

The Head of Community, Well-being and Development
Wrexham County Borough Council
Lord Street
Wrexham
LL11 1LG
For the attention of Mr P Forster

Our ref: MMB.2187.22.HJ.CC.A0

Date: 4th November 2016

By E-mail Only

Dear Sir,

Planning Application Ref: P/2016/0709
Construction of Advanced Anaerobic Digestion Plant.
Five Fords Wastewater Treatment Works, Wrexham.

We refer to the planning application that we have submitted on behalf of Dwr Cymru Welsh Water (DCWW) for the change of use of the former construction compound site and the construction of an Advanced Anaerobic Digestion (AAD) Plant, together with associated internal site access roads and screening bund at Five Fords Wastewater Treatment Works, Wrexham (Ref: P/2016/0709).

Mott MacDonald Bentley (MMB), DCWW's appointed engineering and environmental consultants have now had the opportunity to review the consultation responses that you have received from Natural Resources Wales (8th September 2016) and from the Council's Senior Flood Management Officer (5th August 2016). We would respond to the matters raised, as follows:

Natural Resources Wales
Great Crested Newt (GCN)

Following the preparation of the submitted Great Crested Newt Survey report (doc ref: 4791-S-201-MMB-06-XX-RP-NX-19039 – P02) a re-assessment of the works compound area was undertaken when the compound area was cleared. The clearance works were undertaken in accordance with a low a Low Risk Method Statement (doc ref: 4791-S-201-MMB-06-XX-RP-NX-19028), March 2016, (copy attached), as confirmed by the attached Memorandum, dated 1 July 2016 (Ref: 36660NMN26).



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These clearance works were outside of the 250m buffer from the closest GCN breeding pond (approx 360m) and 260m from the closest pond where no GCNs were present. The works were within bare ground considered unsuitable to support GCN and outside of the 250m GCN breeding pond buffer, and as such it was not considered necessary to consult with NRW for these works.

During the GCN low risk ecology check, it was considered that the greater works area was unsuitable to support foraging GCNs. The compound area was comprised of bare-ground that had been cleared as part of the solar panel installation, historically used for growing arable crops. As such, the site is no longer considered to offer potential foraging, dispersal or sheltering habitat for GCN's from the original site walkover undertaken in 2014. The works area is located approximately 250m away from the closest breeding pond and approximately 160m from the closest pond where no GCN's were present.

Invasive Species

No invasive species have been recorded within the construction area for the proposed Thermal Hydrolysis plant, however MMB are aware that invasive plants have been recorded in the wider area. In particular, the Five Fords access improvement works has confirmed the presence of Himalayan Balsam along the Afon Clywedog in the vicinity of the bridge and access road to site. As a precautionary approach, an Invasive Plants Method Statement (doc ref: 4791-S-201-MMB-06-XX-RP-NX-19127), October 2016) has been prepared (copy attached) and the works will follow the submitted Method Statement if any invasive species are found on site during the course of the development.

Air Quality

A MWth figure has not been calculated to date and will require collaboration with the boiler supplier once selected.

Environmental Permitting

DCWW and MMB are aware engagement is required with NRW regarding permitting and this will be completed sufficiently prior to works starting.

Ground Water

The only structures that will be below ground and, therefore, below the ground water table will be structures associated with drainage, such as manholes and pumping stations. These structures will be part of a sealed system and, in view of their limited scale, are likely to have a negligible impact only on ground water flow.

The proposed below ground structures will be designed adequately against failure from internal and external forces. Based on an assessment of the size, number and complexity of the below ground structures, MMB do not consider that a ground water risk assessment is necessary.

Wrexham CBC Senior Flood Management Officer

Surface Water

Due to the nature of the proposed works and the potential risk of pollution by sewage sludge, the proposed surface water drainage has to be a sealed system that is returned to the wastewater treatment works for treatment before discharging to the River Dee. Whilst we understand the Flood Officer's concerns, this extra surface run off will not increase the discharge to above the flow consent agreed with NRW and, therefore, is considered to pose no issue to the receiving water course.

We trust that the above comments and additional documentation will satisfy the concerns of both NRW and the Council's Senior Flood Management Officer and will enable the Local Planning Authority to grant planning permission for the proposed development.

If you wish to discuss these matters further, or require any additional information, please do not hesitate to contact us.

Yours faithfully,



Howard Jones. DipTP, MRTPI
Director of Planning
On behalf of Caulmert Ltd