

Philip Forster, Planning Officer
Wrexham County Borough Council
Guildhall
Wrexham
LL11 1AY

Date: 16th August 2017

Dear Mr Forster,

Section 78 Appeal at: LAND WEST OF, BEDWELL ROAD, CROSS LANES, WREXHAM, LL13 0TR
OUTLINE APPLICATION FOR RESIDENTIAL DEVELOPMENT (24 DWELLINGS) INCLUDING MEANS OF ACCESS TO THE SITE

Thank you for notifying us of the above planning appeal, which we received on the 20th July 2017.

You will be aware that our response to the planning application included significant concerns as the application was not supported by a Flood Consequence Assessment (FCA), in accordance with TAN15.

A FCA was submitted in support of the applicant's Appeal against your local planning authority's decision to refuse the application, which was received on 28th July 2017. We have reviewed the FCA and can now confirm that had the assessment been submitted during the planning application consultation stage, our significant concerns would not have been overcome, as the FCA is deficient in terms of compliance with TAN15 criteria and any planning permission should only be granted if the scheme can meet the following requirements. As the application is now in Appeal following your local authority's refusal of the application, our advice to the Planning Inspector is that the Appeal is dismissed as the following requirement has not been met.

Requirement – Submission of a revised FCA as specified below, to address deficiencies in the submitted FCA

Flood Risk

The site lies partially in Zone C2 as defined by Welsh Government's Development Advice Map (DAM) referred to within TAN15: Development & Flood Risk. Our Flood Map information confirms that the site lies partially within the extreme flood risk outline.

Requirement – Submission of a revised FCA as specified below to address deficiencies in the submitted FCA

NRW expressed significant concerns when consulted on the planning application, as a Flood Consequences Assessment (FCA) had not been submitted with the planning application, and we note that this was one of the reasons of refusal for the application. We were advised that a Flood Consequences Assessment (Betts Hydro Consulting Engineers, HYD217_Bedwell.Road_FCA &

DMS. 27 June 2017) had been produced to support the planning appeal. We have now completed a review of the submitted FCA and can advise that we have a number of concerns, and that further assessments are required.

Hydraulic & Hydrological Model

We note that the FCA has referred to outputs from a hydraulic and hydrological modelling study completed on behalf of the Local Authority in 2009. This is the principal source of information used within the FCA to establish the potential fluvial flood risks at the site. A number of years have lapsed since the completion of this study, and NRW would typically expect a review of the hydraulic and hydrological modelling study to be completed as part of the FCA. This is necessary to ensure that outputs from the study remain fit for purpose. There may have been changes in the catchment that have not been represented in the hydraulic model, and in addition, there have been advancements in the calculation of predicted flood flows which may result in different calculations to those used in the study completed in 2009. We would recommend reference to our hydraulic modelling guidance:

<http://naturalresources.wales/media/5568/gpg-101-producing-flood-risk-hydraulic-models-and-flood-consequence-assessments-for-development-planning-purpose-english.pdf>

Impacts of Climate Change

It appears that the original hydraulic and hydrological modelling study from 2009 has considered how climate change could affect peak flood flows. However, we advise that the FCA should use the latest climate change guidance provided by the Welsh Government:

<http://gov.wales/topics/planning/policy/policyclarificationletters/2016/cl-03-16-climate-change-allowances-for-planning-purposes/?lang=en>

The climate change guidance recommends that an assessment of risk is made using the upper end estimate, which for the Dee River Basin District represents a 45% increase in peak flood flows. The information derived from this assessment should be used to inform mitigation measures that help ensure the long-term resilience of the development.

Impacts of Blockage of Hydraulic Structure(s) Adjoining the Site

Lower Bedwell Bridge is located on the northern boundary of the site, and this conveys the Clywedog Stream beneath it. The FCA has failed to consider how a blockage of this structure could affect flood risk to the site, and to the proposed development and users of it. Section A1.6 of TAN15 recognises that the physical landscape can often change under extreme flood conditions. In particular, trees can be uprooted and debris can be swept down watercourses, which can often cause a damming effect of bridge and culvert structures. TAN15 requires developers in their FCAs to consider the possibility of flooding caused by blockage and particular attention given to the flooding consequences of such blockage on the development.

Whilst we recognise that it appears to be the Applicant's intention to steer all development away from the flood risk areas identified within the FCA, we would advise that the issues listed above should be addressed in a revised FCA. This is necessary to ensure that the proposed flood risk mitigation measures are adequately designed to protect the proposed residential development from flooding over its lifetime.

Management of Surface Water Runoff

We would recommend that the Lead Local Flood Authority (Wrexham County Borough Council) are re-consulted, to review the acceptability of the Applicant's proposed surface water drainage strategy. Further advice and guidance relating to this is available on your Local Authority's website at:

http://www.wrexham.gov.uk/english/planning_portal/publications/surface_water.htm

To conclude, although we recognise that the application was refused as a FCA was not submitted, we maintain that we have significant concerns with the proposed development due to the deficiencies in the FCA, submitted in support of the appeal.

If you have any queries concerning the above, please contact me on the details below.

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

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Deialu uniongyrchol/Direct dial: (0300) 065 3786 **Siaradwr Cymraeg / Welsh Speaker**



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