

Gwasanaethau'r Ddinas
City Services

Canolfan Ddinesig/Civic Centre
Casnewydd/Newport
De Cymru/South Wales
NP20 4UR



QuadConsult Limited
Columbus House,
Greenmeadow
Springs Business Park, Coryton,
Cardiff,
CF15 7NE

4th October 2024

Dear Mr Mark Llewellyn,

**Re: SuDS Full Application Reference 24-0016 – APPROVED –
SUBJECT to CONDITIONS**

Development at Factory Road, Newport

In accordance with The Well-being of Future Generations (Wales) Act 2015, Schedule 3 to the Flood and Water Management Act 2010 and the Sustainable Drainage (Approval & Adoption) (Wales) Order 2018 comments have been provided regarding your application in response to the hierarchy S1 and Standards (S2 – S6) of the Welsh Government Statutory Standards for Sustainable Drainage Systems.

Review against the Statutory National Standards for Sustainable Drainage Systems

The running comments for the application have been made in the 'comments tracker'. The history and design progress of the application can be found in that document.

S1 – Surface Water Runoff Destination

Priority Level 1) Reuse/recycle

Rainwater harvesting has been discounted for the application as a result of lack of water demand and commercial viability. As interception is being provided throughout the site, this is acceptable to the SAB.

The inclusion of water butts has been included as part of the application, and although this does not provide a quantifiable contribution to attenuation or interception, it is positively accepted to the SAB.

Priority Level 2) Infiltration

Given the ground conditions of the site, infiltration has been ruled out, and alternative measures for surface water discharge has been considered. This is acceptable to the SAB.

Priority Level 3) Surface Water Body

A connection into a surface water body is not being pursued, and an alternative method for surface water discharge has been considered. This is acceptable to the SAB.

Priority Level 4) Surface Water Sewer

The development is not considering a connection into a surface water sewer. This is acceptable to the SAB.

Priority Level 5) Combined Sewer

The proposed surface water discharge is into a combined sewer.

Approval was requested at the start of the vetting process and has not yet been provided. We discussed with the applicant that this can be a pre-commencement condition.

No works shall commence (any construction activities) until confirmation of the S106, including the discharge rates stated on the approved drawings have been agreed by Welsh Water, this SAB approval with conditions, does not overrule the rates to be agreed by Welsh Water.

In the event that they do not agree to the proposed method of discharge, then a new SAB application will need to be submitted, with revised strategy.

Furthermore, the site is subject to a section 185 application – sewer diversion, which may impact the proposals of the site. This is included as a condition.

S2 Hydraulic Control

1) Interception

Interception has been demonstrated to be achieved via. the use of porous paving, green roofs, the attenuation basin and bio-retention areas, this is in accordance with table G2.1 of the statutory standards and any NCC local standards.

We do note that a small portion of the scheme will not receive any interception. Given the significant overage for the rest of the scheme, in this instance the SAB deems it as acceptable.

2) Runoff Rates

As referred to in the runoff destination section, the applicant needs to provide written confirmation of the acceptance from DCWW, and this forms a condition of approval.

4) Attenuation

Attenuation has been provided in a mixture of forms, namely; porous paving, bio-retention areas, oversized pipes and an attenuation basin. This is acceptable to the SAB.

5) Exceedance

An exceedance flow drawing has been provided which demonstrates that during storms of exceedance, the flows from site are managed so that buildings are not put at risk of flooding. This is acceptable to the SAB. This essentially mimics the existing scenario, but betterments have been created as a result of the modern design.

S3 Water Quality

Sufficient water quality has been met by demonstrating that the appropriate mitigation is provided for each requirement. This is acceptable to the SAB.

S4 Amenity

The documents have been reviewed by the landscape team, and the proposals are acceptable to the SAB.

S5 Biodiversity

The documents have been reviewed by the landscape team, and the proposals are acceptable to the SAB.

S6 Construction & Maintenance

A full COMSI has not been provided for the scheme, in particular the details of how drainage will be managed during construction – although please refer to statutory standard 6.

The consultant stated that the contractor was not at present on board, and that they are likely to have a significant contribution to the required documents, therefore, it is acceptable for the SAB to allow this as a pre-development condition.

It is noted that the Maintenance schedule of the once constructed items is acceptable.

Inspection

The number of inspections is estimated to be 5, although this is subject to change, dependant on progress.

It is the developer/contractor's duty to ensure that inspections for critical stages are undertaken and will be required to be arranged a minimum of 5 working days before hand. The inspections are subject to an inspection fee and dependant on the final number off, it is likely that payment for these will be grouped.

The failure of inspections will likely require intrusive investigations at a later date. Any costs associated with these investigations will be paid for by the developer. If the intrusive investigations demonstrate that the construction is not in accordance with the approved plans, then the SAB would be in a position to ask for this to be reconstructed to suit the approved plans.

Conclusion

Through several rounds of comments, the SAB is in a position to offer SAB approval in principle, but this is heavily dependent on the conditions further below being discharged. In the event that these comments are not discharged then SAB approval is voided. The conditions highlighted as pre-commence conditions **MUST BE** discharged prior to any construction activities.

Please note that this authority is checking for compliance only against the statutory standards. The design elements are still the responsibility of the designer/contractor.

Conditions

No changes to the approved design, including changes to materials to be used or product substitutions, shall be permitted unless agreed in writing with the Sustainable Drainage Approval Body.

Appropriate Use Conditions

The developer / owner / occupier is reminded that to cause or knowingly permit pollution of surface or ground waters is a criminal offence. The development permitted under this approval is for "Medium" and "Low" hazard activities only. "High" hazard activities, including, but not limited to

- a) Storage, loading / unloading or handling of any hydrocarbons, chemicals liable to cause environmental damage. Particular attention is drawn to any materials or substances as listed on the "Freshwater's priority hazardous substances, priority substances and other pollutants" and the "Freshwaters specific pollutants and operational environmental quality standards" lists published by the Environment Agency and applied by Natural Resources Wales.
- b) Vehicle wash-down or maintenance activities
- c) Any activities for which a Bespoke or Standard Rules Environmental Permit is required under The Environmental Permitting (England and Wales) Regulations 2016.

are expressly excluded from this Approval.

Pre-commencement conditions

1. Pursuance to approval

Condition: The development hereby permitted shall be carried out in accordance with the following approved plans and documents with no changes, including changes to materials to be used or substitution of alternatives, to be permitted unless agreed in writing with the Sustainable Drainage Approval Body:

Approved Documents:

Engineering Layout; C-001 Rev E
Suds Layout; C-002 Rev E
Kerbing Layout; C-003 Rev 0
Overland Flow Paths; C-004 Rev A
Catchment Plan; C-005 Rev A
Drainage Details; C-006 Rev C
Construction Details; C-007 Rev B
sUDS Sections; C-008 Rev B
sUDS Maintenance Access Plan; C-009 Rev D
Detention Basin Setting Out; C-0010 Rev B
SuDs Details; C-011 Rev A
SuDs Details; C-012 Rev B
Rain Garden Section A-A; C-013 Rev C
Rain Garden Section B-B; C-014 Rev C
Rain Garden Section C-C; C-015 Rev C

Rain Garden Section D-D; C-016 Rev C
Rain Garden Section E-E; C-017 Rev C
Rain Garden Section F-F; C-018 Rev C
Rain Garden Section G-G; C-019 Rev C

Reason: To ensure the development is carried out only as approved by the Sustainable Drainage Approval Body and is likely to operate in compliance with the National Standards.

2. Expiry Date of Permission

Condition: The development hereby permitted shall be begun before the expiration of five years from the date of this permission.

Reason: To ensure the drainage system functions as designed and in accordance with the National Standards.

3. Notification of commencement

Condition: The applicant shall notify the Sustainable Drainage Approval Body in writing at least 28 days prior to the commencement of work on site.

Reason: To ensure the Sustainable Drainage Approval Body is aware of the commencement of the development in order to notify all interested parties.

4. Method Statement

Condition: Prior to commencement on site a method statement detailing the construction of the works, including temporary works, shall be submitted to and approved in writing by the Sustainable Drainage Approval Body. The method statement shall include but is not limited to;

- a. Detailed construction program and schedule of work for the approved drainage system.
- b. Information provided for Construction Design and Management (CDM) Regulations.
- c. Details of construction of all SuDs components.
- d. Management of any temporary works that will affect the approved system

Construction issue general arrangement drawings

- e. Details of mitigation for; pollution/ sediment loading, potential damage to the sustainable drainage components during construction, flooding and incidental damage and measures to regulate discharge to downstream systems.

Reason: To ensure the works are adequately planned, and that the works are served by an adequate and approved means of drainage to comply with the National Standards.

5. Phased Construction

Condition: Prior to commencement on site a phasing plan for construction of the drainage system shall be submitted and approved in writing by the Sustainable Drainage Approval Body. This shall include details of;

- a. Landscaping considerations
- b. Protective measures and/or stabilisation methods
- c. Areas needing protection against compaction

Reason: To ensure all phases of the development construction are adequate and served by an approved means of drainage to comply with the National Standards.

6. Permissions to Connect and Diversion

Condition: The applicant shall provide the Welsh Water section 106 confirmation in relation to the discharge rate, volumes and overall proposals. In the event Welsh Water reject this then the scheme will be rejected.

Additionally, confirmation of the section 185 application will also need to be provided.

Reason: To ensure that the provisionally agreed discharge location is agreed by the asset owner, and so that no potential impacts on the site are encountered.

7. COMSI

Condition: The applicant shall provide the SAB with an acceptable drainage management plan during construction. In particular, runoff rates, attenuation, permission to connect and water quality all need to be addressed.

Reason: To ensure that drainage throughout the construction process complies with the statutory standards.

8. Covenant Agreement

Condition: As the scheme is for more than one block of flats, it has been agreed that the developer will enter into a covenant agreement. To enable construction to commence, then we will allow this to be undertaken during the possible construction process, subject to the agreement being completed within 6 months of this approval. In the event that this is not signed into within this time period then the SAB will request that construction works are halted.

Reason: To ensure that the future maintenance of the scheme is protected.

Pre-construction condition

1. Inspection Fees

Condition: The drainage system hereby permitted shall be subject to inspections by the Sustainable Drainage Approval Body (or their nominated representative). Any inspection shall be charged at £168 per inspection, and to reduce delays these will be grouped into blocks of 5. The inspection fees (£840 total) shall be paid to the Sustainable Drainage Approval Body 28 days prior to notice of the commencement of works on site. It is estimated that a total of 5 inspections will be required, although this number may increase.

Reason: To ensure the works are adequately inspected pursuant to the duty to adopt the drainage system.

Construction Conditions

1. Groundwater

Condition: Should groundwater be encountered at any point during construction works, the developer shall cease all construction activity within a 25m radius of the point at which groundwater is encountered and notify the Sustainable Drainage Approval Body. No construction work within the 25m radius shall re-commence until expressly permitted in writing is provided by the Sustainable Drainage Approval Body.

Reason: To ensure protection of groundwaters and to ensure that the sustainable drainage system is likely to comply with the requirements of the National Standards.

2. Inspection Requirements

Condition: Provision for inspections to be carried out by the Sustainable Drainage Approval Body during construction of the approved works, including, but not limited to:

Any necessary plant and labour are made available to facilitate inspection and appropriate testing eg. CCTV.

Safe access is provided to the extent of the drainage system, including access to private property.

Minimum of five working days notification of any works that are to be covered.

An induction is provided for the appointed inspector, as a specific requirement may need to be met to access the site.

Reason: To ensure the works are adequately inspected pursuant to the duty to adopt the drainage system.

3. Testing Requirements

Condition: Testing of the sustainable drainage system will be undertaken, where required by the Sustainable Drainage Approval Body, once the sustainable drainage system has been fully constructed and in the presence of the appointed inspector. All costs for suitable / appropriate testing will be covered by the applicant. The tests will be defined by the Sustainable Drainage Approval Body in writing to the developer, which may include, but not be limited to:

- a. CCTV surveying of the completed system
- b. Testing of pipes, culverts, access chambers and manholes
- c. Pressure testing of impermeable liners
- d. In-situ permeability testing of any infiltration or filtration system or surface

Reason: To ensure that the works are adequately inspected, and that the sustainable drainage system is constructed in accordance with the approved design.

4. Storage of materials

Condition: During construction, no solid matter, mud, slurry, fuel or lubricants shall be stored within 8 metres of the banks of a watercourse or drainage system, without prior written approval from the Sustainable Drainage Approval Body. Site runoff shall be adequately treated to ensure that no sediments or pollutants are passed on to any downstream receiving water bodies, drainage features or sewers.

Reason: To ensure on and off-site receptors including the environment and drainage system are protected from construction activities.

5. Completion of works

Condition: The developer must notify the Sustainable Drainage Approval Body of completion of the phase or approved drainage system.

Reason: To ensure the development is completed pursuant to approval.

Post-Construction

1. Post Construction / As Built Information

Condition: The developer is to supply copies of the Construction Health and Safety File, including details of all electrical and other test certificates, operation and maintenance manuals to the Sustainable Drainage Approval Body within 28 days of completion of the approval.

Reason: To ensure the drainage system functions as designed and approved prior to adoption.

2. Retention and Maintenance

Condition: The approved drainage system shall be retained on site and must be maintained by the developer / owner / occupier in accordance with the agreed maintenance schedule.

Reason: To ensure the drainage system functions as designed and in accordance with the National Standards. / To ensure the drainage system functions as designed and approved prior to adoption.

Site Specific

1. Bioretention / Rain Garden Soils

Condition: The Bioretention System / Rain Garden soils shall conform to the specification as provided within Box 18.1 of The SuDS Manual (CIRIA C753) and shall be demonstrated to comply either through the provision of laboratory test reports or through site testing.

Reason: To remove ambiguity from the design proposals and to ensure that the system conforms with the requirements of the Welsh Government SuDS Standards.

2. Porous Paving Sub-base / Bedding Grit

Condition: The porous paving sub-base/grit shall conform to the specification as provided within section 20.11 of The SuDS Manual (CIRIA C753), particularly Box 20.12 and 20.14 and shall be demonstrated to comply either through the provision of laboratory test reports or through site testing.

Reason: To remove ambiguity from the design proposals and to ensure that the system conforms with the requirements of the Welsh Government SuDS Standards.

Please note that these conditions are still fundamental to the SAB approval, and if they cannot be met, then it effectively voids the SAB approval.

If you have any comments or queries, please contact sab@newport.gov.uk

Yours faithfully

Ben Jackson

For Head of City Services