

**Cerys Jones**

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**From:** Jason Russell  
**Sent:** 13 October 2020 10:21  
**To:** Cerys Jones  
**Subject:** CONSULTATION - GENERAL LETTER - App ref P/2020/0599

Hi Cerys,

Thank you for the recent consultation on the above application for outline permission.

**CODI ADEILAD AR GYFER DEUNYDDIAU CRAI A PHEIRIANNAU CYSYLLTIEDIG / ERECTION OF BUILDING FOR RAW MATERIALS AND ASSOCIATED PLANT LLOYDS ANIMAL FEEDS BRIDGE ROAD NORTH WREXHAM INDUSTRIAL ESTATE WREXHAM**

The site is located in DAM Zone A as defined within TAN15. There are a number of localised areas at risk of surface water flooding on the site as depicted on NRW surface water flood risk map.

**SuDS Approving Body Approval Requirement**

As you will be aware, from the 7th of January 2019 any new development of more than one dwelling or that involves construction work of more than 100m2 is required to obtain approval from the SuDS Approving Body (SAB) prior to the commencement of those construction works. No formal application for SAB approval or request for pre application SAB advice has been received to date. In the absence of the full consideration of the requirements of the National Standards for SuDS, and requirements of Schedule 3 of the Flood and Water Management Act, it has not been demonstrated that a compliant sustainable surface water management scheme can be delivered for the site. It is likely that this requirement will have implications for the proposed development, particularly in relation to the layout. In some instances it may not be possible to identify a scheme that can successfully comply with the national standards, particularly if future maintenance, management and funding of a scheme cannot be agreed with the SAB as adopting authority.

Prior to the determination of the outline application, it must be clearly demonstrated that a Sustainable Drainage Scheme, compliant with the Welsh Ministers Statutory Standards for Wales, can be delivered for the site. This SuDS Strategy document (or equivalent) must detail the proposed approach to achieve compliance with the Statutory Standards, whilst demonstrating how the guiding principles of the standards will be achieved. While it is possible to seek planning permission in isolation of seeking SAB approval, there is a significant risk in pursuing such an approach. The earlier it can be determined that the proposals are compliant with the new standards the less chance of delay, wasted effort and costs for all parties involved.

Should this application be approved I would recommend the inclusion of a pre-commencement condition requesting detail of the final surface water management scheme for the site as well as the Note to Applicant below detailing the need to obtain SAB approval prior to the commencement of any construction works on site.

**Note to Applicant – SAB Approval Required**

Following the commencement of Schedule 3 of the Flood and Water Management Act, the works as proposed are required to obtain approval from the SuDS Approving Body (SAB) prior to commencement of those construction works. Further details of the SAB, the new national standards, the pre-application advice service and the application for approval process can be found on the Wrexham CBC's SAB webpage:

[https://www.wrexham.gov.uk/english/planning\\_portal/sab/sab.htm](https://www.wrexham.gov.uk/english/planning_portal/sab/sab.htm) or by contacting the SAB Team directly at [SAB@wrexham.gov.uk](mailto:SAB@wrexham.gov.uk).

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

Kind regards  
Jason Russell  
Peiriannydd / Engineer



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