

Matthew Phillips
Planning Control Department
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Date: 16th March 2016

Dear Mr Phillips,

**OUTLINE APPLICATION FOR RESIDENTIAL DEVELOPMENT (UP TO 189 DWELLINGS) WITH
ALL MATTERS RESERVED EXCEPT FOR ACCESS
LAND EAST OF TAN Y BONT, MAIN ROAD, RHOSROBIN, LL11 4RL**

Thank you for referring us to the above planning application, which was received on the 29th February 2016.

We request that any approval considers the following points, and includes the following formal conditions:

Flood Risk

The site lies entirely within Zone A as defined by Welsh Government's Development Advice Map (DAM) as referred to under TAN15: Development & Flood Risk. Our Flood Map information confirms that the site lies outside of the extreme flood risk outline (rivers and the sea). The updated flood map for surface water suggests that there are areas of the site that could be subject to surface water flooding. These areas have been highlighted in the Applicant's Flood Consequences Assessment (FCA) (Tier Environmental Limited, T/14/1400/FCA, 12 January 2016). We note that the "indicative site layout plan" shows that there will be no built development in these potential risk areas, and this is to be welcomed. However, should any future development layouts seek to locate development in these areas of potential flood risk, then further consideration of the risks and potential mitigation options, will need to be assessed at that stage.

Management of surface water runoff – Surface Water Management Strategy

The FCA proposes to direct surface water runoff from the developed site using infiltration techniques. The Applicant, and the FCA, have failed to submit supporting data (e.g. results of onsite soakaway tests) to prove that such techniques are viable across the developable areas of the site. As there are no watercourses on, or in vicinity of, the site to dispose of surface water, and since Welsh Water have not provided confirmation that surface water could be directed to the public sewer network, then there is a risk that a viable means of surface water disposal could not be achieved at this site.

Since the management of surface water runoff is a material planning consideration and given the scale of proposed development (potential negative onsite and offsite flood risk impacts) it is our recommendation that this issue be resolved, in conjunction with your drainage department, **PRIOR** to the grant of any planning approvals. We note the comments made by your Senior Flood Risk Management Officer and are supportive of his advice and recommendations.

Foul drainage

Dwr Cymru/Welsh Water should be consulted on the proposals and be requested to confirm that the sewerage and sewage disposal system serving the development has sufficient capacity to accommodate the additional flows generated as a result of the development. This is to ensure that the development does not cause pollution of the water environment or potential deterioration in the Water Framework Directive classification.

Protected Species

We acknowledge receipt of the Ecological Assessment Report Assessment Report dated October 2014 prepared by TEP.

- Bats

Bats are protected under the Wildlife and Countryside act 1981 (as amended), the Countryside and Rights of Way Act 2000 and Schedule 2 of The Conservation of Habitats and Species Regulations 2010 (as amended).

Bats utilise trees with certain features for roosting/resting sites as well as using linear features such as hedgerows and forests for foraging and migrating.

The report identifies that there are several trees on site with the potential to support bats.

It is unclear however if any of these trees are to be felled to accommodate the proposed development.

As recommended in the ecological assessment all mature trees that need to be felled should be checked for features that may be used by bats (i.e. cavities, cracks, holes & ivy cover). Where impacts on bats are considered likely, then those trees should be subject to emergence surveys at an appropriate time of year. Should bats be found to be using the trees as roosting sites then we would expect you to propose and deliver appropriate mitigation and/or compensation schemes, along with Reasonable Avoidance Measures, to ensure the favourable conservation status of the species is maintained.

As advised in the report, any lighting scheme should avoid light spillage onto linear features used by bats. We advise that any permission includes a condition requiring the submission of a lighting scheme prior to the commencement of development to be approved to the satisfaction of the local planning authority.

NRW welcomes the habitat enhancement measures included in the report including the installation of bat and bird boxes.

As recommended in the report, hedges should be retained as far as possible in order to maintain habitat connectivity.

Subject to the above advice being adhered to it is not considered that the development will impact the favourable conservation status of protected species.

- Reptiles

The Ecological Assessment Report identifies that the site generally has low potential to support reptiles and there are limited opportunities within the wider landscape that may allow reptiles to disperse to the site although some areas of suitable habitat exist within areas of transitional scrub vegetation.

As recommended in the report, a precautionary approach with regard to vegetation clearance is recommended. Areas of suitable scrub should be stage-stripped under ecological supervision to ensure no harm comes to any reptiles that may be present.

- Nesting Birds

Nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended).

As recommended in the report any removal of vegetation should be undertaken outside of the nesting bird season (March – August inclusive). If this is not possible a pre-clearance check should be made by an ecologist no more than 24 hours in advance of removal.

- Invasive Species

As identified in the Ecological Assessment Report, the presence of invasive species needs to be confirmed.

This assessment must include, if appropriate:

- (i) 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 development and restoration.

Waste Management

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.

Where a condition has been imposed which has been suggested by Natural Resources Wales or which meets Natural Resources Wales objective the Local Planning Authority should consult with Natural resources Wales to secure compliance with the condition prior to its discharge. A copy of the subsequent decision notice would be appreciated.

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

Swyddog Cyswilt Cynllunio / Planning Liaison Officer

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



cc: Cassidy & Ashton