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Ffôn/Phone: 03000 65 3786

10/03/2023

Dear Sarah Hill,

BWRIAD / PROPOSAL: Newid defnydd adeilad o ddosbarth d1 (canolfan feddygol) i ddosbarth c3 (annedd) / change of use of building from class d1 (medical centre) to class c3 (dwelling)

LLEOLIAD / LOCATION: Chapel House Surgery, High Street, Bangor on Dee, Wrexham, LL13 0BU

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the further foul drainage information concerning the above, which we received on 2nd February 2023.

We continue to have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, further consideration is required regarding foul drainage. Further details are provided below.

Protected Sites

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](#) (July 2022), under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments. We therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

This application for converting the medical centre to a dwelling proposes connection of foul water to the mains sewer. The information set out in the section titled 'What does this mean for development proposals involving connection to public wastewater treatment works' has been submitted with the application. The applicant has provided foul drainage comparison calculations for the existing and proposed use. The information has deemed that there would be a minimal increase to the volume of foul water discharging from the site as a result of the proposal.

Your Authority will need to take the above into account in your determination of whether the development is likely to have a significant effect on the SAC. Should you determine that an Appropriate Assessment is required, the Applicant will then need to submit whatever evidence they deem appropriate (seeking advice from consultants as may be necessary) to demonstrate no adverse effect on site integrity. You should then consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine.

Flood Risk

The planning application proposes highly vulnerable development (dwelling). However, we acknowledge that the site already benefits a highly vulnerable use (medical centre). If this is not the case, please re-consult us

Our Flood Risk Map confirms the site to be within Zone C1 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.

Given the scale and/or nature of the proposed development (and in the absence of a flood consequences assessment (FCA)) 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. The applicant may wish to undertake a FCA for their own benefit in order to explore suitable options for incorporating flood resistance and/or resilience measures into the design and to develop a flood plan for the occupants

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, implementation of suitable flood proofing measures to the internal fabric of the ground floor and locating electrical sockets/components at a higher level above possible flood levels.

We refer the applicant to our [website](#) for further advice and guidance is available. 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', can be found [here](#)

If you have concerns regarding matters that we cannot advise you on, such as emergency plans, procedures and measures to address structural damage that may result from flooding, you should consider consulting other professional advisors on the acceptability of the developer's proposals.

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

Gareth Thomas

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