

Cerys Jones

From: Philip Forster
Sent: 17 July 2017 11:21
To: planning_admin
Subject: FW: 2 Brookdale Street, Wrexham - P/2017/0226 NRW:00980517

Consultation response

From: North Planning [mailto:NorthPlanning@cyfoethnaturiolcymru.gov.uk]
Sent: 14 July 2017 09:27
To: Kelly
Cc: Philip Forster
Subject: 2 Brookdale Street, Wrexham - P/2017/0226 NRW:00980517

Mr Kelly,

Thank you for your email below.

The site lies entirely in Zone C2 as defined by Welsh Government's Development Advice Map (DAM) referred to in TAN15: Development & Flood Risk. The TAN states that new "highly vulnerable" development should not be permitted in Zone C2 and this has been reaffirmed by the Welsh Government in their letter to all Chief Planning Officers in Wales (see link below). We would recommend that discussions are held with the Local Planning Authority, as they should advise on the **policy** issues relating the acceptability (or not) of new highly vulnerable development proposed in Zone C2. Our role is to provide technical advice to the determining authority on the level and acceptability of flood risk from rivers and the sea and we will also comment on any mitigation measures proposed.

<http://gov.wales/topics/planning/policy/dear-cpo-letters/flood-risk-and-insurance-changes>

In terms of the Flood Consequences Assessment, NRW will maintain an objection to any new residential development (including a "change of use" application that introduces a highly vulnerable use to an existing property) where it has not been demonstrated that the property will remain **flood free** during the 1% fluvial flood event (including allowance for climate change and blockage of hydraulic structures where relevant). When considering the flood risks to new residential development, NRW considers that the entirety of the property should remain flood free, and it is not simply appropriate to provide a dry "refuge" on the first floor level of the property. This issue has been examined at a planning appeal (APP/T6905/V/13/2203147), where the Planning Inspector concluded such an approach would not be acceptable because it would leave occupants "marooned and quite probably without essential services putting them at risk and placing additional demands on the emergency services at a time when they would already be under considerable pressure".

As previously advised, outputs from the River Gwenfro Model Update Study (2017), could be used as a source of data within the FCA. This information can be obtained from the Local Authority. However, it is probable that flooding depths at the site could be significant, especially when climate change and blockage of culvert(s) is considered during flood events. Therefore it may not be possible for an FCA to demonstrate compliance with A1.14 of TAN15, and in such circumstances, NRW would maintain its objection to the application.

Please do not hesitate to contact us if you wish to discuss further.

Regards

Kind Regards
Angharad Crump

Tîm Cynllunio Datblygu / Development Planning Team
Cyfoeth Naturiol Cymru / Natural Resources Wales
03000 655232
www.cyfoethnaturiol.cymru / www.naturalresources.wales

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy.

Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.



Croesewir gohebiaeth yn y Gymraeg a'r Saesneg / Correspondence welcomed in both Welsh and English.

Ffoniwch ni ar **03000 65 3000** (24-awr) i roi gwybod am ddigwyddiadau amgylcheddol / Call us on **03000 65 3000** (24-hour) to report environmental incidents

From: floodriskglnk@gmail.com [<mailto:floodriskglnk@gmail.com>]

Sent: 11 July 2017 11:56

To: Crump, Angharad <Angharad.Crump@cyfoethnaturiolcymru.gov.uk>; bds.roberts@btinternet.com

Subject: FW: Wrexham Change of Use

Angharad,

Your ref: CAS-32934-Y3F8

Planning Ref: P/2017/0226

2 Brook Street, Wrexham. LL13 7LL

Given this is returning an office to residential in C2 as per your letter, I wanted to cut to the chase.

This is against policy.

We have experience of dealing with this but I wanted to make sure we are on the same page, rather than submitting the FCA and having to play email and ketter tennis.

For this site, would NRW / you ever be able to ever remove objections even if an FCA could demonstrate LOW hazard?

The site is in C2 but that is not helpful / applicable given it is an existing building and this is a change of use – hence the justification test does not apply.

We can ensure no bedrooms on ground floor so all have safe refuge, but is that going to be sufficient?

George Kelly
07954357588
Ark Environmental Consultancy Ltd
www.floodriskassessment.net

From: floodriskglnk@gmail.com
Sent: 11 July 2017 11:45
To: bds.roberts@btinternet.com
Subject: Wrexham Change of Use

We will check:

P/2017/0226

2 Brook Street, Wrexham, LL13 7LL

George Kelly
07954357588
Ark Environmental Consultancy Ltd

