

Wrexham County Borough Council
The Guildhall,
Wrexham
LL11 1AY

28/07/2020

For the attention of Simon Greenland:

Dear Simon,

**PROPOSAL: APPLICATION FOR VARIATION OF CONDITION NO. 3 IMPOSED
UNDER PLANNING PERMISSION P/2003/0579 TO PROVIDE FOR THE
IMPORTATION, PROCESSING AND STORAGE OF ROAD PLANNINGS AND THE
IMPORTATION AND STORAGE OF PRE COATED CHIPPINGS
LOCATION: Borrás Quarry, Wrexham**

Thank you for re-consulting Natural Resources Wales (NRW) about the above, which was received on 21/07/2020.

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

Requirement 1: Provision of a drainage strategy for the site.

Ground Water Protection

We note the letter dated 4th March 2020 from MJCA to Wrexham County Borough Council. Re: Borrás Quarry – proposed importation, processing and storage of road planings – section 73 application.

We note that the applicant will be applying for a Standard Rules Environmental Permit from Natural Resources Wales for the proposed development as detailed within the letter dated 4th March. However, the letter does not explain the site drainage. Within the Standard Rule Permit (we assume SR2008 No.10 v6) the criteria for issuing the permit is to have sealed drainage. Given that the site is located within a Source Protection Zone 3 and on a Principal aquifer, we consider the site to be sensitive with respect to controlled waters. Please provide details on the drainage strategy for the site as site drainage is a material consideration under planning and not dealt with under the permit.

Requirement 1: Provision of a drainage strategy for the site.

European Protected Species License

NRW has issued an extant EPS licence in respect of Borrás Quarry. This includes requirements for surveillance of the entire quarry. We concur with the observations and conclusions in the Technical Note (Wilkinson Associates Environmental Consultants, 13th July 2020). However, we advise that annual/biennial liaison is required in respect of this site.

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 to Developer

Pollution Prevention

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.

Yn gywir / Yours sincerely,

Daniel Davies

Daniel Davies

Uwch Cynghorydd Cynllunio Datblygu / Senior Advisor, Development Planning

Cyfoeth Naturiol Cymru / Natural Resources Wales