

Getting SuDS right from the start

Summary

Considering SuDS at the earliest stage of land acquisition, or assessment for inclusion in the local plan is beneficial for all those involved in the planning and land/development process. This project will provide principles for the cost-effective integration of SuDS within developments that makes efficient use of available land and informs the earliest stages of the development process. This will be presented in an engaging animation with associated succinct guidance for those making early and key decisions that impact the ambition of the development and the SuDS outcomes achieved.

Background

High quality SuDS that deliver multiple benefits need to be integrated within the layout of buildings, roads and public open space of new developments. This approach supports multi-functional SuDS, the delivery of multiple benefits and efficiently uses available land. It is recognised that to obtain these good SuDS outcomes early engagement between the developer, their consultants, the local planning authority and Lead Local Flood Authority is required.

Typically, it has been suggested that this engagement should happen at pre-application stage. However, often this is undertaken too late where pre-app discussion happen after key decisions on potential development yield, margins and layout have been already made.

Considering SuDS at the earliest stage of land acquisition or assessment of site for land allocation and inclusion in the local plan should be beneficial for all those involved in the planning and land/development process. It benefits land agents and developers by improving their valuation of land, the estimation of profitability, potential property yields and viability. It should also improve the efficacy and certainty of local authority assessments for the land allocation process; improving and expediting the eventual planning application process. It also benefits local planning authorities by helping them demonstrate the soundness of their local plans and compliance with other requirements and local policies including flood risk, climate change adaptation, water quality, biodiversity and other health and wellbeing requirements that contribute to improved natural capital. Local communities also benefit from attractive developments that not only manage flood risk well, but also deliver multiple benefits that improve the quality of the places where they live, work and play.

Nationally there is no prescribed or detailed guidance for local planning authorities (LPAs) “calling for sites” or the assessment of land for its allocation in the local plan. Consequently, there is inconsistency in approaches and the level of detail of information required for strategic and technical assessment of sites undertaken by LPAs varies. Likewise, the quality of information provided on sites by land agents and/or developers as part due diligence or initial site investigation is inconsistent.

Sites are often assessed for inclusion in the local plan in terms of their suitability, availability and achievability for housing and commercial purposes. This considers various factors like existing site constraints (flood risk, access, ecological sensitivity), and land designations (e.g. Green Belt). Depending on the type and scale of the site further technical assessment may be undertaken on drainage, highways and landscape assessment. Typically larger, and more constrained sites would require more detailed assessment and some form of masterplanning. However, it's more common that SuDS and their integration within developments are overlooked and only considered at the planning application stage which is often too late.

Why is guidance needed?

There is a perceived commercial trade-off between the 'land-take' for SuDS and the maximum number of properties on a development. This means that developers and their consultants can be unable and/or unwilling to embrace SuDS good practice, i.e. their full integration, regardless of the potential benefits this can offer developments.

This project will focus on improving early consideration and decisions on SuDS in developments. It will provide guiding principles for the cost-effective integration of SuDS which informs the land acquisition and land allocation process. The key stages of the planning land development process the guidance will cover include:

- Land acquisition (and necessary due diligence at all stages of the process)
- Call for sites as part of local plan preparation
- Housing and economic land availability assessments
- Local plan land allocations

This guidance would improve both the submission and assessment of site information relating to SuDS ensuring the early ambition for SuDS is delivered throughout the planning and land/development process without late stage 'value engineering' and viability considerations which can compromise high quality SuDS. This would support the delivery of high-quality holistically integrated SuDS that make the best use of available space to deliver multiple benefits and meet policy requirements. This could also benefit developers, through attracting a premium for properties sold as sites with an attractive SuDS scheme.

As well as reducing the likelihood of poor-quality SuDS where surface water runoff is unnecessarily managed underground, and opportunities to integrate attractive SuDS into the development are lost this guidance will help deliver SuDS that are cost effective, easy to maintain and provide a wide range of benefits to people and the environment.

Aims and objectives

The overall aim of the project is to provide succinct, accessible and engaging guidance on the principles for the integration of SuDS into developments to inform the land acquisition and allocation process. This should improve how flood risk is considered, the delivery of SuDS and compliance with the requirements of the National Planning Policy Framework and the emerging requirements for Design Codes.

The specific project objectives are to:

1. Engage with local authority planners, land agents, land surveyors, developers and their consultants to better understand the opportunities and challenges of integrating SuDS within developments. This would be focussed on how discussions/decisions within the early stages of the planning land/development process can support or hinder the latter integration of SuDS.
2. Develop high level principles for the assessment of sites at land allocation submission stage to ensure flood risk, surface water management and particularly SuDS are holistically considered and can be tracked through the development process.
3. Develop high level principles on the integration of SuDS from the outset of the land acquisition and allocation process for land agents and developers.
4. Identify and showcase case studies that exemplify good practice and benefits of early consideration and integration of SuDS
5. Provide accessible and engaging guidance on principles for the integration of SuDS to inform land acquisition and assessment for land allocation in local plans and/or planning applications.

Target audience

The target audience for this proposal will primarily be key decision makers at local planning authorities, developers, land agent/promoters and others working the planning and land/development process. The target audience is likely to include the following:

- Local authority planners
- Developers and client organisations
- Land agents/promoters
- Land coordinators
- Land surveyors
- Lead Local Flood Authorities
- Water and Sewerage Companies
- Drainage engineers
- Infrastructure engineers
- Master planners / spatial planners
- Urban designers / architects landscape architects
- SuDS designers

Approach and outputs

This will be determined by the Project Team with feedback from funders and Project Steering Group but the potential approach could include:

1. **Focussed review** – Guidance and case studies on relevant good practice will be collated (this will include CIRIA guidance, central and local government outputs). This is likely to cover master planning, design codes, SuDS and the planning and land development process. There will also be a review of relevant planning consultations and future drivers.
2. **Engagement** – Representatives of the target audience with experience relating to the planning and land/development process and SuDS delivery will be engaged. This is likely to be undertaken by workshop and interviews to explore opportunities and constraints including:
 - a. Enabling early engagement
 - b. Developing an early vision and ambition for SuDS within the land/development sector
 - c. Local government role and opportunities
 - d. Role of the developer and land agent
 - e. Key stages and timescales of the project cycle
 - f. Possible principles for considering and assessing SuDS in early land/development proposals.
3. **Develop initial principles and skeleton structure** – Draft principles for the consideration and assessment of SuDS will be developed together with a skeleton structure and/or storyboard for the guidance and animation.
4. **Development of guidance** – This will be done iteratively with opportunities for the Project Steering Group to review the final text (twice) and graphics used within the guidance and animation.

Outputs

Concise and engaging guidance will be developed on approaches to secure good SuDS outcomes early in the planning and land/development process. It is envisaged that a short (free electronic) guidance document complemented by a two-minute animation will be developed. High level principles supported by guidance including information on:

- Approaches to determine runoff destination
- Working with site opportunities and overcoming constraints (relating to site conditions, existing infrastructure)
- Level of synergy between SuDS and other planning considerations (delivering multiple benefits, optimising public open space)
- Presentation of potential SuDS components, their space requirements, benefits and longer term considerations

CIWEM has offered to endorse the outputs and other potential supporting organisations will be explored as well. The contents and structure of the guidance and animation will be discussed at stage 3. However, the structure could follow.

1. Policy drivers (climate and ecological emergencies (flooding and biodiversity net gain), place making)
2. Why early consideration of SuDS makes sense
3. How SuDS should be considered

- a. Process, source of information, signposting
- b. Appropriate stakeholder interaction and collaboration
4. Principles for integrating SuDS
 - a. Integrating SuDS with road layout, buildings and public open space
 - b. Inclusion of SuDS within masterplans that deliver on other local plan policies.
 - c. How the extent of SuDS integration benefits the site, reduces land take and influences site viability
5. Principles for assessing SuDS inclusion at land allocation stage

Project information

The project is estimated to cost £110k and will take 6 months to complete. For further information please contact Louise Walker (louise.walker@ciria.org, 07552 163016)