

Head of Environment and Planning
Wrexham County Borough Council
16 Lord Street
WREXHAM
LL11 1LG

28 March 2017

Er sylw / For the attention of: Matthew Phillips

Annwyl / Dear Mr Phillips

TOWN AND COUNTRY PLANNING ACT 1990
Regulation 13 Town and Country Planning (Environmental Impact Assessment) (Wales)
Regulations 2016

BWRIAD / PROPOSAL: Scoping Opinion for Intensive Poultry Unit

LLEOLIAD / LOCATION: Mulsford Farm Sarn, Malpas Wrexham

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 3 March 2017.

We have reviewed the Scoping Report prepared by Roger Parry and Partners on behalf of D J Huxley Farms (Planning application for an Intensive Poultry Installation at: Mulsford Farm, Mulsford, Sarn, Malpas SY14 7LP, February 2017).

Flood Risk

Chapter 5.7 *Proposed Assessment Techniques -Water Resources* (p25)

Contrary to the statement within this Chapter, the site lies partially in Zone C2 as defined by Welsh Government's Development Advice Map (DAM) referred to under TAN15: Development & Flood Risk. Our Flood Map information confirms that the site lies partially within the extreme flood risk outline. Any new development proposals located within the identified flood risk area will need to be supported by and informed by the results of a Flood Consequences Assessment. The overarching aim of TAN15 is to steer development away from potential flood risk areas, so it would be beneficial for the proposed development layout to reflect this.

Management of surface water runoff

The scale of the proposed development has the potential to increase flood risks both on and offsite if surface water is not effectively managed. We would recommend that the

Applicant refers to Wrexham County Council's "Management of Surface Water Generated from New Development" guide, which details the surface water drainage information that is likely to be required as part of the EIA, or any future planning application(s).

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

Wych Brook – Flood Risk Activity Permit

A Flood Risk Activity Permit may be required from Natural Resources Wales for any structures (or works) located in, under, over or within 8 metres of the bank top of Wych Brook, designated "main river". Further information and guidance is available on our website at:

<http://www.naturalresources.wales/apply-for-a-permit/flood-risk-activities>

Surface Water and Groundwater quality

Chapter 4 Environmental Impacts Chapter 5.7 *Proposed Assessment Techniques -Water Resources*

The site lies within a Nitrate Vulnerable Zone (NVZ) and would therefore have to comply with the NVZ action programme measures and record keeping requirements. This should be acknowledged within the EIA, or any future planning application.

The site also lies within a Principal Aquifer. There are some areas of the scoping report which will need careful consideration, such as the risk to the Principal Aquifer before, during and after active operation of the plant, as well as in emergency/nonstandard situations.

Water Resources

It is noted from the documentation submitted, that a borehole is proposed. Should it be intended to abstract more than 20cubic metres of water per day, then a licence for the abstraction will be required from Natural Resources Wales. Further information and guidance is available on our website at:

<http://www.naturalresources.wales/apply-for-a-permit/water-abstraction-licences-and-impoundment-licences?lang=en>

Air Quality

Chapter 5.10 *Air and Climate Ammonia emissions – Screening Tool (p27)*

The proposed development is above the threshold for environmental permit from NRW. As such, the majority of the air emission issues can be dealt with as part of a permit application.

With respect to the EIA, the use of the Simple Calculation of Ammonia Impact (SCAIL) screening tool is acceptable to determine whether the ammonia and nitrogen from the proposal are likely to damage the sensitive features of the designated sites.

However, if the SCAIL tool indicates that the ammonia and nitrogen are potentially significant and exceed the significance threshold applied for an environmental permit, this will warrant further detailed modelling using the criteria for permitted farm assessments. The applicant/developer should contact NRW to ascertain exactly what would be required in such a detailed assessment. The information can then be used to inform the EIA.

Please do not hesitate to contact me if you require clarification on the above.

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/planning-and-development/planning-and-development/?lang=en>). 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. 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

Meryl Read

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