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Wales**

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

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18/08/2016

Dear Miss Ellis,

**Representation by Natural Resources Wales  
Rep No. 1086 – Porthmadog Business Park  
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 Porthmadog Business Park under Policy CYF1 for employment use.

We have now had the opportunity to review the Flood Consequence Assessment prepared by Waterco Consultants (dated August 2016) that was forwarded to us by email on the 15<sup>th</sup> August 2016 directly from Gwynedd County Council and have the following comments to make on the proposed allocation.

It is noted that, for most scenarios, the site in question is shown to be flood free in the defended 0.5% probability flood event, accounting for climate change for the next 100 years. However, flooding to the westernmost part of the site is identified as a risk in the event of a breach of the Cob Crwn tidal defence (we are also aware that the modelling identifies a similar risk associated with a potential breach of the Cyt tidal doors, although this has not been included in the FCA).

Although not mentioned in the FCA, it is worth noting that Welsh Government guidance (letter to chief planning officers, dated January 2014) indicates that for commercial developments, climate change should be considered over 75 years – not 100 years as has been represented in the FCA.

Had the FCA considered 75 years of climate change, it is fair to assume that the extent of flooding of the proposed allocation would be subject to less flood risk than is shown in Figure 7 of the FCA.

In view of the above, and given the limited flood risk to the site, we would not oppose the allocation of the site for employment use.

However, as indicated in the FCA, any planning application for development within the allocated site – be they replacements or new build – would need to show compliance with the requirements of TAN15 (A1.14 and A1.15) and therefore need to be accompanied by a site specific Flood Consequences Assessment. As indicated, 75 years of climate change should be considered and, should any areas still be shown at flood risk in that event, appropriate mitigation measures would need to be incorporated into the design.

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**