

CYNGOR CYMUNED SESSWICK
SESSWICK COMMUNITY COUNCIL

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The Planning Inspectorate
Crown Buildings
Cathays Park
Cardiff CF10 3NQ

wales@planninginspectorate.gov.uk

Dear Sir/ Madam,

Re: Planning Reference P/2020/0363. Commercial glasshouse with packing facility and office space, energy centre and associated infrastructure, carbon dioxide recovery plant, reservoirs, car parking and landscaping.
Land west of Sesswick Way, Marchwiell, Wrexham LL13 0TF

Sesswick Community Council strongly objects to this proposed development.

This is a major proposal of industrial size, which lies outside the boundary of the designated Wrexham Industrial Estate, and would involve the destruction of 37 acres of green belt, a vast area of prime grassland and best and most valuable agricultural land. Wrexham County Unitary Development Plan has indicated that any future developments should take place on the North side where there is a better infrastructure and excellent access to the major route ways.

This is a proposed major development that would be sited in proximity to a **known flood zone along the Clywedog**, which has seen regular major flooding in recent years affecting the roads and causing flooding and water logging in the adjoining fields. The flooding has brought many serious issues to this locality and surrounding area. This is a most unsuitable location for such a major development of this kind. It has many concerns, and planning issues of which some have never been approached before.

Flooding along the Clywedog, west of Sesswick Way and Cefn Road

The flooding near Five Fords access occurs as a result of the collection of rainwater in the upper reaches of the Clywedog River and surrounding catchment areas. The proposed site is adjacent to a well known flood zone that has seen in the last several years very bad flooding especially in the wetter winter months. See NRW Flood Map Fig 1 and photo of A525 in a typical winter, attached to this document.

A once in every 100 years event of heavy rainfall can no longer be the assumed norm and it is now recognized that we are experiencing more extreme weather conditions and recent years has shown this to be true. The low lying land and nature of the underlying clay substrate makes it prone to water logging and flooding.

Many recent winters have seen high, if not record rainfall. The winter of 2019/2020 was a period of high intense rainfall that caused flooding so extreme it **cut off many of the local roads** in the Five Fords area and A525 and the winter of 2020/2021 was the **fifth highest on record** seeing many of the fields in the area flooded and roads yet again in flood cutting off many routes to traffic and causing major disruption.

The **Planning Policy Wales** (TAN 15) Technical Advice Notes 15: Development and Flood Risk states in section 3.1 as follows ...

3.1 the general approach of PPW, supported by the TAN, is to advise caution in respect of new development in areas of high risk of flooding by setting out a precautionary framework to guide planning decisions. The overarching aim of the precautionary framework is, in order of preference, to:

- **Direct new development away from those areas which are at high risk of flooding**

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This is the top priority in the list of the TAN 3.1 section. It is clear that the planning policy of Wales is against any development being sited on a known high-risk flood zone.

The disruption brought about by flooding along the Clywedog near Five Fords access and on the A525 degrades the well-being of local people and affects their lives and living conditions, and disrupts businesses and the day to day movements of industrial traffic to the nearby Industrial Estate.

The **Planning Policy Wales** Technical Advice Note (TAN 15) Development and Flood Risk states...

- Flooding can place lives at risk, cause considerable personal trauma, result in extensive damage to property, often amounting to millions of pounds, and severely disrupt communications, business and commerce.

The proposed development at this site would place a 37-acre (approx. 150,000 square meters) non-permeable surface layer over good agricultural land and would endanger and exacerbate an area prone to flooding, and no amount of computer modeling or water management could reduce the possibility of flooding in this area. A development of this nature will create an immediate high risk potential of flooding consequences within the area, and should be avoided. Again Planning Policy Wales TAN 15 2.8 highlights the need to avoid development in areas of high risk flood zones as stated below...

- 2.8 The affordability of flood cover, and the associated costs of coping with flooding consequences, reinforces the overall principle of **avoiding development in areas where the consequences of flooding will be unacceptable**

Flood zones have in recent years have been an area of annual problems having serious negative impact on people's lives with catastrophic effects on public health and the environment. This in many cases has been a result of development placed in such flood zones and catchment areas. Development and in particular large developments that are sited on or near Flood Zones cannot be sustainable and will cause a lot of disruption and reduce not only the well-being of local people **but can create a legacy of problems for future generations.**

This is a recognized factor and forms part of the Planning Policy Wales TAN 15 2.10 which states...

- 2.10 The Assembly has a duty, under section 121 of the Government of Wales Act, to promote sustainable development in the exercise of its functions. The planning system has a key role to play in the delivery of sustainable development by providing for homes, infrastructure, investment and jobs in a way which is consistent with sustainable development principles (section 2.2 PPW). **In doing so it must provide development, which is sustainable in the long term, and not create a legacy of problems for future generations.**

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This 37 acre grassland not only absorbs rainfall within it, but absorbs rainwater from adjacent fields to mitigate water runoff to alleviate further flooding along the Clywedog. This would no longer be the case if this grassland was removed. The proposed greenhouse structure would be sited on a concrete base of approximately 150,000 square metres (37 acres) and would create **a massive non-permeable surface to rain water** and to the water runoff from adjacent fields. **It would obstruct rainwater absorption and run-off from surrounding fields thereby causing a backward flow up ditches and streams, like Bedwell Brook, to cause flooding in other areas within the community nearer to homes.** This development will not only increase flooding near Five Fords access but also in other surrounding areas and all along the lower reaches of the Clywedog River.

The Planning Policy Wales TAN 15 alerts decision makers to this danger as outlined in section 8 of TAN 15 and as follows...

8 Surface water run-off from new development

- 8.1 All types of land use change will impact on the natural hydrological cycle in one way or another and flooding is not confined to flood plains, as heavy rain falling on waterlogged ground can cause localised flooding almost anywhere. **In all zones, development should not increase the risk of flooding elsewhere. Run- off from developments in these areas can, if not properly controlled, result in flooding at other locations and significantly alter the frequency and extent of floods further down the catchment.** In many instances this will be determined by local knowledge and where such concerns are suspected planning authorities should consult the relevant competent authority on a case-by-case basis, who will determine what, if any, attenuation is to be required.

A development of this nature which is unknown and on a site of high flood risk and regular flooding brings grave doubts to its suitability and could not be seen as a sustainable development that would

meet human needs but would compromise future generations to meet their own needs and sustain the ability of natural systems to provide the natural resources and ecosystems that people and society depend.

This is not only a novel application with novel planning issues but in a location that is most unsuitable and would not be sustainable in this vulnerable flood zone.

The amount of water collected from every inch of rainfall on a roof totalling 151,200 square metres to be pumped to manmade reservoirs would be 3,840 cubic metres of water, which is 843,648 gallons of water. **The 11.35 inches of rainfall recorded in February 2020 for this area would give a catchment for this size of roofing of 9.57 million gallons of water.** This is a massive amount. The water management for such a development would be a “forever” commitment; **this is a legacy that should not be imposed on future generations.** TAN 15 2.10 above warns against this.

Abandonment of such a proposed site

Companies, even those in the food industry do go through financial and commercial difficulties and trending changes that can often lead to financial problems and food companies often become bankrupt resulting in the abandoning of such production sites.

If ever such a development of this nature were to be abandoned due to economical reasons or the fall in demand of its product, the water management and maintenance of the roofing would have to continue indefinitely.

If such a site of this proportion was abandoned the rainwater collected in the reservoirs would no longer be used for watering the product and once these reservoirs are full, and if rain water runoff from the roofing was still directed to the reservoirs, the inevitable outcome would be a full overflow leading to catastrophic flooding of this area, and obstruction of ditches and the flow of Bedwell Brook which flows close to housing in Cross Lanes. See Map. The excess water would have no outlet via an already flooded Clywedog River.

A danger that section 8 of the TAN 15 highlights in a previous paragraph and alerts planners to.

If ever a legacy of indefinite water management and structure maintenance was left to our future generations, then key questions are...

- Who would pay for the maintenance of the water management?
- Who would pay for the maintenance of the roofing? (If this roofing failed, the massive water collection would flood into the surrounding area and lead to catastrophic flooding)
- Who would pay for the removal of the concrete if this became the only solution to the many problems it would create?

These very large proposed structures make this an unsustainable development and as directed in **Planning Policy Wales TAN 6 PLANNING FOR SUSTAINABLE RURAL COMMUNITIES** it states...

- 6.2.1 When preparing development plans and considering planning applications, planning authorities should consider the quality of agricultural land and other agricultural factors and seek to minimise any adverse effects on the environment.
- 6.2.2 Planning authorities should bear in mind that, once land is built on, **the restoration of semi- natural and natural habitats and landscape features is rarely possible and usually expensive**, and archaeological and historic features cannot be replaced. **Also, once agricultural land is developed, even for 'soft' uses such as golf courses, its return to agriculture as best and most versatile agricultural land is seldom practicable.**

There are many unknown factors that come with this novel if not unwarranted method of food production that would be sited on a known high-risk flood zone and such new large developments should be directed away from high risk flood zones.

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This cannot be considered low carbon farming

The claim of low carbon farming which by the very nature of its operation and siting is not justifiable. The documentation released on this proposed development has given people and residents the impression that it is low carbon farming and that it gets its power from Five Fords effluent treatment works. This claim cannot be substantiated. This proposed operation would have to import and use **15.75 MVA (15.75 Mega Volt Amps)** of electrical power from the national grid. This massive amount of energy use has an immense carbon footprint putting **97,777 metric tons of carbon dioxide*** into the environment, adding to global warming.

But what does this amount of energy use and carbon dioxide emission really equate to. The following shows this...

97,777 metric tons of carbon dioxide per year is equivalent to...

21,265 passenger vehicles driven for one year

11,002,242 gallons of petrol consumed

49,000 metric tons of coal burned

*Calculated by rapid tables.com

The use of such large amounts of power and energy to produce food makes this method of farming one of **very high carbon** emissions. Only a small amount of carbon dioxide in comparison would be taken from Five Fords, this process may also use power, which negates any carbon reduction from this.

TAN 5 of the Planning Policy Wales makes clear in section **2.1 The Key Principles of Positive Planning for Nature Conservation** to ...

- Plan to accommodate and **reduce the effects of climate change and energy consumption** and that help habitats and species to respond to climate change. (PPW 2.2.1 and 2.3.2)⁶

Furthermore...

TAN 5 Environmental Impact Assessment

4.5.1 states ...

- It should ensure that the impacts of projects likely to have a significant effect on the environment are thoroughly investigated, understood and considered before deciding whether or not to grant consent.

It is well established that **correctly managed grasslands** of this type are as an **effective carbon sink as rainforests**, helping the environment and the **reduction of carbon emissions, which help reduce global warming**. In America, **grasslands are being preserved** as part of their policy to reduce carbon emissions and reduce global warming. **These 37 acres of grassland at Five Fords are an effective carbon sink that reduces carbon dioxide and helping to reduce global warming, this grassland should be conserved as a benefit to the environment and not capped with concrete.**

A fact that is made clear in PPW TAN 5 2.1

2.1 The Key Principles of Positive Planning for nature conservation

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- plan to accommodate and reduce the effects of climate change by encouraging development that will reduce damaging emissions and energy consumption and that help habitats and species to respond to climate change (PPW 2.2.1 and 2.3.2)⁶

The original response from the Department for Environment and Rural Affairs for this proposed development made a strong objection to this proposal as their statement declares.....

- *The proposal has failed to apply the sequential test and justify the loss of Best and Most Value (BMV) agricultural land in accordance with the procedure required by PPW 3.54 & 3.55. Consequently, the Department for Environment and Rural Affairs of Welsh Government wishes to express its OBJECTION to this planning application.*

Noise

The majority of the massive amount of electrical power this development would use is for the large cooling and heating equipment associated with this development. Greenhouses as everyone knows are extremely hot in summer and very cold in winter. For such a massive greenhouse it will require massive heating for winter and cooling for summer. Using these heating and cooling machines generate high levels of noise and the published figures show this fact giving an approximate total of 109.8 decibels from internal equipment and 70 decibels for external equipment. This can only be of great concern to the close residential areas surrounding this site. Also of concern is the noise from the movement of HGV's and passenger vehicles in the daily running of the plant, and the noise from the refrigerated HGV's standing on fore courts during loading etc., which as most people know is a high level of noise.

Farming Policy

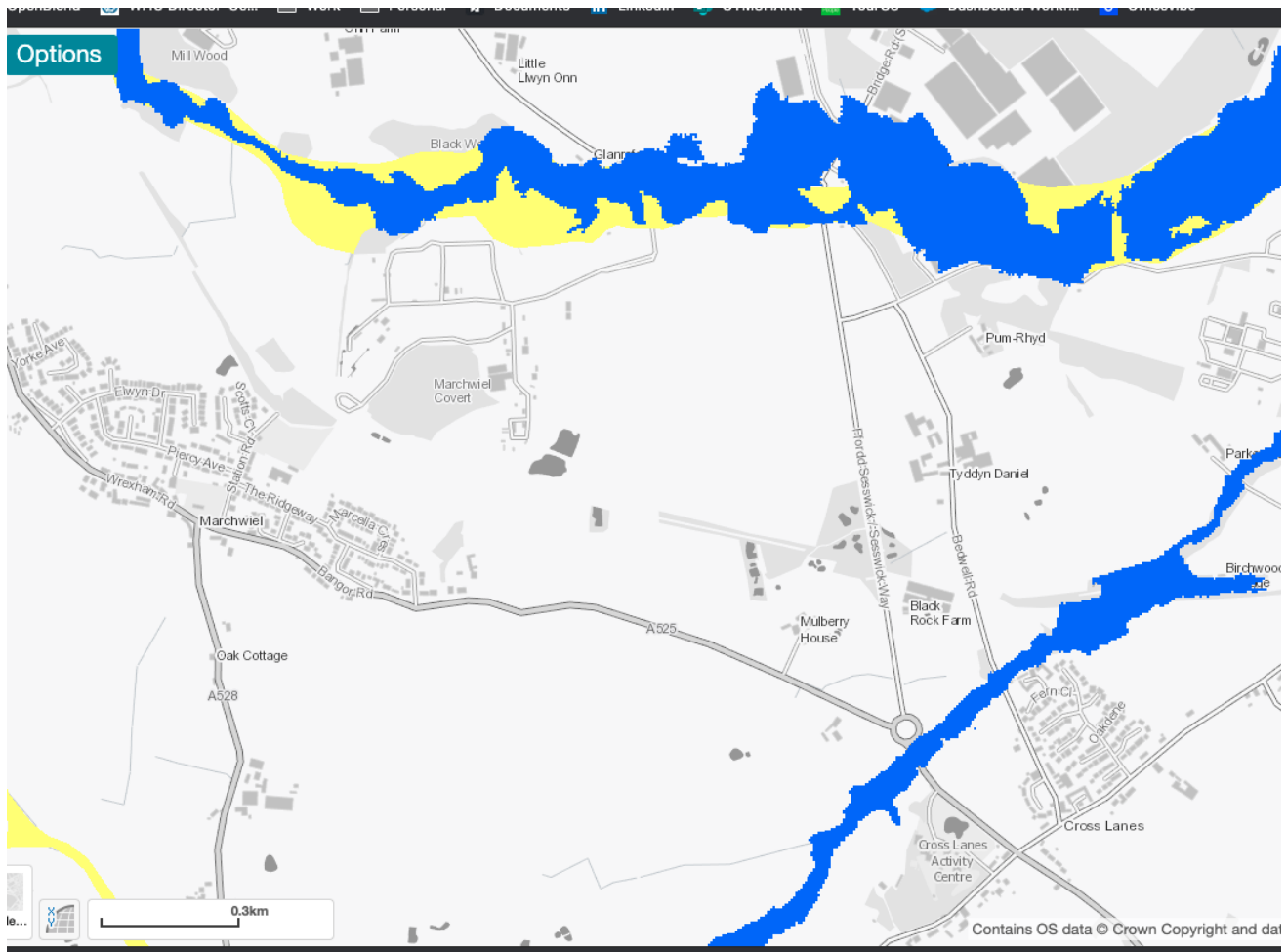
The people of Wales are a very nature conservation nation and they would not like to see farming of this nature. They wish for a policy that is environmentally friendly, natural growing processes and minimum or zero energy use. The taking away and capping of 37 acres of prime land by covering over with concrete to grow food is an action that would not seek the natural processes which people expect. The hydroponic greenhouses use massive amounts of energy; they remove green pastures, put large amounts of carbon dioxide into the environment and produce food that is low on taste, low on nutrition and high in cost to the consumer. These greenhouses can be and are often plagued with pests, such that an expensive cleaning operation has to be conducted.

Any new large development should be directed away from areas of high risk flooding, or on sites which are compromised as a result of adjacent flood zones, as is the case of this proposed site. The Planning Policy Wales Technical Advice Notes make clear this fact. The site is inappropriate and it

would be unsustainable, generate a legacy of problems for future generations and create many issues that would not be surmountable.

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NRW Flood Map Fig 1 Showing the extent of the Flood Zones



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Typical scene of flooding on the A525 near Bedwell Brook flood zone with water coming off the surrounding fields during a typical winter.



Yours faithfully,

Miss Jan Picken
Clerk to Sesswick Community Council