

Karen Thorley

From: Karen Thorley
Sent: 18 April 2019 14:07
To: 'Adam Caldwell'; Tom Dove
Cc: Bryn Roberts; Ben Embrey; James Smith
Subject: FW: Proposed development at Blast Road, Brymbo, Wrexham, LL11 5BB

SAB response from Neil Taunt

From: SAB <SAB@wrexham.gov.uk>
Sent: 01 April 2019 15:00
To: Info <info@brenigconstruction.co.uk>
Cc: SAB <SAB@wrexham.gov.uk>
Subject: Proposed development at Blast Road, Brymbo, Wrexham, LL11 5BB

Thank you for the recent pre-application consultation on the above site.

I have reviewed the information provided in respect of surface water drainage and compliance with the now mandatory Welsh Ministers Standards for Sustainable Drainage Systems and have a number of concerns in relation to the proposed scheme. I would strongly advise that these concerns are given full consideration prior to the submission of any planning application for the site as they may have implications for site layout etc..

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. Furthermore the surface water drainage systems serving proposals of greater than one property will be subject to adoption by the SAB and must be constructed in such a manner as to be compliant with new national statutory standards. Given the potential implications for your development, in particular it's layout, it is essential that you can demonstrate that the surface water drainage arrangements will be compliant with the national standards. While it is possible to seek planning permission in isolation of seeking SAB approval we emphasise the risk in pursuing such an approach. The earlier it can be determined that your proposals are compliant with the new standards the less chance of delay, wasted effort and costs for all parties involved.

The Welsh Ministers Statutory Standards clearly define the principles and standards that should be demonstrated on all new development within Wales. The submitted drainage strategy does not address how the principles or standards will be complied with within the proposed development.

The scheme as proposed does give rise to a number of concerns that would need to be given further consideration including, but not limited to:

- 1) Discharge to Highway Drain:
In areas of the site where infiltration drainage is not achievable it is proposed to discharge to an adjacent highway drain. There is no evidence to suggest this can be achieved without detriment to the existing highway drainage system, and no supporting confirmation from the highway authority that this option would be acceptable to them.
- 2) Discharge Rate:
It is proposed to discharge at a rate of 5 l/s into the adjacent highway drain. Notwithstanding the comments in 1) above, any discharge rate should better reflect the equivalent greenfield runoff rate.
- 3) Attenuation within the adoptable highway:
It would appear that significant attenuation structures are proposed beneath the adoptable highway (plots 1 to 6 and 12 to 18). There is no evidence provided to suggest that this would be acceptable to the highway authority. Historically this has not been acceptable

- 4) Shared soakaway provision within the curtilage of private properties:
Any proposed scheme must be manageable and maintainable over its lifetime. The SAB is unlikely to want to adopt systems that have restricted access to SuDS features, or that are likely to introduce future issues in relation to householder development.
- 5) Water Quality:
No consideration has been given to how SuDS features can contribute to the delivery of Standard 3.
- 6) Amenity and Biodiversity:
No consideration has been given to Standards 4 and 5.
- 7) Operation, management and integrity:
No consideration has been given to Standard 6. It is essential that any proposed scheme is sustainable across its lifetime. This needs full understanding of management and maintenance activities and any costs associated with adoption of the proposed scheme.

The information provided is not sufficient to demonstrate a scheme compliant with the National Standards can be delivered for the site. The proposed scheme should be fully reviewed giving full consideration to the guiding principles and standards within the statutory guidance, and ensure supporting evidence is provided to demonstrate that any proposed scheme can be delivered. I would strongly recommend discussions with the SAB prior to submitting any application for detailed planning permission as it may be that alterations to site layout are required. 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.

If you wish to discuss any element of the above further please do not hesitate to contact the undersigned.

Regards

Neil Taunt MCIWEM C.WEM CEnv CSci

Uwch Swyddog Rheoli Llifogydd / Senior Flood Management Officer



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

Environment & Planning, Wrexham County Borough Council, Abbey Road South, Wrexham Industrial Estate, Wrexham LL13 9PW

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