

Wrexham County Borough Council
Planning Officer
16 Lord Street
Wrexham
LL11 1LG

Date: 19th May 2016

Dear Sir/Madam,

**CHANGE OF USE OF GARAGE AND STORE TO FORM 2 BEDROOM HOLIDAY LET
ACCOMMODATION
BROOK HOUSE THE CADNEY BETTISFIELD WREXHAM**

Thank you for referring the above planning application received at our office 5th March 2016.

Flood Risk

Please note that our response is based on our view that the existing garage is associated with the existing residential building, and that to convert it into holiday accommodation would result in two residential units where there is currently only one. Should your Authority hold a different view, we would ask to be re-consulted.

The submitted flood consequences assessment (FCA) provides inaccurate information on flood zones, muddling definitions of flood zones and probabilities from Natural Resources Wales, Welsh Government's Development Advice Map, and the Environment Agency (section 1.2 and paragraph 3.1.2). Contrary to the information in the FCA, part of the site lies within Zone C2, as defined in TAN 15 Development and Flood Risk (2004) and shown on Welsh Government's Development Advice Map. This is confirmed by Natural Resources Wales' flood zones, which show that the site lies partially within Zone 3 (present-day 1% AEP or 1 in 100 annual chance of flooding) and Zone 2 (present-day 0.1% AEP or 1 in 1000 annual chance of flooding).

Contrary to the statements in paragraph 3.2.2 and 3.4.1 of the FCA, the nearest watercourse to the development flows just to the west of the road on the western boundary of the site (an upper reach of the River Roden), and the flood risk shown to the site is associated with this watercourse, rather than the Shropshire Union Canal. The source of the flood outline depicted in submitted drawing '1 in 1000 year flood routing from Shropshire Union Canal' (J01483-A2-001) is not clear because, despite the annotation indicating it has been taken from Natural Resources Wales' maps, the outline differs substantially from the current NRW outlines at this location. Appendix 2 of the FCA shows NRW Flood Zone 2, on which the Development Advice Map Zone C is based, but not at a suitable scale to show the position of the outline in relation to the existing garage. Our comparison of the indicated position of the existing building on drawing '1 in 1000 year flood routing from Shropshire Union Canal' (J01483-A2-001) with Zone C2 suggests that the flood outline encroaches across the building footprint.

Given the above, it is difficult to accept the statement in paragraph 3.4.2 that the garage is not affected by flooding. The FCA has therefore failed to demonstrate that the interior of the building will remain dry in the 1% AEP event for the lifetime of the development (for highly vulnerable, residential development this is 100 years' climate change), as required by A1.14 of TAN 15. The FCA should suggest flood mitigation measures if appropriate, and should comment on the four thresholds in A1.15 of TAN 15, particularly with regard to safe access and egress.

We have significant concerns with the FCA as submitted. We recommend that planning permission should only be given if the above requirements can be met. If these requirements are not met then we would object to this application.

The applicant should note that we would accept use of surveyed site ground levels at the edge of the 0.1% AEP present-day outline to establish the water level on site during the 1% AEP plus climate change level (the design event). The best available flood information was produced using JFLOW (for which no depth data is available as it is not suitable for use in an FCA), and can be obtained from Natural Resources Wales' Data Distribution team, by contacting datadistribution@naturalresourceswales.gov.uk. Should the applicant/consultant wish to discuss the FCA, they may contact Lucy Stephenson on 0300 0653873 or lucy.stephenson@naturalresourceswales.gov.uk.

Yn gywir / Yours' faithfully,

Ruth Prichard
Swyddog Cyswllt Cynllunio / Planning Liaison Officer
Epost/Email: Ruth.Prichard@cyfoethnaturiolcymru.gov.uk

Deialu uniongyrchol/Direct dial: (0300) 065 3787 **Siaradwr Cymraeg / Welsh Speaker** 

cc: