

Ein cyf/Our ref: CAS-254470-T0T6
Eich cyf/Your ref P/2024/0252

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 07 May 2024

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Codi stand newydd i wylwyr, tyllau ymochel, grisiau a llawr caled / Erection of new spectator stand, dugouts, stairs and hardstanding

LLEOLIAD/LOCATION: Recreation Ground, Plas Kynaston Lane, Cefn Mawr, Wrexham, LL14 3AS

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 23 April 2024.

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

Flood Risk

The planning application proposes less vulnerable development (the erection of new spectator stand, dugouts, stairs and hardstanding at an existing recreation ground). Our Flood Risk Map confirms the site to be partially 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 partially into Flood Zone 2 (Rivers).

Given the scale and nature of the proposed development within Flood Zone 2, which includes the dugouts and part extension of the football pitch only as part of this application (and in the absence of a flood consequences assessment) we consider the proposals could be acceptable, subject to the LPA being satisfied that no ground raising or importation or storage of material would occur within Flood Zone 2, and the developer being made aware of the potential flood risks and advised to install flood-proofing measures as part of the development.

In addition, the LPA should satisfy themselves that the proposals would not lead to intensification in the use of the recreation ground. If the LPA consider that the proposal would lead to an intensification, we advise that detailed consideration of flood risk would be required and we would wish to be reconsulted.

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. These could include flood barriers on ground floor doors, windows and access points, and implementation of suitable flood proofing measures to the internal fabric of the ground floor.

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](#).

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). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. In line with our [Planning Advice](#) (August 2023), under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments.

However, the application as submitted, i.e. with no toilet facilities proposed, is unlikely to increase the amount of phosphorus 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.

Historic Landfill

The proposal site is located approximately 40m from a historic landfill site. The Environment Agency provided the Local Authority with Historic Landfill data in 2007. You may wish to consult with your Authority’s Environmental Health department with regard to this aspect.

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

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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.