**Appendix 12.2 – Relevant Correspondence**

## Tommy Thompson

**From:** SAB <SAB@wrexham.gov.uk>
**Sent:** 01 May 2024 12:00
**To:** erlasparkconsultation@havingyoursay.co.uk
**Subject:** Comments on the Flood Consequence Assessment

Good morning,
I am emailing on behalf of the SuDS Approving Body at Wrexham County Borough Council to make some comments on the Flood Consequence Assessment (hereafter referred to as the FCA). My comments are contained under headings below.

**SuDS Approving Body**
I noted in my previous correspondence with someone representing the development that Schedule 3 of the Flood and Water Management Act 2010 was implemented in Wales from 7th January 2019. This means that your development will require SAB approval in addition to planning permission. SAB approval must be obtained from the Lead Local Flood Authority before construction can legally begin. This cannot be obtained from planning as SAB approval is a separate process, and it is up to yourselves as developer to contact us regarding this application when you are a stage where you are able to begin this process. We offer both a pre-application advise service in addition to the full application, and we would advise you to engage with the team at the earliest opportunity.

**Guidance Used in the Design**
We note that FCA references the National Planning Policy Framework and the Non-Statutory Technical Standards for Sustainable Drainage Systems (2018). These are not the standards that we assess against in Wales as these are the policy documents for England. We would expect to see the development design to meet the requirement of the following documents:

- Planning Policy Wales (PPW)
- Statutory Standards for Sustainable Drainage Systems – designing, constructing, operating and maintaining surface water drainage systems. (Welsh Government)
- Sustainable Drainage (SuDS) Statutory Guidance (Welsh Government)

We appreciate that the CIRIA SuDS Manual has been used in the design, and we would encourage you to continue to draw on this resource.

**Proposed Surface Water Drainage Strategy**
We note that Section 6.2 of the FCA notes that roadside swales and rain gardens are proposed where possible. I am afraid that these will be critical to the SAB approval design as we will not accept one primary SuDS feature to manage the surface water on site, especially on the scale of storage needed for this site. An open management train, rather than below ground tanks, would be preferred where possible to further meet the biodiversity and amenity requirements. This is not currently indicated on the drainage strategy shown in Appendix C, but it is implied in Section 6.5.

We note that if infiltration is not viable on site, that the next preferred discharge location is the ordinary watercourse. We would require the discharge to be limited to greenfield runoff rate. This outfall will also require a separate ordinary watercourse consent from Wrexham County Borough Council.

**Hydraulic Calculations**
We would not expect to see significant surcharging of pipes in the 1 in 30 year event, although we would expect some of the storage capacity to be functioning. There should be no flooding in the 1 in 100 year event as we expect the drainage system to manage all of the surface water in this event.

If you have any questions about the above, please do not hesitate to get in touch via this email, or via flooding@wrexham.gov.uk.

Kind regards,

Cathryn Hughes
Swyddog Risg Llifogydd Technegol
Technical Flood Risk Officer

BSc (Hons) Earth and Environmental Science, MSc Sustainable Water Management.

01978 729639 or 07789 745497

Cyngor Bwrdeistref Sirol Wrecsam, Adran Amgylchedd a Thechnegol, De Ffordd yr Abaty, Ystad Ddiwydiannol Wrecsam, Wrecsam LL13 9PW

Wrexham County Borough Council, Environment & Technical Department, Abbey Road South, Wrexham Industrial Estate, Wrexham LL13 9PW

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## Tommy Thompson

| | |
|---|---|
| From: | Cathryn Hughes <Cathryn.Hughes@wrexham.gov.uk> |
| Sent: | 08 January 2024 16:22 |
| To: | Tommy Thompson |
| Cc: | Darren Williams; Clare Whiting; Kevin Edwards; SAB |
| Subject: | FW: LLFA Drainage Consultation - Erlas Park |
| Attachments: | Greenfield Runofff Rate.docx; 784-B024030-TTE-00-XX-DR-UD-40-P01-Strategic masterplan - Preferred option.pdf; ERLP-ACE-00-00-DR-C-0002 - Existing Greenfield Catchment Area.pdf |

Dear Mr Thompson,
I have been passed your email by Darren Williams, Chief Officer for the Environment and Technical Department at Wrexham Council. Thank you for reaching out to discuss your drainage proposal so early in your design. At this stage, with the information provided, I do not feel able to provide an agreement in principle to this design, but there are a number of comments that I wish to make which are outlined below.

I believe that infiltration would be a suitable method for surface water management on this site as conditions at other sites in the area allow for this. However, I would like to see a multiple step SuDS train within the development rather than a reliance on three main SuDS ponds. This would be to meet the biodiversity, water quality and amenity elements of the SAB application. The infiltration basins themselves, whilst on topographical gradient, should not be too much of an issue as long as an exceedance flow path can be provided within the red line boundary of the planning permission.

A discharge to watercourse would be acceptable if you can provide evidence as to why infiltration was not possible. The statutory guidance notes that there should be 1 m clearance between the base of infiltration structures and the water table throughout the year, so I would recommend carrying out 12 months of tests to be submitted with the SAB application. If it were to be found that the development must discharge to watercourse, the surface water would ideally go through some sort of treatment within SuDS features before it entered the watercourse. This could be achieved by reed beds in a swale system for example.

Thank you for outlining your plans for foul sewerage on the site. I should note that Wrexham Council LLFA would object to on-site wastewater treatment unless sufficient dilution could be achieved throughout the year. This would be on grounds of water quality.

I would be happy to provide a further judgement on the drainage strategy when it becomes available. In addition, when you are ready to start the SAB application process, please email the team at SAB@wrexham.gov.uk.

Kind regards,

Cathryn Hughes
Swyddog Llifogydd
Flood Officer

BSc (Hons) Earth and Environmental Science, MSc Sustainable Water Management.

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From: Clare Whiting <Clare.Whiting@wrexham.gov.uk>
Sent: 08 January 2024 12:27
To: Kevin Edwards <Kevin.Edwards@wrexham.gov.uk>; Cathryn Hughes <Cathryn.Hughes@wrexham.gov.uk>
Subject: FW: LLFA Drainage Consultation - Erlas Park

Kev/Cathryn

Can you respond and copy us in, please.

Thanks
Clare

**Clare Whiting**
Ysgrifenyddes i Darren Williams, Prif Swyddog Amgylchedd a Thechnegol/
Secretary to Darren Williams, Chief Officer Environment & Technical

01978 729701
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From: Tommy Thompson <tommy.thompson@adeptcsce.com>
Sent: 05 January 2024 16:46
To: Darren Williams <Darren.Williams@wrexham.gov.uk>
Subject: LLFA Drainage Consultation - Erlas Park

Good afternoon Darren,

Apologies if you are not the right person to send this to, I was looking through the Council website but struggled to find an appropriate email for contacting the council regarding proposed drainage matters for planning.
If this is not your area can you please pass this email onto someone within the councils drainage / water team.

I am in the process of developing a drainage strategy for a new development off Cefn Road. The proposed site is roughly 49.44 hectares, greenfield and it's estimated that when built out the development will have an impermeable are of 16.5a. The development will consist of 900 new houses, several sports pitches and a new school and I would like to get the drainage principles agreed prior to our planning submission. Draft copy of the strategic masterplan attached for information.

The sports pitches will be given new land drainage and discharged to ground via soakaway.

It is intended for the remaining surface water drainage to drain via a gravity system to two large infiltration basins located along the eastern site boundary. These basins have been sized using an infiltration rate derived from a nearby test location. Further testing is proposed at the basin locations to firm up the basin design and confirm ground water levels prior to submitting to the SAB for approval.

My concern is that the only viable location for the basins is to an area where the topography is quite steep, which means as we cut the new basins into the hillside, the base on the north side will be approximately 3-4m below existing ground levels. The basins have been designed to provide 300mm freeboard above the 100 year +CC storm and infiltrate to ground. Should groundwater be higher than expected or, at the depth noted above infiltration rates are not favourable, we would like to discharge to a nearby watercourse at a greenfield runoff rate.
We have used the ICP SuDS tool within InfoDrainage to estimate runoff rates which has confirmed that QBAR for the site is 5.6l/s. Print out attached for your information.

I have used site topographical information and lidar information to assess the existing catchment which drains to the existing watercourse which is approximately 22.6 hectares. PDF attached for reference showing the existing catchment, drain location and proposed basins.
Subject to confirmation of the watercourse / drain suitability and as noted above, confirmation of infiltration rates and groundwater levels at the proposed basin locations we would like to attenuate the surface water flows discharge into the watercourse at a rate of 126l/s.

The foul drainage has not yet been finalised; we are in discussions with Welsh Water regarding this. There is an existing 1050dia combined sewer which runs through the site, this is believed to be at capacity and WW are currently undertaking a capacity assessment.
Should there be no spare capacity within the combined sewer then an option which is being considered as an alternative is to provide a new on-site treatment works. This would treat the effluent and discharge the treated flows into either a drainage field or the same watercourse as the surface water.

The site is not located within a Groundwater Source Protection Zone (SPZ) and located within Flood Zone 1.

Can you please confirm if this will be acceptable to Wrexham Council acting as the lead Local Flood Authority for this area and let me know if you have any comments?

Please do not hesitate to contact me if you require anything further or would like to discuss any of the above.

Regards,

**Tommy Thompson** **IEng, MICE**
Associate Civil Engineer
**Adept Civil and Structural Consulting Engineers**

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We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.

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## Tommy Thompson

**Subject:** RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

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**From:** Jake MacMillan <Jake.MacMillan@dwrcymru.com>
**Sent:** 01 August 2024 15:52
**To:** Tommy Thompson <tommy.thompson@adeptcsce.com>
**Subject:** RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

Hi Tommy,

Thank you for the below queries, and apologies I'd not got in touch to advise receipt of these. I have consulted numerous colleagues and have the below comments in red. Apologies I've not yet had a response on points 2 and 3, in regards to point 3 I have asked our design engineers for their feedback on this. I will advise further once I have more clarity on these points however hopefully the below responses will be of use in the meantime.

Best regards,

**Jake MacMillan**
Development Planning Officer | Developer Services
Dŵr Cymru Welsh Water

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**From:** Tommy Thompson <tommy.thompson@adeptcsce.com>
**Sent:** Friday, July 12, 2024 2:57 PM
**To:** Jake MacMillan <Jake.MacMillan@dwrcymru.com>
**Subject:** RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

******** External Mail ********
Good afternoon Jake,

Thank you for sending this through, I have some queries which you can hopefully assist with.

- The modelling shows the existing network floods at 2,609 nodes with 441 having flooding greater than 25m3 but doesn't seem to have ever been reported. The existing model suggests 11,025m3 of flooding ? (Puts some doubt into the accuracy of their existing model?). The model has undergone dry weather, storm flow and historical verification to understand the validity of the model prior to undertaking the hydraulic detriment assessment. This ultimately compares model predictions against observed data i.e. flow survey data, telemetry, historical data sets, reported flooding etc. The DWF and Storm verification plots are contained in the rear of the report which observes model predictions against observed data.

- They've run the future sims assuming 1,100 units. However, we notified Welsh Water in December last year, before the modelling work had started that it had been reduced to 900 total. Whilst this does not fix the existing flooding issues it reduces the population by nearly a 5th. (2,750 down to 2,250) Less flows so the solutions should be reduced slightly in terms of scale and cost.

- Report requires additional online storage of 385m3 to be provided with the design solutions proposed requiring additional land purchase. Proposed location is outside our development boundary. Could a design be achieved to deliver this extra storage on plot, next to the existing combined sewer rather than being outside the development boundary. We had allowed for a 21m easement to the existing sewer (10times the pipe diameter) following further consultation with WW this was reduced to 12m. So there is potentially 4m of space either side of the sewer over the length through the development to fit additional storage.

- Is this additional storage solely for our development or is it intended to assist in in the wider WW flooding issues? Modellers are tasked with providing options to provide a zero-detriment outcome to return system performance to existing levels.

Regards,

**Tommy Thompson** **IEng, MICE**
Associate Civil Engineer
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## Tommy Thompson

From: Jake MacMillan <Jake.MacMillan@dwrcymru.com>
Sent: 08 February 2024 14:21
To: Tommy Thompson
Subject: RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

Hi Tommy,

I understand that this proposal will be subject to a SAB application who would be the body to adopt the surface water network.

The following link should provide you with some useful guidance, you can also find a copy of our leaflet regarding the proximity of SuDS to our assets at the following link under "Want to know more?" – https://developers.dwrcymru.com/en/help-advice/regulation-to-be-aware-of/sustainable-drainage-systems.

Best regards,

Jake MacMillan
Development Planning Officer | Developer Services
Dŵr Cymru Welsh Water

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From: Tommy Thompson <tommy.thompson@adeptcsce.com>
Sent: Thursday, February 8, 2024 2:01 PM
To: Jake MacMillan <Jake.MacMillan@dwrcymru.com>
Subject: RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

******** External Mail ********
Hi Jake,

Thanks for this.

For clarity we are not proposing to connect SW flows into the existing combined sewer.
New Surface Water sewers are proposed on-plot which will be put forward for S104 adoption.

