

Philip Forster  
Planning Control Department  
Wrexham County Borough Council  
16 Lord Street  
Wrexham  
LL11 1LG

Date: 25<sup>th</sup> May 2017

Dear Mr Forster,

**MIXED USE HYBRID DEVELOPMENT COMPRISING A RESIDENTIAL DEVELOPMENT OF UP TO 51 UNITS (OUTLINE), A 4,000SQ FT RETAIL UNIT (OUTLINE), A BOXING CLUB (OUTLINE), A CAR PARK (FULL), DETAILS OF ACCESS (ALL MATTERS RESERVED) AND ASSOCIATED WORKS  
BRITISH LEGION SOCIAL CLUB, WATS DYKE, LLAY, LL12 0RL**

Thank you for consulting us on the above application, which we received on the 2<sup>nd</sup> May 2017.

Based on the information submitted to us, we would recommend that you should only grant planning permission if the conditions listed below are attached to the planning permission. These would address the significant concerns identified and therefore we would not object:

*Condition – Before commencement, the applicant will submit a Construction Environmental Management Plan (CEMP) to the satisfaction of the LPA, in consultation with NRW.*

**Environmental Management**

NRW would require suitable pollution prevention and waste management measures to be agreed with the Local Planning Authority, in consultation with NRW, to minimise any impacts from the developments on the terrestrial and aquatic environment. This would ensure that any possible risk from the development on the nearby Llay Bog SSSI is minimised. We therefore require that the following condition be included within any permission:

*Condition – Before commencement, the applicant will submit a Construction Environmental Management Plan (CEMP) to the satisfaction of the LPA, in consultation with NRW.*

The applicants must minimise discolouration to the watercourse from the construction works. Silty water should be treated, either through the use of settlement lagoons, or tanks, or discharged across a grassed area. For work in river channels the use of coffer dams is recommended, to keep river water out of the working area. River crossings must be kept free from mud or dust deposits. Oil and chemical storage must be kept away from the watercourse, on an impervious base, within a bund, and secured. Absorbents or a suitable spill kit must be kept on site for use in the event of an emergency. NRW should be notified immediately of such an occurrence. The mixing, use and

washing of machinery and shuttering of wet concrete and cement must be carefully controlled to minimise the risk of any material entering the watercourse. The applicant is advised to follow the guidance within Guidance for Pollution Prevention 5 "Works and maintenance in or near water", available at:

<http://www.netregs.org.uk/media/1304/gpp-5-works-and-maintenance-in-or-near-water.pdf>

Any facilities for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls.

Any waste excavation material or building waste generated in the course of the development must be disposed of satisfactorily in accordance with duty of care requirements under section 34 of the Environmental Protection Act 1990. The waste shall be transported using registered waste carriers to suitably permitted or exempt sites. Transfer notes shall be kept for each load for a minimum of 2 years.

In the event of contaminated land / or hazardous waste detection, the material should be removed as hazardous waste, in accordance with section 34 of the Environmental Protection Act 1990.

We recommend that a Site Waste Management Plan (SWMP) is drawn up prior to scheme's commencement in order to ensure full duty of care is complied with. Waste should be reused on site where possible. The SWMP should incorporate a monitoring system for wastes removed from site for reuse or disposal.

### **Protected Species**

The application is supported by an ecological submission (reference Ross, D. (2016). Preliminary Ecological appraisal: RBL Club, Watts Dyke, Llay. Brooks Ecological. Unpublished.

The results of the survey and assessment did not confirm or suggest the presence of European protected species or fully protected British protected species.

In our view, the ecological submission is proportionate and therefore satisfactory. We advise that the report's recommendations are adhered to, particularly regarding the proposed lighting scheme.

### **Flood Risk**

The application site lies entirely in Zone A as defined by Welsh Government's Development Advice Map (DAM) referred to within TAN15: Development & Flood Risk. Our Flood Map information confirms that the site lies outside of the extreme flood risk outline.

We note that your Authority's Flood Management Officer comments relating to the management of surface water runoff from the proposed development. We are supportive of the comments and the advice given, and Natural Resources Wales has no further flood risk comments to make on this application. We consider that the Lead Local Flood Authority, in this instance, are best placed to provide advice and guidance on the matters relating to the management of surface water generated by the proposed development.

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. Any site owner/developer 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.

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**

**Cynghorydd Cynllunio Datblygiad / Development Planning Adviser**

Ebost/Email: [NorthPlanning@cyfoethnaturiolcymru.gov.uk](mailto:NorthPlanning@cyfoethnaturiolcymru.gov.uk)

Deialu uniongyrchol/Direct dial: (0300) 065 3786 **Siaradwr Cymraeg / Welsh Speaker** 

cc: Knight Frank LLP [emily.roberts@knightfrank.com](mailto:emily.roberts@knightfrank.com)