



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref:
Eich cyf/Your ref:

CAS-32934-Y3F8
P/2017/0226

Cyfoeth Naturiol Cymru
Natural Resources Wales
Maes y Ffynnon
Penrhosgarnedd
Bangor
Gwynedd
LL57 2DW

11/05/2017

Ebost/Email: angharad.crump@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000 65 5232

Annwyl / Dear Mr Forster,

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

BWRIAD / PROPOSAL: Conversion to form 1 no. duplex apartment together with reduced taxi office

LLEOLIAD / LOCATION: 2 Brook Street, Wrexham. LL13 7LL

Thank you for consulting Natural Resources Wales about the above, which was received on 28/04/2017.

We have significant concerns with the proposed development as submitted.
We recommend that planning permission should only be given if the following requirements can be met. If these requirements are not met then we would object to this application.

Requirement 1 - A detailed FCA is submitted that demonstrates that the site can be developed in accordance with TAN15 acceptability criteria

Further details regarding our requirements is set out below.

Flood Risk

The site lies entirely 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 within the extreme flood risk outline and the sources of flooding is primarily from the River Gwenfro. In the absence of a Flood Consequences Assessment (FCA), we have significant concerns with the proposed development and object to this application.

We note the application involves the change of use of an existing office building to a duplex apartment with kitchen accommodation at the ground floor and sleeping accommodation at the first floor level. In accordance with TAN15, the development category is regarded as "highly vulnerable". The TAN states that such developments should not be permitted within Zone C2.

If your Authority is minded to approve the application contrary to TAN15, the Applicant must be required to undertake a FCA prior to determination of the application. We should then be asked for advice on this assessment in accordance with TAN15. This will ensure that all parties are aware of the risks to, and from, the development, and ensure that if practicable, appropriate conditions to manage the risks can be incorporated in any planning permission.

Requirement 1 – A detailed FCA is submitted that demonstrates that the site can be developed in accordance with TAN15 acceptability criteria

If an FCA is not submitted or any subsequent FCA fails to demonstrate that the consequences of flooding can acceptably managed over the lifetime of the development, then the application should be refused in accordance with the requirements of TAN15.

Welsh Government have provided guidance on what TAN15 requires for new “highly vulnerable” development (e.g. houses) to be considered acceptable is available on their website (link below). The guidance reiterates that new “highly vulnerable” development should not be permitted in Zone C2. Any FCA will need to demonstrate, as a minimum, that the development complies with TAN15 A1.14 requirements and has been designed to be flood free for the 1% annual probability fluvial event (including allowance for climate change and blockage of culvert structures). Also, and in respect of the residual risk to the development, it should be designed so that over its lifetime (A1.5) in an extreme (1 in 1000 chance) event there would be less than 600mm of water on access roads and within properties, the velocity of any water flowing across the development would be less than 0.3 m/second on access roads and 0.15m/second in properties, and the maximum rate of rise of floodwater would not exceed 0.1m/hour. (see table A1.15).

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

We consider that the FCA will need to assess how climate change will affect flood risk at the site, and also how blockage of the culvert structures (Island Green Culvert and St. Giles Way) could affect risk to the site, and users of it. Outputs from the River Gwenfro Model Update Study, could be used as a source of data within the FCA and these can be obtained via the Local Authority. It is possible that flooding depths at the site could be significant, especially when climate change and blockage of culvert(s) is considered during flood events. It may therefore be difficult for an FCA to demonstrate that the consequences of flooding can be satisfactorily managed in accordance with TAN15, over its lifetime.

We thank you for consulting Natural Resources Wales. Please do not hesitate to contact us if you require further information or clarification on any of 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

Angharad Wyn Crump MRTPI
Uwch Swyddog Cadwraeth / Senior Conservation Officer
Gwasanaeth Cynghori Cynllunio Datblygu /
Development Planning Advisory Service