

Wrexham County Borough Council

Date: 29th March 2018

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

Dear Sir/Madam,

**USE OF LAND AS A CEMETERY
LAND TO THE WEST OF FRIARS COURT, BANGOR-ON-DEE, WREXHAM**

Thank you for referring the above planning application received at our office 15th 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 and you attach the condition listed below. Otherwise, we would object to this planning application.

Requirement: Submission of a Flood Consequence Assessment

Condition: All burials in the cemetery shall be:

- i. a minimum of 50 m from a potable groundwater supply source;
- ii. a minimum of 30 m from a water course or spring;
- iii. a minimum of 10 m distance from field drains;
- iv. no burial into standing water and the base of the grave must be above the local water table;

Flood

The application as submitted, does not address any of the issues identified in the pre-application discussions. No FCA has been submitted and there are no details of any flood defence consents in place for the proposed works. The proposed alterations and use of the track as a vehicular access could significantly harm the integrity of the flood defence embankment and increase flood risk to people and property.

Requirement: Submission of a Flood Consequence Assessment

Pre-planning application advice provided by NRW in 2015-2016 clearly stated that whilst the scale and nature of the proposed development would require a limited FCA. There are a number of potential details for the scheme to be finalised and concerns raised in terms of flood risk and impacts on proposed access and flood defence/embankment structures, future maintenance and liability.

It was also advised that any works proposed which affected the existing track/embankment would require a flood defence consent and would need to clearly demonstrate there were no impacts to the top embankment and maintenance requirements and the proposed works would not preclude any future upgrade and avoid any damage to crest height.

Land Contamination

We note the overall risk scoring as low – due to the low burial rate of 2 burials per year. We therefore request that the following condition be imposed on any planning permission granted for the site.

Condition: All burials in the cemetery shall be:

- i. a minimum of 50 m from a potable groundwater supply source;
- ii. a minimum of 30 m from a water course or spring;
- iii. a minimum of 10 m distance from field drains;
- iv. no burial into standing water and the base of the grave must be above the local water table;

Reason: To protect the quality of controlled waters in the local area.

Protected Species

The application is supported by an ecological submission (reference Roe, R (2017). Land at Friar's Court, Bangor on Dee: Ecological; Survey Report Kingdom Ecology. Unpublished.

The proposal is:

- a. Not likely to be detrimental to the maintenance of the favourable conservation status of any local populations of European protected species; and
- b. Not likely to adversely affect any local populations of British 'fully' protected species.

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: