



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-21891-M3V5
Eich cyf/Your ref: P/2015/0949

Llwyn Brain
Ffordd Penlan
Parc Menai
Bangor, LL57 4DE

Ebost/Email: Gareth.Thomas@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: (0300) 065 3786

Philip Forster
Planning Control Department
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Date: 10th August 2016

Dear Mr Forster,

**RESIDENTIAL DEVELOPMENT (30 NO AFFORDABLE HOUSES) WITH ASSOCIATED
HIGHWAY INFRASTRUCTURE FOLLOWING DEMOLITION OF VACANT INDUSTRIAL UNITS
LAND OFF AND WEST OF PARK ROAD, RHOSYMEDRE, WREXHAM, LL14 3YP**

Thank you for consulting us regarding further information submitted in support of the above application, which we received on the 1st August 2016.

Further to our previous response, dated 22nd January 2016, we withdraw our objection to the application, subject to the recommended conditions as below being included within any permission:

Protected Species

We have no objection to the proposed development based on the findings and recommendations of the ecology reports. We recommend that the mitigation measures within the reports are included as conditions within any permission.

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 therefore advise that any permission 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.

Flood Risk

The submitted drainage layout (J01556/A2/001) indicates surface water will be disposed of to infiltration, up to the 1% AEP plus climate change storm, however it appears that the permeability coefficient used in the calculations is not based on site investigations, which applicant indicates have not yet been carried out. The applicant's cover email to Philip Forster of 29 June 2016 proposes that means of disposal of surface water be investigated as part of a condition. However, with no agreement from the sewerage undertaker to accept surface water flows, no evidence that surface water can be effectively infiltrated on site, and no watercourses on site, we strongly recommend you liaise with your Drainage Department for further advice in relation to this (as they fulfil the role of Lead Local Flood Authority). This will ensure that no condition is imposed which could later prove impossible to implement.

We request that we are consulted on any further details submitted for approval to your Authority.

Land Contamination, Pollution Control and Waste Management

Natural Resources Wales considers that the controlled waters at this site are not 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.

Responsibility for preventing pollution during the works rests with those in control of the site. Please see Pollution Prevention Guidance 6 which covers best practices for preventing pollution at Construction & Demolition sites, link given below. The site should familiarise themselves with this document as this will help prevent pollution:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/290139/pmho0412bwfe-e-e.pdf

If a pollution incident does arise the site must inform us immediately via our incident hotline 0800 80 70 60.

Any waste produced during the demolition/construction should be disposed of as per Waste regulations. It is the producer's responsibilities to ensure that Waste regulations are followed. Please see our website www.naturalresourceswales.gov.uk for Waste disposal Guidance. As mentioned there may material contaminated with asbestos this must be disposed of following duty of care.

We recommend that a Site Waste Management Plan (SWMP) is drawn up prior to scheme's commencement in order to ensure full duty of care is complied with. Waste should be reused on site where possible. The SWMP should incorporate a monitoring system for wastes removed from site for reuse or disposal.

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

Swyddog Cyswilt Cynllunio / Planning Liaison Officer

Ebost/Email: Gareth.Thomas@cyfoethnaturiolcymru.gov.uk

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