



Representing Drainage Water Level & Flood Risk Management Authorities

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Consultation:	Draft revised National Planning Policy Framework		
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Draft revised National Planning Policy Framework Response from ADA (Association of Drainage Authorities)

ADA is the membership organisation for drainage, water level and flood risk management authorities throughout the UK. Today ADA represents over 230 members nationally, including internal drainage boards, regional flood & coastal committees, local authorities and national agencies, as well our Associate Members who are contractors, consultants and suppliers to the industry.

Our response focuses on ensuring that provisions for flood risk management and surface water drainage are fully integrated within new development and the planning system in England.

To achieve this it is important that sustainable drainage systems and flood risk management are properly embedded throughout both the NPPF and planning practice guidance to avoid surface water management simply being an afterthought for developers and planning authorities. Surface drainage is an essential public utility and needs to be considered at the earliest opportunity within development.

ADA has only responded to those consultation questions relevant to flood risk and water level management.

Q2 Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

Yes. However the environmental objective should clearly reference reducing flood risk. It is important that sustainable drainage and flood risk management is properly embedded throughout NPPF and planning practice guidance to avoid it simply being an afterthought for developers and planning authorities. Surface drainage is an essential public utility and needs to be considered at the earliest opportunity within development.

Q4 Do you have any other comments on the text of Chapter 2, including the approach to providing additional certainty for neighbourhood plans in some circumstances?

Paragraph 8.c), the environmental objective, should clearly reference reducing flood risk. It is important that sustainable drainage and flood risk management is properly embedded throughout NPPF and planning practice guidance to avoid it simply being an afterthought for developers and



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planning authorities. Surface drainage is an essential public utility and needs to be considered at the earliest opportunity within development.

Q6 Do you have any other comments on the text of Chapter 3?

Paragraph 27 of Maintaining effective cooperation should reference risk management authorities (internal drainage boards, Environment Agency, lead local flood authorities and water companies) as relevant bodies to engage with on strategic plans.

Paragraph 34 on Development contributions should reference surface drainage and flood management as other types of infrastructure for which contributions should be expected in association with particular sites.

Q32 Do you have any comments on the text of Chapter 14? [which covers climate change, flooding and coastal change.]

*It is ADA's view that all development should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. Therefore **'Major' should be omitted from paragraph 163.***

It is essential that the NPPF contains reference to consents from other risk management authorities, and not only lead local flood authorities, which may be required in relation to surface water discharges. Developments that discharge water into a main river may need a flood defence consent from the Environment Agency. Developments that discharge into an internal drainage district will need a land drainage consent from an internal drainage board. Failure to seek and receive consent from other relevant risk management authorities can: hold up development, add cost by requiring systems to be redesigned to meet the specific needs of the system being discharged into, or, in the worst cases result in increased flood risk to communities downstream or the development itself. Therefore, paragraph 163 should be revised to ensure that sustainable drainage systems used **'take account of advice from the lead local flood authority and any other relevant risk management authorities'**.

Adoption of SuDS should become a prerequisite within the NPPF. ADA remains concerned about ensuring the lasting maintenance of sustainable drainage systems for new development. The government needs to develop clear rules around the adoption of SuDS in order to secure the long-term management and maintenance of these features within new development. Adoption and maintenance needs to be financed in a manner that sufficiently values this future cost and enshrines the concept that the "beneficiary pays". In ADA's view **the long-term management of strategic and integrated sustainable drainage systems should be carried out by risk management authorities.** Currently, in the absence of any formal framework SuDS maintenance can fall to a maintenance company, local residents, the local authority or another undertaker. Thus, the maintenance of these systems can fall between the cracks, either because of a lack of responsibility, or because responsibility has been handed over to maintenance companies, which have ceased to operate after just a few years. This leads to "orphan SuDS", which fall into disrepair and don't deliver the intended benefits.

ADA considers that major developments should have to plan for exceedance flows. Designing for exceedance can make the most of shared spaces and create multi-functional infrastructure. Above ground conveyance, flood pathways and flood routing is essential in allowing runoff from extreme rainfall events to drain from developed areas effectively. Recognising the importance of flood

ADA – representing drainage, water level and flood risk management authorities

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pathways along highways and other routes, and the appropriate storage of water, is an important step towards better urban flood management. Designing for exceedance requires different disciplines, people and organisations to work together in partnership, with each being aware of the role that the other plays, and this is another reason why clear rules around adoption and maintenance are needed.

ADA supports the reference to minimum operational standards. However, ADA is concerned that there remains insufficient support for Lead Local Flood Authorities and other risk management authorities in this area. LASOO provides the oversight, maintenance and dissemination of the 'Non-statutory technical standards for sustainable drainage'. This document is key to ensuring consistency in the delivery and management of SuDS and LASOO needs adequate support by Government as a mechanism for the dissemination of information to all relevant risk management and planning authorities on the minimum standards and best practice for sustainable drainage.

Q43 Do you have any comments on the glossary?

The term sustainable drainage system should be defined in the Glossary.