Clare Whiting

From: Philip Forster
Sent: 11 October 2018 19:57
To: planning_admin
Subject: FW: P/2018/0671

Flood officer response

From: Neil Taunt
Sent: 11 October 2018 11:17
To: Philip Forster
Subject: P/2018/0671

Hi Phil,

Thanks you for the recent consultation on the above application.

The site is located with DAM Zone A as defined within TAN15. There are a number of localised areas identified as being at risk of surface water flooding on NRWs updated flood map for surface water.

A Flood Consequence Assessment and Drainage Strategy report has been submitted in support of the application. This report identifies the risk of surface water flooding to elements of the proposed re development and suggests these risks will be managed by an improved drainage system on site. No additional detail is given.

With regards to the management of surface water from the development, the Drainage Strategy gives a high level summary of what SuDS techniques may be suitable for the proposed development but does not provide further detail. It would appear the intention is to discharge surface waters generated by the site the public surface water sewer. I would strongly advocate that alternative means of managing and disposing of surface waters are fully investigated and discounted prior to discharge to the surface water sewer to reduce pressure on the existing sewer and surface water networks. WW/DC as sewerage undertaker would ultimately need to approve any discharge to this surface water sewer.

If permission were to be granted I would request the following pre commencement condition be included to ensure appropriate consideration is given to all sustainable drainage options prior to discharge to the public sewer. This assessment should show compliance to the National Standards for SuDs as prescribed by the Welsh ministers, and give particular consideration to managing the residual risks associated with surface water flooding and exceedance flows to ensure the identified risks to the site are adequately managed.

ZH11 (PRE-COMMENCEMENT) COMPREHENSIVE DRAINAGE (SuDS)
114R No part of the development shall commence until a scheme for the comprehensive and integrated drainage of the site indicating provision for foul water, surface water and land drainage has been submitted to and approved in writing by the Local Planning Authority. Prior to the submission of those details, an assessment shall be carried out into the potential for disposing of surface water by means of Sustainable urban Drainage Systems (SuDS) in accordance with the principles of sustainable drainage systems set out in Technical Advice Note 15: Development and Flood Risk, and demonstrating compliance with the Sustainable Drainage Systems Standards for Wales. The results of the assessment shall be submitted in writing to the Local Planning Authority. Where a SuDS scheme is to be implemented, the submitted details shall:

i) Provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of receiving ground water and/or surface waters;
ii) Specify the responsibilities of each party for the implementation of the SuDS scheme, together with a timetable for that implementation; and,

iii) Provide a timescale for implementation, management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

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 Approving 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

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Uwch Swyddog Rheoli Llifogydd / Senior Flood Management Officer

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