



Ein cyf/Our ref: CAS-90670-L8W8
Eich cyf/Your ref: Conwy LDP candidate sites

Maes y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd,
LL57 2DW

5th July 2019

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: LDP CANDIDATE SITES SITE SPECIFIC COMMENTS

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales in relation to the replacement Local Development Plan (RLDP) eastern candidate sites, proposed strategic sites and remaining large sites consultation, which we received on 12th June 2019.

Please note that our comments are without prejudice to any comments we may wish to make when consulted on any subsequent consultations as part of the LDP process or any comments that we wish to make on formal planning application submission to develop any of the land identified within the register. At the time of any other consultation there may be new information available which we will need to consider in making a formal response.

Eastern Candidate Sites

Development and Flood Risk

Based on the information presented, we are not able to support 9 of the 10 allocations presented (10, 11, 19, 21, 22, 71, 72, 78, 127) as they are contrary National Planning Policy and A1.14 and A1.15 of TAN 15 Development and Flood Risk.

The remaining site 126 Gofer Rhuddlan Road appears to be flood free for the events considered, however we advise consultation with your Emergency Services Department to ensure that site access and egress for the site in flood events is fully considered in determining inclusion of this site.

Site specific comments and an explanation of the reports reviewed can be found in **Appendix 1** below.

Foul Drainage

Please note the following foul drainage infrastructure capacity issues:

An increase in sewage flow from Abergele would increase the pumping requirements at Pensarn Sewage Pumping Station. This station has had historical problems with its operation and further demand on the system may require significant investment in the equipment. The extra storm flows would also need to be assessed to ensure that coastal storm discharges do not increase beyond existing restrictions. You are advised to discuss this further with Dwr Cymru/Welsh Water.

Proposed Strategic Sites

Land South of Aber Road, Llanfairfechan

Development and Flood Risk

It is understood that part of the site has suffered from surface water/pluvial flooding in the past. We understand that your colleagues in the (now) Environment, Roads and Facilities team carried out works to reduce flood risks on this site in the late 1990's. As such, we would advise that your Authority as the Lead Local Flood Authority will need to consider Surface water flooding in considering inclusion of the site.

Landscape

We have no in principle issue with regards to effects on the setting of Snowdonia National Park. However, a well-considered indicative masterplan for the site would be required to ensure the development fits within its landscape and settlement edge context.

The landscape issues for consideration are:

a) Conserving the setting of Snowdonia National Park.

This is a large site located within open countryside to the south western edge of the town. Whilst not abutting the boundary of Snowdonia National Park, development of the site would be seen from the North Wales Path, bridleway and adjacent areas of open access land at Garreg Fawr within the National Park. There is mature woodland along some sections of the site's south eastern boundary, but there are other open sections where the development edge next to open fields could appear stark and the elevated views over the site would mean the roofscape and density of development would have particular effect on views.

b) Development form and fit

The roof scape of new housing and the school, and denseness of development would be clearly seen from the National Park. The proposed number of houses and large site area has the potentially to appear as an urban extension to Llanfairfechan.

c) Conservation of natural/heritage features of the site

The site contains open grassland, a single mature tree and even contours and gentle landfall across the site. Woodland edges along the site boundary, stone wall and hedgerow boundaries along Aber Road and the mature field tree appear to be the only natural/ landscape elements of the site that need to be accounted for in a future planning layout. Constraints to new development are therefore limited, which gives further concerns that a dense urban form would be forthcoming.

We would recommend that before Draft Deposit Stage you:

- Assess how development density, pattern and building heights can best fit the site within available views (including views from Snowdonia National Park);
- Allow sufficient space in the development for strategic tree planting along boundaries, within public open space and along streets to break up the urban form of the development;
- Plan adequate space for the field tree, root protection zones of woodland trees, place these areas within the public open space network to allow their co-ordinated management and remove conflict with private dwellings and gardens. The planning of SuDs within public open space will further influence the greenspace/ built form layout and planning for biodiversity.

Peulwys Farm, Peulwys Lane, Old Colwyn

We have no comments to make regarding this site.

Land off Bryn Lupus Road, Llanrhos, Llandudno

We have no comments to make regarding this site.

Roundabout field, Abergele

Development and Flood Risk

Part of the site is shown to be within zone C1 of the Development Advice Maps (DAM) contained TAN15: Development and Flood Risk. The flood mapping shown to impact this site allocation is based on historic flooding (1977 rather than the 1990 Towyn event). Therefore, we would advise that if this site is to be taken forward then the flood risks must be fully understood and shown to comply with TAN15 prior to allocation. To fully understand the risks all sources of flooding must be considered along with possible failures of defences and/or blockages to watercourse structure inlets.

Section 10 of TAN15 advises that land allocated within zone C (excluding highly vulnerable development in C2) must be justified in accordance with Section 6 along with ensuring that the consequences of flooding are acceptable and in accordance with Section 7.

Land to the East of the A470, Llanrwst

We have no comments to make regarding this site.

Remaining large sites

Site 30 Former Goods Yard, Builders Street, Llandudno

Development and Flood Risk

The site lies within zone C1 of the DAM maps contained in TAN 15. We recommend your Strategic Flood Consequence Assessment (SFCA) should utilise results from the updated Conwy Tidal Flood Risk Assessment works for the Llandudno Inundation Modelling work by AECOM for this site. Until such time that the report has been published, we cannot confirm if the allocation is suitable and in line with TAN15.

Site 34 Land adjacent Premier Inn, Conway Road, Llandudno Junction

Development and Flood Risk

The site lies within zone C1 of the DAM maps contained in TAN 15. The site will need to be included in any SFCA considering all sources of flood risk. It may be beneficial to consider a report by our predecessors from 2012 (Mochdre Flood Hazard Study) and updated accordingly. The site benefits from flood protection by defences and associated tidal doors in the Conwy Estuary. Consideration will need to be given to overtopping and/or failure of the defences for the extreme sea levels in 2119. Development of this site may compromise access and egress to the west and needs to be considered in your allocation process.

Site 67 Brodnant Farm, Pabo Lane, Llandudno Junction

Development and Flood Risk

Part of the site lies within zone C1 of the DAM maps contained in TAN 15 and also within the Afon Ganol Internal Drainage District which means it is at risk from flooding from tidal inundation, fluvial and groundwater. It is unlikely that the lower elevations of the site can be developed in line with TAN15 but again a SFCA should investigate which proportions of the site could be considered. A report carried out in 2012 (Mochdre Flood Hazard Study) identified that the site was at risk from the climate change scenario in the year 2112 and as such would be at greater risk when using today's projections. We would comment further on this site allocation once a FCA has been produced. Any detriment to third parties would not be acceptable.

Site 92 Land adjoining Quinton Hazell Enterprise Parc, Glan-y-Wern Road, Mochdre, Colwyn Bay

Development and Flood Risk

The site is elevated so our only requirements would be retention of a buffer strip of 8 metres along the watercourse.

Site 113 Land at Tandderwen and off Tan Y Fron Road, Abergele

Development and Flood Risk

Part of this site lies within zone C2 of the DAM maps contained in TAN 15. There is no information to indicate whether this allocation will include Highly Vulnerable Development and it should be noted that paragraph 10.8 of TAN 15 states that "sites in zone C2 should not be allocated for highly vulnerable development in accordance with the advice set out in Paragraph 6.2." It is recommended that the site allocation boundary be amended so as not to include the flood zone within the site boundary. In the event that the boundary remains unchanged and your Authority feels an allocation for non-highly vulnerable development could be considered then a SFCA should investigate fluvial flood risk from the adjacent River Gele. This could be based on an update to previous hydraulic modelling work carried out by our predecessors which was used in support of our flood alleviation scheme. This information can be accessed from our Data Distribution Team datadistribution@cyfoethnaturiolcymru.gov.uk.

Site 114 Land at Siambar Wen, Llanfair Road, Abergele

Comments as outlined for Site 113

Site 149 Land off Llanfair Road (Site 3), Abergele

Comments as outlined for Site 113

Site 158 Land north of Abergele Road, Llanddulas

Development and Flood Risk

A small proportion of this allocation is within zone C2 of the DAM maps contained in Tan 15. There is no information to indicate whether this allocation will include Highly Vulnerable Development and it should be noted that paragraph 10.8 of TAN 15 states that “sites in zone C2 should not be allocated for highly vulnerable development in accordance with the advice set out in Paragraph 6.2.” It is recommended that the site allocation boundary be amended so as not to include the flood zone within the site boundary. In the event that the boundary remains unchanged and your Authority feels an allocation for non-highly vulnerable development could be considered then a SFCA will need to include a hydraulic model of the river Dulas for a range of flood events. There is a history of flooding downstream of the site and any hydraulic modelling should consider not only flood mitigation/compensation for the site but possibly demonstrate a betterment downstream.

Site 35 Land adjacent Mochdre Commerce Parc, Ty Gwyn Road, Dolwyd

Development and Flood Risk

Part of the site is within zone C1 of the DAM maps contained in TAN 15, has a history of flooding and is within the Afon Ganol Internal Drainage District which means it is at risk from flooding from tidal inundation, fluvial and groundwater. The site allocation includes an area of previously agreed flood compensation area for the existing development and should therefore not be compromised. With the current understanding on flood risk to the area it is difficult to consider how any flood mitigation proposals would be acceptable for this site due to the various sources of flood risk. It is suggested your authority reconsider this site allocation. If you are minded to take forward the allocation, additional resources would be required to assess the flood risks via the SFCA. NRW currently oppose the inclusion of this site.

Landscape

We would be happy to review Conwy County Borough Council’s candidate site review methodology to ensure landscape, visual amenity, character, landscape resource conservation, development integration, placemaking and green infrastructure - PPW edition 10 policy, TAN12 and TAN16 areas are factored into your sustainability considerations.

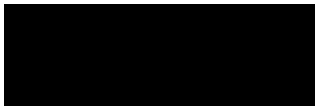
For all strategic large green field sites taken forward to the next stage, we recommend the LPA require a landscape and visual assessment, indicative masterplan, and site planning and design objectives to be provided by the site proposer. The purpose of the assessment is to identify the landscape, character and amenity resource of the site; provide a landscape and visual analysis of the site - where development would be seen and how this might affect existing character to identify the opportunities and constraints to development. How the built form, location of specific elements, the planning of open space, active travel, Suds, strategic planting, colour and materials, control of lighting to dark sky standards etc., positively responds to context, and will all contribute to development character, integration, placemaking, wellbeing of people

and nature. This information could then be used to produce a Site development SPG, to better ensure an allocated site will deliver the LPA's planning requirements.

Please do not hesitate to contact us if you require further information or clarification of any of the above.

Our comments above only relate specifically to matters that are listed in our 'Consultation Topics' document (September 2018) which is published on our website: (<https://cdn.naturalresources.wales/media/686847/dpas-consultation-topics-august-2018-eng.pdf?mode=pad&rnd=131819256840000000>). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance.

Yn gywir / Yours faithfully,



Ruth Prichard
Development Planning Advisor
Planning Advisory Service

Appendix 1

Eastern Candidate Sites

Development and Flood Risk

Please be aware that, although NRW have been party to discussions with your colleagues from Environment Road Facilities and the consulting engineers for your updated Conwy Tidal Flood Risk Assessment, we have not yet reviewed and agreed the content of the submitted document provided (Pensarn to Kinmel Bay TAN15 Requirements. Wallingford Hydro Solutions Ltd. June 2019). We hereby provide comments for the proposed site allocations on the outputs within the report as presented and interpolated flood depths.

We would be grateful for an opportunity to review the modelling work and outputs from it. As such, site-specific comments may change upon any detailed review for each site. The report has considered overtopping and breaches along the coastal frontage and the River Clwyd embankment (as shown on Figure 4 of the report). The report concludes with 10 bullet points which would seem reasonable and in line with the content of the report and the minimum requirements as indicated in TAN15. We would however advise that although ground raising may be a form of flood mitigation, impacts elsewhere will need to be considered and where site allocations are in close proximity/same flood cells, then the cumulative impacts may provide further detriment than raising of individual sites; this would need further modelling/assessment. The final bullet point would seem to be missing the word "improvements" (defence improvements along the coastal frontage and tidal Clwyd will result in significant betterment, making several thousand properties safe from flooding that are currently within the flood extent.)

Our comments also consider two additional studies for the area which consider flood risk from tidal inundation commissioned by NRW. Both reports have limitations since the first is that of the Tidal Clwyd Flood Mapping Update (JBA Consulting. June 2011) which was commissioned to assist in a strategy for the future management and maintenance of the flood embankments along the estuary. This report considered the impacts of climate change and overtopping of the defences but did not consider a breach event on the embankments. The second report is that of the Point of Ayr to Pensarn Tidal Flood Risk Analysis (JBA Consulting, December 2017) which considers breaches along the coastal defences with 2 breach locations being applicable to the study area in the east of the county (being Kinmel Bay breach and Pensarn breach), the study does not consider flooding from the Clwyd estuary.

Site 10 – Gwellyn Avenue, Kinmel Bay

Wallingford Hydro Solutions (WHS) – The site is shown to flood. Flood depths appear to be approximately 0.75m and therefore unacceptable in terms of flood risk. Breach and climate change allowances to 2119.

Tidal Clwyd Flood Mapping Study (2011) (TC) - Overtopping of defences only. Flood depths appear to be between 0.6-1.0m. Overtopping only with climate change up to 2111.

Point of Ayr to Pensarn Tidal Study (2018) (POA) - Part of the site shown to be at flood risk from the coastal breach modelled at Kinmel Bay. Flood depths unknown. Coastal only/no consideration from the Clwyd. Climate change to 2117.

It is noted that the submitted information only makes reference to land raising for this specific site. As such, if this site were to be developed, then wholesale land raising could be used to reduce risks to the development and users of it. However, such engineering operations would be likely to unacceptably increase flood risks to adjacent properties and sites. Further analysis of this would therefore be required. Any increase in off-site risks would lead to NRW objecting to the allocation. The cumulative impacts of raising other site allocations being considered in the area would also need to be assessed.

Site 11- Johnson Woodcraft Site, Cader Avenue, Kinmel Bay

WHS - Site shown to flood. Flood depths appear to be approx. 1.5m and therefore unacceptable in terms of flood risk. Breach and climate change allowances to 2119.

TC - Overtopping only. Flood depths appear to be between 0.6-1.0m. Overtopping only with climate change up to 2111.

PoA - Site shown to be at flood risk from the coastal breach modelled at Kinmel Bay. Flood depths unknown. Coastal only/no consideration from the Clwyd. Climate change to 2117.

Site 19 - Owain Glyndwr, Kinmel Bay

WHS - Site shown to flood. Flood depths appear to be between 0.75m and 1.5m and therefore unacceptable in terms of flood risk. Breach and climate change allowances to 2119.

TC - Overtopping only. Flood depths appear to be between 0.3 and 1.0m. Overtopping only with climate change up to 2111.

PoA - Site shown to be at flood risk from the coastal breach modelled at Kinmel Bay. Flood depths unknown. Coastal only/no consideration from the Clwyd. Climate change to 2092 and 2117

Site 21 - Tileries Estate, Kinmel Bay

WHS - Site shown to flood. Flood depths appear to be 1.5m and therefore unacceptable in terms of flood risk. Breach and climate change allowances to 2119.

TC - Overtopping only. Flood depths appear to be between 0.6 and 1.5m. Overtopping only with climate change up to 2111.

PoA - Site shown to be at flood risk from the coastal breach modelled at Kinmel Bay. Flood depths unknown. Coastal only/no consideration from the Clwyd. Climate change to 2092 and 2117.

Site 22 - Bay Trading Estate, Kinmel Bay

WHS - Site shown to flood. Flood depths appear to be between 0.75m and therefore unacceptable in terms of flood risk. Breach and climate change allowances to 2119.

TC - Overtopping only. Flood depths appear to be between 0 and 0.6m. Overtopping only with climate change up to 2111.

PoA - Site shown to be at flood risk from the coastal breach modelled at Kinmel Bay. Flood depths unknown. Coastal only/no consideration from the Clwyd. Climate change to 2092 and 2117.

Site 71 – Land off Towyn Way West and South of Kinmel Way, Towyn

WHS - Site shown to flood. Flood depths appear to be between 0 and 0.75m and therefore unacceptable in terms of flood risk. Breach and climate change allowances to 2119.

TC - Overtopping only. Flood depths appear to be between 0.3 and 1.0m. Overtopping only with climate change up to 2111.

PoA - Part of the site shown to be at flood risk from the coastal breach modelled at Kinmel Bay. Flood depths unknown. Climate change to 2117. Part of the site also shown to be at risk from a breach in the coastal defences at Pensarn during both the climate change event in 2092 and 2117. Coastal only/no consideration from the Clwyd.

Site 72 - Land at Junction of Towyn Way West and Gors Road, Towyn

WHS - Site shown to flood. Flood depths appear to be between 0 and 0.75m and therefore unacceptable in terms of flood risk. Breach and climate change allowances to 2119.

TC - Overtopping only. Flood depths appear to be between 0.3 and 1.0m. Overtopping only with climate change up to 2111.

PoA - Part of the site shown to be at flood risk from the coastal breach modelled at Kinmel Bay. Flood depths unknown. Climate change to 2117. Part of the site also shown to be at risk from a breach in the coastal defences at Pensarn during both the climate change event in 2092 and 2117. Coastal only/no consideration from the Clwyd.

Site 78 – Former Windjammers Wine Bar, Towyn Road, Belgrano, Abergele

WHS - Site shown to flood. Flood depths appear to be between 0 and 0.75m and therefore unacceptable in terms of flood risk. Breach and climate change allowances to 2119.

TC - Not shown to be at risk from overtopping events from the Clwyd Estuary with climate change up to 2111.

PoA - Not shown to be at flood risk from the breach assessed in Pensarn nor Kinmel Bay up to 2117.

Site 126 – Gofer, Rhuddlan Road

WHS - Site appears to be flood free for events considered. Access/egress to and from the site will need to be considered since it may be beyond the allowable depths suggested in TAN15.

TC - Site appears to be flood free for events considered. Access/egress to and from the site will need to be considered since it may be beyond the allowable depths suggested in TAN15.

PoA - Not shown to be at flood risk from the breach assessed in Pensarn nor Kinmel Bay up to 2117.

Site 127- Clwyd Bank Road, Kinmel Bay

WHS - Site shown to flood. Flood depths appear to be between 1.5 and 2.25m and therefore unacceptable in terms of flood risk. Breach and climate change allowances to 2119.

TC - Overtopping only. Flood depths appear to be between 1.0 to >2.0m. Overtopping only with climate change up to 2111.

PoA - Site shown to be at flood risk from the coastal breach modelled at Kinmel Bay. Flood depths unknown. Coastal only/no consideration from the Clwyd. Climate change to 2092 and 2117.

We would therefore advise that, with the evidence produced to assess flood risk from tidal inundation to the area for each proposed allocation, only site allocation 126 appears to be suitable to consider further - although access and egress to the site may be compromised beyond tolerable depths. Therefore, additional consideration on this aspect of risk would need to be developed and agreed by interested parties.