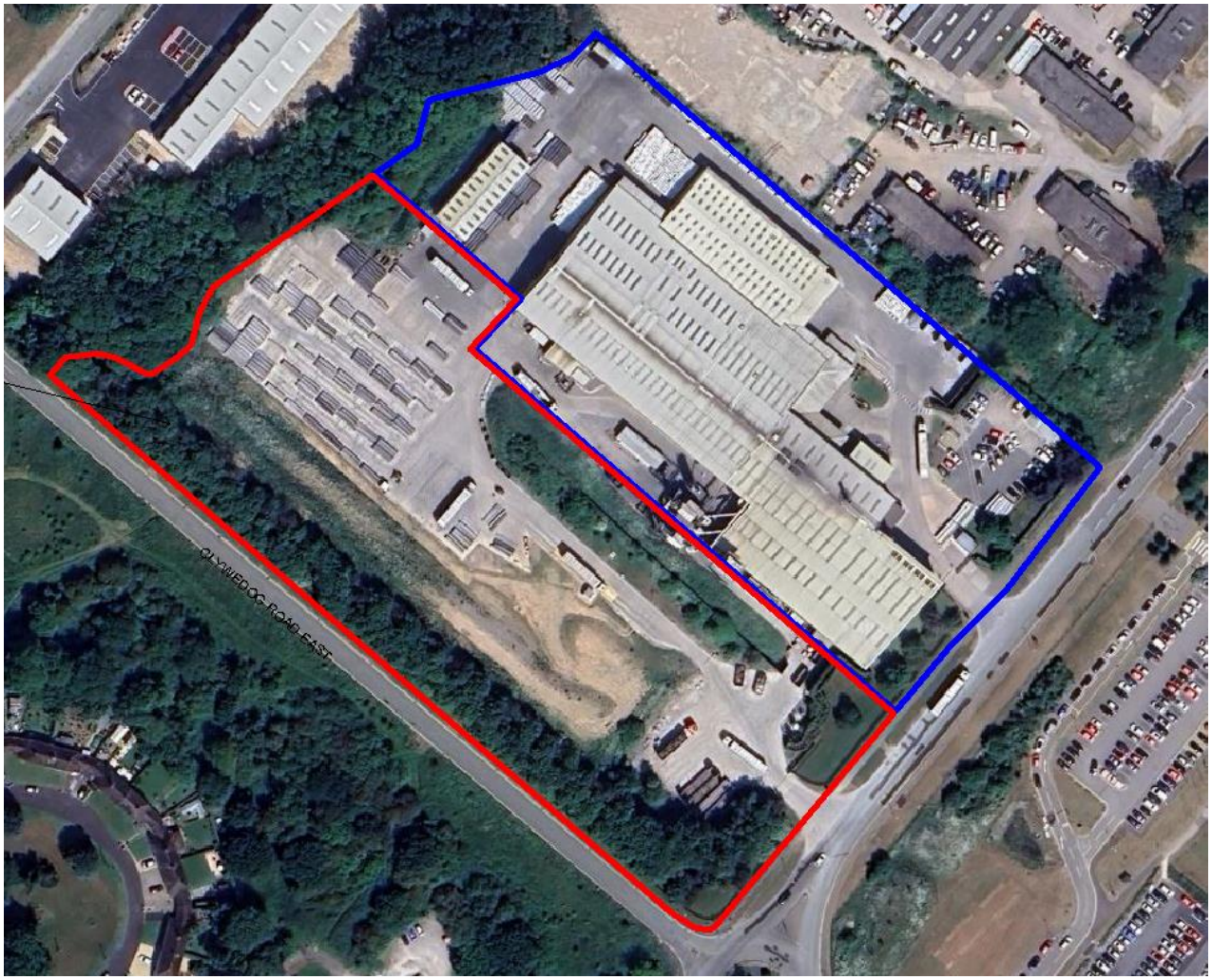
PRE-APPLICATION CONSULTATION REPORT

October 2024

For proposed metal recycling sorting facility, soil heap removal, weigh bridge relocation,concrete yard extension, landscaping and associated works at existing business premises on Bridge Road, Wrexham Industrial Estate, Wrexham LL13 9PS



FOR **Hydro Aluminum UK ltd**

BY **PACE Architecture ltd**

Neil Campbell RIBA

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1 | Introduction

This Pre-Application Consultation Report has been prepared by 'Pace Architecture ltd' on behalf of the Applicant in support of a Full Planning Application for an ancillary building at their existing business premises on Bridge Road, Wrexham Industrial Estate.

2 | Policy Requirement

The requirement to undertake pre-application consultation, set out in part 1A of the DMPWO, applies to all planning applications for 'major' development, whether for full or outline permission. The definition of 'major development' is in article 2 of the DMPWO and reproduced in Section 5 Annex 'Planning Application Classifications – Thresholds and Criteria'.
As per those classifications, each proposed unit is above 1,000m2, hence this application is classified as a 'Major Development'.
Therefore, it is a pre-validation requirement to carry out a period of pre-application consultation prior to the submission of our application, for which this Report summarises.

3 | Consultees

Requirement:

Prior to submission of an application for major development, the developer must:
- Publicise a draft of the application
- Consult community and specialist consultees
- Write a report summarising the pre-application consultation undertaken.

Response:
Consultation documents were issued directly to the Community Consultees, posted by hand to neighbours and posted adjacent to the site. (Consultees listed in Table 1 below). The list of consultees as suggested by the Local Authority.

Table 1 - list of consultees

COMMUNITY CONSULTEES	**CONTACT**	
Community Council	S. Wilson	Sent 14.06.24
Local Member	Cllor M Morris	Sent 14.06.24
Abenbyry Community Council	Serena Baxter	Sent 14.06.24
		Sent 14.06.24
SPECIALIST CONSULTEES		
Public protection	Wrexham BDC	Sent 14.06.24
Contaminated Land	Wrexham BDC	Sent 14.06.24
Wrexham Planning	Wrexham BDC	Sent 14.06.24
Highways	Wrexham BDC	Sent 14.06.24
Highways major	Palmer@mottmac.com	Sent 14.06.24
H and S Executive	HazSubCon.CEMHD5@hse.gov.uk	Sent 14.06.24

Natural Resources Wales	NRW northplanning@naturalresourceswales.gov.uk	Sent 14.06.24
Welsh Water	Welsh Water developer.services@dwrcymru.com	Sent 14.06.24
Wales and West Utilities	enquiries@wwutilities.co.uk	Sent 14.06.24
Sustainable Drainage Approving Body (SAB)	SAB Wrexham	Submitted by Norder Associates ltd

4 | Consultation Documents

Requirement:

The site notice and letters are required to identify a location in the vicinity of the site where all information will be made available. That is the information that would be required to be submitted as part of a formal planning application. This includes:

- Scaled plans, with north arrow, to identify the land to which the application relates.
- All other scaled plans, drawings and information that would be required to describe the proposed development – this includes any technical documents that would be needed in order to validate any subsequent application.
- Design and Access Statement
- Any information that would be needed in order to comply with any local validation requirements of the relevant LPA
- Draft Environmental Statement.

Response:

Specific information pertaining to each consultee was tailored as required. Figure 1 is a screenshot of the base list of information provided. Accompanying notices can be viewed in Appendix '1' & Appendix '2.'

5 | Site Notice

Requirement:

The Applicant should display site notices on or near the site and should be visible and legible to anyone passing by without the need to enter the site. The site notice is required to contain all the information set out in the form contained in schedule 1B to the DMPWO.

Response

Figure 2 shows close view of site notice (Appendix '1') positioned on the gate to the existing Bridge Road site access near to the roundabout. Figure 3 shows the site notice viewed from the edge of Bridge Road.

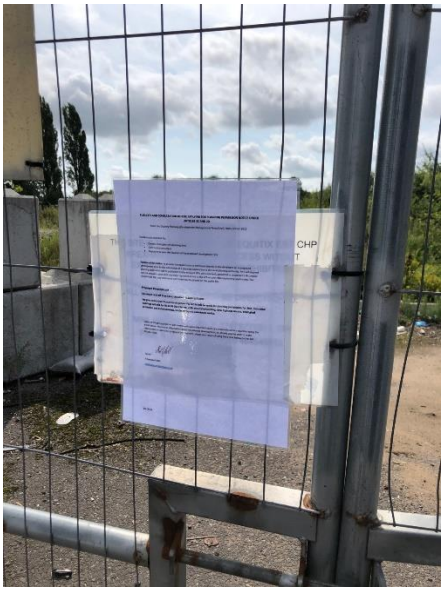


Figure 1 - Site Notice (close up in-situ)



Figure 2 - notice viewed from Bridge Road

6| Letter to Owner or Occupiers of Adjacent Land / Neighbours

Requirement:
Letters should be addressed to "the owner and/or occupier" of land adjoining the site. The letter is required to contain all the information set out in the form contained in schedule 1B to the DMPWO.

Response:
Copies of the site notice were delivered by hand to neighbours/occupiers of the site.

7 | Community Engagement Event

A community engagement event was held with the residents of Pentre Maelor Housing Estate to discuss submitted proposals along with existing operations on site. See Invite in Appendix 3

.

8 | Consultation Responses

COMMUNITY CONSULTEES	Response Received at time of PAC writing
Community Council	Received by Abenbury Community Council see below & Appendices
Local Member	Received by Councillor Morris see below & Appendices
SPECIALIST CONSULTEES	
Public protection	None received
Contaminated Land	Received 12.07.24 see below & Appendices
Highways	None received
Highways major	None received
H&S Executive	Advised to apply via other channels
Natural Resources Wales	**Comments Received 08.09.21** **ref: CAS-258267-L9V2** see below & Appendices
Welsh Water	**Comments Received 03.07.24** see below & Appendices
Wales and West Utilities	None received
Sustainable Drainage Approving Body (SAB)	None received

Councillor Morris – see Appendices for complete response

Mr Morris's comments and concerns can be summarized as follows:

- Site Noise experienced by residents, including material handling, 'tonal incidents', manufacturing,
- Earth bund and planting along Clywedog Road to be retained as visual and acoustic buffer.
- No increase of noise as a result of this development
- Automatic door closures to be incorporated, as used on existing building
- Issues experienced with lorry parking & queuing along Bridge Road South
- Dust emanating from site onto highway

Community Council – Pentre Maelor Residents – see Appendices for complete response

Following Mr Morris's initial comments a community engagement event was arranged with all community groups were invited. Following the event, Abenbury CC forwarded a summary of concerns which can be seen in the Appendices. The comments largely reflect those of Mr Morris's.

Natural Resources Pre-Application Consultee Response

Through the PAC consultation process NRW have given specific requests for further information which have now been included within this application.

- **Ecology -** Comments pertaining to ecology have been challenged by our Lead Ecologist and are addressed in a separate document.
- **Contaminated land -** Planning conditions have been suggested.
- **CEMP –** recommended for Full Application or to be conditioned
- **Foul Drainage –** Risk of increasing Phosphates into SAC, however no additional sanitary provisions are proposed as part of this application.

Welsh Water Pre-Application Consultee Response (Ref: PPA0005984)

- no objection to development
- Asset Protection, Sewerage & Surface Water – No assets within immediate vicinity. General advice given on preferred strategies and recommends consultation with SAB, NRW.

8 | Proposal Changes following Pre-Application Consultation Community Engagement Event

Concern Raised	Applicant Design Response
1. Site Noise	Automatic doors to be incorporated Doors to be closed during night time operating hours Earth bund to remain in entirety No increase of noise levels resulting from this application (refer to NIA)
2. Earth Bund & planting to be retained	Earth bund to remain in entirety. Additional planting planned (see landscape proposals)
3. Dust from site	Proposals now include extended area of concrete hard standing to remove area of unsurfaced parking which creates the dust.
4. HGV Parking & Waiting on Bridge Rd Sth	Change to site circulation to allow an increased area of hard-standing to accommodate off street parking for lorries & queuing on street.

9 | Conclusion

In compliance with Article 2D of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, this Pre-Application Consultation Report demonstrates appropriate measures of engagement have been made.

Design changes have been made to accommodate requests through the PAC process e.g. reduced developed site areas.

Additional information and reports have been included within this application following PAC advice received to date.

I hereby submit this Pre-Consultation Report for your consideration. Should you require any further information do please contact me.

Kind Regards



Neil Campbell RIBA

FOR AND ON BEHALF OF PACE Architecture ltd

PACE | ARCHITECTURE

E| neil@pace-architecture.co.uk
T| 07964 736 546

APPENDICES

APPENDIX 1 **NOTICE TO COMMUNITY INTEREST CONSULTEES**

APPENDIX 2 **NOTICE TO SPECIALIST CONSULTEES**

APPENDIX 3 **Photographs of Site Notice**

APPENDIX 4 **Consultation Event Invitation**

CONSULTEE RESPONSES

APPENDIX 5 **Councillor Morris Response**

APPENDIX 6 **Abenbury Community Council Response**

APPENDIX 7 **Natural Resources Wales Response**

APPENDIX 8 **Contaminated Land Response**

APPENDIX 9 **Welsh Water**

APPENDIX 1 - NOTICE TO COMMUNITY INTEREST CONSULTEES

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

UNDER ARTICLES 2C & 2D

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

This Notice is inteded for:

- Owners/occupiers of adjoining land
- Community Consultees
- Display on or near the loaction of the proposed development site

PURPOSE OF THIS NOTICE

To provide the opportunity to comment directly to the developer on a proposed development prior to the submsiion of a planning application to the local planning authority. Any subsequesnt planning application will be publicised by the relevant LPA; any comments provided in response to theis notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submission may be plance on the public file.

Proposed Development

On land within the curtilage of the main facility at Bridge Road, Wrexham Industrial Estate.

We give notice the Applicant, 'Hydro Aluminium UK ltd' inteds to apply for planning permission for a new metal recycling sorting facility, soil heap removal, concrete yard extension, landscaping and associated works.

Copies of the pre-application documents and supporting information are attached/can be requested using the e mail address below. Any further information about the planned development, or, should anyone wish to make representations abou the proposed development, please also respond using the conact details below by the 21st July 2024.



Neil Campbell architect

PACE | ARCHITECTURE

E| neil@pace-architecture.co.uk

APPENDIX 2 - NOTICE TO SPECIALIST CONSULTEES

NOTICE UNDER ARTICLE 2D

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

To be served on specialist consultees, as defined by article 2(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Purpose of this notice:

This notice comprises a formal request for a pre-application consultation response under article 2D of the Town & Country Planning (Development Management Procedure) (Wales) Order 2012.

Proposed Development

On land within the curtilage of the main facility at Bridge Road, Wrexham Industrial Estate.

We give notice the Applicant, 'Hydro Aluminium UK ltd' inteds to apply for planning permission for a new metal recycling sorting facility, soil heap removal, concrete yard extension, landscaping and associated works.

Copies of the pre-application documents and supporting information are attached/can be requested using the e mail address below. Any further information about the planned development, or, should anyone wish to make representations abou the proposed development, please also respond using the conact details below by the 21st July 2024.



Neil Campbell architect

PACE | ARCHITECTURE

E| neil@pace-architecture.co.uk

APPENDIX 4 – Consultation Event Invitation

HYDRO ALUMINIUM DEESIDE LIMITED
Bridge Road
Wrexham Industrial Estate
Wrexham LL13 9PS

Hydro Aluminium Consultation Event

Date: Wednesday 7th August 9.00am to 11.00 am

Location: Hotel Wrexham

We are pleased to announce a public consultation event to share our plans to expand our operations at our Aluminium Recycling Plant at Bridge Road on the Wrexham Industrial Estate.

We can already produce some of the greenest aluminium in the world and now we want to produce more of it. Our scrap sorting project is a key enabler to decarbonise the UK economy in a sustainable way. Supporting the local economy and creating new employment opportunities.

Please join us at our consultation event where we will share details of our plans and answer any questions you may have.

Hydro Aluminium Deeside Ltd
United Kingdom
T: +441978 660231
F: +441978 661125
VAT Number
406282078
Registration No.
1786117

APPENDIX 5 – Councillor Morris Response

From: Michael Morris <Michael.Morris@wrexham.gov.uk>
Sent: Thursday, July 11, 2024 10:17 AM
To: Neil Campbell <neil@pace-architecture.co.uk>
Subject: Hydro Aluminium

Dear Mr Cambell
Thank you for the details of the pre planning application on behalf of Hydro Aluminium UK Ltd, Wrexham Industrial Estate.
Having been the County Councillor for the area for some 40 years, I can recall the difficulties we had with Deeside Aluminium in terms of noise and air pollution. Complains were received daily and various measures were put in place in an attempt to mitigate issues. At that time the site monitoring was undertaken by Wrexham County Borough Council Public Protection team, but I am aware in more recent years the permitting and monitoring arrangements have been undertaken by Natural Resources Wales.
Whilst I have looked at your documentation contained in the pre application submission, I will be relying on the advice of statutory consultees when an application is submitted before coming to a conclusion on the proposal.
I would ask that you consider the general comments below as my immediate thoughts.

- Noise was always a significant factor, not just from the manufacturing process but equally from the "tonal" incidents when material was being moved around the site/factory. The community of Pentre Maelor would expect adequate measures to be in place to protect their environment given the proposal is for a sorting facility and is closer to the residential properties.
- The earth bund and associated planting on the boundary running parallel to Clywedog Road East should remain in its entirety and not be compromised or its integrity eroded. This was a welcome measure introduced some time ago and now it is fully matured is very effective.
- There are historic noise levels set which should be factored into the proposal. From memory, they were set at 47 dba nighttime at the nearest noise sensitive receptor (15 The Oval) The community would not expect to see an increase in noise nuisance as a result of the proposal.
- As part of the noise reduction measures introduced by the Company, timed, automatic door closures were installed on the external roller shutter doors to reduce the noise escape. These should be replicated in any new build.
- In recent times the, the lorry parking area has been a cause for concern, particularly since its reduction in size. The entrance is gated which results in vehicles queuing to get in and results in vehicles parking on Bridge Road South. The highway is the subject of a road traffic order (double yellow lines). The surfacing of the park is inadequate and often in dry times airborne white dust emanates from the site.
- Given the previous history of the site and bad experiences encountered by the residents, you may wish to consider a local public consultation event in an attempt to allay fears – particularly those from Pentre Maelor

Obviously, some of my comments can be considered or translated into planning conditions at a future point should the application be recommended for approval and the statutory consultees are comfortable with the proposal.
Kind regards

Michael Morris
Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.

Ewch i weld - mi fedrwch chi dalu, rhoi gwybod, gwneud cais, dweud eich dweud, a dod o hyd i wybodaeth ar-lein yn www.wrecsam.gov.uk. Arbedwch bapur - meddyliwch cyn argraffu!

Mae'r neges e-bost hon ac unrhyw atodiadau wedi eu bwriadu ar gyfer yr unigolyn neu'r sefydliad y'i cyfeirir atynt yn unig. Am yr amodau llawn ynglŷn â chynnwys a defnyddio'r neges e-bost hon, ac unrhyw atodiadau, cyfeiriwch at www.wrecsam.gov.uk/top_navigation/disclaimersw.htm

We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.

Take a look - you can pay, report, request, have your say and find information online at www.wrexham.gov.uk. Save paper - think before you print!

This e-mail message and any attachments are intended solely for the individual or organisation to whom it is addressed. For full conditions in relation to content and use of this e-mail message and any attachments, please refer to www.wrexham.gov.uk/top_navigation/disclaimers.htm

APPENDIX 6 – Abenbury Community Council Response

ABENBURY COMMUNITY COUNCIL
CYNGOR CYMUNED ABENBURY

Mr Neil Campbell
PACE Architecture

12th August 2024

Dear Mr Campbell

Re: Pre- application Consultation Notice for development at Hydro Aluminium UK Ltd, Bridge Road, Wrexham industrial Estate

Thank you for your recent correspondence concerning the pre- application consultation referred to above. I can advise that this was discussed at the most recent meeting of Abenbury Community Council. Several issues of concern were raised about the proposals, which it is hoped can be addressed at an early stage :

1. Expansion of the site operations as you set out, will, it is feared, result in a substantial increase in noise and traffic around the site which would adversely impact on the lives of residents living nearby. Noise is experienced from other places around the Industrial Estate, but few if any operations are so close to the residential area as is the Hydro plant. Therefore, it would be expected that this is accounted for in planning the location of those most noisy of operations and if necessary, reconfiguring the site, as well as putting in place such measures as would reduce this to a minimum. The proposal must not lead to an increase in noise nuisance or any other kind of nuisance such as airborne pollution, fibres etc, that would affect the health and wellbeing of residents living so close by.
2. It was further noted that currently there appears to be an ongoing issue with lorries and other vehicles queuing to access the plant along Bridge Road and Bridge Road South. Will you be taking measures to increase the turning space, parking and vehicular access to the site to accommodate your proposed operations, such that it does not cause any parking or other traffic issues that will impact on the health and wellbeing of residents living so close by?
3. Can you please ensure that the earth bund and associated planting on the boundary running parallel to Clywedog Road East will remain in place.

Clerk/Clerc: Serena Baxter **Telephone/ffon: 07470 602612**
E-mail: abenburyclerk@gmail.com
Postal Address: C/o 19 Marcella Crescent, Marchwiel, Wrexham LLI13 0RX

The matter will further be discussed the next meeting of Abenbury Community Council, when the outcomes of your recent consultation with residents, and the proposals will further be discussed, after which I will be in touch again should any further issues of concern be raised.

Yours sincerely

SJ Baxter

S. Baxter
Clerk to Abenbury Community Council

Signed on behalf of Abenbury Community Council.

APPENDIX 7 – NRW Response

Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-258267-L9V2

PACE Architecture Ltd

By email to: neil@pace-architecture.co.uk

Dyddiad/Date: 19 July 2024

Dear Sir/Madam,

STATUTORY PRE-APPLICATION CONSULTATION – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED

BWRIAD/PROPOSAL: A new metal recycling sorting facility, soil heap removal, concrete yard extension, landscaping and associated works

LLEOLIAD/LOCATION: HYDRO ALUMINIUM DEESIDE LTD, BRIDGE ROAD, WREXHAM INDUSTRIAL ESTATE, WREXHAM

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 14 June 2024.

We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding protected species and protected sites. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.

We also advise that based on the information submitted to date, we would ask the planning authority to include conditions regarding contaminated land and protected sites on any planning permission granted. Without the inclusion of these conditions by the planning authority we would be likely to object to the planning application.

Protected Species

Great Crested Newt

We note that the Preliminary Ecological Appraisal (PEA) submitted in support of the above application (Langton, D. (2023). Hydro Aluminium, Wrexham Industrial Estate: Preliminary Ecological Appraisal, Reference 9871.002, The Environment Partnership) has identified that Great Crested Newts (GCN) have been recorded in the vicinity of the application site. However, we advise that there is insufficient information included in the report regarding avoidance, mitigation and compensation measures with respect to GCN.

The proposal has the potential to kill, injure or disturb GCN, or damage or destroy their breeding sites and resting places at this site. GCN and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and Schedule 5 of the Wildlife and Countryside Act 1981. Where GCN are present and a development proposal is likely to contravene the legal protection, they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

i. The development works to be authorised are for the purpose of preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;
ii. There is no satisfactory alternative; and,
iii. The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

To avoid developments with planning permission subsequently not being granted a licence, the Local Planning Authority should take Planning Policy Wales and Technical Advice Note 5 into account when considering development proposals where a European Protected Species is present. Please note, for the purposes of providing advice at the planning application stage, our comments are limited to compliance with the third test only.

We note that Section 5.13 of the submitted report confirms a negative eDNA analysis for GCN in ponds P1-P3 and advises that works could proceed under a precautionary working method statement. However, since Wrexham Industrial Estate and its environs supports a nationally important population of GCN we advise that there is insufficient information to demonstrate that the development would not be likely to be detrimental to the maintenance of the favourable conservation status of the local population of GCN.

Therefore, when consulted by the LPA in conjunction with a full planning application, we would advise that the following details should be provided to demonstrate no detriment to the maintenance of the favourable conservation status of the local population of GCN:

(a) Compensatory habitats must be provided on at least a "like for like" basis in terms of area. Details shall identify areas of terrestrial and aquatic habitat to be maintained enhanced and created;
(b) Submission of further details and associated plans concerning GCN avoidance and mitigation measures including, but not limited to: fence design, specifications and locations; considerations of access issues; monitoring and maintenance requirements; and supervised removal. Submission to include proposed timescales and reporting requirements;
(c) Submission of a site management scheme.
(d) Submission of measures designed to prevent the accidental capture/killing of GCN in operational (and decommissioning) phases of the scheme (i.e., post construction). This is essentially the installation and maintenance of an amphibian friendly surface water management system that does not include gully pots (or other similar features).
(e) Management and monitoring plan for the SuDS ponds to include consideration of the potential need for a European Protected Species (EPS) Licence relating to proposed management prescriptions
(f) Details of timing, phasing and duration of construction activities and conservation measures.

(g) Submission of a biosecurity risk assessment.

The above should be incorporated into an appropriate Conservation Plan and be carried out in accordance with the approved details.

This advice applies to the proposal in its present form. If the plans are changed in ways that may further affect GCN on this site, you should provide a revised ecology report that takes account of such changes.

In the meantime, we would be unable to give the LPA any assurance that the proposal would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Bats

We have reviewed the ecological report (Langton, D. (2023). Hydro Aluminium, Wrexham Industrial Estate: Preliminary Ecological Appraisal, Reference 9871.002, The Environment Partnership) submitted in support of the application and concur with the bat mitigation and recommendations within Section 5.8.

Other Ecology Interests

Wrexham Industrial Estate is considered to support a nationally important butterfly interest (including dingy and grizzled skipper). One of the principal habitats supporting these species is located to the south of the application site. We note that a grizzled skipper survey has been carried out (Conops Entomology Ltd, 27/06/2023, Report reference 23.32) and we would therefore advise discussion with the Local Authority's ecologist regarding potential impacts on grizzled skippers (a species listed on Section 7 of the Environment (Wales) Act 2016).

Contaminated Land

We have reviewed the following information submitted in support of this Statutory Pre-Application consultation:

- Phase I Geoenvironmental Site Assessment Hydro Aluminium Deeside Ltd Reference:16-685-R1-2 Date: May 2024
- Phase II Geoenvironmental Site Assessment Hydro Aluminium Deeside Ltd Reference: 16-685-R2-2 Date: May 2024 prepared by E3P

We are in broad agreement with the conclusions and recommendations for further work in the Phase II report and would advise the LPA to secure this via an appropriately-worded condition. We also advise that the proposed additional work is carried out in line with the following:

1. Follow the risk management framework provided in Land contamination risk management (LCRM)
2. Refer to 'Development of land affected by contamination: A guide for developers' (WLGA, 2023) for the type of information required in order to assess risks to controlled waters from the site. The Local Authority may be able to advise on risk to other receptors, such as human health.
3. Refer to our groundwater protection advice on www.gov.uk

Furthermore, due to the previous land use on site (ammunitions production during World War II) as referred to in the Phase 1 Geoenvironmental report, we would advise the LPA that the following conditions should be applied to any planning permission granted for this proposal. Please note, if some of the following information could be provided with the full planning application instead it may negate the need for some of the conditions outlined below.

Condition 1: Land Affected by Contamination - No development, shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, have been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:
    a. all previous uses
    b. potential contaminants associated with those uses
    c. a conceptual model of the site indicating sources, pathways, and receptors
    d. potentially unacceptable risks arising from contamination at the site (largely completed)

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site (largely completed).

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance, and arrangements for contingency action.

5. The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

Justification: To ensure the risks associated with contamination at the site have been fully considered prior to commencement of development as controlled waters are of high environmental sensitivity; and where necessary remediation measures and long-term monitoring are implemented to prevent unacceptable risks from contamination.

Condition 2: Contamination Verification Report - Prior to the occupation or operation of the development a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance, and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

Justification: To ensure the methods identified in the verification plan have been implemented and completed and the risk associated with the contamination at the site has

been remediated prior to occupation or operation, to prevent both future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Condition 3: Unsuspected Contamination - If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Justification: To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks.

Condition 4: Surface Water Drainage - No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Justification: To prevent both new and existing development from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of water pollution.

The treatment and disposal of contaminated soils and groundwater is regulated by waste legislation and requires an environmental permit.

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterized both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, Natural Resources Wales should be contacted for advice at an early stage to avoid any delays

Protected Sites

River Dee and Bala Lake Special Area of Conservation (SAC)

Foul drainage

We note the application site is within the catchment of the River Dee and Bala Lake SAC. In line with our *Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation* (28 June 2024), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments. We would therefore advise that the Local

Planning Authority (LPA) should consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

We note from the information submitted that the development has the potential to increase the amount of nutrients being discharged from the site. However, we note that no information has been submitted in respect of proposed foul drainage arrangements. As such, we refer you to our Advice and advise you to provide the LPA with further information as identified in the section titled '*What does this mean for development proposals involving connection to public wastewater treatment works'* or *'What does this mean for development proposals involving private sewage treatment systems'* of that Advice.

Construction phase

We note that Section 4.4 of the Preliminary Ecological Appraisal states that the River Dee SAC is hydrologically connected to the application site via a watercourse to the north of the site connecting to the Redwither Brook which subsequently discharges to the River Clywedog and River Dee.

Section 5.3 refers to the production of a Construction Environmental Management Plan (CEMP) in order to demonstrate how nearby non-statutory designated sites and adjacent woodland and watercourses will be protected, however a CEMP has not been submitted with this application.

We concur that a CEMP should be prepared in support of the proposed development and this should include effective pollution prevention measures. If this information could be provided with the full planning application it would negate the need for a CEMP condition as detailed below. However, if this information cannot be provided with the planning application, we would advise the LPA that the condition should be applied to any planning permission granted for this proposal, as follows.

Condition 5: No development or phase of development, including site clearance, shall commence until a site wide Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include the following information:

- Construction methods: details of materials, how waste generated will be managed;
- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containment areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
- Control of Nuisances: details of restrictions to be applied during construction including timing, duration and frequency of works; details of measures to minimise noise and vibration from piling activities, for example acoustic barriers; details of dust control measures; measures to control light spill and the conservation of dark skies.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use

- Traffic Management: details of site deliveries, plant on site, wheel wash facilities
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details
- Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

Justification: A CEMP should be submitted to ensure necessary management measures are agreed prior to commencement of development or phase of development and implemented for the protection of the environment during construction.

Operational phase

Further information should be submitted with the planning application in relation to the storage of materials during the operation of the recycling facility, including recycling materials and any fuels, oils or chemicals stored on site.

Oils and chemicals must be stored under cover within bunded areas and located at least 10 metres away from any ditch or surface water drain. Spill kits must be located adjacent to chemical storage and readily available in case of spillages. Please refer to relevant GPPs:

- GPP 2 Above ground oil storage | NetRegs | Environmental guidance for your business
- GPP 26 Safe storage - drums and intermediate bulk containers | NetRegs | Environmental guidance for your business

The Local Planning Authority is a Competent Authority for the purposes of the Conservation of Habitats and Species 2017 Regulations (as amended). As such, they must not agree to any plan or project unless they are certain that it will not adversely affect the integrity of a Special Area of Conservation (SAC) / Special Area of Protection (SPA) / Ramsar site.

The Local Planning Authority should carry out a test of likely significant effects (TLSE) for the SAC, which is required under Regulation 63 of the *Conservation of Habitats and Species Regulations 2017*. This test applies to impacts on the SAC from the proposed works, either alone or in combination with other plans and projects.

If the test concludes there is likely to be a significant effect then an appropriate assessment of the impacts on the SAC from the proposed works, either alone or in combination with other plans and projects, will be required. We would be able to assist with that assessment in our role as the statutory nature conservation body under the above Regulations.

Site of Special Scientific Interest (SSSI)

NRW consider the proposals have the potential to impact upon the Afon Dyfrdwy SSSI. Providing the impact pathways referenced above for the SAC are adequately addressed, NRW consider the features of the SSSI will also be adequately safeguarded.

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our website. We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our website for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our website.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Rachael Burke
Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales

E-bost/E-mail: northplanning@cyfoethnaturiolcymru.gov.uk
Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

APPENDIX 8 – Contaminated Land Response

From: contaminatedland <contaminatedland@wrexham.gov.uk>
Sent: Friday, July 12, 2024 3:35 PM
To: Neil Campbell <neil@pace-architecture.co.uk>
Subject: FW: Pre-Application Consultation Notice for development at Hydro Aluminium UK ltd, Bridge Road, Wrexham Industrial Estate

Dear Neil

Pre-Application Consultation Notice for development at Hydro Aluminium UK ltd, Bridge Road, Wrexham Industrial Estate

The Contaminated Land Team has reviewed the proposed application and associated supporting documents available online at the link you provided below and can confirm that in regard to land contamination concerns we agree with the findings and recommendations of the Phase I Geo-Environmental Site Assessment Report dated May 2024 Ref: 16-685-R1-2 and Phase II Geoenvironmental Site Assessment dated May 2024 Ref: 16-685-R2-2 both prepared by e3p for Hydro Aluminium Deeside Ltd.

If no further investigation is undertaken before the submission of a planning application for the site then the following conditions and note to applicants would be recommended to be applied to any future planning permission. Whilst the majority of the site investigation works are complete, there are some minor works recommended within the Phase II report.

Conditions

ZP01B SITE SPECIFIC CONTAMINATED LAND – PHASED INVESTIGATION
No development shall take place until a phased site investigation of the nature and extent of contamination has been carried out and submitted to and approved in writing by the Local Planning Authority. If any contamination is found during the site investigation, no part of the development shall commence until a scheme specifying the measures that will be taken to remediate the site to render it suitable for the development hereby permitted has been submitted to and approved in writing by the local planning authority. The site shall thereafter be remediated in accordance with the approved scheme. If during the course of development any contamination is found that has not been identified in the site investigation, no further development shall take place on those parts of the site where that contamination has been found until an additional scheme of remediation has been submitted to and approved in writing by the local planning authority for those parts of the site. The relevant parts of the site shall thereafter be remediated in accordance with the additional scheme of remediation.

ZP02A VERIFICATION REPORT - CONTAMINATED LAND
Each part of the site subject to the remediation under the scheme(s) approved as part of condition @@ shall not be occupied/used until a Validation Report has been completed in respect of that part of the site and submitted to and approved in writing by the Local Planning Authority.

Note to Applicant

A11NA SITE CONTAMINATION
Further advice on compliance with condition no. @@ may be obtained by contacting the Council's Environment and Planning section on 01978 298989 or contaminatedland@wrexham.gov.uk. Should the investigation identify contamination issues that may affect receptors other than the site users

e.g. groundwater, then it is recommended that these works are also addressed in consultation with the Council's Environment and Planning section prior to commencement of works on site.

The Phase I and Phase II reports should be submitted with the planning application and if any further works are undertaken before the planning application submission then the additional report on those works should also be submitted. If a Remediation Strategy has also been devised then that should also be submitted – even if no remedial works are ultimately required then as a minimum this should cover the procedures for any unforeseen/unexpected contamination being found during the construction works. If these additional works are completed then it may be that the investigation condition is not required and only the verification report condition is needed.

Should you have any queries then please do not hesitate to contact me.

Kind regards Angela

Ms Angela Guy BSc (Hons) MSc
Swyddog Tir wedi ei Halogi
Contaminated Land Officer

01978 298771
Cyngor Bwrdeistref Sirol Wrecsam, Economi a Chynllunio , Stryt y Lampint, Wrecsam LL11 1AR
Wrexham County Borough Council, Economy and Planning, 16 Lambpit Street, Wrexham LL11 1AR
https://www.wrecsam.gov.uk/preswylwyr
https://www.wrexham.gov.uk/residents
twitter.com/cbswrecsam | twitter.com/wrexhamcbc
facebook.com/cyngorwrecsam | facebook.com/wrexhamcouncil

From: contaminatedland <contaminatedland@wrexham.gov.uk>
Sent: 28 June 2024 15:31
To: 'Neil Campbell' <neil@pace-architecture.co.uk>
Subject: RE: Pre-Application Consultation Notice for development at Hydro Aluminium UK ltd, Bridge Road, Wrexham Industrial Estate

Hi Neil, this has worked, thank you Angela

From: Neil Campbell <neil@pace-architecture.co.uk>
Sent: 27 June 2024 14:21
To: contaminatedland <contaminatedland@wrexham.gov.uk>
Subject: Re: Pre-Application Consultation Notice for development at Hydro Aluminium UK ltd, Bridge Road, Wrexham Industrial Estate

https://we.tl/t-qcTXoRG2AR

Hi Angela
Please try this one.
Many thanks
Neil

Sent from Outlook for iOS

From: contaminatedland <contaminatedland@wrexham.gov.uk>
Sent: Thursday, June 27, 2024 1:44:28 PM
To: Neil Campbell <neil@pace-architecture.co.uk>
Subject: RE: Pre-Application Consultation Notice for development at Hydro Aluminium UK ltd, Bridge Road, Wrexham Industrial Estate

Dear Neil
I have clicked on the link but it has expired, please can you allow access again?
Many thanks Angela

Ms Angela Guy BSc (Hons) MSc
Swyddog Tir wedi ei Halogi
Contaminated Land Officer

01978 298771
Cyngor Bwrdeistref Sirol Wrecsam, Economi a Chynllunio , Stryt y Lampint, Wrecsam LL11 1AR
Wrexham County Borough Council, Economy and Planning, 16 Lambpit Street, Wrexham LL11 1AR
https://www.wrecsam.gov.uk/preswylwyr
https://www.wrexham.gov.uk/residents
twitter.com/cbswrecsam | twitter.com/wrexhamcbc
facebook.com/cyngorwrecsam | facebook.com/wrexhamcouncil

From: Neil Campbell <neil@pace-architecture.co.uk>
Sent: 14 June 2024 12:27
To: public_protection_service@wrexham.org.uk; contaminatedland <contaminatedland@wrexham.gov.uk>; North Planning <NorthPlanning@cyfoethnaturiolcymru.gov.uk>; developer.services@dwrcymru.com; planning <planning@wrexham.gov.uk>; SAB <SAB@wrexham.gov.uk>
Subject: Pre-Application Consultation Notice for development at Hydro Aluminium UK ltd, Bridge Road, Wrexham Industrial Estate

Dear Consultee

Please see attached notice issued as part of our Pre-Application Consultation procedure.

All supporting drawings and documents can be found via the link below.

Should you require any further assistance please do not hesitate to contact me on this e mail address.

https://we.tl/t-SQxZqZZiBP

APPENDIX 9 – Welsh Water Response

Dŵr Cymru
Welsh Water

Developer Services
PO Box 3146
Cardiff
CF30 0EH

Tel: +44 (0)800 917 2652
Fax: +44 (0)2920 740472
E.mail: developer.services@dwrcymru.com

Gwasanaethau Datblygu
Blwch Post 3146
Caerdydd
CF30 0EH

Ffôn: +44 (0)800 917 2652
Ffacs: +44 (0)2920 740472
E.bost: developer.services@dwrcymru.com

Neil Pace
Pace Architecture
9
Bickerton Avenue
Wirral
Merseyside
CH63 5NA

Date: 03/07/2024
Our Ref: PPA0008798

Dear Mr Pace,

Grid Ref: 337537 349232
Site Address: Bridge Road, Wrexham Industrial Estate, Wrexham
Development: 2D - New metal recycling sorting facility, soil heap removal, concrete yard extension, landscaping and associated works.

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development.

APPRAISAL

Firstly, we note that the proposal relates to a new metal recycling facility at Bridge Road and acknowledge that the site is allocated within an employment area Wrexham Industrial Estate. In reference to our representations during the LDP consultation process, namely the 'Statement of Common Ground', we can confirm that an assessment has been undertaken of the public sewerage and watermains systems and informs our appraisal as follows.

Public Sewerage Network.

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

glas

Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

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.

Asset Protection

This site is crossed by a public sewer with the 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. However, having regard to the proposed site plan (figure 4), it appears the proposed development would be situated outside the protection zone of the public sewer measured 3 metres either side of the centreline and therefore acceptable in principle. Nonetheless, it is recommended that the developer ascertain the distance and relationship of the sewer to the proposed development and should be referred to for the purposes of any forthcoming planning application. Further information regarding Asset Protection is provided in the attached Advice & Guidance note.

In the first instance, it is recommended that the developer carry out a survey to ascertain the location of this sewer and establish its relationship to the proposed development. Further information regarding Asset Protection is provided in the attached Advice & Guidance note.

You are 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 you may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus in and around your site. Please be mindful that under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

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'. 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.

glas
Glas Cymru Cyfyngedig

Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in Welsh and English

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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.

It is therefore recommended that the developer consult with Wrexham County Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. 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.

In addition, please note that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.

Foul Water Drainage – Sewerage Network

We have considered the impact of foul flows generated by the proposed development and concluded that the domestic foul flows can be accommodated within the public sewerage system. We advise that the flows should be connected to the combined sewer at or downstream of manhole SJ37496102 located within the site boundary. Should a planning application be submitted for this development we will seek to control these points of communication via appropriate planning conditions and therefore recommend that any drainage layout or strategy submitted as part of your application takes this into account. However, should you wish for an alternative connection point to be considered please provide further information to us in the form of a drainage strategy, preferably in advance of a planning application being submitted.

You may need to apply to Dwr Cymru Welsh Water for any connection to the public sewer under Section 106 of the Water industry Act 1991. However, 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 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.

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.

glas
Glas Cymru Cyfyngedig

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Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

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.

Foul Water Drainage – Sewage Treatment

Please note that the Natural Resources Wales have recently released Planning Advice relating to increased phosphate levels in several river Special Areas of Conservation (SAC). Applications for new development in these areas need to consider the requirements set out in the planning advice and should form part of the local planning authority's decision making when determining planning applications. The flows from this development would eventually drain to our Five Fords Wastewater Treatment Works which has a phosphate consent. Notwithstanding this, No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at developer.services@dwrcymru.com

Please quote our reference number in all communications and correspondence.

Yours faithfully,



Owain George
Planning Liaison Manager
Developer Services

***Please Note** that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.*

glas

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Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in Welsh and English

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