

Cerys Jones

From: Matthew Phillips
Sent: 04 July 2019 14:49
To: planning_admin
Subject: FW: P/2019/0460
Attachments: Neil Taunt Letter 20 June 2019.pdf; NRW Letter june 2019.pdf

Please add email as Flood Officer comments and attached as general correspondence

From: Neil Taunt
Sent: 04 July 2019 14:42
To: Matthew Phillips
Subject: P/2019/0460

Matthew,

Thank you for the recent consultation on the above application.

The submitted information in relation to flood risk and proposed drainage strategy is identical to that provided in support of the previous application (P/2018/0560). This information considers the suitability of the site for inclusion of SuDS features to manage surface waters generated by any new development. Whilst it does identify varying ground conditions across the site, evidence was provided to demonstrate the suitability of ground conditions for use of soakaway across the site. Since the previous application Welsh Government have implemented Schedule 3 of the Flood & Water Management Act. This requires any new development with drainage implications of specified size demonstrate compliance with the now statutory SuDS standards for Wales and underpinning principles that should be incorporated into any future development scheme. Whilst the submitted FCA and drainage strategy does consider the use of SuDS on the site, I would request this is reviewed and re submitted prior to determination to clearly demonstrate a strategy for how the site will deliver a SuDS scheme compliant with the now statutory national standards. As you will be aware, SAB approval will be required prior to the commencement of any construction works on site, with the SuDS standards likely to have a significant impact on site layout. 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. Due to the scale of the proposed development it is likely that the SAB will have a duty to adopt elements of any SuDS scheme.

I am also aware of representations made in relation to both surface water and fluvial flood risk to the site (attached for reference). There is a suggestions that both NRW flood map and Development Advice Maps do not best represent the fluvial flood risk to the development site from the nearby Afon Alyn. I would recommend NRW's views are sought on this representation. If accepted by NRW then there may be implications for the areas that are appropriate for development, or there may be a requirement to mitigate any identified flood risk, or provide betterment locally to negate any potential impact.

With regards to surface water flood risk to the site, the submitted representation does provided images of standing water on both northern and southern parcels of land. This evidence does not appear to be contrary to that contained within the submitted FCA and drainage strategy that does indicated varying ground conditions across both parcels of land, with saturated areas identified to the northern parcel of land, and areas of significantly reduced infiltration capacity to the south. Any proposed SuDS scheme for the site will have to give full consideration to local ground conditions and exploit favourable conditions where appropriate. Any proposed scheme and layout would be expected to give full consideration to the design standards within the National Standards, with full consideration given to rainfall events in excess of the required design standards.

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

Many thanks

Neil

Neil Taunt MCIWEM C.WEM CEnv CSci

Uwch Swyddog Rheoli Llifogydd / Senior Flood Management Officer



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