

FAO Philip Forster

08/08/2018

Dear Philip,

TOWN AND COUNTRY PLANNING ACT 1990
DEDDF CYNLLUNIO GWLAD A THREF 1990

**BWRIAD / PROPOSAL: APPLICATION FOR APPROVAL OF DETAILS RESERVED BY
CONDITIONS IMPOSED UNDER PLANNING PERMISSION P/2018/0053
LLEOLIAD / LOCATION: RUABON BUSINESS PARK, SITE ADJACENT TO A483,
RUABON, WREXHAM**

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 19/07/2018. NRW notes the information relating to the planning conditions.

We recommend that you should only grant discharge of Condition 12 if it can meet the following requirements, to address significant concerns that we have identified. We do not object to the discharge of Conditions 31 and 32.

Requirement: Additional information with regard to the drainage arrangements is required prior to the discharge of Condition 12.

Condition 12 (drainage arrangements)

We object to the discharge of condition 12 due to the lack of information provided in the submission

There is no information provided on how foul water is being dealt with at the site. NRW are aware that there are often issues with the foul sewer (leaking/overflowing) at location: SJ 30154 43509. This is likely to be a Welsh Water foul sewer line and is NOT on the site of the proposed development. However, with a significant increase in number of houses and commercial premises just along the road, it is likely to add pressure to the foul sewer. We would therefore advise that you consult Dwr Cymru/ Welsh Water in order to ensure that sufficient capacity is available to accommodate development.

Condition 12 covers surface water drainage for the whole site but there is a lack of information in the submitted information over how the petrol filling station and car wash area will be drained. Given the potential risk of pollution to groundwater from hazardous

substances we require further detail on the drainage arrangements for this area. The applicant should note that Groundwater Protection Position Statements G11 - Discharges from areas subject to contamination applies to drainage from petrol station forecourts:

Discharges of surface water run-off to ground at sites affected by land contamination, or from sites used for the storage of potential pollutants are likely to require an environmental permit.

This applies especially to sites where storage, handling or use of hazardous substances occurs (for example, garage forecourts, coach and lorry parks/turning areas and metal recycling/vehicle dismantling facilities). These sites will need to be subject to risk assessment with acceptable effluent treatment provided.

If soakaways are proposed to discharge surface water from the petrol filling station and car wash then an environmental permit would be required.

We note the use of oil separators on the soakaways – further information is required on these. Are these full retention or bypass separators? Has the possible risk of hazardous substances entering shallow groundwater (which is at around 2-3mbgl based on the site investigation) been assessed?

Condition 12 requires an assessment to be made into the potential of utilising sustainable urban drainage scheme (SuDS) - the information submitted with the application to discharge this condition makes no reference to the potential for using SuDS.

We also advise that you forward details provided in relation to Condition 12 to Wrexham Lead Local Flood Authority for formal consultation and review.

Condition 31 (contamination assessment)

We have reviewed the following reports:

- Carter Jonas, Ruabon Park, Wrexham, Phase 1 Contamination Assessment Report. MLM International, November 2015. Ref: 773135-REP-ENV-001
- Carter Jonas, Ruabon Park, Wrexham, Phase 2 Preliminary Geoenvironmental Assessment Report. MLM International, November 2015. Ref: 773135-REP-ENV-002
- Earth Environmental & Geotechnical. Geoenvironmental Investigation. Ruabon Park, Feb 2018. Report Ref: A2352/18

The site has had a predominantly greenfield previous land use and the results of groundwater testing did not reveal any contamination of controlled waters which requires further investigation and remediation. We would therefore have no objection to the discharge of Condition 31

Condition 32 (verification report)

As no remediation is required of controlled waters we have no objection to the discharge of Condition 32.

Please do not hesitate to contact us if you require further information or clarification on any of the above.

Our comments above only relate specifically to matters that are included on our checklist “Natural Resources Wales and Planning Consultations” (March 2015) which is published on our website: (<https://naturalresources.wales/planning-and-development/planning-and-development/?lang=en>). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance. The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.

Yn gywir / Yours sincerely,

Daniel Davies

Daniel Davies

Cynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales