



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-28355
Eich cyf/Your ref: P/2016/0401

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Head of Environment and Planning
Wrexham County Borough Council
16 Lord Street
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26 January 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: Residential development (16 apartments – 10 no two bedroom and 6 no one bedroom)

LLEOLIAD / LOCATION: Land North of Pentre Back, Croesnewydd Road, Wrexham

Thank you for consulting Natural Resources Wales (NRW) on the Flood Consequence Assessment (FCA) associated with the above proposal, which was received on 16 January 2017.

We recommend that you should only grant planning permission if you attach the following condition. This condition would address it to the planning permission.

CONDITION: The development must be carried out in accordance with the FCA (JBA Consulting, January 2017). In particular - finished floor levels must be set no lower than 93.05mAOD and a shallow swale should be constructed.

The site lies partially in Zone C2 and partially in Zone B as defined in TAN 15 Development & Flood Risk (2004) and shown on Welsh Government's Development Advice Map (DAM). Natural Resources Wales' Floodmap also shows that the site is at risk of fluvial flooding in the present-day 0.1% AEP (1 in 1000 annual chance) flood event. However, updated flood modelling carried out on behalf of Wrexham County Borough Council (River Gwenfro Model Update, December 2016, JBA Consulting), shows that the site is not at risk of flooding in the 1% AEP or 0.1% AEP events. As such, we will be updating the Floodmap to reflect the outputs of this study, and in due course this will be reflected in the DAM map, which will then show the site outside Zone C2 (while remaining partially in Zone B). Small portions of the site remain at risk of surface water flooding, as shown on our Flood Map for Surface Water.

The FCA has considered blockage at the key risk locations for the site, and has demonstrated that the site would not be at risk of flooding in the design event with climate change due to complete blockage on the Gwenfro (beneath Croesnewydd Road) or blockage of the tributary of the Gwenfro (beneath Croesnewydd Road, adjacent to Pendinas Road). In the present-day extreme event (0.1% AEP) there would be some flooding to the site in the event of blockage at the tributary culvert beneath Croesnewydd Road, with maximum flood levels at 92.9mAOD. In view of this, we welcome the proposal in the FCA that finished floor levels (FFLs) be raised from the currently proposed 92.45-93mAOD to 93.05mAOD and that floodwater in the extreme blockage event could be rerouted through the site via a shallow swale (paragraph 4.4.2). We note that neither this FFL nor the swale are shown on the submitted drawings, and because the revised FFL is 300mm above existing ground levels, if any localised ground raising in the vicinity of the buildings is required then it will be important to ensure that the flow route into the swale is not compromised.

We have no objection to the proposed development, subject to the inclusion of the following condition:

CONDITION: The development permitted by this planning permission shall be carried out in accordance with the approved Flood Consequences Assessment (FCA) (JBA Consulting, January 2017) and must include the following mitigation measures detailed within the FCA:

1. Finished floor levels are set no lower than 93.05mAOD.
2. A shallow swale shall be constructed to route any flood water which reaches the site via Croesnewydd Road (resulting from a blockage of a culvert of the tributary to the River Gwenfro) away from the buildings and into the River Gwenfro.

REASON:

To reduce flood risk to the development.

The mitigation measures shall be fully implemented prior to occupation.

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