

**AnnS Jones**

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**From:** Mared Rees-Jones  
**Sent:** 16 January 2020 15:35  
**To:** planning\_admin  
**Subject:** FW: P/2019/0944

Please add drainage response to file

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**From:** Neil Taunt  
**Sent:** 15 January 2020 14:17  
**To:** Mared Rees-Jones  
**Subject:** P/2019/0944

Hi Mared,

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

The site is located in DAM Zone A as defined within TAN15.

**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 100m<sup>2</sup> 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.

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).

The information submitted with the application indicates a soakaway and SuDS will be used to drain the site but no supporting information is provided to indicate this is viable. Review of available British Geological Survey datasets would indicate local superficial deposits of glacial till which can have very variable infiltration properties. As such it may be that infiltration is not viable at this location. Prior to determination of the application I would request that a SuDS strategy be submitted. In the absence of this information it has not been demonstrated that the development as proposed could proceed without a detrimental impact on surface water flood risk locally.

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

Many thanks

**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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