Sustainable Drainage Approval Body (SAB)

- Schedule 3 of Flood and Water Management Act 2010
- What is a SAB application?
- What is the SAB?
- Why do we need SUDs in Wales
- Why the SUDs approach
- Welsh Statutory Standards
- Approval process
- Caerphilly’s SAB set up

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Flood & Water Management Act 2010
Schedule 3: Sustainable Drainage

Commencement Date: 7th January 2019

- All new developments of more than 1 dwelling or where the construction area is => 100m² require Sustainable Drainage Approval

- Design, built and maintained to Ministerial Standards

- Approved by the SuDs Approval Body (SAB), prior to commencement
What is a SuDs Application?

- Demonstrates compliance to the Statutory SuDs Standards
- Submitted to the SAB
- Be in a form prescribed by the SAB
So, what is a SAB?

SuDs directly deliver and contribute to our statutory functions

- Under Schedule 3 FWMA 2010 **duty** to approve SuDs
- **Flood & Water Management Act 2010**

- Duty to Adopt in compliance with standards
  - **Except single curtilage sites**

- Act alongside Lead Local Flood Authority Functions
  - i.e Ordinary Watercourse Consent, Asset Register
Why do we need SuDs in Wales?

SuDs are nothing new

- Surface Water is a serious problem
  A major cause of flooding impacting citizens, communities and the economy.

- Flood risk is on the increase
  Owing to climate change and urbanisation

- Increased Local Flooding due to overloading of constrained and ageing drainage systems
  Limiting development opportunity
Why the SUDs approach? …… nothing new…been around for years

- SUDs mimics natural drainage
  Close to source…multiple additional benefits

- Tradition drainage – Pipe to pond/tank.
  Large volumes.. No additional benefits…adoption issues

- Management Train using series of components
  Spreads the volumes…. Additional benefits

- Working with natural processes
Why the SUDs approach?......

- Improved water quality
- Easy to maintain
- Benefits:
  - Access to green space
  - Improved air quality
  - Biodiversity
- Support development resilience to climate change
Welsh Government Statutory Standards...

- Set of over-arching Principles
- Standards
- Guidance on delivery of Technical Standards
- Demonstrate how they have complied with these principles or provide detailed justification for any departure.
Welsh Government Statutory Standards...

- **Six Standards**
  - S1. Runoff Destination
  - S2. Hydraulic Control
  - S3. Water Quality
  - S4. Amenity
  - S5. Biodiversity
  - S6. Construction, Operation & Maintenance
Statutory Standards...

- **Six Standards**
  - **S1. Runoff Destination**

  **Priority 1:** Surface Water (SW) is collected for use
  **Priority 2:** SW is infiltration to ground
  **Priority 3:** SW is discharged to watercourse
  **Priority 4:** SW is discharge to a SW Sewer, Highway Drain or another drainage system
  **Priority 5:** SW is discharged to a combined sewer

  Drainage across a site will have difference destinations. i.e not all to watercourse.
Statutory Standards...

- Six Standards
  - S2. Hydraulic Control

Manage SW Runoff from and on the site to protect;
  - people
  - property
  - environment
  - water quality
  - morphological changes
Statutory Standards...

- **Six Standards**
  - **S3. Water Quality**

Manage SW Runoff from and on the site to protect;
- people
- property
- environment
- water quality
- morphological changes
Statutory Standards...

- Six Standards
  
  S4. Amenity

SuDs are visually better, provide education etc.

Enhance the provision of high quality, attractive public space which provides Health & Wellbeing Benefits.
Statutory Standards...

- Six Standards
  - S5. Biodiversity

Create ecologically rich green/ blue corridors in development

Enrich biodiversity value by linking network of habitats and ecosystems together
Six Standards

S6. Design for Construction, Operation & Maintenance

Design robust SW drainage systems which are:

- Easy/ safe to construct
- Easy/ safe to maintain
- Easy / safe to operate.
Approval Process

- A fundamental change
  - All design information submitted up-front (Full App) to make a determination
  - All Wales Application Form
  - Limited scope to use conditions.

- SAB Legal Agreement
  - Secure Non-Performance Bond
  - Maintenance Funding
  - Inspection Regime
  - Land Transfers etc

- Appeal & Enforcement Process
Caerphilly’s Sustainable Drainage Approval Body

What’s been done for implementation……..

- Being part of various Welsh Government Advisory/ T&F Groups
- Purchased Software
- Set up processes and procedures
- CCBC SAB Website
- Application Forms
- Developing Online Payments
- SuDs Training courses
- Regional working
- Service Level Agreements (with other LA’s)
- Developing Legal Agreements
- SuDs Design & Adoption Manual
- Developer Engagement Workshops
- Consultant Engagement Workshops
- Internal Awareness Workshops

Caerphilly is leading the way on SuDs implementation
Sustainable Drainage Approval Body (SAB)

Setting up a SAB...

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Caerphilly Sustainable Drainage Approval Body
What's been done for implementation……..

- Engagement/ Awareness
- Application Forms
- Processes and Procedures
- SuDs Design & Adoption Manual
- Being part of various Welsh Government Advisory T&F Groups

Caerphilly is leading the way on SuDs implementation
Welsh Local Government
What's been done for implementation......

- 22 Unitary Authorities in Wales
  - 22 Lead Local Flood Authorities
  - 22 Sustainable Drainage Approval Bodies
    All deliver a wide range of services. In SAB terms... 22 ways to deliver the same function.

- Regional Working
  Welsh Government keen to promote regional collaboration.
  Consistent approach to SAB delivery across Wales

- Some not receptive to new approach
Engagement & Awareness
Trying to create a consistent message…….

- Consistent message from WG/ WLGA
  - WG Consultations
  - WLGA Briefing notes – shared by SAB’s
  - Statutory Guidance for LA
  - Training (all Wales)

- Developer / Consultant Workshops
  - House Builders Federation
  - A new approach
  - Forming relationships

- Internal Local Authority Awareness
  - Internally 12 workshops... who is impacted?
    - Parks & Landscaping / Building Consultancy
    - Highways / Rights of Way
    - Planning / Engineering projects
Engagement & Awareness
Trying to create a consistent message.

- External Issues
  - Providing mixed messages
  - Inconsistent implementation advice

Some advising clients to put a pond at the corner of the sites.
Despite this....... Questions and still dispelling myths.....

- What is Sustainable Drainage?
- What is the SAB?
- Do I need to do this?
- SuDs will cost more money
- It will be a hazard
Application Form
What's been done for implementation……..

- Application Forms – *All Wales Standard*
- T&F Group - Mixed group from across Wales, including DCWW.

- **What forms do we need? The minimum....**
  - Pre-Application
  - Full Application
  - Discharge of conditions
  - All with detailed guidance
Application Form – Pre-Application

What's been done for implementation......

- Non-technical validation
- Applicant details
- Site details
- Fee
- Compliance statements

- Technical Assessment – What is the minimum for meaningful advice
- Compliance to Principles
- Compliance statements (Standards S1 to S6)
- Evidence

- Checklists
- 37 pages
Application Form – Full Application

What's been done for implementation……..

- Non-technical validation
- Applicant details
- Site details
- Fee
- Compliance statements

- Technical Assessment
  - Assessment of flood risk
  - Compliance statements (Standards S1 to S6)
  - Discharge hierarchy
  - Infiltration assessment
  - Non-performance bond, adoption, option & maintenance

- Checklists
- 36 pages
Process & Procedure
What do we do from 7th January?....

- Develop new processes
  - Mapping activities step by step
  - Inform applicants how it works

- Technical Approval
  - Clear audit trail needed
  - Standard letters
  - Standard process
  - Standard approach
  - Software
Local Policy & Guidance

What is the local context.....

- CIRIA SuDs Manual
  - Technical Standards

- CCBC – Design & Adoption Manual
  - What is the process in Caerphilly?
  - How do I get my site Adopted?
  - Planning/Open Space implications

- Local Policy
  - Pre-Application Fees, charging regime
  - Land Drainage Byelaws
Implementation Groups

Other aspects considered

- **Fees, Bonds and Commuted sums**
  - **SAB duty to adopt**
    - £168 charge per inspection
    - Non-performance bond

- **How do we fund maintenance?**
  - Commuted sums – needs consistency
    - 60 / 120 lifetime of development
    - Maintenance + replacement costs
    - Cost of the SAB undertaking works
    - Discount rate
    - County Surveyors Society methodology

- Nothing new! Used for S38/ S278
2019... A year of change for SuDs?

- Are you watching Wales?.....
- We will make it work!

Any questions?