Developer Services
PO Box 3146
Cardiff
CF30 0EH

Gwasanaethau Datblygu
Blwch Post 3146
Caerdydd
CF30 0EH

Tel / Ffôn: +44 (0)800 917 2652
Email / Ebost: developer.services@dwrcymru.com

Wrexham
16 Lord Street
Wrexham
LL11 1LG

Date: 21st August 2026
Our Ref: 1001810
Your Ref: P/2026/0457

**Grid Ref: 337991,349729**
**Site: ARDAGH METAL BEVERAGE, BRIDGE ROAD NORTH WREXHAM INDUSTRIAL ESTATE, WREXHAM, WREXHAM, LL13 9PS**
**Development: / EXTENSION TO EXISTING FACILITIES TO ACCOMMODATE NEW PRODUCTION LINE, ERECTION OF WELFARE AND STORE EXTENSION AND NEW EXTERNAL CANOPY WITH ASSOCIATED SITE WORKS**

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, we note that the proposal relates to an extension to existing facilities to accommodate a new production line, new welfare and store extension and new external canopy with associated site works (4,266sqm of B2 use)

We acknowledge that the development intends to utilise a private treatment package installed underground to dispose of foul; and sustainable drainage systems to dispose of surface water.

Accordingly, we offer the following comments as part of our appraisal of this development.

**Foul Drainage**

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As the proposal intends to utilise an on onsite private treatment package which later connects to mains drainage for foul water. We advise that the applicant seek advice from the in liaison with the NRW as the regulatory body for this method of drainage.

As 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

We're not-for-profit. Every single penny we make goes back into looking after your water and environment. You can contact us in Welsh or English.

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:
Linea, Fortran Road, St Mellons, Cardiff, CF3 0LT

Dŵr Cymru
Welsh Water

Developer Services
PO Box 3146
Cardiff
CF30 0EH

Gwasanaethau Datblygu
Blwch Post 3146
Caerdydd
CF30 0EH

Tel / Ffôn: +44 (0)800 917 2652
Email / Ebost: developer.services@dwrcymru.com

and an application for consent may be refused even though planning permission may have already been granted.

In terms of a connection to the mains for the disposal of domestic foul drainage, we require details of the increased volume and rates proposed as a result of the development in order to assess whether there is capacity within the public sewerage system to accommodate flows from the development.

However, given the scale of the proposal and the increased impact of foul flows generated by the proposed development and based on our current understanding of the receiving system, it is unlikely that sufficient capacity is available within the immediate public sewerage network to accommodate the proposed development flows at this time without potential detriment to existing customers or the environment.

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.

Please note that we will seek to control the identification and delivery of a solution via appropriate planning conditions and therefore recommend that a development enabling assessment analysis is undertaken in advance of a planning application being submitted, in order to avoid any subsequent delays. Please contact us to discuss further on this matter.

**Surface Water Drainage**

We note that the proposal comprises SuDS accommodating a water attenuation tank to the east of the main car park.

There is no Drainage Strategy submitted in support of the application however, we note from the Drainage Plan (ref. 008) that a separate private surface water is proposed within an outlet to a nearby waterbody.

As the proposal does not intend to connect to the public sewerage system to dispose of surface water, we have no objection to the proposal in principle.

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

We're not-for-profit. Every single penny we make goes back into looking after your water and environment. You can contact us in Welsh or English.

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:
Linea, Fortran Road, St Mellons, Cardiff, CF3 0LT

Dŵr Cymru Welsh Water

Developer Services
PO Box 3146
Cardiff
CF30 0EH

Gwasanaethau Datblygu
Blwch Post 3146
Caerdydd
CF30 0EH

Tel / Ffôn: +44 (0)800 917 2652

Email / Ebost: developer.services@dwrcymru.com

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.

**Asset Protection**

This site is crossed by public 225mm combined sewers with the approximate positions 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.

However, having regard to the proposed site plan (ref. AWF-TACP-SP-XX-DR-A-7100) (p10), it appears that the New Sewerage Treatment and timber surround fence would be would be situated within the protection zones of the public sewers measured 3 metres either side of the centreline.

We would also request that any proposed new planting (including SUDS features) within the protection zone of the public combined sewer should avoid direct planting over our assets or within the protection zone. Further information can be found in Sewers for Adoption (7th Edition).

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.

Our strong recommendation is that your site layout is amended to take into account the location of the assets crossing the site. Alternatively, it may be possible to divert the

We're not-for-profit. Every single penny we make goes back into looking after your water and environment. You can contact us in Welsh or English.

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:
Linea, Fortran Road, St Mellons, Cardiff, CF3 0LT

Dŵr Cymru Welsh Water

Developer Services
PO Box 3146
Cardiff
CF30 0EH

Gwasanaethau Datblygu
Blwch Post 3146
Caerdydd
CF30 0EH

Tel / Ffôn: +44 (0)800 917 2652

Email / Ebost: developer.services@dwrcymru.com

sewers if the developer applies under Section 185 of the Water Industry Act 1991 and we request that they contact us to discuss and consider possible solutions.

Accordingly, for the reasons outlined above, we offer a **Holding Objection** 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 sincerely,

Developer Services

Dŵr Cymru Welsh Water

We're not-for-profit. Every single penny we make goes back into looking after your water and environment. You can contact us in Welsh or English.

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:
Linea, Fortran Road, St Mellons, Cardiff, CF3 0LT