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Non-Statutory Technical Standards for Sustainable Drainage Systems  
and Updates to Planning Practice Guidance

- 2.5 CBC, EA and WSCC, therefore, consider that Policy ENV8, as proposed to be modified, is consistent with the Non-Statutory Technical Standards for SuDS, and is pro-active in supporting the implementation and use of Sustainable Drainage Systems.
3. Updates to Planning Practice Guidance
- 3.1 The updates to Planning Practice Guidance<sup>6</sup> relate predominantly to **PPG: Flood Risk and Climate Change**, specifically paragraphs 45, 51 and 79-86. A further update has been made to paragraph 6 **PPG: Water Supply, Waste Water and Water Quality**.
- 3.2 The updated PPG places clear onus on the delivery of SuDS, with paragraph 79 outlining that **'New development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of Sustainable Drainage Systems'**. This is reflected in the proposed modification to Policy ENV8, which prioritises the implementation and use of SuDS.
- 3.3 Equally, the updated PPG applies focus to the circumstances in which a Sustainable Drainage System should be considered. Paragraph 45 highlights a need for liaison between the Local Planning Authority, Lead Local Flood Authority and Environment Agency in planning for SuDS. This collaborative approach has shaped the overall Policy ENV8 direction, and will continue to be applied through preparation, publication and implementation of the Planning and Climate Change Supplementary Planning Document which will expand upon the Local Plan policy framework.
- 3.4 The amended PPG considers issues relating to the deliverability and viability of SuDS. This is set out under paragraph 79, which is clear that **'...when considering major development, sustainable drainage systems should be provided unless demonstrated to be inappropriate'**. Paragraph 82 expands, outlining that **'The decision on whether a sustainable drainage systems would be inappropriate in relation to a particular development is a matter of judgement for the local planning authority'**.
- 3.5 Policy ENV8 (as proposed to be modified) includes wording to make clear that SuDS will be required unless it can be demonstrated that these are not technically feasible or financially viable. This reflects recognition within the PPG (Flood Risk and Climate Change paragraph 82; Water Supply, Waste Water and Water Quality, paragraph 6) that particular types of SuDS may not be practicable in all locations. Equally, the Policy ENV8 approach as modified is consistent with PPG paragraph 83, which reiterates the need to consider viability when assessing SuDS proposals.
- 3.6 The PPG (paras 82 and 86) recognises that judgement regarding the justification for SuDS should be made having regard to advice from the Lead Local Flood Authority (WSCC) and the Environment Agency. The PPG encourages Local Planning Authorities to agree the circumstances and locations where the advice of Lead Local Flood Authorities should be sought, and set out those local situations where particular SuDS approaches may not be appropriate. This will be addressed by the Planning and Climate Change SPD through continued joint working between CBC, EA, and WSCC.
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- 3.7 On 16 April 2015, DCLG published further updates to Planning Practice Guidance Flood Risk and Coastal Change, paragraphs 32, 43, 47, 49 54, 60, 77 and 79. The amendments take account of the Town and Country Planning (Development Management Procedure) (England) Order 2015, and distinguish between information set out in the Environment Agency Standing Advice and more general situations where EA advice may be helpful. It