

**From:** Martyn Richards  
**Sent:** 03 February 2014 16:42  
**To:** Geraint Nicholas Roberts  
**Cc:** Fiona Powell  
**Subject:** 13/1279 - Glebelands

Geraint,

I've received an enquiry from my colleague regarding the implications of the development drainage on the upstream section of watercourse adjacent to the allotments.

In view of this I have been through the Drainage strategy submitted by the applicant, the report was undertaken by Waterman.

Whilst it would appear that the report concludes that there will be no impact in terms of upstream flooding as a result of the assessed rainfall and flooding events the report concludes that the "*The use of soakaways is not likely to be feasible then surface water emanating from the development should discharge to the watercourse in the northern end of the site. Discussions regarding the rate of surface water discharge should be advanced with the relevant stakeholders during the detailed design process*"

Therefore it appears that the report does not consider the impact of storm water discharge from the developed site including the associated increase in impermeable areas, also the report indicates that the development is for 153 dwellings not the 248 that is now proposed. Whilst NRW may have consented to a free discharge to the River Usk, an unrestricted discharge to the on site reed especially during tide lock conditions may not be so favourable.

I would also note that the survey period of the watercourse flow rates took place during the summer of 2013 during a very long dry spell, in this respect I would question the robustness of the surveyed flows in terms of being representative of more "normal" flow conditions.

Also, I note the applicant is proposing to use a substantial area of permeable paving along the initial site access road. Given the conclusion in the report regarding the use of soakaways I would question the suitability of using such a system and will require the applicant to demonstrate by means of infiltration tests that this type of SUD system is appropriate.

Should you wish to discuss in more detail then please let me know.

Regards  
Martyn

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