

Strategic Planning Westfields
C/O Municipal Buildings
Earle Street
Crewe
CW1 2BJ



SENT BY EMAIL
planningpolicy@cheshireeast.gov.uk
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Dear Planning Policy Team,

CHESHIRE EAST SUSTAINABLE DRAINAGE SYSTEM DESIGN GUIDANCE

1. Thank you for consulting with the Home Builders Federation (HBF) on the Sustainable Drainage System design guidance for Cheshire East.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The HBF understands that the Sustainable Drainage Systems (SuDS) Supplementary planning document (SPD) is to be used alongside the Local Plan in order to make decision on planning applications. Our members recognise the need to provide appropriate drainage systems to support new development. However, whilst we recognise the need for such systems it is important that they are not only in line with national policy and guidance but also introduced in a manner that will not jeopardise the delivery of homes.
4. A number of HBF members have raised concerns with us in relation to this SPD, and the practicality of implementing its requirements. The HBF would strongly recommend that the Council seek to further engage with the home building industry before seeking to implement this SPD and its contents.
5. The HBF notes that much of SPD has been based on the content of the SuDs Manual C753, and consider that as such much of the content of this SPD is not necessary, as this document is available to all and could instead be referred to. There are, however, some areas where the SPD differs from the manual and some of these areas are of concern to our members and are likely to have implications for the deliverability and viability of development in the area.
6. The HBF notes for example that the maximum slopes to swales and basins have been set at 1 in 4 rather than 1 in 3. This is likely to impact on the land take within development and will therefore have implications for the viability of development and will not have been considered as part of the local plan viability assessment. The increased



land take will also potentially impact on the deliverability of development, the density of development and the effective use of land, which may cause conflicts with other elements of planning policy.

7. Table 4.3 of The SuDS Manual C753 sets out the minimum water quality management requirements for discharges to receiving surface waters and groundwaters. It does not appear that this is appropriately reflected in the SPD which appears to set higher levels of expectation without any rationale or consideration of the more onerous implications and potential impacts on viability.
8. It should be noted that PPG¹ states that *'Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.'*
9. The HBF has concerns in relation to the SPD particularly in relation to the additional financial burden this would create for developers. The HBF would strongly recommend that the Council undertake a full viability assessment of this proposed amendment to ensure that it is viable and that it does not impact on the delivery of homes. The NPPF² establishes the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.
10. The HBF notes that United Utilities are acknowledged as having been involved with the preparation of this SPD, however, some of the elements of detail in the document do not appear to be in line with guidance that have been given to our members by United Utilities, particularly in relation basins and ponds and the Sewerage Sector Guidance. The HBF recommends that the Council undertake further engagement with both United Utilities and the home building industry, to ensure that these differences are addressed and that schemes can be adopted.
11. The HBF would also be keen to know what level of engagement has been undertaken with the Council's highways teams to ensure that the measures proposed as part of the SPD are considered to be appropriate by the highways teams and will not lead to further delays in the consideration of any applications.
12. The HBF considers that in order to ensure that SuDs are considered appropriately early on in the design process, there will be a need for appropriate skills and expertise to be available to applicants as part of the pre-application and early planning application stages. The HBF seeks assurance that there will be suitably detailed expert advice available at the pre-application advice stage and early in the consideration of any planning applications.

¹ ID: 61-008-20190315

² NPPF (2021) Paragraph 34

13. The HBF recommends that once the Council has undertaken further engagement around the practicalities of implementing this SPD with the home building industry, and further considered the viability implications of this SPD, and ensured that the SPD is appropriately flexible to cater for the differing site specifics, that the Council should ensure that an appropriate transitional period is provided before this SPD is implemented.

Future Engagement

14. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
15. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



Joanne Harding
Planning Manager – Local Plan (North)
Email: joanne.harding@hbf.co.uk
Phone: 07972 774 229