



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: 2578
Eich cyf/Your ref: P/2015/0533

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Kevin Hughes
Planning Control Department
Wrexham County Borough Council
16 Lord Street
Wrexham
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Date: 13th August 2015

Dear Mr Hughes,

**DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF FOODSTORE, CAR PARK,
SERVICING, ACCESS AND LANDSCAPING
SITE OF AMBULANCE DEPOT AND HIGHWAYS DEPOT, RUTHIN ROAD, WREXHAM, LL13
7TU**

Thank you for consulting us on the above application, which we received on the 20th July 2015.

We have no objection to the proposed development, but have the following comments:

Flood Risk

The application site is almost entirely in Zone A, with a relatively minor portion of the north of the site in Zone C2 as defined in TAN 15 Development & Flood Risk (2004) and shown on Welsh Government's Development Advice Map (DAM). However, due to the recent developments adjacent to the site, the DAM may not accurately represent the flood risk to the area.

The development may increase the surface area of impermeable ground on the site, thus reducing percolation and increasing rapid surface water runoff. In accordance with Section 8 of TAN 15, in all zones, development should not increase flood risk elsewhere. In addition, it should be noted that part of the proposed vehicular access to the site falls within Zone C2.

Surface Water Management

The application form indicates that surface water will be discharged to mains sewer. However, your Authority should note that if the existing site previously discharged surface water into a combined public sewer, it is now likely that the Sewerage Undertaker, i.e. DCWW, will require this to be removed from their system. In this instance, the surface water will either need to be infiltrated on site, discharged into a nearby watercourse, or where this is justified as unfeasible, at a rate agreed with them into their public system. There is no obvious suitable receiving watercourse within the site and any connection through third party land would require the agreement of that party.

Therefore, we would **strongly recommend** that, prior to the issue of planning permission, the applicant produces a surface water management proposal demonstrating that the proposed

method of surface water management is viable. This would avoid the risk that planning permission is given for a development for which there is no suitable option available to discharge surface water.

Should your Authority be minded to grant planning permission, 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. 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 either prior to grant of planning permission, or to discharge surface water drainage 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.

Access and Egress

As noted above, part of the proposed vehicular access to the site falls within Zone C2, so we would recommend that you discuss this with your Emergency Planners who may require the applicant to supply further information on the flood risks at the site access point, and to produce a suitable Flood Plan.

Protected Species

Bats are protected under the Wildlife and Countryside act 1981 (as amended), the Countryside and Rights of Way Act 2000 and Schedule 2 of The Conservation of Habitats and Species Regulations 2010 (as amended).

NRW is satisfied that the bat survey (Rachel Hacking Ecology, Daytime Bat Survey) has been carried out to an acceptable standard. The report states that there was no evidence that the structures/trees were currently being used as bat roosts and that they had low potential as a roost. It is therefore unlikely that bats or their roosts will be impacted upon by the proposed works.

Your Authority should ensure that conditions attached to any planning permission issued, ensure that the recommendations within the report are carried out so as to avoid damage to bats. The applicant should be advised that should bats be discovered at any stage during the works, all work should stop immediately and NRW contacted for further advice.

Please note that we have not considered possible effects on all local or regional interests. 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).

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 website has guidance for assessing proposals that have implications for section 42 habitats and species (www.biodiversitywales.org.uk).

Pollution Control and Waste Management

As the site is within, or adjacent to a site that historically has been used as a Highway Depot, which could give rise to historical land contamination, we recommend that you consult with your Contaminated Land Officer regarding this matter.

If, during construction/excavation works, any contaminated material is revealed, then the movement of such material either on or off the site should be in consultation with your Contaminated Land Officer and/or NRW.

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.

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.

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".

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

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cc: JLL