



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-101559-G6X6
Eich cyf/Your ref: P/2019/0715

Maes y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd,
LL57 2DW

northplanning@cyfoethnaturiolcymru.gov.uk
03000 654099

Wrexham County Borough Council
The Guildhall,
Wrexham
LL11 1AY

20/12/2019

For the attention of Kevin Hughes

Dear Kevin,

**BWRIAD / PROPOSAL: AMENDMENTS TO DESIGN OF CONVERSION AND
EXTENSION PREVIOUSLY GRANTED UNDER CODE NOS.
P/2004/0361 AND P/2013/0801**

**LLEOLIAD / LOCATION: Bridgeman House, High Street, Bangor-On-Dee,
Wrexham (Minor)**

Thank you for re-consulting Natural Resources Wales (NRW) about the above, which was received on 08/11/2019.

We have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if you attach the following condition to the permission. Otherwise, we would object to this planning application.

Condition 1: No development shall commence until a Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan should:

- Build upon the principles outlined in report (Bridgeman House, Bangor on Dee, Bat Activity Survey, Elite Ecology, July 2019)
- Include details of the siting and type of external lighting to be used

- Continued provision for foraging bats within the wider site

The Conservation Plan shall be carried out in accordance with the approved details.

Protected Species

We note that the bat report submitted in support of the above application (Bridgeman House, Bangor on Dee, Bat Activity Survey, Elite Ecology, July 2019) has identified that bats are present at the application site (the report identified bats foraging inside the building). From the information submitted, we consider that the proposed development represents a lower risk for bats, as defined in our guidance document '*Natural Resources Wales Approach to Bats and Planning (2015)*'. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

As this is a lower risk case for bats, we consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Furthermore, we advise that the proposed development is not likely to harm or disturb bats or their breeding sites and resting places at this site, provided the below condition be attached to any planning permission for this scheme to ensure appropriate avoidance and mitigation measures.

Please consult us again if any further information shows that this is no longer a lower risk case.

Condition 1: No development shall commence until a Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan should:

- Build upon the principles outlined in report (Bridgeman House, Bangor on Dee, Bat Activity Survey, Elite Ecology, July 2019)
- Include details of the siting and type of external lighting to be used
- Continued provision for foraging bats within the site

The Conservation Plan shall be carried out in accordance with the approved details.

Flood Risk

On the basis of the advice from the Local Planning Authority, that the existing outbuilding has implemented planning permission P/2004/0361 and P/2013/0801 and therefore benefits from a single unit residential use and this application (LPA reference P/2019/0715) only involves the design/scale alterations and extensions to the existing converted building.

We therefore draw the applicants/owners attention, to the location of the converted outbuilding within an area designated as Development Advice Map (DAM) Zone C1, which is an area at existing fluvial flood risk, but benefiting from flood defences. Pointing out, this proposed development should be supported by a proportionate

flood consequence assessment (FCA), to demonstrate whether it would comply with section 6, 7 and Appendix 1 requirements of TAN 15.

Given the development proposals are limited to extensions and alterations to an existing converted outbuilding including a bedroom on the ground floor, within area which is at significant fluvial flood risks from River Dee and which is unlikely to remain dry over its lifetime. We strongly recommend flood risk resilience and mitigation design measures are incorporated within the scheme. We also strongly recommend; a property flood plan is prepared which makes the occupants aware of the flood risks and sets out a requirement for them to sign up to the flood warning service and regularly prepare/test the flood plan.

There is further information available on flood resilience measures and the flood alert and warning service, on the Natural Resources Wales website <https://naturalresources.wales/flooding/?lang=en>

Flood Defence Embankment

We note that whilst we have been consulted on this planning application (P/2019/0715), the development has proceeded to create a new vehicular access onto the key flood defence embankment, which protects the properties immediately behind and village of Bangor on Dee. This earth embankment is not suitable for vehicular traffic or heavy machinery and any use of this access for this purpose should immediately cease, with the new access from the site/property entirely removed.

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, including environmental interests of local importance.

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:

Pollution Prevention

All works at the site must be carried out in accordance with relevant Guidance for Pollution Prevention (which are available on the following website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

Waste produced during construction

Waste produced during the construction phase of your development must be dealt with appropriately and be in line with all relevant waste legislation including Duty of

Care Regulations and Hazardous Waste Regulations. As part of your waste duty of care you must classify the waste produced:

- before it is collected, disposed of or recovered
- to identify the controls that apply to the movement of the waste
- to complete waste documents and records
- to identify suitably authorised waste management options
- to prevent harm to people and the environment.

Any waste removed from site will be subject to waste management controls. The links below provide information on how to classify waste and register as a waste carrier or hazardous waste producer:

<https://naturalresources.wales/permits-and-permissions/waste/?lang=en>

<https://naturalresources.wales/permits-and-permissions/waste/waste-permits/?lang=en>

Further guidance can be found on the GOV website here:

<https://www.gov.uk/managing-your-waste-an-overview/duty-of-care>

Yn gywir / Yours faithfully,

Daniel Davies

Daniel Davies

Cynghorydd, Cynllunio Datblygu / Advisor, Development Planning

Cyfoeth Naturiol Cymru / Natural Resources Wales