Ein cyf/Our ref: CAS-268989-G6M8
Eich cyf/Your ref: P/2024/1560

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Date: 03 December 2024

Dear Sir/Madam,

PROPOSAL: DISCHARGE OF CONDITIONS 3 (CONSERVATION PLAN), 5 (CONTAMINATION), 6 (VALIDATION REPORT), 7 (MONITORING PLAN), 10 (DRAINAGE), 11 (DRAINAGE), 16 (ACCESS) AND 17 (CONSTRUCTION TRAFFIC MANAGEMENT PLAN) OF PLANNING PERMISSION P/2022/0057

LOCATION: LAND SOUTH OF, BRIDGE ROAD NORTH, WREXHAM INDUSTRIAL ESTATE, WREXHAM, LL13 9PS

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 21 November 2024.

We have concerns with the application as submitted. We do not recommend your Authority discharges conditions 5, 6 and 7 for the following reasons.

We have no objection to the discharge of condition 3.

We have no comment on the discharge of conditions 10, 11, 16 and 17.

Condition 5 (Contamination)

We generally agree with the recommendations (Section 11.4) of the (Intelligent Ground Solutions (01/10/2024) GEO2 Geo-Environmental Assessment Report, Report Reference 24/4219.A).

The report states that *"Unidentified localised areas of contamination may exist at the Site and an appropriate 'hotspot' protocol should be in place for groundworkers to act upon should such contamination be identified during the construction process (to be detailed within the Remediation & Verification Strategy)".* We note that a groundwater investigation has not been conducted in the southern area, the reason for this being given as*: "The southern area of the site was densely vegetated, as such, no access was provided in this area".*

we recommend keeping the Unsuspected Contamination Condition; which is incorporated in Condition 5 as “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. “

Condition 3 (Conservation Plan)

We have no objection to the discharge of condition 3.However, we have the following advice for the applicant.

An EPS licence is advised for the purposes of implementing the construction phase of the proposals. In addition, additional licences are advised for the purposes of implementing habitat management within the ecology area.

Section 6 concerns Monitoring and maintenance, but the background and contextual information fails to identify the Wrexham Industrial estate and its environs as being of national importance for its GCN population.

We advise the surveillance methodology accords with and results are reported through the Wales GCN Monitoring Scheme

We understand that at the end of the initial 5 year period a report will be prepared identifying future management and surveillance. We advise that this report includes biosecurity, future surveillance and actions to be carried out under an appropriate EPS licence.

Condition 6 (Validation Report)

A Validation (Remediation and Verification) Report has not been submitted. Therefore, we are unable to advise you on the discharge of Condition 6.

Condition 7 (Monitoring Plan)

A Monitoring Plan has not been submitted (if such a plan is needed). Therefore, we are unable to advise you on the discharge of Condition 7.

Other Matters

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.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our website for further details.

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

Yours faithfully,

Ruth Prichard
Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

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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.