

Cerys Jones

From: Matthew Phillips
Sent: 18 August 2017 11:17
To: planning_admin
Subject: FW: P/2017/0651

Senior Flood Officer comments

From: Neil Taunt
Sent: 11 August 2017 09:40
To: Matthew Phillips
Subject: P/2017/0651

Matthew,

Thank you for the recent consultation on the above application. I have significant concerns regarding the proposed method of disposal for surface waters generated from the development as detailed below. If no additional information is forthcoming prior to determination then I request the application be refused.

As detailed within the pre application consultation report, the applicant was advised “the strategy does not conclude that there is a feasible and achievable means to sustainably manage surface waters. I would strongly recommend that the WCBC guidance note on the management of surface waters generated by new developments is reviewed and that appropriate supporting evidence is included within any future planning application for the site.”

The revised FCA and Drainage Management Strategy (July 2017) Rev 2.0 does incorporate the results of a soakaway tests for the site, albeit a number of test locations are reliant upon a single test and may not give representative results for in situ soakaways (BRE 365 does require a minimum of 3 tests per location). This highlights the variability of ground conditions on site for the suitability of soakaway, but also summarises that due to site constraints (including gradient and engineering) “*site wide implementation of soakaways may not be feasible*”. It is therefore necessary to demonstrate that there is an alternative and additional means of disposal.

Reference is made to discharge to a watercourse to the west of the development site. Due to the nature of the local topography it is likely that the site does not naturally drain into the catchment of this watercourse and as such would add additional flow into it which may have a detrimental impact on flooding within that watercourse. I would normally advise against transfer of waters between natural watercourse catchments. Anecdotal evidence is also made to a possible culverted watercourse to the east of the site. No evidence of its existence, capacity to accommodate the discharge, or feasibility of making a connection is provided. It has therefore not been demonstrated that discharge to watercourse is a feasible option. If discharge to public sewer is to be considered a viable option then confirmation from Welsh Water that they would be willing to accept additional flow into the system should be provided. Appendix A – point 7 of the Local Planning Guidance note “Management of surface water generated from new development” details the required evidence to demonstrate that the site has an agreed point of discharge.

If this information is not forthcoming prior to determination I request the application be refused as it has not been demonstrated that there is a sustainable means of managing surface water generated by the development that will not adversely affect flood risk either to the site or surrounding area.

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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