

Merthyr Tydfil County Council
The Planning Division
Unit 5 Triangle Business Park
Pentrebach
Merthyr Tydfil
CF48 4TQ

Date: 15th July 2020
Our Ref: PLA0047449
Your Ref: P/20/0025

Dear Sirs,

Site: Former Ardagh Site, Dragon Parc, Abercanaid

Development: Engineering works including provision of drainage channel / swale and culvert / outflow, raising the level of land and creation of site access road.

Further to our recent discussions and meeting on the 12th June 2020, we can provide the following comments in relation to the above planning application.

As you are aware the site is crossed by a 24" steel primary trunk water main and is of strategic importance to the supply of water in the area, both for domestic and commercial premises. It should be noted that this main feeds approximately 20,818.00 properties as well as 17 schools and 7 care homes. As the Statutory Water undertaker for the area, Welsh Water owns, operates, maintains, improves and extends the system of water mains and associated apparatus and has corresponding statutory duties for making available supplies of water. These principle responsibilities are set out under Section 37 of the Water Industry Act (WIA) 1991. I would also draw your attention to Section 159 of the WIA also relates to our powers of access to inspect, maintain, repair, alter and renew our assets to enable us to perform our Statutory Duties.

The proposed flood protection works detailed in the application would increase the levels by 1.2m above the existing levels. The reprofiling of levels would place additional loading on the watermain and increase the risk of asset failure. Owing to the amount of water that the asset conveys and the pressure it operates under (which is approximately 120mh or 12 bar), there is a significant risk to the safety and security of supply to residents, properties and the local environment if the asset were to fail.

At this juncture it should be clarified that the depth of the watermain has not been confirmed and you will be aware that we have engaged with the developer in order to establish its depth, which would be via the undertaking of trial holes and further investigatory work at the site. Notwithstanding this, and based on its anticipated depth of 4m, our calculations suggest that raising the levels would increase the vertical load from 4 Ton to approximately 5.3 Ton placing additional stress on the main and thus risk damage to it.

In addition, the increased cover will also impact on the complexity of undertaking any repair or maintenance work in future. It should also be noted that the increase in cover would result in the need for an increased working width should there be any requirement to expose the main in future (for repair/maintenance/inspection etc). This would result in the need for a greater protective zone either side of the main which would need to be fully considered as part of the final layout of the development proposed under planning application P/17/0144.

In light of our concerns relating to the additional load and increased difficulty in accessing the main to perform our Statutory Duties, we are currently unable to support this development without sight of the full impact on our strategic asset.

The presence of our asset has been raised as part of our previous planning responses to the development and we are in ongoing discussions with the developer regarding their proposals and the possibility of a solution being found to overcome our concerns. This includes discussions referred above regarding accurately locating the asset through the undertaking of trial holes, to better understand the relationship between the main and the proposed flood protection work. Alternatively, it may be possible to divert the main if the developer applies under Section 185 of the Water Industry Act.

Whilst these discussions have yet to conclude, should you be minded to grant planning consent we recommend that the following Condition is included to ensure the integrity of our watermain is protected and access to the asset is maintained. It should be clarified however that it is the Council's decision on whether the development is approved with this Condition in place. We cannot guarantee at this stage that our concerns will be overcome but are fully committed to continuing our engagement with the developer to agree a suitable solution.

Conditions

The proposed development site is crossed by a 24" diameter public strategic watermain. No development shall commence until the watermain has been accurately located and a detailed method statement and risk assessment for the protection of the structural condition of the watermain has been submitted to and approved in writing by the Local Planning Authority. The approved protection measures shall be implemented in full before any development hereby permitted has commenced and shall be retained at all times for the duration of the approved operations including the restoration works.

Reason: To ensure that the proposed development does not affect the integrity of the public water supply system in the interests of public health and safety.

I trust the above is helpful, should you have further queries however please contact myself or Rhys Evans who is our Development Control Manager on 0800 917 2652 or via email at developer.services@dwrcymru.com

Yours faithfully,

Maria Evans

Development Control Officer

Developer Services



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