

Cerys Jones

From: Philip Forster
Sent: 15 June 2017 12:48
To: planning_admin
Subject: FW: conversion - 2 Brook Street, Wrexham

[Can you put this email in SX3 as addinfo – P/2017/0226](#)

From: Philip Forster
Sent: 15 June 2017 12:40
To: 'Glyn Roberts'
Subject: RE: conversion - 2 Brook Street, Wrexham

Dear Mr Roberts,

I apologise for the delay coming back to you on this matter. As promised I will summarise the consultation responses received:

WCBC Highways – No objection due to comparable traffic demand and sustainable location of the development.

WCBC Public Protection – No comments

The key constraint is that the site is located in a defined Welsh Government flood zone (C2). This is because of the proximity of the site to the River Gwenfro. C2 flood zones are areas where there is no significant flood protection in place. Development designated as 'highly vulnerable' such as residential will not normally be permitted. It is for this reason we have the following objections:

WCBC Senior flood officer – *'The site is located in Zone C2 as defined by TAN15 and would result in a change of use from a low to high vulnerability use. I would strongly suggest that the views of NRW are sought on this application and the requirements for a flood consequence assessment confirmed. Recent flood modelling work undertaken by WCBC does support the flood risk classification for this site. This data can be made available to the applicant for a fee should it be required to support a site specific FCA for the site'.*

Natural Resources Wales – on the basis of the current submission NRW object to the development if no flood consequences assessment is submitted for the proposed development or if one is submitted it fails to demonstrate that the consequences of flooding can acceptably managed over the lifetime of the development. The application should be refused in accordance with the requirements of TAN15 in these instances.

Comment

My hands are tied on this issue based on current submission. The LPA are strongly advised to refuse planning permission if highly vulnerable development is proposed in C2 zones. I am in a difficult position because I do not have an FCA in relation to the development before me and without which I cannot determine the application – ultimately resulting in a refusal. I understand that you previously mentioned amending the development so that the habitable area is on the upper floors. Whilst this overcomes the immediate danger and physical risk of flooding, the issue remains that there remains a risk from the consequences of a flooding event from escape from the building.

Without an FCA, or your own guidance from an independent Flood engineer, I cannot advise that amending the scheme as discussed will be sufficient. NRW are likely to insist on the provision of an FCA before removing their objection to this or any amended proposal. Therefore at this stage, **I am formally requesting the submission of an FCA.**

Please note the comments of the WCBC Senior flood officer regarding the recent flood modelling which this Authority undertook. It supports NRW's assertion that the site falls within a C2 flood zone. You may wish to pass this on to your chosen engineer.

I would confirm that, in all other respects, I have no objection to this development. I have powers under the Town and Country Planning (Development Management Procedure) Order 2012 and to confirm that the application in its current state is now 'invalid' until such time that an FCA is submitted.

I look forward to your comment on this matter.

Regards

Phil

Philip Forster

Planning Officer/Swyddog Cynllunio

Development Control/Rheoli Datblygu

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From: Glyn Roberts [<mailto:bds.roberts@btinternet.com>]

Sent: 14 June 2017 10:54

To: Philip Forster

Subject: Fw: conversion - 2 Brook Street, Wrexham

Dear Mr Forster,
further to our telephone conversation some time ago and to my Email of 5th June, are you able to update me yet?
thank you
Glyn Roberts

On Monday, 5 June 2017, 10:01, Glyn Roberts <bds.roberts@btinternet.com> wrote:

Dear Mr Forster,
I would appreciate an update following my telephone conversation with you two weeks ago.
many thanks
Glyn Roberts