

Wrexham County Council
16 Lord Street
Wrexham
LL11 1LG

Date: 20/11/2019
Our Ref: PLA0045842
Your Ref: SAB/FULL/2019/1005

Dear Sir,

Grid Ref: SJ332563 333393 356298

Site: Straight Mile, Llay, Wrexham

Development: SAB - Construction of a food store with associated car park, servicing and landscaping

We refer to your planning consultation relating to the above site, and we can provide the following comments in respect to the proposed development.

We would request that if you are minded to grant Planning Consent for the above development that the **Conditions and Advisory Notes** provided below are included within the consent to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets.

APPRAISAL

As a statutory consultee, we welcome the opportunity to comment on this SAB application for surface water drainage proposals at Straight Mile, Llay, Wrexham, in accordance with Schedule 3 of the Flood & Water Management Act 2010. Our comments are provided in response to the hierarchy (S1) and fixed standards (S2 – S6), as highlighted in the Welsh Government 'Statutory standards for sustainable drainage systems', and on the basis of information provided by the SAB application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.

Standard S1 – Surface Water Runoff Destination

As a hierarchy standard, we acknowledge that S1 provides an assessment on the choice of runoff destination by way of 5 Levels with the most preferred level represented by Priority Level 1, and movement from Level 1 to lower levels determined by demonstration that the exception criteria apply. This standard highlights that discharges to sewerage systems must be limited where possible and that Priority Levels 4 and 5 should only be used in exceptional circumstances. Accordingly, we offer the following comments to each of the 5 Levels:

Priority Level 1: Collected for use

The submitted application form, and accompanying [Strategy], indicates that the applicants have investigated use of rainwater harvesting to collect surface water flows and concluded that this runoff destination would be unviable. Having regard to the [Strategy], we acknowledge that the requirement for reusing water would preclude the use of rainwater harvesting and therefore accept that this runoff destination has been suitably investigated and discounted.

Priority Level 2: Infiltrated to Ground

The submitted application form, and accompanying report, indicates that the applicants have investigated use of soakaway systems and concluded that this runoff destination would be unviable. Having regard to the [Drawing/Report/Strategy], we acknowledge that [issue – e.g. unacceptable percolation values] would preclude the use of soakaway systems and therefore accept that this runoff destination has been suitably investigated and discounted.

Priority Level 3: Discharged to a Surface Water Body

The submitted application form, and accompanying strategy, indicates that the applicants have investigated discharging to a surface water body and concluded that this runoff destination would be unviable. Having regard to the [Strategy], we acknowledge the distance to nearest surface water body would preclude the discharge to a surface water body soakaway systems and therefore accept that this runoff destination has been suitably investigated and discounted.

Priority Level 4: Discharged to a Surface Water Sewer, Highway Drain, or another Drainage System

The submitted application form, and accompanying (Strategy), indicates proposals to discharge surface water flows into a private surface water sewer at a discharge rate of 5.4 l/s and in principle we offer no objection subject to consultation with the [Local Highways Authority as the regulatory body / riparian owner of this drainage system].

Priority Level 5: Discharged to a Combined Sewer

We acknowledge that the application does not propose to discharge surface water flows into a combined sewer.

Standard S2 – Surface Water Runoff Hydraulic Control

We acknowledge that the aim of Standard S2 is to manage the surface water runoff from and on site in order to prevent any morphological damage and flooding risk, up to a suitable return period, in the interests of protecting public health.

The submitted application form, and accompanying (Strategy), indicates proposals to discharge surface water flows into a private surface water sewer (to become a public asset) at a discharge rate of 5.4 l/s and



in principle we offer no objection subject to consultation with the [Local Highways Authority as the regulatory body / riparian owner of this drainage system].

Standard S3 – Water Quality

We acknowledge that the aim of Standard S3 is to minimise the potential pollution risk posed by the surface water runoff to the receiving water body.

The submitted application form, and accompanying (Strategy), indicates proposals to discharge surface water flows into a private surface water sewer (to become a public asset) at a discharge rate of 5.4 l/sand in principle we offer no objection subject to consultation with the [Local Highways Authority as the regulatory body / riparian owner of this drainage system].

Standard S4 – Amenity

We acknowledge that the aim of Standard S4 is to ensure that, where possible, the design of SuDS enhance the provision of high quality, attractive public space which contribute to health and wellbeing, liveability for local communities, and improving climate resilience.

The submitted application form, and accompanying (Strategy), indicates proposals to discharge surface water flows into a private surface water sewer (to become a public asset) at a discharge rate of 5.4 l/sand in principle we offer no objection subject to consultation with the [Local Highways Authority as the regulatory body / riparian owner of this drainage system].

Standard S5 – Biodiversity

We acknowledge that the aim of Standard S5 is to ensure the design of SuDS create rich ecological corridors and enrich biodiversity value to its maximum potential.

The submitted application form, and accompanying (Strategy), indicates proposals to discharge surface water flows into a private surface water sewer (to become a public asset) at a discharge rate of 5.4 l/sand in principle we offer no objection subject to consultation with the [Local Highways Authority as the regulatory body / riparian owner of this drainage system].

Standard S6 – Design

We acknowledge that the aim of Standard S6 is to ensure the design of surface water drainage systems are robust, can be easily and safely constructed, maintained and operated, to minimise impacts on the environment and natural resources.

The submitted application form, and accompanying (Strategy), indicates proposals to discharge surface water flows into a private surface water sewer (to become a public asset) at a discharge rate of 5.4 l/sand in principle we offer no objection subject to consultation with the [Local Highways Authority as the



regulatory body / riparian owner of this drainage system].

CONCLUSION

Having regard to our appraisal for each of the standards (S1 – S6), as highlighted in the Welsh Government 'Statutory standards for sustainable drainage systems', we offer no objection in principle to the SuDS proposals, on the basis of information provided by the SAB application. Accordingly, if you are minded to grant SAB Consent for this application, we would request that the following Condition(s) and Advisory Notes are included within the consent to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets:

Condition(s)

Surface water flows from the development shall only connect with the currently private surface water sewer that will become a public surface water sewer at manhole reference SJ33564301 as indicated on the extract of the Sewerage Network Plan attached to this decision notice. The connection shall be made through an attenuation device that discharges at a rate not exceeding 5.4 l/s.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

Advisory Notes

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com.

Our response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.



If you have any queries please contact the undersigned on 0800 917 2652 or via email at developer.services@dwrcymru.com

Please quote our reference number in all communications and correspondence.

Yours faithfully,

Rhodri Perry
Development Control Officer
Developer Services



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.