

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

Date: 16th February 2022

Dear Sarah Brett,

PROPOSAL: Demolition of existing modular building and erection of replacement

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

Thank you for consulting us on the above application, which we received on the 1st February 2022.

We have no objection to the application, but have the following comments:

Flood Risk

Our Flood Risk Map confirms the application site lies entirely within Zone C2 of the Development Advice Maps (DAM) as contained in TAN15 and the FMfP identifies the application site to be at risk of flooding and falls into Flood Zone 2/3 Rivers.

Given the scale and nature (reduced footprint) of the proposed development (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. 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 strongly recommend that the replacement unit is elevated and flood-proofed, as above.

There should be no raised ground levels or structures between the unit and the watercourse to ensure that maintenance access is still achievable for the LLFA.

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](#)

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, recognising the specific nature of the application submitted, i.e. replacement unit we are satisfied that it 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 concerning the above, please contact me on the details below.

Yours' faithfully,

Mr. GARETH THOMAS

Cynghorydd Cynllunio Datblygiad / Development Planning Adviser

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Siaradwr Cymraeg / Welsh Speaker

