

Appendix 2.6: Statutory Pre- Application Consultation Consultee Comments

Ein cyf/Our Ref: CAS-220604-Z1M0

CBRE (FAO Utopia City)
10th Floor,
One St Peters Square
Manchester,
M2 3DE

Dyddiad/Date: 14 July 2023

Annwyl Syr/Madam / Dear Sir/Madam,

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

**BWRIAD/PROPOSAL: Develop employment space, retail, drive-thru facilities, a
petrol station, a hotel, and associated infrastructure and parking**

LLEOLIAD/LOCATION: Land North of Bryn Lane, Wrexham Industrial Estate

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 19/06/2023.

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 foul drainage and protected species. 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.

We also advise that based on the information submitted to date, we would ask the planning authority to include conditions regarding contaminated land on any planning permission granted. Without the inclusion of these conditions by the planning authority we would be likely to object to the planning application.

Foul Drainage and Protected Sites

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. In line with our [Planning Advice](#) (July 2022), under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments. We would therefore advise that the Local Planning Authority (LPA) should consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

We note the report (Harrison, A., Technical Note: Phosphate Assessment, Reference TE1624-TE-00-XX-TN-GE-002-V02, June 2023, Tier Environmental Ltd) is submitted in support of the above application. Section 2.6 of the report confirms that a connection to the existing Dŵr Cymru/Welsh Water (DCWW) Five Fords Wastewater Treatment Works is proposed, however Section 6 of the report states that DCWW have confirmed that Five Fords WwTW is unlikely to have sufficient headroom to accommodate the development. The report then states that an on-site wastewater treatment system has been designed in order to treat foul drainage on site which would ultimately discharge via a pumping station into an existing ditch.

Section 6.6.21 of Planning Policy Wales states 'Any development discharging domestic sewage should connect to the foul sewer where it is reasonable to do so. Development proposing the use of non-mains drainage schemes will only be considered acceptable where connection to the main sewer is not feasible...'

Government guidance on private sewerage in Welsh Government Circular 008/2018 stresses that the first presumption must be to provide a system of foul drainage discharging into a public sewer. Only where having taken into account the cost and/or practicability it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered.

We also refer you to our Planning Advice and advise you to provide the LPA with further information as identified in the section titled 'What does this mean for development proposals involving connection to public wastewater treatment works' and 'What does this mean for development proposals involving private sewage treatment systems' of that advice.

Should the LPA conclude that the proposed development is likely to have a significant effect on the SAC, we would expect to be consulted by the LPA on their Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended), if/when the application is submitted for planning permission.

Protected Species

Great Crested Newts

We have reviewed the following ecology reports submitted in support of the above application:

- Great Crested Newt Technical Appendix, Reference: 9134.007, The Environment Partnership, April 2023
- Chapter 12 - Ground Conditions and Contamination of the Environmental Statement (Environmental Statement, Prepared by CBRE Ltd. 2023)

Although the above reports have been submitted, we advise that there is insufficient information to assess potential effects on GCN, and how any effects will be avoided or mitigated. We advise that further information is required to assess the extent of adverse effects on the species and any avoidance or mitigation measures required. This must

demonstrate that the proposed development would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

We consider that it is possible that the species utilizes the application site for breeding, foraging, dispersal or sheltering purposes. In our view, we consider that construction and operational phases of the proposal have the potential to adversely affect GCN. We therefore consider the overall proposal has the potential to cause disturbance to GCN and/or loss or damage to their resting places. GCN and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and they are classed as a material consideration for planning under the provisions of Technical Advice Note 5: Nature Conservation and Planning (TAN5).

We note that Table 11.4.1 describes GCN population as being of local importance in terms of ecological receptors. However, we consider that Wrexham Industrial Estate and its environs, supports a nationally important population of GCN and therefore advise that any impacts cannot be considered as local.

We consider that the scheme constitutes a significant adverse risk to the current conservation status of the Wrexham Industrial Estate GCN population and therefore fails to demonstrate no detriment to the maintenance of the favourable conservation status of the local population of GCN. Our concerns include but are not necessarily limited to:

- a) The proposed extent of ecology areas associated with the development. We advise that at this locality the extent of ecology areas shall be at least equivalent in area to the size of the development, therefore an additional hectare should be allocated for long term species conservation purposes;
- b) Inadequate widths of the wildlife corridors along the northern boundary and through the site, insufficient detail regarding the viability and functionality of the wildlife tunnel connecting with off-site 3rd party land;
- c) Further consideration of the long-term tenure of ecology areas.
- d) Proposed approach to post development surveillance;
- e) Prevention of incidental capture/killing during the operational phase of the proposals
- f) Maintenance proposals set out appear to be tailored to SuDS specification, further information to demonstrate a clear difference in maintenance operations between SuDS features and ecology areas should be provided.

We therefore advise that additional information should be provided for the purposes of demonstrating that it will not be detrimental to the maintenance of the FCS of the GCN population at this locality. The further or amended additional information should include but not necessarily limited to:

1. Submission of details and associated plans concerning GCN avoidance and mitigation measures including: fence design, specifications and proposed locations; fence monitoring and maintenance requirements; and supervised removal of barrier fences. Submission to include proposed timescales and reporting requirement.

2. Submission of revised details concerning on-site and/or off-site compensatory proposals including plans, extent, access, current and proposed tenure. This to include the functionality of ecology area for connectivity purposes. Extent to be at least equivalent to the area of development. Details shall identify areas of terrestrial and aquatic habitat to be retained, enhanced, and created. Submission to include future tenure, timescales and reporting requirements.
3. Submission of a long-term site management plan (for a duration of *not less than 25 years**) that includes:
 - a. defined aims and objectives (including targets that can be used as key performance indicators for monitoring purposes);
 - b. habitat management prescriptions for aquatic and terrestrial habitats;
 - c. appropriate amphibian reasonable avoidance measures;
 - d. contingency prescriptions if fish and/or invasive non-native species (INNS) are detected;
 - e. site liaison, wardening, incident reporting and response arrangements;
 - f. detail of the skills and competencies required by those undertaking the works or activities including whether they require European Protected Species licenses for the activities proposed;
 - g. current and proposed changes to tenure of the ecology area (freehold tenure of the ecology area to be approved by the discharging Authority in consultation with Natural Resources Wales) to ensure appropriate control over the land is established and the effective targeted delivery of long-term actions. We would suggest the LPA consider the example provided of “responsible” under Part 7 of the Environment Act 2021.;
 - h. provision for periodic review mechanism for the Environment Management Plan; and
 - i. Reporting requirements associated with species surveillance and habitat management
 - j. Contingency measures that are capable of being implemented in the event of failure to undertake or appropriately implement / correct management or surveillance prescriptions including any required actions arising from unforeseen situations;
4. Submission of measures designed to prevent the accidental capture/killing of newts (amphibians) during operational (and decommissioning) phases of the scheme (i.e. post construction). This is essentially the installation and maintenance of an amphibian friendly surface water management system that does not include gully pots (or other similar features);
5. Details of timing, phasing and duration of construction activities and conservation measures
6. Timetable for implementation demonstrating that works are aligned with the proposed development
7. Ecological Compliance Audit, including key performance indicators (see below)
8. Post-construction monitoring plan. Monitoring plan to include:
 - a. Methodology: the [Wales Great Crested Newt Monitoring Scheme](#) shall be used with surveys being carried out on an [annual] basis;
 - b. Duration: Not less than 25 years;

- c. Surveys shall be abundance counts and habitat quality assessments using Habitat Suitability Index (HSI) scores;
- d. Identification of individuals/bodies being responsible for monitoring and reporting results;
- e. Each water body shall be individually numbered on site and added to the Wales Great Crested Newt Monitoring Scheme, (see <https://www.cofnod.org.uk/LinkInfo?ID=7>)

9. Submission of a biosecurity risk assessment (See below)

When consulted by the LPA in conjunction with a full planning application, we would advise that any subsequent consent should also be subject to the provisions of a planning obligation (Section 106 Agreement/Unilateral Undertaking). Suggested planning obligation provisions should consider the following within any preliminary “Heads of Terms” document and subsequent obligation:

- (a) A defined commuted sum and/or requirement for index-linked ground rent service charges to resource ecological surveillance, management and wardening (as informed by the updated Ecological Management Plan).
- (b) Management Plan review and update.
- (c) Funding to cover the cost of input from Public Bodies if required to review monitoring results/undertake liaison and comment on proposed Environment Management Plan Reviews.
- (d) Tenure and any proposed changes to tenure to be carried out to the satisfaction of the discharging Authority in consultation with Natural Resources Wales to ensure the implementation of long-term measures is secure.

This advice applies to the proposal in its present form. If the plans are changed in ways that may affect GCN on this site, you would need a revised ecology report that takes account of such changes. Please consult us again if any updated or revised ecology report concludes that the proposal is more likely to have an adverse impact on the GCN population and/or alters the detail or implementation of mitigation or compensation measures. Please also note that any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

Therefore, we would object to the development as currently proposed, and would recommend to the LPA that planning permission is refused until it can be demonstrated that the proposed development satisfies derogation provisions under the Conservation of Habitats and Species Regulations.

Bats

We note the ecological reports submitted in support of the above application:

- Bat Activity Survey Report, Reference: 9134.010, The Environment Partnership, December 2022
- Bat Roost Survey Report, Reference: 9134.005, The Environment Partnership, December 2022

However, we advise that the Ecological Assessment has insufficient information to assess the need for avoidance / mitigation measures.

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017. Where bats are present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three tests set out in the Regulations (Please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to “*demonstration of no detriment to the maintenance of the favourable conservation status of European protected species*”.

We advise that further information should be submitted to assess the extent of adverse effects on the bats and any avoidance or mitigation measures required. This must demonstrate that the proposed development would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

We note that the activity survey of the buildings on site confirmed no bats observed emerging from the buildings. Section 4.5 and Table 8 of the Bat Roost Survey report confirms a total of 49 trees as having moderate to high suitability for roosting bats. Section 4.6 states that trees that will be ‘unavoidably impacted by the development’ require additional survey in the form of nocturnal roost surveys and this should include lighting assessments. We concur with the report and advise that the results of the surveys should be submitted together with an assessment of the impacts of the scheme on these roost sites and proposals to avoid, mitigate or compensate for them. Where appropriate, this should be supported with detailed plans. All surveys should be undertaken in accordance with current published guidance.

In the meantime, we are unable to give you any assurance that the proposal would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Contaminated Land

We have reviewed the Scoping Report ('Request for an EIA Scoping Opinion for Land North of Bryn Lane, Wrexham Industrial Estate'; dated 2 November 2022; Net World Sports) and Chapter 12 - Ground Conditions and Contamination of the Environmental Statement

(Environmental Statement, Prepared by CBRE Ltd. 2023) and concur with the further works as proposed within Chapter 12 of the Environmental Statement.

We would advise that some of the following information could be provided with the full planning application and would negate the need for all the conditions below. However if this information cannot be provided (due to the nature of the condition – prior to occupation and/or unsuspected contamination) with a planning application then we would advise the LPA that conditions should be applied to any planning permission granted for this proposal, as follows.

Condition 1: Land Affected by Contamination - No development, shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, have been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:
 - a. all previous uses
 - b. potential contaminants associated with those uses
 - c. a conceptual model of the site indicating sources, pathways, and receptors
 - d. potentially unacceptable risks arising from contamination at the site
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance, and arrangements for contingency action.

The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

Justification: To ensure the risks associated with contamination at the site have been fully considered prior to commencement of development as controlled waters are of high environmental sensitivity; and where necessary remediation measures and long-term monitoring are implemented to prevent unacceptable risks from contamination.

Condition 2: Contamination Verification Report - Prior to the occupation or operation of the development a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance, and arrangements for contingency action, as identified in the verification plan.

The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

Justification: To ensure the methods identified in the verification plan have been implemented and completed and the risk associated with the contamination at the site has been remediated prior to occupation or operation, to prevent both future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Condition 3: Unsuspected Contamination - If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Justification: To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks.

Condition 4: Surface Water Drainage - No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Justification:

To prevent both new and existing development from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of water pollution.

Condition 5: Piling - No development, or phase of development, shall commence until details of piling or any other foundation designs using penetrative methods sufficient to demonstrate that there is no unacceptable risk to groundwater have been submitted to and approved in writing by the Local Planning Authority. The piling/foundation designs shall be implemented in accordance with the approved details.

Justification: Piling/foundation details should be submitted to ensure there is no unacceptable risk to groundwater during construction and methods/design are agreed prior to the commencement of development or phase of development

Pollution Prevention

The development site is within the Dee Protection Zone and as such if storing controlled substances as identified by the legislation above relevant thresholds, then a consent would

be required. For further information, please refer to [Natural Resources Wales / Dee Water Protection Zone](#).

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

Rachael Burke

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning

Ffôn/Tel: 0300 065 3497

E-bost/E-mail: northplanning@cyfoethnaturiolcymru.gov.uk

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.

CBRE Limited
10TH Floor
One St Peters Square
Manchester
M2 3DE

Date: 17/07/2023
Our Ref: PPA0008001

Dear Sir/Madam,

Grid Ref: 338529 351124

Site Address: Utopia City Land north of Bryn Lane Wrexham Ind Estate

Development: 2D: Proposed development at Land North of Bryn Lane, Wrexham Industrial Estate

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 an industrial unit with 3,120 employees at land off Bryn Lane and acknowledge that the site comprises of a potential windfall development with no allocated status in the Local Development Plan (LDP). Accordingly, whilst it does not appear an assessment has been previously undertaken of the public sewerage and watermain systems, we offer the following comments as part of our appraisal of this development.

PUBLIC SEWERAGE NETWORK

The proposed development site is located in the immediate vicinity of a predominantly combined public sewerage system which drains to Five Fords Wastewater Treatment Works (WwTW).

ASSET PROTECTION

This site is crossed by a public 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. However,

having regard to 'Illustrative Masterplan', it appears the proposed development would be situated within the protection zone of the public sewer measured 3 metres either side of the centreline.

Our strong recommendation is that your site layout is amended to take into account the location of the assets crossing the site and should be referred to in any master-planning exercises or site layout plans submitted as part of any subsequent planning application. Alternatively, it may be possible to divert the sewer if the developer applies under Section 185 of the Water Industry Act and we request that they contact us to discuss and consider possible solutions.

In the first instance, it is recommended that the developer carry out a survey to ascertain the location of this sewer and establish its relationship to the proposed development. Further information regarding Asset Protection is provided in the attached Advice & Guidance note.

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.

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 which states that discharge to a combined sewer shall only be made as a last resort. Disposal should be made through the hierarchical approach, preferring infiltration and, where infiltration is not possible, disposal to a surface water drainage body in liaison with the Land Drainage Authority and/or Natural Resources Wales.

It is therefore recommended that the developer consult with Wrexham 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



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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

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Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
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included in our attached Advice & Guidance note. In addition, please note that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.

FOUL WATER DRAINAGE – SEWERAGE NETWORK

We have considered the impact of foul flows generated by the proposed development and concluded it is unlikely that sufficient capacity exists to accommodate your development without causing detriment to the existing services we provide to our customers, or in regard to the protection of the environment. There are no planned reinforcement works within Dwr Cymru Welsh Water's Capital Investment Programme and therefore, at this stage, we are unable to provide you with a point of adequacy on the network.

In light of the above our recommendation is that you instruct us to undertake a Hydraulic Modelling Assessment (HMA) which is at the developer's expense and will examine the impact of the introduction of flows from your development upon the performance of the existing network and consider. Where required and appropriate, the HMA will then identify solutions and points of communication to ensure that your site can be accommodated within the system. For the developer to obtain a quotation for the HMA, we will require a fee of £250 + VAT. Please note that we will seek to control the outcomes of the HMA via appropriate planning conditions. However, in the absence of known solutions to accommodate your site we will not be able to support your development through the planning process. We therefore recommend that the HMA is undertaken in advance of a planning application being submitted, in order to avoid any subsequent delays. Further information on Hydraulic Modelling Assessments as well as any implications on the planning process is provided in the attached Advice & Guidance note.

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.

FOUL WATER DRAINAGE – SEWAGE TREATMENT

Please note that the Natural Resources Wales have recently released Planning Advice relating to increased phosphate levels in several river Special Areas of Conservation (SAC). Applications for new development in these areas need to consider the requirements set out in the planning advice and should



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form part of the local planning authority's decision making when determining planning applications.' The flows from this development would eventually drain to our Five Fords Wastewater Treatment Works which has a phosphate consent. Notwithstanding this, no problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

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,



Owain George
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.