



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-162622-R5T0
Eich cyf/Your ref: P/2020/0819

Maes Y Ffynnon,
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northplanning@cyfoethnaturiolcymru.gov.uk

18/08/2021

Dear Sir/Madam,

BWRIAD / PROPOSAL: CODI ANNEDD AR WAHAN.

ERECTION OF DETACHED DWELLING.

LLEOLIAD / LOCATION: WYNONA STATION ROAD, ROSSETT, WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales with additional information and ammended plans about the above, which we received on 05/08/2021.

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, you should seek further information from the applicant regarding flood risk. If this information is not provided, we would object to this planning application. Further details are provided below.

Flood Risk

Our Flood Risk Map confirms the application site lies partially within Zone C2 of the Development Advice Map (DAM) contained in TAN15. We note that the property has been reduced in length by some 750mm and slid forward to ensure amenity and garage is outside of the C2 flood risk. Given the location of flood risk shown to be affecting the application site we consider the proposals could be acceptable, however we advise that the FCA should be updated to include an addendum which considers the points raised below and demonstrates that the upper level of the high ground mentioned is not compromised.

The High Ground of interest here is privately maintained. Provided the high ground is not reduced in height at any point as part of the development, this should not be a concern.

The adjacent walls at Roseacre do form part of the NRW maintained defence and must not be compromised.

We advise that any party boundary works should not directly affect the integrity or protection standard of the current flood defence wall.

We note that there is likely to be some ground recontouring etc as part of the groundworks. Therefore, an updated FCA should be provided to include an addendum that clarifies the points raised and demonstrates that the upper level of the high ground is not compromised.

Subject to the updated FCA being acceptable, we would advise that a condition/informative should be secured on the planning permission so that future occupants are aware of the flood defence tie-in.

We also recommend that you consult your internal flood risk advisors with regard to any potential site access/egress issues.

Protected Sites and Foul Drainage

We note the application site is within the catchment of the River Dee and Llyn Tegid 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 Llyn Tegid SAC.

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

Flood Risk Activity Permit

Please advise the Applicant that the Environmental Permitting Regulations (2016) require them to obtain a bespoke Flood Risk Activity Permit for any works or structures located in,

under, over or within 8 metres of the bank top of the River Alyn, a designated “main river”. Further advice and guidance is available on our website at:

<http://www.naturalresources.wales/permits-and-permissions/flood-risk-activities/flood-risk-activity-permits-information/?lang=en>

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 PPG6: ‘Works in, near or over watercourses’ and ‘Working at construction and demolition sites’ which are available on the following website: /

Pollution Prevention

During the construction phase you should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages.

For further guidance please refer to GPP 5, PPG 6 and GPP22 at the following link:
<http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Rhys Jones

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