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COUNTY BOROUGH COUNCIL
CYNGOR BWRDEISTREF SIROL
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Eich Cyf/Your Ref: P/2024/1362
Ein Cyf/Our ref: N/A
Dyddiad/Date: 27/09/2024
Gofynner am/Ask for: Cathryn Hughes
Rhif Cyswllt/Contact No: 01978 729639
E-bost/E-mail: flooding@wrexham.gov.uk

Dear Sarah,

Site Address: CADW RHAN O LAWR GWAELOD FEL SIOP A THROSI RHAN O LAWR GWAELOD, A'R LLAWR CYNTAF A'R AIL LAWR I 4 FFLAT / RETENTION OF PART OF GROUND FLOOR AS SHOP AND CONVERSION OF PART GROUND FLOOR, FIRST AND SECOND FLOORS INTO 4 APARTMENTS
Site Description: 36 BROOK STREET, WREXHAM, LL13 7LL

Thank you for consulting the Lead Local Flood Authority (LLFA) Team as the relevant risk management authority in regards to this application. At this time, the LLFA would like to request that a **HOLDING OBJECTION** to this application. This is due to a lack of information surrounding the flood risk posed to the ground floor residential dwelling and the mitigation that this will require.

Flood Risk

The LLFA notes that the proposed development is affected by both pluvial and fluvial flooding. As the nearest watercourse is the River Gwenfro where it remains under the classification of ordinary watercourse, Wrexham County Borough Council are the responsible authority for managing both of these flood risks.

Fluvial Flooding

Fluvial flooding occurs when rivers, stream or brooks exceed their channel capacity. The LLFA note that the proposed development sits within Flood Zone C2 as shown by Figure 1 below.

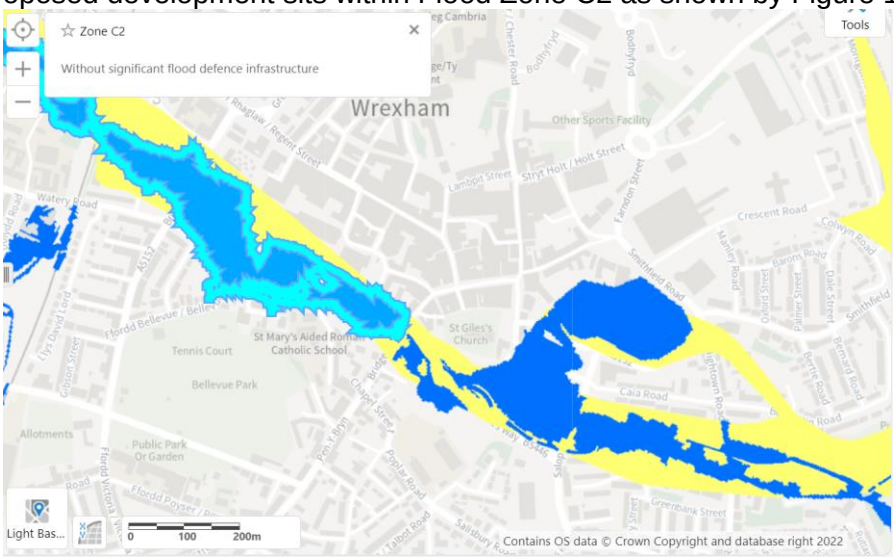


Figure 1: A flood map showing the fluvial flood risk surrounding the proposed development. This image is taken from NRW's development advice maps.

The LLFA also notes that the development is at low flood risk from fluvial flooding from the River Gwenfro. The extent of this flooding is shown in Figure 2. This means that the development is considered to be vulnerable during a 1 in 100 year event.

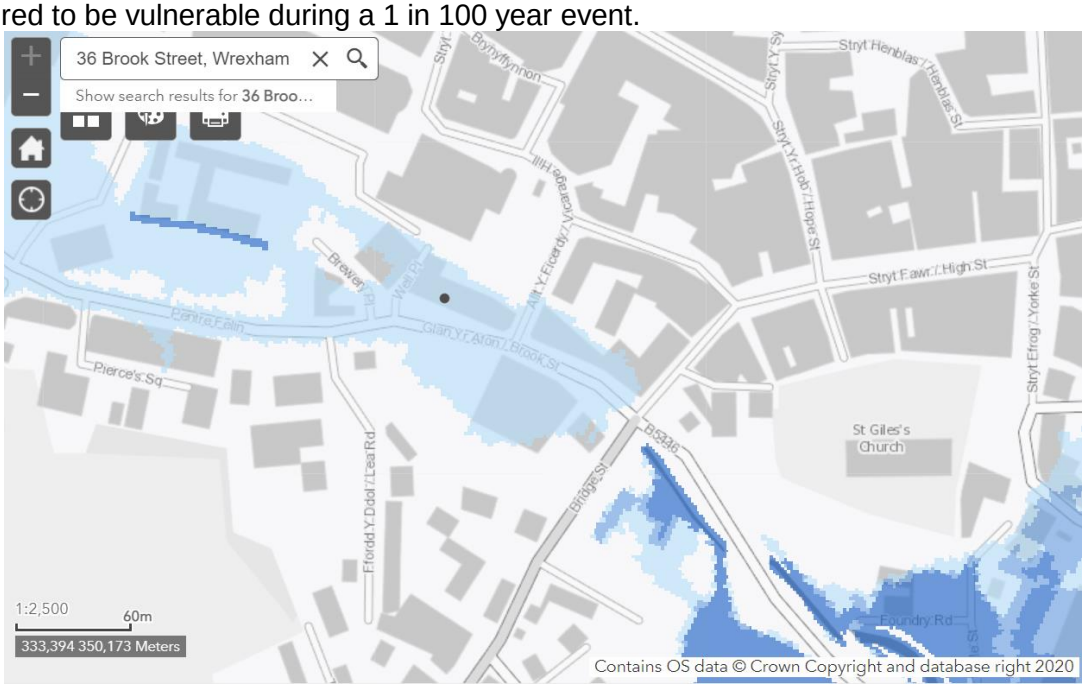


Figure 2: A flood map showing the fluvial flood risk surrounding the proposed development. This image is taken from NRW's flood risk on a map resource.

The LLFA notes that the Flood Risk Assessment (FRA) proposed development would be served by significant flood defence infrastructure. As the responsible authority for flood assets on the ordinary watercourse known as the River Gwenfro, the LLFA authority can confirm that a culvert carries this watercourse under Brook Street. The culvert inlet is approximately 100 m away from the proposed development, but the culvert does not currently have a trash screen preventing debris from entering the culvert. If debris were to build up and cause a blockage within the watercourse, it is likely that the development would flood.

Given the Zone C2 classification of flood risk where this development is proposed, the LLFA have concerns about a ground floor residential dwellings in this development as this would be most at risk during a flood event. As such, we would like to object to the inclusion of this dwelling within the proposal unless full details of flood resilient design can be provided to the LLFA. We would recommend that such a design includes high level plug sockets, using hard flooring materials and using water resilient materials in kitchen fittings. The intention for this is shown in the Flood Risk Assessment, but the details have not been provided for review at this stage. The LLFA would also ask that flood doors or demountable barriers are considered on the external doors to the property. We note that it would be difficult for any future resident of the ground floor flat to move out of the path of flood water and no provision can be provided for moving valuable belongings to a safe location in the event of a flood.

Please note that none of the flood maps presented above illustrates this scenario and so the LLFA would like to see modelling showing the impact of this, including the flood depths within the ground floor residential dwelling.

Pluvial Flooding

Pluvial flooding is the risk posed by surface water. The LLFA Team note that the proposed development is at low risk from pluvial flooding as shown in Figure 3. This means that it is likely to flood from this source in a 1 in 100 year event.

