



SUDS APPROVAL BODY (SAB)

What is SUDS Approval Body?

The SUDS Approval Body or SAB will be an organisation within County Councils and Unitary Authorities specifically established to deal with the design, approval and adoption of sustainable urban drainage systems (SUDS) within any new development consisting of two or more properties.

What will the SAB be responsible for?

- The SAB will be required to approve drainage systems for managing SUDS before construction begins.
- The SAB will be responsible for producing design guidance documents and approval/adoption procedures.
- The SAB must adopt and maintain approved SUDS that serve more than one property where the SUDS function/structure is built in accordance with the approved detail.
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- The Sewerage Undertakers, Environmental Agencies, Internal Drainage Boards, British Waterways and Highway Authorities will all be statutory consultees to the SAB.

What else is happening?

- The Secretary of state must publish national standards for the design, construction, adoption and maintenance of SUDS.
- The Water Act 1991 is to be amended to make the right to connect surface water runoff into sewers conditional on the drainage system being approved by the SAB.
- The UK must achieve a rating of good for all our watercourses by 2015.

When will the SAB be established?

- The national standards went off for consultation some time ago and received considerable comment. Because of this, along with various other factors, DEFRA has advised that the new

- standards will not become policy until April 2014.
- Six months' notice should be given prior to implementation of the policy.

Please be aware, although the policy will not become mandatory until 2014 County Councils and Planning Authorities are keen to include sustainable drainage within new planning applications. We even know some Councils who are now proving and adopting SUDS on a trial basis to assist in setting up and improving their own internal procedures.

SUDS APPROVALS

How will you apply for SUDS approval?

We understand you can apply for SUDS approval by following two different methods.

- 1 At the same time as the planning application (i.e. a joint application). This means that the application will be made to the LPA who will send the drainage application and fee to the SAB for their approval. The consent will then be issued by the LPA.
- 2 If planning is not required or if the applicant chooses not to lodge a joint application, a freestanding application direct to the SAB can be made and the SAB will grant consent.

What is the assumed SUDS approval procedure at this stage?

- Identify and agree the existing blue corridors (existing overland flow paths), land prone to flooding. Proposed site outfall and any existing physical site constraints with the SAB.
- Calculate and agree pre-development runoff rates with the SAB. These figures will then be used to design the drainage system. The drainage system must be designed to attenuate the 100-year storm event with a 30% increase for climate change.
- Can you produce a detailed design and calculations and submit for SAB approval? This will be based on the early consultations with the SAB. The SAB will then consult the statutory consulters and return any comments.
- The design becomes officially SUDS approved. No development should have started on site until this.
- If you chose to submit the SAB approval separately to the SUDS approval you may now apply for planning consent with the benefit of the site having SUDS consent.

- Construct the SUDS on site to adoptable standards. Various procedures will need to be followed and this will include protecting the newly constructed SUDS from construction traffic during construction of the development.
- Offer SUDS for adoption to the SAB. The SAB will have to adopt the SUDS if they are deemed to be constructed in accordance with the approved details.

Additional Considerations

- Small builder beware, SUDS approval will be required on all developments consisting of two or more properties.
- SFA 7th edition requires any drainage run serving 2 or more properties to be designed and constructed as a public sewer.
- Foundation design will need to reflect private drainage invert levels.
- Adoptable sewers will still require S104 approval. The water authority will require SAB approval for the SUDS before approving sewerage design.
- New roads will require a S38 approval with any SUDS draining public highway to have the benefit of SAB approval.

INDUSTRY CONSIDERATIONS

Potential Issues to the Industry:

- Failure to reach SUDS approval will result in none compliance with the planning consent.
- Existing site constraints could make SUDS unsuitable in some locations. Blue corridors may also cause issues with regards to housing layout planning.
- SUDS must be inspected and constructed to the correct standards to enable adoption.
- Feasibility and ground investigation studies must be carried out as early as possible to determine the SUDS strategy.
- SUDS must be assimilated with public open space requirements to ensure there is no loss of developable land thus compromising housing density requirements.
- It is hoped that a Planning Framework is set up between the LSA, SAB and other stakeholders to ensure competing design interests are reconciled and space is designed in a truly multifunctional form.
- Pre-application discussion is essential.

Potential Benefits to the Industry:

- Sustainability sells. People will pay more for a sustainable product.
 - SUDS can be more cost effective compared to conventional drainage systems.
 - SUDS can be used to make developments more attractive.
- We reduce the risk of flooding and enhance and protect the natural environment.