Dŵr Cymru
Welsh Water

Developer Services
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Wrexham
16 Lord Street
Wrexham
LL11 1LG

Date: 28th September 2026
Our Ref: 1003373
Your Ref: P/2026/0445

Grid Ref: 332284,356363
Site: Miners Road Wrexham, Wrexham, LL12 0PJ
Development: ERECTION OF 1 DETACHED BUILDING (CLASS D2) AND 1 DETACHED BUILDING (CLASS B8) WITH ASSOCIATED PARKING AND SERVICING AREAS

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

Foul Drainage

We note that this application seeks development of a leisure building to provide a purpose-built indoor padel facility comprising five double courts and one single court, together with a café/social area, changing rooms and sauna, a warm-up/cool-down zone, and a viewing gallery, proposes connection of foul water to the mains sewer.

We can confirm capacity exists within the public sewerage network in order to receive the domestic foul only flows from the proposed development site. The application site drains to Gresford WwTW which is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). We can advise that Gresford WwTW has a phosphate permit. You will need to discuss this matter further with the local planning authority.

Surface Water

In terms of surface water, we note that the proposal intends to dispose of surface water via sustainable drainage systems. However, details of the proposal intended method or disposal are not included within this submission.

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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Rydym yn gwmni nid-er-elw. Mae pob ceiniog a wnawn yn mynd i ofalu am eich dŵr a'ch amgylchedd. Cysylltwch a ni yn Gymraeg neu'n Saesneg.

Dŵr Cymru Cyf (2366777)
A limited Company registered in Wales
Cwmni cyfyngedig wedi'i gofrestu yng Nghymru:
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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.

Asset Protection

In addition, this site is crossed by a public foul sewer; foul rising main; and surface water sewer, with the approximate position(s) 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.

The surface water sewer and foul sewer have a protection zone measured 3 metres either side of the centreline. The rising main has a protection zone of 4m either side of the centreline.

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 assets crossing the proposed development site.

We note that there is new native hedgerow proposed within the protection zones of the rising main; and the 2 units would be sited directly above and within the protection zones of the foul sewer and surface water 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.

In this instance, it appears the position of our assets will restrict the development to such an extent as to render it impractical. As such there will be undue risk to the development, the health and safety of its occupants, the health and safety of the

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operatives responsible to effect repairs as well as undue risk of pollution and detriment to the environment.

We note that it is the Applicant intention to divert the foul sewer. The developer will require an application under Section 185 of the Water Industry Act 1991. As this application seeks approval for the layout of the site, we are unable to support the planning application until a scheme has been technically approved for the diversion of the assets. 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 assets and establish their 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

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