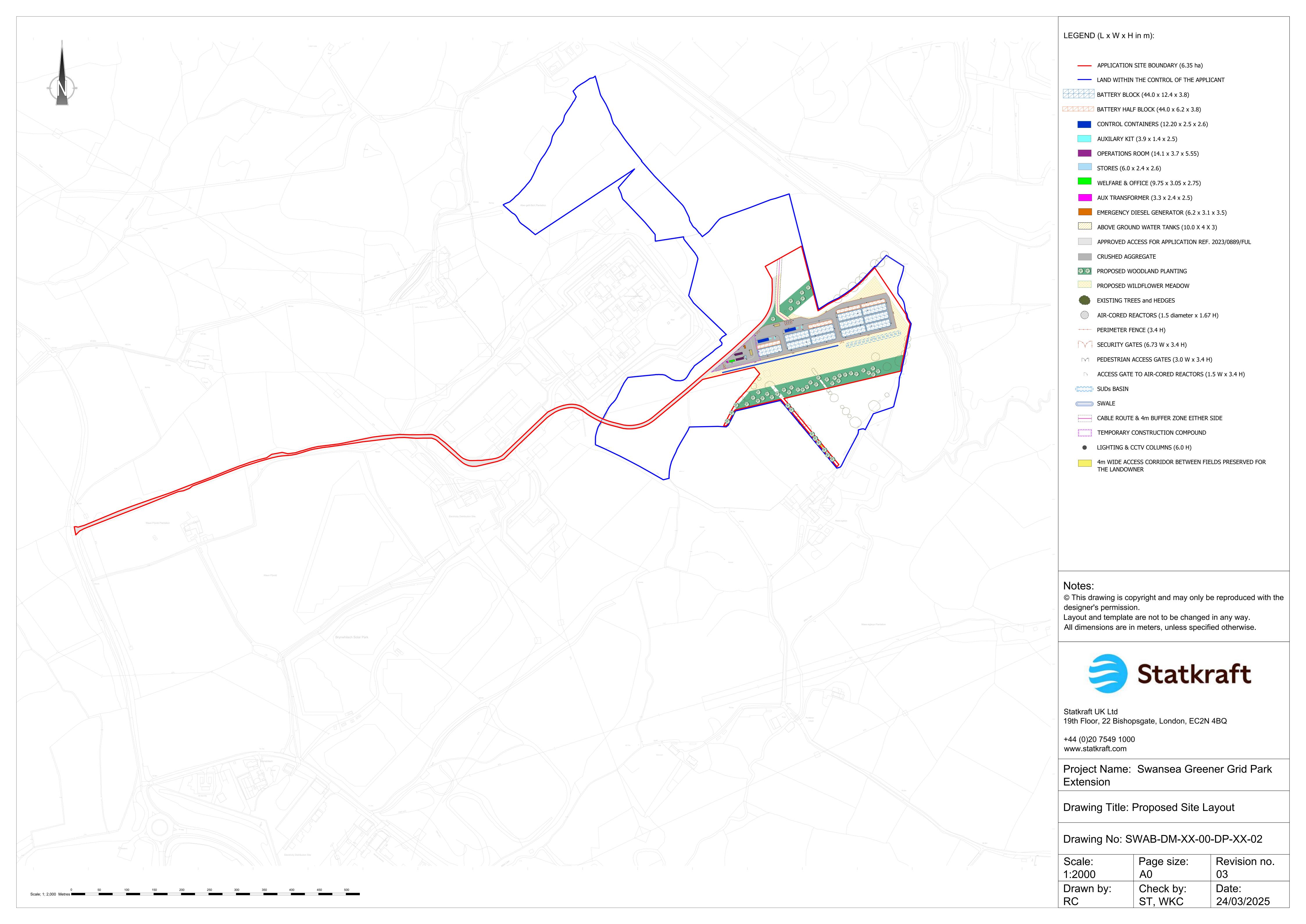
