



**Cyfoeth  
Naturiol  
Cymru**  
**Natural  
Resources  
Wales**

Ein cyf/Our ref: CAS-27043-V6T3  
Eich cyf/Your ref: Hearing Session 4

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Tracey Smith,  
LDP Programme Officer,  
LDP Programme Office,  
Room 12, The Gwalia,  
Llandrindod Wells,  
Powys.  
LD1 6AA

29/03/2017

Dear Ms Smith,

**Representation by Natural Resources Wales  
Hearing Session 4  
Affordable Housing & Gypsy and Travellers**

NRW wish to provide the following additional representation for Hearing Session 4 of the Powys Local Development Plan (LDP) – Affordable Housing & Gypsy and Travellers.

- 5 pitches by 2021 at P42 HA5, Land adjacent cemetery, Newtown Road, Machynlleth

As you're aware, the site currently falls partly within flood zone C2, as set out in TAN15's Development Advice Maps (DAM). We have received a challenge to the flood-map from consultants working on behalf of Powys County Council. We are in agreement with the modelling information submitted in support of the challenge and will therefore revise our floodmap and the DAM to reflect the information in the flood map challenge. This removes the majority of the site from zone C2, but parts of the north and east of the site remain within zone C2 (see attached plan). We aim to make this change to the floodmap / DAM in April's updates.

Section 10.5 of TAN15 states that allocations should only be made in zone C if that allocation is in accordance with section 6. Section 6 is clear that highly-vulnerable developments – such as the proposed allocation – should not be permitted in zone C2. We would therefore request that the allocation boundary, in order to be fully compliant with TAN15 is amended to ensure that it does not include any land within zone C2.

In the meantime we have significant concerns and object to the allocation of this site proposed as a Matters Arising Change by the Authority on flood risk grounds.

We have also been consulted on planning application reference P/2016/1227 which seeks consent to change the use of the above site to form a Gypsy and Traveller Site for 5 families to include erection of 3 buildings to house welfare facility units, improvements to existing vehicular access

shared with cemetery, formation of footway link and internal roadway, installation of a sewage treatment plan and all associated works.

We have reviewed the 'Machynlleth Traveller Site – Flood Consequence Assessment (FCA) WHS dated February 2017' which has been submitted in support of the planning application and attach a copy of our most recent response.

In summary, we have confirmed that the submission in its current form does not fully comply with the requirements of TAN15 and have requested the planning permission is not given until the requirement set out in our letter has been met. The FCA confirms that the site will need be raised in order to ensure it will remain dry in the 0.1% probability event, however unfortunately the FCA has not proposed a level to which the land should be raised. We have advised that for your authority to be able to place a planning condition on any planning consent to ensure compliance with TAN15, it is vital that a level should be proposed. In the absence of a proposed land level, the FCA is incomplete. In the meantime we have significant concerns with the application and object to the approval of the application if our requirements are not met.

- 2 additional pitches by 2026 at P57 HC2 Leighton Arches, Welshpool

We have recently commented on planning application reference P/2016/1240 which proposed an extension to an existing gypsy and traveller site to incorporate two additional pitches, an amenity building and parking together with the relocation of an existing field access' at the above site.

We understand that this application has now been granted planning permission on 22/02/2017.

Our consultation response to the planning application included reviewing the 'Leighton Arches Traveller Site – Flood Consequence Assessment; WSP Revision 2 dated 21<sup>st</sup> December 2016'

The site is currently shown in flood zone C2 as defined by the development advice map referred to under TAN 15 Development and Flood Risk (July 2004). Following our review of the FCA we confirmed that the site is not considered to be at direct risk from fluvial flood risk from the River Severn and have subsequently updated our flood map and the DAM to confirm that the site is not at risk of flooding (see attached updated plan).

As per our recommendation included in our response to the planning application we recommend that your Authority consults other professional advisors on the acceptability of the allocation on matters relating to emergency plans as the FCA confirms that the access route is at risk of fluvial flooding.

We advised that as confirmed by the FCA that flooding of the Leighton Road may occur with reasonable frequency although in most cases flooding is expected to remain shallow and the road remain passable. However, in larger flood events the flooding may exceed TAN15 guidance thresholds and the road may become impassable. If not already in place it is recommended that a flood management plan is developed for the site. It is expected that there would be adequate flood warning time to implement a plan and that the risk to the development is therefore manageable.

We do not approve the adequacy of flood emergency plans and procedures accompanying development proposals as we not carry out these roles during a flood event. Our involvement during a flood event would be limited to delivering flood warning to occupants/users.

NRW therefore confirms that we have no objection to the site being allocated within the Powys LDP as an extension to the existing gypsy and traveller site.

We trust that our comments are of assistance to you. Please do not hesitate to contact us should you wish to discuss our comments further. We can expand further on any of the matters raised above by attending the hearing session should this be of assistance to the Inspector.

Yn gywir / yours faithfully

**Angharad Wyn Crump MRTPI**  
**Uwch-gynghorydd Cynllunio Datblygu / Senior Development Planning Adviser**  
**Gwasanaeth Cynllunio Cynghori Datblygu / Development Planning Advisory Service**