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**WARD :** Rhyl West

**WARD MEMBERS:** Cllr Alan James (c)  
Cllr Joan Butterfield

**APPLICATION NO:** 45/2019/0181/ PF

**PROPOSAL:** Refurbishment and conversion of two derelict houses to form 4 1xbed apartments on the first floor (to provide supported accommodation for the homeless) with ground floor offices

**LOCATION:** 17/19 Westbourne Avenue Rhyl LL18 1EG

**APPLICANT:** Mr Lyndon Wilson, Adullam Housing Association

**CONSTRAINTS:** C1 Flood Zone  
Conservation Area  
Article 4 Direction

**PUBLICITY UNDERTAKEN:** Site Notice - Yes  
Press Notice - No  
Neighbour letters - Yes

**REASON(S) APPLICATION REPORTED TO COMMITTEE:**  
**Scheme of Delegation Part 2**

- Recommendation to grant / approve – 4 or more objections received

**CONSULTATION RESPONSES:**

RHYL TOWN COUNCIL  
"No objection"

DWR CYMRU / WELSH WATER  
No objection

**NATURAL RESOURCES WALES**

Concerns raised over development in a C1 Floodzone. However acknowledge the proposal would result in 'betterment' in terms of flood risk as scheme would be less intensive than previous uses. Recommend condition if the Planning Authority are minded to grant.

**BETSI CADWALADER UNIVERSITY HEALTH BOARD TRUST**

"There is an identified need for accommodation of this type in Rhyl to support homeless individuals.

- The development is in keeping with the direction set out in the North Wales Regional Homeless Strategy.
- The development is part of the Denbighshire Supporting People workstream, and is therefore in keeping with locally-identified priorities.
- The conversion of derelict houses is also part of the Rhyl Regeneration Programme, and bringing disused accommodation back into use is in keeping with the regeneration objectives set out by the local authority.
- Most of the individuals earmarked to use the proposed development are local residents. There should, therefore, be no additional demand on health services in the Rhyl locality. The housing provision and contact with established services should, if anything, provide an opportunity for these individuals to take greater control over their own health and wellbeing.

Based on these factors, the Health Board would support the application"

**NORTH WALES POLICE**

Since the application is from a Registered Social Landlord and appears to be publicly funded, the provisions of WHQS and DQR apply in terms of security. Have written to the architects to request that an application for a Secured By Design award is made.

**DENBIGHSHIRE COUNTY COUNCIL CONSULTEES –**

Highways Officer

No objection.

Community Support Services

No objection.

Housing and Community Development Service

No objection.

Planning Policy

No significant policy conflicts, recommend development contributions are provided in line with planning policy requirements.

**RESPONSE TO PUBLICITY:**

In objection

Representations received from:

Juli Blunt, 37, Westbourne Avenue, Rhyl

Valerie Oatway, 39, Westbourne Avenue, Rhyl

Darrell Moss, 25, Westbourne Avenue, Rhyl

Sherry Lewis, 35, Westbourne Avenue, Rhyl

Sarah Burns, 25, Westbourne Avenue, Rhyl

Reuben Owens, 37 Westbourne Avenue, Rhyl

Jessica Hymus-Gant, 3 Oakland Avenue, Rhyl

Deborah Munro, 8, Seabank Road Rhyl

David Thomas, 13, Lake Avenue, Rhyl

Michael Jones, 29 Seabank Road, Rhyl

Mrs Laura Pownall, 29 Westbourne Avenue, Rhyl

Alan Heseldin, 31 Westbourne Avenue, Rhyl

Judith Samuel, 6 Seabank Road, Rhyl

Paula Jones, 1a Victoria Avenue, Rhyl

John and Margaret Dallow, 13 Westbourne Avenue, Rhyl

Steve Gilmour, 21 Westbourne Avenue, Rhyl

Will Stoodley, 197 Edgwarebury lane, Edgware

Petition with 43 signatures c/o Mrs S Lewiis, 35 Westbourne Av., Rhyl

Summary of planning based representations in objection:

Character of the area-

Inappropriate use in a residential area.

Security concerns-

Over nature of the users and due to lack of overnight staffing arrangements. Would local residents be at risk from potential occupiers?

Highways and traffic-

Insufficient parking for use, there are existing parking problems in the area.

Amenity-

Potential for noise and disturbance from the use.

Need-



There are similar facilities in the area as existing, are more required? DCC demolished HMO's in West Rhyl. Is the development a retrograde step?

Planning policy-  
Proposal is contrary to floor space standards.

**EXPIRY DATE OF APPLICATION: 29/04/2019**

**EXTENSION OF TIME AGREED: 10/10/2019**

**REASONS FOR DELAY IN DECISION (where applicable):**

- re-consultations / further publicity necessary on amended plans and / or additional information
- awaiting consideration by Committee

**PLANNING ASSESSMENT:**

**1. THE PROPOSAL:**

**1.1 Summary of proposals**

- 1.1.1 The application proposes the refurbishment and conversion of no's 17 and 19 Westbourne Avenue to form 4 one bedroom apartments with ground floor office accommodation. The apartments and offices are proposed to provide supported accommodation for the homeless.
- 1.1.2 Office accommodation and ancillary staff facilities are proposed on the ground floor.
- 1.1.3 The upper floors of the conversion would comprise of two flats on the first floor and two flats above. The one bedroom flats would range in size from 41 square metres to 55 square metres. The flats would be accessed from the ground floor via two sets of communal stairs on each side of the properties.
- 1.1.4 To facilitate onsite parking a single storey rear extension on the building is proposed to be removed. Six parking spaces would be arranged within the rear yard with access from Oakland Avenue to the south of the site. An amenity area is proposed at the side of the building and bin stores are proposed for the flats and offices.
- 1.1.5 The Applicant for the scheme is Adullam Homes. The company is being commissioned by the Council to provide supported housing for the Council.
- 1.1.6 In relation to the management of the use and operation the Applicants have advised;  
*"Its primary remit was to provide a multi-disciplinary, homeless prevention service, with an asset-based model to 68 clients (26 supported housing units dispersed, 5 units at Westbourne Ave and 37 community floating support Clients). A team of 10 staff will operate from Westbourne House, the team rota will cover 8am-8pm with an on call out of hours facility over 7 days. For the hours in which staff are not in attendance, the property will have CCTV with the latest remote viewing and recording facilities. The service does not require a concierge/ overnight staffing structure due to the size of the service (less than 12 occupants). Occupants will be issued licences (protected or excluded depending on their statutory homelessness status) supported by Adullam Homes ASB policies and procedures along with a complaints policy."*  
  
*"We are subject to regular service review by Supporting People commissioners and submit quarterly contract monitoring returns against contract requirements."*

*“Supported housing units at Westbourne House will be occupied on a temporary basis from 12 weeks up to 2 years on a License agreement, move on policies and procedures are outlined in the service contract. We aim to work in partnership with local agencies, the local community and local SP funded services this is especially relevant to our Learning & Engagement function which we can extend to other local SP providers.”*

The Commissioning Section within the Council has clarified as below:

*“- This is not a HMO development proposal. This is shared supported housing, offering a supportive and psychologically informed environment for people who would otherwise be facing homelessness. It is staffed during the day, with robust out of hour’s arrangements, which means that concerns that there may be around ASB etc. in relation to HMOs should not apply.*

*- Part of the regeneration of Rhyl also involves efforts to tackle homelessness. This is a homelessness prevention project.*

*- The project also involves the renovation of a currently derelict building, in a state of poor disrepair – Adullam will be bringing the property up to a very high spec., and delivering numerous benefits to local services and the local community through the provision of support for vulnerable people, offering a training room, and numerous opportunities for community involvement/co-production.*

*- The project very much supports the delivery of the Denbighshire Homelessness Strategy 2017-21. It is very concerning if Planning is taking the position that shared supported housing constitutes a HMO, as the decision to block the development of any further shared supported housing in Denbighshire would most certainly have very worrying implications for homelessness.”*

## 1.2 Description of site and surroundings

- 1.2.1 The three storey Victorian properties are located on the western side of Westbourne Avenue in West Rhyl. The site occupies a corner plot on the junction with Oakland Avenue.
- 1.2.2 The area is approximately 1km from the town centre and is predominantly residential in character, with other land uses including a Bowling Green opposite the properties and Marine Lake to the rear, off Oakland Avenue.

## 1.3 Relevant planning constraints/considerations

- 1.3.1 The site is located within the development boundary of Rhyl.
- 1.3.2 It is within the Rhyl Central Conservation Area.

## 1.4 Relevant planning history

- 1.4.1 There is no relevant planning history on the site.
- 1.4.2 It is understood that historically one of the properties was subdivided into bedsits and operated as a House in Multiple Occupation (HMO) but this use was not formalised and did not have planning permission, nor was the address registered as a licenced HMO.
- 1.4.3 Historic Council Tax records show 5 flats for no. 17 and no. 19 is recorded as a single unit.

## 1.5 Developments/changes since the original submission

- 1.5.1 Since the submission of the application, additional information was sought to address flood risk issues and highways concerns over parking.
- 1.5.2 To address the flooding issue the plans were amended, and an additional ground floor flat omitted from the scheme.

1.5.3 The parking situation has been addressed by the proposed demolition of the ground floor rear extension to enable the space to be used as a parking area.

1.6 Other relevant background information

None.

**2. DETAILS OF PLANNING HISTORY:**

2.1 None.

**3. RELEVANT POLICIES AND GUIDANCE:**

The main planning policies and guidance are considered to be:

3.1 Denbighshire Local Development Plan (adopted 4<sup>th</sup> June 2013)

**Policy RD1** – Sustainable development and good standard design

**Policy BSC1** – Growth Strategy for Denbighshire

**Policy BSC3** – Securing infrastructure contributions from Development

**Policy VOE5** – Conservation of natural resources

**Policy ASA3** – Parking standards

**Supplementary Planning Guidance**

Supplementary Planning Guidance Note: Parking Requirements in New Developments

Supplementary Planning Guidance Note: Planning Obligations

Supplementary Planning Guidance Note: Residential Developments

3.2 Government Policy / Guidance

Planning Policy Wales (Edition 10) December 2018

Development Control Manual November 2016

3.3 Other material considerations

**4. MAIN PLANNING CONSIDERATIONS:**

In terms of general guidance on matters relevant to the consideration of a planning application, Section 9.1.2 of the Development Management Manual (DMM) confirms the requirement that planning applications 'must be determined in accordance with the approved or adopted development plan for the area, unless material considerations indicate otherwise'. It advises that material considerations must be relevant to the regulation of the development and use of land in the public interest, and fairly and reasonably relate to the development concerned.

The DMM further states that material considerations can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment (Section 9.4).

The DMM has to be considered in conjunction with Planning Policy Wales, Edition 10 (December 2018) and other relevant legislation.

The following paragraphs in Section 4 of the report therefore refer to the policies of the Denbighshire Local Development Plan, and to the material planning considerations which are considered to be of relevance to the proposal.

4.1 The main land use planning issues in relation to the application are considered to be:

4.1.1 Principle

4.1.2 Visual amenity

4.1.3 Residential amenity

4.1.4 Highways (including access and parking)

4.1.5 Open Space

4.1.6 Floodrisk

4.1.7 Fear of crime

#### 4.2 In relation to the main planning considerations:

##### 4.2.1 Principle

The vision of the adopted Local Development Plan is to make Rhyl an attractive place to live and work with improved housing stock and a reduction in the levels of multiple deprivation currently seen.

Rhyl has been identified in the Local Development Plan as a lower growth town, BSC1, allocated to make an important contribution to the overall housing and employment requirements of the County. The policy refers to meeting the housing needs of local communities through the provision of a range of house sizes, types and tenure to reflect local need.

Policy BSC 7 relates to self-contained flats and houses of multiple occupation as it acknowledges that the cumulative impact of converting larger dwellings to flats can have a detrimental impact on creating mixed and balanced communities by reducing the number of family homes available within an area. The policy acknowledges that there is a high concentration of Houses in Multiple Occupation and small flats in the coastal towns, which has had an adverse impact upon the surrounding area and living conditions of some occupants. In order to support national and local regeneration aims, as well as other adopted council policy, further developments of this type (HMO's) will not be allowed anywhere in Denbighshire.

Policy RD1 advises that proposals should i) be suitable for their location, vi) not impact negative on the character of the area and ix) should have regard to the adequacy of existing public facilities and services in the area.

Chapter 9 of Planning Policy Wales sets out Welsh Government's objectives in relation to housing. Welsh Government's approach to Housing is set out in the National Housing Strategy and seeks to provide more housing of the right type and offer more choice; improve homes and communities, including the energy efficiency of new and existing homes; and improve housing related services and support, particularly for vulnerable people and people from minority groups. Chapter 8 stresses the importance of creating mixed communities and providing a mix of housing types.

The application proposes the change of use of two properties from a single dwelling and unauthorised HMO. The apartments and offices are proposed to provide supported accommodation for the homeless. The nature of use is set out in the paragraphs above.

In relation to the principle of the proposed use, surmised from Officers assessment of the proposal and the representations received, there appear to be three main issues to consider. These are set out below:

##### 1. The principle of the change of use from an unauthorised HMO and dwelling to four flats with ancillary support services.

The site is located within the development boundary where the principle of residential development is acceptable. This is a relatively unique form of development owing to the nature of the proposed use (homeless accommodation and support services). In Officers' opinion, the change from an unauthorised HMO and dwelling to the four self-contained flats would not be contrary to policy BSC 7, which seeks to resist further HMO development. In addition the use would provide employment for up to 10 individuals to support the occupiers of the units and their families.

##### 2. The prevalence of other support service uses in proximity to the site and how these, along with the proposed use, may continue to define and shape the character of the area impacting upon the overall regeneration aims of Rhyl.

The site is located 1km from Rhyl Town Centre which, it is recognised, requires investment and regeneration. The area in which the application site is located is not allocated for any particular planning use but the main land uses are residential with some leisure uses. There is a mental health facility on Westbourne Avenue which

provides day time community based mental health services for adults. There is also a supported housing unit for 3 males (similar to that proposed in the application) on Seabank Road.

In terms of the history of the area, West Rhyl has made a significant contribution to the tourist economy of Rhyl since the Victorian era, with a concentration of hotel and bed and breakfast accommodation in close proximity to the promenade and seaside attractions. The tourism function has declined over the years, resulting in a concentration of poor quality multi occupancy housing, an imbalanced tenure profile and high levels of social deprivation. The poor image and perceptions of the area have deterred private sector investment and contributed to depressed market values that have perpetuated problems. Significant effort and resources have been committed to address the urban decay and rejuvenate the built environment and the communities in the area, and whilst it is difficult to assess the full impacts of this regeneration work, it is a factor to be considered when handling applications such as this.

The properties are currently unoccupied and falling into a state of dereliction which detracts from the appearance of the area. It is concluded that the properties are suitable for conversion and given the limited amount of other support services in the area it is suggested the use will not have an unacceptable impact on the character of the locality or lead to an over concentration of this type of use contrary to overarching regeneration aims.

### 3. Queries relating to the need for the use in Denbighshire.

In their consultation response the Council's Policy and Housing Section have advised that there is a need for the proposed accommodation and service. The Council would be commissioning the service.

Whilst the establishment of a need for this type of use is not necessarily a planning requirement, Officers consider that the evidence provided by colleagues identifies that the scheme would be utilised to support by existing homeless people in the area. This development will contribute towards meeting this identified need as evidenced by the Policy and Housing Officers in the Rhyl West Housing Market Assessment. This assessment highlights the number of homelessness presentations in Rhyl West Ward. The assessment also highlights the need for more 1 bed properties in this area.

#### 4.2.2 Visual amenity

Local Development Plan Policy RD 1 test (i) requires due regard to issues of siting, layout, form, character, design, materials, aspect, microclimate and intensity of use of land / buildings and spaces between buildings, which are matters relevant to the visual impact of development; test (vi) requires that development does not unacceptably affect prominent public views into, out of, or across any settlement or area of open countryside; test (vi) requires the incorporation of existing landscape or other features, takes account of site contours, and changes in levels and prominent skylines; and test (xiii) requires the incorporation of suitable landscaping measures to protect and enhance development in its local context.

Policy VOE 1 looks to protect sites of built heritage from development that would adversely affect them. Development proposals should maintain and wherever possible, enhance these areas for their characteristics, local distinctiveness and value to local communities.

The application proposes the refurbishment of two Victorian properties in the Conservation Area. As part of the scheme, existing inappropriate extensions to the buildings would be removed to facilitate the creation of a parking area.

In Officers' opinion, there are no concerns in relation to visual amenity impacts arising from the proposed development.

#### 4.2.3 Residential amenity

Local Development Plan Policy RD 1 test (i) requires due regard to issues of siting, layout, form, character, design, materials, aspect, microclimate and intensity of use of land / buildings and spaces between buildings, which touch on the potential for impact on residential amenity; test (vi) sets the requirement to assess the impact of development on the amenities of local residents, other land and property users, or characteristics of the locality, in terms of increased activity, disturbance, noise, dust, fumes, litter, drainage, light pollution, etc

Policy BSC 7 and SPG Residential Floor Space Standards also require amenity issues to be considered for proposals to subdivide properties in to self-contained flats.

There are representations in relation to residential amenity impacts arising from the proposal.

Whilst two of the flats fall short of the adopted floor space standards in the SPG it is relevant that there is communal space within the ground floor of the building where support services will be provided for the occupiers. Also, given the nature of occupancy, the flats would be occupied by single people and lived in for a period of 6 weeks to 2 years only. If permission were to be considered, it would be appropriate to attach a condition ensuring the use is restricted to the purposes described, and should the use cease, or alternative uses be proposed, planning permission would be required, allowing due consideration of the amenity impacts at that point. Hence on balance, having regards to the above, the levels of amenity for potential occupiers, both internally and externally, is considered acceptable, and it is concluded the proposal complies with Policy RD1, BSC 7 and SPG.

In Officers' view, considering the nature of the use and the management proposals, there are unlikely to be significant residential amenity impacts arising.

#### 4.2.4 Highways (including access and parking)

Local Development Plan Policy RD 1 supports development proposals subject to meeting tests (vii) and (viii) which oblige provision of safe and convenient access for a range of users, together with adequate parking, services and manoeuvring space; and require consideration of the impact of development on the local highway network. Policy ASA 3 requires adequate parking spaces for cars and bicycles in connection with development proposals, and outlines considerations to be given to factors relevant to the application of standards. The Parking Standards in New Developments SPG sets out the maximum parking standards for new developments, the requirement for parking is 1.5 spaces per 1 bed dwelling and 1 space per 35m of office accommodation. This is a maximum requirement and mitigating circumstances such as access to off-site parking and provision of public transport will be taken into account.

These policies reflect general principles set out in Planning Policy Wales (PPW 10).

There are representations in relation to the highways impacts arising from the proposal.

The proposal includes parking for 6 cars to the rear of the properties. On street parking is available on Westbourne Avenue. The site is located close to the town centre within walking distance of local shops and facilities, and a bus and train station. The Head of Highways has raised no objection to the scheme.

Whilst it is noted that only 6 parking spaces are proposed to be provided, the town centre location and nature of the proposed users has to be considered. It is the opinion of Officers that it would be difficult to resist the proposal for parking reasons alone particularly where planning policies are in place to reduce reliance on the private car and promote sustainable means of transport. It is not considered that the proposal conflicts with the highways considerations of Policy RD1.



#### 4.2.5 Open Space

Policy BSC 3 of the local development plan sets the basic requirement for development to contribute, where relevant, to the provision of infrastructure, including recreation and open space, in accordance with Policy BSC 11.

Policy BSC 11 sets out the requirements for open space provision in relation to new developments, with further detail being provided in SPG Recreational Public Open Space (2017). The SPG states that “specialist forms of development where children will not be resident will not be expected to provide children’s playspace” as this proposal is for homeless individuals, it is unlikely that children will be resident. The calculation for open space assumes a household size of 2.3 persons per unit. As this proposal is for 1 bed units it is considered reasonable to reduce this occupancy level, basing the calculation on 4 residents being present and removing the requirement for children’s playspace, a reduced commuted sum would be payable towards open space improvements in the area.

It is considered that the proposal would be acceptable in relation to open space subject to the requisite contribution being secured by virtue of a S106 or Unilateral Undertaking.

#### 4.2.6 Floodrisk

TAN 15 is Welsh Government’s planning guidance note relating to flood risk. The aim of TAN 15 is to direct new development away from those areas which are at high risk of flooding, and to only permit development in high risk areas which can be justified on the basis of the tests outlined in the TAN.

The site is located within a C1 flood zone, described as “areas of the floodplain which are developed and served by significant infrastructure, including flood defences.” As a result of the location of the site in this area, the original layout was amended to remove the ground floor accommodation and an amended FCA was requested by Natural Resources Wales. The submitted FCA outlined the potential flood risks at the site and set out series of flood resilient and resistant measures to provide a means of reducing the potential impacts of flooding. NRW considered the FCA and have advised that whilst they have concerns about residential development in the flood zone, they do not object to the development given the history of the site and the less intensive use now involved.

Having regard to the fact the proposals relate to an existing residential property, and to the NRW advice in relation to flooding issues, it is considered that the proposal is not in conflict with policy TAN 15 in terms of flood risk.

#### 4.2.7 Fear of crime

Policy RD 1 - Sustainable development and good standard design test xii) states that development should take account of personal and community safety and security in the design and layout of development and public/private spaces and have regard to implications for crime and disorder.

Concerns have been raised locally over the impact on the service users on the area and the potential for increased crime / disturbance etc.

Case Law demonstrates that fear of crime can be a material consideration, and test xii) of RD1 adds a policy hook for such a consideration. However, as with all impacts, evidence is required to substantiate what risk may arise from a particular development / use. The Agents have advised how the service would operate and how occupiers would be assessed and managed (set out in para. 1.6.2 above). In noting the concerns of local people, respectfully, there is no clear evidence to suggest that the facility would have clearly negative implications for crime and disorder, and it is difficult to conclude this should be a significant factor weighing against the grant of

permission.

#### Other matters

##### Well – being of Future Generations (Wales) Act 2015

The Well-being of Future Generations (Wales) Act 2015 imposes a duty on the Council not only to carry out sustainable development, but also to take reasonable steps in exercising its functions to meet its sustainable development (or well-being) objectives. The Act sets a requirement to demonstrate in relation to each application determined, how the development complies with the Act.

The report on this application has taken into account the requirements of Section 3 'Well-being duties on public bodies' and Section 5 'The Sustainable Development Principles' of the Well-being of Future Generations (Wales) Act 2015. The recommendation is made in accordance with the Act's sustainable development principle through its contribution towards Welsh Governments well-being objective of supporting safe, cohesive and resilient communities. It is therefore considered that there would be no significant or unacceptable impact upon the achievement of well-being objectives as a result of the proposed recommendation.

## **5. SUMMARY AND CONCLUSIONS:**

5.1 Officers accept there are a number of concerns regarding the proposed use. However, in the absence of tangible evidence to demonstrate the harm which would arise, it would be difficult for Officers to recommend against the grant of permission. Furthermore, it is considered that the link the Council has with the commissioning of the use, alongside planning conditions which seek to control the use having regard to the information supplied and management arrangements set out, will mitigate any potential risks.

### **RECOMMENDATION: -**

It is recommended that permission be GRANTED subject to:

- Completion of an Agreement under Section 106 of the planning act to secure an open space contribution of £1237.22 (as per OS Calculator).

In the event of failure to complete the Agreement within 12 months of the date of the resolution of the grant of permission, the application would be reported back to the Committee for determination against the relevant policies and guidance at that time.

The Certificate of Decision would not be released until the completion of the Agreement.

1. The development to which this permission relates shall be begun no later than .....insert DATE (5 years).
2. The development hereby permitted shall be carried out in strict accordance with details shown on the following submitted plans and documents unless specified as otherwise within any other condition pursuant to this permission:
  - (i) Existing elevations, floor and site plans (Drawing No. 002 Rev. A) received 26 February 2019
  - (ii) Proposed elevations, floor and site plans (Drawing No. 003B) received 5 September 2019
  - (iii) Location plan (Drawing No. 001) received 26 February 2019
3. The facilities for the parking and turning of vehicles within the site shall be completed in accordance with the approved plan before the development is first brought into use, and shall be retained as approved at all times thereafter.
4. The use of the property shall be limited to the purposes described in the Design and Access Statement and Supporting Statements, to provide temporary accommodation (6 weeks to 2 years) to homeless individuals. The office accommodation shall be used for ancillary support services for the homeless use. No alternative uses shall be permitted without the further granting of planning permission.

5. None of the flats hereby permitted shall be occupied until provision has been made within the site for the bin stores and drying area, in accordance with the details approved by the Local Planning Authority.
6. The development shall be carried out strictly in accordance with the Flood Consequences Assessment produced by Rob Lobley Consulting Doc Ref RLC/0351/FCA01 the and the recommendations in relation to flood proofing measures and flood plan production therein.

The reasons for the conditions are:-

1. To comply with the provisions of Section 91 of the Town and Country Planning Act 1990.
2. For the avoidance of doubt and to ensure a satisfactory standard of development.
3. To ensure the development is served by a safe and satisfactory access and parking/turning facilities, and in the interests of the free and safe movement of traffic on the adjacent street.
4. To enable consideration of the amenity impacts of alternative uses.
5. To ensure the units are serviced by adequate storage and drying facilities in the interests of visual and residential amenity.
6. In the interest of reducing the potential impacts of flooding.