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Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

16/03/2022

Dear Mr Greenland,

BWRIAD / PROPOSAL: Amrywio amodau 2 and 3 caniatad cynllunio p/2020/0021 i diwygio cynlluniau cymeradwy / Variation of condition 2 and 3 of planning permission P/2020/0021 to amend approved plans

LLEOLIAD / LOCATION: Recreation Ground, South of Maybury Avenue, The Cross, Glyn Ceiriog, Wrexham, LL20 7EY

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 1st March 2022.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome if the document identified below is included in the approved plans and documents condition on the decision notice:

- **Flood Risk Assessment, Youth Timber Pavilion, Maybury Avenue, Glyn Ceiriog. Tegid Davies (submitted in support of permission P/2020/0021, 23/03/2021)**

Please note, without the inclusion of this document we would object to this planning application. Further details are provided below.

Flood Risk

The planning application proposes less vulnerable development, the erection of timber pavilion for youth provision. Our Flood Risk Map confirms the site to be within Zone C2 of the Development Advice Map (DAM) contained in TAN15. The site also lies within Flood Zone 3 (Rivers) of the Flood Map for Planning (FMfP)

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 an FCA that the potential consequences of flooding can be managed to an acceptable level.

The FCA (Flood Risk Assessment, Youth Timber Pavilion, Maybury Avenue, Glyn Ceiriog. Tegid Davies, submitted in support of permission P/2020/0021, 23/03/2021) shows that the risks and consequences could be managed to an acceptable level, provided the position of the Pavilion is raised by 300mm from ground level.

Based on the scale of the proposal, and the contents of the FCA, particularly the proposal to raise the floor level by 300mm, we raise no objection to the proposal, subject to the FCA being included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

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.

Advice for the Developer

Works near Watercourse / Construction or Demolition sites:

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 in, near or over watercourses' 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 developer can 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', which can be found at the following link:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/11485/2187544.pdf

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