

AnnS Jones

From: Marek Rees-Jones
Sent: 15 August 2019 09:57
To: planning_admin
Subject: FW: P/2019/0546
Attachments: Brymbo Park Pre App Consultation Response

[Please add consultation response to file](#)

From: Neil Taunt
Sent: 15 August 2019 09:42
To: Marek Rees-Jones
Subject: P/2019/0546

Hi Marek,

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

For your convenience I have attached my recent response to the pre application consultation undertaken for this application site. Within this I have raised a number of concerns regarding the proposed drainage strategy and did recommend that the document be reviewed prior to making an application to give consideration to the Statutory SuDS standards for Wales.

The majority of the site is identified as falling within DAM Zone A as defined within TAN15. A number of areas of the site are identified as being at risk of surface water flooding as detailed on NRW's flood map for surface water. This includes an area of high risk that would appear to be associated with an overland flow route that originates near Blast road to the NW boundary of the site but would appear to be conveyed across areas of the site identified for development. This identified conveyance route should be fully investigated and mitigated to ensure no adverse impact either to future users of the site or to the surrounding area, or be excluded from the proposed developable area of the site.

SuDS Approving Body Approval Requirement

I have reviewed the submitted information with particular reference to the proposed surface water management strategy for the site. As this application was validated after the 7th January 2019 the requirements of Schedule 3 of the Flood and Water Management Act apply.

For large phased developments which could have sites with multiple build stages involving multiple developers, the SAB, LPA and developers should establish an agreed overall strategic approach to sustainable drainage design. This should involve agreeing strategic drainage principles for the development and likely build phases, which are consistent with the Statutory SuDS Standards, principles and relevant local policies. This is needed to avoid potential problems and inconsistencies of delivering drainage solutions, which could lead to an increased flood risk or the inability to deliver compliant sustainable drainage systems and cause undue delay in the construction of later build phases.

Therefore, 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 needs to consider, and be acceptable too, the SuDS Approving Body who may be duty bound adopt any scheme built in accordance with SAB approval.

Any SuDS Strategy document must detail the proposed approach to achieve compliance with the Statutory Standards, whilst demonstrating how the guiding principles of the standards will be achieved. This document will need to consider how the SuDS scheme will be delivered for the site, particularly if phasing of any development is likely. Proposals for how the future management, maintenance and funding of the scheme will be secured to ensure

its function over the lifetime of the development will also need to be given consideration. It is essential that due consideration is given to the sustainable drainage of the site at the outline application stage to ensure the maximum benefits of Sustainable Drainage can be achieved and a high quality, compliant scheme can be brought forward that will satisfy SAB and wider planning considerations. This should include consideration of relevant stakeholder concerns for the site.

The submitted FCA and Drainage Strategy (that does not appear to have been revised following my comments provided at the Pre Application Consultation stage) does propose an outline scheme to manage surface waters generated by the proposed development but does not fully consider the now Statutory SuDS Standards and underpinning design principles. Elements of the proposed strategy, including proposed discharge rates, are contrary to the National Standards and are unlikely to achieve SAB support or approval.

In the absence of this information it has not been demonstrated that a SuDS scheme compliant with the Statutory Standards can be delivered for the site and I would request this information is requested as a matter of urgency. This may have significant implications for the deliverability of the site if any future application for SAB approval were not successful.

If you have any question on the above or wish to discuss further please let me know.

Many thanks

Neil

Neil Taunt MCIWEM C.WEM CEnv CSci

Uwch Swyddog Rheoli Llifogydd / Senior Flood Management Officer



☎ 01978 729734 / 07808 787632

✉ Cyngor Bwrdeistref Sirol Wrecsam, Adran Amgylchedd a Thechnegol, De Ffordd yr Abaty, Ystad Ddiwydiannol Wrecsam, Wrecsam LL13 9PW

✉ Wrexham County Borough Council, Environment & Technical Department, Abbey Road South, Wrexham Industrial Estate, Wrexham LL13 9PW

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