

DfI Rivers Planning Advisory Modelling Unit

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Ards and North Down Borough Council
Planning Department
The Council Office
2 Church Street
Newtownards
BT23 4AP

Your Ref: LA06/2020/0097/F
Our Ref: IN1-20-2366

Date: 18 October 2021

FAO Andrea Todd

Dear Madam

Re: Demolition of existing buildings at 5-12 and 35-41 Queen's Parade, 22-30 Main Street (formerly B and M Bargains), 34-36 Main Street (Oxfam and Hospice shops), 6-34 King Street and 5-17 Southwell Road; minor extension and elevational changes to 40-42 Main Street (Caffe Nero); creation of new means of escape and installation of rooflights to 20 Main Street (Halifax); creation of new bin storage and basement access together with minor façade works to 48 Main Street (TK Maxx); erection of a mixed use development comprising culture and leisure facilities (class D), a 67-bedroom hotel, retail units, food and beverage outlets, offices (class B1 (a)), 138 residential units comprising 126 apartments in 3 blocks and 12 duplex apartments along King Street, creation of undercroft car park comprising 217 spaces together with 14 courtyard spaces and 24 on street, minor modifications to the Main Street and King Street junction and creation of a two-way street along Southwell Road from the junction with Primrose Street, creation of new public squares and courtyards including new pedestrian access points; and the redevelopment of Marine Gardens Car Park including partial demolition of sea-wall to create a public realm space comprising gardens and lawns, play areas, events spaces, covered shelters, 4 kiosks and 2 pavilions (housing food and beverage operators), and water feature together with other ancillary development at Lands at and to the rear of 18 to 52 Main Street (Reeds Rain to TK Maxx), 2 to 34 King Street, 5 to 17 Southwell Road, 5 to 41 Queen's Parade, Marine Gardens car park, the Esplanade Gardens and the area around McKee Clock, Bangor, BT20 3BJ.

With reference to your consultation dated 30th September 2021 and letter from RPS, dated 9th August, my comments are as follows:

A review of the information provided in the RPS letter, and a wider review of the inundation model, has resulted in a revision to the inundation model output. However, the proposed site remains partially within an area of inundation emanating from Clandeboye Lake, with the extents limited to the westerly portion of the site south of Queen's Parade and the part of the site north of Queen's Parade.

Subsequently the following advice stands:

FLD5 - Development in Proximity to Reservoirs – DfI Rivers reservoir inundation maps indicate that this site is in an area of inundation emanating from Clandeboye Lake, Ballysallagh Upper Reservoir and Ballysallagh Lower Reservoir.

DfI Rivers is in possession of information confirming that Ballysallagh Upper & Ballysallagh Lower impoundments have 'Responsible Reservoir Manager Status'. Consequently DfI Rivers has no reason to object to the proposal from a reservoir flood risk perspective.

It has not been demonstrated to DfI Rivers that the condition, management and maintenance regime of Clandeboye Lake is appropriate to provide sufficient assurance regarding reservoir safety so as to enable the development to proceed, as required under Policy FLD 5.

DfI Rivers has also carried out an assessment of flood risk to people at this site (based on the Defra / Environment Agency's "Hazard to People Classification using Hazard Rating") for an uncontrolled release of water emanating from Clandeboye Lake should it occur.

As a result of this analysis, the overall hazard rating at this site is considered high. This is therefore considered by DfI Rivers to be an unacceptable combination of depth and velocity for this particular development proposal.

Policy FLD 5 of PPS 15 states that there will be a presumption against any development located in areas where it is indicated that there is the potential for an unacceptable combination of depth and velocity.

Comments in relation to FLD1, 2, 3 and 4 remain as stated in previous correspondence dated 15th December 2020, remain applicable to this site

Please quote our reference number above on any future correspondence.

Eoghan Daly
Planning Advisory Modelling Unit