

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

Date: 5th November 2015

Dear Mr Forster,

**ERECTION OF NEW TWO-STOREY PRIMARY SCHOOL, 2.4M HIGH PERIMETER FENCING
AND CONSTRUCTION OF NEW STAFF CAR PARKING
HAFOD Y WERN CP SCHOOL, DEVA WAY, WREXHAM, LL13 9HD**

Thank you for referring the additional information to the above application, which was received on 19th October 2015.

We have no objection to the application, but request that any approval includes the following formal condition:

Surface Water Drainage

The applicant has not provided an explanation for the decision not to manage surface water drainage using SuDS techniques. However, we welcome the confirmation that remedial works will be carried out on the existing culverted surface water drainage network from the site to the River Gwenfro.

The drainage drawings indicate that surface water will be discharged into the culverted system at a rate limited to 70 l/s, which represents a slight betterment from the indicated peak rate previously draining to the system from the impermeable areas of the site, of 70.23l/s. However, given that there is evidence that the location of the new school building has experienced surface water flooding in the past, it may be advisable to require the applicant to provide evidence showing that the repaired system and associated attenuation storage will have sufficient capacity that no flooding will be expected in that location on the site.

We would also recommend that the applicant indicate what provision has been made to ensure that the system will be maintained for the lifetime of the development. You may also wish to consult your Drainage Department for further advice in relation to this, as they fulfil the role of Lead Local Flood Authority.

Land Contamination

We have reviewed the following reports:

1. Geological and Geotechnical Investigation Report, e-geo, July 2013, Report no. EO553.GGI.R1
2. Geological and Geotechnical Investigation Report, Dec 2013, e-Geo, Report no. EO553.GGI.R1.V2
3. Contaminated land investigation and risk assessment of Hafod Y Wern, Wrexham (the former Dunks landfill), ESI, Report reference 61041R2, September 2013.

The e-geo reports are mainly geotechnical reports. The ESI report concentrates on human health linkages and looks only briefly at potential controlled water links. For example, no leachability samples and/or groundwater samples are taken and/or analysed. Therefore, the conceptual site model is not fully developed for the site.

Nevertheless, on the basis that no significant source of contamination was found in the unsaturated zone and given that the River Gwenfro is over 300m from the site, then based on the information available to date, we feel that at present the controlled waters at the site are not of highest vulnerability.

It is thought that some of the material from the adjacent landfill may encroach onto the southern boundary of the application site. However, from our understanding of the proposals, none of the proposed buildings should extend onto this area. Therefore, while piling is proposed for the foundations then these should not be through landfilled areas. If this is not the case and piling is in fact proposed through landfilled waste then we would ask to be reconsulted.

We would therefore advise that the following condition be maintained as follows, in case areas of unsuspected contamination are found:

Condition: If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted, and obtained written approval from the local planning authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved.

Reason: Given the size/complexity of the site it is considered possible that there may be unidentified areas of contamination at the site that could pose a risk to controlled waters if they are not remediated.

Protected Species

We consider the proposal is not likely to be detrimental to the maintenance of the favourable conservation status of any local populations of European or British protected species.

Where a condition has been imposed which has been suggested by NRW or which meets NRW's objective, the Local Planning Authority should consult with NRW to secure compliance with the condition prior to its discharge. A copy of the subsequent decision notice would be appreciated.

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

Swyddog Cyswilt Cynllunio / Planning Liaison Officer

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