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Wrexham County Borough Council,
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northplanning@cyfoethnaturiolcymru.gov.uk

02/11/2020

Dear Sir/Madam,

BWRIAD / PROPOSAL: EXTENSION TO BUILDING AND AMENDMENT TO SITE LAYOUT APPROVED BY P/2015/0617 AND CHANGE OF USE TO TRACTOR STORAGE.

LLEOLIAD / LOCATION: WESTFIELD DEPOT, BUCK ROAD, COMMONWOOD, HOLT

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 14/10/2020

We have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if you attach the following condition to the permission. Otherwise, we would object to this planning application.

Summary of Conditions:

Condition 1 (Land contamination): Unsuspected Contamination

Condition 2 (Land contamination): Drainage Scheme

Our detailed advice is as follows:

Contaminated land

The Site is situated on a Principal Aquifer within a Source Protection Zone (SPZ), and with an abstraction borehole approximately 100 m east of the development (NGR SJ37815349), and as such extra caution is required to ensure that:

- a) No existing contamination is present on Site from Site activities (sale and servicing of tractors, fuel and oil storage etc.) and

b) That potential risk of soil and groundwater contamination from either construction activities or subsequent operations are controlled.

Our approach to the protection of groundwater is detailed in the [Environment-Agency-approach-to-groundwater-protection](#), specifically related to SPZs and water supply boreholes in Section B

We would recommend limited soil sampling where soils are exposed as part of the development and where there is visual and other evidence of contamination from fuel and oils. We advise that the below condition should be attached to any planning permission for this scheme:

Condition1 (Unsuspected contamination)

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Justification:

To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to groundwater, and to ensure that the development can be carried out safely without unacceptable risks to either Site occupants or groundwater.

Condition 2 (Drainage Scheme)

No development or phase of development shall commence until a drainage scheme has been submitted to and approved in writing by the LPA. The drainage scheme shall comply with and be carried out in accordance with the approved details.

Justification:

To achieve (b) above and comply with the [Welsh Statutory National Standards for Sustainable Drainage Systems \(SuDS\)](#) a drainage scheme should be submitted to ensure necessary measures are approved prior to commencement of development or phase of development and implemented to prevent the deterioration of controlled waters, in this case groundwater, or surrounding land from flooding or contamination.

The above condition 2 is advised on the basis that no Sustainable Drainage Approval Body (SAB) approval is required. If a SAB approval is required, then it will be for your authority to determine whether the drainage scheme would be more appropriately controlled under the SAB approval.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

Advice for the Developer

During the construction phase you should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages.

For further guidance please refer to GPP 5 and PPG 6 at the following link: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

Environmental Management

All works at the site must be carried out in accordance with PPG6: 'Working at construction and demolition sites' which are available on the following website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

The activity of importing waste into the site for use as, for example hardcore, must be registered with Natural Resources Wales as an exempt/permittable activity under the Environmental Permitting Regulations 2016. The developer should contact Natural Resources Wales to discuss the necessity for an exemption/permit for any material imported to and exported from the site.

If during construction/excavation works any contaminated material is revealed, then the movement of such material either on or off site should be done in consultation with Natural Resources Wales. Any waste excavation material or building waste generated in the course of the development must be disposed of satisfactorily and in accordance with Section 34 of the Environmental Protection Act 1990. Carriers transporting waste from the site must be registered waste carriers and movement of any Hazardous Waste from the site must be accompanied by Hazardous waste consignment notes.

If you have any queries on the above, please do not hesitate to contact us.

Yours faithfully

Rhys Jones

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales