



**Surface water management
statutory consultee role**

Matthew Panou
SuDS Engineer



FRM Team

- Two tier authority
 - Six districts
 - Seven Local Planning Authorities
- Strategic planning/infrastructure
- Lead Local Flood Authority duties
 - Statutory consultee role
 - Local Flood Risk Management Strategy
 - Developing and project managing FAS
- Six FTEs
 - 2 dedicated SuDS Engineers
 - 4 FRM Officers

Policy drivers 


*“.....to fulfil the statutory duty
of Gloucestershire County Council”*

GCC/LLFA - Comment on the surface water flood risk and management and maintenance

- All major applications.
- Comment on the “management of surface water” for flood risk
- Formally respond within 21 days

The LPA - Arrange and agree on the management/adoption of the SuDS


- Must satisfy themselves that the proposed minimum standards of operation are appropriate
- Ensure through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development

Policy and guidance 

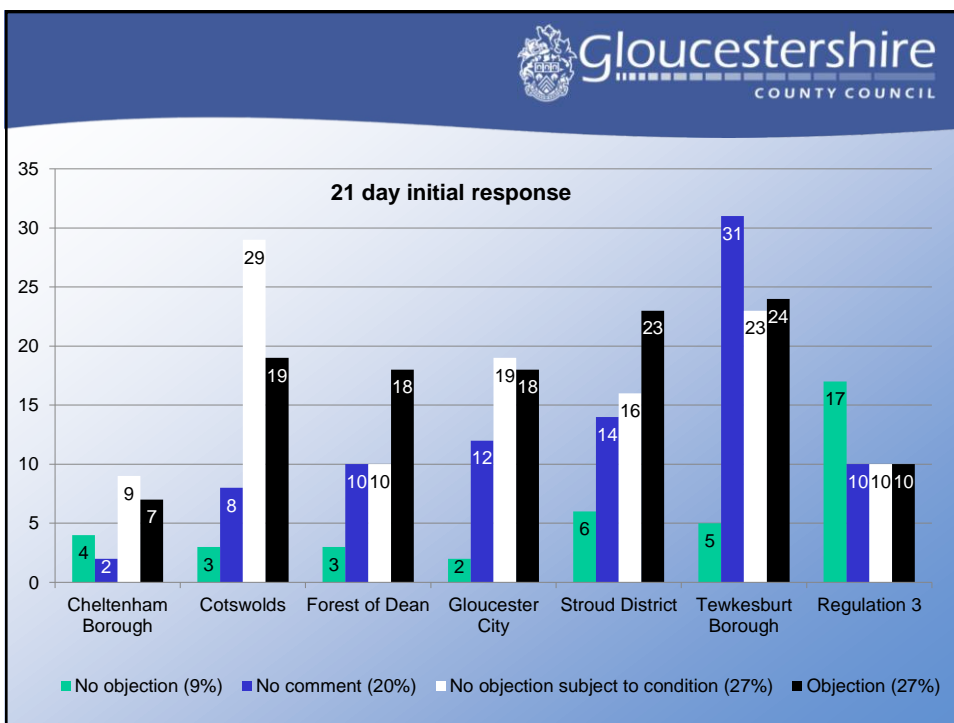
Key policy and guidance documents


- NPPF
- Non-statutory Technical Standards
- Building Regulation H
- CIRIA’s SuDS Manual (C753)
- Gloucestershire’s SuDS Design and Maintenance Guide
- LASOO’s Non-statutory Technical Standards Guidance

Initial approach



- 1) Provide bespoke consultation responses within 21 days to all major planning applications and all Regulation 3 applications.
- 2) Recommend the approval of applications that demonstrate the surface water flood risk will not be increased to the site and elsewhere, and whose principle is appropriate in terms of SW flood risk. Recommend conditions where applicable.
- 3) Recommend the LPA to object to applications with insufficient detail which prevents GCC to appropriately assess the site's surface water flood risk and the adequacy of the proposed drainage system
- 4) Recommend the LPA to object to applications where the proposal is non-compliant with the relevant policy document.




Strategy – Outline apps  Gloucestershire
COUNTY COUNCIL

“... A lack of information on surface water drainage is not sufficient alone to object to an outline for 1000 dwellings”

For sensitive sites a coherent outline drainage strategy that demonstrates flood risk will not be increased to the site and elsewhere.

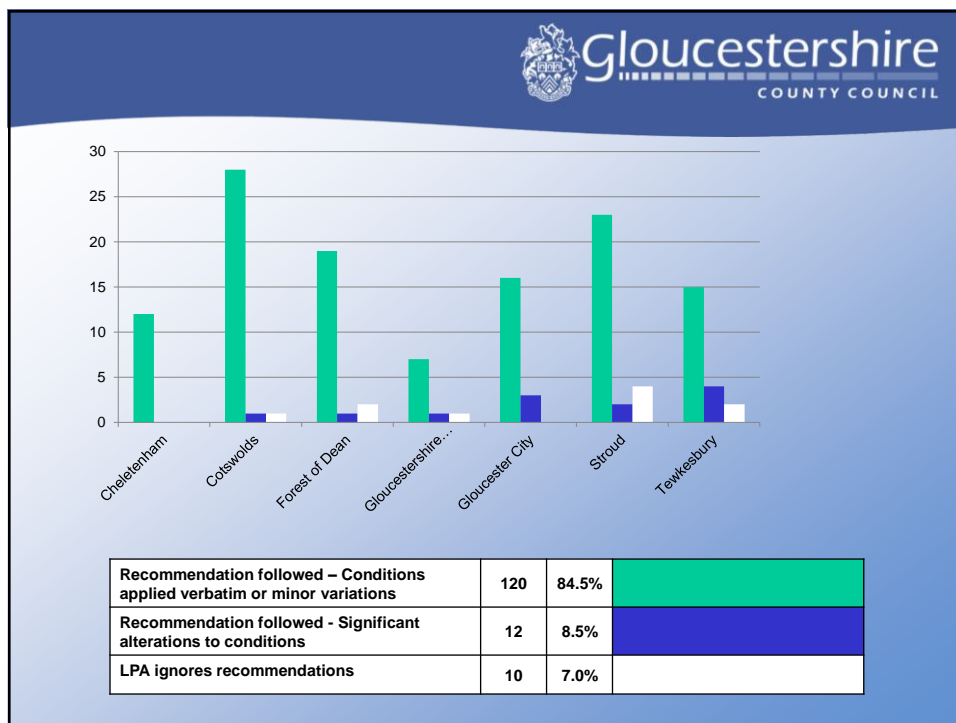
- Existing flood risk
- Runoff rates and volumes (pre and post, on and off site)
- Discharge type/point/condition

Strategy – Full apps  Gloucestershire
COUNTY COUNCIL

“... Can you not just condition it?”

Coherent drainage strategy that demonstrates flood risk will not be increased to the site and elsewhere.

- Existing flood risk
- Runoff rates and volumes (pre and post, on and off site)
- Discharge type/point/condition
- Indicative drainage plan
- Water quality considerations



- Issues and concerns**
- Gloucestershire COUNTY COUNCIL**
- 3rd party consent - “..... That’s illegal!”
Third party landowner consent shall be submitted to and approved in writing to the Local Planning Authority sufficient?
 - The basics and lack of information
 - Minimum discharge rate – 5 l/s
 - Redline boundary
 - Amenity/biodiversity
 - EA climate change guidance
 - Construction stage and future maintenance and management

SuDS Group

| | |
|--------------|---|
| Scope | A forum to discuss and share, issues, best practice and advice for officers involved in commenting on the surface water management for all planning application types. |
| Aims | <ul style="list-style-type: none"> - Share best practice and advice between officers involved in commenting on planning application for sustainable drainage systems and flood risk. - Improve the coherence, efficiency and quality of planning application responses and processes, and to strive for a more consistent approach between major and minor/LLFA and districts. - Better quality SuDS that meet the four SuDS design principles - Support between the LLFA, districts councils and other Risk Management Authorities (RMAs). |

SuDS Group

- Standard checklist and minimum requirements
- Response template for officers
- County wide set of standard conditions
- Interaction with water companies
- Approach to water quality
- Develop local standard/guidance