

3<sup>rd</sup> September 2012

Rt Hon Caroline Spelman MP  
Secretary of State  
DEFRA  
Nobel House  
17 Smith Square  
London  
SW1P 3JR

*By Email*

Dear Ms Spelman

We are writing regarding the posting on your website dated 25<sup>th</sup> June 2012 which refers to the delay in implementation of Schedule 3 of the Flood and Water Management Act 2010.

On Saturday 25<sup>th</sup> August the city of Cambridge experienced a severe and abrupt storm event, widely reported to have consisted of 30mm of rainfall over a 12 hour period, much of which occurred during two short heavy downpours. This caused widespread flooding throughout the city for which the fire service was required to attend almost 40 separate incidents. This included flooding of strategic infrastructure including the city-wide CCTV control room and the City Council's emergency telephone service, from which it has had to be temporarily relocated. Many shops were also forced to close during peak trading hours leading to a loss in revenue, and some residential properties were flooded. Although an investigation into the causes of the flooding is yet to be concluded, it is widely predicted that this is partially, if not entirely, related to inadequacies in the capacity of the drainage and sewerage systems.

In light of the above and the flood events that have occurred throughout the UK in 2012, it is extremely disappointing to read that there is a further postponement in the implementation of Schedule 3 of the Flood and Water Management Act 2010. As engineering consultants working in the field of civil engineering we work tirelessly to advocate the use of sustainable drainage systems (SuDS) and highlight the benefits that these can bring, particularly in relation to reducing flood risk from storm events such as those occurring recently in Cambridge. However, there are still many developments we see that do not utilise this philosophy and therefore continue to put undue pressure on an outdated and overstretched pipework infrastructure.

In Sir Michael Pitt's 2008 report titled 'Learning Lessons from the 2007 Floods' the use of SuDS was recommended several times as a key measure in reducing the risk of surface water flooding. It was stressed that its use should be enforced through legislation. However, over four years later we are still awaiting implementation of this key piece of regulation.

We understand that some aspects of the legislation can be perceived as contentious and that you have received many responses to the initial consultation; however, we believe that strong leadership is required alongside appropriate resourcing to bring in the enactment of Schedule 3 as a matter of priority.

We look forward to hearing of an update and revised programme relating to the aforementioned in the near future.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. Arnold', written in a cursive style.

Dr Stuart Arnold

For and on behalf of Smith and Wallwork