

Wrexham County Council
16 Lord Street
Wrexham
LL11 1LG

Date: 19/12/2019
Our Ref: PLA0046438
Your Ref: SAB/FUL/2019/1004

Dear Sir,

Grid Ref: SJ272428 327220 342845

Site: Towers Nursery Garage, Tower Hill, Wrexham

Development: SAB - Erection of one garage building including office space and welfare facilities and parking

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

APPRAISAL

As a statutory consultee, we welcome the opportunity to comment on this SAB application for surface water drainage proposals at [Towers Nursery Garage], 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 report, 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 report we acknowledge that the lack of surface water created 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 proposals to discharge surface water flows into a soakaway system. In principle we offer no objection subject to consultation with the [Building Regulations Authority / Approved Building Inspector] as the regulatory body.

Priority Level 3: Discharged to a Surface Water Body

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

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

We acknowledge that the application does not propose to discharge surface water flows into a surface water sewer, highway drain or another 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.

As above, we offer no objection to proposals for disposal of surface water flows into a soakaway system subject to consultation and an agreement with the [Building Regulations Authority / Approved Building Inspector / Natural Resources Wales / Lead Local Flood Authority] as the regulatory body.



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.

As above, we offer no objection to proposals for disposal of surface water flows into a soakaway system subject to consultation and an agreement with the [Building Regulations Authority / Approved Building Inspector / Natural Resources Wales / Lead Local Flood Authority] as the regulatory body.

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.

As above, we offer no objection to proposals for disposal of surface water flows into a soakaway system subject to consultation and an agreement with the [Building Regulations Authority / Approved Building Inspector / Natural Resources Wales / Lead Local Flood Authority] as the regulatory body.

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.

As above, we offer no objection to proposals for disposal of surface water flows into a soakaway system subject to consultation and an agreement with the [Building Regulations Authority / Approved Building Inspector / Natural Resources Wales / Lead Local Flood Authority] as the regulatory body.

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 proposed development site is crossed by a public 150mm combined sewer, please see copy of indicative public sewer record attached. No operational development is to take place within 3 metres either side of the centreline of the public sewer. We request that prior to commencing any operational development the location of this asset is determined. If operational development is likely to commence within 3 metres either side of the centreline of the sewer please stop works and contact us. This asset may be able to be diverted under Section 185 of the Water Industry Act 1991.



As above, we offer no objection to proposals for disposal of surface water flows into a soakaway system subject to consultation and an agreement with the [Building Regulations Authority / Approved Building Inspector / Natural Resources Wales / Lead Local Flood Authority] as the regulatory body.

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)

No surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage network.

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 proposed development site is crossed by public sewers with the approximate position being marked on the attached Statutory Public Sewer Record. The positions shall be accurately located, marked out on site before works commence and no operational development shall be carried out within a specified easement zone either side of the centreline of the public sewers. The applicant is advised to contact Welsh Water to discuss.

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 now 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

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 to establish the location and status of the apparatus.



Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

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



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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

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