

Appendix One
Consultation notification.

10th August 2018

Dear Sir/Madam

Re: Land and buildings at Corner of Brook St and Bridge St, Wrexham.

We act on behalf of Lingar Developments Ltd who are intending to submit a planning application for residential development at the above address.

As part of the application process, we are required to consult with adjacent landowners/occupiers.

We have enclosed a notice which provides details of the application, together with a website where the application can be viewed in full.

If you would like to comment on the proposals, then please send your comments to us at the address detailed on the notice by the stated date.

Yours faithfully

M GILBERT

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION.

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2C AND 2D

(to be served on owners and/or occupiers of adjoining land and community consultees; and displayed by site notice on or near the location of the proposed development)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at: Corner of Brook Street and Bridge Street, Wrexham.

I give notice that: Lingar Developments Ltd

Is intending to apply for planning permission for: Proposed residential redevelopment comprising conversion of the first and second floors of Central Buildings to provide ten apartments (with related external alterations at ground floor level), and the construction of thirty-two apartments and associated parking etc on the adjacent vacant land.

You may inspect copies of:

- the proposed application;
- the plans; and
- other supporting documents

online at: <http://centralbuildingsregeneration.co.uk/> and computer facilities are available to view this information online at Wrexham Library, Rhosddu Road, Wrexham LL11 1AU between the hours of 9.30 am to 6.00 pm, Monday to Friday and 9.30 pm to 4.00 pm on Saturdays.

Anyone who wishes to make representations about this proposed development must write to the applicant/agent at: matt@mattplan.com or The Planning Consultancy, Bridge Farm, Sarn, Malpas, Cheshire. SY14 7LN.

by: 12th September 2018.

Signed:



Date: 15th August 2018.

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION.

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2D

(to be served on specialist consultees, as defined by article 2(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012

Purpose of this notice: this notice comprises a formal request for a pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Proposed development at: Corner of Brook Street and Bridge Street, Wrexham.

I give notice that: Lingar Developments Ltd

Are intending to apply for planning permission for: Proposed residential comprising conversion of the first and second floors of Central Buildings to provide ten apartments (with related external alterations at ground floor level), and the construction of thirty-two apartments and associated parking etc on the adjacent vacant land.

A copy of the proposed application, plans; and other supporting documents can be viewed online at:
<http://centralbuildingsregeneration.co.uk/>

In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to The Planning Consultancy at: matt@mattplan.com by 12th September 2018.

Signed:



Date: 15th August 2018.

Appendix Two

Consultation responses.



Dŵr Cymru
Welsh Water

Developer Services
PO Box 3146
Cardiff
CF30 0EH

Tel: +44 (0)800 917 2652
Fax: +44 (0)2920 740472
E.mail: developer.services@dwrcymru.com

Gwasanaethau Datblygu
Blwch Post 3146
Caerdydd
CF30 0EH

Ffôn: +44 (0)800 917 2652
Ffacs: +44 (0)2920 740472
E.bost: developer.services@dwrcymru.com

Mr Matt Gilbert
The Planning Consultancy
Bridge Farm
Malpas
Cheshire
SY14 7LN

Date: 24/08/2018
Our Ref: PPA0003344

Dear Mr Gilbert

Grid Ref: 333370 350118

Site Address: Corner of Brook Street and Bridge Street, Wrexham

Development: Schedule 1C Article 2D - proposed residential comprising conversion of first & 2nd floors of Central Buildings to provide 10 apartments (with related external alterations at ground floor level) and the construction of 32 apartments and associated parking

I refer to the Schedule 1C - Article 2D notice received and your formal request for a pre-application consultation response before applying for planning permission from Dwr Cymru Welsh Water as a 'Specialist Consultee' as defined by Paragraph (y) of Schedule 4 of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. It is acknowledged that the consultation request relates to a major development site and thus seeks a substantive response within 28 days from the date of the notice, 15th August 2018, as per the requirements of Article 2E. This request includes our views on the capacity of our network of assets and infrastructure to accommodate your proposed development.

Having reviewed the details submitted I would offer the following advice which should be taken into account within any future planning application for the development:

ASSET PROTECTION

The proposed development is in close proximity to a 740 x 480mm combined public sewer with the approximate position being marked on the attached Statutory Public Sewer Record. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. No part of any building will be permitted within 4 metres either side of the centreline of the 740 x 480mm combined public sewer.

Our strong recommendation is that your site layout takes into account the location of the assets crossing the site and should be referred to in any master-planning exercises or site layout plans submitted as part of any subsequent planning application. Further information regarding Asset Protection is provided in the attached Advice & Guidance note.



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wed'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

SEWERAGE

The foul flows only from the proposed development can be accommodated within the public sewerage system. We advise that the flows should be taken to the combined sewer downstream of manhole reference SJ33504104 which is located to the north east of the site.

Should a planning application be submitted for this development we will seek to control these points of communication via appropriate planning conditions and therefore recommend that any drainage layout or strategy submitted as part of your application takes this into account.

However, should you wish for an alternative connection point to be considered please provide further information to us in the form of a drainage strategy, preferably in advance of a planning application being submitted.

SURFACE WATER

We note that it is proposed to dispose of surface water via infiltration or the main sewer. Please be advised that no surface water, highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.

ADVISORY

The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water Industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com

Some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect your proposal. In order to assist us in dealing with the proposal we request that you contact our Operations Contact Centre on 0800 085 3968 to establish the location and status of the sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

SEWAGE TREATMENT

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn elldo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at developer.services@dwrcymru.com

Please quote our reference number in all communications and correspondence.

Yours faithfully,



Owain George
Planning Liaison Manager
Developer Services

Encs: Sewer plan

Please Note that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.



FAO Matt Gilbert, The Planning Consultancy

11/09/2018

Dear Mr Gilbert,

Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 Notice Pre-Application Consultation under Article 2D

PROPOSAL: Proposed residential redevelopment comprising conversion of first and second floors of Central Buildings to provide 10 no. apartments (with related external alterations at ground floor level), and the construction of 32 no. apartments and associated parking etc on the adjacent vacant land

LOCATION: Central Buildings and adjacent land, Brook Street and Bridge Street, Wrexham

Thank you for consulting Natural Resources Wales about the above proposed development at pre-application stage.

Please note that our comments are without prejudice to any comments we may wish to make when consulted on any subsequent planning application or permit (either at pre-application or application stage) for the proposed development. At that time, there may be new information available which we will need to take into account in making a formal response.

Based on the information submitted to us, we have significant concerns with the proposed development as submitted. On this basis, we would recommend to the local authority that they should only grant planning permission if the scheme can meet the following requirements. Otherwise, we would object to the planning application.

Requirement 1: Confirmation has been received from the local planning authority that the development should be considered, despite its location within Zone C2 and contrary to Planning Policy

Requirement 2: EPS: Additional information to assess potential effects of the proposal on protected species.

Flood Risk

The planning application proposes highly vulnerable development (residential), which is partially located in Zone C2 of the Development Advice Map (DAM) contained in Technical Advice Note 15 Development and Flood Risk (TAN15). Planning policy set out in paragraph 6.2 of TAN15 advises that "highly vulnerable development and emergency services should not be permitted". A planning decision to permit development would therefore be contrary to planning policy advice.

A Joint Improvement Programme has been established with local planning authorities in North Wales, which is overseen by Natural Resources Wales (NRW) and Planning Officers Society Wales (POSW) with support from the Welsh Government. As part of the project, the approach to proposals for highly vulnerable development and emergency services located in areas of high flood risk hazard is that, the Local Planning Authority should, in the first instance, make a planning policy decision on

the development proposal, as the decision as to whether a development should be considered, contrary to TAN15 Policy, is entirely a matter for the Local Planning Authority.

Requirement 1: Confirmation has been received from the local planning authority that the development should be considered, despite its location within Zone C2 and contrary to Planning Policy

Only when confirmation has been received from the local planning authority that the development should be considered, despite its location within Zone C2, would we provide technical advice and comments on the flood risks and consequences. In such circumstances, we would review any submitted FCA.

It should also be noted that under the Town & Country Planning (Notification) (Wales) Direction 2012, where a local planning authority is minded to grant permission, there is a requirement to refer applications for emergency service or highly vulnerable development (including residential developments of 10 or more dwellings) within Zone C2 to Welsh Government. It should not be assumed sites located partially within C2 or less than ten units are excluded.

Until we receive written confirmation from the Authority that they believe there are overriding reasons to consider granting the application despite its location within Zone C2 we do not intend to review the submitted flood consequence assessment (FCA) and we would advise that the Authority should refuse the proposed planning application on planning policy grounds.

We also draw your attention to a recent planning appeal (see attached) in Flintshire (ref: APP/A6835/V/17/3190167), where both the Welsh Minister and the Planning Inspectorate emphasised that National Planning Policy does not allow for mitigation works to be undertaken to reduce the risk of flooding for new Highly Vulnerable Development to be considered acceptable in Zone C2. Specifically, they state that "there is no provision in TAN15 where this unequivocal position can be offset by mitigation or the presence of development benefits". They also indicate that "there is no need to consider the justification tests in TAN15...as the tests in paragraph 6.2 of TAN15 do not apply to highly vulnerable development in Zone C2".

In view of the above, we consider that it would be inappropriate for us to comment on the specific mitigation measures presented in the submitted Flood Consequences Assessment.

We note that part of the site lies outside zone C2, and we would refer you to our previous pre-application advice on this.

Protected Species

We note that the bat report submitted in support of the above pre-application (Bat Survey - Preliminary Roost Assessment) has identified the potential for bats to be present at the application site.

Bats and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017. Any development that would contravene the protection afforded to bats under the Regulations would require a derogation licence from Natural Resources Wales. A licence may only be authorised if:

- There is no satisfactory alternative and
- The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range. In addition,

- the development works to be authorised must be for the purposes of preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.

Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning (TAN5) states that the Local Authority should not grant planning permission without having satisfied itself that the proposed development either would not impact adversely on any bats on the site or that, in its opinion, all three conditions for the eventual grant of a licence are likely to be satisfied.

Although a bat report has been submitted, we consider that there currently is not enough information to assess potential effects of the proposal on any species of the bat that may be present at this site. We therefore concur with the recommendations of the ecological report that further survey is required for the purposes of informing the planning decision making process.

Requirement 2: EPS: Additional information to assess potential effects of the proposal on protected species.

Therefore, planning permission should not be granted until it can be demonstrated that the proposed development will either no harm or disturb the bats or their breeding sites and resting places at this site, or all 3 conditions for the eventual grant of a licence under the Conservation of Habitats and Species Regulations 2017 are likely to be satisfied.

NRW would refer the Planning Authority to the letter from the Welsh Government to Chief Planning Officer's dated 01 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Flood Risk Activity Permit

The location of building could also be sited on top an existing culvert of the River Gwenfro and any flood risk activities in, under, over or adjacent to a main river may require a permit from Natural Resources Wales. Further information is available on NRW website <https://naturalresources.wales/permits-and-permissions/flood-risk-activities/flood-risk-activity-permits-information/?lang=en>

Pollution Prevention

The applicant is advised to follow the guidance within the Guidance for Pollution Prevention 5 "Works and maintenance in or near water":

http://www.netregs.org.uk/media/1418/gpp-5-works-and-maintenance-in-or-near-water.pdf?utm_source=website&utm_medium=social&utm_campaign=GPP5%2027112017

During the construction phase of the proposals, any waste material which is to be removed from the site should be done so via a registered waste carrier. The waste must be taken to a facility which holds an appropriate exemption or environmental permit to accept the specified waste.

Any work which is to take place should be done so with pollution prevention in mind. Pollution prevention advice and guidance can be found via this link:

<http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

Should any pollution occur during the operational phase, Natural Resources Wales should be notified via the incident hotline – 03000 65 3000.

Please do not hesitate to contact us if we can be of any further assistance to you.

Our comments above only relate specifically to matters that are included on our checklist "Natural Resources Wales and Planning Consultations" (March 2015) which is published on our website: (<https://naturalresources.wales/planning-and-development/planning-and-development/?lang=en>). 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.

The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.

Yn gywir / yours faithfully,

Daniel Davies

Daniel Davies

Ymgynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales

Cyngor Bwrdeistref Sirol Wrecsam/ Wrexham County Borough Council
Neuadd y Dref, Wrecsam. LL11 1AY
Guildhall, Wrexham. LL11 1AY
DX: 721924 - Wrexham 4
www.wrecsam.gov.uk www.wrexham.gov.uk



The Planning Consultancy

Eich Cyf/Your Ref
Ein Cyf/Our ref
Dyddiad/Date
Gofynner am/Ask for
Rhif Cyswllt/Contact No
E-bost/E-mail

EP/PP/DC/Pre/2018/048
31st August 2018
Mr P Palmer
01978 729688
phil.palmer@wrexham.gov.uk

FAO: Matt Gilbert

Dear Sir

Proposed Residential Development (42 Apartments) on Corner of Brook Street and Bridge Street, Wrexham.

Notice under Development Management Procedure Order (Wales) 2012

I refer to your email / enquiry dated 15/08/2018 in respect of the above.

General

The site is located within Wrexham Town Centre and is served by adequate footway provision and pedestrian crossing facilities.

There are a number of car parks nearby including St. Giles and Island Green. However, St. Giles is only a short stay car park and I understand that Island Green is relatively expensive for those wishing to park for long periods of time.

The proposed development site is located on the corner of Bridge Street and Brook Street which have the following characteristics:-

Bridge Street

Bridge Street is a busy classified road subject to a 30mph speed limit along which a traffic calming scheme is in place. However, I would estimate typical vehicle speeds at being around 25mph along this section given the existing traffic calming measures in place along this section and the proximity to the signalized Brook Street / Bridge Street junction.

Any proposed / existing access in this location would normally require visibility splays of 2.4 x 33m in both directions measured to the nearside edge of the adjoining highway in accordance with Manual for Streets.

Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.
We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.



BUDDSODDWYR | INVESTOR
MEWN POBL | IN PEOPLE

There is no existing access serving the site. However, it would appear possible to construct a suitable access to serve the site which could provide the required visibility splays. I would recommend that any proposed access is located at the southern end of the site (uphill) given the proximity of the signalized junction. However, these splays have not been indicated on the submitted layout plan (Drg. No. L13).

Given the busy nature of the footway fronting the development site along Bridge Street, I would recommend that any proposed access provides pedestrian visibility splays of 2.4 x 3.3m in both directions measured from the back of the footway in which there shall be no obstruction greater than 0.6m in height. However, these splays have not been indicated on the submitted layout plan.

In order to improve access into / from such an access, I would recommend that a yellow box junction marking is installed on Bridge Street fronting the proposed access. I assume that such a feature would require a Traffic Regulation Order to permit enforcement. I would recommend that the applicant discusses this issue with our Traffic Section – contact Darren Green on Tel: 01978 729643. This will have the benefit of reducing the likelihood of any queuing issues back towards the signalized junction potentially caused by vehicles waiting to turn right into the car park of Bridge Street.

This section of Bridge Street has previously been subject to improvements utilising high quality paving materials and street lighting columns. Any proposed access in this location would need to utilise the same materials as existing to preserve the quality of this scheme.

This section of Bridge Street is subject to a Traffic Regulation Order (TRO) preventing waiting / loading.

Adequate parking and turning provision shall be provided at the proposed development site in accordance with LPGN 16.

Brook Street

Brook Street is a busy classified road subject to a 30mph speed limit. However, typical vehicle speeds could well be around 25mph along this section given the proximity to the signalized Brook Street / Bridge Street junction.

There is no vehicular access in respect of the existing Central Buildings site and no vehicular access is proposed.

Although there is an existing loading bay fronting the development site off Brook Street, this may not always be available when in use by delivery vehicles delivering to other premises in the vicinity.

A significant portion of Brook Street is subject to a Traffic Regulation Order (TRO) preventing waiting / loading. However, there are a limited number of 30 minute waiting bays further along Brook Street and along Town Hill. However, these spaces are already heavily used by existing shop owners / customers / member of public.

Parking & Turning Provision

Central Buildings (Brook Street)

I understand that it is proposed to convert the upper floors at Central Buildings to 10 no. 1 bedroom apartments without any parking provision.

There are a number of car parks nearby including St. Giles and Island Green. However, St Giles is only a short stay car park and I understand that Island Green is relatively expensive for those wishing to park for long periods of time. Although there are a limited number of 30 minute waiting bays further along Brook Street and along Town Hill, these spaces are already heavily used by existing shop owners / customers / member of public.

This area of Wrexham Town Centre already suffers from significant on-street parking problems particularly along Lea Road, Bellevue Road and Jubilee Road. It is considered that without adequate parking provision, the proposed development will exacerbate this existing problem.

A planning application (Ref: P/2010/1052) was previously submitted for the conversion to 22 apartments at Central Buildings which was refused by the Planning Department. This was later appealed but dismissed by the inspector due to the lack of parking provision.

In terms of the current proposal, LPGN 16 would normally require a maximum of 1.5 spaces per apartment equating to the maximum requirement for 15 spaces. The lack of parking provision at the site is considered unacceptable and I would not be able to support the proposed development.

Bridge Street (Land south of central Buildings) Drg. No. L13

I understand that it is proposed to construct 32 no. 1 bedroom apartments with 22 no. parking spaces off a new access at the southerly end of the site.

The submitted layout plan indicates a new 4.5m wide access located at the southern end of the site. This access appears to incorporate kerb radii and is gated approximately 7m behind the adjoining carriageway.

I would recommend that any proposed access is a minimum width of 5.5m in order to accommodate the simultaneous passage of cars / refuse vehicles. Any gates should be set back an appropriate distance to accommodate a refuse wagon clear of the highway (back of footway).

I assume the access will incorporate kerb radii. Any proposed access will need to accommodate the swept path movements of a refuse wagon without having to encroach over the centerline of the adjoining carriageway. The submitted layout plan does not indicate suitable provision for the turning of a refuse vehicle within the curtilage of the site. I would recommend that appropriate swept path details are provided indicating how a refuse vehicle will enter, turn and exit the site safely.

Consideration will need to be given to providing footways alongside the access into the rear car park for pedestrian movements.

In terms of parking and turning provision at the development site, I comment as follows:-

The provision of 22 spaces for 32 no. one bedroom flats is considered unacceptable.

Transport Advice Note

The TRICS data included in the Transport Advice Note includes data in respect of other private apartments located on "Edge of Town Centre", "Suburban Areas" and "Edge of Town" sites. However, I would not consider "Suburban Areas" and "Edge of Town" sites to be relevant to the proposed development site. I would recommend that these sites are removed from the analysis.

Managing Refuse Storage & Collection

Having discussed the issue of waste storage and collection with the Waste / Recycling Section, I comment as follows:-

I understand that the proposed 42 apartments are likely to require typically 9 no. large 1100 litre bins for general waste and around 8 no. 240 litre bins for recycling purposes. The submitted Design & Access Statement / Transport Advice Note does not provide details of where this number of bins will be stored or how they will be emptied safely without causing an issue on the adjoining highway.

If the proposed development is supported, I would recommend that a condition is imposed requiring the submission of a waste / recycling management plan. As discussed above, the applicant will need to provide details of a suitable turning facility within the site for a refuse vehicle. It may be the case that smaller private refuse vehicles will need to service the site in lieu of larger Council refuse vehicles.

I would recommend that the applicant discusses the above issue with our Waste / Recycling Section.

Construction Traffic Management Plan

If the application is supported, then I would recommend the following condition:-

No part of the development shall commence until a Construction Traffic Management Plan including provisions for contractor parking has been submitted to and approved in writing by the Local Planning Authority and the plan as is approved has been fully implemented.

I would recommend that the applicant liaises with our Traffic Section (contact Darren Green on Tel: 01978 729643) to discuss any required traffic management measures.

Scheme for Surface Water Drainage

A scheme of surface water drainage will need to be submitted for approval. I would recommend that the applicant contacts our Flood Management Officer – Neil Taunt (Tel: 01978 729734) to discuss.

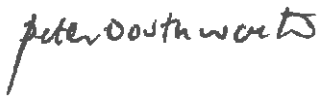
Conclusion

Given the proximity of the proposed development site to the signalized junction of Brook Street / Bridge Street / St. Giles Way / Town Hill, it is considered that the lack of parking provision and turning/ servicing provision at the site will result in indiscriminate parking / waiting in this location which would be incompatible with through traffic interests and a potential source of danger to road users and pedestrians. I would therefore not be able to support the proposed development.

If the applicant was to reduce the number of apartments and provide adequate parking (ie/ 1 parking space per apartment) and address the waste storage / recycling issues raised then further consideration could be given to the development.

You are advised that the above comments are those of an officer of the council and do not commit the Council in any way with regard to the determination of any formal planning application that may be submitted. You are also advised that the above comments take account of policies and guidance adopted by the Council at the present time and which remain open to continuous review.

Yours faithfully,



 Planning Control Manager