

16th October 2018

For the attention of Phillip Forster

Dear Sir,

PROPOSAL: ERECTION OF A SINGLE INDUSTRIAL UNIT, SUITABLE FOR B1 AND B2 OR B8 CLASS USE WITH ASSOCIATED PARKING, LANDSCAPING AND INFRASTRUCTURE.

LOCATION: ADJACENT TO BRIDGE NORTH BUSINESS PARK, WREXHAM INDUSTRIAL ESTATE, WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above.

NRW can confirm that the revised proposals submitted 30th September 2018 to the LPA addresses our significant concerns expressed in respect of this proposed development.

We consider that it would be helpful if an updated package is prepared that combines and summarizes all of the component amendments to this proposals that have been discussed with my colleague Matthew Ellis.

Notwithstanding the above the remaining of our previous response dated 10th May 2018 remains valid and re-iterated below for convenience:

Condition 1: Submission and implementation of a Biosecurity Risk Assessment to the satisfaction of the LPA.

Condition 2: Submission and implementation of an approved ecological compliance audit (ECA) scheme to the satisfaction of the LPA

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 are aware of invasive species such as Himalayan Balsam and Japanese knotweed being recorded in the environs of the application site (on the banks of the River Clywedog). 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.

Condition 1: 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.

Condition 2: 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 (KPI's) that are to be used for the purposes of assessing and evidence compliance.

Landfill

According to our records the proposed development site is located near to land that is, or has been, used for the deposition of waste material (Pont y Capel Lane). We would therefore advise you to consult with the local authority's Environmental Health and Building Control Departments, as they may hold detailed records, and may wish to make appropriate recommendations in respect of landfill gas investigation/remedial work. The developers should be made aware of the existence of the landfill site(s) so that they can decide whether or not to make their own investigations into the presence of landfill gas. It should also be noted that Waste Management Paper 27 states "It has been found that many sites which have taken only supposedly 'inert' waste have produced gas".

Pollution Prevention

During the construction phase the developer should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages. For further guidance please visit

[http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environmentagency](http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environmentagency.gov.uk/business/topics/pollution/39083.aspx)

[gov.uk/business/topics/pollution/39083.aspx](http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environmentagency.gov.uk/business/topics/pollution/39083.aspx) where you can find "Working at construction and Demolition Sites, Pollution Prevention Guidance 6".

If waste material is to be used for construction purposes, the activity must be registered with Natural Resources Wales. For further information please visit the website <https://www.gov.uk/government/collections/waste-exemptions-using-waste>

Any movement of waste material must be accompanied by a waste transfer notes to comply with the Waste duty of Care regulations.

Foul Drainage

No Information on foul drainage has been supplied we strongly recommend consultation with the utility provider to confirm that the sewerage and sewage disposal system serving the development has sufficient capacity to accommodate the additional flows generated as a result of the development this is to ensure that the development does not cause pollution of the water environment or potential deterioration in the Water Framework Directive classification.

Where proposed development is located within publicly sewered areas, connection should be made to the public sewer. The installation of private sewage treatment facilities within public sewered areas is not normally considered environmentally acceptable because of the greater risk of failures leading to pollution of the water environment compared to public sewerage systems.

Section 12.4.2 of Planning Policy Wales states ‘Development proposals in sewered areas must connect to the main sewer, and it will be necessary for developers to demonstrate to local planning authorities that their proposal site can connect to the nearest main sewer.’

Please note, a lack of capacity, or plans to improve capacity in the sewer, is not a valid reason for a sewerage undertaker to refuse connection under Section 106 of the Water Industry Act 1991 and we may refuse to issue an environmental permit or exemption for private treatment facilities in such circumstances

Flood Risk Management

The proposal site lies entirely within Zone A as defined by the Development Advice Map (DAM) referred to under Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map, which is updated on a quarterly basis, confirms the site to be within this zone which is considered to be at little or no risk of fluvial or tidal/coastal flooding.

Wrexham County Borough Council drainage department in their capacity as lead local flood authority may be able to advise on any local problems in relation to surface water disposal and any associated flood risk.

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

Our comments above only relate specifically to matters that are listed in our ‘Consultation Topics’ document (September 2018) which is published on our website: (<https://cdn.naturalresources.wales/media/686847/dpas-consultation-topics-august-2018-eng.pdf?mode=pad&rnd=131819256840000000>). 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.

Yours faithfully,



Ruth Prichard
Development Planning Advisor
Development Planning Advisory Service