



TRANSPORT PLANNING

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NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

Planning Application No: 2/3/24/081700

IMA Designer's Response to SAB Pre-Application Observations

Dated 18/03/2026

June 2026

Job No. IMA-24-077

Application No. SP2025/0034

**Erection of 8 residential dwellings following the demolition
of a former building and outbuildings**

Ty'n Yr Heol Neath, 1 Henfaes Road, Tonna, SA11 3DX

Engineer Advice

These comments are made on the back of the newly submitted FCA. Please read this document in addition to the previously issued comments for matters not addressed within this FCA.

For a full SAB approval to be granted, each of the six National SuDS Standards must be fully met and evidenced within the final submission.

The SAB strongly advises applicants to resolve key uncertainties and provide the supporting documents listed below at pre-application stage, wherever possible.

Reason: *Early clarification allows the SAB to provide meaningful technical guidance, reduces the risk of redesign late in the process, avoids delay at full-application validation, and ensures the final design is robust, buildable and compliant.*

IMA's response:

Comment noted.

Standard S1 - Surface Water Runoff Destination

The SAB strongly advises securing written confirmation from on whether the adoptable road will drain via infiltration or through a restricted discharge to the highway sewer.

Reason: *The drainage strategy, attenuation requirements and exceedance routing cannot be validated by the SAB until this decision is confirmed, and changes at full-app stage may lead to significant redesign.*

IMA's response:

Comment noted

Priority Level 2: Discharge of surface water into ground:

Although reduced from the extreme 1×10^{-2} m/s, the final calculated rates remain:

$\sim 7.7 \times 10^{-5}$ m/s

$\sim 1.1 \times 10^{-4}$ m/s

$\sim 1.5 \times 10^{-4}$ m/s

These are still at the upper end of typical BRE 365 findings for sand/gravel

The SAB strongly advises that the lowest infiltration rate obtained from the three BRE365 test cycles is used for all infiltration system design, in accordance with CIRIA methodology.

Reason: *This ensures conservative sizing, correct 24-hour drain-down performance, and prevents having to resize features at full SAB submission.*

IMA's response:

We have utilised an Infiltration rate of 7.7×10^{-5} m/s for all infiltration devices. The FCA and drainage strategy has now been updated to incorporate this.

Priority Level 4: Discharge to a Surface Water Sewer or Highway Sewer:

If discharge to the highway sewer remains an option, the SAB strongly advises submitting a CCTV survey of the receiving pipe at pre-app stage.

Reason: *Early confirmation of sewer condition, alignment and depth prevents the possibility of the outfall proving unviable later, avoiding redesign and potential delay*

Given the above, the SuDS design is non-compliant with Standard 1 at this stage.

IMA's response:

The site benefits from having two surface water discharge options. Discharging via infiltration as part of a S38 application would be subject to NPT Highways permission. The alternative option is to discharge to the sewer subject to a S106 application and CCTV drainage survey. A drainage survey shall be submitted should we opt to discharge to the highway sewer. We would suggest this could be dealt with by a planning condition.

Standard 2 – Surface Water Runoff Hydraulic Control

The FCA now includes revised hydraulic calculations, updated catchment plans, and infiltration test evidence within Appendices H and J, including BRE365 photographs, pit logs and full three-cycle drawdown results.

These satisfy the request for infiltration test documentation and provide more realistic infiltration rates than the previously stated 1×10^{-2} m/s. However, the FCA does not confirm that the lowest infiltration rate from each test location has been adopted in accordance with BRE365/CIRIA guidance, and several calculations remain dependent on this clarification.

The FCA confirms suitable exceedance routing and includes updated attenuation volume estimates; however, core elements of the Standard 2 requirements remain unresolved. These include:

- No confirmation from NPT Highways regarding the drainage strategy for the adoptable road (infiltration vs. restricted sewer discharge).*
- No infiltration testing undertaken beneath or adjacent to the proposed carriageway.*
- No CCTV condition survey of the receiving highway sewer (should a sewer connection be pursued).*
- No drawings demonstrating required offsets from buildings/boundaries or 1 m clearance above high groundwater level.*
- No pipe sizing, gradients, or SuDS construction details to evidence feasibility of the proposed system.*

*While the ACO drain comment has been addressed through the provision of multiple gullies at the site entrance, **the absence of key supporting evidence means Standard 2 cannot yet be considered satisfied at pre-application stage.***

IMA's response:

The lowest infiltration rate of 7.7×10^{-5} m/s has now been adopted for all calculations and can be found within the FCA. The drainage strategy has been updated to incorporate this change.

We are awaiting a response from NPT Highways on discharge via infiltration or to sewer. As noted above we have infiltration available as a possible option or a discharge to the sewer. Infiltration test results have been undertaken across the site showing infiltration is a viable option. If a discharge to the sewer is required, then a CCTV drainage survey could then be undertaken if this option is pursued. As noted above we would suggest this could be dealt with by planning condition.

Comment

Standard S3 – Water Quality

The SAB strongly advises including an outline pollution mitigation strategy for the adoptable road.

Reason: Highway runoff presents a higher pollution hazard. Early identification of suitable SuDS treatment components ensures the final design can meet the Simple Index Approach and avoids the risk of layout modifications later.

Based on the information provided, the proposed drainage strategy meets the requirements of SAB Standard 3 – Water Quality for the residential areas but not yet for the road.

IMA's response:

The road is to be offered for adoption to NPT Highways. Trapped road gullies are currently shown for discharge to existing highway sewer option which will provide an element of interception/water quality treatment. Details are to be confirmed once the discharge option has been agreed.

Comment

Standard S4 – Amenity

The SAB strongly advises submitting an outline amenity and landscaping plan demonstrating how SuDS features deliver visual, recreational and place-making value in line with Standard S4.

Reason: Amenity integration affects layout, planting, access and maintenance. Resolving design intent early prevents conflicts during full design development.

Given the above, the SuDS design submitted is deemed non-compliant with Standard 4 at this stage.

IMA's response:

The landscaping plan is included within the Architect's Site Plan.

Standard S5 – Biodiversity

The SAB strongly advises providing a biodiversity enhancement plan detailing planting species, habitat connectivity, and ecological SuDS features.

Reason: SuDS components often contribute to ecological mitigation, and their positioning must be coordinated with buffer zones, protected trees and site layout before full submission.

Given the above, insufficient information has been submitted to accurately assess and approve the biodiversity enhancement. Therefore, the SuDS design submitted is not compliant with Standard 5.

IMA's response:



The landscaping plan is included within the Architect's Site Plan and identifies the SuDS features across the site, together with a proposed ecological mitigation zone.

The Ecological Management Plan, which is referenced within our Flood Consequences Assessment (FCA), was previously submitted as part of the Planning Application.

There is no publicly accessible amenity space within the site. All ecological areas are located behind secure fencing for management and maintenance purposes around the site perimeter. As a result, these areas will not affect the maintenance of the individual soakaways or porous paving SuDS systems. The SuDS features can therefore be maintained in accordance with the FCA with ease of access.

Standard S6 – Design of drainage for Construction, Operation & Maintenance

The SAB strongly advises submitting outline SuDS construction details, maintenance responsibilities, a Construction Phase Plan (CPP), and a Surface Water Management Plan (SWMP) at pre-app stage.

Reason: *These documents demonstrate that the selected SuDS are deliverable, serviceable, and manageable during construction. Identifying constraints early avoids buildability conflicts and late redesign.*

Given the above, the SuDS design submitted is non-compliant with Standard 6.

IMA's response:

Refer to section 4 of the FCA for surface water management plan. Construction details are to be provided at detailed design stage.

Comment noted.