ATISN 19180 ITEM 015

Iles, Nicholas (CCRA - Planning)

Subject:

FW: 021/2022 Ceredigion Planning Application A210615

Attachments:

202112callin2.docx

From:

Sent: 13 February 2022 20:46

To: Planning Directorate Mailbox

Subject: 021/2022 Ceredigion Planning Application A210615

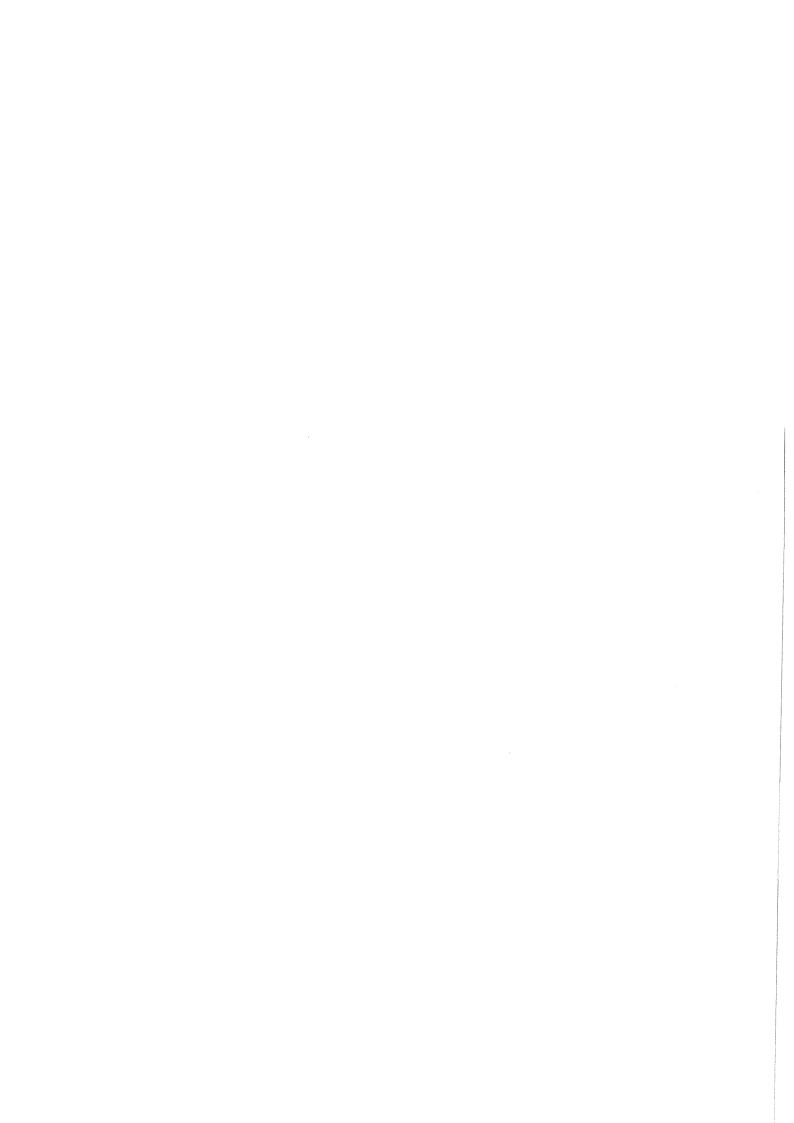
I attach a copy of a letter sent to you on 14 December regarding this application. I sent the message by post because

the e-mail address I had

I have not received a reply to my letter nor an acknowledgement.

I would be grateful if you could look into this and let me know the current position.

Yours sincerely





14 December 2021

Planning Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Ceredigion Planning Application A210615

This planning application, currently being considered by Ceredigion County Council, concerns development in a C2 area subject to flooding and should therefore observe TAN15. I ask that the Minister call in this application in order to see that TAN15 is taken seriously as part of an Environmental Impact Assessment (EIA), as a matter of national planning policy rather than local policy.

Application A210615 is almost identical to planning application permission by Ceredigion in 2020. The reasons for refusal were that the application was for a large two storey dwelling in open countryside, beyond the limits of the county development plan, did not meet criteria for exception, being neither affordable nor agricultural, and that it was contrary to TAN6 and Policies SO1, SO4, DM06, DM10 and DM17 of the Ceredigion Local Development Plan. The particulars of the decision made no reference to TAN15 which concerns flooding.

The Planning Committee of Ceredigion County Council met on 24 November 2021 and failed to agree on the new application, A210615. Instead it decided to defer the matter for one month. A press report in the Cambrian News of 1 December 2021 says the matter was to be passed to a 'task and finish' panel.

the site of the proposed development. Any development in Cae Main will increase the flood risk to Dolau-gwyn, and is in clear breach of planning policies. In the past the threat of flooding has not been taken very seriously by the authorities and TAN15 has not been mentioned as a reason for refusing previous applications. It was very heartening therefore to see that Julie James, the Minister for Climate Change, had introduced a new version of TAN15 which was published and came into effect on 1 December 2021. However, in her letter of 23 November 2021 the Minister says that she is suspending the coming into force of the new TAN15 and Flood Map for Planning until 1 June 2023, allowing local authorities time to review Strategic Flood Consequences Assessments.

Is it possible that local authorities will use this period from 1 December 2021 to 1 June 2023 not in the way intended by the Minister but as an opportunity to push through applications that have flood implications, such as A210615, ahead of the 2023 deadline? In fact the Minister's letter gives rise to uncertainty because her stance on the threat of flooding in regard to planning policy is ambivalent

during the period stated and gives local councillors the opportunity to breach TAN15 until 1 June 2023. The Audit Wales Review of Ceredigion Planning Service has shown that the Planning Committee usually rejects the advice of its professional officers, takes decisions based more on personal considerations than policy and ignores 'knock-on implications' - exactly the situation in the case of
Because this area is a C2 zone and highly vulnerable to flooding I understand that if the application is granted by Ceredigion County Council it will be called in by the Welsh Government in any case and that Natural Resources Wales may oppose the application. An Environmental Impact Assessment (EIA) of the proposal is required as soon as possible.
Below I include a plan of the proposed development and photographs of the site. These confirm the flood maps of Natural Resources Wales which show that the site is a highly vulnerable development and that Dolau-gwyn is at high risk of flooding.

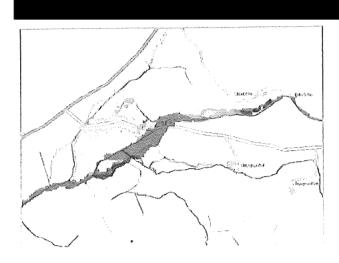
Yours sincerely

Iwan Jones

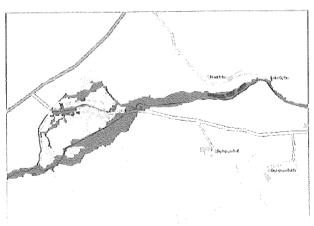
This photograph (from Google Earth) shows Dolau-gwyn in the centre with Afon Ceiro twisting around the house. The river also flattens out and narrows at this point so that extremely heavy rainfall in the hills causes the river to overflow on both sides into the fields, gardens and houses:



Portion of the Natural Resources Wales flood map showing areas at high risk of flooding in blue.



This is the Natural Resources Wales flood map used for planning purposes, showing areas at risk without regard to flood defences. Again, re entirely in high risk areas:





Flooding in the village of in 1998. Floodwater entered (in the distance) and on the middle left:

Flooding at in 2018:

Flooding in the village of in 2018, when water entered , the next house on the right.

