Dŵr Cymru
Welsh Water

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

Wrexham County Council
16 Lord Street
WREXHAM
LL11 1LG

Date: 18/06/2025
Our Ref: PLA0087829
Your Ref: P/2025/0417

Dear Sir/Madam

Grid Ref: SJ404533 340589 353375
Site: Land Adjacent to Sycamore House, Wrexham Road - A534, Holt, Wrexham
Development: Outline application for erection of up to 39 dwellings (appearance, landscaping, layout and scale reserved)

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, we acknowledge that the development is in outline and several elements are reserved. The location of the proposal includes 'greenfield' land.

The proposal proposes foul water disposal via mains and surface water disposal via three measures; Sustainable Drainage, soakaway and main sewer.

The application incudes a Flood Consequences Report and no existing and/proposed drainage plans are included.

FOUL WATER

The proposed development site is located in the catchment of a public sewerage system which drains to Holt Wastewater Treatment Works (WwTW) and ultimately discharges to a river Special Area of Conservation (SAC). We would advise that this WwTW has a phosphorus consent limit in place and is currently compliant with the 95% quartile for its flow passed forward (FPF) performance, at the time of this consultation

However, 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. However, improvements for Holt

Wastewater Treatment Works (WwTW) are planned **for completion by 30/03/2030**. Accordingly, no buildings can be occupied until these improvements are implemented.

SURFACE WATER

Turning to 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'.

Dwr Cymru Welsh Water's guidance on how to manage surface water, including new developments, is set out in our position statement: Surface water management position statement | Dŵr Cymru Welsh Water. Our emphasis is on key measures to ensure compliance and alignment with both Ofwat and the Welsh Government requirements moving forward, with clear priorities highlighted for Sustainable Urban Drainage Systems (SUDS), as defined in Schedule 3 of the Flood and Water Management Act 2010. The Welsh Government has recently endorsed the significance for SUDS in that they '*offer a variety of engineering solutions that can be employed to manage surface water run-off, recognising there are differences in soil structure, water table levels and infiltration rates across Wales. The Statutory National Standards for SuDS7 outline various approved methods of managing surface water; developers will need to design and construct SuDS in accordance with the Standards in order to secure SAB approval*.'

As mentioned above, as capacity issues currently exist with the immediate public sewerage system the need to minimise additional surface water is a priority.

Accordingly, for the reasons outlined above, we require confirmation that the occupancy of the site to be restricted to the 30/03/3030 is agreeable and, that the required hierarchical strategy for the control of surface water from the site is exhausted and conclusive, with the relevant technical evidence.

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

glas
Glas Cymru Cyfyngedig

Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr 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.