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Development Control VoG Council

Friends of the Earth
Barry & Vale
y Barri a'r Fro
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LATE REPS Model Farm Development

At 1 March Planning Committee Application 2019/00871/OUT

FoE object to dealing with sewage as a Reserved Matter
It cannot be dismissed as a "Condition". It's as fundamental an issue as highway access. Welsh Water objects that

> i*t is unlikely that sufficient capacity exists to accommodate this development.*

They write the developer needs

> *to undertake Hydraulic Modelling Assessments (HMAs) of the public sewerage system*

An HMA is essential to decide if there is a practicable solution. As the developer fails to carry out an HMA, the Council cannot know if one exists.

Developers of west Cardiff's Plasdwr site have been told that Cog Moors sewage works are overloaded to such an extent that sewage from that development cannot be accommodated as had been promised. Instead, in 2021 they devised a hotly contested scheme to take its sewage to the East Moors sewage works; Cardiff Council's approval is under challenge via JR in the High Court. The VoG Council should not similarly risk a judicial challenge because they fail to establish the practicability of a sewage solution.

The HMA for a sewage solution involves considering basic options as for Plasdwr:

- new sewage treatment works (if taking it to Llantwit STW is excluded)
- schemes to divert surface water run-off from the sewer (SuDS) over areas in the catchment

The application and its ES fail to cover either options in outline, as necessary to underpin an HMA. Where would a new sewage works be sited? Could Cog Moors STW be expanded ? Would retrofitted SuDS schemes be practicable on a reasonable timescale. Would the developer be ready to fund either option (when the development is already said to be non-viable)? The easier SuDS schemes are anyway required to cope with increasing storm-intensity under climate change (with VoG and DCWW funding) so further schemes to allow for sewage from the Model Farm development cannot be presumed – outline assessment is needed for this Outline application.

We object to *drainage* being treated as a reserved matter. Such a large scale urban development inevitably creates much run-off from rooves and hard surfaces, which goes rapidly into local streams – this both accelerates their erosion and adds to flooding of Porthkerry Park. With climate change increasing storm intensity, development has to include measures to counteract these environmental harms. The ES fails to provide the necessary information on them. No counteracting let alone mitigation measures are shown to be practicable.

The schemes proposed to collect and discharge run-off via the SuDS framework and approval Board fail to deal with the problem. Attenuation ponds have inadequate capacity (under SuDS procedures) to hold back rain-water from intense storms. They just delay the run-off by an hour or less, compared with the hours and days delay for rainwater that infiltrates the fields. Holding ponds of sufficient capacity would take substantial land and need designing into the outline plan. Otherwise discharge to the sea via a new surface water pipe might be feasible. This has to be desined in the outline plan.

The Council's commitment to the Climate Emergency requires it to seek the full information missing from the ES at the outline permission stage.

In what way is Welsh Water capacity lacking to take the Foul Water (sewage) ?

They do not say if it's capacity of the sewer and pumps, or capacity of the sewage treatment works. The data on untreated sewage spills imply both.

Welsh Water don't admit to breaching discharge consents which say CSOs can discharge only storm water, yet discharging into Barry Dock storm overflow 150 times a year far exceeds all definitions of "storms". Welsh Water data for the high-capacity long sea outfall from The Knap shows it operating routinely, perhaps because of limited pumping capacity to take it to Cog Moors STW as was planned.

Cog Moors STW discharges untreated sewage around 70 times a year; it was designed for under 3 "spills" over the summer bathing season, but was 3 times worse in 2021. (Welsh Water and NRW ignored the impact on sea-users through the winter months).

Cog Moors STW was also designed with a maximum spill rate for untreated sewage. Physically the plant cannot spill more untreated foul water than this, and the data show it hits this maximum. It did so during the 23 December 2020 storm, when roadway drains stopped taking the stormwater, flooding in Penarth streets and Cosmeston. Welsh Water decided to admit Cog Moors did not have "capacity" for taking and discharging even untreated sewage.

Welsh Water's Future Plans do not meet the shortage in capacity in the VoG

The VoG was consulted on the forward plan last autumn (the strategic plan is still awaited). That included nothing for the Cog Moors STW and catchment. The Council Leader objected at the lack of investment towards meeting Blue Flag standards at Barry beaches in the 2025-2030 plans, as the Welsh Government say to concentrate on CSOs discharging to rivers. NRW has no priority for watersports and bathing users of coastal waters.

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