

Position Statement



Sustainable Drainage Systems (SuDS)

- *Slow The Flow believes that SuDS can help to alleviate flooding.*
- *Slow The Flow advocates the CIRIA SuDS manual.*
- *Local authorities should insist upon SuDS for all developments – new and restoration / retrofit works, of all scales and sizes.*
- *Locally, Calderdale MBC's draft Flood Risk and Drainage Supplementary Planning Guidance, with its support for NFM and SuDS, should be published as soon as possible and enforced strictly.*
- *Nationally, Schedule 3 of the Flood and Water Management Act should be implemented.*
- *The existing ability for water companies to adopt SuDS systems as sewers should be promoted and used widely.*

Slow The Flow believes that Sustainable Drainage Systems (SuDS) can help to alleviate flooding, particularly if widespread across an area. Ideally, SuDS can be targeted to known problem surface water locations, but this should not prevent them from being implemented widely – everywhere is upstream of somewhere.

The drainage network fulfils an essential function in draining our roads and protecting property, but too often existing systems push excess water problems downstream. Many issues in recent events can be laid at the door of Combined Sewer Outfalls (CSOs) that transport both sewage and surface water. Modern sewers exclude surface water, but pre-existing CSOs do exist in all of our towns. Where possible, diverting and slowing down that excess surface water flow might mean the difference between areas flooding and not flooding. More often, whilst it may not prevent flooding entirely, avoiding the overflow of the foul sewer would have a bearing on the quality of the flood water.

Design of the urban realm should take into account the paths of surface water, store it temporarily above ground, and release it more slowly, thus taking pressure off the sewerage system. Natural Flood Management (NFM) is part of this same concept of sustainable drainage. Developers, and the public, are beginning to embrace SuDS and NFM principles, but changing ingrained ways of doing things takes time; Slow The Flow believes that Local Authorities should show leadership through their processes, and insist on high quality SuDS for all development, to encourage a faster and more widespread uptake.

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An opportunity was missed, by the English government, to implement Schedule 3 of the Flood and Water Management Act 2010, which aimed to make SuDS a mandatory part of the planning process for all developments, and deal with their design, adoption and maintenance. Slow The Flow believes that this mistake should be rectified, and that England should follow in Wales' footsteps in promoting SuDS through a top-down approach, by implementing Schedule 3 and establishing SuDS Approval Bodies within Local Authorities.

Recent legislative changes (Sewerage Sector Guidance 2020, Appendix C) have made provision for water companies to designate and adopt some SuDS as sewers, and locally Yorkshire Water have expressed their support. Slow The Flow believes that this should be taken advantage of wherever possible; to encourage greater use of SuDS and alleviate the burden on our local CSOs.

In addition to their flood alleviation contribution, well-designed SuDS can have additional Green Infrastructure (GI) benefits, such as improved biodiversity, amenity, mental and physical health, and air and water quality.

See also 'Planning' and 'Drainage' position statements

Slow The Flow is a charity working to advance the education of the public in Natural Flood Management, Sustainable Drainage Systems and other renewable methods of managing the environment, including the exploration of alternative practices which safeguard the natural environment and its resources in a manner which best fits the specifics of a local geography.

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