

PRE-APPLICATION CONSULTATION REPORT

December 2021 (updated March 2023)

2No. industrial buildings suitable for B2 & B8 Use Classes, with associated parking, new highway access, ecological protection and enhancements, landscaping and associated works on land off Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT



FOR
BY

Portal Construction NW Ltd
PACE Architecture Ltd
Neil Campbell RIBA



Index

1 Introduction	page 3
2 Policy Requirement	Page 3
3 Consultees	Page 3
4 Consultation Documents	Page 4
5 Site Notice	Page 4
6 Letter to Owner or Occupier of Adjacent Land	Page 4
7 Summary of consultation responses	Page 6
8 Conclusion	Page 7

APPENDICES

APPENDIX 1	Notice to Community Interest Consultees	9
APPENDIX 2	Notice to Specialist Consultees	10
APPENDIX 3	Natural Resources Wales Consultee Response	12
APPENDIX 4	Welsh Water Consultee Response	20

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 2 new industrial units on land adjacent to Bryn Lane, Wrexham Industrial Estate.

This application is a re-submission of a now withdrawn proposal. These proposals seek to provide an enhanced scheme where comments by consultees, though the original PAC & PA, have been robustly followed. Where required, additional comments will be in red italics.

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 was suggested by the Local Authority.

Table 1 - list of consultees

COMMUNITY CONSULTEEES	CONTACT	
Community Council	S. Wilson	Sent 10.08.21
Local Member	Cllor M Morris	Sent 10.08.21
Head of Planning WBDC	David Williams	
SPECIALIST CONSULTEEES		
Public protection	Wrexham BDC	Sent 10.08.21
Contaminated Land	Wrexham BDC	Sent 10.08.21

Wrexham Planning		Sent 10.08.21
Highways	Wrexham BDC	Sent 10.08.21
Highways major	Palmer@mottmac.com	Sent 10.08.21
H and S Executive	HazSubCon.CEMHD5@hse.gov.uk	Sent 10.08.21
Natural Resources Wales	NRW_northplanning@naturalresourceswales.gov.uk	Sent 10.08.21
Welsh Water	Welsh Water_developer.services@dwrcymru.com	Sent 10.08.21
Wales and West Utilities	enquiries@wwutilities.co.uk	Sent 10.08.21
Sustainable Drainage Approving Body (SAB)	SAB Wrexham	Submitted by Muir Associates 03.08.21

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.

6 | Letter to Owner or Occupier of Adjacent Land

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:

A copy of the site notice was delivered by hand to all neighbour/occupiers of the site.

Response

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

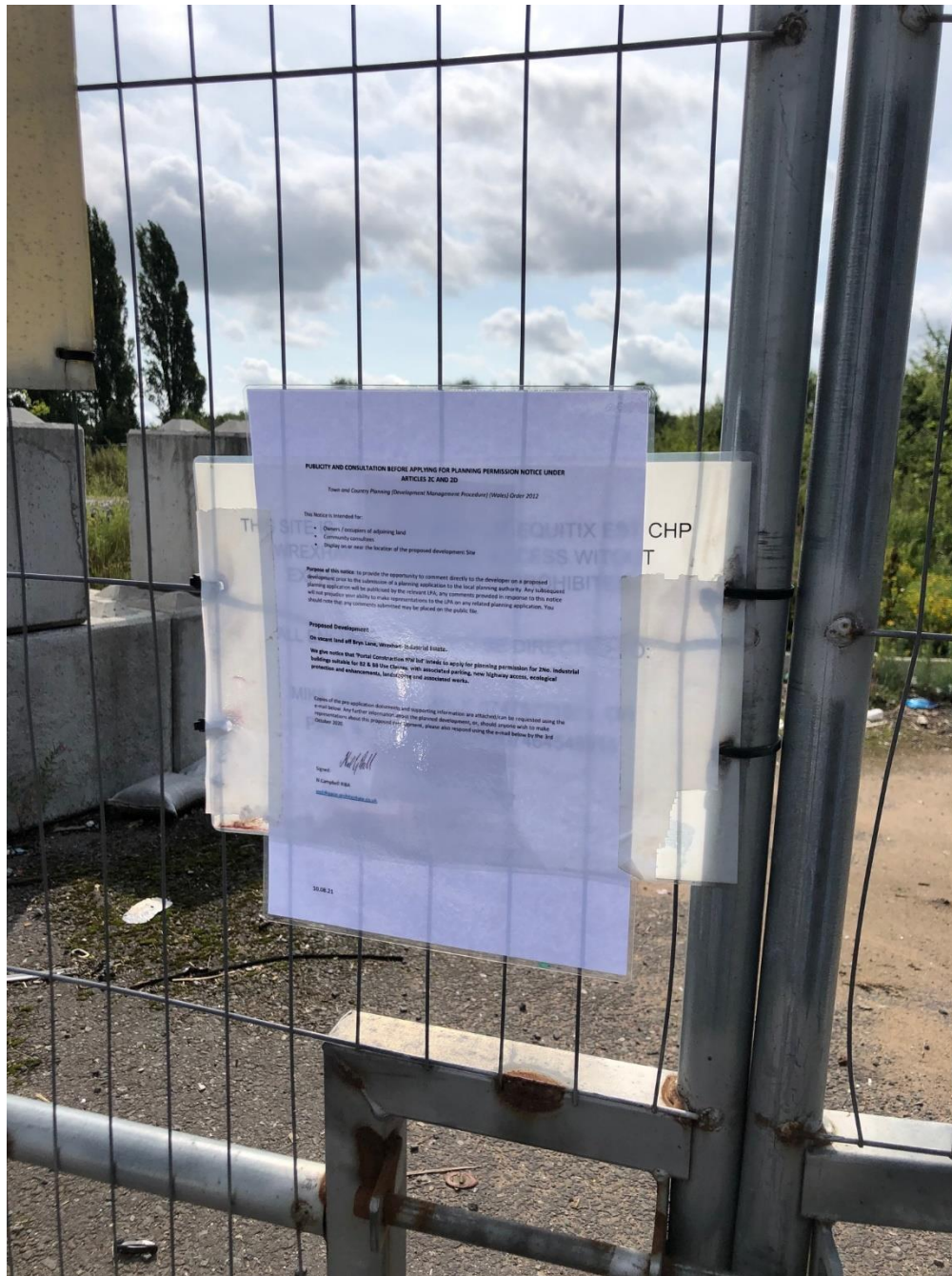


Figure 1 - Site Notice (close up in-situ)



Figure 2 - notice viewed from Bryn Lane

7 | Consultation Responses

COMMUNITY CONSULTEES	Response Received at time of PAC writing
Community Council	None received
Local Member	None received
SPECIALIST CONSULTEES	
Public protection	None received
Contaminated Land	None received
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-163333-G8Q2 see below & Appendix 3
Welsh Water	Comments Received 01.09.21 see below & Appendix
Wales and West Utilities	Linesearch info received 16.08.21 ref: 22988786 No WW plant on site. see below & Appendix 4
Sustainable Drainage Approving Body (SAB)	None received at time of writing.

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.

Specific design change requests were to provide a maximum of 50% developed area across the site, which has now broadly been achieved. Please refer to S4.2 in the 'DAS' and submitted reports & drawings for more information.

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

- no objection to development
- Gas – no plant on site.
- Sewerage & Surface Water - Gives general advice on preferred strategies and recommends consultation with SAB, NRW.

7 | 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.

Further increases of ecological mitigation have been provided to within parameters set by the Local Authority.

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

APPENDICES

APPENDIX 1 NOTICE TO COMMUNITY INTEREST CONSULTEES

APPENDIX 2 NOTICE TO SPECIALIST CONSULTEES

CONSULTEE RESPONSES

APPENDIX 3 Natural Resources Wales

APPENDIX 4 Welsh Water

APPENDIX 1 - NOTICE TO COMMUNITY INTEREST CONSULTEES

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2C AND 2D

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

This Notice is Intended for:

- Owners / occupiers of adjoining land
- Community consultees
- Display on or near the location 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 submission of a planning application to the local planning authority. Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Proposed development:

On vacant Land adjacent to Unit 6, Pacific Park, Bridge Rd, Wrexham, LL13 9PN.

We give notice that: Mr B. De Jong is intending to apply for planning permission to build 2 No. industrial buildings, suitable for B1, B2 or B8 class use, with associated parking, new highway access, landscaping and associated works.

Copies of the pre-application documents and supporting information are attached/can be requested using the e-mail below. Any further information about the planned development, or, should anyone wish to make representations about this proposed development, please also respond using the e-mail below by the 3rd October 2020.



Signed:

N.Campbell RIBA

neil@pace-architecture.co.uk

APPENDIX 2 - NOTICE TO SPECIALIST CONSULTEES

Notice under 1C 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 and Country Planning (Development Management Procedure) (Wales) Order 2012.

Proposed development: On vacant Land adjacent to Unit 6, Pacific Park, Bridge Rd, Wrexham, LL13 9PN

We give notice that Mr B. De Jong is intending to apply for planning permission to build 2 No. industrial buildings, suitable for B1, B2 or B8 class use, with associated parking, additional highway access, landscaping and associated works.

A copy of the proposed application, plans and other supporting documents are attached to this email.

In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to [the](#) e mail address below by 3rd October 2020.



Signed:

N.Campbell RIBA

neil@pace-architecture.co.uk

APPENDIX 3 - Natural Resources Consultation Response



Neil Campbell
Pace Architecture

Ein cyf/Our ref: CAS-163333-G8Q2
Eich cyf/Your ref: Bryn Lane Pre-app

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

08/09/2021

Annwyl Syr/Madam / Dear Sir/Madam,

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

PROPOSAL: 2No. industrial buildings suitable for B2 & B8 Use Classes, with associated parking, new highway access, ecological protection and enhancements, landscaping and associated works.

LOCATION: Bryn Lane, Wrexham Industrial Estate

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 13/08/2021

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, protected sites and foul drainage. 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, conditions regarding land contamination should be attached to any planning permission granted. Without the inclusion of these conditions we would object to this planning application

Protected Species

An ecological report has been submitted for the purposes of informing the planning decision making process. (Reference: Pickering, E. Ecological Assessment. TEP 2018).

The application site is not located within or adjacent to any designated sites of ecological

Croesewir goheblaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

and/or of geological interest. However, Wrexham Industrial Estate and its environs are considered to be of national importance owing to its populations of invertebrates (principally dingy and grizzled skipper) and Great Crested Newts (GCN).

We understand that the application site has previously been subject to an extant derogation licence (Reference 67880: OTH:EOPS:2015).

This scheme was partially started with no implementation of compensatory measures. The net outcome of this licence would have been to the detriment to the maintenance of the favourable conservation status of the local population of GCN.

Bats:

We consider surveys and assessments in respect of bats to be satisfactory. In our view the proposal is not likely to be detrimental to the maintenance of the favourable conservation status of any local populations of bats

We recommend you discuss any external lighting with the local authority's ecologist.

Great Crested Newts:

The application site has been subject to assessment in respect of the GCN. The ecological submission confirms the presence of this species within and in the environs of the application site.

GCN and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and they classed as a material consideration for planning under the provisions of Technical Advice Note 5: Nature Conservation and Planning (TAN 5).

In our view, the overall proposal has the potential to cause disturbance to GCN and/or loss or damage to their resting places. We therefore advise that implementation is subject to regulation under the provisions of a derogation licence.

The Regulations allow the approval of a scheme that would be likely to result in disturbance or harm to GCN, but only if satisfy an appropriate Habitats Directive derogation purpose and two tests before a licence can be issued from Natural Resources Wales.

In the case of development, the applicable derogation purpose is:

- "Preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature, and beneficial consequences of primary importance for the environment."

Furthermore, the licence can only be issued by NRW on condition that there is:

- "no satisfactory alternative", and that
- "the development will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range

Paragraph 6.3.7 of TAN 5, states that your Authority should not grant planning permission without having satisfied itself that the proposed scheme either would not impact adversely

on any GCN's on the site or that, in accordance with Paragraph 6.4.23 of Planning Policy Wales (11th Edition) the above three requirements for derogation must be satisfied when considering development proposal applications. The LPA may as part of its assessment process materially consider representations from NRW as the relevant licencing authority.

We consider that construction and operational phases of the proposal have the potential to adversely affect GCN at this site. We therefore consider that further information is required for the purposes of demonstrating the proposal is not likely to be detrimental to the maintenance of the favourable conservation status of the local population of this species of amphibian.

We therefore advise that the ecological submission is amended to incorporate, but not necessarily limited to the following information:

- (1) The submission and implementation of a dedicated long term GCN compensatory scheme. The requirements for this compensation area, include but are not limited to:
 - Size: Area of the size of the GCN compensation area must equate to the overall footprint of the development.
 - Habitat retention, enhancement and creation proposals.
 - Tenure: We advise the tenure of the GCN compensation area is transferred to the LPA or body approved by the LPA that accords with the definition of a responsible body under the Environment Bill.
 - Long term financial resource provision.
 - Long term management plan (25 years plus).
 - Long term surveillance plan (25 years plus).
- (2) Submission of a long term site management plan (for a duration of not less than 25 years) that includes defined aims and objectives; habitat management prescriptions; contingency measures if fish or invasive non-native species (INNS) are detected; proposals that are capable of being implemented in the event of failure to undertake or to appropriately implement identified or contingency actions; site liaison and wardening; licensing requirements for undertaking habitat management and surveillance; current and any proposed changes to tenure of the compensation area; persons or bodies responsible for undertaking management and surveillance together with required skills and competencies; reporting requirements; and proposed dates for updating or revising the management plan;
- (3) Submission of measures designed to prevent the accidental capture/killing of newts (amphibians) during 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);
- (4) Post construction monitoring and record dissemination for a period of not less than 25 years. All ponds to be added to the [Wales Great Crested Newt Monitoring Scheme](#), with individuals/bodies being identified as being responsible for monitoring and reporting works. Methodology shall include annual [or biennial] abundance counts

and Habitat Suitability Index (HSI) assessments. Each water body shall be individually numbered on site

We consider that the proposal currently fails to satisfactorily demonstrate that it will not be detrimental to the maintenance of the favourable conservation status of the local population of great crested newts. We consider this resolvable issue to be material to the local planning authorities planning subsequent decision-making process.

This advice applies to the proposal in its present form. If the plans are changed in ways that may affect GCN on this site, you would need a revised ecology report that takes account of such changes. Please consult us again if any updated or revised ecology report concludes that the proposal is more likely to have an adverse impact on the GCN population and/or alters the detail or implementation of mitigation or compensation measures.

Please also note that any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

Biosecurity:

We consider biosecurity to be a material consideration owing to the nature and location of the proposal. In this case, biosecurity issues concern invasive non-native species (INNS) and diseases.

We therefore advise that any consent includes the imposition of a condition requiring the submission and implementation of a Biosecurity Risk Assessment to the satisfaction of the LPA.

We consider that this assessment must include:

- (i) appropriate measures to control any INNS on site; and
- (ii) measures or actions that aim to prevent INNS

being introduced to the site for the duration of construction and operational phases of the scheme.

Ecological Compliance Audit:

We advise that any future consent includes the imposition of a condition that requires the submission and implementation of an approved ecological compliance audit (ECA) scheme to the satisfaction of the LPA.

The purpose of the Ecological Compliance Audit is to evidence compliant implementation of all ecological avoidance, mitigation and compensation works, either proposed or subject to the provisions of reserved matters conditions. The Audit shall identify Key Performance Indicators (KPIs) that are to be used for the purposes of assessing and evidence compliance.

Protected Sites and Foul Drainage

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. As part of

this package, we issued a [Planning Position Statement](#), in which we advised that any proposed development that might increase the amount of phosphate (or phosphorus) within a river SAC catchment could lead to damaging effects to the SAC. Therefore, such proposals should be screened through a Habitats Regulations Assessment (HRA), to determine whether they are likely to have a significant effect on the SAC. We have also issued [Planning Advice](#) (May 2021) which gives specific advice in respect of foul drainage arrangements for new developments.

We note from the information submitted that the development has the potential to increase the amount of phosphorus being discharged from the site. As such, we refer you to our [Planning Advice](#) and advise you to submit further information. We note that information has already been submitted in respect of connection to mains sewer. However, we advise you submit further information as identified in the bullet point list given in the section titled 'What does this mean for development proposals involving connection to public wastewater treatment works' of that advice.

Provided this advice is followed and you are able to conclude that the development is not likely to have a significant effect on the SAC, we would have no objection to the proposal. However, should you conclude that the proposed development is likely to have a significant effect on the SAC, please consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Land Contamination

Based on the information submitted to us, we have concerns with the proposed development due to historical agricultural/farm use and the surrounding drainage ditches and the underlying Secondary A and Principal Aquifers.

The following submitted report has been reviewed:

- E3P, Phase I Geoenvironmental Site Assessment, Bryn Land, Wrexham Industrial Estate, Ref 14-892-R1-1 Dated August 2021

The report recommends intrusive ground investigation to confirm the conceptual model, this is considered necessary and could be required by conditions.

In the absence of additional information being provided with any future planning application we would recommend to the local authority that they should only grant planning permission for this scheme if the conditions listed below are attached to the planning permission.

If submitted as part of planning application, we consider the above report (Ref: 14-892-R1-1) addresses Part 1 of the suggested condition 1 below. Depending on the reports submitted with the planning application the conditions requested as part of planning application process may be different.

As part of our discretionary advice service we can provide further advice relating to land contamination prior to your planning application being submitted. There is a charge for this service. Further details are available on our [website](#).

This condition has been recommended as Natural Resources Wales is satisfied that there are generic remedial options available to deal with the risks to controlled waters posed by contamination at this site. However, further details will be required in order to ensure that risks are appropriately addressed prior to development commencing.

In line with the advice given in Planning Policy Wales we understand that the Authority must decide whether to obtain such information prior to determining the application or as a condition of the permission. Should the LPA decide to obtain the necessary information under condition we would request that the following conditions are applied.

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, has been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site

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.

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 in order 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.

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 (Long term monitoring plan): Prior to the occupation or operation of the development, a long-term monitoring plan for protected sites and land contamination shall be submitted and approved in writing by the Local Planning Authority. The long-term monitoring plan should include:

- Details of the methods and triggers for action to be undertaken
- Timescales for the long-term monitoring and curtailment mechanisms e.g. a scheme of monitoring for 3 years unless the monitoring reports indicate that subsequent monitoring is or is not required (for x years)
- Timescales for submission of monitoring reports to the LPA e.g. annually.
- Details of any necessary contingency and remedial actions and timescales for actions.
- Details confirming that the contingency and remedial actions have been carried out.

The monitoring plan shall be carried out in accordance with the approved details, within the agreed timescales.

Justification: A protected sites, land contamination long term monitoring plan should be submitted prior to occupation or operation, to ensure necessary monitoring measures are approved to manage any potential adverse impacts as a result of development on protected sites.

Condition 4 (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 5 (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: This condition has been recommended as Natural Resources Wales is satisfied that there are generic remedial options available to deal with the risks to controlled waters posed by contamination at this site. However, further details will be required in order to ensure that risks are appropriately addressed prior to development commencing.

In line with the advice given in Planning Policy Wales we understand that the Authority must decide whether to obtain such information prior to determining the application or as a condition of the permission. Should the LPA decide to obtain the necessary information under condition we would request that this condition is applied.

Condition 6 (Piling):

No development, or phase of development, shall commence until details of piling or any other foundation designs using penetrative methods sufficient to demonstrate that there is no unacceptable risk to groundwater have been submitted to and approved in writing by the Local Planning Authority. The <piling/foundation designs> shall be implemented in accordance with the approved details.

Justification:

Piling/foundation details> should be submitted to ensure there is no unacceptable risk to groundwater during construction and methods/design are agreed prior to the commencement of development or phase of development.

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.

Yn gywir / Yours faithfully

Rhys Jones

www.naturalresourceswales.gov.uk
www.cyfoethnaturiolcymru.gov.uk

Page 8 of 9

APPENDIX 4 – Welsh Water Consultation Response

Welsh Water

Pace Architecture
9 Bickerton Avenue
Wrexham
CH63 5NA

Date: 1/09/2021
Our Ref: PPA0005984

Dear Sir/Madam,

Site Address: On vacant land off Bryn Lane Wrexham Industrial Estate.

Development: 2D:Portal Construction NW Ltd' intends to apply for planning permission for 2No. industrial buildings suitable for B2 & B8 Use Classes, with associated parking, new highway access, ecological protection and enhancements, landscaping and associated works.

I refer to the Schedule 1C - Article 2D notice received and your formal request for a pre-application consultation response before applying for planning permission from Dwr Cymru Welsh Water as a 'Specialist Consultee' as defined by Paragraph (y) of Schedule 4 of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. It is acknowledged that the consultation request relates to a major development site and thus seeks a substantive response within 28 days from the date of the notice, 11th August 2021, as per the requirements of Article 2E. This request includes our views on the capacity of our network of assets and infrastructure to accommodate your proposed development.

Having reviewed the details submitted I would advise there is no objection to the proposed development and offer the following standing advice which should be taken into account within any future planning application for the development:

SEWERAGE

We have considered the impact of foul flows generated by the proposed development and concluded that domestic foul flows can be accommodated within the public sewerage system

We can advise that Five Fords WwTW has a phosphate permit. This matter will need to be considered further by the local planning authority.

The proposed development site is crossed by private sewers, we would advise consulting the owner(s) of these assets prior to commencing any operational development.

Surface Water

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'. It is therefore recommended that the developer engage in consultation with Wrexham Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please note, Dwr Cymru Welsh Water is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation.

Advisory Notes

The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water Industry Act 1991. 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 Gravity 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

The applicant is 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 us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

SEWAGE TREATMENT

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site. should any trade effluent be generated by the development a separate trade effluent consent will be required.

WATER SUPPLY

We do not serve this area with a potable water supply, we would advise you consult the local water supplier.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application.

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.