

Harlech Court, Bute Terrace, Cardiff

Flood Consequence Assessment

Jubb

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1 Project Information

1.1 Project Information

Client Draycott Group Ltd

1.2 Project Details

Project Name Harlech Court

Location Harlech Court, Bute Terrace, Cardiff

Jubb Project Number 24182

1.3 Report Details

Version 02

Status Planning Issue

Date 07/10/2024

1.4 Project Authorisation

ISSUE HISTORY:

Version	Date	Detail
01	12/06/24	First Issue
02	07/10/24	Planning Issue

AUTHORISATION:

Prepared By	Approved By
MS	EH
MS	EH

2 Introduction

2.1 Commission

- 2.1.1 This Flood Consequence Assessment has been commissioned on behalf of Draycott Group Ltd to support a planning application for the proposed development at Harlech Court, Bute Terrace, Cardiff.
- 2.1.2 This report is for the private and confidential use of Draycott Group Ltd. (to whom alone is owed a duty of care) and their professional advisors and consultants in connection with the current development proposals for the site.
- 2.1.3 This report may not be relied upon or reproduced by any third party for any use without the written agreement of Jubb Consulting Engineers Ltd.

2.2 Brief

- 2.2.1 This Flood Consequence Assessment is prepared in accordance with the requirements of the Technical Advice Note 15: Development and Flood Risk (TAN15) published by the Welsh Government.

This report addresses the requirements set out in TAN15 and other issues, which are deemed relevant to flood risk. These requirements include the following:

- Assessment of the magnitude and severity of flood risk to the site
- Assess suitability of the site and development through the use of the Justification Test, including acceptability of consequences (if required)
- Consider flood risk due to overtopping of existing flood defences
- Assess the impact of the proposed development on flood risk to adjacent developments
- Demonstrate the appropriate mitigation measure have been taken to prevent flooding
- Demonstrate the appropriate emergency situations have been considered e.g. evacuation routes

2.3 Consultation

- 2.3.1 Liaison with Natural Resources Wales (NRW) has been carried out to help inform this FCA and includes the acquisition of flood data from NRW. Flood data available for the site and its immediate surrounds only included adjacent design tidal levels.

3 Existing Site

3.1 Location

- 3.1.1 The proposed site is a brownfield site that consists of a purpose building office building and associated car parking, located south of Bute Terrace, Cardiff. The site is approximately 0.19 ha in area, with a National Grid Reference (NGR) of ST 18713 76079, or E318713 , N176079.
- 3.1.2 The site boundaries are formed by the Alto Lusso residential building to the south west, the Citrus hotel building to the north east, Bute Terrace to the west and the canal to the east.
- 3.1.3 A site location plan is included in Appendix A.

3.2 Current Land Use

- 3.2.1 The proposed site currently contains a purpose built office building and associated parking.
- 3.2.2 A bar is located in the basement area, with the area above currently used car parking for both the office building and adjacent hotel.

3.3 Site Topography

- 3.3.1 A topographical survey has been undertaken of the proposed site.
- 3.3.2 It should be noted that the majority of the site consists of industrial warehouses with ancillary car parking provided and is therefore predominantly hard surfaced.
- 3.3.3 The site is relatively flat with levels across the site varying from a high point of 8.50mAOD adjacent to Bute Terrace to a low of 7.70mAOD around the central area. The site currently sits on multiple levels with associated parking.
- 3.3.4 A copy of the topographical survey is included in Appendix B.

3.4 Site Geology

Geology

- 3.4.1 The British Geological Survey (BGS) maps indicate that the site is underlain with Mercia Mudstone Group (Mudstone).
- 3.4.2 Superficial deposits have been indicated beneath the site and are shown to comprise of glaciofluvial sheet deposits (sand and gravel).

Hydrogeology

- 3.4.3 The British Geological Survey (BGS) hydrogeology maps indicate that the site is underlain with Triassic Rocks (Undifferentiated), which are rocks which act as low productive aquifers.
- 3.4.4 The Environment Agency (EA) website-published indicative aquifer mapping identifies that the solid geology beneath the site is identified as a Secondary B aquifer.
- 3.4.5 Secondary B aquifers are assigned in cases where the geology exhibits predominantly lower permeability layers which may store and yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons and weathering. These are generally the water-bearing parts of former non-aquifers.
- 3.4.6 The Natural Resources Wales (NRW) groundwater source protection zones map show that the proposed site is not located within a groundwater protection zone.

Hydrology

- 3.4.7 There are no watercourses located within the proposed site. A canal is present to the east of the site.
- 3.4.8 The nearest watercourse to the site is the River Taff, which is an NRW designated 'main river'. At its nearest point south west of the site the River Taff is approximately 700m away. The River Taff is tidally influenced adjacent to the site with water levels controlled by the Cardiff Bay Barrage downstream.

3.5 Existing Drainage

- 3.5.1 The existing public sewer network currently serving the greater Cardiff area is owned and maintained by Dwr Cymru Welsh Water (DCWW).
- 3.5.2 DCWW asset plans indicate that Bute Terrace is drained by a few different surface water Highways sewers, ranging in size from 600 diameter to 225 diameter. A 900x660 DCWW combined sewer drains is shown along Bute Terrace.
- 3.5.3 The site is currently served by private drainage networks that are assumed to discharge both foul and surface water runoff offsite into the DCWW network. The location and type (i.e. foul/surface/combined) of offsite connections will need to be confirmed via CCTV survey.
- 3.5.4 A copy of the Dwr Cymru Welsh Water asset plan is included in Appendix C.

4 Flood Risk to the Existing Site

This section explores the primary sources of flooding to the site.

4.1 Tidal & Fluvial Flooding

- 4.1.1 The proposed site is identified as lying within Flood Zone 3, with the land benefiting from flood defences in the NRW `published floodplain map (refer to Figure 1). This estimate of the extent of flooding is based on the absence or failure of all existing flood defences currently protecting the site.

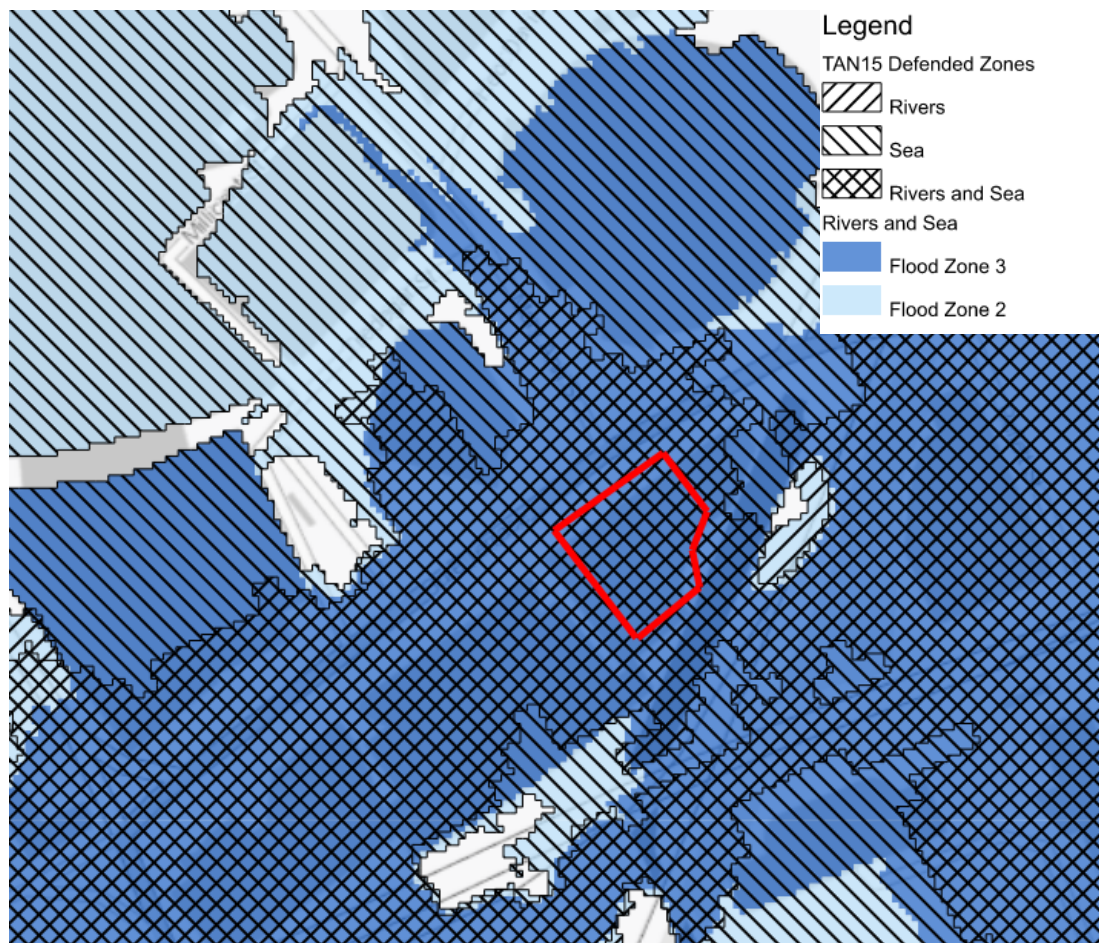


Figure 1 – Extract from NRW Fluvial/Tidal Flood Risk Map

- 4.1.2 Flood Zone 2 illustrates the expected extent of a 1 in 1000 year tidal or fluvial event and also contains areas recorded to have flooded in the past, while Flood Zone 3 illustrates the expected extent of a 1 in 100 year fluvial event or a 1 in 200 year tidal event.
- 4.1.3 Due to the existing ground levels on the site, proximity to the sea and the relationship between fluvial and tidal flows within the region, tidal flooding can be seen to pose the main risk of flooding to the site.
- 4.1.4 The water levels within the nearest watercourse to the site the River Taff are controlled by the downstream Cardiff Bay Barrage. Sluice gates ensure that when sea levels drop below 4.5mAOD fluvial flows from the river are released directly into the sea. Due to the cyclical nature of tidal flooding and the presence of the Cardiff Bay lake inside the Barrage, which has a relatively large storage capacity, the probability of fluvial flooding affecting the site is extremely low as the lowest ground levels within the site is at 7.70mAOD.
- 4.1.5 NRW extreme sea levels for the higher central allowance (70th %tile) taken from the nearest data point to the site are shown below in Table 1;

Event	Climate Change Horizon			
	2017	2100	2120	2124
T1	6.98	7.83	7.99	8.02
T20	7.39	8.24	8.40	8.43
T100	7.67	8.52	8.68	8.71
T200	7.79	8.64	8.80	8.83
T1000	8.16	9.01	9.17	9.20
T10000	8.85	9.70	9.86	9.89

Table 1 – NRW Extreme Sea Levels Data Adjusted for Climate Change (70th percentile)

- 4.1.6 Table 1 shows that extreme sea levels are predicted to rise significantly due to climate change with the proposed 1 in 200 year tidal level predicted to be at 8.83mAOD in 2124, which is above the low point on the existing site. This data infers that it might be possible that tidal flooding may occur within the site, however, this does not take into account tidal defences and the influence of obstructions on flows between the sea and the site. The site is approximately 3.5km upstream of the Cardiff Bay Barrage.
- 4.1.7 The site is defended primarily as mentioned above by the Cardiff Bay Barrage and also by secondary lateral defences along Cardiff Bay and the River Taff. The Cardiff Bay Barrage is the main defence which defends the whole of Cardiff Bay from extreme tidal flows and has been designed accordingly with the NRW stating that it currently provides in excess of 1 in 1000 year standard of protection. The barrage is maintained on a frequent basis, thus the possibility of failure is considered to be very low. Due to the importance of this structure it is assumed that it will also be upgraded in time to account for climate change sea level rises.
- 4.1.8 Lateral defences within Cardiff Bay and the River Taff also provide a minimum level of protection at 8mAOD.
- 4.1.9 These defences provide significant protection to the dense urban environment within Cardiff and the site in question, thus the risk of tidal flooding affecting the existing site is considered to be low.

4.2 Overland / Surface Water Flooding

- 4.2.1 The NRW Surface Water Flood Risk Map (refer to Figure 2) doesn't show any of the existing site being at risk of surface water flooding. Areas adjacent to the site show a low risk of surface water flooding, including on the opposite side of Bute Terrace, and around the canal to the rear of the site.

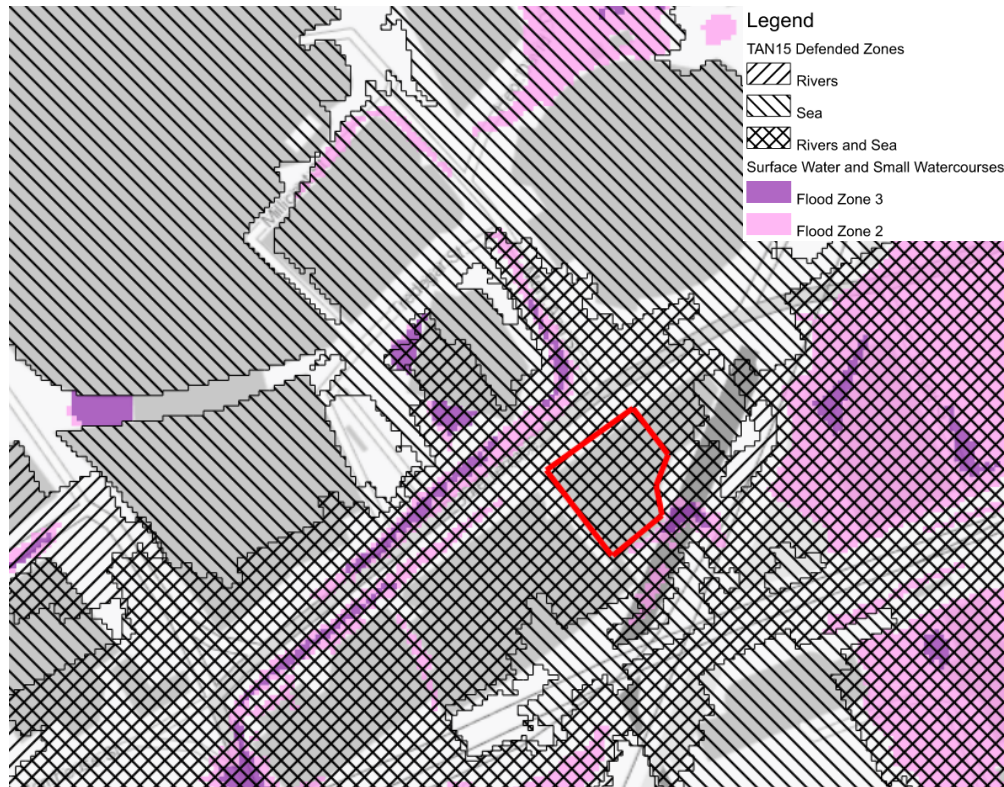


Figure 2 – Extract from NRW Surface Water Flood Risk Map

- 4.2.2 The surface water flooding shown on Bute Terrace to the north west will not affect the site due to Bute Terrace levels falling away to the west.
- 4.2.3 The surface water flooding shown to the south east of the site is related to the existing canal. The surface water does not have a pathway to the site due to the canal walls being a higher level, 7.92m AOD
- 4.2.4 There are no historic records of overland and surface water flooding affecting the proposed site. Based on this and the factors described above, the proposed site is not considered to be at risk from overland and surface water flooding.

4.3 Flooding from Sewers

- 4.3.1 There is minimal risk of flooding due to the existing onsite private sewers as they would have been designed to account for relatively large rainfall events/peak foul loadings.
- 4.3.2 If a downstream blockage of gullies occurs within Bute Terrace, there is risk of backing up flows inundating the site. There are no records of historical flooding caused by the local sewer infrastructure, within the site, which indicates the low point on Bute Terrace is lower than the site levels. Consequently, it is not considered that flooding from sewers poses a significant risk of flooding to the proposed development.

4.4 Flooding from Groundwater

- 4.4.1 The underlying geology beneath the proposed site has been identified as Triassic rocks, which has low productive aquifer properties.
- 4.4.2 It is difficult to undertake a quantified assessment of the risk of groundwater flooding on the proposed site. This is due to a lack of groundwater levels records, the variability in geological conditions and the lack of predictive tools that can be used to make assessments of groundwater flow and risk of groundwater flooding following rainfall events.
- 4.4.3 No detailed on-site geotechnical investigation works has been undertaken on the proposed site. It is therefore difficult to estimate the potential impact of groundwater levels on the proposed site.
- 4.4.4 However, there are no historic records of groundwater flooding events on the site and therefore it is considered that flooding from groundwater does not pose a significant risk to the site.

4.5 Flooding from Artificial Sources

- 4.5.1 The NRW Reservoir Flood Risk map (refer to Figure 3) illustrates that part of the site, along with most of Cardiff Bay is at risk of reservoir flooding. The maps estimate flood depths between 0.3-2m within the site.



Figure 3 – Extract from NRW Reservoir Flood Risk Map

- 4.5.2 This risk is due to the Beacons, Cantref and Pontsticill reservoirs that are located approximately 40 miles north of Cardiff city centre. The extent of this flooding is based on the assumption of complete failure of these reservoirs and is extremely unlikely to occur, therefore flooding due to reservoirs is considered low for the site.

5 Proposed Development

5.1 Development Description

- 5.1.1 The current proposals for the site include the demolition of the existing office building, car parking and basement bar, and the construction of a residential development.
- 5.1.2 The proposed development comprises of 350 build to rent apartments, bike stores, and associated car parking at ground floor level, along with 137m² commercial space. No residential development is proposed at ground floor level.
- 5.1.3 Vehicular access to the site will be provided via Bute Terrrace through a new junction immediately north west of the site.
- 5.1.4 A plan of the proposed site plan is included in Appendix D.

5.2 Development Suitability

- 5.2.1 TAN15 aims to direct developments to suitable areas with a lower probability of flooding. Development suitability is also considered with a greater emphasis placed on locating more vulnerable infrastructure within Development Advice Map Zone A.
- 5.2.2 The proposed development is a residential led scheme and is therefore classified as 'highly vulnerable' under Figure 2 of TAN15.
- 5.2.3 The proposed site is identified as primarily lying within Zone C1 according to the NRW published Development Advice Map (refer to Figure 4) with the remainder of the site considered to be within Zone B.

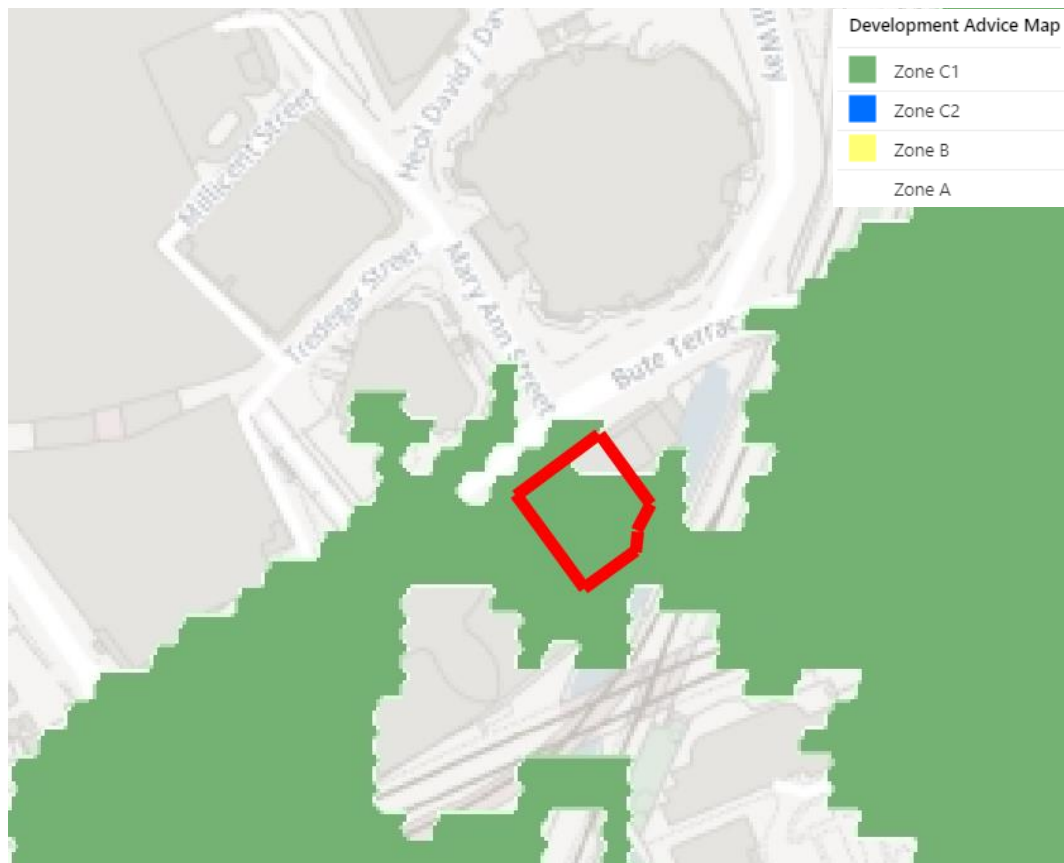


Figure 4 – Extract from NRW TAN15 Development Advice Map

5.2.4 Zone C1 is described as areas of the floodplain which are developed and served by significant infrastructure, including flood defences.

5.2.5 Per TAN15 guidance all proposed use types within Zone C1 are required to undergo a justification test that includes an acceptability of consequences assessment to determine the suitability of the development.

5.3 Justification Test

5.3.1 TAN15 advises that all new developments should only be permitted within Zones C1 and C2 if determined by planning authority to be justified in that location. Development, including transport infrastructure, should only be considered justified if it can be demonstrated that;

- 1) Its location in Zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement; or
- 2) Its location in Zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region; and,
- 3) It concurs with the aims of Planning Policy Wales (PPW) and meets the definition of previously developed land (PPW fig 2.1); and,
- 4) The potential consequences of a flooding event for the particular type of development have been considered and found to be acceptable.