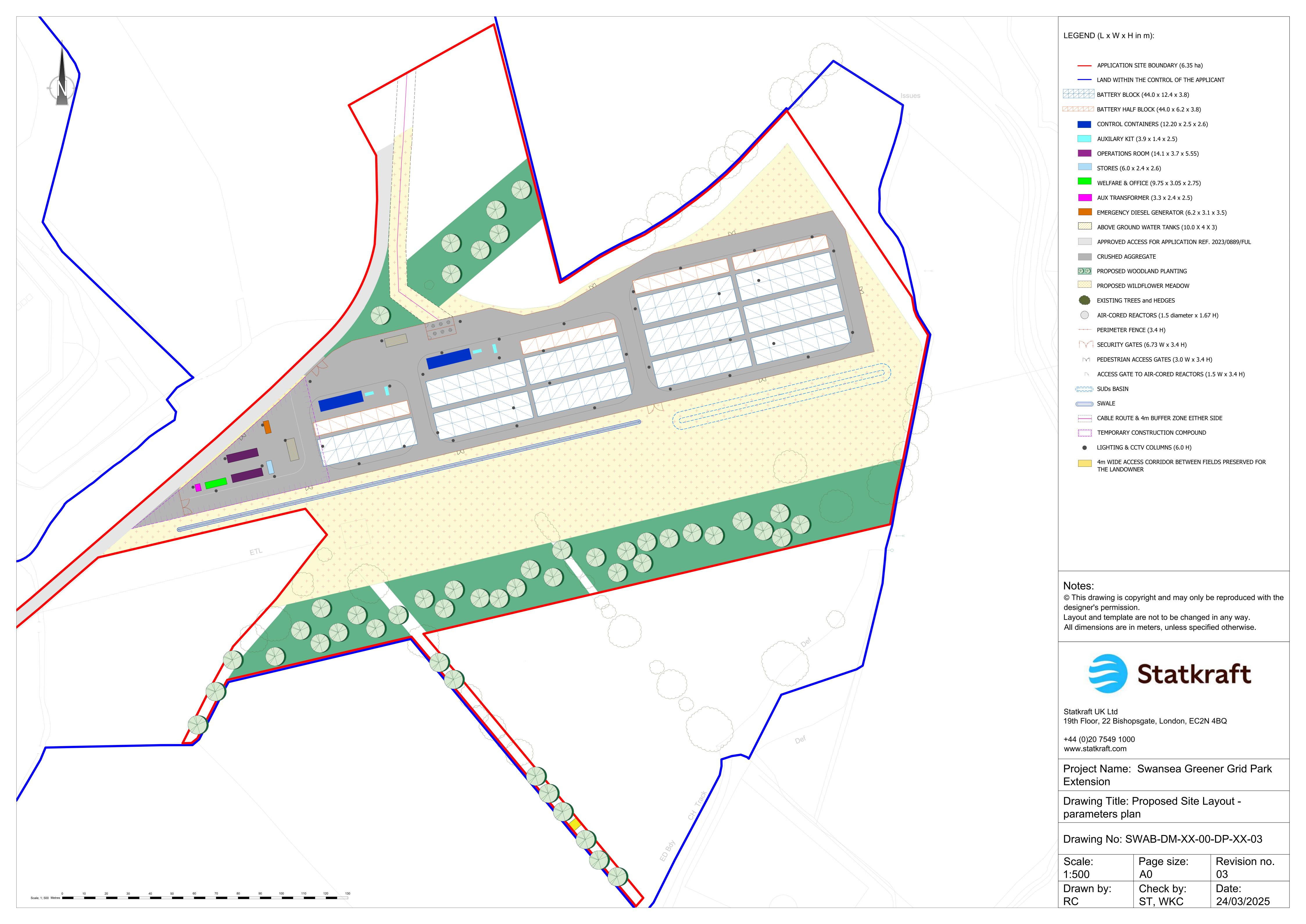
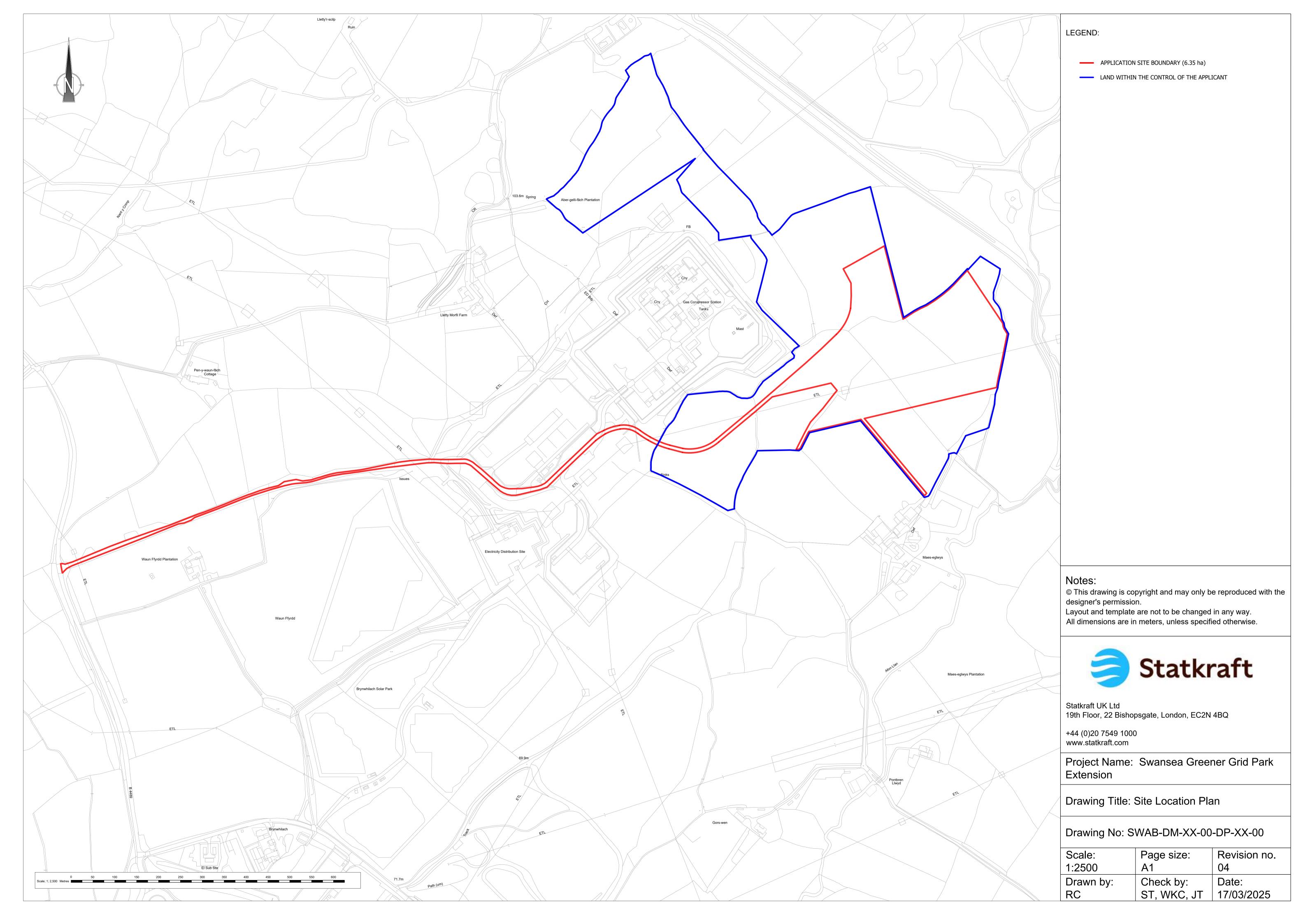


# **Appendix A**

Proposed Site Layout and Location Plans



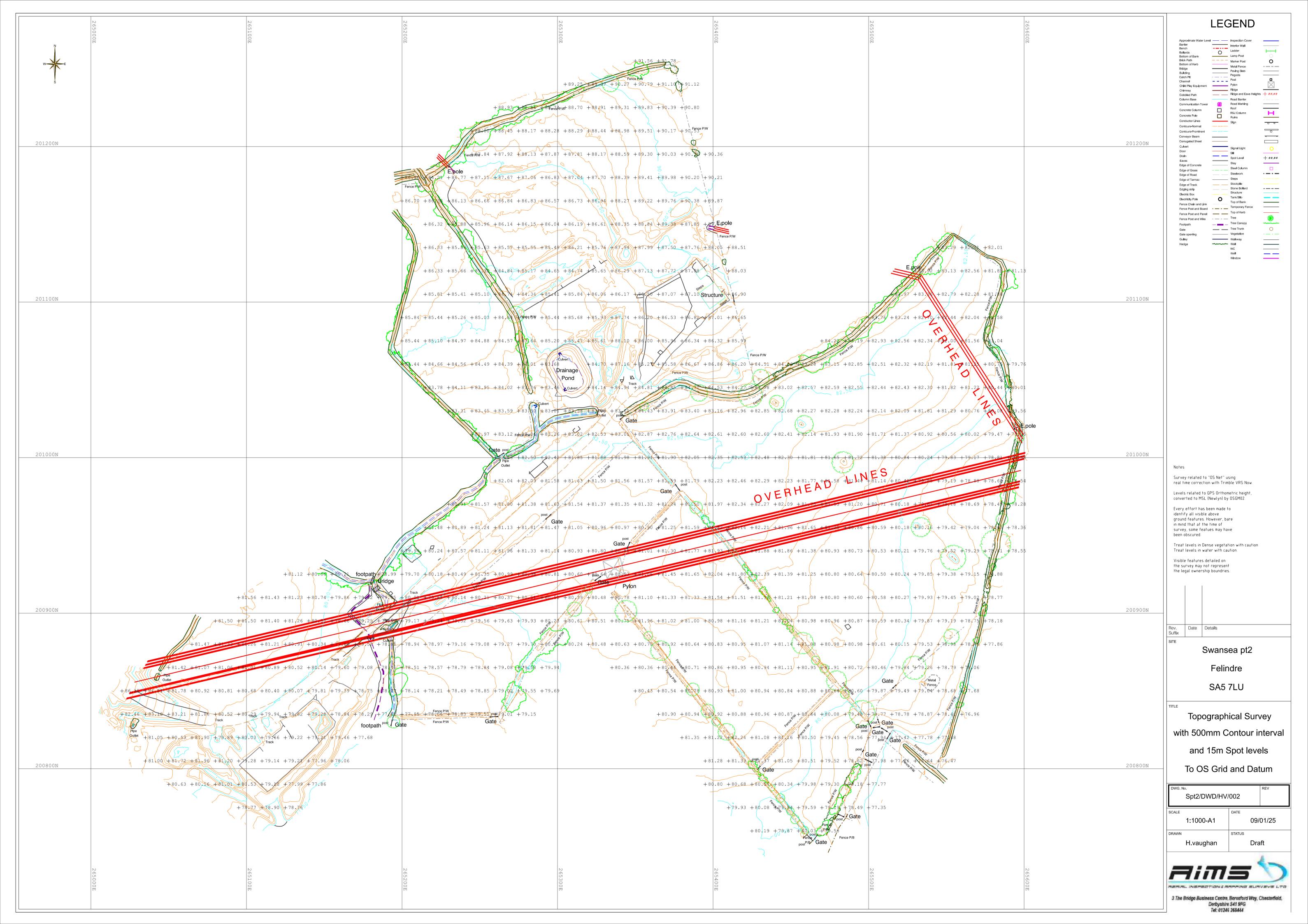


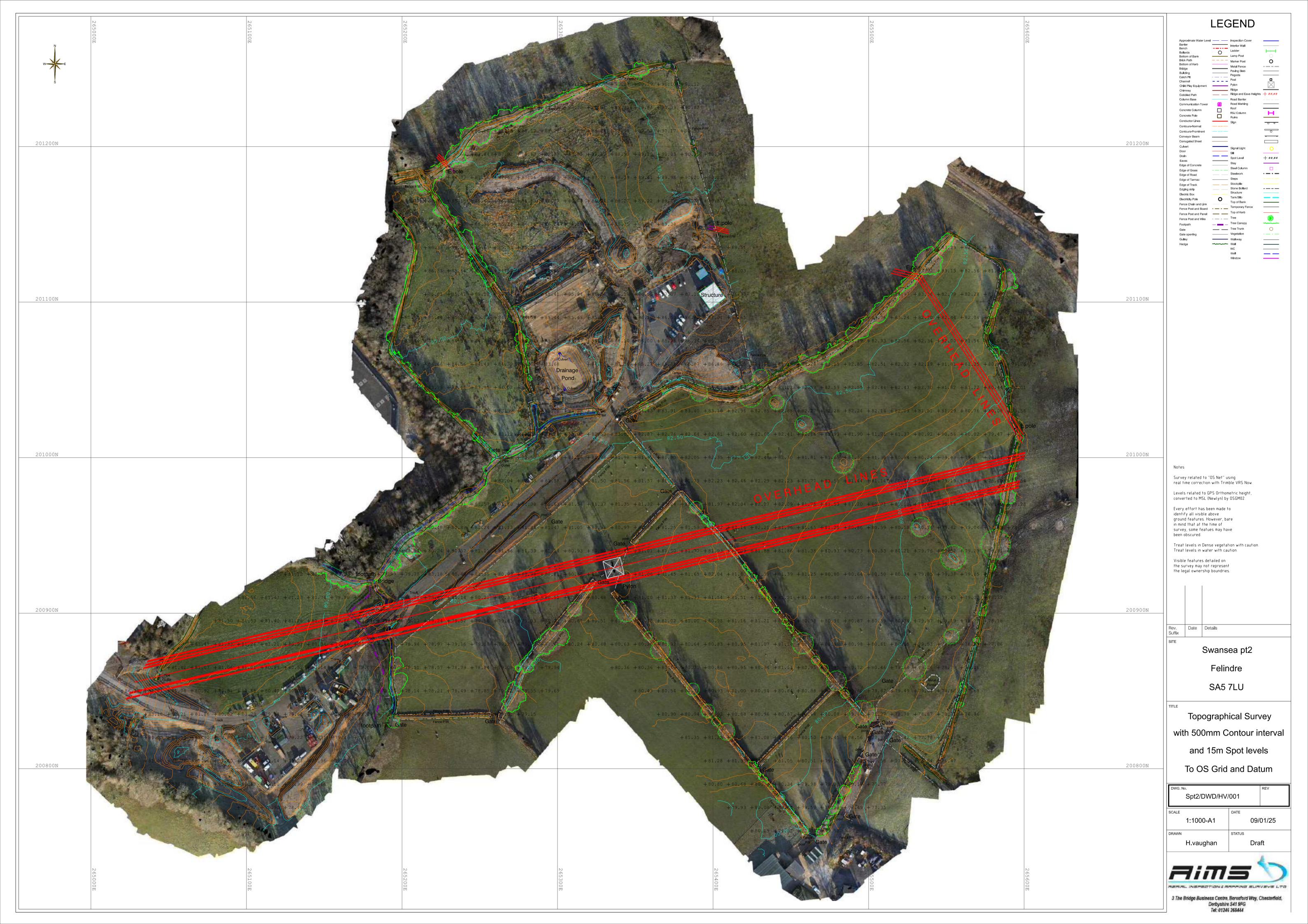




# **Appendix B**

Topographical Survey







# **Appendix C**

Dwr Cymru Welsh Water Pre Planning Response Letter and Gravel Vehicle Access Track V-Ditch Layout Approved as Part of SAB Application Referenced 2024/0015/SFA



**Developer Services** PO Box 3146 Cardiff CF30 0EH

Tel: +44 (0)800 917 2652 Fax: +44 (0)2920 740472

E.mail: developer.services@dwrcymru.com

Gwasanaethau Datblygu Blwch Post 3146 Caerdydd CF30 0EH

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E.bost: developer.services@dwrcymru.com

**DWD** 69 Carter Lane London EC4V 5EQ

> Date: 05/03/2025 Our Ref: PPA0009236

Dear Sir/Madam,

Grid Ref: 265313 200964

Site Address: Land west of Rhydypandy Road, Rhydypandy Road, Morriston Swansea

Development: 2D- The Proposed Development comprises the construction and operation of a BESS of

up to 100 megawatts ('MW') electrical capacity and associated infrastructure

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development.

## **APPRAISAL**

Firstly, we note that the proposal relates to the construction and operation of a BESS of up to 100 megawatts ('MW') electrical capacity on land west of Rhydypandy Road, Morriston and acknowledge that the site is allocated (Ref: EU1) within the Local Development Plan (LDP) for renewable and low energy carbon proposals. Accordingly, we offer the following comments as part of our appraisal of this development.

#### **PUBLIC SEWERAGE NETWORK**

There is no public sewerage system in this immediate locality and therefore any new development will require provision of satisfactory alternative facilities for sewage disposal. Alternatively, the site is located approximately 650m to the north-west of a public sewerage system that drains to Swansea Bay WwTW, and 750m to the north of a public sewerage system that drains to Gowerton WwTW. It may be possible for the Developer to requisition sewers from Dwr Cymru Welsh Water under Sections 98 - 101 of the Water Industry Act 1991.

You are 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 you may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus in and around your site.



Gymraeg neu yn Saesneg

Please be mindful that under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

### **SURFACE WATER DRAINAGE**

As of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. As highlighted in these standards, the developer is required to explore and fully exhaust all surface water drainage options in accordance with a hierarchy preferring infiltration (PL2) and, where infiltration is not possible, disposal to a surface water body (PL3), in liaison with the Lead Local Flood Authority and/or Natural Resources Wales, or surface water sewer or highway drain (PL4) in liaison with the riparian owner and/or Local Highways Authority. Please be advised that due to capacity constraints with the downstream public sewerage network, under no circumstances would we allow surface water runoff highway run-off from the proposed development to communicate directly or indirectly with the public combined sewerage system. Please note, no amount of land drainage run-off is permitted to discharge directly or indirectly into the public sewerage system.

Furthermore, Planning Policy Wales (PPW) acknowledges that discharge of surface water to foul sewers is prohibited and highlights that any additional surface water from new developments should not be discharged to combined systems because of the risk of pollution when combined systems overflow (Para 6.6.3). Moreover, PPW recognises the challenges faced from rainfall intensity causing surface water flooding and diffuse pollution (Para 6.6.14) along with the importance of well-maintained sewerage networks (Para 6.6.15), particularly as a result of run-off from built surfaces and the sewage discharges from overloaded sewers (Para 6.6.16).

In this instance, we acknowledge that the 'Flood Consequences Assessment and Drainage Strategy' indicates proposals to dispose surface water flows to a surface water body and, in principle, we offer no objection. It is therefore recommended that the developer consult with the City & County of Swansea Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please note, DCWW is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation.

Please refer to further detailed advice relating to surface water management included in our attached Advice & Guidance note and our Developer Services website at <a href="https://developers.dwrcymru.com/en/help-advice/regulation-to-be-aware-of/sustainable-drainage-systems">https://developers.dwrcymru.com/en/help-advice/regulation-to-be-aware-of/sustainable-drainage-systems</a>.

#### **FOUL WATER DRAINAGE**

It appears the application does not propose to connect foul water flows to the public sewerage system, and therefore Dwr Cymru Welsh Water has no further comments. However, should circumstances change and a connection to the public sewerage system/public sewage treatment works is preferred we must be re-consulted on this proposal.



### **POTABLE WATER SUPPLY**

We would advise that the proposed development site is crossed by various watermains, including a strategic asset in the form of a 66" trunk watermain. Notwithstanding this, we are aware of the development site proposals having been a statutory consultee as part of the original Development Consent Order (DCO) for 'Abergelli Power Gas Fired Generating Station' (2019 No. 1268) which appears to correspond to the development site boundary for this latest pre-application consultation. Accordingly, we would remind that the DCO for Abergelli Power is subject to protective provisions (Schedule 11(a) Part 5) in reference to the "clearance area" of watermains, including the 66" trunk main measured 25 metres either side of the centreline, as well as requirement 2.(6) which refers to details of the structure crossing the watermain:

2. (6) No part of numbered work 2 which is within 25 metres either side of the centre line of the 66 inch water main may commence until details of the structure for crossing the water main have been submitted to and approved in writing by the relevant planning authority in consultation with Dŵr Cymru Cyfyngedig.

With respect to this latest pre-application consultation, and the accompanying 'Proposed Site Layout' (Rev. 06), we acknowledge that the development site boundary is sited at a distance sufficiently set back from the 66" trunk main. However, we acknowledge that the development will be accessed via a new access road as per the 'Site Layout Plan' (Drawing No. STA005-PL-02) which is crossed by 4" and 225mm trunk watermain, with their approximate positions being marked on the attached Statutory Public Watermains Record. Accordingly, it may be necessary for the developer to enter into an asset protection agreement in relation to these crossings and we would recommend the contact us to discuss further.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at <a href="mailto:developer.services@dwrcymru.com">developer.services@dwrcymru.com</a>. Please quote our reference number in all communications and correspondence.

Yours faithfully,

Rhys Evans
Planning Liaison Manager
Developer Services

<u>Please Note</u> that demands upon the water and sewerage systems change continually; consequently, the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.

