



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-63405-G3R8

Eich cyf/Your ref: P/2018/0426

Ebost/Email: northplanning@cyfoethnaturiolcymru.gov.uk

Ffôn/Phone: 03000 65 4099

FAO Matthew Phillips

11/06/2018

Dear Matthew,

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

**BWRIAD / PROPOSAL:
Conversion and change of use to a single dwelling
LLEOLIAD / LOCATION:
Disused Mill, Bradley Mill, Bradley, Wrexham**

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 24/05/2018.

Flood Risk – North Wales Joint Improvement Programme

The planning application proposes highly vulnerable development (housing), which is partially located in Zone C2 of the Development Advice Map (DAM) contained in Technical Advice Note 15 Development and Flood Risk (TAN15). As your Authority is aware, planning policy set out in paragraph 6.2 of TAN15 advises that “highly vulnerable development and emergency services should not be permitted”. A planning decision to permit development would therefore be contrary to planning policy advice.

As agreed as part of the pilot under the Joint Improvement Programme, we would refer you to the agreed standing advice. This Standing Advice explains that your Authority should, in the first instance, make a planning policy decision on the development proposal. Until we receive written confirmation from your Authority that you believe there is sufficient justification to consider granting the application despite its location partially within Zone C2, we have no further comments to make regarding flood risk and we would advise that your Authority should refuse the planning application on planning policy grounds.

The decision as to whether a development is justified is entirely a matter for your Authority; if you consider that the development can be justified, despite its location within Zone C2, we would ask to be re-consulted and granted sufficient time to provide technical advice and comments on the flood risks and consequences. In such circumstances, an up to date flood consequences assessment (FCA) will be required to assess compliance with test iv (in paragraph 6.2).

Please inform us, in accordance with advice in paragraph 11.7 of TAN15, if you are minded to grant permission for the above application contrary to our advice and allow sufficient time for further representations to be made before any consent is granted.

Flood Risk

We note that the site was previously granted planning permission in 2012. Although TAN15: Development and Flood Risk remain the current guidance note, we would advise that since 2012 Welsh Government and Natural Resources Wales have issued further guidance which should be considered in support of the current application. The FCA submitted with this application is the same FCA that was compiled in 2011 and submitted in support of the previous application. Should you inform us that you are minded to grant permission an updated FCA should be produced demonstrating compliance using current guidelines.

The 2011 Flood Consequence Assessment submitted should ensure that the following documents are used in any updated FCA:

- GN008 Flood Estimation Technical guidance – Provides good practice to produce flood estimates to be used in hydraulic modelling

<http://www.naturalresources.wales/media/684119/gn008-flood-estimation-technical-guidance.pdf> . Method of estimating flows has been updated since 2011.

- Climate change allowances were updated in December 2016. It is unclear as to which values were used for CCA's in the 2011 FCA since Appendix B was not included in the FCA. Current WG guidance can be viewed at:

<https://gov.wales/topics/planning/policy/policyclarificationletters/2016/cl-03-16-climate-change-allowances-for-planning-purposes/?lang=en>

- OGN100 advises on Modelling blockage and breach scenarios and was issued in February 2015. It is noted that 2011 study has used a differing blockage proportion.

<http://www.naturalresources.wales/media/684120/ogn100-flood-risk-management-modelling-blockage-and-breach-scenarios.pdf>

- Has the modelling software been updated/improved to that used in 2011?

Protected Species

The original protected species survey was carried out in January 2012. No emergence surveys were carried out. We therefore advise that updated surveys are carried out that accord with published guidelines.

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

Daniel Davies

Daniel Davies

Cynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales