

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

Wales occupies a distinct position within the UK in its approach to sustainable drainage. Since 2019, Schedule 3 of the Flood and Water Management Act 2010 has established a statutory requirement for SuDS approval and adoption, making Wales the only UK nation where SuDS are subject to a standalone consenting regime administered by SuDS Approval Bodies within local authorities.

The intention behind this approach was clear. Historic reliance on conventional drainage had contributed to increased flood risk, water pollution and long-term maintenance liabilities. Schedule 3 was designed to embed sustainable drainage as essential infrastructure, ensuring that surface water is managed as close to source as possible, systems are designed for long-term performance, and responsibilities for adoption and maintenance are clearly defined from the outset.

In contrast, England continues to operate a non-statutory SuDS regime, where delivery relies primarily on planning policy and guidance. Participants noted that while this offers greater flexibility, it has also resulted in inconsistent outcomes and weaker long-term stewardship. Wales's statutory framework was intended to avoid these pitfalls by providing certainty, consistency and enforceability.

At the same time, local authorities face acute capacity and resourcing pressures. SuDS Approval Bodies are expected to exercise detailed technical scrutiny, manage long-term risk and engage with applicants, often with limited staffing and legacy fee structures based on pre-2019 assumptions. For developers and housing associations, this has translated into uncertainty around timescales, costs and design expectations.

These challenges do not undermine the policy intent behind statutory SuDS, but they do explain why delivery has become uneven. It was against this backdrop that Hugh James convened the roundtable, bringing together policymakers, regulators, developers and operators to identify shared pain points and explore where greater clarity, consistency and collaboration could unlock better outcomes across the sector.

However, experience since implementation has highlighted a number of structural challenges:

- Guidance has evolved incrementally and is spread across multiple documents, leading to varied interpretation.
- There is no direct equivalent to requisition rights or appeal mechanisms found in other infrastructure regimes, limiting options where agreement cannot be reached.
- Planning consent and SuDS approval operate on parallel but distinct processes, increasing programme risk where early coordination does not occur.

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 reinforced strong cross-sector support for the principles underpinning statutory SuDS in Wales. Participants were clear in the discussion that the objective now should be to improve delivery, not to dilute standards. The challenges identified throughout, were practical solutions to improve processes rather than ideological changes.

One of the key takeaways from the roundtable was the need for greater consistency in interpretation from SABs across Wales, as well as improved transparency around cost and decision-making. Local authorities also recommended earlier and more structured engagement by property planners and developers.

Developers and housing associations emphasised the impact of uncertainty on viability and programme delivery, while local authority and Welsh Government representatives highlighted the importance of safeguarding long-term public benefit and environmental outcomes.

Several participants reflected on the need to move beyond parallel working. While innovation and learning are happening across the sector, there was a shared view that progress would accelerate if experience, data and best practice were more systematically shared, particularly through mechanisms such as the SAB Society.



“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



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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