



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-11168-S1D9
Eich cyf/Your ref: P/2015/0705

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

Date: 16th October 2015

Dear Mr Foster,

**ERECTION OF NEW COMMUNITY PRIMARY SCHOOL INCLUDING DEMOLITION OF
EXISTING COMMUNITY PRIMARY SCHOOL
GWENFRO C P SCHOOL, QUEENSWAY, WREXHAM, LL13 8UW**

Thank you for consulting us on the above planning application, which we received on the 28th September 2015.

We have no objection to the application, but recommend a condition is included within any permission, as follows:

Flood Risk

The majority of the site (including the location of the proposed replacement school) is located in Zone A as defined by Welsh Government's Development Advice Map (DAM) referred to under TAN15: Development & Flood Risk. Parts of the school playing field are located in Zone B of the DAM. Our Flood Map information shows the site to fall outside of the extreme fluvial (river) flood risk outline.

We have reviewed the Flood Consequences Assessment (FCA) (Caulmert Limited, GPS-CAU-XX-XX-RP-C-00001, September 2015) and can confirm that we have no flood risk objections to the development proposals. The FCA acknowledges that the development has the potential to increase flood risk on-site and off-site if surface water runoff is not effectively managed.

Therefore, Natural Resources Wales recommends that a condition is imposed on any planning approval to ensure that a scheme to dispose of surface water is submitted to and approved in writing by your Authority. This is required to ensure effective management of surface water run-off resulting from the proposed development. As they fulfil the role of Lead Local Flood Authority, we recommend that you contact your Drainage Department for further advice in relation to this. We advise that any proposed scheme should ensure that run-off from the proposed development is reduced or will not exceed existing runoff rates. Details of adoption and management should also be submitted to ensure that the scheme/systems remain effective for the lifetime of the development.

We request that we are consulted on any details submitted for approval to your Authority to discharge these conditions and on any subsequent amendments/alterations (including any condition related to a surface water management scheme). We will usually limit our comments to reviewing the acceptability of the proposed discharge rate as well as the suitability of the discharge point / receiving watercourse.

Waste

Any waste produced during the demolition/construction is disposed of as per Waste regulations. It is the producer's responsibilities to ensure that Waste regulations are followed that includes registering as a waste carrier, registering exemptions or acquiring an Environmental Permit if required. Please see our website www.naturalresourceswales.gov.uk for Waste disposal Guidance.

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 site has been subject to survey and assessment in respect of bats. (Reference Clark, E. (2015). Gwenfro Community Primary School: Bat Survey Report. Atmos Consulting. Unpublished Report: 26601/R2/Rev1).

We consider this submission to be satisfactory for the purposes of informing the public decision-making process, and agree with the conclusions

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

We welcome the thorough approach taken in the bat survey and report, with suggestions for enhancement for bat species consistent with TAN 5; that is, provision of bat boxes away from light sources. We would suggest that larger robust woodcrete boxes be used (these last longer) set at height so as to avoid predation by cats etc. The local Bat Group may be able to assist with siting, annual inspection and cleaning. These are best set facing south in full sun if possible. If bat or evidence of bats are found during demolition or tree works work must cease (bats and bat roosts have legal protection) and NRW be contacted immediately.

Any exterior lighting should be away from the river corridor (to avoid disturbance of otters, bats etc.) and ideally either minimised and/ or motion activated). During works the river corridor should be protected from direct disturbance and overnight lighting (to protect otters, salmonid fish etc.).

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

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cc: DartonB3 Architecture