



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-64226-C0G9

Eich cyf/Your ref: P/2018/0481

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Ffôn/Phone: 03000 65 4099

28/06/2018

Annwyl / Dear Mared,

BWRIAD / PROPOSAL:

DEMOLITION AND REMOVAL OF EXISTING RESERVOIR ROOF STRUCTURE AND BUILDINGS, INSTALLATION OF TWO NEW RESERVOIR TANKS, VALVE HOUSE, NEW SITE ACCESS, CLOSURE OF EXISTING ACCESS, RETAINING STRUCTURES, EMBANKMENTS, FENCING AND LANDSCAPING

LLEOLIAD / LOCATION:

Sugn Y Pwll Service Reservoir, Tower Hill, Garth, Wrexham

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 12/06/2018.

We recommend that you should only grant planning permission if you attach the following conditions. These conditions would address significant concerns that we have identified, and we would not object provided you attach it to the planning permission.

Condition 1: A Construction Environmental Management Plan (CEMP) should be submitted prior to construction, to the satisfaction of the LPA.

Condition 2: Submission and implementation of a Biosecurity Risk Assessment to the satisfaction of the LPA.

Construction Method and Pollution Prevention

Additional information is required in relation to construction/ demolition method and pollution prevention.

A Construction Environmental Management Plan (CEMP) should demonstrate how potential environmental impacts of construction/ demolition of the development will be managed.

The CEMP should secure all relevant mitigation measures, identify and seek to implement relevant Guidelines for Pollution Prevention, Biosecurity Risk Management, Soil Protection

and Management and demonstrate how constraints and restrictions on the project will be adhered to through demolition/ construction.

The applicant is advised to follow the guidance within the Guidance for Pollution Prevention 5 "Works and maintenance in or near water":

http://www.netregs.org.uk/media/1418/gpp-5-works-and-maintenance-in-or-near-water.pdf?utm_source=website&utm_medium=social&utm_campaign=GPP5%2027112017

During the construction phase of the proposals, any waste material which is to be removed from the site should be done so via a registered waste carrier. The waste must be taken to a facility which holds an appropriate exemption or environmental permit to accept the specified waste.

Any waste material which is removed from the site should be carried out in accordance with the duty of care requirements. All appropriate paperwork and documentation should be completed by the parties involved. Details of all waste carriers, permitted and exempt sites can be found electronically via the public registers section of our website www.naturalresourceswales.gov.uk or by contacting our customer contact centre on 0300 065 3000.

Any work which is to take place should be done so with pollution prevention in mind. Pollution prevention advice and guidance can be found via this link:

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

Protected Species

The application has been supported by the following ecological submissions. (Holden, W. (2018). Sugn Y Pwll Service Reservoir: Preliminary Ecological Survey. RSK. Unpublished. Hall, J. (2018). Sugn Y Pwll Service Reservoir: Initial Bat Survey. RSK. Unpublished; Hall, J. (2018). Sugn Y Pwll Service Reservoir: Bat Emergence Survey. RSK. Unpublished)

We consider the ecological surveys and assessments to be satisfactory for the purposes of informing the planning decision making process. We 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 likely to adversely affect any local populations of British 'fully' protected species. We therefore have no objection to the proposals. I would welcome ecological recommendations being subject to the imposition of suitable planning conditions.

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.

Reservoir Safety

The current Sugn-y-Pwll Reservoir is not registered as a large raised reservoir, and from the drawings available it appears to have a capacity of 5,570 cubic metres which is below the threshold for registration. The proposed construction is also for a reservoir which would not be liable for registration. The Reservoirs Act 1975 does not apply to such structures however we advise that the principles of this law are applied and a qualified civil engineer appointed to supervise the design and construction of the alterations.

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