



**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,
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10/03/2017

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.

- 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 21st 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 the NRW flood map to confirm that the site is not at risk of flooding (see attached updated plan).

The DAM maps will be managed by NRW as of the 16th March 2017 and we confirm that the maps on this date will confirm that the site is not at risk of flooding.

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.

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

Part of the application 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).

We are in receipt of a 'floodmap challenge' for the above site (flood map challenge received December 2016). We are currently reviewing an updated version of the hydraulic model to inform the flood map challenge. If the challenge is successful, the majority of the site will move from flood zone C2 to zone A (in which case, the Development Advice Map would likely be updated in July).

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 are currently reviewing the 'Machynlleth Traveller Site – Flood Consequence Assessment (FCA) WHS dated February 2017' which has been submitted in support of the planning application and will provide our final consultation response to the planning application once we have completed our review of the FCA. A site specific flood model has been submitted which informs the FCA and we are currently reviewing bot this and the FCA

We will be able to provide further comments in relation to the suitability of this site as a Gypsy and Traveller Site in the Plan once we have concluded the flood map challenge. In the meantime we have significant concerns and object to the allocation of this site proposed at a Matters Arising Change by the Authority on flood risk grounds.

We trust that our comments are of assistance to you. Please do not hesitate to contact us if we can be of any further assistance to you. 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 Cyngori Datblygu / Development Planning Advisory Service