

Head of Environment and Planning
Wrexham County Borough Council
16 Lord Street
WREXHAM
LL11 1LG

10 March 2017

Er sylw / For the attention of: Sharon Holman

Annwyl / Dear Ms Holman

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

BWRIAD / PROPOSAL: Erection of Stables Building and Construction of Menage

LLEOLIAD / LOCATION: Cae Ffynnon, Holt Road, Llan y Pwll, Wrexham

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 16 February 2017.

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 requirements. We would object if the scheme does not meet these requirements.

Requirement: The proposed development should be relocated to a site that lies outside of the floodplain, **Or** the applicant submits a Flood Consequence Assessment which meets the criteria within TAN15 Development and Flood Risk.

Flood Risk

The proposed development lies in Zone C2 as defined by TAN 15 Development & Flood Risk (2004) and shown on Welsh Government's Development Advice Map. This is confirmed by Natural Resources Wales' Floodmap, which shows that the site is at risk of fluvial flooding in the 1% AEP (1 in 100 annual chance) and 0.1% AEP (1 in 1000 annual chance) events. Parts of the site are also shown to be at risk of surface water flooding, as shown on our Flood Map for Surface Water.

The proposal would result in the addition of a new 'less vulnerable' development within the floodplain. The applicant therefore needs to demonstrate, through the submission of a flood consequence assessment (FCA), that the consequences of flooding can be managed over the lifetime of the development. We would object if no FCA is submitted or if the FCA fails to demonstrate that the proposal complies with TAN 15. The criteria for the FCA, which should normally be undertaken by a suitably qualified person carrying an appropriate professional indemnity, are given under Section 7 and Appendix 1 of TAN15.

Given the above, we would strongly advise that in the first instance, the applicant should investigate the possibility of relocating the proposed building to an area of the field which is outside Zone C.

In the event that our significant concerns with respect to flood risk are overcome, the following comments are also relevant:

Pollution Control

Manure should be stored as far away from any watercourse as possible and not within 10m of any watercourse, land drain or spring, or 50m from a borehole. The developers must comply with the "Keeping horses on farm guidelines at the gov.uk website:

<https://www.gov.uk/guidance/keeping-horses-on-farms#horse-manure-and-other-types-of-waste>

Horse manure from commercial stables is classed as commercial waste and cannot be burned. Private horse owners are encouraged to compost manure or use it as a soil improver.

Please don't hesitate to contact me if you require clarification on 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

Meryl Read

Meryl Read

Uwch-gynghorydd Cynllunio Datblygu / Senior Development Planning Advisor
Cyfoeth Naturiol Cymru / Natural Resources Wales