking the law by - in their minds - improving their drives in an unintentionally ignorant manner without permeability. Mistype? p46 The first statement about Swales in its technical requirements is “Swales should be used as source controls only” (p46) This seems to be an error, as the document puts Swales into the Site Control section of the document, and this is not	

	the impression given by other references about swales, which suggest that they are a cheap form of water conveyancing between SuDS and certainly across sites. e.g.https://www.netregs.org.uk/environmental-topics/water/sustainable-drainage-systems-suds/swales-in-sustainable-drainage-systems-suds/ https://www.sudswales.com/types/permeable-conveyance-systems/swales/ typos p47 Key Characteristics para 4 – “ratio” not “ration” p48 Key Characteristics 2nd bulletpoint – “ratio” not “ration” p52 Key Characteristics bulletpoint 2: “ratio” rather than “ration” p56 Key Characteristics 3rd bulletpoint – “ratio” not “ration” 5 SuDS Maintenance and Management p68 Way Marker 6.1 box refers to Appendix XXX of this guidance. XXX needs to be replaced with the correct Appendix. 6 Planning Approval and Adoption No queries or suggestions 7 Appendices p79 Para SE6 Green Infrastructure, line 3 “enhance” should be “enhancing” Once again, our thanks for this opportunity.	
Bollington Town Council	This is a response on behalf of Bollington Town Council's Planning and Town Development Committee (PTDC) to the Cheshire East consultation on the final draft of the Sustainable (urban) Drainage Systems Supplementary Planning Document (SuDS). We support this document, which emphasises the importance of sustainable drainage systems and aims to reduce, slow and control run-off water by harnessing natural drainage systems in the landscape. It seeks to meet a key objective of the Cheshire East Local Plan Strategy in protecting and enhancing environmental quality in its measures to manage impacts of climate change, including flooding. Cheshire East now requires new development to include SuDS so that surface-water run-off is managed where it falls and the quantity of it is reduced while	No change required

	apparently seeking to improve the quality of such run-off from sites. The plan incorporates the principles of the NPPF and affirms that such water management is an important part of developing safe and sustainable sites and resilience to climate change; this is expected to include managing soils minimising hard surfaces and using soft and permeable surfaces, the collection of rainwater and underground storage structures. In addition, it provides clear guidance to all interested parties, including developers and communities, in upholding the stipulations of the LPS and SADPD and also helpfully signposting them to information and services to assist in meeting those stipulations. We acknowledge that an Equalities Impact Assessment had been drafted in compliance with the duty under s.149 of the Equalities Act in that a final draft will be published alongside the final SuDS document. In our assessment of the scope of this document, we note that it has been prepared to provide consistency with emerging planning policies. It will now be an adaptable planning tool, as in satisfying the SuDS requirement, a planning applicant will be satisfying the design requirement. This will therefore promote a holistic approach so that potential delays and unnecessary financial outlay are avoided. We also note that it is likely to become established as a material planning consideration and also welcome this. We note that the consultation will comply with the "Gunning Principles" and therefore a final decision on this SuDS will be made in the future after all responses to the consultation have been considered. We welcome the document and its proposals and support its final acceptance by Cheshire East Council.	
United Utilities Water Ltd	Thank you for your consultation seeking the views of United Utilities as part of the Development Plan process. United Utilities wishes to make the following comments on the above consultation. We provided initial informal comments by email on 17th June 2021 and these are attached to this letter. This representation should be read alongside with our previous correspondence. Continued communication with United Utilities	Comments noted and the following amendments have been incorporated: Para 251 (p. 77) amended to:- *“If developers intend to offer their proposed surface water drainage*

	United Utilities wishes to highlight that we wish to continue the constructive communication with Cheshire East Council to ensure a co-ordinated approach to the delivery of this SPD. As highlighted in the initial email response, we will support any document that ensures sustainable drainage is considered early in the design process and integrated with other aspects of a site design. Our continued support will be provided throughout the formation of the SPD identifying alternatives to the public sewerage system for surface water discharges. We are therefore seeking to recommend a number of amendments and we are happy to discuss any of this further. Our original email in June 2021 outlined a number of specification differences between the document and what may be acceptable for adoption. It is important to refer to this point for consideration as the points raised within the email are not included in the SPD. We therefore recommend the following wording is considered as part of 6.8 of the SPD: If the applicant intends to integrate Sustainable Drainage Systems (SuDS) within an adoptable solution, the proposed detailed design will be subject to a technical appraisal by UU. The future applicant will need to ensure that the proposal meets the requirements of Sewerage sector guidance, the standards of which are included within the 'Design and Construction Guidance' (DCG) & The CIRIA SuDS Manual. The detailed design should be prepared with consideration of what is necessary to secure a development to an adoptable standard. UU have further information on SuDS adoption requirements on our website Link: https://www.unitedutilities.com/builders-developers/larger-developments/wastewater/sustainable-drainage-systems/ Part 6.3.2 R3 – SuDS Design & Submissions - General Requirements United Utilities would wish to highlight its support of this section but wishes to comment on parts of the policy which we feel should be more consistent with paragraphs 167 of the NPPF. Paragraph 167 of the National Planning Policy Framework (NPPF) outlines that 'When determining any planning applications, local planning authorities should	*network for adoption by United Utilities (UU) they should engage in early discussions with UU to ensure their SuDS design meets UU's adoptability standards."* This is supplemented by way markers to: the SuDS proforma, the Water and sewerage companies adoption information (p. 77) and UU sustainable drainage systems and pre-development guidance (pp. 77/78) Section 7.8 (p 72) sets out the requirements of the NPPF, including that new development should not increase the risk of flooding and the requirement for site-specific flood risk assessment. The guide now includes a way marker link to the relevant UU guidance on p 78. As noted in the comments, the hierarchy is set out earlier in the document on p 32. In relation to previously developed land this is dealt with under: Chapter 4 Selecting Components - Brownfield Sites p 33; 7.8 Development and Flood Risk p. 72 and 7.16 Previously Developed Land p. 74

	ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment'. Noting that not all applications are required to submit a flood risk assessment, United Utilities wishes to outline that this section should set an expectation that all applications will be required to submit clear evidence that the hierarchy for surface water management has been fully investigated to ensure that flood risk is not increased elsewhere. We request that wording is elaborated on in the third paragraph of 6.3.2 so future applicants investigate the surface water hierarchy to minimise the risk of flooding and ensures that future development sites are drained in the most sustainable way. We wish to recommend the following wording as a replacement to the third paragraph in 6.3.2: Surface water should be discharged in the following order of priority: 1. An adequate soakaway or some other form of infiltration system. 2. An attenuated discharge to a surface water body. 3. An attenuated discharge to public surface water sewer, highway drain or another drainage system. 4. An attenuated discharge to public combined sewer. Applicants wishing to discharge surface water to public sewer will need to submit clear evidence demonstrating why alternative options are not available as part of the determination of their application. The expectation from United Utilities will be for future planning applications to demonstrate how the new development is drained in the most sustainable way, by the surface water hierarchy and providing evidence when a more preferable option is discounted. There is an opportunity to directly reference the surface water hierarchy within the SPD. The aims of the SuDS SPD can only be achieved if there is a section of the document that strongly	A new paragraph has been inserted under Brownfield Sites (para 129, p. 33) *"When calculating the brownfield runoff rate, surveying and modelling should be undertaken to confirm how the site currently drains. For example, if the brownfield site is currently drained by a 225mm pipe the brownfield runoff rates should take account of the limits this poses."* All references have been updated to Sewerage sector guidance Appendix C - Design and Construction Guidance

	references the need to follow the hierarchy, as this is fundamental to ensuring the sustainable management of surface water. We note the inclusion of the hierarchy on page 29 of the draft document. This however, should be directly referenced and further on as above in part 6.3.2. Brownfield expectations We recommend the following wording is included as part of 'Brownfield Sites' on Page 38: On previously-developed land, applicants will be expected to follow the surface water hierarchy. Thereafter, any proposal based on a proposed reduction in surface water discharge from a previously-developed site should be in accordance with the non-statutory technical standards for sustainable drainage produced by DEFRA (or any replacement national standards) which target a reduction to greenfield run-off rate. Thereafter a minimum reduction will be required of 30% on previously developed sites and 50% on previously developed sites in any critical drainage area identified through the SFRA. In order to demonstrate any reduction in the rate of surface water discharge, applicants should include clear evidence of existing operational connections from the site with associated calculations on rates of discharge. 6.3.3 – Document reference As highlighted in our email in June, 'Sewers for adoption' has now been superseded by the 'design and construction guidance' (DCG) as part of the sewerage adoption code implementation. We recommend the use of referencing is reviewed throughout the document and we are happy to discuss this further. Summary Moving forward, we respectfully request that the Council continues to consult with United Utilities for all future planning documents. We are keen to continue working	

	in partnership with the Council to ensure that all new growth can be delivered sustainably, in line with the aims of this SPD and associated documents.	
Canal & River Trust	Thank you for your consultation in respect of the above mentioned 'Final Draft Sustainable Drainage Systems SPD'. The Canal & River Trust is a charity entrusted with the care of over 2000 miles of canals, rivers, docks and reservoirs in England and Wales. These historic, natural and cultural assets form part of strategic and local green infrastructure networks, linking urban and rural communities as well as habitats. Our waterways contribute to the health and well-being of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time . To meet the Trust's objectives it is important that all levels of planning policy and associated documents provide a robust policy framework that recognises and supports canals, rivers and docks as a cross-cutting policy theme; and acknowledges the diverse roles which they perform. The Canal & River Trust (the Trust) has the following comments to make on the above document, which is an insightful and comprehensive document. Section 2.2 – Site Constraints - Paragraphs 27 -30 – (Page 14) The Trust support and welcome the inclusion of how applicants 'should seek advice regarding any site-specific constraints which may influence the design of their SUDS' as it is important that ground conditions are investigated and identified to inform the design of proposed SUDs' schemes. Section 3.1 – Integrate with the Natural Drainage System - Paragraph 39 (page 18) The Trust support and welcome in Section 3.1 advice to investigate a site's existing drainage (site's natural drainage and traditional artificial drainage), particularly in different precipitation conditions as some water management functions of canals/drainage channels may not run at all times and are more evident in periods	Comments noted and the following amendments have been incorporated: Para 41 (p 18) extended to include: "*Other traditional artificial routes may be less obvious, such as buried pipes for conveying water. Canal feeder channels (which can be open or piped) and outfalls from weirs and sluices are easier to identify in periods of heavy rainfall and should not be confused with land drainage channels"* Para 52 (p. 20) amended inserting *"e.g. of slopes (embankment and cuttings), retaining walls or loosely consolidated materials. Artificial slopes, such as canal cuttings and embankments, need careful consideration as changes to land drainage arrangements can affect land stability and the structural integrity of these structures"* New bullet point (bullet 6, p. 21) inserted in Issues associated with

	of heavy rainfall. Equally, some canal waterway management functions (piped or open) can be mistaken for land drainage infrastructure. The Trust request the insertion at Paragraph 39 of 'Other traditional artificial routes may be less obvious, such as buried pipes for conveying water. Canal feeder channels (which can be open or piped) and outfalls from weirs and sluices are easier to identify in periods of heavy rainfall and should not be confused with land drainage channels'. Section 3.3 – Integrate with Topographical Drainage - Paragraph 50 (page 20) The Trust strongly welcome Paragraph 50, which highlights the importance of understanding a site's context and outlining that 'geotechnical advice from a suitably qualified ground engineering advisor is likely to be required to ensure ground conditions are suitable for developer's proposals, particularly regarding soil properties, infiltration potential and structural stability.' Drainage in the vicinity of canal infrastructure, particularly cuttings and embankments, has the potential to impact land stability and the structural integrity of these structures. Therefore, it is important to understand any potential impact of drainage arrangements on such infrastructure to safeguard their stability. Therefore, The Trust suggest insertion of e.g. of slopes (embankment and cuttings), retaining walls or loosely consolidated materials. The Trust also suggest insertion of 'consolidated materials. Artificial slopes, such as canal cuttings and embankments, need careful consideration as changes to land drainage arrangements can affect land stability and the structural integrity of these structures'. Section 3.3 – Integrate with Topographical Drainage Text highlighting 'Issues associated with culverted watercourse' below Paragraph 54 - (page 21)	culverted watercourses: *'Existing culverted watercourses, in and adjacent to development sites (including third party owned culverts) can be affected by changes to surface water flows as a result of development, such as the quantity and quality of flow, during construction and in the long term"* Section 4.6 (p. 32) bullet no. 2 - Canal updated by adding *"Any surface water discharge would be dependent on the canal's capacity to receive additional water (quantity, quality and velocity of water) and require prior assessment to ensure the discharge does not contain unacceptable levels of physical, chemical, or biological contaminants. Any discharge would be subject to the completion of a commercial agreement."*

	The Trust support the inclusion of advice regarding ordinary watercourses and maintenance of water flows along them, including through culverts. Existing culverted watercourses, on and adjacent to development sites, can be affected when the quantity, quality and velocity of drainage flows are changed by development proposals, during construction and in the long term. Therefore the Trust would request the inclusion of advice that changes to drainage flows, during construction and in the long term, can affect the flow through and maintenance of existing culverts/culverted watercourses. The Trust suggests inclusion in the text for 'Issues affecting culverted watercourses' of 'Existing culverted watercourses, in and adjacent to development sites (including third party owned culverts) can be affected by changes to surface water flows as a result of development, such as the quantity and quality of flow, during construction and in the long term.' Section 3.3 – Integrate with Topographical Drainage - Paragraph 55 - (page 22) It is relevant to maintaining overland flow routes that the characteristics of overland flow drainage can be changed by development (such as quality and flow rate) and as such it may not always continue to be appropriate to continue to discharge to any existing outfall and or/surrounding watercourse/canal waterway following these changes. Therefore, the Trust wish to highlight that careful review is still required when overland flow routes may be affected by development schemes in accordance with other guidance outlined throughout this SPD document (e.g maintaining appropriate quantity and quality of surface water). Section 4.6 - Discharge and Run-off Considerations - (page 32) With regard to 'Consultation with the relevant bodies depending on the location to which surface water is to be discharged: Point 2 - To surface water bodies – Canal: The Trust request the insertion of "Any surface water discharge would be dependent on the canal's capacity to receive additional water (quantity, quality and	

	velocity of water) and require prior assessment to ensure the discharge does not contain unacceptable levels of physical, chemical, or biological contaminants. Any discharge would be subject to the completion of a commercial agreement.' Section 6.1 - Key Elements of SuDS Management & Maintenance - Paragraph 139 – (Page 66) The Trust support and welcome this paragraph as effective SuDS management and maintenance is crucial, during construction and operation. Section 6.1 - Key Elements of SuDS Management & Maintenance - Paragraph 142 – (Page 66) The Trust support and welcome this paragraph highlighting the importance of ensuring that drainage is considered during the construction phase. I hope these comments are of assistance. The Trust would wish to be kept informed of the progress of this document and thank you for the opportunity to comment.	
Manchester Airports Group 3 separate comments amalgamated)	We acknowledge that minimal change has been made to the document following our response to the draft consultation. However, the substantive requirements that relate to the aerodrome safeguarding process, and the associated statutory consultation procedure with Manchester Airport, have not been incorporated. MAG's objection to this part of the SPD is therefore maintained. By virtue of its importance to the national air transport system, Manchester Airport is an officially safeguarded aerodrome. This is to protect the safe and efficient operation of aircraft at and in the Airport's vicinity. Under the legislative provisions of the Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Sites) Direction 2002 (brought into effect by DfT/ODPM Circular 1/2003) MAG is the statutory Aerodrome Safeguarding Authority (ASA) for Manchester Airport. Development within specific zones or of specific type must be referred to the ASA through the planning application consultation process, allowing for assessment of any impact to aviation safety. Failure of the Local Planning Authority	Comments noted and the following amendments have been incorporated: Section 2.2 Site Constraints (p.14) has been amended to incorporate new paragraphs 31 and 32: *Manchester Airport is an officially safeguarded aerodrome. Under the provisions of the Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Sites) Direction 2002, Manchester Airport Group is the statutory Aerodrome Safeguarding Authority (ASA) for Manchester*

	to take account of the views of the ASA in reaching its decision will result in a referral to the Secretary of State. The provision of SuDS to manage and mitigate surface water drainage is something that the ASA would be consulted on in its Statutory Consultee role in the planning application process. The green and blue infrastructure associated with SuDS, such as the creation of new water bodies, reedbeds, wetlands and other specific planting mixes, are often very attractive to a variety of bird species that are hazardous to aircraft. If the landscape changes created through SuDS provide shelter and/or feeding, roosting, or breeding opportunities for birds, they may, depending on their siting in relation to the aerodrome, cause an increase in the number of birds visiting or overflying the aerodrome or the number of birds in the airspace used by aircraft. This would subsequently increase the risk of birdstrike to aircraft, which arises from birds moving into the path of aircraft, either because they are on the aerodrome itself or because they are crossing the aerodrome or its approaches as they move around the local area. Under the provisions of Circular 1/2003 there must be no new or increased risk of the birdstrike hazard caused by development and the ASA and Local Planning Authority are obligated to avoid increasing the risk of birdstrike within 13km of the Airport. To protect Manchester Airport against potential bird hazards any relevant SuDS provision should therefore be subject to consultation with the ASA at the earliest opportunity, and their recommendations to avoid any increase of the risk of birdstrike, taken on board. The SPD should be robust in stipulating that SuDS must not increase the risk of birdstrike hazard within 13km of Manchester Airport. The aerodrome safeguarding procedures and statutory consultation requirement with the Aerodrome Safeguarding Authority for Manchester Airport should be clearly set out within Section 7.9 'Consultation'. Manchester Airport Aerodrome Safeguarding Authority must be added to the Statutory Consultees that are shown in Figure 7-4: Consultees that are concerned with SuDS, as follows:	*Airport, requiring that development within specific zones and of specific types must be referred to the ASA as a statutory consultee in the planning process. Failure to take account of the views of the ASA will result in referral of the application to the Secretary of State and also risks breaching the Air Navigation Order (articles 240 and 241).* *The provision and design of SuDS can present significant implications for aviation, through their potential for attracting birds that are hazardous to aircraft. The environmental need for sustainable drainage needs to be carefully balanced with the regulatory need to protect the safety of aircraft and aerodrome operations through the process of aerodrome safeguarding. Consequently, any SuDS proposal within the 13km bird hazard consultation zone for Manchester Airport requires consultation with the ASA. The ASA also strongly encourage designers and the LPA to consult as early as possible in the design process, including at pre-*

	• Manchester Airport Aerodrome Safeguarding Authority – consult for all applications within 13km of Manchester Airport that have the potential to increase the risk of birdstrike hazard We recommend the following supporting text also be added: - "Within 13km of Manchester Airport there is a requirement set out in the Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Sites) Direction 2002 (DfT/ODPM Circular 1/2003) to not increase the risk of birdstrike hazard. Any SuDS within the 13km birdstrike hazard consultation zone is subject to statutory consultation with the Aerodrome Safeguarding Authority for Manchester Airport, and their views adhered to in respect of the suitability or otherwise of any proposed SuDS." It is important to note that failure to do so would result in referral to the Secretary of State and risks breaching the provisions of the Air Navigation Order (articles 240 and 241), which is a criminal offence and liable to prosecution. Clearly if a proposed development has had regard to the concerns of the Safeguarding Authority in its formulation, its progress through the planning system will be more straight forward. We therefore strongly encourage pre-application consultation (including at the master planning phase for larger developments) and for Aerodrome Safeguarding requirements to be considered during the initial analysis of a site and throughout the SuDS design process. Given the aerodrome safeguarding implications relating to SuDS, and the statutory consultation requirement with Manchester Airport, Policy GEN 5 'Aerodrome Safeguarding' of the Cheshire East Site Allocations and Development Policies Document should be added to the list of additional relevant policies set out in Appendix B. --- We welcome the text at section 2.2 relating to site constraints, particularly the reference made in paragraph 29 to Manchester Airport's safety zone being a potential land-use constraint that requires consideration during the design of SuDS. However, we recommend that this be supplemented with some additional details on how/ why this poses a potential constraint when considering SuDS schemes. The delivery of SuDS can present significant implications to aviation, through their	*application and in masterplanning larger developments.* The following has been added to Figure 7-4 (p 72):- "***MANCHESTER AIRPORT AERODROME SAFEGUARDING AUTHORITY*** *- consult for all applications within 13km of Manchester Airport that include SuDS"* Policy GEN 5 Aerodrome Safeguarding of the SADPD has been included in Appendix B

	potential for attracting birds that are hazardous to aircraft, and must be carefully balanced with the regulatory need to protect the safety of aircraft and aerodrome operations through the process of aerodrome safeguarding. Legislative provisions regarding the aerodrome safeguarding process are set out in the Town and Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002 (DfT/ ODPM Circular 1/2003) and in accordance with this, Manchester Airport is a statutory consultee for certain planning applications for developments that require safeguarding to protect the airport's operation. The specific detail relating to the process of aerodrome safeguarding and the statutory consultation requirements with Manchester Airport should be communicated within the SPD as per our comments on Chapter 7, Section 7.9. With regard to using the link to the Adopted Policies Map that is provided within the 'Waymarker' on p14 as a means of identifying some of the land-use constraints, please note that the Adopted Policies Map only shows the outer boundary of Manchester Airport's safeguarded area and not the 13km bird hazard consultation zone that is applicable to SuDS schemes (which we describe in our comments relating to Section 7.9). Details of the 13km bird hazard consultation zone therefore need to be communicated in the SuDS SPD. --- We acknowledge receipt of the above consultation document and note the closing date for comment is fast approaching. However, it would be good to know why the majority of our previous representation wasn't reflected in this new draft and why the Aerodrome Safeguarding Authority isn't cited as a Statutory Consultee? Who are we best speaking with the try to ensure that our representation (which will effectively be repeated) sticks this time? Clearly, we don't want to be in a position of waving the Air Navigation Order around suggesting that certain policy documents and approaches are in contravention of	

	the following clauses, and as a reminder anyone found in contravention of the Order is liable to prosecution: Endangering safety of an aircraft 240. A person must not recklessly or negligently act in a manner likely to endanger an aircraft, or any person in an aircraft. Endangering safety of any person or property 241. A person must not recklessly or negligently cause or permit an aircraft to endanger any person or property.	
Barratt & David Wilson Homes North West	Please see attached document. Barratt & David Wilson Homes North West are a prominent housing developer within the Cheshire East Council area and therefore feel it appropriate to submit a consultation response to the final draft of the SuDS supplementary planning document that has been produced. It is noted that the document is significant in length and could be condensed whilst still communicating the main discussion points. We feel this document should be utilised as an addendum for developments within the CEC boundaries to the already widely accepted CIRIA C753 SuDs Manual and the Design and Construction Guidelines (DCG) for foul and surface water sewers, with the former taking precedence of the latter. Further detailed engagement with the incumbent water companies, as well as the newly emerging NAV companies is required before publishing to take into account the impacts the proposals have on adoption. CEC needs to provide details for the transitional arrangements to the new guidance once it is implemented for those developments already under construction, those that have received a decision notice and those going through the planning process. Consideration also needs to be given to those at early viability stage for land	The SuDS Guide has been prepared in consultation with United Utilities and a number of other stakeholders including the Environment Agency. Unfortunately, it has been impractical to consult with all emerging NAV companies. Viability assessment has been undertaken as part of the adoption of the CELPS and SADPD. No transitional arrangements are proposed. Each scheme will be assessed on its merits having regard to the impacts upon viability as set out in the CEC Residential Design Guide SPD. The following amendments have been incorporated:

	purchase as budgets for these sites will generally will have already been fixed based on previous drainage strategies. The following points we believe require further consideration: Section 4.6 – Discharge and Run-off Considerations Whilst greenfield run-off rates are the target, for brownfield developments heavy in impermeable surfaces SuDs systems should be designed to provide a considerable appropriate betterment but not held to greenfield run-off flows. The method used to calculate these brownfield rates needs to be detailed and further guidance provided. Section 5.4.7 – Site Control – Detention Basins There is no need for a separate bypass or drawdown facilities on detention basins. Section 7.7 – SuDS Submissions – General Requirements The use of underground storage beneath highways is still a viable solution as this reduces the amount of overall land required that could be used for public amenity, particularly in high density areas. Your example The Strand Liverpool in Appendix A shows clearly shows storage beneath the highway. The document states that Cheshire East Council are currently not adopting SuDS features, however we presume that storage and attenuation of highway drainage/public highway runoff is still acceptable as per the above. The use of swales as a SuDS measure adjacent to highways as well as attenuation basins should be deemed acceptable. Your photo at the top of page 48 (5.4.2) also in your foreword clearly shows this. Section 7.18 – Water Quality The table for Run-off Hazard Levels lists Residential in the Medium Risk category along with Commercial and Industrial. We feel this is too cautious as Residential is recognised as Low Risk in the SuDS Manual. As developers we feel that further drafting and consultation is required on this document to understand its relationship to the SuDS Manual and the DCG, what	Section 4.6 Discharge and Run-off Considerations – A new paragraph has been inserted under Brownfield Sites (para 129, p. 33) :- *"When calculating the brownfield runoff rate, surveying and modelling should be undertaken to confirm how the site currently drains. For example, if the brownfield site is currently drained by a 225mm pipe the brownfield runoff rates should take account of the limits this poses."* Section 5.4.7 – Site Control – Detention Basins – Technical requirements - Configuration and Dimensions of Detention Basins (p. 57) Bullet 4 amended to omit reference to bypass sewer piping and insert "…*and outlet with flow control device including drain down bypass."* 7.22 Adoption of SuDS, para 249 (p. 77) sets out that whilst Cheshire East Council presently will not adopt SuDS on private land it will usually adopt public highway drainage and would consider adopting SuDS as part of the publicly maintainable highway, but on a case by case basis.

	the timeline will be for implementation, and ultimately what impact this will have on our customers on current and future developments. Cheshire East SUDS Supplementary Planning Document - BDW North West.pdf	Swales adjacent to highways have not been precluded, subject to them being designed and maintained appropriately (i.e. in accord with the guidance in this SPD). Section 7.18 – Water Quality Run-off Hazard Levels (p. 75). The waymarker has been amended to remove residential from the medium category
Bloor Homes (NW) Ltd	Please find attached my consultation response to the latest (undated) Cheshire East Council Draft SuDS Guide. In this regard I am acting on behalf of Bloor Homes North West. - I had provided a consultation response to the 2021 draft yet I was not afforded the courtesy of being sent the latest draft only recently receiving this via another party. As a result, I have had a very limited time to review and comment upon the document. - In conjunction with the draft document I received a table of consultees comments, including my own, and the actions taken by CEC in response, many of which claim to have addressed matters raised. However my review of the latest draft identifies that this is not necessarily the case with no apparent action having been taken in response to my own comments despite CEC response advising alterations have been made. - Notwithstanding, given the intended status of this document I have undertaken a more thorough assessment of the key elements which is summarised attached but is by no means exhaustive.	The following amendments have been incorporated: 5.3.2 Source control – permeable surfacing p 40 – amended to refer to it being a Planning rather than Legal Requirement, including a waymarker to government guidance. Under Technical Requirements: Porous or Permeable Paving - Selection and Siting (p. 41), the third bullet referring to “within 10 feet of building foundation…” has been removed. The 6th bullet has been amended to 1 metre. 5.4.2 Site Control – Swales – Technical Requirements - Configuration and Dimensions of Swales (p. 49) – the reference to 1 in 4 side slopes has been

	The document is unnecessarily repetitive and is littered with anomalies, errors and contradictions and includes requirements which conflict with Ciria 753 and the requirements of United Utilities. It very much appears to be academically driven with no evidence of the high standard of experienced engineering input demanded by a document of this intended status. CEC's stance that no transitional arrangements will be put in place pays no regard to the time and effort which has to be invested by developers in establishing the viability of schemes prior to initiating the planning process. It is quite simply unreasonable by any standards to deny the development industry realistic transitional arrangements. Under the introductory section, Primary Purpose, Figure 1-1 claims that this guidance will variously 'provide a clear and consistent approach', 'enable developers to complete efficient site assessment', 'provide an organised structure' and 'allow efficient assessment of submitted SuDS proposals'. If Cheshire East Council are serious about delivering on these commitments, then the numerous issues raised in my own review and that of others should be fully assessed and responded to. If this is not done then implementation of the guidance in its current form will only serve to complicate an already tortuous approval process further compromising the deliverability of housing in the council area and thus achieve precisely the opposite of its stated purpose. Cheshire East must therefore allocate the appropriate time for establishing a robust deliverable document with input from the development and consultancy sector, the very parties who after all are responsible for delivering SuDS. ATTACHMENT: I am a Chartered Engineer with 40 years' experience and run my business, Lees Roxburgh Ltd, specialising in flood risk, drainage and roads design for the housebuilding sector.	amended to 1 in 3 to accord with the SuDS Manual 5.4.6 Site Control; - Canals, Rills and Channels (p 54), the Highway Authority have been involved in the preparation of the SuDS Guide. As noted, the image is from Susdrain, a recognised body in relation to sustainable drainage. Each scheme will be subject to safety audit. 5.4.7 Site control – Detention basins -Technical Requirements - Configuration and Dimensions of Detention Basins (p 57) - bullet 4 has been amended to delete "bypass sewer piping" and insert *"including drain down bypass"* Bullet 6 has been amended to 1 in 3 to accord with CIRIA. Bullet 7 has been amended to a maximum design water depth of basins shall be 2 metres. 5.4.8 (formerly 5.4.9) Site control – Underground storage features. Whilst noting the comment re: space constrained sites, a design incorporating multiple SuDS components is preferable to a

	I had previously responded to the 2021 draft document on 9th September 2021 and my response has been included in the CEC Appendix B: Report of Consultation June 2021. However it has been disappointing to note that most of the comments I made at the time have not been reflected in the updated draft document despite CEC's claim that alterations have been made for consistency with the SuDS Manual, and indeed this is a theme reflected in CEC's response to comments from other consultees. There therefore remain many issues, some fundamental, which simply have not been addressed. On this basis I have my concerns that any further consultation responses will be similarly ignored resulting in a document with numerous contradictions to other guidance, and which can only serve to cause confusion and delays in the submissions and approval process, the very aspect which the document claims to avoid. It is also disappointing to note that I only received this document via another party very recently and I was not afforded the courtesy of its being provided direct by CEC to me as a respondent to the original consultation. I have therefore been afforded a very short time to respond. Nonetheless I have reviewed this latest document to the extent time has permitted and provide comments below which include aspects previously raised by myself and other consultees which have not been addressed. I simply have not had sufficient time afforded to me to be able to undertake a comprehensive response and review but it appears to me that a fuller more detailed review will encounter other issues. Whilst all these issues need to be resolved I have highlighted in bold and red those which I consider most fundamental. 5.3.2 Source Control – Permeable Surfacing	single attenuation structure – the case study in Appendix A, Riverside Court in Stamford is a pertinent example of what is possible in constrained circumstances. Technical Requirements Underground Storage – Pre - treatment, inlets and outlets (p 60) – bullet 2 changed to: "*Where debris can enter the control (e.g., where the upstream system is open or where the inlets are gullies), static controls should have a minimum opening size of 100 mm, or equivalent; Where the design of the upstream system will prevent debris entering the system (e.g., underground systems where the inlets are pervious pavement systems), static controls should have a minimum opening size of 50 mm"* 5.4.9 (formerly 5.4.8) – Site control pre-treatment Oil and Sediment Separators (p 61) paragraph added *"Alternative SuDS components should be prioritised but,* ***as a last resort,*** *oil and sediment separators can be used for pre-treatment, or site treatment for the*

	It is simply untrue to state that it is now a legal requirement in England that new and refurbished driveways in front gardens must be designed to be permeable. Poynton Town Council in their consultation response made this very point with CEC's response stating that alterations have been made, yet they have not. It is perverse to state that permeable paving in the adoptable highway is not preferred. We cannot have a situation whereby CEC as a whole are not fully committed to delivering such solutions. In our experience of over 40 years of working in Cheshire we would not categorise ground conditions as likely to be favourable for infiltration. Many areas are underlain by clay, and where underlain by sandy conditions the quality of the sands (silty and clayey) preclude the delivery of infiltration based solutions to the required design standards. Typically we encounter ground conditions where infiltration rates might hover around the 10- 5m/sec value, a borderline rate for a robust infiltration based design. The requirement here to then impose a factor of safety of 10 would effectively rule out infiltration on many sites where currently deemed as feasible designed to the appropriate standards. The suggestions as to selection and siting are not clear implying as acceptable the location of permeable paving within 10 feet of building foundations or 100 feet from a building foundation which is below the proposed pavement location, whereas presumably the intention is that paving should be located outside the zones rather than within. It is not clear why the zones are identified in feet when the UK has been working to the metric system for decades. Either way, whilst Building Regulations require a minimum distance to be provided from soakaways to building foundations it is inevitable that paving will extend close	*removal of sediment, litter, and oil from surface water run-off where particular site* *issues demand it such as contaminated brownfield sites, large industrial sites or* *large-scale vehicle parking areas."* A further in bold note has been inserted: *"**Please note that United Utilities and the Design Manual for Roads and Bridges do not advocate use of oil and sediment separators within adoptable systems, and actively promote the use of green solutions.***" *5.5 Regional Control – Retention Pond* Regional Control is described at 2.5 The SuDS Management Train (p 16) Technical Requirements - Retention Ponds – Safety (p 64). Bullet 5 relating to safety grills for inlets and outlets is correct. 7.7 SuDS Submissions – General Requirements (p 71), para 180 amended to remove sentence re:

	to properties and therefore will inevitably sit above the building foundation and this should not be a problem. However the standoff requirements stated here will effectively preclude the introduction of permeable paving on all residential development sites. 5.4.2 Site Control – Swales It is simply incorrect to state that the land take for a swale is usually a minimum of 4m in width where swales are proposed to drain highways which need to be kerbed to meet adoptable requirements. In this case, drainage will need to be provided via a gully and pipe system which typically sets outfalls into an adjacent swale, with an appropriate clearance above bed level and with allowance for pipe gradients, at least about 1.5m deep. With maximum 1 in 4 side slopes and, say, a bed width of 1m this would result in an overall swale width of 13m. Indeed it is interesting to note here that the photograph included under this section identifies a swale width considerably in excess of the 4m identified and consistent with our advice above. On this basis there is no way of achieving requirement that the depth of the swale shall be between 400mm and 600mm unless a significant change in approach is accepted by the Highway Authority. Incidentally the maximum slope width permitted by C753 is 1 in 3 so one of the many contradictions between the two documents. In summary, unless the Highways Authority are prepared to relax their adoptable standards to allow highway drainage to spill direct into an adjacent swale system then the provision of swales will have a significant impact on developable areas. 5.4.6 Site Control – Canals, Rills and Channels A Susdrain image has been included showing a paved channel alongside an adoptable road. We would suggest that such a feature would present a significant health and safety risk to pedestrians and cyclists and would not pass a robust road	designer liability and professional indemnity. 7.10 Drawings, Calculations and manhole records (p 73), para 205 has been amended to delete reference to 1:20, 1:50 and 1:100 scale drawings 7.11 Hydraulic Design Para 211 (p.73) accords with the SSG and Sewers for Adoption runoff coefficient. Waymarker 4.3 has been amended to delete table. 7.16 – Previously Developed Land (p 74) para 226 bullet b, reference to 2A-2C has been omitted 7.18 Water Quality. Waymarker has been amended to reflect Ciria SuDS Manual (p 75) 7.19 Record information for the Completed Works (p 75) - para 231 has been amended to reference E7.3 of the Design and Construction Guidance for foul and surface water sewers… 7.20 Planning Submission Assessment, Para 232 (p 76) – the

	safety audit. Consultation with your highways section would no doubt confirm this advice. To what extent has your highways section been consulted on this document? Whilst reference is made to permeable surfacing being provided as an attenuation component, this section relates only to situations where ground conditions are suitable for infiltration and I would suggest that this is made clearer. 5.4.7 Site Control – Detention Basins Maximum side slopes of 1 in 4 are identified but this contradicts C753 which advises 1 in 3. Reference is made to a sedimentary forebay option although C753 cautions against such provision in key amenity areas as these features can be unsightly. What is the basis for the requirement for a surface water bypass and drawdown? I identified my concerns on this aspect in my consultation response but these simply went unanswered. What is United Utilities' view on such requirement? A maximum design water depth of 3m is advised which contradicts C753 which identifies 2m and very much pushes against United Utilities' aspirations to achieve closer to 1m. Either way, 3m is excessive especially when one is endeavouring to avoid a bomb crater like feature. Where has the minimum 24 hour drawdown time come from? As the required attenuation volume reduces for smaller sizes this may well force the imposition of a restricted discharge rate below that which can practically be achieved paying due regard to maintenance, and noting that 5.4.9 identifies a minimum orifice size of 75mm diameter (and other related design criteria) but strangely no similar inclusion in this section.	reference to developer/designer indemnification has been omitted. 7.21 North West SuDS Proforma Template (p77). The proforma is a regional template to assist developers, planners and LLFAs in the appropriate design and management of SuDS schemes and in applying for planning permission.

	Under Amenity the wording is unclear, surely the purpose of a detention basin is that it will flood for all events to varying degrees but more extensively for less frequent events? With regard to the requirement for a 3.5m minimum access road width United Utilities who are currently adopting basins accept 3m. It states that design should use appropriate wearing course materials whereas United Utilities will accept a grasscrete type construction which is surely far more sympathetic to the provision of the basin as an amenity as compared with the blacktop construction specified here? 5.4.8 Site Control: Pre-Treatment – Oil and Sediment Separators Please note that United Utilities will currently not adopt these features. 5.4.9 Site Control – Underground Storage Structures C753 uses the terminology Attenuation Storage Tanks. Why confuse matters by using a different description? This states that underground storage structures should only be used where above ground space is not available but then goes on to state that underground water storage structures are not permitted under public highways going on to add that these features can be designed to attenuate storm water where no surface space is available. There are situations particularly on smaller developments where there is simply insufficient space for either an above ground attenuation feature or a below ground one and the only practical solution which would not compromise the deliverability of the development proposals would be to provide the attenuation in pipe below the adopted highway an approach we have been adopting now for some 30 years and which has been routinely accepted by CEC Highways. This fundamental change in policy is likely to compromise the deliverability of many schemes for which the drainage strategies have been well advanced.	

	With the presumption being that the Highways Authority will not adopt permeable paving then there may well be situations where highway surface water runoff needs to be attenuated in pipe within the highway. In such situations, how can underground water storage structures not be permitted under the public highway? The technical requirement states that pipes less than 900mm internal diameter can be utilised for attenuation but the pipes larger than 900mm will not be permitted under public highways, i.e. less than or larger than, but what about pipes which are precisely 900mm in diameter? The document states that the maximum water level in any structure shall be at least 600mm below the lowest floor level of any adjacent premises. On sloping sites this is not always possible without artificially and unnecessarily raising floor levels. It should be quite acceptable to avoid this by demonstrating there is a suitable overland flow route for exceedance flows. The requirement for the provision of low flow channels within pipes is unrealistic and not an option. United Utilities accept a minimum 1 in 400 gradient for attenuated pipes and this allows attenuation to be most economically mobilised. The introduction of steeper gradients as proposed here means that the attenuation capability of underground tanks and pipes will not be fully mobilised creating unnecessary additional attenuation requirements and compromising the deliverability of the most sustainable solution paying due regard to material costs and excavation volumes. The document next states that underground storage should not be located beneath public areas and is not permitted under public highways although there is no reference to the embargo on public areas on the previous page, and as noted this contradicts the statement above that only pipes larger than 900mm will not be permitted under public highway.	

	This statement is also confusing in implying that pipes greater than 900mm cannot be utilised for attenuation irrespective of where they are located. Presumably this is not the intention as clearly attenuation design standards routinely require pipe diameters in excess of this value particularly as the volume of storage achievable on a per meter basis increases exponentially as the pipe diameter increases. A 1.8m diameter pipe provides four times the volume per metre of length than a 900mm diameter pipe. What is the rationale for precluding the provision of underground storage beneath public areas? This is a well established approach with areas of underground storage covered by the appropriate easements with United Utilities but remaining available for public access and available as an amenity without visual intrusion, other than manhole covers which is routinely the case where sewers pass through public open space areas. Reference here is made to Sewers for Adoption 7th Edition whereas consultee comments have alerted CEC to the fact that the relevant document is in fact the SSG. Again, this remains uncorrected. 5.5 Reginal Control – Retention Pond C753 titles these features as Ponds and Wetlands. Again why the difference in terminology? What is meant by regional control? It is noted that such features should be located outside the flood plain but no such reference is made with respect to 5.4.7 Detention Basins. Does this mean detention basins are permitted within the flood zone? There are a number of key characteristics here which we would expect should apply equally to detention basins but have not been so applied. A further example of this is reference to such features not being suited to sloping sites a consideration which would apply equally to detention basins but is not being referred to under Section 5.4.7.	

	Again reference is made to a 3.5m wide maintenance route as compared with United Utilities requirement for 3m. Why is the maximum depth of attenuation storage 2m here as compared with the 3m for a detention pond. Similarly the freeboard is specified as 600mm as compared with 300mm for the detention pond? I repeat my previous comments as to why a surface water bypass arrangement is required, not referred to in C753, and unnecessarily costly and land hungry. How does this relate to United Utilities' expectations? Reference is made to all outlets which are larger than 350mm being fitted with safety grilles. This is contradictory to United Utilities requirements who specify 450mm and above. 7 Planning Approval and Adoption Figure 7.1: Responsibilities. Where can the Council SuDS Checklist be located? 7.3: Masterplanning Item 168. This clearly states that the developer should plan the SuDS layout taking account of Ciria SuDS Manual C753 yet there is no reference to this CEC document so presumably C753 takes precedence where there is any contradiction (and there are many)? 7.7 SuDS Submissions – General Requirements Item 176. The designer has no contractual relationship with the LPA/LLFA and any undertaking with regard to professional indemnity is a matter between the designer and his client (the developer) and not appropriate for inclusion in this document. Item 178.	

	It is concluded from this statement that if connection is proposed to a combined sewer system United Utilities requirements should take precedence over any requirements in this document. Is this the case? Please also note that the reference to the term Water Authority has long since been outdated, the correct reference should be Sewerage Undertaker. Item 180. Refer to previous comments with regard to location of attenuation facilities within the adopted highway. Item 183. Reference here is made to the SuDS Pro-forma. Does this mean the North West SuDS Proforma? Item 184. Reference now made to the Water Company, should be the Sewerage Undertaker. 7.8 Development and Flood Risk The tone of this section implies a requirement for assessment of off site capacities and third party implications with regard to the discharge of surface water to the watercourse network. The NPPF is predicated on at minimum restricting flows to greenfield runoff rate and therefore mimicking existing arrangements. Therefore any deficiencies in the capacity of systems downstream is the responsibility of the relevant landowner under riparian law. It is fundamental under the NPPF that deliverability of development drainage systems is not ransomed by third party constraints downstream. This section implies otherwise and needs to be corrected. 7.10 Drawings, Calculations and Manhole Records It is not clear from this section as to the timing of the level of detailed information set out. It would be clearly inappropriate and unrealistic for a full detailed submission to accompany a detailed planning application. This would be prepared	

	once the layout has been approved in detail and submitted at discharge of conditions stage via a RMA. Item 204. It is simply incorrect to state scales in common use are 1:20 1:50 and 1:100, layout information is routinely provided at scales of 1:500 and 1:250. 7.11 Hydraulic Design Item 208. Reference is made to Sewers for Adoption September 2013. As noted this has been superseded. Item 210. Whilst this complies with the SSG United Utilities is currently expecting coefficients of 0.75 summer and 0.84 winter to be applied. This contradiction needs to be resolved with United Utilities. Item 211. It should be clarified that this additional increase of 10% should only be applied to private areas and not adoptable highways. Item 213. As noted above provided runoff rates are restricted to existing greenfield rates or lower then there should be no requirement for consultation with third parties, nor downstream hydraulic and structural assessment where connection is proposed to the watercourse network. I reiterate that any requirements to the contrary are simply incorrect and need to be corrected. Item 215.	

	Again reference is made to the now outdated Sewers for Adoption 7th edition (which applied to pumping stations only by the way). Way Marker 4.3. The table included here was superseded in May 2022 and is therefore incorrect, a 45% allowance for climate change over and above the 1 in 100 year event generally applies in the CEC area. 7.12 Attenuation Storage. Please confirm that the requirements of the adopting authority, in this case United Utilities, will prevail here. Item 222. Consent to the discharge rates and point of connection is achieved via the submission of the SuDS Pro-forma so clearly cannot be included in the submission. The physical permission to construct headwalls etc., at the point of discharge is obtained through the Land Drainage Consent process at detailed design stage. Again I note that third party land ownership should not be an issue provided proposed discharge rates mimic or better existing rates. 7.16 Previously Developed Land Item 225b. This refers to Section 2A-2C. Where are these sections? 7.18 Water Quality This section categorises residential as medium risk and as presenting equivalent risk to that from commercial and industrial uses. This makes no sense and contradicts Ciria 753 which categorises residential development separately as low to very low.	

	This aspect was raised as one of many issues in the previous consultation to which CEC have responded that the document has been amended to reflect this concern, but clearly has not. 7.19 Record Information for the completed Works Again United Utilities' requirements should take precedence, and note further reference to now superseded Sewers for Adoption 7th Edition. 7.20 Planning Submissions Assessment Item 232. See my previous comments regarding the absence of any contractual relationship between the designer and the LPA/LFA. Also, the developer does not normally carry professional indemnity insurance and the designer cannot accept liability for compliance by the developer or his contractor through professional indemnity insurance. In any event this would be a matter between the designer and developer as previously advised. 7.21 North West SuDS Pro-Forma Template Item 244. Requires that the applicant conforms with Cheshire East Council SuDS Guidance documentation, local planning policies and all relevant national legislation policies and guidance which presumably are referred to in Appendix C. So, in addition to developers and consultants being faced with addressing the requirements set out in Ciria 753 (968 Pages), the SSG (214 Pages), the North West SuDS Proforma and Guidance (12 Pages) and now this document (99 Pages) they also need to consider a further some 60 No. documents, an impossible task even without the anomalies, errors, contradictions and differing requirements identified in this response between the first four of these documents.	
Sandbach Town Council	We wish to express our support for the Sustainable Drainage Consultation process. The key points and recommendations presented in the report highlight the importance of sustainable water management in new developments, and we	No change required

	believe this document is a significant step in the right direction for Cheshire East Council. The emphasis on Sustainable Urban Drainage Systems (SuDS) is particularly noteworthy. SuDS offer a range of solutions for managing surface water that can contribute to a greener, more sustainable urban landscape. By providing guidance on SuDS , you are not only promoting environmentally friendly practices but also enhancing the overall quality of life for residents through improved design and reduced flooding risks. Furthermore, the report's consideration of equalities, public health, and climate change is both responsible and forward-looking. It demonstrates a comprehensive approach to planning that takes into account the well-being and future resilience of the community. The objectives outlined in the report align with crucial aspects of urban planning and environmental sustainability. In taking proactive steps to ensure that new development in the borough is well-controlled and designed to protect and support the environment. This commitment to sustainability is commendable and reflects a forward-thinking approach to urban development. There are however likely significant obstacles to adoption of the design processes highlighted for capture and storage. Resistance from building developers and architects to a step change in taking more responsibility in their developments for surface water management. Education and normalisation of the choices available to developers and architects needs to come from everywhere. The more biodiversity supporting choices especially need to be championed in some way. Green roofs offer the most biodiverse option along with optimization of space in a close urban environment. Green roofs are rare in Cheshire East, and we are not aware that any new flagship council or government structures in Cheshire East are planned to contain this feature. Exposure to the feature will normalise its existence	

	and promote its adoption more widely or at least reduce resistance to its incorporation in designs. Where site space is available then pond style storage will be a welcome choice as is often seen now. This should be encouraged but may detract from the optimal use of a site for its purpose especially in urban areas and lead to developers looking to larger sites in green space areas to include space for appropriate pond style storage. Rather than filling gaps in the current urban landscape utilising green roofs and smaller pond storage methods. This then leads to alternative choices of underground storage where the high cost of maintenance and building regulation compliance for subterranean man-made storage in regards to such elements as legionnaires disease, will possibly lead to opposition and resistance to its adoption and the potentially burdensome cost for developers. Again this could lead to developers looking to larger sites in green space areas as better development choices to incorporate a building plus pond style drainage management. In conclusion, the Sustainable Urban Drainage Systems Document represents a positive and proactive effort to manage surface water in Cheshire East which Sandbach Town Council fully supports. We appreciate your ongoing work in protecting the environment, supporting responsible development, and considering the well-being of your residents. Thank you for your commitment to these important matters.	
Peter Collinson	As a former Hydrological Engineer now long retired I was impressed at the document which I have downloaded and inspected but not fully read yet. It is a long time since the days of 1979 after which initiative and enterprise became watch words for the events since. All power to those elbows now involved in the SUDS project. It is an out of the ordinary piece of national progress which deserves success.	No change required

The Coal Authority	The Coal Authority records indicate that within the Cheshire East area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety. Although we have no specific comments to make on the content of the SUDs SPD we would like to take this opportunity to draw attention to SUDs in areas where coal mining features are present at surface and shallow depth. Where SUDs are proposed as part of development schemes consideration should be given to the implications of this in relation to the stability and public safety risks posed by coal mining legacy. The developer should seek their own advice from a technically competent person to ensure that a proper assessment has been made of the potential interaction between hydrology, the proposed drainage system and ground stability, including the implications this may have for any mine workings which may be present beneath the site.	No change required
Cheshire Brine Subsidence Compensation Board	Good Afternoon, Thank you for the consultation on the Final Draft Sustainable Drainage Systems SPD, we have reviewed the documents and have the following comments: Under the provisions of the Cheshire Brine Pumping (Compensation for Subsidence) Act, 1952, the Board is a statutory consultee for applications for planning permission and building control approval within certain areas within Cheshire identified as “Consultation Areas”. The Board assesses applications within the Consultation Areas and makes outline recommendations for foundation requirements. It should be recognised that brine related risks with Cheshire are not solely confined to the Consultation Areas, and areas relating to “natural dissolution” of rock salt could occur elsewhere. Where the Board’s recommendations have not been incorporated into the foundation design this could seriously affects any rights of redress in the future.	The following changes have been incorporated: In section 4.7 Selecting SuDS Components (p 34) – reference to land Instability due to halite soils and the appropriateness of particular SuDS components is now included in paras 135/6 and in the SuDS Suitability Selection Matrix on p 35. In Section 3.2 Integrate with Geological Drainage (p 19), Halite has been inserted into para 44. In Section 4.6 – Discharge and Run-off Considerations (p 32), new

	Within a number of consultations the Board regularly sees the incorporation of soakaway / infiltration drainage within the design – the Board does not usually accept the use of soakaway drainage as the introduction of freshwater into the underlying Halite deposits can promote dissolution which in turn has the potential for ground stability to occur at the ground surface. The Consultation Areas are generally situated within higher risk areas, that is where deposits of rock salt subcrop at rockhead presenting as a solution surface, and these areas are known as areas of "wet rockhead". We have reviewed the document and there does not appear to be any reference to the presence of the underlying rocksalt deposits, however we note that within Section 4.6 (Discharge & Run-off Considerations) the following has been included: "Consultation with the relevant bodies depending on the location to which surface water is to be discharged: 1. To the ground – consultation (where relevant) with the Environment Agency, National Coal Authority, British Geological Survey, Cheshire Brine Subsidence Compensation Board". In the Board's opinion we would recommend that the following text should be incorporated into the document: Land Instability (Salt Subsidence) Consideration of the underlying geological setting should be taken into account when determining SUDs, particularly where it is intended to incorporate the use of infiltration / soakaway drainage; however, ideally it is expected that this would be suitably addressed within a Phase 1 Desk Study Report for any new proposed development. Deposits of rock salt (halite) where they subcrop beneath the Superficial Deposits present themselves as a solution surface as a result of the dissolution of rock salt where it comes into contact with mobile groundwater and these areas are known as areas of "wet rockhead". The incorporation of infiltration / soakaway drainage within these areas is therefore not accepted as the introduction of freshwater into areas of underlying halite has the potential to cause further dissolution of the halite beds. In turn, this has the potential for ground instability to occur at the ground surface as a result.	sentence inserted at the end of para 123: "*The Cheshire Brine Subsidence Compensation Board should be consulted for any new development proposing the incorporation of SuDS infiltration/soakaway drainage within their consultation areas and in particular areas recorded to be underlain by Halite (rocksalt) deposits ("wet rockhead"), in order to prevent any potential dissolution of the underlying rock salt and ground stability issues."* At 4.7 Selecting SuDS Components (p 34) Halite soils inserted into para 135 and further bullet added to para 137 "*Land Instability (Salt Subsidence)"* Column added to SuDS Suitability Selection Matrix entitled *"Land instability (Salt subsidence)"* - coloured orange for infiltration identification - rows 12-14) (p 35). Asterix note added to SuDS Suitability Selection Matrix – Infiltration (rows 12-14), with the following text below *"The use of infiltration drainage is subject to*

	The Cheshire Brine Subsidence Compensation Board (CBSCB) is a statutory consultee for planning and building control applications within prescribed, consultation areas (areas where there is an increased risk of brine related subsidence damage), however where there is a requirement to incorporate infiltration / soakaway drainage into areas of "wet rockhead", further assessments should be undertaken in order to determine the suitability of such drainage and as a minimum the CBSCB would be expected to be consulted on such matters prior to any construction works commencing. The inclusion of infiltration / soakaway drainage within any new, proposed development where not previously approved by the CBSCB may seriously affect the rights of redress in the future." By review of the document in its current format it is recommended that the above text is inserted as a new paragraph, under existing paragraph 129, under "Land Instability" (page 33). When reviewing the document the Board also considers that further inclusions referencing to the presence of rock salt is included, as follows: Section 3.2 – Integrate with Geological Drainage This section describes the geology of the Cheshire Basin and whilst there is mention to the presence of the Mercia Mudstone Group there is no reference to the deposits of halite / rock salt (Wilkesley Halite & Northwich Halite Formations). In the Board's opinion further information regarding the presence of the Halite beds should be included within this section. Section 4.6 – Discharge and Run-off Considerations It is noted that the preferred option for surface water discharge is via infiltration / discharge to the ground and the document does state that there would be a requirement to consult with the Board if it is proposed to discharge surface water to the ground. It is recommended that a paragraph is included after "paragraph 121" along the lines of the following:	*approval with the Cheshire Brine Subsidence Compensation District."* (p. 35) Fig 7-4 (p 72) amended to include Cheshire Brine Subsidence Compensation Board as a Statutory Consultee.

	"The Cheshire Brine Subsidence Compensation Board should be consulted for any new development proposing the incorporation of SUDs infiltration / soakaway drainage within their Consultation Areas and in particular areas recorded to be underlain by Halite (rocksalt) deposits ("wet rockhead"), in order to prevent any potential dissolution of the underlying rock salt and ground stability issues." Paragraph 129 (Land Instability) Under "Land Instability" there is no reference to the presence of rock salt and it is recommended that the bold text at the beginning of this email is incorporated into this section, preferably as a new paragraph. Paragraph 132 As above reference to the presence of Halite should be incorporated into this paragraph. Paragraph 133 Within this paragraph it is recommended that an additional bullet point is included - "Land Instability (Salt Subsidence)". Within the SuDS Suitability Selection Matrix on page 35 the incorporation of the additional bullet point should be included under land use suitability, with a particular focus on "Infiltration", - it is recommended that a note is included within the Table stating that "the use of infiltration drainage is subject to approval with the Cheshire Brine Subsidence Compensation District". Section 7.9 – Consultation Under figure 7.4 the Cheshire Brine Subsidence Compensation Board is not listed under Statutory Consultees which conflicts with information provided in Section 4.6. This should be updated to include the CBSCB under "Statutory Consultees".	
Natural England	Dear Sir or Madam, Final Draft Sustainable Drainage Systems Supplementary Planning Document (SPD)	The following amendments have been undertaken. Ecology technical requirement added to Technical Requirements pages for Detention Basins (p 57)

	Thank you for your consultation request on the above dated and received by Natural England on 4th September 2023. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. We have had the opportunity to review the document and have the following comments to make: CIRIA SuDS Manual Natural England support reference to the widely recognised good practice document CIRIA Suds Manual throughout the document. Multi-functional benefits We are pleased to see reference to the potential biodiversity and amenity benefits of SuDS design throughout the document however, SuDS benefits to biodiversity should be seen as a "bonus" to the primary function that it serves (i.e. water quality or managing run-off rates). SuDS constructed wetlands are not a replacement for ecological mitigation and should run alongside the identified mitigation areas. For example, if there is a requirement for a development to create a Great Crested Newts (GCN) mitigation pond, it will need to be created in line with the Natural England licence and maintained and should not be double counted or used for another purpose. Site considerations Natural England consider that the document could be strengthened in relation to site considerations and potential impacts to nationally and internationally designated sites. When creating a SuDS scheme which will discharge into a statutory protected site it will need to have a supporting assessment to ensure that it will not harm the site. Seasonal and long-term impacts need to be understood, together with measures to identify problems early (should they occur). Variable water quality will occur on sites draining developments and depending on the	and Retention Ponds (p 64) stating: *"SuDS wetlands are not a replacement for required ecological mitigation for developments. For example, if there is a requirement for a development to create a Great Crested Newts (GCN) mitigation pond, a separate mitigation pond will need to be created and maintained in line with the Natural England licence and should not be used as a SuDS component."* *Section 4.7 Selecting SuDS components (p 34) has been amended by adding to and amending former Paras 131 and 132 (now paras 134/5) to:* *"134 Due to variable run-off quality from developments and potential pathways for contaminants and pollutants, if a SuDS scheme will discharge into a statutory protected ecological site, a supporting assessment will be required to ensure that it will not harm the protected site. Seasonal and long-term impacts need to be identified, together with measures to manage any problems early, should they occur. A SuDS train*

	SuDS scheme employed there could be pathways for contaminants and pollutants to the sensitive receiving environment. A “treatment train” with multiple SuDS stages (e.g. hydrocarbon interceptor, attenuation pool/tank, reedbeds, etc…) either in series or parallel to manage the surface water discharge to an acceptable level may be required. If schemes are either partially or fully discharging to ground, they need to ensure that it will not adversely affect groundwater. Some of the statutory protected sites in the County are groundwater dependent ecosystems and potential impacts to the site and groundwater body will require assessment, this is especially important when the discharges are carrying additional nutrients. It would also be useful to identify the Nutrient Neutrality catchments where developments can only be approved subject to no net gain in nutrients entering the designated site. Habitats Regulations Assessment Natural England are satisfied with the conclusion of the HRA/SEA Screening report.	*with multiple components may be required (e.g. hydrocarbon interceptor, attenuation pool, or reedbeds) to manage discharge to acceptable quantity and quality.* *135 Ground risk is also a significant factor for some components. For example, some sub-terranean or surface-permeable SuDS components may not be suitable in chalk or halite soils near highways and properties. Depending upon the site’s character and features, minimum offsets from built structures may be required for some SuDS components. Some statutory protected ecological sites in the borough are groundwater-dependent ecosystems and potential impacts to the site and its groundwater will require ecological assessment, with particular regard to additional nutrients. In Nutrient Neutrality catchments, development sites cannot discharge a net gain in nutrients into a designated site. A ground modelling exercise may be required to ascertain SuDS components’ suitability.”*

Highways England	Thank you for consulting National Highways regarding the Cheshire East Sustainable Drainage Systems SPD ('the SPD'). We have reviewed the document and note that its aim is to deal with new developments, run-off from which is not permitted to drain into the highway drainage system of the Strategic Road Network (SRN) as per CG 501 – Design of Highway Drainage Systems of the Design Manual for Roads and Bridges, and DfT Circular 01/2022 which states at paragraph 59: To ensure the integrity of the highway drainage systems, no new connections into those systems from third party development and proposed drainage schemes will be accepted. Where there is already an existing informal or formal connection into the highway drainage system from a proposed development site, the right for a connection may be allowed to continue provided that the flow, rate and quality of the discharge into the highway drainage system remains unaltered or results in a betterment. The company may require a drainage management and maintenance agreement to be entered into to secure this requirement in perpetuity. As the drainage policies within the SPD will therefore not impact the SRN, we will not look to comment further on the proposed policies. If you would like to discuss anything further, please let me know at this address. Could I also request that any further consultation requests are sent to PlanningNW@nationalhighways.co.uk rather than individual members of staff. This assists in ensuring they get to the right place in good time.	No change required except DMRB references within the SPD have been updated to CG 501 of DMRB
Historic England	Dear Planning Policy team, Cheshire East Final Draft Sustainable Drainage Systems SPD Thank you for consulting Historic England on the consultation on the Cheshire East Final Draft Sustainable Drainage Systems Supplementary Planning Document. Historic England has no further representations to make on the SPD.	No change required

	If you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.	
Homes England	Dear Sir / Madam Consultation on the Final Draft Sustainable Urban Drainage System Supplementary Planning Document Homes England Response As a prescribed body, we would firstly like to thank you for the opportunity to comment on the above consultation. Homes England is the government's housing and regeneration agency. We will drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home. Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.	No change required
Noel Massey	Fully support the objectives of suds and look forward to seeing implementation in any new development as well as retrospective improvements to the existing environment.At the moment there are good examples, such as the area around dams brook at the rear of the development on the old territorial army building, also bad examples such as channeling the river bollin beside the new retail development off the silk road at the rear of the large tesco store. the major points will be enforcement by planning and agreement of responsibility for ongoing maintenance. I assume that other active organisations such as cheshire wildlife trust and canal and rivers trust will be consulted and involved in planning and implementation. Retention and improvement of peat lands will play a major role in suds and should be protected as part of this initiative. Partnership with the agricultural sector will be vital both on the plain area and on the pennine slopes where much of the land is overgrazed causing excessive run-	Comments noted. No changes required

	off and where the headwaters of the relevant watercourses are located. Again the wildlife trust are active in building leaky dams, tree and vegetation management to slow run-off and retain water close to source.	
Defence Medical Services Whittington	Dear Planning Policy Team I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to Cheshire East Council's Final Draft Sustainable Drainage Systems SPD consultation. The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other parts of the MOD. Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' To this end, MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction. The Cheshire East Council authority area is washed over by safeguarding zones associated with RAF Tern Hill, specifically a birdstrike safeguarding zone and BAE Radway Green with an Explosive safeguarding zone. The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans and the constraints that might be applied to development as	Comments noted. In conjunction with amendments to address representation from Manchester Airport the following has been inserted (paragraph 33 p 14): *"Similarly, in the south of the borough the civil parishes of Dodcutt cum Wilkesley, Audlem, Buerton and Newhall have areas within a Birdstrike Safeguarding Zone surrounding RAF Tern Hill, some 8.4km south of the boundary of Cheshire East Council. Within this area, applications including SuDS will require consultation with the MOD. They should be consulted as early as possible in the design of SuDS, which should be designed in a way that does not attract large and flocking bird species."* The following has been added to Figure 7-4 p 72:- *"MINISTRY OF DEFENCE – consult for all applications within*

	a result of the requirement to ensure defence capability and operations are not adversely affected. Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above. To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of each of the safeguarding zone types is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply. • Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes. Aircraft within these zones are most likely to be approaching or departing aerodromes and therefore being at critical stages of flight. Within the statutory consultation areas associated with aerodromes are zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include the creation of new waterbodies such as detention basins, retention ponds, wetlands, bioretention capacity and landscaping schemes associated with large developments, such as green and/or brown roofs/roof gardens on flat roof buildings. Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation and therefore may be subject to design requirements or for management plans to be applied. • Explosive Safeguarding Zones serve to define areas in the vicinity of storage sites and armed aircraft stands in which land use and building types are regulated to maintain explosives storage licensing standards. In summary, the MOD should be consulted on any potential development within the Aerodrome Height and Birdstrike safeguarding zones surrounding RAF Tern Hill,	*12.87km safeguarding zone for RAF Tern Hill"* Policy GEN 5 Aerodrome Safeguarding of the SADPD has been included in Appendix B

	on any development which includes schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	
Anonymous	Dear Sir/ Madam, My response to the draft SuDS proposed plan: 1. I do not agree to my name being displayed or my contact details being divulged to anyone other than yourselves for the sole purpose of receiving these comments 2. Why is the Council wasting council funds with this elaborate plan? Who carried out the work, if not Council employees? 3. What are Hard Engineering options and why are they not acceptable? 4. What is the cost of implementing this policy to we the council tax payers; either directly or indirectly? 5. Why is the Council, like all other, obsessed with CO2? It's not a pollutant, it is plant food and they produce O2 for us to breathe? 6. Why not stop building more houses etc, if that is the main reason for this policy? 7. This all sounds like the UN Agenda 21 and Agenda 2030 to me. So, who is in charge of our country and our county; the UN or we the people of this country? 8. The jargon in this documentation is tiresome, is it deliberately so? 9. How much did this plan cost in total, and who paid for it?	No change required
Peter Ashworth	Unable to find out what you are planning. Does the "Final Draft" mentioned in every paragraph signify that at long last Cheshire East Council is going to keep the drains clear of fallen leaves from trees and hedges that are not maintained? Surely the	No change required

	time has come for the 100 feet high trees to be pruned down to an acceptable and manageable height? Leave the trees on the banks of the pool and prune them instead of removing them. Instead pull the fallen trees and previously cut down sections of trunks that have been left lying around and take them away. That will restore the views of the pool and stop contaminating the water. So to get back to the original message, yes keep the drains clear and maintained.	
Network Rail	Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order). Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered. Final Draft Sustainable Drainage Systems SPD Network Rail has the following comments on the above consultation. We ask that all surface and foul water drainage from development areas are directed away from Network Rail's retained land and structures into suitable drainage systems, the details of which are to be approved by Network Rail before construction starts on site. Water must not be caused to pond on or near railway land either during or after any construction-related activity and as a permanent arrangement. The construction of soakaways for storm or surface water drainage should not take place within 30m of the Network Rail boundary. Any new drains are to be	Fig 7.4 p. 72 updated to include Network Rail within statutory consultees. "*Network Rail within 10 metres of relevant railway land"*

	constructed and maintained so as not to have any adverse effect upon the stability of any Network Rail equipment, structure, cutting or embankment. The construction of soakaways within any Network Rail lease area is not permitted. The construction of surface water retention ponds/tanks, SuDS or flow control systems should not take place within 30m of the Network Rail boundary where these systems are proposed to be below existing track level. Full overland flow conditions should be submitted to Network Rail for approval prior to any works on site commencing. If a Network Rail-owned underline structure (such as a culvert, pipe or drain) is intended to act as a means of conveying surface water within or away from the development, then all parties must work together to ensure that the structure is fit for purpose and able to take the proposed flows without risk to the safety of the railway or the surrounding land. Usage of any Network Rail culverts are to be agreed with Network Rail. It must not be assumed that Network Rail will grant any access to its drainage to outside parties. Wayleaves and or easements for underline drainage assets The position of any underline drainage asset shall not be within 5m of drainage assets, sensitive operational equipment such as switches and crossings, track joints, welds, overhead line stanchions and line side equipment, and not within 15m of bridges, culverts, retaining walls and other structures supporting railway live loading. Protection of existing railway drainage assets within a clearance area There are likely to be existing railway drainage assets in the vicinity of proposed works. Please proceed with caution. No connection of drainage shall be made to these assets without Network Rail's prior consent to detailed proposals. Any works within 5m of the assets will require prior consent. There must be no interfering with existing drainage assets/systems without Network Rail's written permission. The developer is asked to ascertain with Network Rail the existence of any existing railway drainage assets or systems in the vicinity of the development area before	

	work starts on site. Please contact Network Rail Asset Protection for further information and assistance. Before the submission of a planning application outside parties are to submit details to Network Rail (AssetProtectionLNWNorth@networkrail.co.uk) – it is advised that agreement to development drainage to agreed prior to submission of plans to determine any impacts of the proposal and to ensure that the developer includes and funds any mitigation measures as required by Network Rail. The applicant is liable for all costs incurred by Network Rail in facilitating the proposal.	