Dŵr Cymru Welsh Water

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Wrexham
16 Lord Street
Wrexham
LL11 1LG

Date: 4th September 2026
Our Ref: 1002502
Your Ref: P/2026/0511

Grid Ref: 339483,350078
Site: LAND EAST OF, BRYN LANE, Wrexham Industrial Estate Wrexham, Wrexham, LL13 9UT
Development: OUTLINE APPLICATION FOR ERECTION OF BUILDING (CLASS B2 AND/OR B8

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

We note the proposal seeks outline planning permission (all matters reserved excluding access) for the erection of additional floorspace within use class b2 and/or use class b8 and ancillary offices, along with access, car parking, service yard, landscaping, ecological enhancement areas and associated works.

We have reviewed the supporting information that accompanies the planning application and note that the existing drainage ditch is proposed to be used for surface water runoff. Further information is provided within the enclosed Drainage Strategy, with full details subject to reserved matters applications.

Foul discharge drainage is proposed to be discharged to the existing public combined sewer.

Foul Water Drainage – Sewer Network

We note from the FCA & Drainage Strategy that foul flows from the development will be directed to existing public combined sewer.

We note from the Drainage Strategy prepared by Curtins that further investigations are recommended to confirm what existing drainage is present within the site to establish whether gravity connection or a pump connection is required. There are no information of the propose final foul flow rates detailed within the submission documents so this will be required as part of the forthcoming application seeking Reserved Matters Approval in order for DCWW to asses the impact of the proposal.

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Dŵr Cymru Cyf (2366777)
A limited Company registered in Wales
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However, due to capacity constraints within the network, it is unlikely that sufficient capacity exists to accommodate your 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. 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.

Given the identified constraints within the local sewerage network and the need to confirm a suitable point of connection through ongoing hydraulic modelling, conditions requiring a Hydraulic Modelling Assessment and any associated reinforcement works are considered appropriate and necessary.

No development should be occupied until a satisfactory foul drainage solution has been agreed with DCWW and any necessary infrastructure mitigation works have been delivered.

Surface Water Drainage

We note that the method of surface water disposal is via a drainage ditch located within the eastern end of the site. This discharged into a main river to the northeast and ultimately to the River Dee.

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.

Foul Drainage – Sewerage Treatment

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 would advise that this WwTW has a phosphorus consent limit and is currently compliant with the 95% quartile

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for its flow passed forward (FPF) performance, at the time of this consultation. The WwTW has a phosphates permit of 1 mg/l, due to be restricted to 0.7mg/l by 31/3/30. Please note, no problems are envisaged with Five Fords Waste Water Treatment Works for the treatment of domestic discharges from this site.

Accordingly, if you are minded to grant planning consent for the above development, we would request that the following **Conditions 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

No surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage network.

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.

No development shall commence until a scheme for the disposal of foul water has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be informed by a Hydraulic Modelling Assessment (HMA) and shall identify a suitable point of connection to the public sewerage system, and any necessary off-site reinforcement works required to accommodate the proposed development.

Thereafter, no building shall be occupied until the approved foul drainage scheme has been implemented in full, including the completion of any identified reinforcement works to the public sewerage system, and written confirmation has been provided to the Local Planning Authority.

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

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 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

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the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com.

The applicant is 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 us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

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.

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'. It would therefore be recommended that the developer engage in consultation with Bridgend County Borough Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please note, Dwr Cymru Welsh Water is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation.

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, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Dwr Cymru / Welsh Water. Please note that the issuing of a Discharge Consent is independent of the planning process and a consent may be refused although planning permission is granted.

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.

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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 sincerely,

Developer Services

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