

THE DRAFT LONDON PLAN

Examination in Public (EiP)

MATTER 73 – SUSTAINABLE DRAINAGE

CIBSE Response

Submitted 28th February 2019

Introduction

The respondent is **The Chartered Institution of Building Services Engineers (CIBSE)**.

The Chartered Institution of Building Services Engineers is the professional body that exists to:

‘support the Science, Art and Practice of building services engineering, by providing our members and the public with first class information’

CIBSE members are the engineers who design, install, operate, maintain and refurbish the energy using systems installed in buildings, including homes, and are specifically trained in the assessment of heat loss from building fabric and the design of energy using systems for the provision of heating and hot water, lighting, ventilation and cooling and small power distribution in homes. Many CIBSE members work in the public sector in general and in higher education in particular.

CIBSE has over 20,000 members, of whom around 75% operate in the UK and many of the remainder in the Gulf, Hong Kong and Australasia. Many are actively involved in the energy management of commercial buildings for larger businesses, and so this consultation is highly relevant to us and to our members.

CIBSE is the sixth largest professional engineering Institution, and along with the Institution of Structural Engineers is the largest dedicated to engineering in the built environment. Our members design, install, manufacture, maintain, manage, operate and replace all the energy using systems in buildings as well as public health systems.

As an Institution CIBSE publishes Guidance and Codes which provide best practice advice and are internationally recognised as authoritative. The CIBSE Knowledge Portal, makes our Guidance available online to all CIBSE members and is the leading systematic engineering resource for the building services sector. Over the last twenty-one months it has been accessed over 200,000 times, and is used regularly by our members to access the latest guidance material for the profession. Currently we have users in over 170 countries, demonstrating the world leading position of UK engineering expertise in this field.

www.cibse.org

EiP Questions

Would Policy SI13 provide a justified and effective approach to sustainable drainage in London? In particular:

a) Would it provide a justified and effective strategic framework for the preparation of local plans?

b) Would it provide appropriate, justified and effective guidance on development management matters? In particular, what is the justification for the drainage hierarchy as set out in Policy SI13B? Would it be appropriate, justified and would it be effective?

c) What is the justification for developments to achieve 'green field run off rates'? Is this based on robust evidence? Would this be an effective approach to sustainable drainage in London?

The need for run-off management and sustainable drainage systems, now and in the future accounting for climate change, is well evidenced; addressing it is consistent with the national regulatory and policy framework. Not that it should be needed given this existing background, but to stress the point we would refer to the recent report by the Committee on Climate Change¹, which highlights the need for flood management in a number of its recommendations on flood risk and the incorporation of green areas and sustainable drainage systems.

We support the overall objectives and welcome the following amendments compared to the previous draft, which are in line with what we had recommended:

- (A) that there should be attention to surface water run-off in all areas, not only in those where it is already an issue. Small improvements (or degradations), cumulatively, can lead to substantial impacts.
- (B) that green features should be preferred over grey, as we had recommended in recognition of their multiple benefits

As stated in our response to the consultation, we would recommend the introduction of clearer and more specific criteria linked to this policy, both at the London-wide level and for individual developments. This would make policy more effective and easier to monitor.

END

Response collated and submitted by:

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Please do not hesitate to contact us for more information on these responses.

¹ CCC, UK housing: fit for the future ? February 2019