

Cerys Jones

From: Sharon Holman
Sent: 06 January 2020 08:09
To: planning_admin
Subject: FW: P/2019/0919

Civ – flood officer resp

From: Neil Taunt <Neil.Taunt@wrexham.gov.uk>
Sent: 27 December 2019 09:55
To: Sharon Holman <Sharon.Holman@wrexham.gov.uk>
Subject: P/2019/0919

Hi Sharon,

Thank you for the recent consultation on the above application.

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 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 application, and as a matter of urgency, I would strongly advise the applicant give full consideration to the implications that compliance to the National SuDS standards may have for the development and revise proposals accordingly whilst also pursuing SAB approval. 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.

The drainage strategy information submitted with the application appears to have been compiled without reference or knowledge of the Welsh Ministers Statutory Standards for SuDS. It proposes a traditional soakaway scheme that would appear contrary to the underpinning design principles included within the Welsh Ministers Statutory Standards. In addition, no attempt has been made to demonstrate compliance with a number of the statutory standards, including those relating to Amenity and Biodiversity, which I would consider to be a significant opportunity missed. Falling head infiltration testing has been undertaken which demonstrates infiltration may be suitable on the site, but indicates does highlight the need for additional testing carried out in accordance with BRE365 to inform any future scheme.

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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