



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

Ein cyf/Our ref: CAS-20413-W7C0
Eich cyf/Your ref: Hearing Session 11

Llwyn Brain,
Ffordd Penlan,
Parc Menai,
Bangor,
Gwynedd.
LL57 4DE

Ebost/Email:
angharad.crump@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000 655 232

Sharon Ellis,
Programme Officer,
Anglesey and Gwynedd Joint Local
Development Plan,
Swyddfa'r Cyngor,
Stryd y Jel,
Caernarfon,
Gwynedd.
LL55 1Sh

18/08/2016

Dear Miss Ellis,

Representation by Natural Resources Wales
Rep No. 1086 – Griffin Industrial Estate, Penrhyndeudraeth
Hearing Session 11
Allocations and Alternative Sites
Gwynedd – South

NRW wish to provide the following additional representation for Hearing Session 11 of the Gwynedd and Ynys Mon Joint Local Development Plan – Allocations and Alternative Sites Gwynedd – Llyn.

This representation relates to the proposed allocation of land at the Griffin Industrial Estate, Penrhyndeudraeth under Policy CYF1 for employment use.

During our recent meeting with the Planning Policy Officers, we have highlighted our concern with the allocation of the land at Griffin Industrial Estate, Penrhyndeudraeth for employment use, and in particular the area of land centralised around SH61443934.

Historically, the majority of the estate site levels have been increased in order to minimise the flood risk. At the time, part of the proposed allocation was retained at its original levels in order not to increase the flood risk to Penrhyndeudraeth. This area of land is therefore important as a flood storage area and is frequently wet when water levels in Y Cyt are high. Any development on this land would cause significant concern to us.

In the absence of any detailed SFCA, we are of the opinion that any proposal to increase the site levels of this flood storage area would increase the food risk in the area. A decrease in the available storage area for flood water is likely to increase the flood risk to both land and properties in Penrhyndeudraeth - contrary of the objectives of Technical Advice Note 15 (TAN15) which specifies that development should not increase the flood risk to others.

Any development on the flood storage area would be very unlikely to conform to the requirements of TAN15 without the need for land raising. In particular we are of the opinion that it would not be possible for the development to conform to the requirements of paragraph A1.14 which requires new developments to be free from flood in a 1 in 100 year event (1% probability).

As a result of our concerns we are aware that the Local Authority is proposing, subject to it being acceptable by the Inspector, to amend the proposed allocation to exclude the flood storage area from the proposed employment use allocation. We understand that the amended boundary is to be addressed as a potential matter arising change and the necessary changes also made to the site schedule provided under Policy CYF1.

We can confirm that subject to the removal of this area of land, we can confirm that we would not object to the proposed allocation for employment use.

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 during hearing session 11 should this be of assistance to the Inspector.

Yn gywir / yours faithfully

Angharad Wyn Crump MRTPI
Uwch Swyddog Cadwraeth / Senior Casework Officer
Tim Gwaith Achos / Casework Team