



Department for
Communities and
Local Government

Sustainable Drainage Systems

Peter Ellis
Deputy Head of Division
Planning - Infrastructure and Environment
Department for Communities and Local Government



SuDS in twenty minutes...

- why pay attention to SuDS?
- the SuDS story so far
- national planning policy and guidance
- what it means for you





Why pay attention to SuDS?

Risks of traditional drainage:

flooding

- too much runoff into watercourses too quickly

environmental

- runoff is polluted





What are SuDS?

- Designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible
- Features such as ponds, grass and permeable paving to absorb the rain
- Tanks and pipes to slow the flow to the sewer



Why are SuDS important?

SuDS provide opportunities to:

- ✓ reduce causes and impacts of flooding
- ✓ remove pollutants from urban run-off at source
- ✓ combine water management with green space
- benefits for amenity, recreation and wildlife



The story so far...

- PPG25 (2001) and PPS25 (2006) encouraged SuDS
- Building Regulations require adequate drainage using most sustainable techniques practicable
- Pitt Review 2007/8 backed SuDS as an effective way to reduce risk of 'flash-flooding'
- Flood & Water Management Act 2010
- Government consultation 2011/12 on implementing Schedule 3





The story so far...

planning permission

+

SuDS consent

=

overlap and confusion?





The story so far...

HBF statement in response to BBC reporting on SuDS drainage systems.



“Any suggestion that house builders concerns over costs are delaying drainage system installation is a total misrepresentation and strongly refuted by HBF.

“House builders have been installing SuDS for almost a decade and providing the drainage systems to mitigate flood risk as required by Government and specified by Local Authorities and the environment agencies. Whilst above ground solutions could be more costly than below ground ones, house builders install the systems specified and agreed by Local Authorities.

January 2014



- Autumn 2014 - consulted on proposals to use planning system to deliver SuDS
- written ministerial statement 18 December 2014
- planning guidance and Defra non-statutory technical standards – March 2015
- lead local flood authority statutory consultee on major development with surface water drainage – April 2015

The story so far...





Planning policy for SuDS...

- National Planning Policy Framework expects local councils when determining planning applications to ensure new development does not increase flood risk elsewhere, and in areas at risk of flooding development would only be appropriate if it gives priority to SuDS
 - applicable irrespective of development size or type
- December 2014 WMS expects SuDS to be provided in all major new development (eg 10 dwellings or more)
 - applicable irrespective of location, wherever SuDs would be appropriate
- Both read alongside full suite of national planning policy including guidance on viability



Planning guidance..... what do planners need to consider?

- Whether a SuDS is appropriate including, having consulted the LLFA, what sort of SUDS would be reasonably practicable?
- Are the proposed minimum standards of operation appropriate?
- Are there clear arrangements in place for ongoing maintenance?

Information sought should be no more than necessary, having regard to the nature and scale of the development concerned



Planning guidance..... what SuDS should be considered?

Generally, aim should be to discharge surface run off as high up following hierarchy of drainage options as **reasonably practicable**:

- into the ground (infiltration)
- to a surface water body
- to a surface water sewer, highway drain, or another drainage system
- to a combined sewer



Planning guidance..... what is 'reasonably practicable'?

- Judgement of **reasonably practicable by reference to Defra's technical standards** and takes into account design and construction costs
- Defra's technical standards relate to design, construction, operation and maintenance of SuDS
- In terms of overall viability of a proposed development, expecting compliance with technical standards is **unlikely to be reasonably practicable if more expensive than complying with building regulations** – subject to flood risk caveat
- A particular discharge route would **not normally be reasonable practicable when an alternative would cost less to design and construct**



Planning guidance..... design and construction costs?

- Design should take account of construction, operation and maintenance requirements of both surface and subsurface components
- SuDS should be designed so capacity takes account of likely impacts of climate change and likely changes in impermeable area within development over its lifetime
- Construction costs can include the opportunity cost of providing land for a drainage system above ground where the land utilised for the drainage system is not also utilised for another land use



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Planning guidance..... maintenance and operation?

December 2014 WMS expects the SuDS to be designed to ensure that the maintenance and operation requirements are economically proportionate.

- economically proportionate should be considered by reference to costs that would be incurred by consumers for the use of an effective drainage system connecting directly to a public sewer



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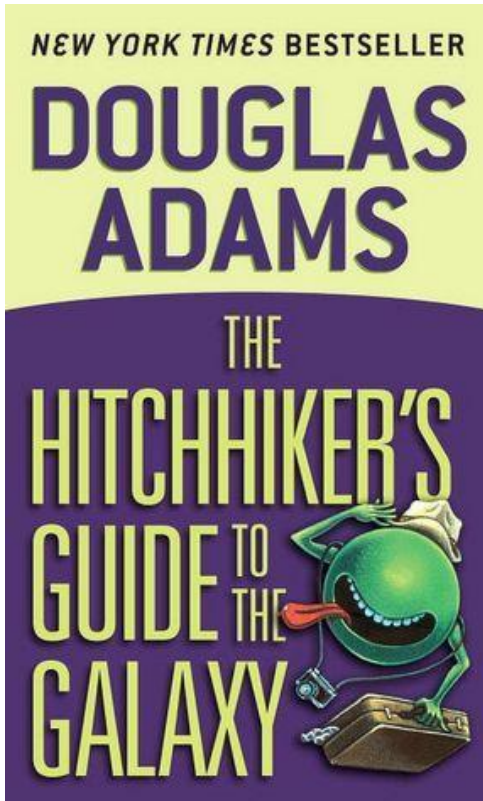
Planning for SuDS..... what it means for you?

- Fully consider from outset – look at local plan / follow structured approach to flood risk assessment
- Think whole development – not as bolt-on extra
- Look for pre-application engagement
- Be clear on the information needed to support your application – what you intend and why
- Have defined and workable arrangements for future maintenance
- Evolution not revolution



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Planning for SuDS.....



National Planning Policy Framework

<http://planningguidance.planningportal.gov.uk/blog/policy/>

Planning Practice Guidance

<http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

Defra non-statutory technical standards
for sustainable drainage systems

<https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards>