



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-12868-F1S4
Eich cyf/Your ref: P/2015 /0862

Llwyn Brain
Ffordd Penlan
Parc Menai
Bangor, LL57 4DE

Ebost/Email: Gareth.Thomas@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: (0300) 065 3786

Janet Sutherberry
Planning Control Department
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Date: 4th December 2015

Dear Ms Sutherberry,

**CHANGE OF USE OF FORMER GROUND FLOOR DOCTORS SURGERY INTO 2 BEDROOM
FLAT
WINIFRED COTTAGE, WHITCHURCH ROAD, BANGOR ON DEE, WREXHAM, LL13 0AY**

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

We object to the application for the following reason:

Flood Risk

The application site lies entirely within Zone C1, as defined by Welsh Government's Development Advice Map (DAM) referred to under TAN15: Development & Flood Risk (July). Our Flood Map information confirms that the site falls within the extreme flood risk outline. In the absence of a Flood Consequences Assessment (FCA) we object to this planning application.

We are aware that the previous planning application at this site was withdrawn (your ref: P/2015/0098) earlier this year, and that the Applicant has re-submitted a new application to create a self-contained apartment on the ground floor. It is our view that the development is likely to result in an increased development "vulnerability" classification of the ground floor (from "less" vulnerable to "highly" vulnerable use (see Figure 2 of TAN15)) and it is our view that the application should be treated as if it were an application for a new residential unit. If your view, as Local Planning Authority is different, i.e. you believe that a "highly vulnerable" use is already established by the former Doctor's surgery use, please advise us, so that we can provide you with the most appropriate flood risk advice.

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

Section 6 of TAN15 requires your Authority to determine whether the development at this location is justified. As part of this justification, the Applicant must undertake and submit a FCA prior to the determination of the application. This will ensure that all parties are aware of the flood risks to and

from the development, and ensure that if practicable, appropriate conditions can be incorporated in a planning approval.

The criteria for the FCA, which should normally be undertaken by a suitably qualified person carrying an appropriate professional indemnity, are given under Section 7 and Appendix 1 of TAN15.

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

Swyddog Cyswllt Cynllunio / Planning Liaison Officer

Ebost/Email: Gareth.Thomas@cyfoethnaturiolcymru.gov.uk

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

