Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-65951-N7F3
Eich cyf/Your ref: P/2018/0557

northplanning@cyfoethnaturiolcymru.gov.uk

30/07/2018

Annwyl/Dear Matthew Phillips,

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

PROPOSAL: OUTLINE PLANNING APPLICATION FOR RESIDENTIAL DEVELOPMENT OF TWO PARCELS OF LAND (NORTHERN PARCEL FOR UP TO 61 NO. DWELLINGS, SOUTHERN PARCEL FOR UP TO 71 NO. DWELLINGS), EXTENSION TO COMMUNITY PARKING FACILITY (IN ASSOCIATION WITH NORTHERN PARCEL) WITH ASSOCIATED MEANS OF ACCESS AND ALL OTHER MATTERS RESERVED WITH INDICATIVE PROVISION MADE FOR PEDESTRIAN CROSSING, PEDESTRAIN LINKAGES, PUBLIC OPEN SPACE AND AFFORDABLE HOUSING
LOCATION: Land to the North and South of Lane Farm, Rossett Road, Trevalyn, Rossett (major) P/2018/0560 V2

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which was received on 20/07/2018.

NRW does not object to the proposal. In our opinion, as explained below, the proposal is not likely to adversely affect any of the interests listed.

Protected Species

Protected species and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

The application is supported by an ecological report (Reference: Roe, R. (2016). Holt Road, Rossett: Ecological Assessment. Kingdom Ecology. Unpublished).

It is NRW's view that the ecological submission is satisfactory for the purposes of informing the planning decision making process.

NRW consider the proposal is

- not likely to be detrimental to the maintenance of the favourable conservation status of any local populations of European protected species; and
- not likely to adversely affect any local populations of British 'fully' protected species

NRW, therefore, have no objection to the proposals and welcome the implementation of submitted recommendations.

The applicant should be advised that should protected species be discovered at any stage during the works, all work should stop immediately and NRW contacted for further advice

Flood Risk

We would advise that the majority of the site is within zone A and partially within zone B as per the Development Advice maps accompanying TAN15: Development and Flood Risk.

The application is supported by a Flood Consequence Assessment (Waterco Consultants. June 2018 2nd Issue) which addresses fluvial flooding by stating that the adjacent (off-site) extreme flood zone boundary is 600mm below adjacent site levels. Although the flood zones are based on a nationalised modelling technique and are not site specific, we appreciate that the Extreme Flood Outline (0.1% or 1 in 1000) used flow values much greater than the 1% plus climate change allowance design event required to be flood free. We would however strongly advise that your colleagues acting as the Lead Local Flood Authority should be consulted regarding the surface water flood risks associated with the proposal. We do not provide advice on surface water flood risk or any localised flood risk issues (along with surface water drainage arrangements).

Environmental Management

The development is proposed approximately 180 metres north of the River Alyn, which is a WFD waterbody. Its reference no. = GB111067052173. It is currently classified as 'moderate' and is failing to reach its target of 'good ecological status'. Whilst the river is a reasonable distance away from the development site, it is worth considering the 'main river' as part overall operations

The site borders a designated site - Nitrate Vulnerable Zone (NVZ). It is not expected that the development will have any significant impact on this feature.

With regards to foul drainage we note that connection is to be made to the mains sewer. Should these plans be changed then we would wish to be re-consulted.

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 included on our checklist "Natural Resources Wales and Planning Consultations" (March 2015) which is published on our website:
(https://naturalresources.wales/media/5271/150302-natural-resources-wales-and-planning-consultations-final-eng.pdf). 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.

Advice for the Developer:

Groundwater

The proposal site is within a source protection zone (SPZ).

- Discharge of clean roof water to ground (G12)

The discharge of clean roof water to ground is acceptable both within and outside SPZ1, provided that all roof water down-pipes are sealed against pollutants entering the system from surface run-off, effluent disposal or other forms of discharge. The method of discharge must

not create new pathways for pollutants to groundwater or mobilise contaminants already in the ground. No permit is required, if the above criteria can be met.

- Sustainable Urban Drainage Systems (G13)

The Government's expectation is that sustainable drainage systems (SuDS) will be provided in new developments wherever this is appropriate. NRW supports this expectation.
Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:

- be suitably designed
- meet Governments non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with Planning Policy for Wales
- use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater

Where infiltration SuDS are proposed for anything other than clean roof drainage (see G12) in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

This position statement G13 needs to be read in conjunction with position statement G10.

Waste

Any waste excavation material or building waste generated in the course of the development must be disposed of satisfactorily and in accordance with Section 33 and 34 of the Environmental Protection Act 1990. Carriers transporting waste from the site must be registered waste carriers and movement of any Hazardous Waste from the site must be accompanied by Hazardous waste consignment notes.

Suitable pollution prevention measures will need to be in place during construction to minimise any risk of pollution, in particular giving the close proximity of watercourses.

In particular, we refer you to the Pollution Prevention Guidelines

PPG1: Understanding Your Environmental Responsibilities – Good Environmental Practices
PPG6: Working at construction and demolition sites
GPP13: Vehicle washing and cleaning

The Guidance are available at the following link:

http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/

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,

Siôn M Williams

Siôn M. Williams
Ymgynghorydd Cynllunio Datblygu / Development Planning Advisor
Cyfoeth Naturiol Cymru / Natural Resources Wales