

Hi Chantalle,

I write with reference to the comments from the LLFA.

I am pleased to note that NRW have offered no objection to the proposal on the basis of the FCA submitted:

"As the highly vulnerable element of the scheme is located above ground level, we are satisfied it is elevated from any flood risk. A less vulnerable use is being maintained on the ground floor. As such we do not require a flood consequences assessment (FCA) to advise you on the consequences of flooding to and from the new residential property"

As you are aware TAN 15 indicates that the role of the LLFA authority is to deal with matters relating to:

"The planning authority should also seek advice from the relevant Lead Local Flood Authority on the risk from surface water flooding and other local sources of flooding, including ordinary watercourses."

I would respectfully suggest that some of their comments extend beyond the remit set out in TAN 15.

My reply to their comments are in bold:

The FCA does not identify or assess reservoir flood risk, despite the site being located within a reservoir flood risk area.

Apologies reservoir risk was missed. However this is dealt with by NRW response - new residential element above flood risk.

The site is understood to benefit from existing flood defences, however, these are not referenced or assessed within the FCA.

The site not within a defended flood zone. The edge of the flood defence zone is approximately 100m north east. See attached screen shot.

The submitted plans do not clearly show existing and proposed levels, and no comparison with design flood levels has been provided.

Dealt with by NRW response - no change of use to ground floor - new residential element above flood risk

New drainage has been proposed (permeable paving car park) however no drainage strategy or statement has been provided.

My understand is that a drainage statement is only required when the development footprint exceeds 100 sqm and a SAB application is not

simultaneously submitted. As you will note the proposed car park has an area of 86 sqm. As such my understanding is that a SAB application and drainage statement is not required. Perhaps a condition could address the surfacing and proposed drainage.

No information has been provided on the existing drainage situation. Our assets show a DCWW combined sewer towards the rear of the development.

Not a matter for the LLFA - the drainage section have offered no objection. The application is for a change of use; there are no building works that would affect WW assets either within or off the site. I await comments from WW.

No assessment has been provided on the flood storage lost/gained from the proposed development. The FCA generally lacks sufficient quantitative and site-specific assessment to demonstrate that the development will be safe and will not increase flood risk elsewhere.

Dealt with by NRW comments - The submitted plans and documents clearly show that there are no building works which would reduce on site storage, increase water runoff and there by effect third party flooding.

Many Thanks

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