

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

Date: 27th April 2016

Dear Ms Holman,

**OUTLINE APPLICATION TO ERECT 34 DWELLINGS AND CONSTRUCT NEW VEHICULAR
AND PEDESTRIAN ACCESS
LAND SOUTH OF BERSE ROAD, CAEGO, WREXHAM, LL11 6TP**

Thank you for referring the additional information regarding the above application, which was received on the 13th April 2016.

The revised Flood Consequences Assessment (FCA) has not considered the Higher Berse bridge/culvert in the 1% AEP plus climate change event with 100% blockage (the 'design' event). However, we would accept use of the 0.1% AEP with 100% blockage event instead (or 95% to preserve model stability), as the 0.1% AEP flows is clearly higher than the 1% AEP plus climate change flow (as can be seen by comparing Figures 1 and 2 of the FCA) and so the outputs would be conservative.

While the houses would remain dry internally in the 0.1% AEP with 95% blockage event, substantial areas of some of the gardens are at risk of relatively deep and fast-flowing floodwaters (300mm-600mm depth and 0.6-1.2m/s velocity), with a maximum hazard rating of 'Danger to Most'. We would be concerned that because some areas of the gardens still experience flooding in this event, the erection of walls, garages, sheds and other garden structures could divert the flow of floodwaters, potentially leading to internal flooding of properties.

In order to ensure compliance with A1.14 of TAN 15, in addition to finished floor levels being set for the various properties according to Table 1 of the FCA, conditions would be required to ensure open garden fencing, and to remove permitted development rights for those properties whose gardens encroach into the area flooded during the 0.1% AEP with 95% blockage event (property numbers 18, 19, 20, 21, 25, 26 and 27, as per paragraph 6.2 of the FCA).

However, the applicant in this instance could have the opportunity to alleviate flood risk to the entire development, including all garden areas. Both sides of the flow route are well within the site, and so it could well be possible to reprofile the developed area (including the gardens) so that it is entirely outside the flood flow route, while using area on the opposite side of the flow route to maintain a level-for-level flood flow path through the site which will ensure that flood risk is not increased elsewhere. We previously suggested that the site should be redesigned so that flood

flows do not encroach on property curtilages (in the 1% AEP plus climate change with 100% blockage of the Higher Berse bridge culvert). We are disappointed that the option to alleviate flood risk to the whole development has not been investigated. Over the lifetime of the development, this would be the preferred option in terms of protection to the development and its occupiers. In addition, it could have the added benefit of increasing the saleability of the properties because the entire curtilages would be outside the area prone to flooding.

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

Swyddog Cyswllt Cynllunio / Planning Liaison Officer

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cc: Strutt and Parker