

01/03/2019

FAO Philip Forster

Dear Phil,

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

BWRIAD / PROPOSAL:

**Outline Application For Development Of Site For B1 Light Industrial Units And B2 /
B8 Industrial Unit Including Means Of Access, Scale Of Building And Ecological
Mitigation Zone With Indicative Details Provided In Relation To Appearance, Layout
And Landscaping (Site 5)**

LLEOLIAD / LOCATION:

Land opp Wilkinson Business Park, Clywedog Rd South, Wrexham Ind Est

Thank you for re-consulting Natural Resources Wales (NRW) about the above with additional information, which was received on 25/02/2019.

NRW does not object to the proposal, however we would provide the following advice.

Protected Species

In our view the additional ecological submission (Roe, R. (2019). Land at Clwedog Road South (Site 5b), Wrexham Industrial estate: Further Great Crested Newt Assessment. Kingdom Ecology. Unpublished), satisfactorily addresses previous uncertainty issues in respect of great crested newt.

We advise that any ecological measures proposed as part of the scheme include provisions in respect of GCN.

However, given the importance of WIE for dingy and grizzled skipper butterflies, our advice must flag the need to ensure satisfactory invertebrate surveys and assessments have been carried out to inform the planning decision making process. We advise you speak to your ecologist.

Habitat Management Strategy

We welcome the inclusion of the habitat management Strategy.

We advise that details concerning its implementation are secured via planning condition / Section 106 Agreement. Material provisions of the agreement to include, but not limited to, financial arrangements, management plan and updates, wardening, monitoring and tenure.

Pollution Prevention

Given the proximity to the River Clywedog and subsequently the River Dee, the development should ensure that suitable pollution prevention methods are used to mitigate from any pollution during the construction phase. As there is a drain visible running through the proposed plots, no pollution to water should take place.

Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with GPP5 and PPG6: 'Works in, near or over watercourses' and '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/>

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/>

It is advised that oil interceptors are installed on the surface water drainage for these developments. This will mitigate from any oil discharges which may occur from vehicles parked on site.

It is unclear what the use of these units are at this stage, if any chemicals are stored at these sites they may require a Dee Protection Zone permit from Natural Resources Wales.

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

Site Drainage and Contamination

We note that foul water will be discharge to the existing mains sewer network and surface water to local water courses. From a groundwater perspective we have no further comment on site drainage.

We note the previous uses of the land on the industrial estate (i.e. ordnance factory during the second World War) and that currently the land is unused with maintained grass. The Design and Assessment Statement does mention that a Phase 1 geo-environmental assessment report has been completed, but this has not been included within the application supporting documentation. However, we consider the site to be not of the

highest environmental setting and do not wish to review this report. Therefore, we request the following informative be imposed on any planning permission granted.

Contaminated Land Informative

Natural Resources Wales considers that the controlled waters at this site are not of the highest environmental sensitivity, therefore we will not be providing detailed site-specific advice or comments with regards to land contamination issues for this site.

It is recommended that the requirements of Planning Policy Wales and the Environment Agency Guiding Principles for Land Contamination (GPLC 1, 2, and 3), March 2010, should be followed – NRW have adopted this guidance.

These comments are based on our assumption that gross contamination is not present at this location. If, during development, gross contamination is found to be present at the site the Local Planning Authority may wish to re-consult the Natural Resources Wales.

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

Waste Regulation

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>

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