



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-31830
Eich cyf/Your ref: P/2017/0268

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Head of Environment and Planning
Wrexham County Borough Council
16 Lord Street
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18 April 2017

Er sylw / For the attention of: Sharon Holman

Annwyl / Dear Ms Holman

TOWN AND COUNTRY PLANNING ACT 1990
DEDDF CYNLLUNIO GWLAD A THREF 1990

BWRIAD / PROPOSAL: THREE-STOREY 20 (SINGLE BEDROOM) EXTENSION TO
EXISTING HMO WITH ASSOCIATED PARKING
LLEOLIAD / LOCATION: MITRE VAULTS 32 PENTRE FELIN WREXHAM

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 3 April 2017.

We have significant concerns with the proposed development as submitted. We recommend that you should only grant planning permission if the scheme can meet the following requirement. We would object if the scheme does not meet this requirement.

Requirement: Submission of a revised Flood Consequence Assessment that demonstrates compliance with TAN15 criteria.

Flood Risk

The site lies within Zone C2 as defined in TAN 15 and shown on the Development Advice Map. This is confirmed by Natural Resources Wales' floodmap, which shows that the development is at risk of flooding in the present-day 0.1% AEP (1 in 1000 annual chance) flood events. Section 6 of Tan 15 is clear that highly vulnerable developments should not be permitted in Zone C2 (this was reiterated in the letter to Chief Planning Officers of 9 January 2014). In addition, the site is at risk of surface water flooding, as shown on our Flood Map for Surface Water.

We note that the application is for an extension to an existing House in Multiple Occupation (HMO), however, the proposed extension is substantial. The extension would provide an additional 310m² internal floor area, which is above the maximum for which we could consider a *de minimis* response for a normal householder extension. In addition, the proposal would more than double the number of residential units (adding a further 20 to the existing 14) and therefore would represent a significant intensification of the existing use of the site.

We have reviewed the submitted flood consequences assessment (FCA). Unfortunately the proposed development has not been shown to comply with TAN 15 and until an acceptable revised FCA is produced, we would **object** to the proposal.

Requirement: Submission of a revised Flood Consequence Assessment that demonstrates compliance with TAN15 criteria

Due to a recent planning appeal ruling (Planning Inspectorate Appeal Ref: APP/A6835/A/15/3136858), we would now consider undercroft car parking to be an integral part of the residential development, and therefore the proposal would result in an increase to the vulnerability category of the entire development, to 'highly vulnerable' as defined in Figure 2 of TAN 15. As a result, in order to demonstrate compliance with A1.14 of TAN 15, all parts of the development must be shown to be flood free in the design event (i.e. the 1% AEP plus 100 years' climate change event on the River Gwenfro with a blockage at the Island Green culvert). If land raising is required to achieve compliance with A1.14, then it must also be demonstrated that there will be no increased flood risk elsewhere as part of the development.

The submitted flood consequences assessment (FCA) (Platt White, March 2017) refers to information produced in 2009, which has now been superseded by updated modelling produced for Wrexham County Borough Council in 2016, 'River Gwenfro Model Update' (JBA Consulting, 2016). This work includes modelled water levels, velocities and hazards in the design and extreme events, and assessment of 100% blockage at the Island Green culvert, which may be useful in the production of an updated FCA, and may be made available by Wrexham CBC.

Please do not hesitate to contact me if you require clarification on the above.

Our comments above only relate specifically to matters that are included on our checklist "Natural Resources Wales and Planning Consultations" (March 2015) which is published on our website: (<https://naturalresources.wales/planning-and-development/planning-and-development/?lang=en>). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance. The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.

Yn gywir / Yours sincerely

Meryl Read

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Uwch-gynghorydd Cynllunio Datblygu /Senior Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales