

Cerys Jones

From: Philip Forster
Sent: 21 October 2019 10:58
To: planning_admin
Subject: FW: P/2019/0354

Flood officer response

From: Neil Taunt
Sent: 24 September 2019 12:54
To: Philip Forster
Cc: Kevin Edwards; Peter Douthwaite
Subject: RE: P/2019/0354

Hi Phil,

Following the submission of additional information regarding the proposed means of drainage of the development site, I am now able to provide amended comments.

To ensure a sustainable means of managing surface water generated by new impermeable surfaces associated with the development, the applicant is reliant upon a connection into the local highway drainage network to manage both private and highway runoff.

Additional investigation detail in relation to the highway drain have highlighted a number of significant defects that must be resolved prior the Highways Authority accepting any formal connection for surface water drainage from the development site. I would request that an appropriately worded condition be included to secure the delivery of these enabling work, undertaken at the applicants expense, must:

- Be agreed prior to commencement of works on site with the Highways Authority.
- Be completed to the satisfaction of the Highways Authority (CCTV survey post remedial works required) prior to any connection being made into the existing or improved highway drain.
- Include all defects identified and agreed with the Highways Authority from the proposed point of connection downstream to the recently constructed surface water sewer (proposed for future adoption by DCWW) located with the highway infrastructure to the north of the Enterprise Centre.

If this can not be achieved then no connection to the highway drainage infrastructure would be permitted and I would have no option but to request the application be refused as no other means to manage surface water, and associated flood risk away from the site, has been identified.

With regards to the proposed means of surface water drainage from the site, sufficient information has been submitted to demonstrate a scheme compliant with the Nation standards can be achieved, the detail of which will be required with any future application for SAB approval. I would request the following not to applicant be included if permission were to be granted:

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 or by contacting the SAB Team directly at SAB@wrexham.gov.uk .

If you have any question on the above please do not hesitate to contact me.

Many thanks

Neil

From: Neil Taunt
Sent: 10 June 2019 09:13
To: Philip Forster
Subject: P/2019/0354

Hi Phil,

Thank you for the recent consultation on the above application.

The site is located in DAM Zone A as defined within TAN15. NRW's surface water flood map identifies areas adjacent to the site at a high risk of surface water flooding.

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. We have been approached to provide Pre application SAB advice for the proposed development and am awaiting receipt of revised plans that would demonstrate a scheme, compliant with the principles and standards that are contained within the Welsh Ministers Standards, can be delivered for the site. It is possible 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.

There are significant and fundamental concerns regarding the proposed means of surface water management for the site. Initial proposals suggested a portion of the site could be managed using soakaway, but a number of properties (6) and areas of highway are proposed to discharge at an attenuated rate to an adjacent highway drain in Blast Road. Information submitted in support of this highlighted significant defects with this system that are likely to preclude its use. Alternative options included using pumped systems to manage surface water for the portion of the site that cannot be managed by infiltration. This may be contrary to the underpinning principles of the Welsh Ministers Statutory SuDS Standards.

Prior to the determination of the application, I would strongly advise the applicant provide sufficient information to demonstrate a compliant scheme can be achieved for the site. In the absence of this information it has not been demonstrated that surface waters generated by the development can be managed without flooding detriment and would request the application be refused.

While it is possible to obtain 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.

If you have any questions 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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Wrexham County Borough Council, Environment & Technical Department, Abbey Road South, Wrexham Industrial Estate, Wrexham LL13 9PW



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