



FAO Matthew Phillips

21/11/2018

Dear Matthew,

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

Flood Risk

Thank you for consulting us on the planning application, which we received on 07/11/2018. The planning application proposes highly vulnerable development (housing), which is partially located in Zone C2 of the Development Advice Map (DAM) contained in Technical Advice Note 15 Development and Flood Risk (TAN15). As your Authority is aware, 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.

As agreed as part of the pilot under the Joint Improvement Programme, we would refer you to the agreed standing advice. This Standing Advice explains that your Authority should, in the first instance, make a planning policy decision on the development proposal. Until we receive written confirmation from your Authority that you believe there are overriding reasons to consider granting the application despite its location partially within Zone C2 we do not intend to review the submitted flood consequence assessment (FCA) and we would advise that your Authority should refuse the planning application on planning policy grounds.

The decision as to whether a development should be considered, contrary to TAN15 Policy, is entirely a matter for your Authority; if you consider that the development should be considered, despite its location partially within Zone C2, we would ask to be re-consulted and granted sufficient time to provide technical advice and comments on the flood risks and consequences. In such circumstances, we will review the submitted FCA.

Please inform us, in accordance with advice in paragraph 11.7 of TAN15, if you are minded to grant permission for the above application contrary to our advice and allow sufficient time for further representations to be made before any consent is granted.

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.

Protected Species

We note from the information submitted that this is a low risk bat case as defined in our guidance document 'GPG3 - NRW's Approach to Bats and Planning – Oct 2015'. Therefore, we will not comment unless you confirm that you wish to receive our comments in this case.

Please do not hesitate to contact us if you require further information or clarification of any of the above.

Our comments above only relate specifically to matters that are listed in our 'Consultation Topics' document (September 2018) which is published on our website: (<https://cdn.naturalresources.wales/media/686847/dpas-consultation-topics-august-2018-eng.pdf?mode=pad&rnd=131819256840000000>). 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.

Advice to Applicant

Pollution Prevention

Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with GPP5 and PPG6: 'Works in, near or over watercourses' and 'Working at construction and demolition sites' which are available on the following website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>
Pollution Prevention

During the construction phase you should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages.

For further guidance please refer to GPP 5 and PPG 6 at the following link:

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

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.

Ordinary Water Course

Ordinary Water Course Consent may be required from the lead local flood authority for work to an ordinary watercourse.

Yn gywir / yours faithfully,

Daniel Davies

Daniel Davies

Ymgynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales