

[REDACTED]

From: [REDACTED]
Sent: 17 July 2023 09:13
To: Charging
Cc: [REDACTED]
Subject: OFWAT Consultation on Environmental Incentives

Follow Up Flag: Follow up
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Dear [REDACTED] and [REDACTED],

Thank you for sharing this consultation document with us. Please note that we don't routinely respond to these, and we have found it easier to respond via the commentary below rather than via the individual questions. We are not in a position to comment on funding models or on the questions that specifically relate to Wales. We hope our comments are nonetheless useful to you.

- Overall we can see definite benefits in developing standard threshold/targets for SuDS, and for having a universally-understood bronze-silver-gold accreditation model.
- However, we're concerned that the treatment of SuDS in this document is quite superficial. The targets would need to be defined far more precisely than they are here for this to be operational. Consistent with the SuDS Manual, we would recommend an explicit requirement for SuDS that are designed to serve 100% of the property's impermeable area (including driveways) and for SuDS that deliver both retention (volumetric losses) of rainfall and attenuation (delay) of runoff.
- Personally I would recommend a target based on dealing with the 1 in 1 year event within the property curtilage, with the expectation that higher return period events are dealt with using site-based controls, such as a detention basin or pond.
- The text on page 9 implies that a green roof may provide a complete SuDS solution on its own ["Soakaways, green roofs and permeable driveways, which allow surface run-off to drain into the ground slowly and reduce the volume and flow of water entering the public sewer"]. Whilst it's reasonable to assume that a green roof will intercept the first 5 mm of a rainfall event, that is only a small proportion of a large storm event (e.g. 30-60 mm events). Without further SuDS interventions, the majority of the storm runoff will end up in the sewer. The text on page 9 suggests that a green roof permits infiltration, which is incorrect. A green roof could be used in combination with a slow-drain water butt and/or planter/bioretention/pond/soakaway.
- We welcome the case study examples. However, it would be good to have these peer-reviewed in some way, and perhaps include some reflections on transferability (or not!) of findings. We saw a presentation on the Isle of Wight study at a conference last week, and had a lot of questions ... Also the same option may not be appropriate everywhere; see the next bullet.
- Both RWH and SuDS may not always be beneficial; this is catchment-specific to some extent. Three examples: i) if the SuDS provide flow attenuation/detention only (no retention [volumetric reduction]), then there are some catchment scenarios where this will simply result in peak flows (and CSO spills) at later times at different locations within the sewer network; ii) reduction in 'clean' water contributions to wastewater collection networks may increase the risks of blockage, especially on shallow gradients; iii) RWH may remove water from the water cycle that would naturally be recharging groundwater or sustaining river baseflow.
- Is there scope to acknowledge the need to incentivise demand reduction in certain (water-scarce) areas and to incentivise SuDS more in other (flood risk) areas. Perhaps have a Bronze SuDS and a Bronze water efficiency rating that could permit one without the other, but then use silver and gold to reward the more complete integration? On reflection I think this is what Table 2 is suggesting!
- I'm not sure whether you've shared this with Bridget Woods-Ballard at HR Wallingford, but I think her comments - as first author of the SuDS Manual - would be invaluable.
- I note on P15, line 4, 'they're' should be 'their'

Kind regards,

[REDACTED] and [REDACTED]

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