- 5.3.2 The site has been allocated for future mixed-use development under the Cardiff Local Development Plan 2006-2026. The site sits within Strategic Site A within the schematic framework for Cardiff Central Enterprise Zone and Regional Transport Hub
- 5.3.3 The Cardiff Central Enterprise Zone encompasses 78.8ha of existing brownfield sites that are proposed to be upgraded/improved to meet future demand for employment/housing in the critical strategic region and promotes a sustainable regeneration of the area.
- 5.3.4 This strategic allocation thus addresses points 1, 2 and 3 above. To address point 4, the minimum finished floor level (FFL) for the residential part of the development will be provided at or above the 1 in 200-year tidal event level for the proposed life of the building (i.e. 100 years), whilst the 'low vulnerability' ground commercial will be positioned close to existing external levels. Due to the level of existing and future flood risk to the site, the potential consequences of flooding to the site are considered to be low and the justification test is therefore assumed to be passed. The potential consequences of flooding are explored in more detail below in Section 5.4.

5.4 Acceptability of Consequences Assessment

Acceptability Criteria

- 5.4.1 TAN15 provides an indicative guidance as to what the frequency threshold could be for different types of development described in terms of annual probability of occurrence:
- 5.4.2 The site currently is shown by NRW data to be fully inundated during the 1 in 200-year tidal event, assuming tidal defences were not available for the site and the surrounding area.

Type of Development	Threshold Frequency	
	Fluvial	Tidal
Residential	1 in 100 year	1 in 200 year
Commercial	1 in 100 year	1 in 200 year

Table 2 – Indicative Guidance of TAN15 Section A1.14 (Target for no flooding)

- 5.4.3 In the absence of further fluvial/tidal modelling data for the area, the threshold frequency level for the site has been conservatively based on assuming that the site is undefended from tidal flood levels and all other obstructions in the path between the sea and the site are ignored.
- 5.4.4 It is therefore proposed that finished floor levels (FFL) for the 'highly vulnerable' residential units be set at a minimum level of 8.91mAOD, which is equivalent to the adjacent year 2120 1 in 200-year tidal event level to the site. Due to the existing external levels within the site and the high level of protection afforded by the tidal defences it is not considered practicable/reasonable to provide an extra freeboard on this level.
- 5.4.5 It is proposed that 'Low vulnerable' commercial units be provided below this threshold level at a FFL similar to existing external levels which will generally be 8.0-8.3mAOD. These levels will be confirmed prior to planning permission.
- 5.4.6 As identified in Section 4.1, the existing site is at low risk of flooding from all sources, with the high level of protection provided by tidal defences ensuring the site is at low risk of the main risk of tidal flooding for the proposed lifetime (i.e. 100 years) of the development. Due to the impracticality of raising all external levels within the site, the consequent difficulty of providing access directly from Bute Terrace and the high level of tidal defence provided for the site, it is considered reasonable that FFL's for the commercial units are set at existing ground levels.
- 5.4.7 The future 1 in 1000-year tidal event, assuming the absence/failure of tidal defences, may inundate the site above the 600mm max depth of flooding provided by A1.15 in the TAN15. The alteration of the ground/road levels outside of the development footprint is beyond the control of the developer and hence this guidance cannot be reasonably achieved within the site.

Development Flood Risk

- 5.4.8 As highlighted in Section 4.1 there is a residual risk of future tidal flooding to the site due to a climate change induced rise in sea level. This risk assumes the failure of tidal defences downstream of the site that includes the Cardiff Bay Barrage and lateral barriers adjacent to Cardiff Bay and the River Taff. Due to the significance of these defences (i.e. low probability of failure) and the proposed development's design (i.e. only 'low vulnerable' commercial located below TAN15 threshold frequency level) the risk of tidal flooding is therefore considered very low for the site.
- 5.4.9 The development will not increase the probability for flooding within the site or the surrounding area. A new surface water network will be constructed onsite that will follow local and national guidance and ensure no offsite flooding for all return periods up to the 1 in 100-year return period including an allowance for climate change.

Flood Mitigation Measures

- 5.4.10 Flood resilient construction techniques will be provided within the commercial development up to the future 1 in 200-year tidal event level. Such techniques may include concrete flooring, raised sockets etc.
- 5.4.11 Due to the nature of tidal flooding (i.e. cyclical) fully surrounding the site, and the distance between the site and a safe evacuation area/the higher ground associated within central Cardiff it is not considered safe or appropriate that evacuation of the site occurs during a flood event.

- 5.4.12 The proposed residential FFL's for the site ensure that all residential units can be considered 'safe havens'. A communal community space will be required above the TAN15 threshold frequency to ensure a 'safe haven' for commercial workers. In failure/overtopping of adjacent tidal defences residents are to remain in their units until the risk of flooding has passed, which will be determined by NRW guidance.
- 5.4.13 All residents/businesses will be signed up to the NRW 'Floodline Warnings Direct' scheme so they receive advance warnings of potential flooding and will be made to complete an NRW personal flood plan.
- 5.4.14 With the time afforded by advance warning, evacuation of property to safe egress and the removal of valuables from buildings can be implemented. A means of safe access and egress from the site is likely to be afforded at all times prior to even partial flooding of the site and/or surrounding areas. It is crucial that all occupants of the site be aware of this inherent risk, and the planned egress route.

6 Drainage Strategy

6.1 Foul Drainage

- 6.1.1 New foul drainage infrastructure will be implemented to accommodate foul flows from the proposed development, utilising the existing connection from site where possible.
- 6.1.2 The new network will be designed to convey foul flows to a connection point into the adjacent Dwr Cymru Welsh Water (DCWW) sewer network. Liaison with DCWW will be required to ascertain a suitable connection point into their existing network and to confirm if the local network has sufficient capacity to accommodate the development.

6.2 Surface Water Drainage

- 6.2.1 A new surface water drainage network will be implemented onsite that will be designed to meet the Sustainable Drainage Approval Body (SAB) requirements.
- 6.2.2 The proposed surface water drainage is to be designed in line with the SuDS hierarchy. Disposing of surface water via infiltration is to be prioritised, and if deemed unfeasible, as there are no watercourses adjacent to the site the network is to be connected to a sewerage system. Due to the nature of the stratum within the site it is not expected that infiltration will be feasible, however this will need to be confirmed. The water levels within the adjacent watercourse/canal are considered too high for a surface water connection. A proposed connection to a sewerage system must be limited where possible. This can be achieved via flow control devices and attenuation features.
- 6.2.3 Should the proposed surface water drainage need to relay on a connection to a sewerage network, the proposed connection(s) and discharge rate(s) must be agreed with DCWW and the SAB.
- 6.2.4 SuDS features will ensure that water quality, amenity and biodiversity conditions are appropriately provided within the site.

7 Key Conclusions, Considerations and Recommendations

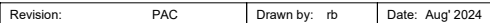
The proposals for the regeneration of the newly named Harlech Court includes the demolition of the existing office buildings and the erection of a tower block that will house 450 residential apartments, approximately 137m² of ground floor commercial and ancillary features. The site is predominantly within Zone C1 as defined in TAN15. Under TAN 15 the development is classified as a 'highly vulnerable' and is therefore required to undergo a justification test, which includes an acceptability of consequences assessment.

A technical assessment of the consequences of flooding of the site has been carried out in accordance with the requirements of TAN15. In respect of the criteria outlined in this document the findings are as follows:

- The development site is allocated for mixed-use development within the Cardiff Local Development Plan and therefore satisfies the justification test outlined in Section 6 of TAN15.
- The main source of flood risk to the site is tidal, though this risk can be considered very low due to significant flood alleviation infrastructure provided downstream that includes the Cardiff Bay Barrage.
- Proposed minimum residential FFL's of 8.91mAOD to be set, which is equivalent to the future 1 in 200-year adjacent tidal level and meets TAN15 threshold tolerance for a residential scheme.
- Commercial unit FFL's to be set at equivalent existing ground levels, which is deemed acceptable due to the high level of tidal defences provided and subsequent low risk of flooding to the site for the lifetime of the development.
- Units and community space above TAN15 threshold frequency to act as 'safe havens' during flooding event, with evacuation of the site not advised.
- All residents/businesses are to be signed up to the NRW 'Floodline Warnings Direct' scheme.
- Surface water drainage to be suitably designed in line with local and national requirements.

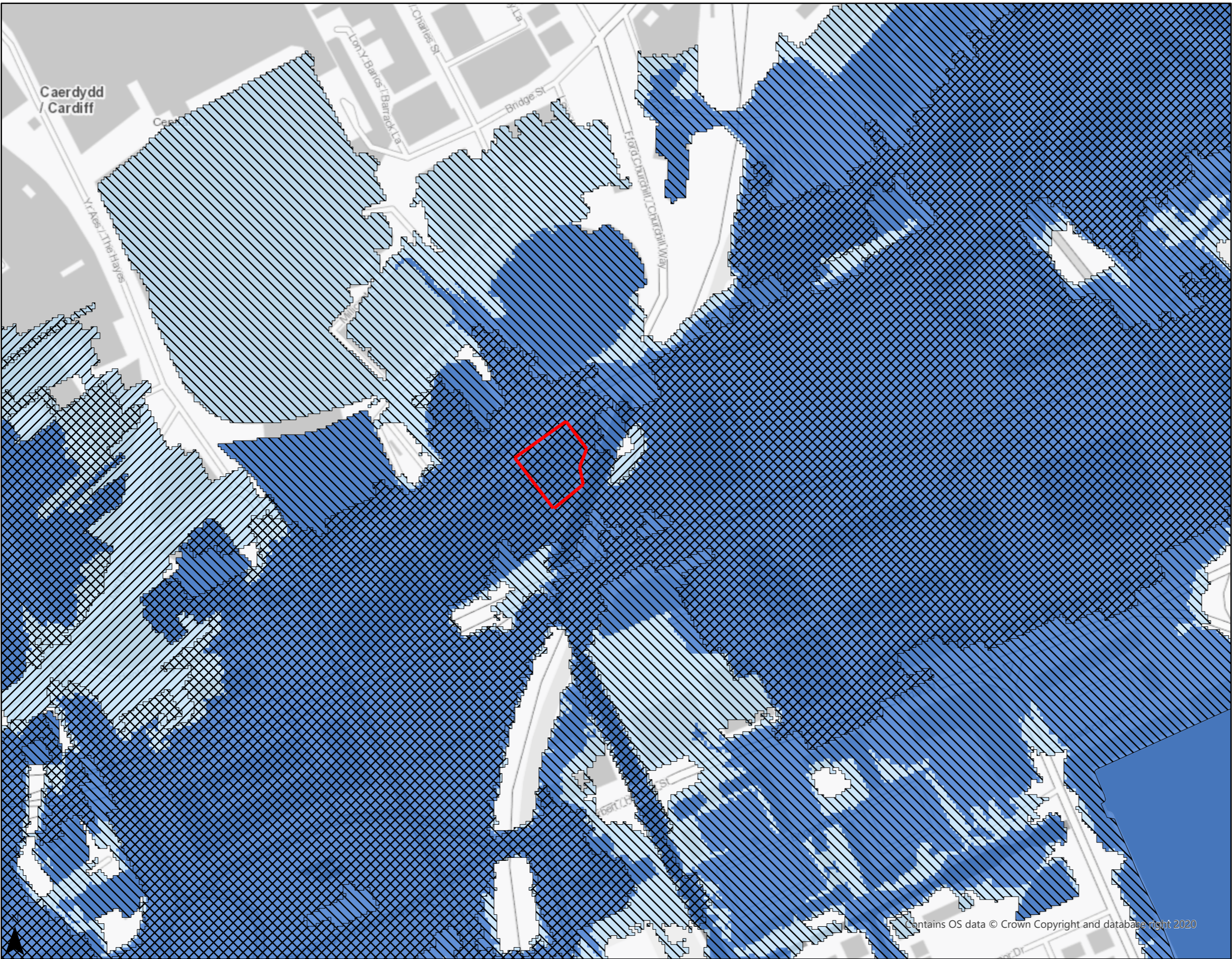
Therefore, based on the findings of the FCA, it is considered that the principal objectives of TAN15 have been satisfied and that the development proposals are acceptable in terms of flood risk.

Appendix A: Proposed Site Layout



Appendix B: Topographical Survey




Appendix C: Natural Resources Wales Development Advice Maps





Flood Map for Planning - Basic
Flood Zone Rivers and Sea

Legend

TAN15 Defended Zones

-  Rivers
-  Sea
-  Rivers and Sea

Rivers and Sea

-  Flood Zone 3
-  Flood Zone 2

Scale at A3: 1:2,500

Date: 09/09/2024

Flood Map for Planning - Basic
Flood Zone Surface Water

Legend

TAN15 Defended Zones

 Rivers

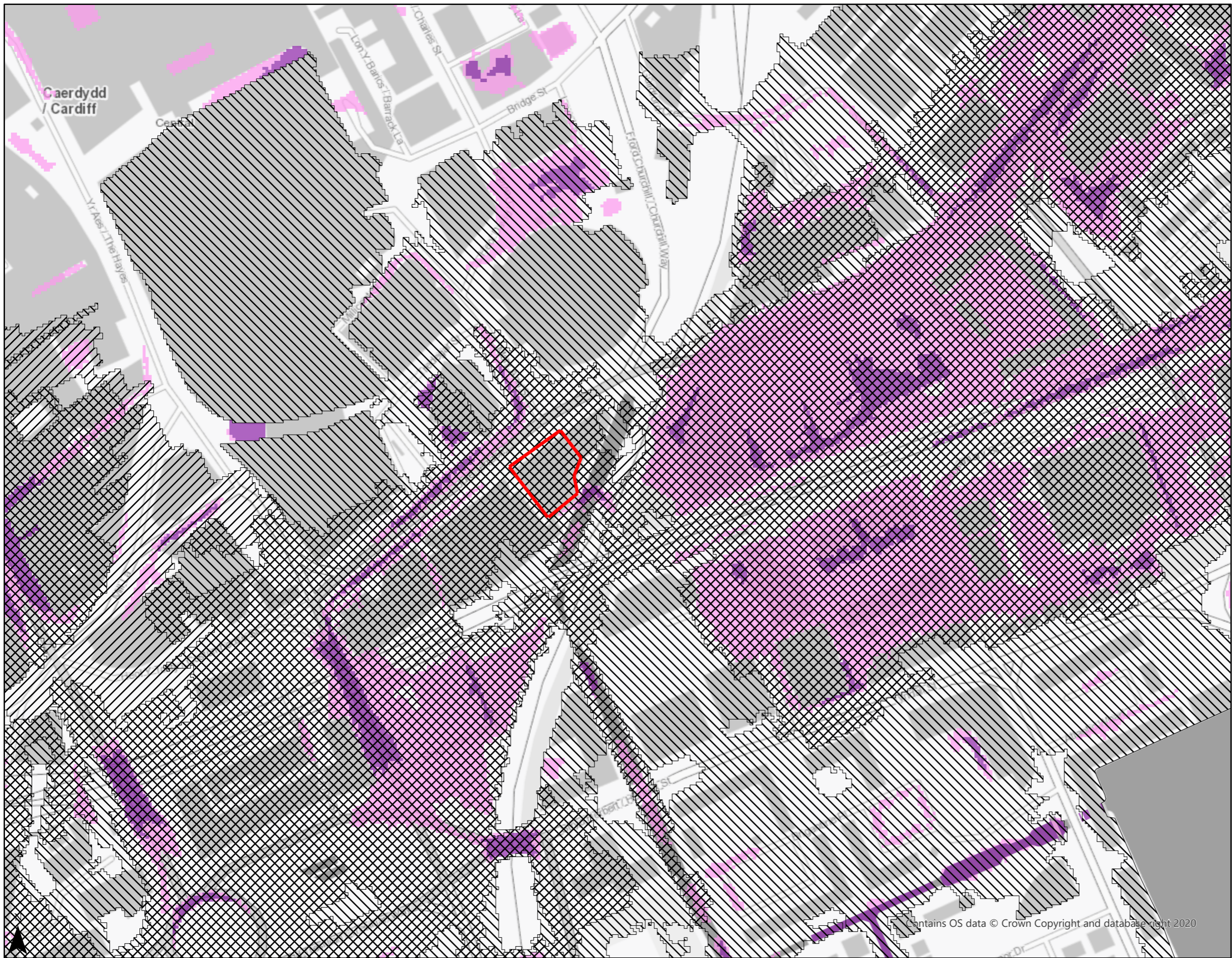
 Sea

 Rivers and Sea

Surface Water and Small Watercourses

 Flood Zone 3

 Flood Zone 2



Scale at A3: 1:2,500

Date: 09/09/2024

0.1 0.05 0 0.1

km

British National Grid

Disclaimer

<https://naturalresources.wales/flooding/disclaimer-for-our-flood-and-coastal-erosion-risk-maps/?lang=en>

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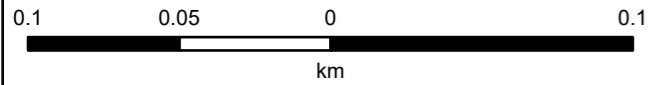
Flood Risk Maps
Flood risk from resevoirs

- Legend**
- Areas Benefitting from Flood Defences
- Rivers
 - Sea
 - Rivers and Sea
 - Flood Risk from Reservoirs
 - Main Rivers

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Scale at A3: 1:2,500

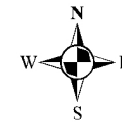
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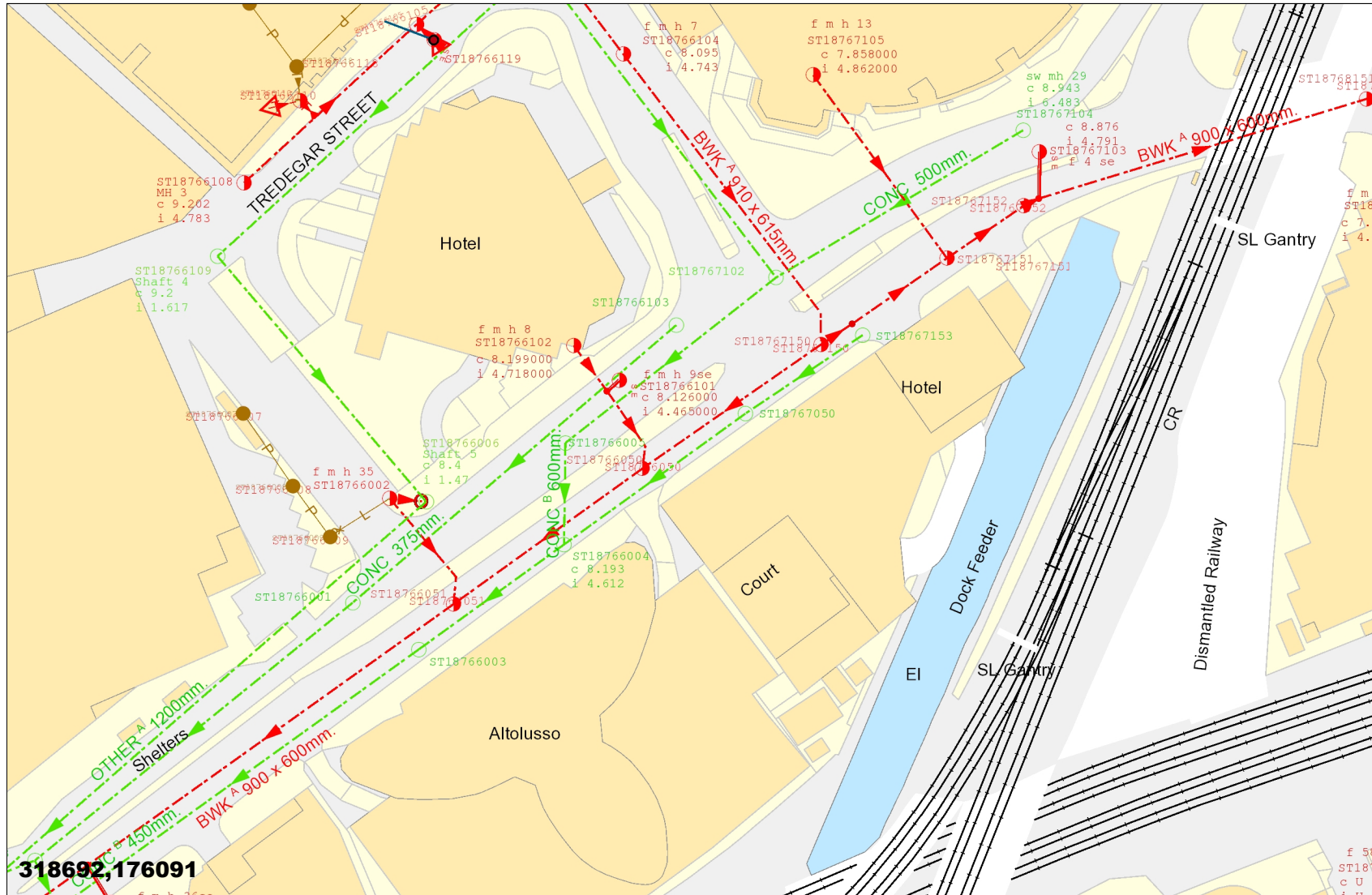
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Appendix D: Dwr Cymru Welsh Water Asset Map



Scale: 1: 1104



LEGEND

Clean Water

- Sluice Val
- Air Val, SINGLE
- Tap
- Pressure Reducing Valve
- Meter
- BULK Meter
- FH
- Cap
- Existing Main
- NON COMPANY

Sewerage External

- Foul
- Surface Water
- Combined
- Rising Main
- Private
- Treatment Works
- Pumping Station
- Special Purpose
- Unknown End
- Change, Combined Overflow
- Outfall, FOUL
- Lamp Hole, Foul
- Private Sewer Transfer
- Lateral Drain
- Inspection Chamber

Dwr Cymru Cyfyngedig ('the Company') gives this information as to the position of its underground apparatus by way of general guidance only and on the strict 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 and any onus of locating the apparatus before carrying out any excavations rests entirely on you. The information which is supplied hereby by the company, is done so in accordance with statutory requirements of sections 198 and 199 of the water industry Act 1991 based upon the best 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 drain sewer or disposal main laid before 1 September 1989, or if they do, the particulars thereof including their position underground may not be accurate. It must be understood that the furnishing of this information is entirely without prejudice to the provision of the New Roads and Street Works Act 1991 and the company's right to be compensated for any damage to its apparatus.

**EXACT LOCATION OF
ALL APPARATUS TO
BE DETERMINED ON
SITE**

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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.