



Legend

Flood Depth (m)

0.00m
0.05m
0.10m
0.15m
0.20m
0.25m
0.30m
0.35m
0.40m
0.45m
0.50m
Existing Pond High Water Level

**OPUS**

Wrexham Office
+44 1978 368100

Opus House, Yale Business
Village, Wrexham Tech.
Park, Wrexham LL13 7YL

AO	VM	MAW	25.10.17
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V-R6472.06	1:1000 @ A3
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IPSEN BIOPHARM
FLOOD CONSEQUENCES
ASSESSMENT

1% AEP EVENT WITH 30% INLET
BLOCKAGE

V/R6472/06/G	06	A
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AO	VM	MAW	25.10.17
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V-R6472.07	1:1000 @ A3
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IPSEN BIOPHARM
FLOOD CONSEQUENCES
ASSESSMENT

1% AEP EVENT WITH 60% INLET
BLOCKAGE

V/R6472/07/G	07	A
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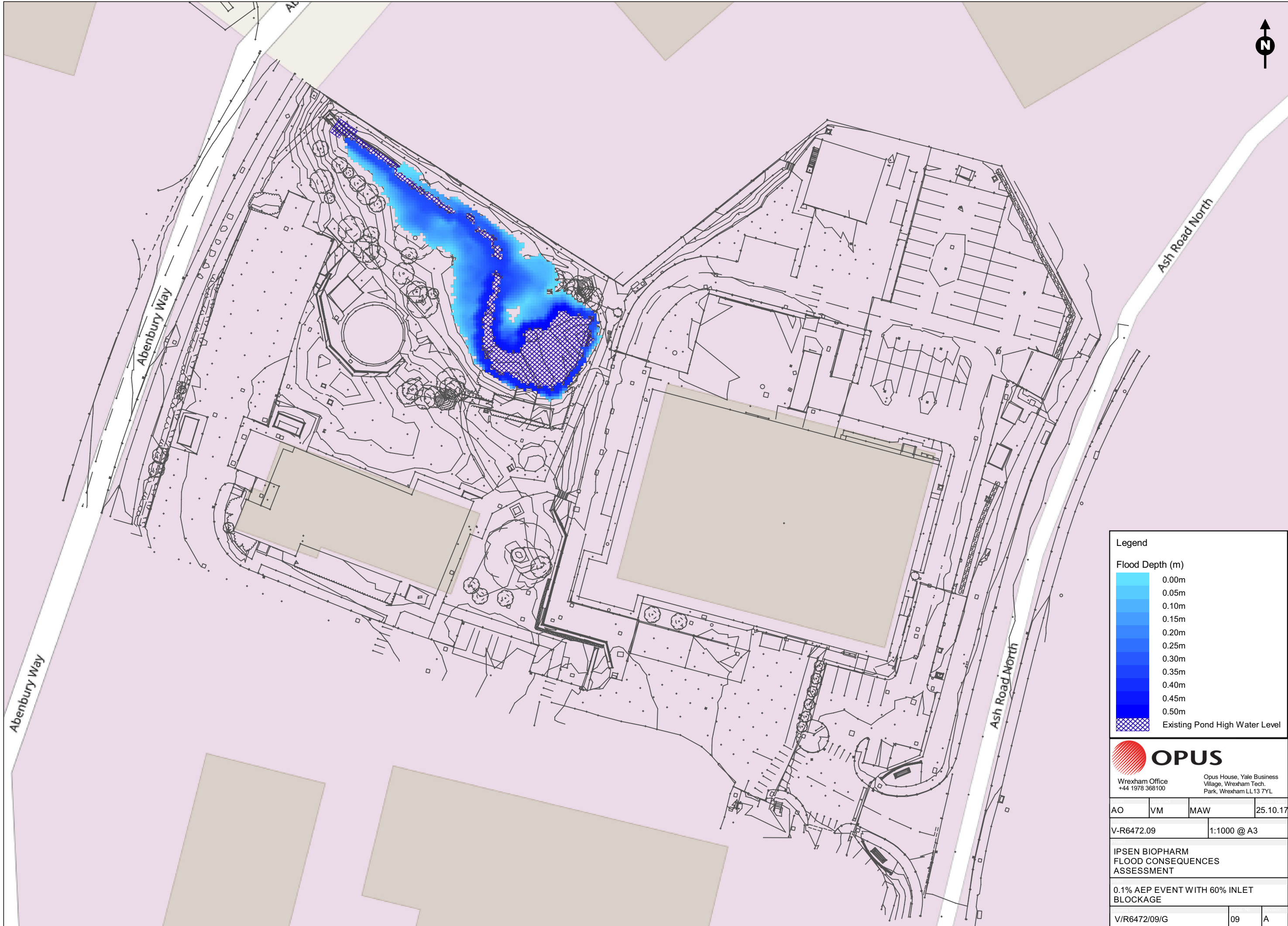
AO	VM	MAW	25.10.17
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V-R6472.08	1:1000 @ A3
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IPSEN BIOPHARM
FLOOD CONSEQUENCES
ASSESSMENT

0.1% AEP EVENT WITH 30% INLET
BLOCKAGE

V/R6472/08/G	08	A
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AO	VM	MAW	25.10.17
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V-R6472.09	1:1000 @ A3
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IPSEN BIOPHARM
FLOOD CONSEQUENCES
ASSESSMENT

0.1% AEP EVENT WITH 60% INLET
BLOCKAGE

V/R6472/09/G	09	A
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Opus House, Yale Business Village,
Wrexham Technology Park,
Wrexham LL13 7YL
United Kingdom

t: +44 1978 368100
f: +44 1978 368101
w: www.opusinternational.co.uk

Registered in England & Wales,
Company Reg. No: 2847568
Reg Office: Willow House, Brotherswood Court
Great Park Road, Bristol, BS32 4QW

Appendix E – Natural Resources Wales

Lovelock Mitchell Architects
3 Stanley Street
CHESTER
CH1 2LS

Er sylw/For the attention of: Ed Mortell

Annwyl/Dear Mr Mortell

**Town and Country Planning (Development Management Procedure) (Wales)
(Amendment) Order 2016 Notice Pre-Application Consultation under Article 2D**

Bwriad/Proposal: New 3 Storey Office building with secondary packing area on the ground floor. Ground floor also contains storage & dispatch areas. The new building will be built on the footprint of the existing Unit 55 that is to be demolished under planning permission P/2017/0305. The rear car-park will be replaced with a new service yard and there will be ancillary landscaping throughout including amendment to existing entrance.

Lleoliad/Location: Ipsen Biopharm, Wrexham Industrial Estate

Thank you for consulting Natural Resources Wales (NRW) about the above proposed development at pre-application stage, which was received on 22 June 2017.

Please note that our comments are without prejudice to any comments we may wish to make when consulted on any subsequent planning application or permit (either at pre-application or application stage) for the proposed development. At that time there may be new information available which we will need to take into account in making a formal response.

Based on the information submitted to us, we have significant concerns with the proposed development as submitted. On this basis, we would recommend to the local authority that they should only grant planning permission if the scheme can meet the following requirement and they attach the conditions summarised below. Otherwise, we would object to the planning application.

Requirement: Submission of a revised Flood Consequence Assessment which includes an assessment of the culverted unnamed watercourse on the site

Condition 1: Geoscience: Universal condition for development on land affected by contamination

Condition 2: Geoscience: Verification Report

Condition 3: Geoscience: Long-term monitoring

Condition 4: Geoscience: Unsuspected contamination

Flood Risk

The site lies entirely in Zone A as defined by Welsh Government's Development Advice Map (DAM) referred to under TAN15: Development and Flood Risk. However, and although we have no exact records, there is likely to be an unnamed watercourse which runs in culvert beneath the site. The potential flood risks associated with this watercourse have not been assessed as part of our Flood Map exercise, as such we would advise that the potential flood risks are unknown and unquantified. In this instance, the existing flood map information (flooding from rivers and the sea) may not be accurately representing flood risk at the site. The updated Flood Map for Surface Water Flooding confirms that portions of the site, particularly within vicinity of the development at Unit 55, could be at risk from surface water flooding.

Requirement: Submission of a revised Flood Consequence Assessment which includes an assessment of the culverted unnamed watercourse on the site

A Flood Consequences Assessment & Outline Surface Water Drainage Strategy (Opus, V-R6472/FRA-DS, May 2017) has been produced. We have reviewed the contents of the report and we have the following observations:

- Section 2.5 acknowledges that a 1.2 metre diameter culvert passes beneath the site. However, it is unclear as to the route, depth and condition of the culverted watercourse. The proposed development, which has a footprint greater than that of the existing building (to be demolished), could impact the culverted watercourse. There should be a demonstration that the development will not affect the integrity of the culvert, and also ensure that sufficient access arrangements are maintained to the structure to ensure that future repair and/or replacement works can be carried out should there be a need in the future. Any works or modifications to the watercourse (including culverted sections) are likely to require the approval of the Lead Local Flood Authority, which in this instance is Wrexham County Borough Council.
- There has been no assessment within the FCA as to the potential flood risks associated with the unnamed watercourse, nor any assessment within

the FCA of how the site, and the development, could be affected by flooding should there be a blockage at the culvert inlet or within the culvert structure itself. This requires assessment within a revised FCA, and mitigation measures may be required to ensure that the development is adequately protected from potential flood risks associated with this watercourse.

Management of Surface Water Runoff

We would recommend that reference is made to Wrexham County Borough Council's "management of surface water generated from new development" guidance. The Council's Flood and Water Management Team (Lead Local Flood Authority) should be consulted at an early stage regarding the development proposals, particularly the intention to discharge via infiltration or to "ordinary" watercourses. (Where the intention is to discharge via infiltration Condition 5 within this correspondence will also apply).

https://www.wrexham.gov.uk/english/planning_portal/publications/surface_water.htm

Geoscience

We have significant concerns with the proposed development due to the site being located within a Source Protection Zone, underlying principal aquifer and Dee Water Protection Zone.

To address these concerns we recommend that the developer should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the Environment Agency's '[Guiding Principles for Land Contamination](#)' for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. Refer to the [Environment Agency's \(2017\) 'Approach to Groundwater Protection'](#)

In the absence of additional information being provided with any future planning application we would recommend to the local authority that they should only grant planning permission for this scheme if the conditions listed below are attached to the planning permission.

Condition 1: Geoscience: Universal condition for development on land affected by contamination

Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:

1. A preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The site investigation results and the detailed risk assessment (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the Local Planning Authority. The scheme shall be implemented as approved.

Condition 2: Geoscience: Verification Report

Prior to commencement of development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a “long-term monitoring and maintenance plan”) for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the Local Planning Authority.

The verification report is required to demonstrate that the remediation criteria relating to controlled waters have been met, and (if necessary) to secure longer-term monitoring of groundwater quality. This will ensure that there are no longer remaining unacceptable risks to controlled waters following remediation of the site.’

Condition 3: Geoscience: Long-term monitoring

Long-term monitoring of the site will ensure that longer term remediation criteria relating to controlled waters have been met and this will ensure that there are no longer remaining unacceptable risks to controlled waters following remediation of the site.

Reports on monitoring, maintenance and any contingency action carried out in accordance with a long-term monitoring and maintenance plan shall be submitted to the Local Planning Authority as set out in that plan. On completion of the monitoring programme a final report demonstrating that all long- term site remediation criteria have been met and documenting the decision to cease monitoring shall be submitted to and approved in writing by the Local Planning Authority.

Condition 4: Geoscience: Unsuspected contamination

Given the size/complexity of the site it is considered possible that there may be unidentified areas of contamination at the site that could pose a risk to controlled waters if they are not remediated.

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 the developer has submitted, and obtained written approval from the Local Planning Authority for, an amendment to the remediation strategy detailing how this unsuspected contamination shall be dealt with.

Condition 5: Surface Water disposal (SUDS)

No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Dee Water Protection Zone

This site lies within the designated Dee Water Protection Zone. The storage or use of controlled substances at the site, due to the nature of the site, may require a formal consent from the NRW, under the Water Resources Act 1991. It is the developer's responsibility to ensure that this matter is discussed with NRW should planning permission be granted.

Further guidance regarding this requirement is available at:

<https://www.gov.uk/government/publications/consent-for-a-controlled-activity-within-the-river-dee-water-protection-zone>

NRW recommends that a comprehensive emergency plan be in place to deal with any potential pollution incident that occurs at the site.

Ecology

The pre-application documentation includes and is supported by an ecological submission (reference: Williamson, K. (2017). Ipsen Biopharm: Ecological and Protected Species Surveys . Cambrian Ecology Ltd. Unpublished.

NRW considers the survey and assessment to have been completed to a satisfactory standard and concur with the conclusions.

Pollution Control

Any construction work should take place following a method statement to reduce the risk of pollution to air land and water. Pollution prevention guidelines should be followed and all waste should be removed from site to a permitted waste facility following the waste duty of care. The applicant should ensure that there are no misconnections to the current surface water and sewage systems already in place.

Should a pollution incident occur on site during construction, this should be self-reported immediately to NRW on our Incident hotline 03000 65 3671.

Our comments above only relate specifically to matters that are included on our checklist "Natural Resources Wales and Planning Consultations" (March 2015) which is published on our website:
(<https://naturalresources.wales/media/5271/150302-natural-resources-wales-and-planning-consultations-final-eng.pdf>).

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. You are advised that, in addition to planning permission, it is your responsibility to ensure that all other permits/consents relevant to your development are secured.

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

Yours sincerely

Meryl Read

MRS MERYL W READ
Technical Specialist

Direct dial 03000 653785 Direct e-mail meryl.read@cyfoethnaturiolcymru.gov.uk

