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Ein cyf/Our ref: CAS-20911-T1D9  
Eich cyf/Your ref: P/2016/0648

Llwyn Brain  
Ffordd Penlan  
Parc Menai  
Bangor, LL57 4DE

Ebost/Email: [Gareth.Thomas@cyfoethnaturiolcymru.gov.uk](mailto:Gareth.Thomas@cyfoethnaturiolcymru.gov.uk)  
Ffôn/Phone: (0300) 065 3786

Sharon Holman  
Planning Control Department  
Wrexham County Borough Council  
16 Lord Street  
Wrexham  
LL11 1LG

Date: 18<sup>th</sup> July 2016

Dear Ms Holman,

**OUTLINE APPLICATION FOR RESIDENTIAL DEVELOPMENT (1 NO DWELLING)  
LAND ADJACENT TO NORBRE, WREXHAM ROAD, PENTRE BYCHAN, LL14 4DS**

Thank you for referring us to the above planning application, which was received on the 8<sup>th</sup> July 2016.

The application site lies entirely within Zone C2, as defined by the Welsh Government's Development Advice Map (DAM) as referred to under TAN15 Development & Flood Risk (July 2004). Our Flood Map information, confirms the site to be within the extreme flood risk outline. In the absence of a Flood Consequences Assessment (FCA), we object to this application. If an FCA is not submitted or any subsequent FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then the application should be refused in accordance with the requirements of TAN15.

In accordance with TAN15, the development category is regarded as "highly vulnerable" (see Figure 2). The TAN states that such developments should not be permitted within Zone C". This has recently been re-affirmed by the Welsh Government to all Chief Planning Officers in Wales.

<http://gov.wales/topics/planning/policy/dear-cpo-letters/flood-risk-and-insurance-changes/?lang=en>

If your Authority is minded to approve the application, contrary to TAN15, the Applicant must be required to undertake an FCA prior to the determination of the application. We should then be asked for advice on this assessment in accordance with TAN15. This will ensure that all parties are aware of the risks to, and from, the development, and ensure that if practicable, appropriate conditions to manage the risks can be incorporated in any planning permission,

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. In particular, the FCA will need to assess the potential flood risks to the site, and to the proposed development, from Pentrebychan Brook. The flood risks associated with climate change will also need to be considered over the lifetime of the scheme. In addition, the potential flood risks to the site and development should there be a blockage of the culvert / bridge structure beneath Wrexham Road, should be considered. During blockage flood conditions, it could be possible for

out of bank flows to spill onto Wrexham Road and overland flow routes could affect the proposed development site. This will require assessment within an FCA.

We also recommend that you consult your ecologist in order to determine whether a protected species survey is required to support the application.

The proposal is within or may affect a Landscape of Outstanding/Special Historic Interest. While this is not a statutory designation, chapter 6 of Planning Policy Wales (PPW) states that it is a material consideration in the planning process and must be given due regard when reaching a determination.

Yn gywir / Yours' faithfully,



**Mr. GARETH THOMAS**

**Swyddog Cyswllt Cynllunio / Planning Liaison Officer**

Ebost/Email: [Gareth.Thomas@cyfoethnaturiolcymru.gov.uk](mailto:Gareth.Thomas@cyfoethnaturiolcymru.gov.uk)

Deialu uniongyrchol/Direct dial: (0300) 065 3786 **Siaradwr Cymraeg / Welsh Speaker** 

cc: Blueprint