



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-181530-N3V9
Eich cyf/Your ref: P/2022/0121

Maes Y Ffynnon,
Penrhosgarnedd,
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Gwynedd
LL572DW

Wrexham County Borough
Council, The Guildhall,
Wrexham,
LL11 1AY

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

28/02/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: Estyniad ir is-orsaf bresennol ac ystafell y generadur syn gwasanaethu'r bloc EMS / Extension of existing sub-station and generator room serving the EMS block

LLEOLIAD / LOCATION: Wrexham Maelor Hospital, Croesnewydd Road, Wrexham, LL13 7TD

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 8th February 2022.

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

Flood Risk

Our Flood Risk Map confirms the application site lies within zone A of the Development Advice Maps (DAM) as contained in TAN15 however the new FMfP identifies the application site to be at risk of flooding and falls into Flood Zone 2 Rivers.

Given the proposal is for an extension to an existing commercial use (and in the absence of a flood consequences assessment) 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.

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.

The Gwenfro hydraulic model was commissioned by Wrexham CBC and so the flood map outputs are representative of the risk, the FMfP including climate change on the 0.1% event and it seems that the risk is posed by backing up from the old railway culvert and resultant overland flow. We recommend a raised slab level and ensuring vulnerable Mechanical and Electrical equipment is raised should be a design consideration. We would expect that current building standards would expect generators etc. to consider all risks.

We refer the applicant to our [website](#) for further advice and guidance 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](#)

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. As part of this package, we issued a [Planning Position Statement, in which](#) we advised that any proposed development that might increase the amount of phosphate (or phosphorus) within a river SAC catchment could lead to damaging effects to the SAC. Therefore, such proposals should be screened through a Habitats Regulations Assessment (HRA), to determine whether they are likely to have a significant effect on the SAC.

However, the application as submitted 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.

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

