

Appendix 8. Copy of correspondence issued to specialist consultees

From: [LRM Planning](#)
To: ["streetscene@newport.gov.uk"](mailto:streetscene@newport.gov.uk); ["developer.services@dwrcymru.com"](mailto:developer.services@dwrcymru.com);
["enquiries@naturalresourceswales.gov.uk"](mailto:enquiries@naturalresourceswales.gov.uk); ["Firesafety@southwales-fire.gov.uk"](mailto:Firesafety@southwales-fire.gov.uk)
Subject: Pre-Application Consultation: Land at Traston Lane, Newport
Date: 13 December 2024 13:17:53
Attachments: [241212 PAC Notice.pdf](#)

Dear Sir/Madam,

I am writing to you as a specialist consultee or adjoining landowner as defined by article 2(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, to serve the attached notice. This notice comprises a formal request for Pre-Application Consultation comments under article 2D of the Order as Modified by Article 2G.

This relates to a full planning application for a residential development comprising 26 affordable dwellings, new access works, landscape planting, a new pumping station, and associated works on land at Traston Lane, Newport, South Wales.

For transparency, this email is addressed to the following bodies/persons in accordance with the requirements listed in the table under schedule 4 of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016:

- **Newport Highways Authority** – as the development involves the formation of a new means of access to a highway; the development involves the creation of a new road; and as an adjoining landowner.
- **Dŵr Cymru Welsh Water** – as the water and sewerage undertaker concerned; and as the development involves new residential development.
- **Natural Resources Body for Wales** – as the site is within Flood Zone C1.
- **Fire and Rescue Authorities** – as the proposed development includes more than 10 dwellinghouses.

The formal notice attached provides information about the proposals, and gives details on how to view the draft planning application, which is now available for viewing on our website at www.lrmplanning.com, and includes drawings, draft planning application forms and draft Design & Access Statement, along with an array of other supporting documents.

To access this information, please follow the menu on the blue bar along the top of the webpage, click on 'Public Consultation', and then on '*Land at Trason Lane, Newport, South Wales*'.

The formal consultation begins on Friday 13th December and runs for 35 days until

17th January 2025. In accordance with the requirements of article 2E of the Order, any response you wish to make must be received by this date.

If you have any queries, please do not hesitate to contact me on the details provided below.

Kind regards,

Appendix 9. Response from Local Councillor James Peterson

From: [Peterson, James \(Elected Member\)](#)
To: [LRM Planning](#)
Subject: PAC Response Traston Lane Newport
Date: 17 January 2025 10:33:22

Hi,

I am writing to respond to the pre-planning application for Traston Lane, Newport, which proposes 26 units and a pump station. As a ward councillor living approximately 35 meters from the site on Traston Road, I must declare my proximity. However, I have been approached by numerous residents who have raised concerns after receiving your letter. To better understand their views, I visited homes around the site, including Traston Lane, Traston Road, and Traston Close. I encouraged residents to provide feedback directly to you.

In general, most residents are against the development, with only two expressing neutrality.

The primary concern is flooding, both surface and foul water.

Nearly all adjoining residents have highlighted that their gardens already flood during winter months. They fear that the development will exacerbate this issue by replacing natural drainage. The site is a green space that feeds into Great Spytty Reen, and replacing this with the proposed development will increase flooding. While the development includes surface water actions to meet SUDs requirements, such as ponds that will feed out of the site in the northwest corner, residents are worried. The ground on the site is being raised from 6.0m to 6.8m to allow drainage pipes to have a gradient fall. However, residents are concerned that raising the road will block the natural flow and create a taper from the high point of the site to the low point of Traston Lane, which is 5.84m. The drainage on the outer boundaries of the site does not seem to account for the existing drainage or the taper that will be created. Traston Lane is not an adopted highway and relies on natural drainage for their flood defence, as do the private gardens that back onto the site. Additionally, a large proportion of the boundary vegetation, which absorbs water and serves as a flood defence, is proposed to be removed.

Another major concern is the sewer system's capacity to handle an additional 26 properties and a pump station. The properties on Traston Lane are over 100 years old, with the lowest finished floor levels on the estate and ground-level toilets. In recent years, residents have experienced toilet overflows into the ground floor. They believe that the additional pressure on the sewer network will increase these events, disproportionately affecting them due to their location at the lowest point of the estate.

