

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

Date: 21st August 2015

Dear Mr Forster,

**FORMATION OF A REPLACEMENT VEHICULAR ACCESS ON TO CEFN ROAD,
IMPROVEMENT OF EXISTING SITE ACCESS TO FIVE FORDS WASTE WATER TREATMENT
WORKS AND CONSTRUCTION OF REPLACEMENT BRIDGE AND REMOVAL OF EXISTING
BRIDGE DECK
LAND TO THE NORTH EAST OF FIVE FORDS WASTE WATER TREATMENT WORKS, CEFN
ROAD, ABENBURY, WREXHAM**

Thank you for referring the above application, which was received on 29th July 2015.

We request further information on flood risk, as detailed below:

Flood Risk

We have reviewed the submitted Flood Consequences Assessment (FCA). We note that while the FCA addresses the likely impact on flood risk to the nearest residential property 100m upstream, it does not consider the flood risks to property downstream.

Paragraph 3.2.2 of the FCA states 'it is considered unlikely that the existing crossing provides a significant attenuation of flood flows and therefore the alteration of the crossing is very unlikely to have a significant effect on downstream flood risk'. However, the proposed new bridge has a bigger cross-sectional area than the existing bridge (10.2m² compared to 9.4m²). The relatively crude hydraulic model shows 'a small (up to 0.1m) decrease in upstream water levels in comparison to the existing development... due to the increase in the bridge opening area, and hence increased conveyance' (paragraph 4.1.1). By inference, if the new bridge allows more flow to be taken forward, the existing bridge must be providing some backwater effect.

The FCA states that the development will result in some increases in road level, which 'is offset by the lowering of the ground at other sections of the road and a marginal increase in the bridge opening'. Examination of the submitted long section confirms that within the region of the road which lies within Flood Zones 2 and 3 (0.1% AEP and 1% AEP outlines respectively), there will be a general increase in road levels north of the river, but a (slightly lesser) general decrease in road levels south of the river. However, the increase in road level would only start to offset the effect of a larger bridge opening once flows were high enough to interact at that level. Figure 3 of the FCA

shows that the differences in flow between the two bridges are seen at flows between 20m³/s and approximately 45m³/s, presumably as the water level interacts with the bridge decks. It is not clear what effect the new bridge would have on flood risk downstream both below the design flow (examination of the CEH flow data for this location shows that the present-day 1% AEP flow is approximately 38m³/s) and up to the 0.1% AEP flow.

As we are aware that there is a known flooding problem approximately 500m downstream at Five Fords, we would ask the developer to provide further information on the impacts further downstream.

Ecology

The site has been subject to ecological assessment in respect of statutory protected species. We consider that this assessment to be satisfactory for the purposes of informing the public decision making process.

We consider that the proposal is not likely to be detrimental to the maintenance of the favourable conservation status of any populations of bats, great crested newts, otters, water voles, and badgers, which may have been potentially affected by the proposals. Further advice and guidance in respect of birds and reptiles should be obtained from your ecological advisors.

It is suggested for the applicants/contractors, to have a supervising ecologist on site, or on call.

Please note that we have not considered possible effects on all local or regional interests, including those relating to the upkeep, management and creation of habitat for wild birds. Therefore, you should not rule out the possibility of adverse effects on such interests, which would be relevant to your Authority's general duty to have regard to conserving biodiversity, as set out in section 40 of the Natural Environment and Rural Communities (NERC) Act (2006). This advice includes any consideration of the planned provision of "linear" and "stepping stone" habitats.

To comply with your Authority's duty under section 40 of the NERC Act, to have regard to conserving biodiversity, your decision should take account of possible adverse effects on such interests. We recommend that you seek further advice from your authority's internal ecological adviser and/or third sector nature conservation organisations such as the local wildlife trust, RSPB, etc. The Wales Biodiversity Partnership's web site has guidance for assessing proposals that have implications for section 42 habitats and species (www.biodiversitywales.org.uk).

Biosecurity

We consider biosecurity to be a material consideration owing to the nature and location of the proposal. In this case, biosecurity issues concern invasive non-native species (INNS) and diseases. We therefore advise that any consent includes the imposition of a condition requiring the submission and implementation of a Biosecurity Risk Assessment to the satisfaction of the LPA.

We consider that this assessment must include:

- (i) appropriate measures to control any INNS on site; and
- (ii) measures or actions that aim to prevent INNS being introduced to the site for the duration of development and restoration.

Pollution Prevention and Waste Management

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 Pollution Prevention Guidance Note 5 "Works and maintenance in or near water".

The applicants should follow procedures set out in the silt management plan. If any pollution occurs, must stop, and the applicants notify NRW on the 24 hour hotline (0800 80 70 60).

The importing of inert waste onto the site for storage or use in construction, maintenance or improvement works, for example hardcore, soils, must be registered with Natural Resources Wales under The Environmental Permitting (England and Wales) Regulations 2007 and comply with the conditions of the relevant permit. It should be noted that the registration of some exempt activities for the use of waste material for relevant works require a 25 working day consultation period. This is to allow assessment, determination and authorisation prior to commencement of any activity authorised under the relevant permit from The Environmental Permitting (England and Wales) Regulations 2007.

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.

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

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



cc: Caulmert Ltd.