

For the attention of Mared Rees

10/01/2019

Dear Mared,

TOWN AND COUNTRY PLANNING ACT 1990
DEDDF CYNLLUNIO GWLAD A THREF 1990

**PROPOSAL:
PROPOSED RESIDENTIAL DEVELOPMENT FOR 44 NO. RESIDENTIAL DWELLINGS
LOCATION:
Land West of Bryn Isa, Vicarage Lane, Gresford, Wrexham**

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 18/12/2018.

We recommend that you should only grant planning permission if you attach the following conditions. These conditions would address significant concerns that we have identified and we would not object provided you attach them to the planning permission.

Summary of Conditions

Condition 1: EPS: External lighting/internal light spillage assessment compliant with the provisions of the Institution of Lighting Professionals and Bat Conservation Trust: Guidance Note 08/18: Bats and Artificial Lighting in the UK

Condition 2: Biosecurity: No development shall take place until a Biosecurity Risk Assessment has been submitted and approved to the satisfaction of the LPA

Protected Species

We note that the bat report submitted in support of the above application (Roe, R. (2018) . Vicarage Road, Gresford: Ecology Report. Kingdom Ecology. Unpublished) has identified that bats were not using the application site. However, in line with the recommendations in the Ecological Report we recommend you include a condition in relation to the lighting scheme for the proposal.

Condition 1: EPS: External lighting/internal light spillage assessment compliant with the provisions of the Institution of Lighting Professionals and Bat Conservation Trust: Guidance Note 08/18: Bats and Artificial Lighting in the UK

Biosecurity

NRW 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 future consent includes the imposition of a condition requiring the submission and implementation of a Biosecurity Risk Assessment to the satisfaction of the LPA.

Condition 2: Biosecurity: No development shall take place until a Biosecurity Risk Assessment has been submitted and approved 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 & Management of Surface Water Runoff

The site lies entirely within Zone A as defined by the Development Advice Map (DAM) referred to within TAN15: Development and Flood Risk. The NRW Flood Risk map confirms that the site lies outside the extreme flood outline (0.1% annual probability event).

We note that a Flood Consequences Assessment (FCA) has been prepared in support of the application by Coopers (Chester) Ltd (6872FCA_RevC), which identifies some discrete areas of surface water flood risk at the site. We therefore recommend that Your Authority seeks advice from its flood risk / drainage department, who act as the Lead Local Flood Authority (LLFA) in respect to this local flood risk.

We also note that the FCA contains a surface water drainage strategy. We recommend that the LLFA is also consulted on the suitability of site drainage proposals, including the suitability of infiltration at the site. We do not provide advice in this regard. The LLFA will be able to comment on the acceptability of the proposals from a local flood risk perspective, and will be able to advise whether the proposed surface water drainage system is acceptable.

The contact details for the LLFA are as follows:

Neil Taunt
Flood and Water Management Resilience Officer
Emergency Planning

Tel: 01978 298827

Email: flooding@wrexham.gov.uk

Please do not hesitate to contact us if you require further information or clarification of any of the above.

Our comments above only relate specifically to matters that are listed in our 'Consultation Topics' document (September 2018) which is published on our website: (<https://cdn.naturalresources.wales/media/686847/dpas-consultation-topics-august-2018-eng.pdf?mode=pad&rnd=131819256840000000>). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance.

Advice to Applicant

Pollution Prevention

The applicant is advised to follow the guidance within the Guidance for Pollution Prevention 6 'working at construction and demolition sites':

<https://www.sepa.org.uk/media/60125/ppg-6-working-at-construction-and-demolition-sites.pdf>

Any work which is to take place should be done so with pollution prevention in mind. Pollution prevention advice and guidance can be found via this link:

<http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

Should any pollution occur during the construction or operational phase, Natural Resources Wales should be notified via the incident hotline – 03000 65 3000.

Waste

Waste produced during the construction phase of your development must be dealt with appropriately and be in line with all relevant waste legislation including Duty of Care Regulations and Hazardous Waste Regulations. As part of your waste duty of care you must classify the waste produced:

- before it is collected, disposed of or recovered
- to identify the controls that apply to the movement of the waste
- to complete waste documents and records
- to identify suitably authorised waste management options
- to prevent harm to people and the environment.

Any waste removed from site will be subject to waste management controls. The links below provided information on how to classify waste and register as a waste carrier or hazardous waste producer:

<http://naturalresources.wales/waste/how-to-classify-and-assess-waste/?lang=en>

<http://naturalresources.wales/apply-for-a-permit/waste/?lang=en>

Further guidance can be found on the GOV website here:

<https://www.gov.uk/managing-your-waste-an-overview/duty-of-care>

Groundwater Quality

We refer the developer to the Environment Agency (2017) 'Approach to groundwater protection' position statements which have been adopted by Natural Resources Wales. In particular the developer should be aware of the advice under Position Statement G13 (Sustainable drainage systems) which applies to this development.

The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.

Yn gywir / Yours sincerely,

Daniel Davies

Daniel Davies

Cynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales