Dŵr Cymru
Welsh Water

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Wrexham County Council
16 Lord Street
WREXHAM
LL11 1LG

Date: 29/12/2025
Our Ref: PLA0090085
Your Ref: P/2025/0690

Dear Sir/Madam

Grid Ref: SJ276521 327771 352274
Site: Tomlinsons Dairy, Five Crosses Industrial Estate, Minera, Wrexham
Development: Change of use of building from 'dairy only' to mixed use class B2 (general industrial) and B8 (storage and distribution)

We refer to your planning consultation relating to the above site. Further to our previous response dated 02/10/2025, we have received further information from the Applicant, including:

- Drawing ref. AB-14150-600L
- Drainage as Built Plan

Having reviewed the application details, we understand that there will be no significant new built development proposed; and that all operational activity will remain within the existing buildings or designated external areas.

It is also noted that as part of the change of use, the number of employees at the site will be reduced, therefore, the use of water and the foul drainage system will be significantly reduced compared to the former dairy use.

In light of the above, we offer the following comments.

PUBLIC SEWERAGE NETWORK

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

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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.

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. 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 preferring infiltration (PL2) and, where infiltration is not possible, disposal to a surface water body (PL3), in liaison with the Lead Local Flood Authority and/or Natural Resources Wales, or surface water sewer or highway drain (PL4) in liaison with the riparian owner and/or Local Highways Authority.

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 included in our attached Advice & Guidance note and our Developer Services website at https://developers.dwrcymru.com/en/help-advice/regulation-to-be-aware-of/sustainable-drainage-systems.

It is recommended that the developer engage in consultation with the Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please be advised that due to capacity constraints with the downstream public sewerage network, under no circumstances would we allow surface water runoff highway run-off from the proposed development to communicate directly or indirectly with the public combined sewerage system. In addition, please note, no amount of land drainage run-off is permitted to discharge directly or indirectly into the public sewerage system.

Asset Protection

In addition, this site is within close proximity to a public sewer the approximate position(s) being marked on the attached statutory public sewer/watermain 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 proposed site plan, it appears the proposed development would be situated outside the protection zone of the public sewer and therefore acceptable in principle.

Accordingly, if you are minded to grant planning consent for the above development, we would request that the following **Condition(s) and Advisory Notes** are included within the consent to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets:

Conditions
Condition 1 – Surface Water

No surface water from any increase in the roof area of the building /or impermeable surfaces within its curtilage shall be allowed to drain directly or indirectly to the public sewerage system.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

Advisory Notes

If the development will give rise to a new discharge (or alter an existing discharge) of trade effluent, directly or indirectly to the public sewerage system. A Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the process for applying for a Discharge Consent is independent of the planning process and an application for consent may be refused even though planning permission may have already been granted

In accordance with Planning Policy Wales (Edition 12) and Technical Advice Note 12 (Design), the applicant is advised to take a sustainable approach in considering water supply in new development proposals, including utilising approaches that improve water efficiency and reduce water consumption. We would recommend that the applicant liaises with the relevant Local Authority Building Control department to discuss their water efficiency requirements.

The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water industry Act 1991. 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 Gravity 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

The planning permission hereby granted does not extend any rights to carry out any works permissions required by the Water industries Act 1991. Any alterations to existing premises resulting in the creation of additional premises or merging of existing premises must also be constructed so that each is separately connected to the Company's water main and can be separately metered. Please contact our new connections team on 0800 917 2652 for further information on water and sewerage connections.

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,

Olivia Davis
Lead Development Planning Officer
Developer Services

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