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Wrexham County Borough Council,
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17/10/2019

For the attention of Matthew Phillips

Dear Matthew,

PROPOSAL: RESIDENTIAL DEVELOPMENT COMPRISING CONVERSION OF FIRST AND SECOND FLOORS OF CENTRAL BUILDINGS TO PROVIDE 10 NO. APARTMENTS WITH RELATED ALTERATIONS AT GROUND FLOOR LEVEL AND ERECTION OF 28 NO. APARTMENTS ON ADJACENT LAND WITH ASSOCIATED PARKING

LOCATION: Central Building and Adjoining Brook Street, Wrexham

Thank you for re-consulting Natural Resources Wales (NRW) about the above, which was received on 28/08/2019.

In accordance with TAN15 A3.10, we object to the proposed development as submitted as it has failed to demonstrate that the consequences of flooding can be acceptably managed over the development lifetime. We therefore recommend that the application be refused.

Flood Risk

Our response dated 15th July 2019 set out a detailed set of requirements for an amended Flood consequence assessment (FCA) with regards to A1.14, A1.15 and A1.2 of TAN 15, to demonstrate flood risk can be acceptably managed over the lifetime of the development.

The comments below are provided in response to the submission of a FCA addendum Bridge Street, Wrexham, Weetwood, dated 19th August, Final V1.0, and revised Appendix F (of FCA, Bridge Street, Wrexham, dated 22nd August 2018, Final Report v1.2, and should be read in conjunction with our previous response (15th July 2019).

Matters Relating to Table A1.14

In terms of A1.14 the development is required to demonstrate that it would remain flood free during the 1% culvert blockage with climate change. We note two blockage locations are detailed and the FCA provides the estimate flood level for the 0.1% annual event probability (AEP) for all three locations in the addendum but not the flood levels for the 1% plus climate change at all three locations. The addendum and revised Appendix F (of FCA, Bridge Street, Wrexham, dated 22nd August 2018, Final Report v1.2) show the flood depths in the car park are around 100-200mm and so whilst hazard is low, there is flooding within the red line of the application site. The car parking is associated with the new build development and conversion and would form new highly vulnerable development. The site would not remain entirely dry during the 1% AEP event with an allowance for climate change and therefore fails to satisfy the requirements of A1.14.

In relation to the conversion element of the proposal we note the applicants email confirmation (dated 4th September to the Local Planning Authority) referring to the application form description for conversion of first and second floors only, and confirmation that the only ground floor works would involve a bin store and new entrance with no works proposed at basement level.

Matters Relating to A1.2 – Flood Risk Elsewhere

In terms of A1.2 flood risk elsewhere and changes to profiles of the site, there is a lowering of the site and an increase in flood risk off site in excess of 6mm near the Post Office, Town Hill. We have previously requested clarification on the cause of this and whether this can be attributed to any modelling anomalies. Demonstrating if there were potential offsite impacts of increased flood risk elsewhere.

The addendum however, does not detail what modelling anomalies have been identified (paragraph 20) or why it is not appropriate to raise site levels, what levels of flood risk are expected to occur in the car park in terms of depths and hazards and why this would be considered acceptable. The revised Appendix F of the FCA provides clearer outputs and shows a greater detriment than the earlier version of the FCA, including the following:

- A 5-30mm of detriment to the land immediately North West of the site boundary during the 1% AEP event and a greater extent of flooding detriment for the 1 in 1000 year AEP event for similar depths to a large part of Brook Street, and;
- Flood depths of 150-300mm within the site.

This increase in flood risk elsewhere is clearly contradictory to the requirements of TAN 15.

We draw your attention to the outstanding matters in relation to A1.15 Emergency access and egress. In our letter dated 15th July we specified that it failed the four tests and there was little information about flood hazards. Emergency access from the conversion is likely to be particularly challenging. Hazard details are provided in the addendum FCA and it is suggested the new build development would benefit from a safe access and egress from the south and the existing building's access and egress arrangements would remain the same, but not in terms of context of new conversion scheme of residential development. It is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, we recommend you consider consulting other professional advisors on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users. In conclusion the addendum FCA and revised appendix F of the FCA dated 22nd August 2018 v1.2 confirms the site would not remain dry during the key 1% AEP design event with an allowance for climate change and would result in significant increased flood risk elsewhere up to the 0.1% AEP event. We therefore object to the development as it fails to meet the A1.2 and A1.14 requirements of TAN 15.

Please inform us, in accordance with paragraph 11.7 of TAN15, if you are minded to grant permission for the application contrary to our advice.

Protected Species

Notwithstanding the above, we note that the bat reports submitted in support of the above application (Bat Survey – Preliminary Bat Roost – 4 Brook Street, Wrexham 02 July 2018 and Bat Activity Report – 4 Brook Street, Wrexham 02 October 2018) have identified that bats were not using the application site. We note the precautionary reasonable avoidance measures identified in the Bat Activity Report. The report must be included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

Please do not hesitate to contact us if you require further information or clarification of any of the above.

Our comments above only relate specifically to matters included on our consultation topic list, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other environmental interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

Yn gywir / Yours faithfully,

Daniel Davies

Daniel Davies

Cynghorydd, Cynllunio Datblygu / Advisor, Development Planning

Cyfoeth Naturiol Cymru / Natural Resources Wales