

Wrexham County Borough Council

Ebost/Email: Northplanning@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: (0300) 065 3787

Date: 30th April 2018

Dear Sir/Madam,

APPLICATION FOR VARIATION OF CONDITION NO 1 IMPOSED UNDER PLANNING PERMISSION P/2013/0419 TO ALLOW AN INCREASE IN TIME FOR COMMENCEMENT OF DEVELOPMENT BY 10 YEARS (DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF RESIDENTIAL STUDENT ACCOMMODATION WITH DETAIL UNIT AND UNDERCROFT PARKING) 33-35 BROOK STREET, WREXHAM

Thank you for referring the above planning application received at our office 10th April 2018.

The planning application proposes highly vulnerable development housing, which is 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 is sufficient justification to consider granting the application despite its location within Zone C2 we would advise that your Authority should refuse the planning application on planning policy grounds.

The decision as to whether a development is justified is entirely a matter for your Authority; if you consider that the development can be justified, despite its location 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, an updated Flood Consequence Assessment will be required to assess compliance with test iv (in paragraph 6.2).

Requirement: The applicant submits an updated Flood Consequence Assessment (FCA)

Flood

The previous planning application for the demolition of the existing buildings and erection of new student accommodation with undercroft parking granted in 2013(LPA reference P/2013/0419 was supported by a flood consequence assessment (FCA) (Reference e0530 E0530.GCA.R1 produced by e-geo and dated May 2013. This FCA was completed using the 2009 River Gwenfro modelling study outputs which whilst valid at the time, are now almost ten years old and been replaced by an updated modelling study completed in 2016 by the Wrexham Lead Local Flood Authority.

Flood risk is an important/material consideration for this application and whilst the application does not include a copy or refer to the 2013 FCA. The FCA completed in 2013 is now out of date and cannot be relied on for this variation of condition application to extend the time frame for implementation of the development.

Requirement: The applicant submits an updated Flood Consequence Assessment (FCA)

This variation of condition application (P/2018/0283) will require an updated FCA prior to determination of the application to demonstrate if acceptable levels of flood risk and mitigation can be achieved for the lifetime of the development. Considering the updated guidance on blockage analysis produced by NRW in 2015 and Welsh Government (2016) climate change and clearly meeting the requirements of Welsh Assembly Government (2004) TAN 15 Development and Flood Risk.

The 2016 River Gwenfro modelling outputs for the FCA are available on request to Wrexham Lead Local Flood Authority flooding@wrexham.gov.uk

Other mapping data including the Development Advice Map (DAM) and Flood Zones 2 and 3 should be available from the Lle geoportal website www.lle.wales.gov.uk

It will be for the LPA to determine how this proposed development relates to TAN 15 and Welsh Governments circular 07/2012 Town and Country Planning (Notification) (Wales) Direction 2012. <http://gov.wales/topics/planning/policy/circulars/welshgovcirculares/wgc072012/?lang=en>

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.

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

Yn gywir / Yours' faithfully,

Ruth Prichard

Ymgynghorydd Cynllunio Datblygu / Development Planning Advisor

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Deialu uniongyrchol/Direct dial: (0300) 065 3787 **Siaradwr Cymraeg / Welsh Speaker**



cc: