

Matthew Phillips
Planning Control Department
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Date: 4th December 2015

Dear Mr Phillips,

**ALTERATIONS TO CAR PARK AND PUBLIC REALM AND ERECTION OF DRIVE THROUGH RESTAURANT WITH PARKING, SERVICING AND LANDSCAPING (APPLICATION 2 AS REFERRED TO IN SUPPORTING DOCUMENTS)
ISLAND GREEN RETAIL PARK, WREXHAM, LL13 7LW**

Thank you for referring us to the revised information relating to the above planning application, which we received on 16 November 2015.

We **maintain our flood risk objection** for the following reasons:

Flood Risk

The application site lies partially in Zone C2 as defined by Welsh Government's Development Advice Map (DAM) referred to under TAN15: Development & Flood Risk. Our Flood Map information confirms that the site lies partially within the extreme flood risk outline. The proposed drive building now appears to be located on the topographically lowest point of the site, where the flood risks could be considered to be greatest.

We have reviewed the latest Flood Consequences Assessment (Waterman Infrastructure & Environment Limited, EED15092-FRA-rev2, November 2015). Unfortunately, the FCA has failed to address the concerns expressed in our previous consultation response. In particular, we are concerned that the FCA has failed to recognise that the proposed "drive through restaurant" site provides an important route for overland flood flow routes to re-enter the Afon Gwefro. We are concerned that the FCA has failed to sufficiently consider the potential flood risks to the development from this source of flooding. In addition, we are concerned that the proposed development could result in re-contouring of the site, which in turn could affect both the flood routing pathways and flood storage volumes at the site. These have the potential to have an impact of flooding elsewhere. Paragraph A1.2 of TAN15 requires that the FCA should provide a "full appreciation of the consequences of the development on flood risk elsewhere within the catchment for a range of potential flooding scenarios up to that flood having a probability of 0.1%". We do not consider that the FCA has sufficiently considered this.

The Author of the report has primarily used the outputs from Natural Resources Wales' Afon Gwenfro Flood Risk Mapping Study (JBA, February 2009). The report is approaching 7 years in age. We are concerned that there may have been changes to the calculation of hydrology (river flows) and also significant changes to the built environment in Wrexham Town Centre since the report was completed. As such, the outputs from the Afon Gwenfro Flood Risk Mapping Study are likely to be outdated and subsequently may not accurately represent the actual flood risks at this site.

As previously advised, it is our recommendation that an updated computational modelling assessment is undertaken to assess the flood risks to and arising from the proposed development. This should include a review of the hydrology for the Afon Gwenfro and also any require modifications to the hydraulic model to represent key changes to the built environment in Wrexham. The latest position for the drive through restaurant is located on the eastern (lower lying) portion of the site, close to a culvert inlet. Should there be a blockage at this structure, under flood conditions, it is possible that the site and the proposed building could be susceptible to flooding. This has not be considered within the FCA and requires assessment (as set out in Paragraph A1.6 of TAN15).

It is our view that the revised FCA is insufficient and does not provide a suitable assessment to inform decision makers on the flood risks to, and arising from, the development proposals. We therefore maintain our objection to the development, until such time as a revised FCA has been produced to satisfactorily address the above matters.

Proposed Development Layout

The Afon Gwenfro is an Ordinary Watercourse. We would strongly recommend that you consult the Lead Local Flood Authority (Neil Taunt, Wrexham County Borough Council), who may have an interest in the development proposals. They may wish to comment on the proposed development layout and whether the scheme would affect the LLFA's ability to undertake any maintenance and/or improvement works to the river that may be required to manage flood risks in this community.

Other matters

Drainage from any areas used for delivery vehicles, servicing, washdown or waste storage purposes must drain to foul sewer.

NRW is concerned that the activity at this site will lead to suspended solids entering nearby watercourses. Construction work must be carried out in accordance with the NRW's standard conditions for work next to watercourses. No cementitious material must be allowed to discharge into any watercourse. Any water that comes into contact with wet concrete must be treated as contaminated and must not be allowed to drain into any watercourse. Construction work must be carried out in a manner that will minimise the risk of pollution. Should any pollution or discolouration become apparent, work must stop and working practises be reviewed in consultation with NRW. The applicant is advised to follow the guidance within Pollution Prevention Guidance Note 5 "Works and maintenance in or near water".

Please note that we have not considered possible effects on all species and habitats (including nesting birds) listed in section 42 of the Natural Environment and Rural Communities (NERC) Act 2006, or on the Local Biodiversity Action Plan or other local natural heritage interests. To comply

with your Authority's duty under section 40 of the NERC Act, to have regard to conserving biodiversity, your decision should take account of possible adverse effects on such interests.

We recommend that you seek further advice from your Authority's internal ecological adviser and/or nature conservation organisations such as the local Wildlife Trust, RSPB, etc. The Wales Biodiversity Partnership's web site has guidance for assessing proposals that have implications for section 42 habitats and species (www.biodiversitywales.org.uk).

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

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cc: Montagu Evans