

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

Date: 27th June 2016

Dear Sir/Madam,

**OUTLINE APPLICATION FOR RESIDENTIAL DEVELOPMENT (254 DWELLINGS) AND NEW ACCESS
FORMER AIR PRODUUCTS SITE LLANGOLLEN ROAD ACREFIAR WREXHAM**

Thank you for referring the above planning application received at our office 3rd June 2016.

We have the following comments for consideration:

Geotechnical and Geo-Environmental

A thorough Preliminary Risk Assessment (PRA) was carried out for this site by Parsons Brinckerhoff in May 2010 (job no FSE-97292A). The PRA included recommendations for further work. Following on from this, the 'Phase 2 Geotechnical and Geo-environmental site investigation' was carried out and the report dated 19 July 2015 (job no. 38562) by Eastwood and Partners was prepared. While the Phase 2 investigation goes some way to implementing the recommendations in the PRA, it does not address these fully. We see the Phase 2 investigation as being a useful step in the investigation process. It provides useful information, however it also leaves a lot of gaps and raises a lot of questions.

We advise the applicant be asked to justify the spatial extent of the investigation, as some of the site appears not to have been investigated as well as areas of obvious potential for contamination, e.g. the infilled reservoir highlighted in the PRA. Likewise, the basis for the sampling grid and sampling frequency and choice of samples selected for analyses should be explained.

In particular we note the significantly elevated concentrations of Total and Petroleum Hydrocarbons, which include a high concentration of total aromatic hydrocarbons, at TP5. At the concentrations detected these are likely to constitute Hazardous Substances, which should be prevented from entering controlled waters. The proposals include leaving the material in place to break the potential human health link. In the absence of a controlled waters risk assessment could the applicant please demonstrate how leaving the material in place does not create a risk to contamination entering controlled waters.

Flood Risk

The application site lies within Zone A, as defined in TAN 15 Development and Flood Risk (2004) and shown on Welsh Government's Development Advice Map. However, isolated parts of the site

are shown to be at risk of surface water flooding in Natural Resources Wales' Flood Map for Surface Water.

Surface water management

The submitted outline drainage plan ('Outline Drainage Strategy Acrefair (South), Wrexham Air Products Plc, WSP 2011) indicates the applicant's intention to discharge surface water to Tref-y-nant Brook (page1), however, it is important to note that this watercourse is 750m to the south west of the site (paragraph 2.2.4), and that therefore any connection will be via third party land. The drainage plan indicates that there may be an existing drainage system from the site to the Tref-y-nant Brook, however no information has been submitted to confirm that any historic drainage system is still operational, or that it can be adequately maintained for the lifetime of the development. Therefore, 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.

If planning permission were to be granted 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 advise that any proposed scheme should ensure that run-off from the proposed development is reduced or will not exceed existing runoff rates. Details of adoption and management should also be submitted to ensure that the scheme/systems remain effective for the lifetime of the 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.

Ecology

NRW are aware of local populations of Great crested newts located to the north and west.

In NRW's view, fundamentally based on existing information, the proposal is not likely to be detrimental to the maintenance of the favourable conservation status of any populations of European protected species.

Furthermore, the proposal appears unlikely to adversely affect any local populations of fully protected British protected species.

Environmental Management Plan

An Environmental Management plan should include:

Protection of the surface water drains during construction.

Any dewatering of surface water on site should be in accordance with Natural Resources Wales Position Statement if the conditions cannot be met a discharge permit maybe required, any silt should be removed prior to a discharge to surface water.

Any waste contractors employed should hold Waste Carriers Licences and use appropriately Permitted Waste Facilities.

Oils and/or any liquids should be stored on drip trays and in safe areas away from moving machinery and surface water drains.
Spill kits should be kept onsite and all staff should be trained to use them.

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: