

**FAO: John Marks**

The Vale of Glamorgan Council  
Development Control  
Docks Office  
Subway Road  
Barry  
CF63 4RT

17 March 2016

Dear Sir/Madam,

**VALE OF GLAMORGAN LOCAL DEVELOPMENT PLAN 2011 – 2026  
PROPOSED GYPSY AND TRAVELLER SITE FLOOD CONSEQUENCE ASSESSMENT  
- AT HAYES ROAD, SULLY**

Further to our letter on 17 December 2015 (referenced CAS-12544-C4C7), an updated flood consequences assessment (FCA) has been produced for the above site to take account of comments we raised.

Based on the findings of the FCA, we consider the proposed MG5 allocation is based on credible and robust evidence. Therefore we are not seeking a change in the plan. In allocating the proposed site your Authority should determine whether the risks and consequences of flooding can be acceptably managed.

The updated FCA has confirmed the following points:

1. In line with the Chief Planning Officer letter from Welsh Government dated 9 January 2014, the FCA has used a lifetime of development of 100 years in its tidal flood risk assessment (section 3.2).

This has not changed the findings of the FCA as the fluvial flood risk is still considered the greatest risk to the site, i.e. the fluvial event remained larger than the tidal event.

2. The FCA has included discussion on Hazard Ratings at the site under section 3.23. These can be summarised as:
  - The entrance of the site should be considered as 'Danger for most – includes general public';

- This decreases within the site toward the edge of the flood extent down to 'Danger for some – includes children, the elderly and the infirm';
- There are no 'Danger for all - including emergency services' hazard ratings on the site or entrance to the site.

Based on the evidence available, mitigation measures have been proposed to ensure any future development on this site can be designed to be in line with A1.14 of TAN15. There is a risk of flooding to the northern edge of the site and access into the site. It is for your Authority to decide whether this risk can be acceptably managed through an Emergency Plan as proposed. Please refer to our letter on 17 December 2015 in this regard.

### **Statement of Common Ground / Position Statement**

As agreed with the Planning Inspector and your Authority, we are able to help you prepare a Statement of Common Ground / Position Statement regarding this allocation, and other site allocations within C1 or C2 of the Development Advice Maps referred to within Technical Advice Note 15.

### **Further Advice**

The site lies on a Principal Aquifer and therefore we consider that controlled waters at this location are sensitive. Contamination in the area is strongly suspected due to previous land uses. Therefore future development on this site could introduce potential pathways to groundwater and mobilise contaminants. This matter will need to be considered at the planning application stage through the submission of a Preliminary Risk Assessment, as a minimum.

If flood risk matters are found to be acceptable; and the site is allocated in the adopted Plan, we consider that text should be included in Appendix 5 to ensure the contamination matters, as well as flood risk matters, are fully understood by the developer and decision maker. We will be happy to review any draft text.

Yours sincerely

**James Davies**  
**Senior Development Planning Advisor / Uwch Ymgynghorydd Cynllunio Datblygu**