

From: Philip Forster
Sent: 09 October 2018 13:52
To: planning_admin
Subject: FW: P/2018/0674

[Flood officer response](#)

From: Philip Forster
Sent: 11 September 2018 10:13
To: planning_admin
Subject: FW: P/2018/0674

[Flood officer response](#)

From: Neil Taunt
Sent: 10 September 2018 11:50
To: Philip Forster
Subject: P/2018/0674

Hi Phil,

Thanks you for the recent consultation on the above application.

The site is identified as falling with DAM Zone A as defined within TAN15, there are also localised areas identified as being at risk of surface water flooding as defined on NRW's updated flood map for surface water.

I have reviewed the submitted Flood Consequence Assessment and Drainage Strategy and would request that additional information is submitted prior to the application being approved.

The outline drainage strategy indicates that surface waters will be managed by infiltration, but if this is not feasible due to local ground conditions then an attenuated discharge to a remote watercourse will be used. The strategy also suggests that due to the undulating nature of the site then pumping will be required. No connection to any existing surface water sewer is possible from the site.

I have significant concerns over the sustainability of the proposed scheme if it will be reliant on pumping to deliver a suitable solution. In addition it has not been demonstrated either that soakaway is a viable means of disposal for the site or that a connection to the remote watercourse through the neighbouring estate can be realised. The site would appear an ideal candidate for a more SuDS based solution to manage surface waters generated on site in accordance with the latest National Standards for Wales, but the intention appears to be for an underground based surface water management based solution. Prior to determination additional information should be submitted to demonstrate that there is a sustainable solution to surface water management on the site. The attached guidance note details the minimum requirements of an indicative drainage proposal that should be submitted to demonstrate that there is a viable solution – this must include confirmation that infiltration is viable (any percolation tests carried out in accordance with the latest BRE365 guidance).and if not that a route to the remote watercourse can be secured.

In the absence of this information it has not been demonstrated that surface water flood risk both to the development site and surrounding area can be sustainably managed into the future and I would request the application be refused.

In addition, the applicant should be made aware that the commencement of schedule 3 of the Flood and Water Management Act 2010 (the Act) was signed 1 May 2018. This will mean that from the 7 January 2019 any new

development that satisfy the criteria will require SuDS Approval Body (SAB) approval prior to the commencement of development. It is proposed to make transitional arrangements as follows:

- Existing sites and developments with planning permission granted or deemed to be granted (whether or not subject to any conditions as to a reserved matter – but see also below) or for which a valid application has been received but not determined by 7 January 2019, will not be required to apply for SAB approval.
- SAB approval will still be required if the planning permission was granted subject to a condition as to a reserved matter and an application for approval of the reserved matter is not made before 7 January 2020.

It is reasonable to assume that, if the development were to progress, and any associated drainage conditions not be discharged prior to the January 2020 date, then SAB approval would be required prior to the commencement of any works on site.

If you have any question on the above please let me know.

Many thanks

Neil

Neil Taunt MCIWEM C.WEM CEnv CSci

Uwch Swyddog Rheoli Llifogydd / Senior Flood Management Officer



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