Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-276482-X0D4
Eich cyf/Your ref: P/2024/1480

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 20 March 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: ERECTION OF AGRICULTURAL BUILDING

LLEOLIAD/LOCATION: NORTHFIELDS, BANGOR ON DEE, WREXHAM, LL13 0AB

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) with additional information about the above, which we received on 12 March 2025.

We have no objection to the proposed development as submitted and provide the following advice.

Flood risk

The planning application proposes less vulnerable development (agricultural building for storage). Our Flood Risk Map confirms the site to be within Zone C2 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning (FMfP) identifies the application site to be at risk of flooding and falls into Flood Zones 2 and 3 (Rivers) and a Recorded Flood Extent.

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, we refer you to the tests set out in section 6.2 of TAN15. If you consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for the applicant to demonstrate, through the submission of a Flood Consequences Assessment (FCA), that the potential consequences of flooding can be managed to an acceptable level.

We note the submission of a Flood Consequences Assessment by Cadarn Consulting Engineers, Ref: 40524W-CCE-VI-XX-60:30:29-C-80-001, dated March 2025.

The FCA has not utilized the BangorOnDee_5_V1.0_2012 Hydraulic Modelling Study, which includes the Dungrey Brook, and was completed in 2012. An update was carried out in 2021 to apply the latest climate change allowances for the 0.1% AEP and 1% AEP undefended and defended scenarios, in order to update the national Flood Map for Planning (FMfP).

These outputs could be sourced and used to determine potential depths of flooding and assess whether the risks are acceptable and manageable. Consequently, we cannot definitively advise whether the proposed development will be flood resilient during an extreme flood event.

However, the FCA has demonstrated awareness of the flood risk posed to the site. Given the scale and nature of the proposed development we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks and advised to install flood-proofing measures as part of the development.

Therefore, assuming that your authority considers that the development is justified, we would not raise any further concerns. To ensure long-term resilience, we would advise the applicant that the more detailed flood levels (based on the modelling studies referenced above) should be thoroughly reviewed to address insurance-related matters and to secure any vulnerable or valuable contents.

In areas at risk of flooding, we recommend that consideration be given to the incorporation of flood resistance/resilience measures into the design and construction of the development.

We refer the applicant to our website for further advice and guidance. Additional guidance including the leaflet "Prepare your Property for flooding" can be found here.

The developer can also access advice and information on protection from flooding from the ODPM publication 'Preparing for Floods: Interim Guidance for Improving the Flood Resistance of Domestic and Small Business Properties', here.

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, we recommend you consider consulting other professional advisors on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on or grant the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

Protected Sites – Foul drainage

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). In line with our *Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation* (28 June 2024), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments.

However, the application as submitted (agricultural storage building) is unlikely to increase the amount of nutrients entering the catchment. Therefore, we are satisfied that the proposal is not likely to have a significant effect on the River Dee and Bala Lake SAC.

Please note, any manure produced must be managed (storage and application to land) in line with The Code of Good Agricultural Practice (CoGAP) for the Protection of Water, Soil and Air for Wales. If manure is managed correctly then the application as submitted is unlikely to increase the amount of nutrients entering the catchment. Therefore, we are

satisfied that the proposal is not likely to have a significant effect on the River Dee and Bala Lake SAC.

Protected Species

We note that there is no information about protected species with the application and, therefore, are assuming that your Authority has screened the application and concluded that there is not a reasonable likelihood of protected species being present.

Other Matters

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.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our website for further details.

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

Yn gywir / Yours faithfully,

Sara Thomas
Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: northplanning@cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.