Making Consultation
Work with Partners

1. Kent’s situation
2. Partners
   a) Local planning authorities
   b) Environment Agency
   c) Infrastructure providers/authorities
3. Developers
Susdrain – SuDS and planning – making the new regulations work

Bronwyn Buntine – Kent County Council

04/06/2015

Total Major Planning Decisions
Total Minor Planning Decisions
Permanent dwellings started
Housing projection 2011-2031

2014 = 504 applications

Consultations for 2015

• Assuming 540 applications pa
• Requires 2 FTEs
• Impacted by:
  o Time spent on pre-application
  o Type of consultation
  o Involvement with adoption & maintenance
  o Unnecessary consultation
Kent & our partners

*What do they want?*

- 12 Local planning authorities
- Environment Agency
- Sewerage undertaker
- Internal Drainage Boards
- Highways authority
- Developers & house builders

- What is required to validate?
- How do we condition these requirements?
- How do we address long-term maintenance?
- Where are the lines of transition between responsibilities?
- How can we help?
- Does this connect to our system?
- Is land drainage involved?
- Does this impact our catchment?
- Does this impact my adoptable highway?
- What do we need to do?

Local Planning Authorities

1. What is required to validate?
2. How do we condition these requirements?
3. How do we address long-term maintenance?

- Communication
  - Review of options
  - Agreement on approach
  - Communication through KDCOG
- Exchanging views
  - SuD$s training
  - Planning input
- Co-location
Infrastructure providers/authorities

- Does this connect to our system?
- Is land drainage involved?
- Does this impact our catchment?
- Does this impact my adoptable highway?

Highways internal consultation
  - Coordinating responses
  - Discussing possible adoption
- Degree of uncertainty in relation to receiving system
- Assessed on a case-by-case basis
- Possible options:
  - Develop a protocol
  - Wait for Government

Environment Agency

- EA staff on secondment
- Matrix for consultation
- In-formal agreement as to in-progress consultations
- Hosted meetings with LPAs
- Application of “Critical Drainage Areas”
  - No CDAs within Kent
  - Use of “Areas of High Local Flood Risk”

Where are the lines of transition between responsibilities?
- How can we help?
Developers

Compliance would be defined by:

**NPPF & PPG**

- Para 100: inappropriate development in areas of flood risk
- Para 103: ensure flood risk is not increased elsewhere and gives priority to use of SuDS
- Para 109: contribute to and enhance the local and natural environment

**Non-Statutory Technical Standards for Sustainable Drainage**

- Published by Defra on 23 March 2015

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Kent’s Approach to consultation

Source:
Kent’s *draft* SuDS Policies

<table>
<thead>
<tr>
<th>TECHNICAL STANDARDS</th>
<th>WIDER POLICY</th>
</tr>
</thead>
<tbody>
<tr>
<td>[4] Seek to reduce existing flood risk</td>
<td>[10] Link to wider landscape objectives</td>
</tr>
<tr>
<td>[6] Design to be maintainable</td>
<td></td>
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</tbody>
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Submission Requirements

FLOOD RISK ASSESSMENT / DRAINAGE STRATEGY

• A submission must demonstrate that the drainage scheme proposed:
  – Protects people and property on the development site from flooding; and,
  – Does not exacerbate the flood risk outside of the development in any part of the catchment, either upstream or downstream.

• Any drainage scheme must:
  – manage all sources of surface water, including exceedance flows and surface flows from offsite;
  – provide for emergency ingress and egress; and,
  – ensure adequate connectivity within any existing drainage system.

Submission Requirements

What should a Sustainable Drainage Strategy include?

A Sustainable Drainage Strategy should include the following information:
• A plan of the existing site
• A topographical plan of the area
• Plans and drawings of the proposed site layout identifying the footprint of the area being drained (including all buildings, access roads and car parks)
• The controlled discharge rate for a 1 in 1 year event and a 1 in 100 year event (with an allowance for climate change), this should be based on the estimated greenfield runoff rate
• The proposed storage volume
• Information on proposed SuDS measures with a design statement describing how the proposed measures manage surface water as close to its source as possible and follow the drainage hierarchy in the London Plan
• Geological information including borehole logs, depth to water table and/or infiltration test results
• Details of overland flow routes for exceedance events
• A management plan for future maintenance
Pre-application

• Requires good communications: early, timely and appropriate
• Consideration of issues collectively
• Difficulty given uncertainty in relation to adoption
• Question for LLFA regarding cost implications

“Good” example of discussion
• Consideration of drainage within layout
• Clashes with open space identified earlier
• Alternative solutions sought

Summary

• All partners require communication
• There must be clear definition of expectations:
  – Between LLFA and LPA
  – Between LLFA and EA
  – Between LLFA and other authorities
• There must be clear definition of requirements for compliance & submission
Susdrain – SuDS and planning – making the new regulations work

Enquiries, pre-app, and consultation

suds@kent.gov.uk