

Roundtable Findings: Unlocking SuDS delivery

January 2026



Executive summary

Hugh James convened a roundtable with Welsh Government, local authorities, developers, housing associations, planners, consultants and statutory undertakers to discuss 'Unlocking SuDS delivery.'

The session was designed to bring professionals operating across the housing sector together to evaluate how the statutory Sustainable Drainage (SuDS) regime in Wales has been operating in practice under Schedule 3 of the Flood and Water Management Act 2010.

Overall, participants broadly supported the importance of statutory SuDS. However, there was strong consensus amongst participants that delivery of the regime remains inconsistent, with the processes, costs and delays hindering housing delivery.

Key themes

Throughout the discussion, concerns were expressed about the current regime, such as:

- Inconsistency in interpretation and application of guidance across Sustainable Drainage Approval Bodies (SABs), particularly in relation to commuted sums, discount rates and technical expectations.
- Delays in ascertaining commuted sums and uncertainty over maintenance liabilities, materially impacting viability.
- Misalignment between planning and SuDS processes, including pre-application engagement, timescales and decision-making.
- Capacity and resourcing pressures for SABs, affecting accessibility, responsiveness and continuity.
- A need to improve collaboration, transparency and predictability without weakening the statutory SuDS framework.

Priority recommendations

Participants talked through the issues in great detail, putting forward many ideas to improve the efficiency and viability of SuDS. The suggestions included:

- Developing a nationally agreed framework for calculating commuted sums, including transparent methodologies and agreed assumptions.
- Providing clearer, consolidated statutory guidance with greater certainty on interpretation, supported by practical design standards.
- Strengthening early-stage engagement between planning, SABs and applicants to reduce late-stage redesign and delay.
- Improving transparency of SABs decision-making, including clearer communication of decisions and their underlying rationale.
- Ensuring SABs are adequately resourced, with fee structures aligned to service delivery and skills retention.

Introduction

This white paper is informed by a multidisciplinary roundtable hosted by Hugh James, entitled Unlocking SuDS delivery.

This roundtable was designed to create a structured, cross-sector discussion on the practical delivery of SuDS in Wales and to find practical solutions to the financial, legislative and design barriers.

We brought professionals responsible for setting policy, approving schemes, funding development and delivering housing together, with the aim of drawing upon participants' experience of the statutory regime to find solutions that would improve the process and resolve pain points.

Those in attendance included:

- **Matthew Davies**, Davies Homes Ltd
- **Mark Harris**, The Home Builders Federation
- **Andrew Wilkinson**, Brookbanks
- **Callum Pearce**, Barratt Redrow plc
- **Zoe Aubrey**, Barratt Redrow plc
- **Gary Pillinger**, Codi Group
- **Ben Hartland**, United Welsh Housing Association
- **Rhiannydd Jenkins**, Beacon Cymru Group
- **Lyndon Griffiths**, Tai Hedyn Limited
- **Chris Kinsey**, Monmouthshire Housing Association
- **Leigh Price**, Monmouthshire Housing Association
- **Bernadette Kinsella**, Powell Dobson Architects
- **Jon Hurley**, Asbri Planning
- **Paul Graham**, Vale Consultancy
- **Mark Hand**, RTPi
- **Mark Goodger**, Caerphilly County Borough Council
- **Justin Griffiths**, Neath Port Talbot CBC
- **David James**, Welsh Local Government Association
- **Ian Titherington**, Welsh Government
- **Julian Hill**, Dwr Cymru Welsh Water
- **Miriam Wasik-Evans**, Dwr Cymru Welsh Water

Three topics headlined the discussion.

Financial considerations

Caroline O'Flaherty set the context by noting that SuDS adoption has become a critical path issue for many schemes, influencing land value, funding assumptions and delivery programmes.

From a developer perspective, Matthew Davies described how uncertainty around commuted sums often emerges late in the process, creating disproportionate risk for SME developers and adversely affecting site viability.

Contributing from local authority's viewpoint, Mark Goodger explained the challenge SABs face in balancing whole-life maintenance risk with fairness and transparency, and outlined emerging work through the SAB Society (a new body set up across the Welsh local authorities) to develop shared principles for calculating commuted sums.

Legislative and procedural challenges

Ian Titherington reflected on the intent behind Schedule 3, emphasising that statutory SuDS were designed to address long-standing issues of flood risk, pollution and long-term stewardship.

However, planning professionals highlighted the practical consequences of misalignment between planning and SuDS processes, particularly where approval routes, timescales and escalation mechanisms differ. Housing association representatives elaborated further on the operational impact they face due to inconsistent interpretation between SABs.

Design, performance and long-term effectiveness

Welsh Water representatives outlined concerns about ensuring SuDS genuinely reduce pressure on combined sewers and deliver measurable outcomes over time. Developers and consultants then discussed the tension between technical compliance and practical usability, noting that drainage systems can be over or under engineered risking underperformance.

Across the discussion, there was shared recognition that simpler, robust design approaches, aligned with clear adoption and maintenance arrangements, are more likely to deliver long-term public benefit.

The current landscape

England occupies a markedly different position to Wales in its approach to sustainable drainage. Since 2019, Wales has operated a fully statutory SuDS approval and adoption regime under Schedule 3 of the Flood and Water Management Act 2010, whereas England does not.

In Wales, all qualifying developments must secure approval from a SABs within the local authority before construction can commence. The SAB is responsible not only for approval, but for adoption and long-term maintenance, funded through commuted sums.

By contrast, Schedule 3 has not been implemented in England. SuDS are delivered through planning policy, principally via the National Planning Policy Framework and associated guidance, supported by non-statutory technical standards. Lead Local Flood Authorities are statutory consultees on major development, but they are not approving bodies in the same sense as Welsh SABs. There is no standalone consenting regime, and no automatic public adoption mechanism.

Participants in the roundtable observed that England's model offers flexibility and avoids some of the procedural duplication experienced in Wales. However, it can also create uncertainty around who ultimately owns and maintains infrastructure designed to protect communities from flooding.

Experience in Wales demonstrates both the benefits and the challenges of a statutory regime. The Welsh model has embedded sustainable drainage as essential infrastructure, with clear lines of responsibility. At the same time, it has highlighted the importance of national consistency, transparent commuted sum methodologies and adequate local authority resourcing.

For English stakeholders, the question is not whether to replicate the Welsh model wholesale, but what elements of statutory clarity and accountability could be adapted to strengthen England's system.

The structural differences between England and Wales has significant consequences:

- **Approval routes:** In England, drainage is typically secured through planning conditions. There is no separate statutory approval equivalent to SAB consent.
- **Adoption arrangements:** Adoption may fall to a local authority, a water company, a highway authority or a private management company. In many cases, long-term maintenance rests with residents through estate management arrangements.
- **Consistency:** While national planning policy sets expectations, detailed interpretation varies between local authorities and LLFAs.
- **Enforceability and stewardship:** Without a statutory adoption framework, long-term oversight and funding arrangements can be fragmented.

Key themes

The roundtable discussion revealed an unanimous alignment on the challenges facing SuDS delivery, even where perspectives differed on the causes and possible solutions.

Financial considerations and commuted sums

Participants described commuted sums as one of the most significant sources of risk and uncertainty. While there was broad acceptance that maintenance must be properly funded over the long term, the absence of a consistent methodology has led to wide variation in outcomes. Discussions considered use of estate service charges, a form of council tax sinking funds or an additional charge from Welsh Water.

Developers and housing associations described difficulties in pricing land and securing funding where commuted sums are confirmed late or calculated using opaque assumptions. SuDS Approval Bodies, in turn, emphasised their responsibility to protect public finances and future generations, particularly where systems may require replacement decades into the future. The emergence of the SAB Society was widely welcomed as a practical step towards shared principles and greater transparency.

“Every authority is different in how it operates. What we try to do as a SAB Society is to unify that and achieve consistency across the board. We are here to work with you pragmatically.”

Justin Griffiths
SAB & Highway Development Control
Manager
Neath Port Talbot CBC



Governance, consistency and process

Governance and process issues consistently highlighted misalignment between planning and SuDS regimes, particularly at pre-application stage. While early engagement was recognised as critical, there was frustration at the lack of statutory structure around SuDS pre-application advice, leading to variable service levels and expectations.

Changes in requirements following internal review or staff turnover were cited as particularly disruptive. There was strong consensus that clearer guidance, better internal coordination within authorities and improved communication would reduce delay without undermining regulatory objectives.

Design, maintenance and long-term performance

Design quality and long-term performance formed the third major theme. Discussion focused on whether systems are consistently delivering their intended benefits once built. Complex designs, fragmented maintenance responsibilities and reliance on private plot owners were all identified as risk factors. Participants stressed the importance of designing for usability and maintainability, not just technical compliance.

Welsh Water highlighted the need for SuDS to demonstrably reduce pressure on combined sewers and improve water quality, reinforcing the importance of robust design and clear accountability.

Across all themes, the discussion returned repeatedly to the same underlying issues: consistency, clarity and capacity. While perspectives differed, there was little disagreement that these factors, rather than the principle of statutory SuDS itself, are the primary barriers to effective delivery.

Recommendations

The recommendations below are grounded in the discussion and reflect actions that participants considered both realistic and impactful. They are intended to improve delivery without weakening the statutory framework.

For policy makers

Participants emphasised the need for clearer direction and support to enable consistent application of the regime across Wales, while retaining appropriate local discretion. Some of the recommended actions included:

- Consolidating and updating statutory guidance into a single, clear document with stronger direction on interpretation and application.
- Supporting the development of nationally agreed principles for commuted sums, including transparency on assumptions and discount rates.
- Reviewing whether additional powers or mechanisms are required to support resolution where agreement cannot be reached.
- Investing in skills and training and increasing resource to support consistent SAB decision-making across local authorities.

For housing developers and planners

The key recommendations made by local authority representatives to developers and planners included:

- Engaging with SuDS Approval Bodies at the earliest possible stage – focusing on drainage hierarchy and viability before layouts are fixed.
- Providing proportionate, evidence-based maintenance proposals to support informed discussions on commuted sums.
- Sharing data and learning through industry bodies to support benchmarking and improved consistency.

For housing associations

The recommendations for housing association representatives were as follows:

- Considering stewardship and maintenance implications early, particularly where adoption or management company arrangements are proposed.
- Seeking clarity on evidence, monitoring and reporting expectations during maintenance periods.
- Working collaboratively with local authorities to align affordable housing delivery with SuDS requirements.



Conclusion

The roundtable demonstrated strong cross-sector support in Wales for the principles underpinning sustainable drainage. However, it also highlighted structural differences between England and Wales that materially affect delivery and long-term outcomes.

Wales has embedded SuDS as statutory infrastructure, with mandatory approval and public adoption providing clarity of responsibility. England has prioritised flexibility through planning policy.

The key lesson for England is not that statutory regulation is without challenge. Welsh experience shows that consistency, transparency in calculating commuted sums and adequate resourcing are essential to make such a regime function effectively. It also demonstrates how important clear accountability and defined approval gateways are.

For all local authorities, planners and developers, several insights stand out:

- Early, structured engagement reduces late-stage redesign and viability risk.
- Nationally consistent methodologies improve predictability and confidence.
- Clear adoption routes strengthen long-term public trust in new development.
- Drainage infrastructure should be treated as essential, not ancillary, to placemaking and resilience.

As flood risk intensifies and environmental expectations rise, England may increasingly need to consider whether its current planning-led framework is sufficient to deliver durable, maintainable and publicly accountable SuDS.

The Welsh statutory regime provides a live case study. Its implementation has not been without difficulty, but it offers practical insight into how clearer lines of responsibility, mandatory approval and embedded stewardship can reshape drainage delivery.

The question for England is how to translate those lessons into a model that balances flexibility with certainty, viability with public protection, and innovation with long-term accountability.

Final thoughts

The recent setting up of the SAB society is a welcome recognition of the need for consistency pan Wales. The overriding theme was the need for clarity in terms of design requirements, commuted sums and statutory interpretation and a joining up of planning and SAB processes to ensure effective housing delivery within a sustainable drainage framework.

The roundtable was a valuable forum for hearing different viewpoints. The conclusion is that change is needed and stakeholders are clear as to what tangible steps need to be adopted to elicit that change.



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"Planning seems to be a lot more transparent than SAB processes. You've got portals, you've got decision notices. Anybody buying that property can do their own investigation without using a solicitor. I find that the SAB process seems quite cloak and dagger where decisions are made behind a computer."

Miriam Wasik-Evans
Development Planning Manager
Dwr Cymru



