

Pre -Application Consultation Report (PAC Report)

Proposed site extension, installation of 2no. kiosks and modified access at Church Stoke Sewage Treatment Works , Powys.

Prepared by Fisher German LLP

Project Title

Church Stoke Sewage Treatment Works

Agent

Fisher German LLP

Contact details

The Estates Office
Norman Court
Ashby de la Zouch
LE65 2UZ

maxwell.griffin@fishergerman.co.uk

FP 126444

28 November 2022

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1. Introduction

- 1.1 This Pre-Application Consultation (PAC) Report has been prepared by Fisher German LLP on behalf of Hafren Dyfrdwy Water Limited (HD) to support a planning application for a proposed development at Church Stoke Sewage Treatment Works (STW), A490, Church Stoke, Powys, Wales, SY15 6DS. The proposed development comprises a site extension to Church Stoke STW, modified access to the site and the installation of 2no. kiosks on the existing operational site. These works are required to meet the limits of the new phosphorus permit which is due to be introduced at the STW site. Full planning permission is sought for the proposed development.
- 1.2 A statutory requirement to consult on major development schemes is imposed by section 61Z of the Town and Country Planning Act 1990 and Part 1A of The Town and Country Planning (Development Management Procedures) (Wales) Order 2012 (as amended) (DMPWO). The definition of major development is set out in Article 2 of the DMPWO and includes waste development. Therefore, the proposed development falls within the requirement to undertake pre-application consultation.
- 1.3 This PAC Report outlines how the applicant (HD) have complied with its duty to carry out pre-application consultations on the proposed waste development. This includes:
- Making draft planning application documents available to view;
 - Notifying the right consultees of the consultation; and
 - Providing a 28 consultation period.
- 1.4 This report also provides details of all of the consultation responses which were received during the pre-application consultation period and explains how the responses have been considered and used to guide the final design of the submitted proposals for this scheme.

2. Consultation Approach

2.1 This section of the report outlines how the pre-application consultation has been carried out so that all of the requirements of DMPWO have been met. This includes details of who was consulted, how they were consulted and what information was made available.

Statutory Consultation Activities

Site Notice

- 2.2 A site notice is required to be erected (in English and Welsh) for public viewing in at least one place on or near land to which the proposed application relates for a period of no less than 28 days. The site notice will inform residents of the proposals, the consultation taking place and provide details on how to respond to the consultation.
- 2.3 Two site notices were produced, one in English and one in Welsh. They included the information set out in Schedule 1B of the 'Publicity and Consultation before Applying for Planning Permission Notice under Articles 2C and 2D' – DMPWO and a copy of the notices is available in Appendices A and B.
- 2.4 The notices were printed and laminated and then attached to the entrance gate to the site with zip ties. The notices were erected in this location as this is the only entrance to the site and there are no public rights of way in proximity to the site. Figures 1 and 2 below show the site notices in situ. These were erected on the 17 October and remained in place for 28 days.



Figure 1 - Site Notice (close up)



Figure 2 - Site Notice

Landowners

- 2.5 The applicant must also send a copy of the site notice to any owner or occupier of land adjoining the application site.
- 2.6 Only one adjoining landowner / occupier was identified and they were sent a copy of the notice (see Appendix A) and a covering letter explaining why they had received the notice (Appendix C).
- 2.7 The landowner who was contacted was: [REDACTED] (redacted to comply with relevant data protection legislation).
- 2.8 The letter was dated 17 October 2022 and posted first class on the same day. This allowed for the consultation period to run for 28 days with the end of consultation being the 14 November 2022.

Community Consultees

- 2.9 The applicant must also send a copy of the site notice to the relevant community consultees. In this case, these comprise the Community Council and each councillor (local member) representing the electoral ward in which the proposed development would be situated.
- 2.10 A copy of the site notice was sent via email to the clerk of Church Stoke Community Council on the 17 October 2022 and they forwarded the notice onto the councillors which included: Cllr M J Jones, Cllr A Richards, Cllr B L Smith, Cllr C P Smith, Cllr J N Wakelam, Cllr M Whittall and Cllr D N Yapp. Confirmation that all of the councillors had received the notice was received from the clerk.

Specialist Consultees

2.11 Schedule 1C under Article 2D - Consultation Before Applying for Planning Permission- DMPWO sets out the information which must be sent to the relevant 'specialist consultees'. Schedule 4 of the DMPWO provides details of the specialist consultees and when they should be consulted. Which specialist consultees you are required to consult is dependent on nature of the proposed development. In this case, the specialist consultees consulted as part of this pre-application consultation were:

- Powys Highways
- The Natural Resources Body for Wales
- The Fire and Rescue Authority

2.12 The specialist consultees were provided with an Article 2D Notice, in accordance with Schedule 1C of the DMPWO, a copy of this notice is provided in Appendix D. These notices were sent via email which explained why they were receiving the notice and explained their duty to provide a substantive response within 28 days.

Draft planning Application

2.13 All the draft planning application documents and supporting information must be made available for public viewing as part of the consultation. The following draft application documents were provided:

- Planning, Design and Access Statement
- Site Location Plan
- Existing Site Layout
- Proposed Site Layout
- New Site Area Elevations
- New Kiosks Elevations
- Proposed Perimeter Fence Detail
- Junction Improvements & Visibility Assessments
- Preliminary Ecological Appraisal and Baseline BNG Assessment
- Badger and Dormouse Survey Letter Report
- Biodiversity Net Gain Assessment
- Clwyd-Powys Archaeological Trust Desk Based Assessment
- Landscape and Visual Impact Appraisal & Landscaping Proposal
- Flood Consequence Assessment & Drainage Strategy

2.14 These were made available via a publicly accessible drop box file which could be accessed using a link on the Article 2C and 2D notice and the Article 2D Notice. A 'tinyurl' was used to shorten the web address of the drop box file to make it easier for anybody who needed to manually type in the link.

2.15 A local public building with computer facilities was identified so that those without internet access could still view the documents and provide comments. This facility was Newtown Library and the address and opening times was provided on the notice.

Postal Address and Email Address details

2.16 The applicant is required to provide details of how they can be contacted by persons wishing to comment on the proposed development. The contact details provided for consultees to submit their comments were:

- By Post:

C/O Planning Department
The Estates Office
Norman Court
Ivanhoe Business Park
Ashby de la Zouch
LE65 2UZ

- By email: planning.consultations@fishergerman.co.uk

3. Pre -Application Consultation Responses

3.1 This section provides the consultation responses which have been received during the pre-application consultation process. It also clearly shows which category of consultee each respondent fits into.

3.2 These responses are those received during the consultation period which was held for 28 days between the 17 October 2022 and the 14 November 2022.

Site Notice / Landowner

3.3 No response was received from the adjoining landowner or from any other members of the public who may have viewed the site notice.

Community Consultees

3.4 A response was received from the community council on the 28 October 2022 which is summarised below. A full copy of the response can be found in Appendix E.

3.5 The Community Council met on the 27 October 2022 to discuss the proposal and overall are in support of the proposal. However, they asked that more visual screening is provided around the site and that sufficient measures are in place to mitigate the potential overflow in times of heavy rainfall.

3.6 The proposal includes a new 68m long native species-rich hedgerow along the western boundary of the site extension and a new broadleaved woodland in the northern area of the site extension. These features will both act as screening but also ensure the development provides a net gain in biodiversity.

3.7 The scheme does not have any impact on Combined Sewer Overflow performance. However, the project has been designed taking account of predicted population growth and all new assets have been sized to accommodate increased future flows. Ongoing monitoring of site performance will ensure the sites capabilities continue to serve the community.

Specialist Consultees

3.8 Responses which were received from the specialist consultees and are summarised below.

Mid and West Wales Fire and Rescue Service

3.9 The Building Regulation Team at Mid and West Wales Fire and Rescue Service provided a consultation response on the 27 October 2022. A full copy of the consultation response can be found in Appendix F.

3.10 They requested confirmation that the proposed development meets the requirements of B5 Approved document B (Wales) 2020 in relation to water supplies and vehicle access for firefighting purposes.

3.11 The proposed development meets the requirements of B5 Approved document B (Wales) 2020 in relation to water supplies and vehicle access for firefighting purposes. Specifically in accordance

with paragraph 17.2 there will be vehicle access to at least 15% of the perimeter of all of the proposed buildings.

Natural Resource Wales

- 3.12 A response was received from Natural Resource Wales on the 14 November 2022 which is summarised below. A full copy of the response can be found in Appendix G.
- 3.13 The response sets out a request that the Preliminary Ecological Appraisal Report and Baseline BNG Assessment prepared by Penny Anderson Associates Ltd appointed as consultant ecologists by HD is conditioned as an approved document in the decision notice. The recommendations made within the report will be followed and therefore this is considered an acceptable request.
- 3.14 NRW state that further information is needed to demonstrate that the surface water drainage does not pollute the water environment. In order to ensure the proposal demonstrates suitable environmental management the Flood Consequence Assessment & Drainage Strategy has been updated to include a section regarding Pollution Control (Section 6.2.4). This demonstrates that the proposed pond is adequate to provide adequate water quality treatment for the access road for the dosing plant as the mitigation indices are higher than the pollution hazard indices. For access from the A490, the gully used to collect the surface water and the tank used to attenuate the discharge do not offer any additional pollution mitigation measure, however the pollution hazard is considered low. The proposal matches the existing regime, discharging the surface water into the existing highway drainage along the A490, therefore it can be considered that the risk of pollution has not been increased.
- 3.15 NRW mentioned the impact of external lighting on bats. This is not a notable consideration as no external lighting is proposed.
- 3.16 Due to the proximity of the site to the River Camlad they have stated that all works at the site must be carried out in accordance with GPP5 and PPG6: 'Works and maintenance in or near water' and 'Working at construction and demolition sites'. To ensure the watercourse is not impacted by the proposed works, these guidelines will be followed during construction.
- 3.17 NRW have stated that they have no objection on flood risk grounds to the application and have no further comments to make regarding the impacts of the development on landscape.
- 3.18 In summary the comments from NRW have been useful and all the comments have been considered and acted upon where necessary, particularly in regard to environmental management.

Powys Highways

- 3.19 Powys Highways were sent the Article 2D Notice via email on the 17 October 2022. The email used was tls.helpdesk@powys.gov.uk, which is the one listed on the Powys County Council website. A follow up email was sent on the 27 October 2022 as no response had been received and a known highways officer at Powys County Council was copied in.
- 3.20 A response was received on 31 October 2022 from that highways officer requesting for the 28 days to begin from when we sent the Article 2D Notice directly to them as a response by the 14th

November would have been challenging due to annual leave and workload. This new date for a response was therefore 24th November 2022.

- 3.21 Several chaser emails were sent however no response was received or a request for a further extension of time. Due to tight timescales in the programme HD require that the application is submitted by 28 November 2022. Consequently, the application has been submitted without a formal response from highways. However, there has been proactive informal consultation earlier in the planning application preparation process with Powys Highways officers which informed design development.

4. Conclusion

- 4.1 This full planning application is submitted by Hafren Dyfrdwy Water Limited for the proposed development which comprises a site extension to Church Stoke STW, modified access to the site and the installation of 2no. kiosks on the existing operational site.
- 4.2 As the proposed development is a waste development and constitutes a major development, it falls within the requirement for pre-application consultation in accordance with section 61Z of the Town and Country Planning Act 1990 and Part 1A of The Town and Country Planning (Development Management Procedures) (Wales) Order 2012 (as amended) (DMPWO).
- 4.3 This PAC Report details the pre-application consultation activities which have been undertaken, the consultation responses which have been received and how these comments have been taking into consideration.
- 4.4 As a result of the consultation no significant changes have been made to the proposed plans.
- 4.5 The pre-application has been undertaken with the relevant stakeholders and has been timely, meaningful and effective and the statutory requirement to consult has been satisfied.

Appendix A – Site Notice (English)

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2C AND 2D

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority (“LPA”). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representation to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at *Church Stoke Sewage Treatment Works (STW), A490, Church Stoke, Powys, Wales, SY15 6DS*

I give notice that *Hafren Dyfrdwy Water Limited*

Is intending to apply for planning permission to: *Provide a site extension, upgrade the access to the site and install 2no. kiosks on the existing operational site.*

You may inspect copies of:

- The proposed application;
- The plans; and
- Other supporting documents

Online at <https://tinyurl.com/churchstokestw>

And computer facilities are available to view this information online at *Newtown Library, Park Lane, Newtown, Powys, SY16 1EJ*, between the hours of:

Monday - 9am - 5pm
Tuesday - 9am - 6pm
Wednesday - Closed
Thursday - 9am - 5pm
Friday - 8am - 4pm
Saturday - 9.30am - 1pm
Sunday – Closed

Anyone who wishes to make representation about this proposed development must write to the applicant / agent at planning.consultations@fishergerman.co.uk or C/O Planning Department, The Estates Office, Norman Court, Ivanhoe Business Park, Ashby de la Zouch, LE65 2UZ.

By 14th November 2022

Signed: Maxwell Griffin



Date: 17/10/2022

Appendix B – Site Notice (Welsh)

Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012

CYHOEDDUSRWYDD AC YMGYNGHORIAD CYN GWNEUD CAIS AM HYSBYSIAD CANIATÂD CYNLLUNIO O DAN ERTHYGLAU 2C A 2D

Pwrpas yr hysbysiad hwn: mae'r hysbysiad hwn yn rhoi cyfle i wneud sylwadau'n uniongyrchol i'r datblygwr ar ddatblygiad arfaethedig cyn cyflwyno cais cynllunio i'r awdurdod cynllunio lleol ("LPA"). Bydd unrhyw gais cynllunio dilynol yn cael ei roi cyhoeddusrwydd gan y Awdurdod Cynllunio Lleol perthnasol; ni fydd unrhyw sylwadau a ddarperir mewn ymateb i'r hysbysiad hwn yn niweidio'ch gallu i gyflwyno cynrychiolaeth i'r Awdurdod Cynllunio Lleol ar unrhyw gais cynllunio cysylltiedig. Ni ddylech fod unrhyw sylwadau a gyflwynir yn cael eu rhoi ar y ffeil gyhoeddus.

Datblygiad arfaethedig yng *Ngwaith Trin Carthion Church Stoke, A490, Church Stoke, Powys, Cymru, SY15 6DS*

Rwy'n rhoi hysbysiad bod *Hafren Dyfrdwy Water Limited*

Yn bwriadu gwneud cais am ganiatâd cynllunio i: *Darparu estyniad safle, uwchraddio'r mynediad i'r safle a gosod 2no. kiosks ar y safle gweithredol presennol.*

Gallwch archwilio copïau o:

- Y cais arfaethedig;
- Y cynlluniau; a
- Dogfennau ategol eraill

Ar-lein yn <https://tinyurl.com/churchstokestw>

Ac mae cyfleusterau cyfrifiadurol ar gael i weld yr wybodaeth hon ar-lein yn *Llyfrgell y Drenwydd, Lôn Park, Y Drenwydd, Powys, SY16 1EJ*, rhwng oriau man:

Dydd Llun - 9am - 5pm

Dydd Mawrth - 9am - 6pm

Dydd Mercher - Closed

Dydd Iau - 9am - 5pm

Dydd Gwener - 8am - 4pm

Dydd Sadwrn - 9.30am - 1pm

Dydd Sul - Closed

Rhaid i unrhyw un sy'n dymuno gwneud cynrychiolaeth am y datblygiad arfaethedig hwn ysgrifennu at yr ymgeisydd/ asiant yn planning.consultations@fishergerman.co.uk neu C/O Planning Department, The Estates Office, Norman Court, Ivanhoe Business Park, Ashby de la Zouch, LE65 2UZ.

Erbyn 14 Tachwedd 2022

Arwyddwyd: Maxwell Griffin

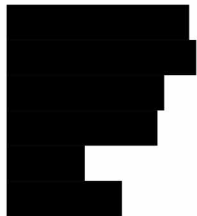


Dyddiad: 17/10/2022

Appendix C – Cover Letter to Landowner

Our Ref: 126444

17 October 2022



Dear ,

TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 – NOTICE UNDER ARTICLES 2C AND 2D PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

I am writing on behalf of our client Hafren Dyfrdwy Water Limited to serve the enclosed notice under Articles 2C and 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 relating to the pre-application consultation for proposed works at Church Stoke Sewage Treatment Works. The application relates to the provision of a site extension, an upgrade to the access to the site and installation of 2no. kiosks on the existing operational site.

It is understood that part of the land within the application site is situated on land within your ownership.

This notice invites you to review the information about the proposals, available via the link on the notice, and to provide any comments you may have, prior to the submission of the planning application.

Should you have any queries, or require any additional information regarding the proposal, please do not hesitate to contact me.

Yours sincerely,



Maxwell Griffin
For and on behalf of Fisher German LLP

mobile: 
email: maxwell.griffin@fishergerman.co.uk

Encs: Articles 2C and 2D Notice dated 17th October 2022

Appendix D – Specialist Consultee Notice

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLE 2D

Purpose of this notice: this notice comprises a formal request for a pre-application consultation response under article 2D of the Town and Country Planning (Development Management Produce) (Wales) Order 2012.

Proposed development at *Church Stoke Sewage Treatment Works (STW), A490, Church Stoke, Powys, Wales, SY15 6DS*

I give notice that *Hafren Dyfrdwy Water Limited*

Is intending to apply for planning permission to: *Provide a site extension, upgrade the access to the site and install 2no. kiosks on the existing operational site.*

A copy of the proposed application; plans; and other supporting documents can be viewed online at <https://tinyurl.com/churchstokestw>

In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Produce) (Wales) Order 2012, a consultation response must be sent to planning.consultations@fishergerman.co.uk by 14th November 2022.

Signed: Maxwell Griffin



Date: 17/10/2022

Appendix E – Community Council Consultation Response

clerk@churchstoke.org

www.churchstoke.org



CYNGOR CYMUNED YR YSTOG CHURCHSTOKE COMMUNITY COUNCIL

E J Humphreys MA Oxf, CertHE Community Governance, FSLCC
Clerc i'r Cyngor | Clerk to the Council

2 Rows Terrace, Plough Bank, Montgomery, Powys, SY15 6QD.

28th October 2022

Fisher German LLP
C/O Planning Department
The Estates Office
Norman Court
Ivanhoe Business Park
Ashby de la Zouch
LE65 2UZ

By email attachment to
planning.consultations@fishergerman.co.uk

Dear Sir or Madam

Pre-Applications Consultation by Developers – response from Churchstoke Community Council

Following the meeting of the Community Council on 27th October 2022, Council would like to submit its response to consultation(s) as tabled below:

S = support, O = object, N = note,

Ref.	Applicant	Site	Description	rec.
FP 126444	Fisher German LLP on behalf of Hafren Dyfrdwy Water Ltf, C/O Planning Department, The Estates Office, Norman Court, Ivanhoe Business Park, Ashby de la Zouch	Church Stoke Sewage Treatment Works (STW), A490, Church Stoke	Provide a site extension, upgrade the access to the site and install 2no. kiosks on the existing operational site	S*

*FP 126444: The community council supports the pre-application proposal, and asks additionally that more visual screening is provided around the site, and that sufficient measure are in pace to mitigate the potential overflow in times of heavy rainfall.

Yours faithfully

E J Humphreys
Clerc i'r Cyngor | Clerk to the Council

cc Cllr B L Smith

Appendix F – Mid and West Wales Fire and Rescue Service Consultation Response



Gwasanaeth Tân ac Achub
Canolbarth a Gorllewin Cymru

Mid and West Wales
Fire and Rescue Service

Prif Swyddog Tân | Chief Fire Officer

Roger Thomas BA(Hons), MSc

tancgc.gov.uk
mawwfire.gov.uk

Fisher German
Norman Court
Ivanhoe Business Park
Ashby de la Zouch
LE65 2UZ

FAO: Maxwell Griffin
planning.consultations@fishergerman.co.uk

Gofynner am/
Please ask for:
Rhif Est/Extn. No.

E-bost/E-mail:

Fy Nghyf/My Ref:

Dyddiad/Date:

Watch Manager Geraint Morgan

bregs@mawwfire.gov.uk

GM/KDT/00340785

27 October 2022

Dear Sir,

THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012

THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016

DEVELOPMENT PROCEDURE (CONSULTEES) (WALES) (MISCELLANEOUS AMANDMENTS) ORDER 2021 – FIRE AND RESCUE AUTHORITIES

RE: Churchstoke Sewage Treatment Works (STW), A490, Churchstoke, Powys SY15 6DS

APPLICATION NUMBER: N/A

I acknowledge receipt of the notification to the Mid and West Wales Fire and Rescue Authority in relation to the above application.

The site plan/s of the above proposal has been examined and the Fire and Rescue Authority would wish the following comments to be brought to the attention of the planning committee/applicant. It is important that these matters are dealt with early on in any proposed development

The following concerns are identified, in relation to the proposed developments, together with suggestions as to how these can be addressed.

1. Please confirm the Proposal meets the requirements of B5 Approved document B (Wales) 2020 in relation to water supplies and vehicle access for firefighting purposes.

The developer should consider the need to provide adequate water supplies and vehicle access for firefighting purposes on the site and general guidance on this matter is given in the attached

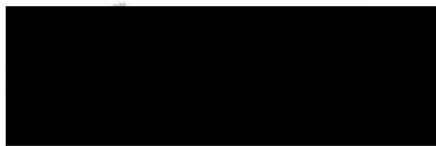
Appendix and the following links: <https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-of-water-for-firefighting-3rd-edition-jan-2007/>

<https://www.ukfrs.com/index.php/promos/16847>

Furthermore, the applicant should be advised to contact the Local Authority Building Control Department, which is the responsible authority, when determining issues concerning means of warning and escape, internal fire spread (linings and structure), external fire spread, access and facilities for the Fire and Rescue Service, in accordance with the 2007 version of Approved Document B (Wales).

The plan/s has been retained for record purposes.

Yours faithfully



Watch Manager G Morgan

Authorised Fire Safety Inspecting Officer

On behalf of the Mid and West Wales Fire and Rescue Authority

Appendix G – Natural Resource Wales Consultation Response



Ein cyf/Our ref: CAS-201339-X0Y8
Eich cyf/Your ref: ChurchstokeSTW

Welsh Government Building,
Rhodfa Padarn,
Llanbadarn Fawr,
Aberystwyth,
Ceredigion,
SY23 3UR

C/O Planning Department,
The Estates Office,
Norman Court,
Ivanhoe Business Park,
Ashby de la Zouch,
LE65 2UZ

ebost/email:
MidPlanning@cyfoethnaturiolcymru.gov.uk

14/11/2022

Annwyl / Dear Mr Griffin,

STATUTORY PRE-APPLICATION CONSULTATION - TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED.

BWRIAD / PROPOSAL: Site Extension, Installation of 2no, Kiosks and Upgraded Access

LLEOLIAD / LOCATION: Church Stoke Sewage Treatment Works (STW), Church Stoke, Powys, SY15 6DS

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 16/10/2022.

We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding environmental management. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.

We also advise that based on the information submitted to date, we would ask the planning authority to include the document identified below in the approved plans and documents condition on the decision notice.

Document: Preliminary Ecological Appraisal Report and Baseline BNG Assessment, by Penny Anderson Associates Ltd Consultant Ecologists, dated 2021, amended July 2022

Without the inclusion of this document by the planning authority we would be likely to object to the planning application.

Environmental Management

We have reviewed the Flood Consequence Assessment & Drainage Strategy (By Pell Frischmann, dated 03/10/2022) submitted in support of this application.

We note that surface water drainage from the site is currently split into three sections:

Section 1: Surface water is collected via gullies and flows to the existing pumping station.

Section 2: Surface water is collected via gullies and discharged into the river uncontrolled

Section 3: Surface water flows towards the road, is allowed to infiltrate into ground but likely flows directly onto the highway and collected by highway drains.

We note with the increased impermeable surfacing of the site additional surface water management is required; from the report we note that this will also be split into sections.

We note the surface water in the new impermeable area on the site is to be collected and passed through the treatment works. The surface water discharge from the new access road will be collected in a small pond and then discharged into the existing surface water network. At the site entrance surface water is to be collected and stored in a below ground tank and discharged into the highway drains at a lower, controlled rate.

Further information is needed to demonstrate that the surface water drainage does not pollute the water environment.

Applications need to include a plan of the proposed site that indicates all of the new and existing features that will control potential pollution of the nearby watercourse and the surface water flows from the development, we note that figure 9 shows the proposed pond and tank, however we require further details including:

- clean and foul drains (with direction of flow),
- any constructed soak away,
- gullies,
- french drains, and
- new or existing sustainable drainage including swales, reed beds or ponds.

Any relevant management controls should also be indicated.

Protected species

We have reviewed the Preliminary Ecological Appraisal report and Baseline BNG Assessment (By Penny Anderson Associates Ltd Consultant Ecologists, dated 2021, amended July 2022) and the Badger and Dormouse Survey Letter Report (reference BH/HD/220270, Dated 20/07/2022) submitted in support of the application.

We note that no protected species were found on site, with the additional dormouse survey advising it is unlikely that dormouse are present on the site due to the absence of field signs observed during the survey.

However, do note the potential for bats to be roosting in the mixed woodland and the suitable foraging habitat present on site. We note the further survey requirements in Section 5.1 and agree with the proposed additional bat survey.

We advise that should any additional external lighting be proposed as part of the development that a lighting design plan is submitted in support of the planning application. The lighting scheme shall be implemented in accordance with the approved plan.

Full details of lighting shall be submitted to and agreed in writing by the Local Planning Authority. The Lighting Plan should be compliant with the Institute of Lighting Professionals 08/18 Bats and artificial lighting in the UK and include:

- Details of the siting and type of external lighting to be used,
- Drawings setting out light spillage in key sensitive areas,
- Details of lighting to be used both during construction/conversion and post construction.

We would advise the local authority to secure the mitigation measures in section 5 by including the Preliminary Ecological Appraisal Report and Baseline BNG Assessment in the list of approved documents and plans.

Pollution Prevention

Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with GPP5 and PPG6: 'Works and maintenance in or near water' and 'Working at construction and demolition sites' which are available on the following website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

Flood risk

The planning application proposes less vulnerable development, a sewage treatment Works Our Flood Risk Map confirms the site to be partially within Zone C2 of the Development Advice Map (DAM) contained in TAN15 and the FMfP identifies the application site to be at risk of flooding and falls into Flood Zone 3 Rivers.

We have reviewed the Flood Consequence Assessment (FCA) & Drainage Strategy (By Pell Frischmann, dated 03/10/2022). Based on the existing use and proposed betterment, we agree with the FCA's justification of location, the resilience of the proposal and the mitigation measures recommended.

The proposed or permitted development that is in DAM C2 is within the existing treatment works perimeter and so there is no further intrusion closer to the main River Camlad. The additional development is in DAM zone A.

We advise all material arising from construction must be disposed of out of the recognised floodplain.

The FCA shows that the risks and consequences of flooding are manageable to an acceptable level. Therefore, we have no objection on flood risk grounds to the application as submitted.

Please be advised that the Environmental Permitting Regulations (2016) require a bespoke Flood Risk Activity Permit be obtained for any works or structures located in, under, over or within 8 metres of the bank top of the River Camlad, a designated "main river". Further advice and guidance is available on our website at:

<http://www.naturalresources.wales/permits-and-permissions/flood-risk-activities/flood-risk-activity-permits-information/?lang=en>

Landscape and Visual Impact

We note the landscape & Visual Impact Appraisal submitted in support of this application; the site lies within a registered historic landscape of outstanding Interest in Wales – Vale of Montgomery. We have no further comments to make regarding the impacts of the development on Landscape.

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our website. We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our website for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our website.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Harriet Power

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning

Cyfoeth Naturiol Cymru / Natural Resources Wales