The proposed pump station has also raised concerns among nearby residents. It is proposed to be placed 10 meters from existing properties, raising issues about noise, smells, and unsightliness. While the pump station may meet specifications when installed, residents are concerned that over time, issues will arise, requiring their time and resources to rectify. The plans do not clearly show how or where the pump station will connect to the existing public sewer.

Traffic impact is another concern. The existing estate comprises about 100 properties, and an additional 26 properties represent a 25% increase in traffic on Traston Road. The highway is already showing signs of deterioration. Residents worry that the initial development, with lorries delivering supplies, will accelerate this deterioration and increase potholes, as the road is limited to 7.5-ton vehicles except for access. The continued traffic from new homes after development will exacerbate this issue. Furthermore, Nash Road outside the high school and college can get heavily congested, and additional traffic will worsen this congestion and its negative impacts. The plans also mention access through Traston Lane, but as it is a private lane and not an adopted highway, permission would be required to use this entrance.

Concerns were also raised about the 400-year-old oak trees on the site and the root protection area (RPA) necessary to maintain the tree's health. The exact measurements for the RPA seem

inconsistent across different drawings. Specific concerns include:

1. Excavation: Digging into the soil to lay foundations or trenches is likely to damage roots, such as those of boundary fences/walls.
2. Soil Compaction: Parking vehicles, storing heavy materials, or operating machinery within the RPA can compact the soil and harm root systems.
3. Changes to Ground Levels: Raising or lowering the soil level disrupts the tree's access to oxygen, water, and nutrients.
4. Impermeable Surfaces: Installing asphalt, concrete, or other impermeable materials directly over roots prevents water and air from reaching them.

Residents are also worried about the devaluation of their properties due to affordable housing being put on the site. Although research shows that affordable housing does not negatively affect house prices in the long term, residents fear short-term impacts. Combined with the above concerns, some residents feel that this development will trap them in their current properties. A few residents reported that they bought their properties because they are on a private estate. If they choose to move due to this development, they believe they would not get the current market value and would have to move to a lower-standard property on another private estate.

These are a brief summary of the concerns shared with me as a councillor. While I support these concerns, I am aware that not all of them fall under your responsibilities. However, the impact on other authorities through this development affects residents' day-to-day lives.

I am happy to discuss further if you would like more details.

Kind regards,
Cllr James Peterson

Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg, Saesneg neu yn y ddwy iaith. Byddwn yn cyfathrebu â chi yn ôl eich dewis. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

The Council welcomes correspondence in English or Welsh or both, and will respond to you according to your preference. Corresponding in Welsh will not lead to delay.

Disclaimer/Ymwadiad

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When you email Newport City Council, you consent to the Council monitoring and reading any such emails for the purposes of security and legislative compliance. For the full disclaimer please access <http://www.newport.gov.uk/disclaimer>.

Mae'r e-bost hwn yn cynnwys gwybodaeth y bwriedir ar gyfer y derbynydd yn unig a gall fod yn gyfrinachol, yn destun ragorffraint gyfreithiol neu broffesiynol, neu fel arall wedi'i diogelu rhag cael ei rhyddhau. Os nad chi yw derbynydd bwriadedig y neges hon, a fyddochystal â rhoi gwybod i'r anfonwr ar unwaith a pheidio â datgelu, dosbarthu neu gopïo'r e-bost i unrhyw barti arall. Mae'r e-bost hon ac unrhyw ffeiliau atodedig yn eiddo i Gyngor Dinas Casnewydd.

Pan fyddwch yn anfon e-bost at Gyngor Dinas Casnewydd, rydych yn cydsynio i'r Cyngor fonitro a darllen unrhyw e-byst o'r fath at ddibenion cydymffurfio â diogelwch ac â deddfwriaeth. I weld yr ymwadiad llawn ewch i <http://www.newport.gov.uk/ymwadiad>

Appendix 10. Responses from Dŵr Cymru Welsh Water, South Wales Fire and Rescue Service, and Natural Resources Wales

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

Ffôn: +44 (0)800 917 2652
Ffacs: +44 (0)2920 740472
E.bost: developer.services@dwrcymru.com

LRM Planning
22 Cathedral Road,
Cardiff,
Cardiff,
CF11 9LJ

Date: 02/01/2025
Our Ref: PPA0009140

Dear LRM Planning,

Grid Ref: 333718 186339

Site Address: Land to the rear of Traston Close and Traston Lane, Newport

Development: 2D- Full planning application for a residential development comprising 26 affordable dwellings, new access works, landscape planting, a new pumping station, and associated works.

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.

Firstly, we note that the proposal relates to 26 new residential dwellings at Lighthouse Walk, Traston Lane, Newport and acknowledge that the site is allocated within the Local Development Plan (LDP). In reference to our representations during the LDP consultation process, namely the 'Statement of Common Ground', we can confirm that an assessment has been undertaken of the public sewerage and watermains systems to accommodate 26 No. of Units and informs our appraisal as follows.

Public Sewerage Network

The proposed development site is located in vicinity of a separate sewerage system, comprising, foul and surface water public sewers, which drains to Nash Wastewater Treatment Works (WwTW) via Liswerry Sewerage Pumping Station (SPS).

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



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.

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).

It is therefore recommended that the developer consult with Newport City 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 <https://developers.dwrcymru.com/en/help-advice/regulation-to-be-aware-of/sustainable-drainage-systems>

Foul Water Drainage – Sewerage Network

We have considered the impact of foul flows generated by the proposed development and concluded that flows can be accommodated within the public sewerage system. We advise that the flows should be connected to the foul sewer at or downstream of manhole and ST33869409 located in the road to the Northeast.

Should a planning application be submitted for this development we will seek to control these points of communication via appropriate planning conditions and therefore recommend that any drainage layout or strategy submitted as part of your application takes this into account. However, should you wish for an alternative connection point to be considered please provide further information to us in the form of a drainage strategy, preferably in advance of a planning application being submitted.



You may need to apply to Dwr Cymru Welsh Water for any connection to the public sewer under Section 106 of the Water industry Act 1991. However, 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 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

Sewage Treatment

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

Water Supply

We anticipate this development will require the installation of a new single water connection to serve the new premise. The provisions of Section 45 of the Water industry Act 1991 apply. We therefore rely on the Local Planning Authority to control the delivery of any required reinforcement or offsite works by way of planning condition at planning application stage.

Capacity is currently available in the water supply system to accommodate the development. Initial indications are that a connection can be made from the 3" diameter SI watermain off Traston Rd. We reserve the right however to reassess our position at planning application stage to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.

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 developer.services@dwrcymru.com



Please quote our reference number in all communications and correspondence.

Yours faithfully,

Rhys Evans
Planning Liaison Manager
Developer Services

Please Note 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.



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

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
















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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.



LEGEND (Representative of most common features)

	Foul chamber		Outfall
	Surface water chamber		Lamphole
	Combined chamber		Storm Overflow
	Combined sewer overflow		Rising main
	Special purpose chamber		Gravity sewer
	Treatment works		Private sewer
	Pumping station		Private sewer subject to Sect. 104 adoption agreement
NB: Sewer symbol colour indicates the type:			Private Sewer Transfer
RED	- Combined		Lateral Drain
GREEN	- Surface Water		Inspection Chamber
BROWN	- Foul		
Purple	- Former S24 sewers (for indicative purposes only)		

Notes:

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be asbestos cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation.

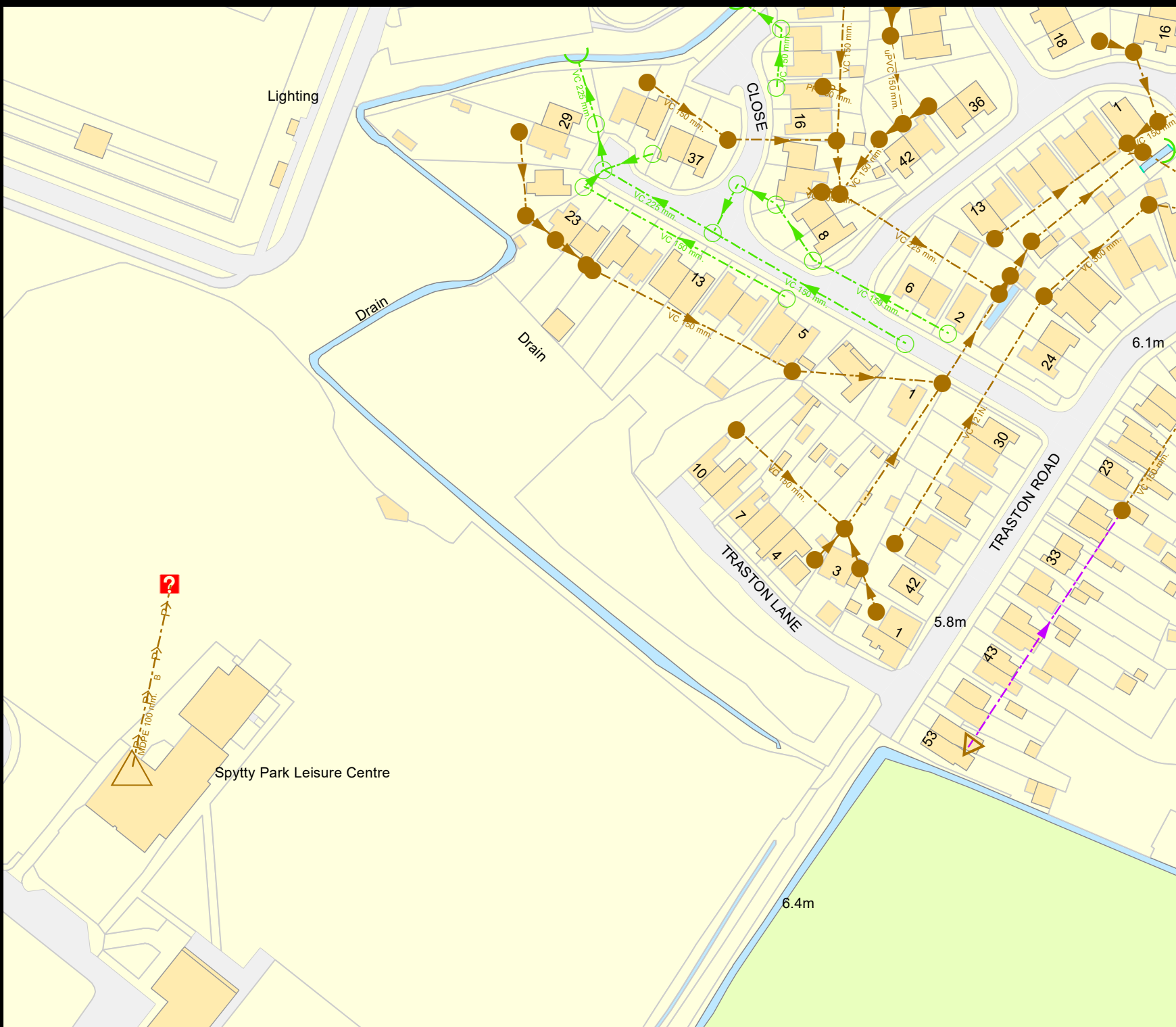
Dŵr Cymru Cynnydd (the Company) gives this information as to the position of its underground apparatus by way of general guidance only and on the understanding that it is based on the best information available and its warranty as to its correctness is relied upon in the event of excavations or other works made in the vicinity of the company's apparatus. This level of service is subject to the terms and conditions of any excavation or other works which are supplied by the Company, as shown in accordance with statutory requirements of sections 105 and 109 of the Water Industry Act 1991 which leaves open the level of information available, and, in particular, but without prejudice to the generality of the foregoing, it should be noted that the records that are available to the Company may not disclose the existence of a water main, service pipe, sewer, lateral drain or other apparatus and any associated apparatus, and before September 1995, or if they do, the particular detail recording the position, construction and/or material of the apparatus. It is understood that the furnishing of this information is solely without prejudice to the provisions of the New Roads and Street Works Act 1991 and the Company's rights to be compensated for any claims in its appearance.

Service pipes are not generally shown but their presence should be anticipated.

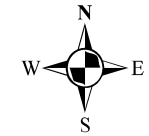
EXACT LOCATIONS OF ALL APPARATUS TO BE DETERMINED ON SITE.

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Map Ref: 333720,186332
 Map scale: 1:1500
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PPA0009140



LEGEND

- | | | | |
|--|-------------------------|--|-----------------------|
| | Sluice valve | | Water Treatment Works |
| | Pressure reducing valve | | Water Pumping Station |
| | Meter | | Existing main |
| | Bulk meter | | Non-operational main |
| | Hydrant | | Raw Water |
| | Cap end | | |
| | Air valve | | |
- NB: Water main symbol colour indicates the type.
 LIGHT BLUE - Trunk
 DARK BLUE - Distribution
 YELLOW - Raw Water

Notes:

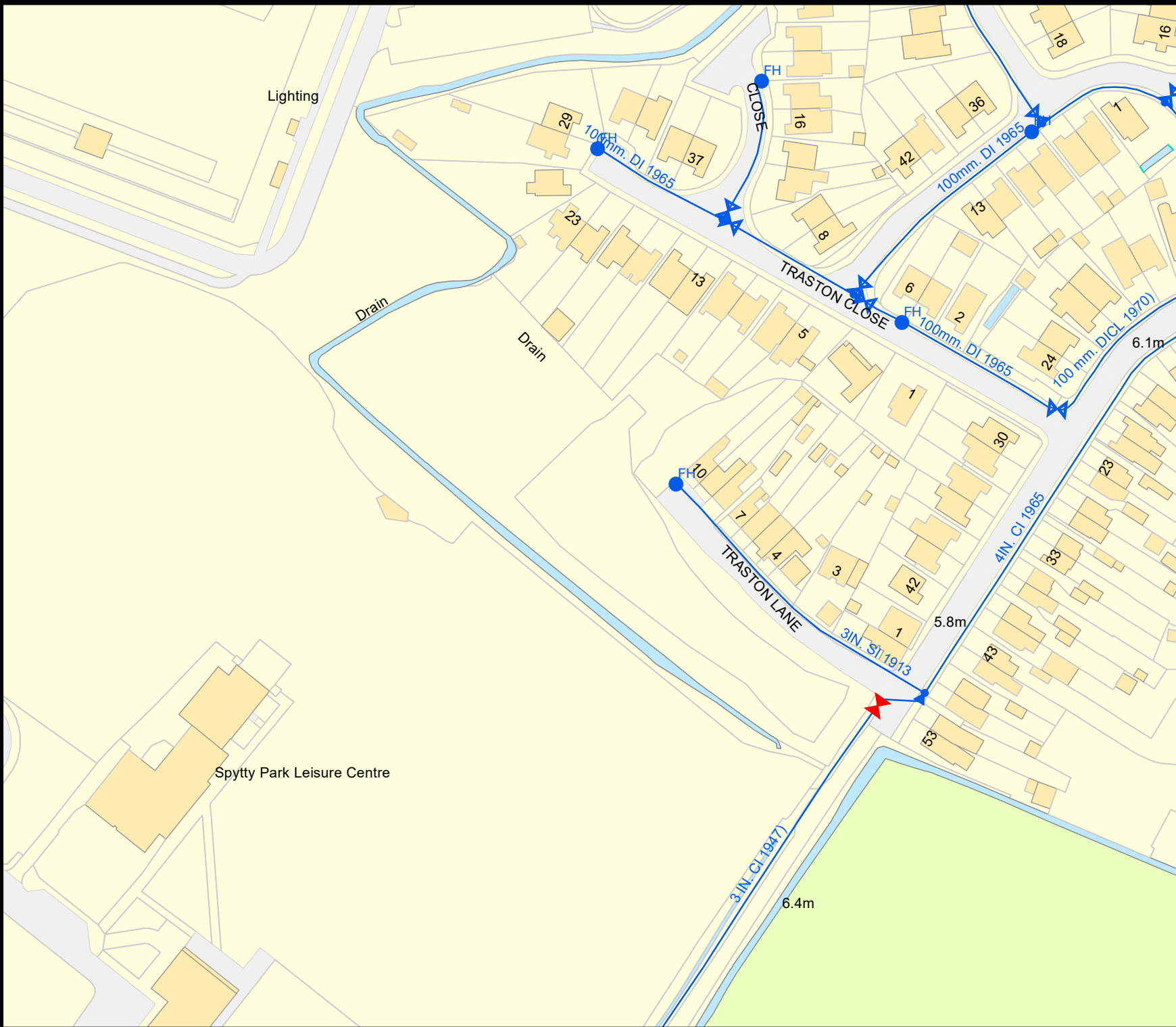
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Dŵr Cymru Cymraeg (the Company) gives this information as to the position of its underground apparatus by way of general guidance only and on the understanding that it is based on the best information available and no warranty as to its correctness is relied upon in the event of excavations or other works made in the vicinity of the company's apparatus. This level of notice appears before carrying out any excavations which are not in the vicinity of the company's apparatus. The level of notice appears before carrying out any excavations which are not in the vicinity of the company's apparatus. The level of notice appears before carrying out any excavations which are not in the vicinity of the company's apparatus. The level of notice appears before carrying out any excavations which are not in the vicinity of the company's apparatus.

EXACT LOCATIONS OF ALL APPARATUS TO BE DETERMINED ON SITE.

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Planning and new development

What you should do, and how we can help





Whether you're a homeowner with plans to extend your home, a builder working on a new house or a developer working on a new housing site, you need to involve us in the planning process. Even if you are just thinking about building, getting us involved early can help your project run smoothly and address any water and drainage matters as early as possible in the development process.

How can we help?

As water and waste services are at the forefront of public health and protection of the environment, we play a key part in the town and country planning process.

If you're planning on building new houses, our team of dedicated planning officers can give you advice and guidance at all stages of the process, including pre-application, planning application and discharge of condition.

When it comes to your new development, by getting us involved in the planning stages, we can:

- Assess whether the current local water and sewerage networks have capacity to service your new site (and if they can't, then identify whether the network can be reinforced to support your new site)
- Mitigate any potential negative impact that the new development could have on the performance of our infrastructure, the service we provide to customers, and the wider environment
- Identify where new development and growth is planned so that we can target investment in our existing infrastructure within these areas
- Provide advice on making new water and waste connections to our networks once your development is complete and ready to be occupied
- Identify any existing water or waste pipes in or near to the site, so we can advise on their location and let you know your options for protecting and/or diverting our assets for the lifetime of the development





Step 1: Use our pre-planning service

What is our pre-planning service?

We encourage all developers to engage with us as early as possible to ensure any water and drainage matters that might arise during the planning process are identified and addressed early on. In order to facilitate this, you can engage with us via our dedicated pre-planning service, which will provide:

- An assessment of the impact of your proposed development and whether our local water and waste networks can support it
- Confirmation of whether off-site water mains and/or sewers will need to be provided, and
- Water main and sewer plans indicating the location of our assets crossing the site or located in close proximity. *Please note that these are for general guidance only and all assets need to be accurately located on site before any excavation works begin.*

How can I access it?

You can submit a 'pre-planning advice' application online via our website. To make sure that we can provide you with the most comprehensive advice, you should include the following information:

- Site location plan
- Details of the proposed development
- Proposed points of communication to our local network of sewers and/or water mains (if known)
- Relevant planning history relating to the site e.g. any previous permissions granted or status within the council's development plan

You can see how much this service will cost on our website, and we'll aim to get back to you with a written **response within 21 days** of your application. The advice provided will be valid for 12 months and help inform our response when consulted on your planning application by the local planning authority (LPA).

For larger developments in Wales:

- You have to undertake pre-application consultation as set out in Schedule 4 of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 for any developments that:
 - Include 10 dwellings or larger
 - Have 1000sqm or larger non-residential floor space or
 - Have a site area that's 1 hectare or larger
- This means you need to consult with us and we will **respond within 28 days**.
- While there's no charge for this service, as it's a statutory requirement, we do recommend that you apply for our pre-planning service in advance of this consultation, as it will help to identify any potential issues that need to be addressed in advance of your planning application.





Step 2: Once you have our pre-planning advice



Locate our assets

Before you build, it's important to identify if any of our pipes, water mains or sewers are underneath the ground in or adjacent to your development site. Under section 159 of the Water Industry Act 1991, we have the rights of access to inspect, maintain, adjust, repair or alter any asset or apparatus at all times.

If your land does contain assets

If your land does indeed contain some of our assets, then this will have an impact on the layout and general arrangement of the new development site. We strongly recommend that you contact us to discuss accurately locating our assets to ensure that they are protected during and after construction. Please contact our Plan and Protect team via planandprotect@dwrcymru.com or 08009172652 to discuss further.

If you want to divert or remove the assets contained in your land

If you decide the asset located within or adjacent to your site can't be incorporated within the layout of the new development, or our rights of access to the asset may be hindered by your proposal, you can ask us to alter, divert or remove it in accordance with section 185 of the Water Industry Act 1991. You can find the application forms on our website.

How will you manage surface water?

As with all new development sites, you'll need to think about how to deal with surface water runoff from any new buildings and hard standings. Legislation in both England and Wales now actively encourages the use of sustainable urban drainage systems (SUDS). This approach manages surface water runoff by imitating natural drainage systems and retaining water on or near the site.

There are such a variety of SUDS techniques including green roofs, rainwater harvesting and permeable pavements that any development should be able to include a SUDS scheme. There would need to be good justification not to incorporate a SUDS scheme on your site.

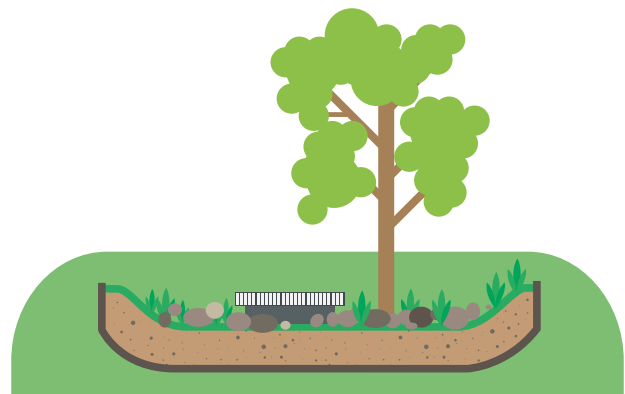
SUDS in Wales

All new development of more than one building or a construction area of 100m² or more will require consent from the sustainable drainage system (SUDS) approval body (also known as a SAB) for any new SUDS features, as required by Schedule 3 of the Flood and Water Management Act 2010. SABs are delivered by local authorities across Wales.

In accordance with this and the Welsh Government 'Statutory standards for sustainable drainage systems', you need to explore and fully exhaust all surface water drainage options, using discharge to a combined sewer only as a last resort.

SUDS in England

Even if your new development is based in England, it's important to keep Part H of the 'Building Regulations 2000' in mind. On this basis, all new developments in England will also be expected to consider surface water management techniques and demonstrate all technical options have been explored and exhausted, in liaison with the land drainage authority and/or the Environment Agency. You need to consider the management of highway or land drainage runoff as these flows won't be allowed to discharge directly or indirectly into the public sewerage system.



Step 3: The planning application process

Once you've used our pre-planning service and identified any potential issues before building, it's time to incorporate our advice into your proposals to your local planning authority (LPA).

As part of the planning application consultation process we will provide similar advice to that provided in our pre-application **response within 21 days**. It's important to note that while we share our expert opinion during this process, the ultimate decision to grant planning permission is the LPA's.

What are the options if we can't currently support your development?

Network hydraulic modelling/WwTW feasibility studies

As our aim is to support economic development and growth, we do not want to resist new development where possible. However, we must take the capacity of our existing assets, the service we are providing to existing customers and the environment into account. In areas where there are capacity constraints either on our networks or at the wastewater treatment works (WwTW), we may well already have proposals in place to deliver reinforcement works and to create capacity for new developments.

That being said, you may want to develop your site in advance of us undertaking these works. If this is the case, to ensure there's no detriment to our existing customers, you may be required to implement solutions identified by an assessment of either the network or WwTW. It's important to note that you won't be expected to resolve any existing operational issues.

Where further assessments are recommended, you will need to allow sufficient time in your development programme for these studies to be carried out and any reinforcement works to be delivered, as in some circumstances we won't permit a communication to our networks until these works are completed. The delivery of the works will need to align with occupation rather than construction.

Where possible, we will control the delivery of any solutions as part of the planning process. Dependent on the progress of the assessment, we may be in a position to recommend appropriate planning conditions so that the outcomes of the assessment can be delivered as part of any planning permission.

This approach allows us to support the progression of the site through the planning process, however in the absence of a completed assessment and known solutions we may need to work with you and the LPA until the assessment is completed and the outcomes are known.

Step 4: Connecting to our network

If you've had the green light from us and planning permission has been granted for your development, then it's time to start thinking about the different ways you'll need to connect to our network.

On our website you can find detailed guidance around applying for new water connections, new water mains, new public sewers and new sewer connections.

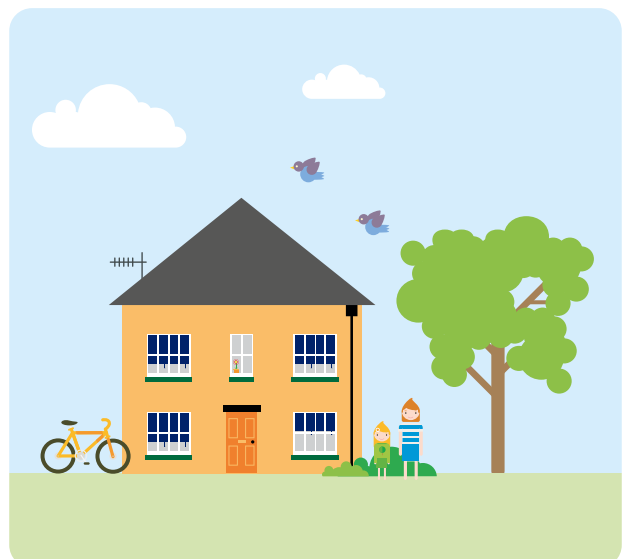
Contact us

If you've still got any questions or queries, then feel free to contact us:

Email: developer.services@dwrwymru.com

Visit: www.dwrwymru.com

Tel: 0800 917 2652





Contact Us:

If you've got any questions or queries,
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@dwrcymru



/dwrcymruwelshwater

From: [Saunders, Tyrone](#)
To: [LRM Planning](#)
Subject: RE: Pre-Application Consultation: Land at Traston Lane, Newport
Date: 17 December 2024 10:46:38
Attachments: [image002.png](#)
[image003.png](#)

You don't often get email from t-saunders@southwales-fire.gov.uk. [Learn why this is important](#)

Good Morning,

Thank you for notification of the above pre-planning application.

Please accept this email as acknowledgment of receipt of the formal notification. South Wales Fire and Rescue Service have looked at the application and have no comments to make at this stage.

Further comment/s will be made at the full planning application stage.

Kind Regards,

Tyrone Saunders
Rheolwr Gwylfa
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Ein cyf/Our ref: CAS-270706-J0B7
Eich cyf/Your ref:

LRM Planning
22 Cathedral Road
Cardiff
CF11 9LJ

Dyddiad/Date: 17 January 2025

Annwyl Syr/Madam/Dear Sir/Madam,

STATUTORY PRE-APPLICATION CONSULTATION – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED

BWRIAD/PROPOSAL: 26 affordable dwellings, new access works, landscape planting, a new pumping station, and associated works

LLEOLIAD/LOCATION: Land at Traston Lane, Newport

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 13 December 2024.

We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding flood risk. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.

Flood Risk

The planning application proposes highly vulnerable development (residential). Our Flood Risk Map confirms the site to be within Zone C1 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zone 3 (Sea).

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, we refer you to the tests set out in section 6.2 of TAN15. If you consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for the applicant to demonstrate through the submission of a Flood Consequences Assessment (FCA) that the potential consequences of flooding can be managed to an acceptable level.

We have reviewed the FCA undertaken by PHG Consulting Engineers, dated December 2024, reference 2595-PHG-XX-XX-RP-C-0001. Our advice to you is that the FCA fails to demonstrate that the risks and consequences of flooding can be managed to an acceptable level for the reasons explained below.

Given the age of the previously approved FCA and provision of additional residential units, we would expect any planning application to provide the most up to date information to ensure all interested parties are aware of the flood risk. Whilst the Finished Floor Level (FFL) is provided in the FCA, no up to date flood depths across the site are provided and as such we are unable to compare flood depths against the FFL, nor ancillary areas and access in the extreme flood events.

From our review of other FCAs in the Newport area, the FFL of 6.8m AOD (above ordnance datum) appears to be very low and may not be sufficient mitigation against the extreme events.

If no further information is submitted with a future application, or a revised FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we may object to this application.

As it is for the Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, we will recommend they consider consulting other professional advisors on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

European Protected Species

We note the Preliminary Ecological Appraisal (Ecological Services, December 2024) has identified that a Ground Based Visual Roost Assessment of all trees proposed for removal and bat activity transect surveys are recommended for the site to gain an understanding of the sites usage by bat species.

We recommend you seek the advice of the Local Authority ecologist to determine the need for and/or the scope of further survey work.

Any further survey work should be carried out in accordance with 'Bat Surveys for Professional Ecologists; Good Practice Guidelines 4th Edition' published by the Bat Conservation Trust 2023.

We therefore have no comments to make on the proposal, as submitted. The Local Authority should consult us if any survey undertaken finds that bats are present at the site, and further advice is required from us.

Pollution Prevention

During the construction phase you should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages. For further

guidance please refer to Guidance for Pollution Prevention (GPP) 5: Works and maintenance in or near water, and GPP 6: Working on construction and demolition sites, which are available on the [NetRegs website](#).

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Gail Moody

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: southeastplanning@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000 65 3549

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

CARDIFF OFFICE

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RTPI
Chartered Town Planner