



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-18458-M1H7
Eich cyf/Your ref: P/2016/0401

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

Date: 7th June 2016

Dear Sir/Madam,

**RESIDENTIAL DEVELOPMENT 16 APARTMENTS 10 NO TWO BEDROOM AND 6 NO ONE BEDROOM
LAND NORTH OF PENTRE BACH, CROESNEWYDD ROAD, WREXHAM, LL13 3BN**

Thank you for referring the above planning application received at our office.

We have the following comments for consideration:

Flood Risks

Parts of the application site lie within Zone C2 as defined in TAN 15 Development & Flood Risk (2004) and shown on Welsh Government's Development Advice Map. This is confirmed by Natural Resources Wales' flood map, which shows that the site is at risk of flooding in the 0.1% AEP (1 in 1000 annual chance) fluvial flood event associated with the River Gwenfro. However, our outline was produced prior to the recent changes to the Croesnewydd Road, and we are aware that the flood risk modelling undertaken to support the nearby Welsh Ambulances Service NHS Trust site (Figure 3.3 of 'FCA for WAST Development at Wrexham Maelor Hospital, Final Report, October 2013', JBA) shows that parts of this application site are also at risk of flooding in the 1% AEP (1 in 100 annual chance) flood event associated with the River Gwenfro. No flood risk information is available for the unnamed tributaries of the River Gwenfro (which converge southwest of the site and then flow eastwards along the southern boundary of the site, meeting the Gwenfro to the north east of the site), as NRW does not generally model catchments smaller than 3km². In addition, Natural Resources Wales' Flood Map for Surface Water shows that some parts of the site are at risk of surface water flooding.

Flood Consequences Assessment

The report uploaded to your website as document 2917833 'PLN Flood Consequence Report – Web' i.e. 'Housing Development, Croesnewydd Road, Wrexham 15223 Flood model Report, April 2016' (Datrys) is not a flood consequences assessment (FCA); it is instead a report on flood risk modelling which has been carried out to determine the flood risks to the site from the two tributaries of the River Gwenfro. This report does not consider the flood risks to the site from the River Gwenfro itself, and it does not consider all other sources of flooding, as required in an FCA.

Natural Resources Wales has had extensive discussions with the applicant's consultant, Datrys, regarding the acceptability of the model (and model report) produced to determine the flood risks associated with the tributaries. While progress has been made, there are a number of

improvements which must be made to this model in order that we can be confident that its outputs adequately reflect the flood risk to the site for the purposes of inclusion in an FCA to support a planning application.

Until a satisfactory FCA is produced which considers all sources of flood risk to and from the site, in line with TAN 15 Development & Flood Risk (2004), we would **object** to the proposed development.

Our letter dated 19th May also remain valid.

Yn gywir / Yours' faithfully,

Ruth Prichard

Swyddog Cyswllt Cynllunio / Planning Liaison Officer

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



cc: