

## Susan Davies

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**From:** Philip Forster  
**Sent:** 28 June 2019 10:36  
**To:** planning\_admin  
**Subject:** P/2018/0673

**Importance:** High

Please attach this to P/2018/0673 as flood officer response

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**From:** Philip Forster  
**Sent:** 25 June 2019 14:37  
**To:** David Williams <David.Williams@wrexham.gov.uk>  
**Subject:** FW: P/2018/0672  
**Importance:** High

From Neil...Welsh Water haven't stipulated that they won't accept surface water into the drain so there's nothing to say that they can't drain to the combined sewer at an attenuated rate. I'll have to hang it on this. It's just another nail in the coffin for the site.

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**From:** Neil Taunt  
**Sent:** 25 June 2019 11:46  
**To:** Philip Forster  
**Subject:** RE: P/2018/0672  
**Importance:** High

Hi Phil,

Thank you for sending through the additional information following my initial comments in October 2018.

I have reviewed the submitted information with specific reference to the means by which surface waters generated by the proposed development will be managed.

As requested in my previous response – "An indicative drainage proposal should be submitted, as detailed in the attached guidance note, including percolation tests carried out in accordance with the latest BRE365 guidance." Whilst reference is made to undertaking infiltration tests within the updated FCA and drainage strategy, this does not appear to have been carried out on site. BRE365 requires a minimum of 3 tests to be undertaken to best represent the post development conditions on site. The worst case result is then used for any future design purpose. Interpolation of data has also been used to determine infiltration rates which adds to the uncertainty of the information contained within the report.

It would appear that there is significant variability in ground conditions across the site with the suitability of infiltration varying across the test locations. Contrary to the report's findings, infiltration rates at locations SA06 and SA07 (both based on a single test so lower infiltration rates would be anticipated should the BRE365 methodology be fully followed), are below that normally considered appropriate (the Welsh Governments Statutory Standards suggest  $1 \times 10^{-5}$  as a workable minimum). Soakaways SA08 and SA09 both based on 2 tests (but including interpolated data) indicate ground conditions are suitable locally. SA10 reported as being too slow to record.

The proposed drainage strategy includes individual plot soakaways for each residential unit. The information and evidence contained within the report does not support this as being a viable and sustainable means of surface water management due to the reported ground conditions. When considering the proposed highway drainage solution, a soakaway feature is proposed to the western extent of the site, the capacity of which is below that normally expected as design is only proposed to accommodate the 1 in 30 yr. event. Surface waters should be managed up to the 1 in 100yr event with an inclusion for the impacts of climate change, with an appreciation of the impacts of

events in exceedance of this level. Whilst localised pooling on highways and public open space is acceptable in some instances, this needs to be understood and shown to be within acceptable quantities.

With no alternative means of disposal identified for surface waters generated by the proposed development, and the significant uncertainty that the proposed scheme is feasible based on the information submitted, it has not been demonstrated that surface waters generated by the proposed development can be sustainably managed. In the absence of any information to the contrary I would request the application be refused.

I would also reiterate my previous comments regarding the requirements of the SAB:

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

Many thanks

Neil

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**From:** Philip Forster  
**Sent:** 13 June 2019 16:05  
**To:** Neil Taunt  
**Subject:** P/2018/0672

Morning Neil,

It feels like it has been some time since we've spoken.

I've received some additional information in relation to the above application. You may have to cast your mind back... happy to receive any further comments on this.

Thanks

Phil

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**From:** Andrew Smith <[andrew.smith@narvo.co.uk](mailto:andrew.smith@narvo.co.uk)>  
**Sent:** 10 June 2019 21:28  
**To:** Philip Forster <[Philip.Forster@wrexham.gov.uk](mailto:Philip.Forster@wrexham.gov.uk)>  
**Cc:** Tony Catherall <[Tony@day-architectural.com](mailto:Tony@day-architectural.com)>; [paul@pfpm.consulting](mailto:paul@pfpm.consulting); David Williams <[David.Williams@wrexham.gov.uk](mailto:David.Williams@wrexham.gov.uk)>  
**Subject:** Holt Road

Phil

Please see attached an updated Flood Consequence Assessment and Drainage Strategy. This captures the results of the infiltration testing – and outlines how the site will be drained as a result of this. The masterplan is broadly unchanged as a result of this, except for the requirement for a swale in the north east of the site – which is marked in blue on the amended Proposed Masterplan.

I've also attached a revised parameters plan, which features a proposed footpath across the adjoining land owned by Wrexham CBC – to deliver a footpath. David – we can discuss this tomorrow.

Because Wrexham CBC Highways would like a new footpath link across the site to Dean Road, then Glyndwr are happy to provide a new 3m footpath / cycleway on the land which they own and then provide a financial contribution to Wrexham CBC (presumably via a S106) for the link to be provided across the Local Authority's land. The attached drawing Site Plan Holt Road Pedestrian & Cycle Path No Measure shows this route highlighted in a light brown colour. The total length of the route is 410 metres, with just 30 metres on Wrexham CBC's land (if the edge of the car park is the point to run the path to).

Regards

ANDREW SMITH  
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