



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-57370-M7L7
Eich cyf/Your ref: P/2017/0887

Cyfoeth Naturiol Cymru
Natural Resources Wales
Maes y Ffynnon
Penrhosgarnedd
Bangor
Gwynedd
LL57 2DW

Wrexham County Borough Council

Ebost/Email: Northplanning@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: (0300) 065 3787

Date: 22nd March 2018

Dear Sir/Madam,

ERECTION OF STABLE BUILDING, CHANGE OF USE OF AGRICULTURAL LAND TO FORM HORSE MANEGE WITH ASSOCIATE ACCESS TRACK, PARKING AND HARDSTANDING AREA (PARTLY IN RETROSPECT) LITTLE DONGREY FARM, DONGRAY LANE, BANGOR ON DEE

Thank you for referring the above planning application received at our office on the 6th March 2018.

We have significant concerns with the proposed development as submitted. We recommend that you should only grant planning permission if the scheme can meet the following requirement. We would object if the scheme does not meet this requirement.

Requirement – Submission of a revised FCA as specified below, to address deficiencies in the submitted FCA

Flood Risk

NRW consultation response (dated 29/01/2018) and subsequent advice provided by telephone to Weetwood was based on the Weetwood Services FCA final report v1.1 dated January 2018. This recommended a reconfiguration of the site and identified several significant concerns in the FCA in relation (sections 7.2 and Appendix 1 of TAN 15) to:

- the potential flood depths across the site;
- the FFL of the stable and details of the site reprofiling;
- the boundary fencing proposed and impact on flood flow routes; and
- the potential use of the stables as commercial livery/new low vulnerable development use on the farm.

The focus of this response from Natural Resources Wales was fully proportionate to the scale of development and focused on the need to demonstrate compliance with sections 7.2 and Appendix 1 of TAN 15.

The details of a further consultation issued to NRW in the form of a letter and email dated 6th March and a revised FCA from Weetwood Final Report v1.0 dated February 2018 do not address the focus of these concerns. The FCA is considerably shorter and is more focussed on the potential flood plan and flood warning for the site, rather than the concerns raised. There are details within Table 1 of the revised FCA which identify that the potential fluvial flood depths and

velocities for the site, would significantly exceed the thresholds set out in A1.14 and A1.15 and demonstrate a non-compliance with sections 7.2 and Appendix 1 of TAN 15: Development and Flood Risk.

Requirement – Submission of a revised FCA as specified below, to address deficiencies in the submitted FCA

The applicant is required to confirm in writing that the development is ancillary to farm/residential use i.e. not used for commercial livery purposes. Together with the consideration and re-siting of the proposed stable block (in place of the car parking) to the area of the site with potential shallower flood depths, which could be achieved through an amended site plan and the confirmation of limited reprofiling on site and retention of existing hedgerows and/or post and rail fencing to ensure flood flow routes are maintained.

We are also in receipt of additional local information and evidence regarding the site (enclosed within) and recommend that it should be used to update the FCA, and sent to Public Protection and the Lead Local Flood Authority for further advice.

We would strongly recommend the above concerns are considered further, prior to the determination of the planning application.

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.

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

Yn gywir / Yours' faithfully,

Ruth Prichard

Ymgynghorydd Cynllunio Datblygu / Development Planning Advisor

Ebost/Email: Ruth.Prichard@cyfoethnaturiolcymru.gov.uk

Deialu uniongyrchol/Direct dial: (0300) 065 3787 **Siaradwr Cymraeg / Welsh Speaker**



cc: Don Parry-Jones
Lynne King