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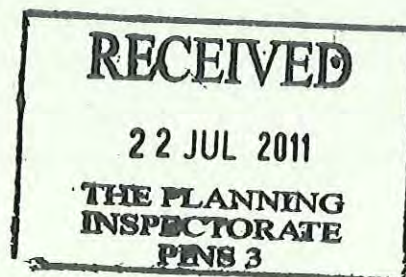
Asiantaeth yr
Amgylchedd Cymru
Environment
Agency Wales

Ms Dawn McGowan
National Assembly for Wales
Crown Building Cathays Park
CARDIFF
CF10 3NQ

Our ref: - NT/2011/112475/01-L01

Your ref:
APP/H6955/A/11/2155088/WF

Date: 18 July 2011



Dear Ms McGowan

**TOWN AND COUNTRY PLANNING ACT 1990
APPEAL BY MR GARY POOLE
4 BROOK STREET, WREXHAM, LL13 7LH**

Thank you for your letter of 11th July 2011 informing us of the appeal to be heard in respect of the above.

The enclosed Flood Consequence Assessment was initially submitted to support an application at the site, P/2010/0909, which involved student accommodation being provided on the ground floor as well as the upper floors. We objected to this proposal and I enclose a copy of our letter to the local planning authority for your information.

The appellant resubmitted the FCA with a second application to Wrexham CBC, P/2010/1052, which is now the subject of this appeal. I also enclose a copy of our advice to the lpa for this second application, where only the upper floors were to be converted to student accommodation. I can confirm that the advice given in these letters in respect of flood risk to the development remains valid.

Yours sincerely

Mrs DEBORAH HEMSWORTH
Planning Liaison Officer

Direct dial 01248 484068

Environment Agency
Llwyn Brain, Ffordd Penlan, Parc Menai, Gwynedd, Bangor, LL57 4DE.
Customer services line: 03708 506 506
www.environment-agency.gov.uk
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Wrexham County Borough Council
Planning Policy
Lambpit Street
Wrexham
LL11 1AR

Our ref: NT/2010/111720/02-L01
Your ref: P/2010/0909

Date: 17 November 2010

Dear Sir/Madam

**CHANGE OF USE AND ALTERATIONS TO FORMER NIGHTCLUB TO PROVIDE
STUDENT ACCOMMODATION ON GROUND AND UPPER FLOORS CENTRAL
BUILDINGS, BROOK STREET, WREXHAM, LL13 7LH**

We refer to our previous response in relation to the above application, dated 11th November. Receipt of further information and advice and review of our records with respect to the culverted River Gwenfro as it passes beneath Wrexham, confirms a history of blockage and flooding, a history of which your local authority will also be aware. As such, and taking the detail of our previous comments to you in our letter dated 11th November into consideration, we **OBJECT** to the proposals as submitted.

In the absence of any information as to the likelihood of blockage or any mitigation in place to minimise/mitigate the risk of failure to the culverted system in the vicinity of this site, we consider that the full consequences of flooding have not been considered. If a blockage occurs from material being washed into the culvert, or the existing culvert collapses, then it would appear that substantial flooding of the site could occur. Therefore, in the absence of any evidence to the contrary we **object** to the change of use from low to high vulnerability proposals at ground floor level in an area of potentially significant flood risk, and recommend that the application is refused.

Should your authority consider approving proposals for residential development and the applicant is unable to provide the additional information required, or such information confirms that the proposals will not meet the criteria within TAN15 for highly vulnerable development, then an alternative proposal for the site may be acceptable. We would have no objection to the change of use to highly vulnerable development at first floor level and above. Should the ground floor and basement remain as low vulnerability development then we would advise that

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mitigation measures in the form of flood proofing could provide betterment to the existing risk. Further information and advice on this aspect may be sought from Mr Neil Taunt, 01244 894570

Yours faithfully

Mrs DEBORAH HEMSWORTH
Planning Liaison Officer

Direct dial 01248 484068

Direct fax 01248 670561

Direct e-mail debbie.hemsworth@environment-agency.gov.uk

cc WEETWOOD ENVIRONMENTAL ENGINEERING

Wrexham County Borough Council
Planning Policy
Lambpit Street
Wrexham
LL11 1AR

Our ref: NT/2011/111913/01-L01
Your ref: P/2010/1052
Date: 12 January 2011

Dear Sir/Madam

**CHANGE OF USE AND ALTERATIONS TO FORMER NIGHTCLUB TO PROVIDE
STUDENT ACCOMMODATION ON FIRST AND SECOND FLOORS AND
CONVERSION OF ROOF SPACE.
CENTRAL BUILDINGS, BROOK STREET, WREXHAM, LL13 7LH**

Thank you for referring the above planning application which was received on 11th January 2011.

The application site lies within zone C2 as defined by the development advice map referred to under TAN15 Development and Flood Risk (July 2004).

A previous application at this site proposed to change the ground floor from a nightclub (low vulnerability) to student accommodation (high vulnerability). We advised refusal of this application. In this case, the proposal retains the nightclub on the ground floor and only the upper floors are to be developed for student accommodation, and therefore the part of the building subject to development will be above the level of any flooding. As there is to be no change to the ground floor, we consider the risk could be acceptable and therefore would not oppose this application. We would, however, advise that the occupants of the upper floors should be made aware that flooding may occur at street level during an extreme event. If possible, should the ground floor be subject to refurbishment etc, we would advise the developer to install flood-proofing measures as part of the development.

The developer can access advice and information on protection from flooding on the following websites:

Environment Agency
Llwyn Brain, Ffordd Penlan, Parc Menai, Gwynedd, Bangor, LL57 4DE.
Customer services line: 08708 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk

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ODPM publication 'Preparing for Floods: Interim Guidance for Improving the Flood Resistance of Domestic and Small Business Properties' on the Planning Portal website: <http://www.planningportal.gov.uk>

<http://www.environment-agency.gov.uk/static/documents/Research/AdvisoryCommentsfz2.pdf>

Yours faithfully

Mrs DEBORAH HEMSWORTH
Planning Liaison Officer

Direct dial 01248 484068

Direct fax 01248 670561

Direct e-mail debbie.hemsworth@environment-agency.gov.uk

cc Cassidy & Ashton