

Name: Vicky Boorman Chair Organisation: London Drainage Engineers Group (LODEG) Date of response 31/1/2025.

1. Drainage for surface runoff should be sustainable and affordable to build and maintain. Do the National Standards deliver this? (Yes/No/Unsure)

Yes LODEG would welcome the introduction of National Standards on SuDS to ensure the delivery of all 4 pillars of SuDS as well as emphasising the everyday rainfall and first 5mm. It is a good framework and provides clarity for all on what is acceptable to design and deliver, but the Standards should be shortened and supported by additional detailed guidance such as the Ciria SuDS Manual which can be updated more easily. National standards still leave a gap in understanding cumulative impacts at a catchment scale and off site contributions to works where they cannot meet standards a must.

Language -The word *must* be used instead of *should*, to ensure delivery. Highways should designate locations with special engineering difficulties rather than “may”.

Added Burden. Councils are well placed but this has an implication on local authorities skills and resources and added burdens highlighted in CIWEM work below.

The ultimate measure of sustainability is in ensuring there is maintenance over the long term for which further powers are required to ensure what is proposed is delivered through inspection. The ambiguity will mean variations of specifications.

The maintenance levels must be clear, standard, enforceable and a mechanism for collapse of a PMC. Further powers are required to prevent SuDS being removed over the lifetime of the development. A separate enforcement and maintenance regime, and additional powers provided to local authorities if it is envisaged they are the appropriate adopting authority needed. Provision of verification SuDS should be included as part of this planning process. Appropriate drainage should be an integral part of construction management as well. **The Maintenance and Management Plan** should be formally logged in a public register so that there is transparency and accountability.

Data Collection is critical on the Surface Water Assets installed in a standardised and nationally consistent way in GIS format- for the Flood Assets Register and learning from lessons in Wales highlighting the need for a National Asset register through the expansion of [AIMS](#) to include and for others to input 3rd party data (a project currently paused by the EA). Specification on the need for infrastructure and retrofit to meet these standards.

Proportionality is not mentioned in the current standards – it is noted that this is to be worked out separately. This has a significant implication on workload and feedback on the standards, where there may need to be different thresholds for different standards, and has an implication on affordability. LODEG are keen that community SuDS development is not hindered by the introduction of standards and the added burden of scalability.

Retrofit SuDS are needed to deliver to adapt to climate change on a significant scale as set out in the [London Surface Water Strategy](#) and the [Thames Water DWMP](#) have identified that are needed to adapt to climate change and its impacts also highlighted in the [London Climate Resilience Review](#). We need to maximise opportunities and ensure that these standards apply to large scale retrofit programmes and large scale resurfacing, and amend the replacement like for like, to ensure opportunities for Suds in a dig once approach are taken highlighted in the [SuDS for streetworks programme](#).

Legislation changes. It is not clear how any National Standards would be introduced and made Statutory. If planning **other disciplines** should also adhere to these standards including Highways which were set to be exempt in Schedule 3 and highways works do

Answers to the three questions must not exceed two pages

not go through planning, and updates to the DMRB to ensure appropriate and aligned standards or explanation, as well as changes to other legislation such as the [Water Industry Act](#) to remove the Right to connect. There should be a clearer concession process set out and not too easy to derogate from –on sufficient justification with example. **Technical comments.** Priorities under 'Runoff Destinations' – should include discharge to source control SuDS between priorities 2 and 3. Rain gardens – and basins not in this hierarchy + Table S2.1, treatment train should be emphasised. Soakaway devices should include 'source control SuDS used upstream of soakaway features). Interception required upstream of proprietary treatment. The disposal hierarchy and pumping is very weak.

2. Sustainable surface water drainage systems should mimic natural processes so far as possible. Do you agree the Principles and SuDS Approach support the delivery of this? (Yes/No/Unsure) Please explain why?

Yes in London we have a strong [SuDs Hierarchy in the London Plan](#) which is well used and we want to ensure it is strengthened by National Standards not weakened. . The standards place so much more weight on source control, requirements for biodiversity and amenity and NBS. In principle the standards do tie to the London Plan and its drainage hierarchy. There should be flexibility for London or other cities coming up with Local Standards to be more stringent and have more specific technical guidance. For example the Brownfield relaxation factor would weaken London Plan requirements as would any development where discharge rate is 2 l or below with a 50mm rainfall event as this doesn't comply with the [Ciria SuDS manual](#). Many developments in London achieve less. A clear emphasis needs to be on water quality information and ensuring that all have a clear and simple tool to ensure that it is factored into decision making alongside the upskilling work and resources required to be able to do this.

The Standards contain little on carbon emissions and should consider an embodied carbon assessment, and incorporation of social value and monitoring.

Skills and Resources There is also a wealth of publications from CIWEM on skills and the skills needed to be developed to ensure that those with a responsibility are ready - [Only a third of local authorities have enough staff to manage flash flood risk, experts find - CIWEM](#) and [A Fresh Water Future - CIWEM](#)

3. Do you agree that the draft National Standards reference the most relevant supporting documents, legislation, and guidance? (Yes/No/Unsure)

Please explain why and suggest additional references and/or updates to those provided. The NPPF reference needs to be much stronger throughout as it is only mentioned in one footnote in the document, and there is more recent text supporting SuDS.

There is some additional work carried out on the standards and learnings from Wales - [Sustainable Drainage Systems \(SuDS\) Schedule 3 Post Implementation Review](#) and work done by AECOM to improve these National standards that the advisory group fed into.

There will need to be wider legislation to deliver a whole SuDS process – including enforcement and regulation and commuted sums guidance. If planning legislation is used to bring this in it will need to be clear how this links with Highways and updates to the [Front Garden](#) and [DMRB](#) design, which will all need to align. For example, there will need to be clarity on the power to access and who can do what. Designing for Exceedance and Safe access [ADEPT & EA Flood risk emergency plans for new development September 2019....pdf](#) (this needs updating). The standards will need to provide where the evidence is from to have made decisions. I.e. [HR Wallingford review](#).

Answers to the three questions must not exceed two pages