

03/10/2018

For the attention of Sharon Holman:

Dear Sharon,

TOWN AND COUNTRY PLANNING ACT 1990  
DEDDF CYNLLUNIO GWLAD A THREF 1990

**PROPOSAL:**

**Change Of Use Of Land From Agriculture To A Mixed Use For Agricultural And  
Practice Firing Range In Association With Field And Falcon Gun Shop And  
Gunsmiths**

**LOCATION:**

**Lodge Farm, off Borrass Road, Commonwood, Wrexham**

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 17/09/2018.

NRW does not object to the proposal, however we would provide the following advice.

**Flood Risk**

From the planning application documents, the partial change of use to the land associated with Lodge Farm would not change or increase the vulnerability of the site to flood risks. The proposed rifle range unit/building would look be raised significantly above the ground and removable. We would recommend the applicant is made aware of the current flood risks to part of the site and that these flood risks could increase from the impacts of climate change.

We note the bunding proposed to the top North West corner of the site is shown to be located over 40 metres from Daisy lane Drain. We would advise that if this bunding was within 10 metres of the drain/main river these works would require a flood risk activity permit from Natural Resources Wales. The likelihood of gaining permission will depend on the potential impacts on flood risk and any maintenance or access requirements for flood risk management.

Further information on the requirements for flood risk activity permits can be found on our website <https://naturalresources.wales/permits-and-permissions/flood-risk-activities/guidance/?lang=en>

## 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.

## Foul Drainage

We note that the planning application form indicates that foul drainage is not applicable in relation to the development. We refer you to WG Circular 008/2018 on private drainage, and specifically paragraphs 2.3-2.5, which stress the first presumption must be to provide a system of foul drainage discharging into a public sewer.

Please consult us again if foul sewage from the proposed development is to be disposed of by a non-mains drainage system.

## Pollution Prevention

Should any pollution occur during the operational phase, Natural Resources Wales should be notified via the incident hotline – 03000 65 3000.

Please do not hesitate to contact us if you require further information or clarification on any of the above.

Our comments above only relate specifically to matters that are included on our checklist “Natural Resources Wales and Planning Consultations” (March 2015) which is published on our website: (<https://naturalresources.wales/planning-and-development/planning-and-development/?lang=en>). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance. The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.

Yn gywir / Yours sincerely,

*Daniel Davies*

Daniel Davies

Cynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales