

From: Sharon Holman
Sent: 04 March 2019 13:52
To: planning_admin
Subject: FW: P/2019/0141

Civ – flood officer resp

From: Neil Taunt
Sent: 04 March 2019 13:44
To: Sharon Holman
Subject: P/2019/0141

I am aware that an application for full planning permission has been received for the above site and have the following comments.

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. If no additional information is submitted prior to determination I would request the application be refused as it has not been demonstrated that surface water can be sustainably managed over the lifetime of the development.

The information submitted with the application indicates infiltration techniques will be used to manage surface waters. The requirements for SAB approval were brought to the applicants attention via the pre application consultation process. It would appear the applicant wishes to deal with the SAB approval process as a matter or detailed design should the application be successful. The indicative drainage design suggests a traditional piped system leading to an underground crate infiltration system – this is unlikely to be acceptable to the SAB. When full consideration is given to the now mandatory SuDS standards it is highly likely that this will have implications for site layout and should be given full consideration at the earliest possible stage.

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

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Uwch Swyddog Rheoli Llifogydd / Senior Flood Management Officer



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

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