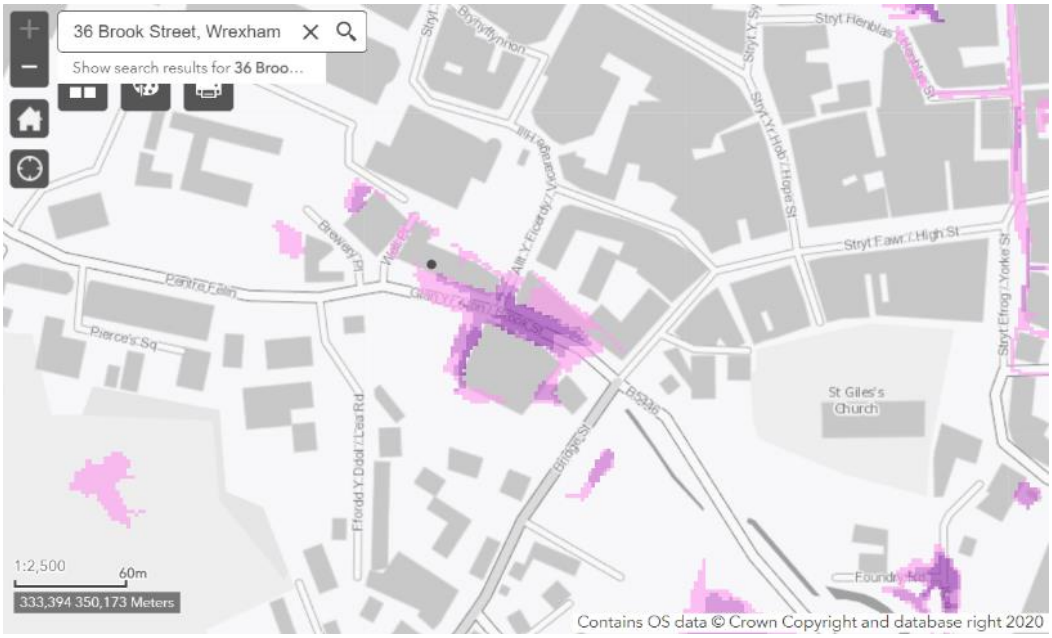


Figure 3: A flood map showing the fluvial flood risk surrounding the proposed development. This image is taken from NRW's flood risk on a map resource.

Tidal Flooding
The Flood Consequence Assessment (FCA) notes that the evacuation route might be within the extent of the tidal flooding area. The River Gwenfro is not a tidal river and would not be affected by such flooding.

TAN 15 Position
We note that under Technical Advice Note 15 (or TAN 15) of Planning Policy Wales that this development falls under previously developed land. However, we do not consider that the consequences of any of the flood scenarios presented above have been appropriately considered. This is mainly due to the inadequate information presented in the Flood Risk Assessment (FRA). This is particularly true of considerations of risk to life and potential damage to property in the ground floor residential flat.

Flood Evacuation Route
The flood evacuation routes are acceptable to the LLFA Team.

SuDS Approving Body (SAB) Approval
The LLFA Team note that the footprint of the existing development is not proposed to change. Therefore, the development would not need to obtain SuDs Approving Body (SAB) approval from the LLLFA Team.

Information Request
In order to resolve the above concerns of the Lead Local Flood Authority in regards to this development, we would like to request that the following information:

1. A full Flood Consequence Assessment (FCA) needs to be submitted to the Lead Local Flood Authority before a full determination can be made on this application.

2. A hydrological model illustrating the depths of flood water affecting the development in a culvert blockage scenario should be submitted as a part of the Flood Consequence Assessment (FCA).

3. The ground floor dwelling is removed from the proposal or a scheme of property resilient design is submitted to the Lead Local Flood Authority for review before determination.

If you have any questions regarding the above, please do not hesitate to contact the team via flooding@wrexham.gov.uk.

Yours sincerely,
Cathryn Hughes
Technical Flood Risk Officer
Lead Local Flood Authority Team

On Behalf of:
Darren Williams, Chief Officer
Environment and Technical Department
Wrexham County Borough Council