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Wrexham
16 Lord Street
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Date: 23rd September 2026
Our Ref: 1003220
Your Ref: P/2026/0532

Grid Ref: 328824,345166
Site: AFONEITHA ROAD PEN-Y-CAE, WREXHAM, LL14 2PF
Development: ERECTION OF 8 DWELLINGS

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 that the proposal seeks the erection of 8 dwellings, intending to dispose of foul via the main sewer and surface water via sustainable drainage systems.

We therefore offer the following comments.

PUBLIC SEWERAGE NETWORK

We have considered the impact of foul flows generated by the proposed development and concluded that flows can be accommodated within the public sewerage system. We advise that the flows should be connected to the combined sewer.

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 for its flow passed forward (FPF) performance, at the time of this consultation.

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'.

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Dŵr Cymru Cyf (2366777)
A limited Company registered in Wales
Cwmni cyfyngedig wedi'i gofrestu yng Nghymru:
Linea, Fortran Road, St Mellons, Cardiff, CF3 0LT

Dŵr Cymru Welsh Water

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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.

In the absence of an accompanying surface water drainage strategy, 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

The proposed development site is crossed by a 225mm combined sewer, with their 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 proposed plans, whilst we note the proposed building would be situated outside of the protection zone of the public sewer when measured 3 metres either side of the centreline, it appears that there may be planting and paving proposed above and within the protection zone of the public sewer. We would advise that it is not permissible to locate any building, structure, trees/shrubs, ecological mitigation, SuDS features or the raising or lowering of ground levels within the protection zones of our assets. 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.

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Therefore, it is strongly recommended that the proposed plans are amended to take into account the location of the asset crossing the site and we respectfully request we are re-consulted on receipt of this information, which demonstrates that, either:

- A plan confirming that the development is outside the protection zones of the asset; or
- The layout is amended to remove development from the protection zones.

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 and establish its relationship to the proposed development.

We therefore issue a **holding objection** and welcome further dialogue with the developer.

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 sincerely,

Developer Services

Dŵr Cymru Welsh Water

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