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Wrexham County Council
16 Lord Street
WREXHAM
LL11 1LG

Date: 18/03/2025
Our Ref: PLA0085885
Your Ref: P/2025/0143

Dear Sir/Madam

Grid Ref: SJ383506 338465 350749
Site: Land South of Bryn Lane, Wrexham Industrial Estate, Wrexham
Development: Demolition of existing structures and erection of employment facilities (class B2/B8) with ancillary office accommodation (class B1A) including landscaping, parking, access and other associated works

We refer to your planning consultation relating to the above site, and we can provide the following comments in respect to the proposed development.

Firstly, with respect to the submitted application form and accompanying documents including the Drainage Strategy Report, we acknowledge that the development proposes to discharge foul to a mains sewer and to connect to the existing drainage system and surface water flows to be disposed via three categories; sustainable drainage system, existing water course and, a main sewer.

We note that the application includes an accompanying Pre- Application Consultation report and our response included within pages 13 and 14.

Foul Water

The proposed development site is located in the catchment of a public sewerage system which drains to Five Fords Wastewater Treatment Works (WwTW) and ultimately discharges to a river Special Area of Conservation (SAC).

We have considered the impact of foul flows generated by the proposed re-development and concluded that foul flows can be accommodated within the immediate public sewerage system, whereas the WwTW has a phosphorus consent limit in place by the 31/03/2030. However, the WwTW is currently failing to comply with the 95% quartile for its flow passed forward (FPF) performance, at the time of this consultation. Notwithstanding this, in line with the environmental regulator's National Environment Programme, we are required to deliver a scheme at the WwTW to ensure 95% quartile compliance with our FPF performance.

glas
Glas Cymru Cyfyngedig

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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.

As confirmed in our pre- application response, we have considered the impact of foul flows generated by the proposed development and concluded it is unlikely that sufficient capacity exists to accommodate the development within the immediate public sewerage system without causing detriment to the existing services we provide to our customers, or in regard to the protection of the environment. Accordingly, it will be necessary for the developer to undertake a development enabling assessment to identify a solution for mitigating the impact of the proposed development. This may include the removal of surface water flows from the immediate public sewerage system to offset the new foul flows from the development.

Surface Water

Turning to surface water drainage, as of 7th January 2019, this proposed development may be subject to Schedule 3 of the Flood and Water Management Act 2010. In the event this proposed development amounts to a total impermeable area of 100sqm or more, approval of Sustainable Drainage Systems (SuDS) features will be required in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. We note the references within the accompanying Drainage Report. However, in this instance, we would advise that there is no agreement to communicate surface water flows into the public sewerage system. Accordingly, as a material consideration within the planning process and notwithstanding the submitted application form, we would recommend a condition that specifies no surface water flows shall communicate directly or indirectly to the public sewerage system.

Asset Protection

This this site is crossed along the southerly edge by a 225mmpublic sewer with the approximate position being marked on the attached statutory public sewer record. In accordance with the Water Industry Act 1991, Dwr Cymru Welsh Water requires access to its apparatus at all times in order to carry out maintenance and repairs. Having regard to the submitted drawings 2042.P.004(E) and 2721-TCG-XX-XX-DR-C-5502, it appears the proposed development elements, for example, new drainage features, topography changes, landscape features and parking areas, would be situated directly above the public asset, which has a protection zone measured 4 metres either side of the centreline. Please note, the distance specified for this protection zone is indicative and based on industry standard guidelines. However, the depth of the asset will need to be verified on site which may infer a greater protection zone. For completeness, we recommend the developer refer to their title deeds to confirm if there are any covenants or restrictions associated with the asset(s) crossing the proposed development site.

In this instance, it appears there could be sufficient space and scope to ensure the development elements lie outside the protection zone of the asset. Therefore, it is strongly recommended that the existing site plan drawing reference 2042.P.002(B) is amended to take into account the location of the existing asset crossing the site (to align with paragraph 4.4.2 of the submitted drainage strategy report and Appendix D), and the proposed developments revised, and we respectfully request we are re-consulted on receipt of this information.

It is also recommended that the developer contact our Plan and Protect team (PlanandProtect@dwrcymru.com) to carry out a survey to verify the location of the asset(s) and establish their relationship to the proposed development.

Conclusion

Accordingly, for the reasons outlined above, we offer a **Holding response** until such time as additional/amended information has been submitted and request we are re-consulted on receipt of this information.

Our response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.

If you have any queries please contact the undersigned on 0800 917 2652 or via email at **developer.services@dwrcymru.com**

Please quote our reference number in all communications and correspondence.

Yours faithfully,

Shan Wyn Jones
Development Planning Officer
Developer Services