



Consultation response summary

Background

Following its development by a Task and Finish Group of practitioners from across the North West, a draft North West Sustainable Drainage (SuDS) pro-forma has been subject to consultation. The pro-forma is for use by Local Planning Authorities to gather and share information on sustainable drainage proposals for new major developments.

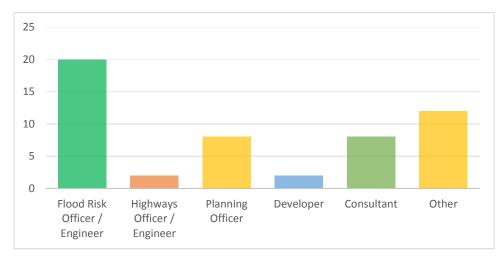
The consultation ran for 4 weeks from 27 January to 21 February 2020.

This document summarises the feedback received to each section of the pro-forma and sets out how the feedback has been addressed to produce the final version of the pro-forma.

With the exception of the first graph on respondent types, the graph data relates only to the 41 responses which answered the survey questions.

Summary of responses

A total of 48 responses were received. Most responses came from flood risk officers or engineers but there was also a good spread across planning officers, developers, consultants and others. See graph below for the breakdown. (Note that some respondents ticked more than one category.)



36 responses were received via the online survey. A further five answered the survey questions but via email slightly after the deadline. The final seven responses were more general comments received via email.

For the full list of respondents, see Appendix A.

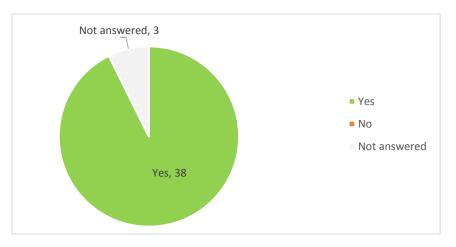




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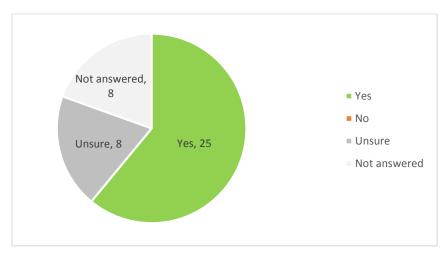
Consultation findings

There was strong support for the concept of a North West SuDS pro-forma and an openness to its adoption by local authorities.



Q: Is your organisation supportive of the concept of a North West SuDS pro-forma?

Q: Would your organisation be interested in adopting the North West SuDS pro-forma for use?







Section	Key themes	Action taken to address
Section 1 - Development details	·	·
Do you think the information asked for is reasonable?	• The information asked for was broadly supported, at least for full applications, with many respondents feeling it was essential.	
Unsure	 As it could appear slightly onerous, it was recommended that the benefits of the pro-forma are made clearer for users e.g. getting all the required information right first time speeds up the application process. 	Signpost to the guidance notes.
Somewhat Yes	 Several suggested that the information required is possibly excessive (and costly) for pre-application stage, outline applications and reserved matters applications. Potentially need a more limited pro-forma for these. 	• This has been covered in guidance notes. Information provided should be proportionate to the planning stage.
• Yes • Somewhat	 The need for the Type of Planning Application was questioned as that may be provided by the application reference. Suggested additions include: 	 Addressed by a change on the pro- forma.
 No Unsure Not answered 	 Additional Application types (including whether Major or Minor) 	• LLFAs are only statutory consultees for Major Applications.
	 New section for drawing/ document references Anticipated housing count, both pre and post development 	 New section added to facilitate this. Addressed by a change on the pro- forma.
	 Areas of site covered by EA Flood Maps for Planning or Surface Water 	• Added to Section 1 on the pro-forma.
	• One respondent questioned who would actively use the information and whether those assessing applications have the necessary technical skills and/or capacity to consider it in detail.	• It has been acknowledged that the validation process will be a quantitative process rather than qualitative exercise.



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Is there anything on the page that could A few respondents felt the look and feel of the pro-forma Some changes made to pro-forma ٠ ٠ be clearer? feels complex and could be made clearer and more userdesign. Will be reassessed after a trial friendly. period – make changes following active use/feedback. Not answered Supporting guidance note now provided. A common theme was the need for supporting guidance • ٠ for those completing the pro-forma. There could be a clearer distinction between (and There are reasons for requesting the ٠ • guidance on) information that is mandatory vs advisory information – guidance has now been (for both applicants and planners) produced to support each section of the Yes Several respondents felt the need for greater clarity of pro-forma. • No terminology and distinction of options in the Changes made to wording on pro-forma. • Development Type section, including providing for sites which are a mixture of greenfield and previously developed. One questioned the reason for and appropriateness of Considered under Section 2. ٠ • excluding open space in the 'Area served by proposed Yes No Not answered sustainable drainage system'. One gueried the degree to which a common standard Aiming for clarity and consistency across • • across the North West is needed and where local LPAthe NW. Fewer iterations and less time specific variation is appropriate e.g. consuming. Designed with adoption in Use of asterisk is not clear – better to use numbered mind. ٠ footnotes if required.





Is all the necessary minimum information	• As for section 1, there were questions about:		
asked for?	 the level of information required for different 	0	'For outline or reserved matters
Not answered	 Application Types (e.g. pre-application, Outline, Full) whether terminology is always accurate (e.g. 'conceptual' vs 'outline') the need for guidance and signposts to be clearer on the sections that must be completed for each application type. The need for the impermeable area (and change) was questioned if we aim for all greenfield run-off. There were requests to clarify the wording of the evidence checklist in the Conceptual Drainage Design section. 	•	 application, go to Section 3' – This has been removed from the Section 2 title bar to avoid confusion. The word 'conceptual' has been removed and brief explanation of requirements added. No change made. 'Conceptual' has been removed from this section with explanation below.
■ Yes ■ No = Not answered	 One respondent questioned the feasibility of managing run-off from permeable surfaces and whether this is consistent with the legislation Suggested changes to the section on existing drainage features included: 	•	Run-off from permeable surfaces need to be considered to avoid under capacity systems.
	 Reference to gully locations against 'Highway drains' in evidence checklist 	0	Word 'gullies' added to checklist.
	 Additional 'Don't Know' option against drainage features already on the site where not fully charted 	0	Option added.
	 Yes/No/Not applicable options against each type of feature 	0	This was not added as it was considered it would make the form too
	 Other suggested additions included: Party responsible for existing drainage system Ask applicants how they have considered the impact of the development on flows through the site as well as flows generated by the site. 	0	complicated. Additional detail added to pro-forma. Note added to guidance notes.





	 Addressing urban creep allowances as it affects This is already addressed further down the pro-forma.
Section 3 - Calculate Peak Discharge Rates	
Is all the necessary minimum information asked for?	 One respondent suggested that the titles and labelling of the pro-forma sections could be improved to distinguish more clearly between pro-forma sections and how they Details of the appropriate technical standard are included.
Not answered	 are addressing the relevant sections in Defra's Non- statutory technical standards for SuDS guidance. A common theme was around the methodologies used to calculate discharge rates including: Requiring applicants to use one of the recognised best practice methodologies Requiring applicants to specify the methodology used in the pro-forma Providing supporting guidance and additional detail
• Yes • No • Not answered	 around the evidence checklist e.g. Microdrainage outputs. Another common theme was around the requirement for a reduction in discharge rates for brownfield (previously developed) sites. Respondents questioned whether it is most appropriate to: Amendments made to clarify that new drainage should be equivalent to greenfield runoff rates.
	 Specify a minimum reduction rate Specify a fixed reduction rate Specify different reduction rates depending on certain criteria Aim for greenfield run-off rates.





Section 4 - Calculate Discharge Volume Is all of the necessary minimum	Similar to section 3, respondents suggested the need for	Note made in guidance.
information asked for?	applicants to state the methodology and software used, and felt supporting guidance is needed.	• Note made in guidance.
Not answered	 One respondent suggested the pro-forma should require a specific methodology and software to be used. Suggestion to combine sections 3 and 4. Suggested additions: 	• Specifying one methodology could be too onerous for some consultants and developers.
Yes	 1:100 Year plus Climate Change allowance 	 Climate change is dealt with in section 5.
Yes No Not answered		
Section 5 - Storage Is all the necessary information asked	Suggested need for applicants to make clear whether	Considered not appropriate as should
for?	storage is on or off site.	be clear from supporting plans.
	 Again respondents highlighted the need for supporting guidance including glossary of terms. 	 Guidance provided.
Not answered	 A couple of respondents highlighted whether climate change and urban creep allowances should be specified explicitly. 	 Details on allowances provided in guidance.
No Yes	• There was a common theme requesting additional clarity around the requirements for no flooding onsite/offsite in specific rainfall events.	• Further information included in guidance.
	 It was questioned whether the details and supporting calculations required were a duplication of those provided in previous sections and whether these details 	• Calculations can support more than one section.





Section 6 History of designed and in	 Suggested additions: Additional box to indicate use of long-term storage onsite Information on management of overland flows and details of inlet structures should attenuation capacity be exceeded. Maintenance responsibilities and requirements Evidence checklist to include topographical / flood route drawings containing offsite levels 	 Overland flows requested as part of section 2. Requested as part of section 10. Requested as part of section 2.
Section 6 - Hierarchy of drainage options Do you think the approach set out in the pro-forma supports the application of the hierarchy effectively?	 It was requested that the pro-forma promotes higher quality SuDS and stresses the first preference of source control and retention/re-use of water onsite, and the least preference of combined sewer. Again there were requests for supporting guidance including a glossary with definitions, and links to documentation. Infiltration One respondent commented on the lack of reference to green infrastructure or the other two pillars of SuDS: amenity and biodiversity. One comment that this would be onerous for some major schemes, for example change of use of buildings with over 1000 sq metres where there were no external works proposed. (Point A) Request to include additional options for methodologies for site investigation infiltration testing Questions about whether seasonal groundwater level and the presence of contaminated land are considered. 	 Feedback from the consultation has led to significant changes to this section. Within what was section 9, there were two questions on using surface water re-use, and principles of interception losses. Based on the feedback, these questions now come ahead of discussing the hierarchy (point of discharge) to try and promote water re-use and source control. Changes have been made to the evidence checklist. Also see section 7 below. Glossary of terms/ definitions have now been captured and are included within the supporting guidance.





 One respondent felt the evidence required for proving/disproving infiltration is an unrealistic requirement for most small scale developers (Point C) Request to require geotechnical advice to be from a member of an appropriate professional body Suggestion to require evidence of discussions with third party landowners. Discharge to surface water body Request to require correspondence from body responsible for water body to confirm their approval to discharge. Request that watercourse survey requirement is made wider than site curtilage to fully establish connectivity, capacity and the need for any supporting works offsite. Suggestion to require additional information on water quality status (Water Framework Directive) to inform SuDS options and their water quality benefits. Suggestion to add note that details of assets that are not recorded on the sewer records may be available from the LLFA e.g. watercourses, highway drainage	 The group considered an example site and what was determined from that. It was considered unreasonable for the developer to investigate the condition of the watercourse outside of the red line boundary. If LLFAs want to enforce this, they can cover it in their local policies. The North West RFCC are keen for more Highway Authorities to support this, when it would allow conveyance of
recorded on the sewer records may be available from the LLFA e.g. watercourses, highway drainage	Highway Authorities to support this,





 Is the evidence asked for reasonable? Don't Not answered One respondent raised concerns about the limited knowledge in the industry regarding S115 agreements which are required for a public sewer to discharge to a highway drainage system – need for knowledge development. There is now an opt relevant document numbers to support answers. 	ity of the hierarchy earer.
 Yes Somewhat No Don't know 	nt and or drawing





Section 7 - Infiltration Proposals		
Where ground conditions have not been verified on site nor infiltration testing completed at the time of the application, do you think it is reasonable to ask applicants to consider a 'Plan B' for infiltration proposals (in case on-site testing reveals that infiltration as initially proposed is unfeasible)?	 There was overall broad support for the 'Plan B' ask, indeed some felt it is essential due to infiltration proposals being found to be infeasible during the planning application process. However others expressed the reality that this could be a challenging ask with the requirement currently often being done as a discharge condition. One questioned the level of information required and 	 Note, this requirement is now covered in the evidence checklist for infiltration proposals, due to its direct link. This removes duplication to the form. Pro-forma amended to include and signpost to British Geological Survey (BGS) Infiltration SuDS Map which is
Not answered No Yes	 scrutiny that would be applied to the plan B. One questioned whether it would work in practice as changes to an accepted planning application have to go through a s73 agreement. A couple of respondents felt the ask was not reasonable given the tight budgets often being worked to, the challenges already faced securing suitable SuDS from developers, and the safety factors and worst case assumptions already applied in the software. One respondent commented on the unreasonableness of requiring soakaway testing to disprove infiltration on sites 	 considered a reasonable amount of information to be provided at submission stage. Purpose and expectations of 'plan B' is clarified within the guidance. When published, we will make clear to LPAs and LLFAs that there is an opportunity to produce a Supplementary Planning Document (SPD) for SuDS detailing broad underlying soil and geology types. This
Yes No Not answered	 requiring soakaway testing to disprove initiation on sites underlain by clays/tills. Alternatively could refer applicant to surface geology data. Suggestion that must first consider the peak rate of surface water discharge, to be agreed in writing by the planning authority. Suggested additional question or field for applicants to agree to the imposition of a pre-commencement condition from the outset. 	has been done in other areas of England e.g. Central Bedfordshire Council.





Section 8 - Water Quality Considerations	
Based on your experience, would you be able to complete (if you are the applicant) or assess (if you are a consultee) this section in accordance with CIRIA C753 The SuDS Manual?	 Many respondents did express concerns about whether current skill levels enable effective completion/review of this section and the need for support from LLFA or EA. However the section was also broadly supported and seen as beneficial and recognised as being needed to increase standards and quality of SuDS. Most developers Note this is now section 6. The section has been simplified to focus on defining the pollution potential of the proposed development and identify when more detailed assessment would
Not answered Don't know Somewhat Yes	 are currently still relying on grey SuDS as the preferred option. Some questions raised about how this section relates to Technical Standard s13. One concern was raised about whether local authorities have the necessary powers in relation to water quality and whether an application could legitimately be rejected if this section wasn't completed (once the pro-forma is part of the validation checklist). Suggestion to reduce the detail to a simple question about consideration of water quality. Reference to Technical Standard S13 has been removed. The section aims to help applicants identify an appropriate SuDS management train based on the pollution potential of the land use rather than the pollution potential of non-SuDS measures. Therefore no changes are proposed in this regard.
 Yes Somewhat No Don't know Not answered 	 One respondent highlighted the need for manufacturers to provide hazard and mitigation indices for frequently used non-SuDS drainage infrastructure such as channel drains and silt traps. Manufacturers and therefore developers are applying the outdated PPG3. One respondent made comments on the detail of the Medium hazard level category. Another requested the requirement for a risk assessment even where an environmental permit is not required.





Section 9 - Details of your proposed Su		
Do you think this section will help to facilitate the design of sustainable drainage systems to recognised industry standards?	 There was broad agreement that this section, and the link to the CIRIA SuDS Manual, will at least go some way towards encouraging SuDS which meet industry standards. Some did remark that there is still inconsistencies in industry standards and the guidance can be complex. 	 More space has been provided for Other. Hard engineering is already
Don't know Not answered Yes No Not answered Somew hat Somew hat Somewhat Don't know	 Several respondents remarked that more space on the pro-forma may be required including where the design reflects a hybrid with traditional hard engineering. Others suggested more evidence (e.g. design drawings, proposed topography, exceedance route, destination of overland flow) is required to demonstrate that the design of components is consistent with the SuDS Manual. A couple of respondents felt there was a lack of reference to biodiversity which could lead to a tendency to create SuDS which are less good at providing biodiversity (e.g. swales and basins) rather than the more beneficial wetlands and reedbeds. Several felt there is a need for greater clarity on and stipulation of the exceedance events for which management of flows needs to have been considered. 	 other. Hard engineering is already captured (tanks and pervious pavements). It is currently felt by the group that this is beyond the scope of the pro-forma, however a comment has been included within Section 10. This can be re-visited if biodiversity net gain is introduced. Note components listed are in accordance with those listed in the CIRIA guidance.
	 Additions suggested: Whether the SUDs is within the highway boundary and distance from carriageway edge Additional SuDS options requested: Offsite SuDS (e.g. an integrated SuDS adjacent to several sites) Oversized pipes 	 This level of detail would be for the technical assessment – we cannot capture everything in the pro-forma. Suggest this detail is captured within Local Polices (which Developers will still need to work to). Off-site SuDS and oversized pipes now captured.





If you are an applicant, do you curre design sustainable drainage systems accordance with CIRIA C753 The Sul Manual? Not answered Yes No n/a No Not answ	 in accordance with the SuDS Manual. References were made to local authority SuDS guidance and supplementary planning documents which applicants are also encouraged to refer to. 		N/A for changes to the pro-forma
If you work for a Local Authority, do your Local Policy request that sustain drainage system components should designed to CIRIA C753 The SuDS manual?		•	N/A for changes to the pro-forma
Not answered			
Yes No			
n/a ■ n/a			
No Not answe			





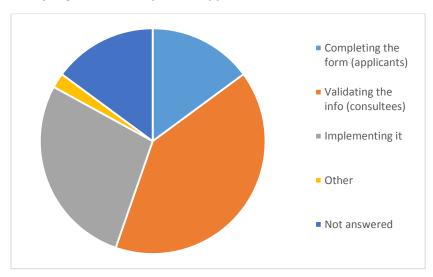
Section 10 - Operation and Maintenance		1	
Do the options included cover all those that available to an applicant to demonstrate that ALL sustainable drainage components can be maintained for the design life of the development?	 There was a common theme in the feedback that this section needs to be developed further to incorporate more detail, possibly as an evidence checklist. Additional detail required includes: Maintenance plans / schedules Contact details of management companies Details of landscape maintenance (as well as SuDS features) Maintenance arrangements for underground assets, offsite components and features on private land Replacement arrangements for SuDS features which won't last for the lifetime of the development. One respondent did however express concerns about the capacity of local authorities to inspect/enforce maintenance of SuDS. Another felt they could inspect SuDS for maintenance when flooding had occurred. 	•	Section has been revised in line with the feedback. This now requests a management plan, maintenance schedule and details of maintenance and management arrangements. Evidence checklist now included and provides detail on the information to be included.
Yes No Don't Know Not answered	 Several respondents felt there may be additional options for adoption e.g. New appointments and variations. In relation to landscape maintenance and Public Open Space, one respondent asked for evidence of council approval to be captured. In relation to adoption by Highways authorities, one respondent highlighted that this is very limited and only for a highways SuDS. One respondent raised the question about how SuDS maintenance obligations on private owners will be 	•	Option for Other now included. Note included to advise applicant to refer to Local Policy. It is felt that this issue is beyond the scope of the pro-forma (but is an





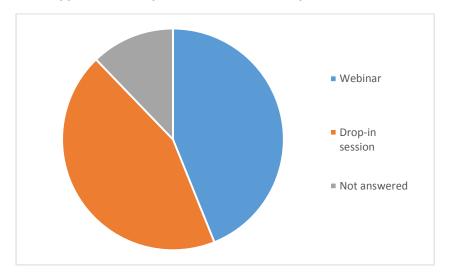
Support for implementation of the pro-forma

The consultation asked several questions about required support and arrangements for successful implementation of the pro-forma. The feedback was as follows.



Q: My organisation may need support in:

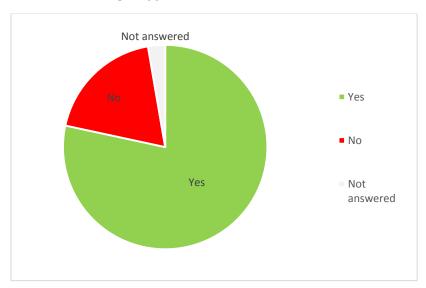
Q: If support could be provided for the above, please indicate what format you would prefer:





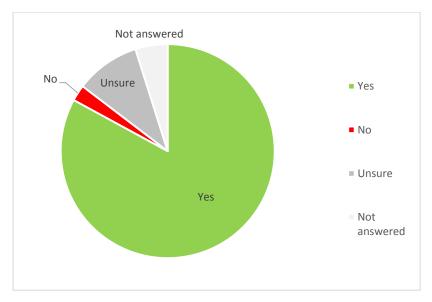


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Q: It is proposed that the current version will be available for download on The Flood Hub. Do you think this is the right approach?

Q: Would a maintenance 'lead' or maintenance 'panel' for the North West be useful in updating the pro-forma in relation to national changes?





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Appendix A – Full list of consultation respondents

North West Local Authorities

Blackpool Council (2 responses)	Online survey
Bolton Council	Online survey
Bury Council	Online survey questions via email
Copeland Borough Council (2 responses)	Online survey plus email
Cumbria County Council	Online survey
Fylde Borough Council	Online survey
Greater Manchester Combined Authority	Online survey plus email
Halton Borough Council	Online survey
Knowsley Borough Council	Online survey questions via email
Manchester City Council	Online survey questions via email
Pendle Borough Council	Online survey
Sefton Borough Council	Online survey
Stockport Metropolitan Borough Council	Online survey
Tameside Metropolitan Borough Council	Online survey
Warrington Borough Council	Online survey
West Lancashire Borough Council (2 responses)	Online survey
Wirral Borough Council	Comments via email
Wyre Borough Council	Online survey

Developers, contractors, consultants and sustainable drainage industry

Genesis Homes	Online survey
Groundwork Greater Manchester - Landscape	Online survey questions via email
Architect	
Innovyze	Comments via email
Lees Roxburgh Ltd	Comments via email
RPS Group	Online survey
RWO Group	Online survey
SDS Limited	Online survey
Seddon Homes Ltd	Online survey
SWF Associates	Online survey
TH Environmental (works for Natural England)	Online survey
WYG Engineering Ltd (2 responses)	Online survey

Other flood risk management authorities

United Utilities (4 responses)	Online survey
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Others

Churchtown Flood Action Group	Comments via email
Highways England (2 responses)	Online survey
North West Regional Flood and Coastal Committee	Online survey
University of Liverpool	Online survey

Local authorities outside of North West

Brighton and Hove City Council	Online survey
Milton Keynes Council	Online survey
Sunderland City Council	Comments via email

One respondent did not specify their organisation name.