

Philip Forster
Planning Officer
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Guildhall
Wrexham
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Date: 10th August 2017

Dear Mr Forster,

**CONSTRUCTION OF NEW SLURRY LAGOON AND SAND STORAGE SHED
HANMER HALL FARM, HANMER HALL LANE, HANMER, WHITCHURCH, SY13 3EG**

Thank you for consulting us on the above application, which we received on the 31st July 2017.

We have no objection to the application, but have the following comments:

Groundwater Protection

Under the terms of the Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) Regulations 2010 (SSAFO), any new, substantially enlarged or substantially reconstructed installations, for the storage of silage, slurry and agricultural fuel oil must meet the requirements of the Regulations. Slurry stores must be constructed in accordance with BS5502: part 50 (1993) with reference to the CIRIA Report Document 126 entitled "Farm waste storage: Guidelines for construction". http://www.ciria.org/Resources/Free_publications/farm_waste_storage_intro.aspx Slurry/silage liquor must be stored within a sealed system in accordance with the MAFF "Code of Good Agricultural Practice for the Protection of Water".

In order to be suitable for use to line a lagoon, the imported clay will have to be tested to show its suitability as a liner. The methods for testing and the criteria are specified in section 9.4.2 (detailed assessment of soil suitability) of the Farm Waste Storage guidelines for construction (CIRIA report). The criteria include natural moisture content, liquid and plastic limits, particle size distribution, compaction characteristics and permeability. It will also have to be shown that the clay to be used is homogenous in these characteristics (within reasonable limits) and therefore has suitable permeability limits over the whole of the area. The results of these tests will have to be submitted to NRW to prove compliance with the SSAFO regulations.

The water table should be below the base of the earth bank slurry lagoon to protect controlled waters and to facilitate ease of construction. Water levels should be measured during the wettest time of the year.

For their own benefit, we suggest that the applicants commission a Construction Quality Assurance (CQA) Plan prepared by an independent CQA engineer (CQAE) familiar with geotechnical slope stability design and flexible membrane liners. On completion of the works a CQA Verification Report should be provided to the applicant demonstrating successful completion of the works as

set out in the approved CQA Plan. This will assist applicants in demonstrating compliance with the SSAFO Regulations.

Further information on the SSAFO regulations is available here:

<https://www.gov.uk/guidance/storing-silage-slurry-and-agricultural-fuel-oil>

Natural Resources Wales must be informed of a new, reconstructed or enlarged slurry store or silage clamp at least 14 days before the structure is brought into use:

<http://naturalresourceswales.gov.uk/media/678331/nrw-wqe3.pdf>

Protected Species

You may wish to consult your ecologist to determine whether a protected species survey may be required in support of the application. Where such a survey is requested, and subsequently received, please reconsult us.

Environmental Management

During the construction phase pollution prevention measures should be adopted to ensure no polluting discharges could enter surface water drains and watercourses. Oils and chemicals should be stored within bunded areas and spill kits should be readily available for use in case of accidental spillages.

Any movement of waste must be undertaken in compliance with the Waste Duty of Care legislation.

If inert waste material is to be imported to site for use of construction, the relevant exemption (U1) must be registered with Natural Resources Wales, provided that the exemption criteria are met.

Should any contaminated soil be discovered during excavation, this must be removed and disposed offsite as hazardous waste, and its movement must be accompanied by hazardous waste consignment notes.

Relevant guidance for Pollution Prevention can be found at:

- PGG6 Working at construction and demolition sites (Please note this is an EA only guidance, however the principles are applicable in Wales)
<https://www.sepa.org.uk/media/60125/ppg-6-working-at-construction-and-demolition-sites.pdf>
- PPG 26 Safe Storage: drums and intermediate bulk containers (Please note this is an EA only guidance, however the principles are applicable in Wales)
<https://www.sepa.org.uk/media/60190/ppg-26-safe-storage-drums-and-intermediate-bulk-containers.pdf>
- GPP22 Dealing with spills <https://www.sepa.org.uk/media/60177/ppg-22-incident-response-dealing-with-spills.pdf>
- For advice on Waste duty of care applicable to construction and demolition please visit:
http://www.flytippingactionwales.org/files/2614/0120/3448/FtAW_Construction_Demolition_Bilingual.pdf

· For advice on U1 exemptions please visit: <https://www.gov.uk/guidance/waste-exemptions-using-waste>

Our comments 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.

We advise that in addition to planning permission, it is the applicant's responsibility to ensure that they secure all other permits/consents relevant to their development.

If you have any queries concerning the above, please contact me on the details below.

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

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