

SuDS & Planning – Making the new regulations work

Making Consultation Work With Partners

4 June 2015

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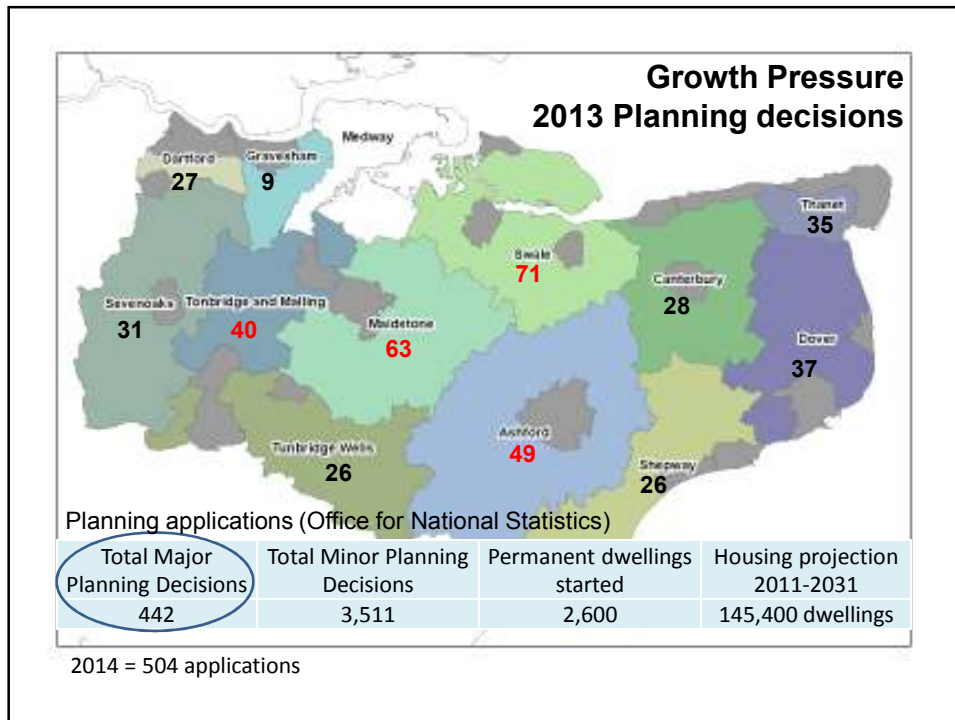
Sustainable Drainage Engineer



Making Consultation Work with Partners

1. Kent's situation
2. Partners
 - a) Local planning authorities
 - b) Environment Agency
 - c) Infrastructure providers/authorities
3. Developers





Consultations for 2015

Within KCC remit				Grand Total
LPA	NO	YES		
AS		5	5	
CA		1	1	
DA		1	1	
DO	1	4	5	
GR		1	1	
KCC		15	15	
MA	1	7	8	
SE	1	4	5	
SH	1	6	7	
SW		1	1	
TH	3	5	8	
TW	1	1	2	
Grand Total	8	51	59	

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

Month Received	LPA												Grand Total
	AS	CA	DA	DO	GR	KCC	MA	SE	SH	SW	TH	TW	
Mar		1				1							2
Apr	2				1	5	3	2	5		5	1	24
May	3		1	5		9	5	3	2	1	3	1	33
Grand Total	5	1	1	5	1	15	8	5	7	1	8	2	59



Kent & our partners

*What **do** they 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
 - SuDs 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

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



Application of “Critical Drainage Areas”

- No CDAs within Kent
- Use of “Areas of High Local Flood Risk”



Developers

- What do we need to do?



Development Management Procedure Order:
LLFAs are consultees for "major development with surface water drainage"

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

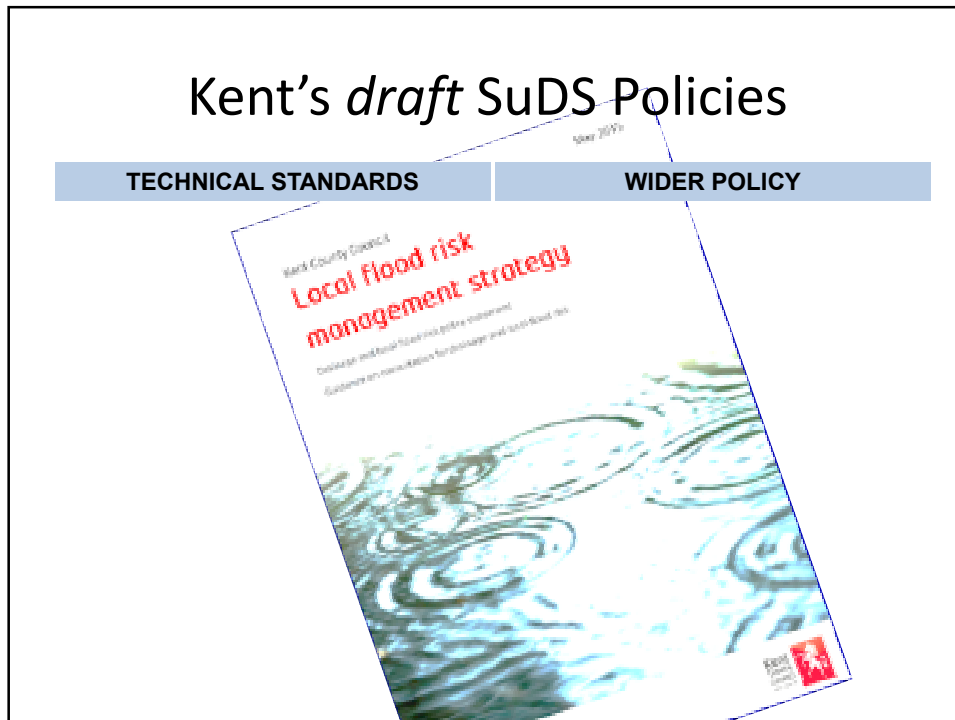


Kent's Approach to consultation



Source:
"Planning Advice for Integrated Water Management", Cambridge Natural Capital Leaders Forum, 2015





Kent's *draft* SuDS Policies

TECHNICAL STANDARDS	WIDER POLICY
[1] Follow the drainage hierarchy	[7] Safeguard water quality
[2] Manage flood risk through design	[8] Design for amenity and multi-functionality
[3] Mimic natural flows and drainage flow paths	[9] Enhance biodiversity
[4] Seek to reduce existing flood risk	[10] Link to wider landscape objectives
[5] Maximise resilience	
[6] Design to be maintainable	

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



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Enquiries, pre-app, and consultation

