

Wrexham County Borough Council
Planning Officer
16 Lord Street
Wrexham
LL11 1LG

Date: 4th July 2016

Dear Sir/Madam,

**RE DEVELOPMENT OF SITE TO COMBINE INFANTS AND JUNIOR SCHOOL INCLUDING
NEW VEHICULAR ACCESS, PARKING AND PLAYING FIELDS
PENYCAE INFANTS SCHOOL COPPERAS HILL PENYCAE WREXHAM**

Thank you for referring the above planning application received at our office 17th June 2016.

We have the following comments for consideration:

Flood Risk

The site is in Zone A as defined by TAN 15 Development & Flood Risk (July 2004) and shown on the Welsh Government's Development Advice Map (DAM). However, the development may increase the surface area of impermeable ground, thus reducing percolation and increasing rapid surface run-off. In accordance with Section 8 of TAN 15, in all zones, development should not increase flood risk elsewhere.

The application form indicates the intention to dispose of surface water using SuDS or soakaway, however, no surface water management plan has been submitted, and the submitted soakaway test results indicate that ground conditions at the site are not suitable for infiltration. There is no obvious watercourse on site, which may mean that the only option for surface water disposal is to the public sewer. Prior to the grant of any planning permission, we recommend you contact your Drainage Department for further advice in relation to this (as they fulfil the role of Lead Local Flood Authority). This will ensure that conditions are not attached to a planning permission which could later prove impossible to implement.

We recommend that a condition is imposed to ensure that a scheme to dispose of surface water is submitted to and approved in writing by your Authority, to ensure effective management of surface water run-off resulting from the proposed development. We request that we are consulted on any details submitted for approval to your Authority to discharge these conditions and on any subsequent amendments/alterations (including any condition related to a surface water management scheme). We will usually limit our comments to reviewing the acceptability of the proposed discharge rate as well as the suitability of the discharge point / receiving watercourse.

Species

The application has been supported by a preliminary ecological survey (Reference: Knight, T. (2016). Re-development of Penycae Infants School, Copperas Hill, Penycae, Wrexham –

Extended Phase 1 Habitat Survey of Adjacent land. Marches Ecology. Reference No. C295/EP1HS. Unpublished.)

I understand that the results of the preliminary ecological survey did not confirm the presence of any European protected species or fully protected British protected species

In my 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. It also appears that it is not likely to adversely affect any local populations of fully protected British protected species.

We would also like to suggest the inclusion of biodiversity enhancements within this development consistent with TAN 5. These could include:

- The provision of either bat boxes or bat bricks in the new build. These should ideally be placed as high as possible on the south side of the building and away from any exterior lighting
- The provision of house martin and or swift boxes under eaves if appropriate
- The retention of mature trees and hedgerow within the development where possible or tree and hedge planting on boundaries.

Land Contamination

A 'Stage 2 Contamination Assessment, January 2015', by Smith Grant Partnership is provided in support of this application. Based on the information available, Natural Resources Wales considers that the controlled waters at this site are not currently of highest environmental sensitivity. Therefore, we will not be providing detailed site-specific advice or comments with regards to land contamination issues for this site.

It is recommended that the requirements of Planning Policy Wales and the Guiding Principles for Land Contamination (GPLC) should be followed.

These comments are based on our assumption that **gross contamination** is not present at this location. If, during development, gross contamination is found to be present at the site the Local Planning Authority may wish to re-consult Natural Resources Wales

Pollution Prevention

We would also draw their attention to the following relevant pollution prevention guidance notes:

- PPG 6: Working at construction and demolition sites
- PPG 4: Treatment and disposal of sewage where no foul sewer is available
- PPG 5: Works and maintenance in or near water

Yn gywir / Yours' faithfully,

Ruth Prichard

Swyddog Cyswllt Cynllunio / Planning Liaison Officer

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Deialu uniongyrchol/Direct dial: (0300) 065 3787 **Siaradwr Cymraeg / Welsh Speaker**



cc: