

Cerys Jones

From: Matthew Phillips
Sent: 01 February 2019 11:50
To: planning_admin
Subject: FW: P/2019/0005

Flood Officer comments

From: Neil Taunt
Sent: 01 February 2019 11:35
To: Matthew Phillips
Subject: P/2019/0005

Hi Matthew,

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

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 and relevant local policies. This is needed to avoid potential problems such as 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 are duty bound adopt any scheme built in accordance with SAB approval.

Any revised 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. Of particular note are NRW's recent comments with regards to biodiversity and water quality.

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



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