

Wrexham County Council
16 Lord Street
Wrexham
LL11 1LG

Date: 02/10/2019
Our Ref: PLA0044890
Your Ref: SAB/FUL/2019/0702

Dear Sir,

Site: Gwynant, Plas Madoc, Acrefair, Wrexham
Development: SAB consultation - 4 semi detached, 3 detached & 4 flats

APPRAISAL

As a statutory consultee, we welcome the opportunity to comment on this SAB application for surface water drainage proposals at Gwynant, Plas Madoc 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 Drawing/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 Cost constraints 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/infiltration testing, indicates that the applicants have investigated use of soakaway systems and concluded that this runoff destination would be unviable. Having regard to the Report/infiltration testing, we acknowledge that the ground porosity 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 Report, indicates that the applicants have investigated discharge into a surface water body and concluded that this runoff destination would be unviable. Having regard to the Report, we acknowledge that there is not a water body within the vicinity of the site would preclude discharge to a surface water body 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 Drawing/Report, indicates proposals to discharge surface water flows into the public surface water sewer. Having regard to our assessment of other runoff destinations (Priority Levels 1 – 3), we acknowledge and accept that the applicants have explored and exhausted alternative surface water drainage options. Therefore, subject to recommended condition(s) highlighted below (see Conclusion), we offer no objection in principle to the communication of surface water flows into the public surface water sewer.

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.

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.

2. Standard S1: Priority Level 4

In principle we offer no objection to the discharge of surface water from the development site at a rate not exceeding 5 l/s into public surface water sewer.



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.

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.

2. Standard S1: Priority Level 4

In principle we offer no objection to the discharge of surface water from the development site at a rate not exceeding 5 l/s into public surface water sewer.

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.

2. Standard S1: Priority Level 4

In principle we offer no objection to the discharge of surface water from the development site at a rate not exceeding 5 l/s into public surface water sewer.

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.

2. Standard S1: Priority Level 4

In principle we offer no objection to the discharge of surface water from the development site at a rate not exceeding 5 l/s into public surface water sewer.

The proposed development is crossed by a number of public sewer assets, please see copy of indicative public sewer record attached. No operational development is to take place within 3 metres either side of 100mm & 150mm foul water only sewers, 100mm surface water sewer, 150mm surface water sewer, 300mm surface water sewer and 450mm surface water sewer and 225mm combined sewer. We request that prior to commencing any operational development the location of these assets are determined. If operational development is likely to commence within 3 metres either side of the centreline of any of the assets please stop works and contact us. These assets may be able to be diverted under Section 185 of the Water Industry act 1991



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 public surface water sewer between manhole reference number SJ28438205 and SJ28438145 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 l/s.

Advisory Notes

Please note that this SAB consent relates solely to the approval of SuDS components. In order to establish whether the proposed development benefits from consent, the applicant is advised to refer to the planning permission granted as well as any conditions in reference to foul water drainage. In accordance with the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 Dwr Cymru Welsh Water is a statutory consultee to the planning process and will provide comments to any proposals for foul water drainage by response to a planning application consultation.

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

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 Dwr 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.