

Janet Sutherberry
Planning Control Department
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Date: 18th December 2015

Dear Ms Sutherberry,

**RESIDENTIAL (SOCIAL HOUSING) DEVELOPMENT (11 DWELLINGS - 1 NO BUNGALOW, 1 NO BLOCK OF 4 APARTMENTS, 3 NO PAIRS OF SEMI DETACHED HOUSES)
WREXHAM COUNTY BOROUGH COUNCIL CAR PARK AND ADJOINING LAND, BONC WEN,
RHOSLLANNERCHRUGOG, LL14 2EE**

Thank you for consulting us on the above application, which we received on the 4th December 2015.

We request that any approval includes the following formal condition:

The site is in Zone A as defined in TAN 15 Development & Flood Risk (2004) and shown on Welsh Government's Development Advice Map. However, parts of the site are shown to be at risk of surface water flooding in the 3.33% AEP (1 in 30 annual chance), 1% AEP (1 in 100 annual chance) and 0.1% AEP (1 in 1000 annual chance) rainfall events.

The 'Geotechnical Design Report' Datrys, November 2015, states that 'the ground is considered to be unsuitable for the use of soakaways' and recommends that surface water is discharged into 'any nearby watercourses or into the public sewer subject agreement with DCWW'. However, the 'Desk Study & Site Walkover Report (Datrys, September 2014) states 'there are no watercourses near the site'. While we welcome the intention stated in the Design & Access Statement (TACP Architects Ltd, November 2015) to 'follow the principles of SuDS' and attenuate surface water prior to discharge into the existing combined sewer, no information has been provided to indicate that this will be acceptable to DCWW.

Prior to the grant of any planning permission, we recommend you contact your Drainage Department for further advice in relation to this (as they fulfil the role of Lead Local Flood Authority). This will ensure that conditions are not attached to a planning permission which could later prove impossible to implement.

We recommend that a **condition** is imposed to ensure that a scheme to dispose of surface water is submitted to and approved in writing by your Authority, to ensure effective management of surface water run-off resulting from the proposed development. 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.

We consider that the controlled waters at this site are not of the highest environmental sensitivity, therefore we will not be providing detailed site-specific advice or comments with regards to land contamination issues for this site.

It is recommended that the requirements of Planning Policy Wales and the Guiding Principles for Land Contamination (GPLC) should be followed.

These comments are based on our assumption that gross contamination is not present at this location. If, during development, gross contamination is found to be present at the site the Local Planning Authority may wish to re-consult Natural Resources Wales.

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.

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.

Please note that we have not considered possible effects on all species and habitats (including nesting birds) listed in section 42 of the Natural Environment and Rural Communities (NERC) Act 2006, or on the Local Biodiversity Action Plan or other local natural heritage interests. 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 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).

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

Swyddog Cyswilt Cynllunio / Planning Liaison Officer

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

cc: TACP Architects Ltd.