



**Cyfoeth
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Ein cyf/Our ref: CAS-20858-D6G4
Eich cyf/Your ref: P/2016 /0630

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Sharon Holman
Planning Control Department
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Date: 2nd August 2016

Dear Ms Holman,

**OUTLINE PLANNING APPLICATION (WITH ALL MATTERS RESERVED APART FROM ACCESS) FOR ROADSIDE SERVICES INCORPORATING A PETROL FILING STATION WITH ANCILLARY KIOSK, FAMILY PUB/RESTAURANT, DRIVE-THRU RESTAURANT AND ASSOCIATED CAR PARKING
LAND WEST OF WREXHAM GOLF CLUB, HOLT ROAD, LLANYPWLL, LL13 9SB**

Thank you for consulting us on the above application, which we received on the 6th July 2016.

We have significant concerns with the proposed development as submitted. We recommend that you should only grant planning permission if the scheme can meet the following requirements. We would object if the scheme does not meet these requirements:

Requirement 1 – that confirmation be sought whether fuel is to be stored above or below ground, and if underground, its justification.

Requirement 2 – that confirmation be sought that if fuel is stored below ground the storage tanks will be located above the water table.

Groundwater Quality

Petrol filling station

We advise that the developers refer to the Environment Agency's Groundwater protection: Principles and practice (GP3). We draw attention in particular to Section D: Storage of Pollutants.

Further information is required from the developers on the construction of the petrol filling station. Are the fuel tanks intended to be above ground or below ground? Please note, in line with position statement D1, D2 and D3 in GP3, we object to underground storage of fuel.

We will agree to such storage (on principal, and secondary aquifers outside SPZ1) only if there is evidence of overriding reasons why:

(a) the activity cannot take place on unproductive strata, and

(b) the storage must be underground (for example public safety), in which case we expect the risks to be appropriately mitigated, as noted below.

For all storage of pollutants underground we expect operators to adopt appropriate engineering standards, meet the requirements of PPG 27: Above ground oil storage tanks as a minimum standard and have effective management systems in place. These should take into account the nature and volume of the materials stored and the sensitivity of groundwater, including the location with respect to source protection zones.

Note, we will object to storage of hazardous substances below the water table in principal or secondary aquifers.

This site lies within the designated Dee Water Protection Zone. The storage or use of controlled substances at the site, due to the quantities of fuel stored on site, may require a formal consent from the NRW, under the Water Resources Act 1991. It is the developer's responsibility to ensure that this matter is discussed with NRW should planning permission be granted. Further guidance regarding this requirement is available at:

<https://www.gov.uk/government/publications/consent-for-a-controlled-activity-within-the-river-dee-water-protection-zone>

Drainage from any areas used for delivery vehicles, servicing, washdown or waste storage purposes must drain to the foul sewer.

NRW recommends that a comprehensive emergency plan be in place to deal with any potential pollution incident that occurs at the site.

Land contamination

We have looked in particular at the 'Geo-Environmental Report' dated June 2016, report reference CRM.413.106.GE.R.001.C, by Enzygo. The report included a Phase 1 Desk Study with limited intrusive investigation and a Preliminary Risk Assessment. No previous potentially contaminative uses were identified and no potential risks to controlled waters were found. Therefore, we have no comments with respect to historic land contamination.

Flood Risk

The application site lies entirely within Zone A as defined by Welsh Government's Development Advice Map as referred to under TAN15: Development & Flood Risk. Our Flood Map information confirms that the site lies outside of the extreme flood risk outline.

The proposed scale of the development has the potential to increase flood risk both on site and off site if surface water runoff is not effectively managed. We note from the Applicant's completed application form that it is their intention to direct surface water run-off to "main sewer". If this is the case, then we would strongly recommend that you consult Dwr Cymru / Welsh Water on this application, so that they can comment on the acceptability of such a proposal.

Contrary to their planning application form, and as part of their planning submission, the Applicant has provided an indicative drainage layout plan showing how Sustainable Drainage Systems (SuDS) could be utilised to manage surface water runoff from the development. The submitted ground investigation report shows that limited on-site infiltration testing has been undertaken

across the site, but initial investigations suggests that ground conditions are conducive to such techniques. We would therefore recommend that you consult your Drainage Department, who act as Lead Local Flood Authority, as they may require additional information to be submitted by the Applicant to demonstrate that an effective method of surface water disposal is viable across the entire development site. The Lead Local Flood Authority may also recommend the imposition of appropriate planning conditions, to ensure that a sustainable and effective surface water drainage scheme is delivered as part of the development, and that controls are in place to ensure that any scheme remains operational and effective over its lifetime.

Protected Species

The application is supported by an ecological survey and assessment, reference Lusby, N. (2016). Roadside Service Area, Holt Road, Wrexham: Extended Phase 1 Survey. BSG Ecology. Unpublished.

We consider the submitted survey and assessment to have been completed to a satisfactory standard, and agree with the conclusions. In our view the proposal is not likely to be detrimental to the maintenance of the favourable conservation status of any local populations of European protected species.

Landscape

The proposal does not affect landscapes within NRW's remit.

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

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Deialu uniongyrchol/Direct dial: (0300) 065 3786 **Siaradwr Cymraeg / Welsh Speaker**



cc: DPP