The current strategy is to drain the site to two large infiltration basins located to the east of the development.
To trying the reduce the size of these basins and to be compliant with various elements of the SAB, SuDS will be required throughout the development.
My query is regarding new SuDS discharging into a New S104 SW sewer and adoption of the infiltration / attenuation basins.

In this instance what are Welsh Waters restrictions regarding the use of SuDS.
Will WW accept new S104 sewers discharging into an adoptable infiltration basin, or will this basin need to outfall to a nearby watercourse?

Regards,

**Tommy Thompson** IEng, MICE
Associate Civil Engineer
**Adept Civil and Structural Consulting Engineers**

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From: Jake MacMillan <Jake.MacMillan@dwrcymru.com>
Sent: Thursday, February 8, 2024 1:51 PM
To: Tommy Thompson <tommy.thompson@adeptcsce.com>
Subject: RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

Hi Tommy,

Thank you for the below, I can confirm that the network surrounding this site is predominantly combined, we therefore wouldn't be in a position to accept surface water flows into this network. For context we are actively seeking to remove surface water from our network, this is due to the impact it has on inundating sewers downstream which can no longer cope with additional surface water being added. With regards to adoption, we wouldn't be in a position to adopt these as they wouldn't be communicating with the public sewerage network.

Best regards,

Jake MacMillan
Development Planning Officer | Developer Services
Dŵr Cymru Welsh Water

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From: Tommy Thompson <tommy.thompson@adeptcsce.com>
Sent: Tuesday, February 6, 2024 2:17 PM
To: Jake MacMillan <Jake.MacMillan@dwrcymru.com>
Subject: RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

******** External Mail ********
Good afternoon Jake,

I trust you're keeping well.

We are in the process of finalising the drainage strategy for the site and to be compliant with the biodiversity, water quality and amenity elements of the SAB application, the LLFA have requested multiple SuDS be used across the site to create the treatment train.

Do Welsh Water have any restrictions on the discharge of surface water flows from SuDS features into the WW network (New or existing)?
Will WW adopt any of the SUDS features or does this need to be done by a third party? If so which SuDS type do WW consider to be adoptable?

Regards,

**Tommy Thompson** **IEng, MICE**
Associate Civil Engineer
**Adept Civil and Structural Consulting Engineers**

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From: Jake MacMillan <Jake.MacMillan@dwrcymru.com>
Sent: Thursday, January 4, 2024 12:16 PM
To: Tommy Thompson <tommy.thompson@adeptcsce.com>
Cc: Richard Parker <richard.parker@adeptcsce.com>
Subject: RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

Hi Tommy,

I would agree that the results of the HMA would be required to consider this. I'm not involved in designing the solutions myself, however in theory if a rising main that distance were to be proposed, this is where the financial comparison mentioned below would take place.

Best regards,

Jake MacMillan
Development Planning Officer | Developer Services
Dŵr Cymru Welsh Water

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From: Tommy Thompson <tommy.thompson@adeptcsce.com>
Sent: Wednesday, January 3, 2024 12:30 PM
To: Jake MacMillan <Jake.MacMillan@dwrcymru.com>
Cc: Richard Parker <richard.parker@adeptcsce.com>
Subject: RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

******** External Mail ********
Hi Jake,

Thank you for the confirmation below.

Although hypothetical for now until we have the results of the capacity assessment on the existing 1050 combined sewer.

For clarity, if following assessment the existing sewer it's deemed there is no available capacity, does the below suggest pumping to the Five Fords WWTW located 2.14km south (As the crow fly's), 3.35km following roads, is the preferred WW solution for the foul drainage?

Regards,

**Tommy Thompson** **IEng, MICE**
Associate Civil Engineer
**Adept Civil and Structural Consulting Engineers**

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From: Jake MacMillan <Jake.MacMillan@dwrcymru.com>
Sent: Wednesday, January 3, 2024 10:31 AM
To: Tommy Thompson <tommy.thompson@adeptcsce.com>
Cc: Richard Parker <richard.parker@adeptcsce.com>
Subject: RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

Hi Tommy,

Thank you for the below and happy new year to you to.

I have asked our adoption engineers of your below query who have advised the following:

*The companies position on this is that we must centralise treatment wherever we can.*

*Our guidance requires us to consider the whole life cost of the Treatment Works against more cost effective option like gravity to an existing public sewer or pumped solution. The Works need to be designed to accommodate flows from all existing properties in the developed area (this may be defined by the Local Plan) as well as any planned future growth. A pumped solution would need to be investigated in the first instance. Only in circumstances where its technically not possible or where there is a financial case for building a new Works over a pumped system would we start to consider a Works.*

I trust the above makes sense however please let me know if you have any queries following this.

Best regards,

Jake MacMillan
Development Planning Officer | Developer Services
Dŵr Cymru Welsh Water

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From: Tommy Thompson <tommy.thompson@adeptcsce.com>
Sent: Wednesday, January 3, 2024 8:40 AM
To: Jake MacMillan <Jake.MacMillan@dwrcymru.com>
Cc: Richard Parker <richard.parker@adeptcsce.com>
Subject: RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

******** External Mail ********
Good morning Jake,

Happy New Year.

The final numbers for the first phase have not been fixed yet and the current masterplan shows a total of 900 units to be developed across the whole site.

Further to this Wrexham council have approved the scheme which is now a formal allocation within their Local Development Plan, and I am looking at options for the disposal of the foul drainage.

Based on 4000litres per day it is anticipated that the 900 units will generate a peak foul flow of approximately 41.67l/s.
Ideally this will drain primarily via gravity into the existing 1050dia Welsh Water combined sewer which splits the site, with catchment along the eastern boundary requiring pumping. However, I accept this will be dictated by the findings of the capacity assessment currently being undertaken by yourselves and by timescales for any improvement works needed to the WW network to facilitate the development.

I am also looking into the feasibility of providing an on-site foul treatment works to service the development. Due to the size of the development, package treatment plants are not suitable so a larger rotary system will need to be employed.
Is this something WW would consider for adoption and if so, can you confirm any specific requirements which will be needed by yourselves to allow adoption of the treatment works?

Happy to set up a meeting or to discuss this over the phone.

Regards,

**Tommy Thompson** **IEng, MICE**
Associate Civil Engineer

**Adept Civil and Structural Consulting Engineers**

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From: Jake MacMillan <Jake.MacMillan@dwrcymru.com>
Sent: Tuesday, December 19, 2023 9:51 AM
To: Tommy Thompson <tommy.thompson@adeptcsce.com>
Cc: Neil Brown <neil.brown@adeptcsce.com>; Andrew Laird <andrew.laird@adeptcsce.com>; Michael Brown <MBrown@harworthgroup.com>; Richard Parker <richard.parker@adeptcsce.com>
Subject: RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

Hi Tommy,

Thank you for this, initially it was a first phase of 425 units, with a total of 1100 units. Are you now proposing a total of 900 units in one phase?

Best regards,

Jake MacMillan
Development Planning Officer | Developer Services
Dŵr Cymru Welsh Water

T: 0800 917 2652 | E: 45xxx | M: 07557860559
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From: Tommy Thompson <tommy.thompson@adeptcsce.com>
Sent: Monday, December 18, 2023 4:33 PM
To: Jake MacMillan <Jake.MacMillan@dwrcymru.com>
Cc: Neil Brown <neil.brown@adeptcsce.com>; Andrew Laird <andrew.laird@adeptcsce.com>; Michael Brown <MBrown@harworthgroup.com>; Richard Parker <richard.parker@adeptcsce.com>
Subject: RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

******** External Mail ********
Good afternoon Jake,

Thank you for the update on this.

For your information, the strategy and phasing for the site has been updated.
We now intend to bring forward 900 units for the development, I believe when Welsh Water were commissioned with doing the capacity assessment if was based on a first phase of 400 units.
While I don't believe this change in strategy will alter the assessment of the existing network being done by yourselves, I thought I would provide an update as a courtesy so Welsh Water are aware of our intentions for the site.

Please let me know if you have any queries or need any further information.

Regards,

**Tommy Thompson** **IEng, MICE**
Associate Civil Engineer
**Adept Civil and Structural Consulting Engineers**

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From: Jake MacMillan <Jake.MacMillan@dwrcymru.com>
Sent: Friday, December 15, 2023 12:28 PM
To: Andrew Laird <andrew.laird@adeptcsce.com>; Michael Brown <MBrown@harworthgroup.com>; Richard Parker <richard.parker@adeptcsce.com>
Cc: Neil Brown <neil.brown@adeptcsce.com>; Tommy Thompson <tommy.thompson@adeptcsce.com>
Subject: RE: [Hydrock: 17232-SMAN] Cefn Park, Wrexham - Pre Planning Enquiry Response

Hi Andrew,

Thanks for touching base, in terms of surveys on this one I'm told that these are ongoing as expected, I will put a note in to our modellers to check everything is up to date and let you know when I hear back.

Best regards,

Jake MacMillan
Development Planning Officer | Developer Services
Dŵr Cymru Welsh Water

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