Lower Berse Farm, Wrexham.

Outline development proposal for up to 1450 dwellings plus associated roads, open space, community facilities and a site for a primary school.

Addendum to Planning Statement

the Planning Consultancy

1. **Introduction.**

1.1. Since the application proposal (ref: P/2023/0593) was submitted, there have been two significant changes in relation to key policy documents:

1.1.1. A revised version of Planning Policy Wales has been released (Version 12)

1.1.2. The hitherto adopted Unitary Development Plan has been formally replaced by the now adopted Local Development Plan.

1.2. It is, therefore, considered appropriate to re-appraise the development proposals in the light of the current policies having particular regard to sustainability and transport proposals which, in discussions with the LPA to date, have appeared to be the matters of most significant debate. This process will bring the policy assessment of the proposal fully up to date and, as will be demonstrated, further reinforce the reasons why planning permission should be granted.

1.3. The starting point is, of course, that the application proposal is allocated for development in the adopted development plan, the LDP, and this was prepared having full regard to the policy guidance within Planning Policy Wales (PPW). It would, therefore, be extraordinary if it was suggested that the proposal was not entirely consistent with the requirements of both documents (albeit that there is now a revised version of PPW, amended most notably in relation to the requirement for a Green Infrastructure Statement which has been supplied in support of this application, the basic approach of the document remains unaltered).

1.4. PPW and the LDP are considered separately in the following sections of this Addendum.

2. **Planning Policy Wales, Edition 12.**

2.1. PPW emphasises from its' outset the importance of sustainability with para 1.2 stating that:

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales….A well-functioning planning system is fundamental for sustainable development and achieving sustainable places.

2.2. PPW also refers to the role of development plans, with para 1.22 indicating that development plans are the basis of the planning system, the paragraph goes on to state that:

Plans at all levels must be prepared in accordance with national planning policies.

The Examination of the LDP has provided the opportunity for the Plan to be tested against the requirements of National policy and, in declaring the Plan sound, the Inspectors satisfied themselves that the Plan, including its allocations, were sound and, amongst other objectives, met the sustainability objectives of PPW.

2.3. The second section of PPW emphasises the above approach, making clear in para 2.1 that:

Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities.

The following paragraph goes on to state that:

Sustainable Places are the goal of the land use planning system in Wales; they are the output of the planning system rather than the process of achieving them.

The LDP has only recently been adopted, it would be illogical to argue that it was out of date or to suggest that it was in any way based on an approach that was unsustainable

given the process of examination that it has been through which has had full regard to sustainable principles. The proposals for development on the application site seek to bring forward a Key Strategic Site for development that is identified in the LDP, it would be similarly illogical to argue that this was anything other than a sustainable proposal because it forms a significant part of the overall strategy.

2.4. As section 3 of PPW emphasises, effective placemaking requires "early collective consideration of placemaking at the outset, in the formulation of a development plan, or when developing specific proposals". Para 3.2 goes on to make clear that:

The choices made at this stage should be shaped by appropriate engagement with the public and other stakeholders….

It is important to emphasise that this is a 'collective' process in which the public and other stakeholders have had a full opportunity to participate as part of the sustainable approach to placemaking, via the initial consultation on the initial draft of the Plan, which included a proposal for development on the application site, consultation on the Deposit draft, and participation during the Examination in Public. Whilst it is recognised that there have been a number of objections to the principle of development on the application site, it must be recognised that the principal opportunity to seek to resist the development of the site was through the LDP consultation process and not now that the site is formally allocated for development within a Plan that has sustainability principles at its heart.

2.5. The application site is, of course, a greenfield site on the edge of Wrexham, PPW acknowledges in Section 3 that planning authorities should prioritise the use of "suitable and sustainable previously developed land and/or underutilised sites located within existing settlements" (para 3.43), however, para 3.44 goes on to state that:

Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements.

This is a process that the LDP has been through, it has been concluded that in order to meet

the development needs of the County Borough greenfield land, such as the application site, needs to be developed (see paragraph 7.2 of the LDP Inspectors Report). It is important to emphasise that PPW (above) makes clear that greenfield sites can be both 'suitable' and 'sustainable'.

2.6. Section 4 of PPW discusses the concept of Active and Social Places which contribute to the national sustainable placemaking outcomes by promoting social, economic, environmental and cultural well-being by providing well connected communities. Paragraph 4.01 identifies the planning policy topics that contribute towards Active and Social Places and, whilst these have been covered elsewhere within the application submissions, each of them are addressed briefly as follows:

2.6.1. Transport It is explained at paragraph 4.1.1 that the planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys. In this regard it is clear that the location of the application site, together with the facilities proposed to be provided within it, would result in residents having access to services and facilities within travel distances that fulfil the objectives of shorter, more efficient and sustainable journeys:

- A primary school (proposed) within the development and a secondary school on its immediate boundary.
- Major supermarket shopping on Ruthin Road within walking distance of the site, together with proposals for a local shop within the proposed local centre.
- Employment within the Western Gateway development on the opposite side of Ruthin Road, at the Hospital, and within the employment areas beyond.
- The City Centre within walking and cycling distance of the site.

2.6.2. Reference has also been made to the sustainable transport hierarchy which looks to give priority to meeting the demand for travel by walking, cycling and public transport ahead of private vehicles. The potential for walking and cycling has been commented on above, but, in addition, the Applicant's propose a major investment in bus service provision to link the development to the City Centre, providing public transport links, not only for the development itself, but also significant improvements in accessibility for all those people along or close to the bus routes outside of the site itself.

2.6.3. Paragraph 4.1.5 emphasises that development plans provide the main means for achieving integration between land use and transport planning, this is addressed further in the context of LDP policies in the next section of this Addendum, but it is clear that the key objectives of PPW in this context are met by this development. The issue is further emphasised under the sub-heading of Sustainable Transport at paragraph 4.1.8. where the Government's commitment to reduce reliance on the private car is set out, with paragraph 4.1.10 emphasising again that the planning system has a key role to play in reducing the need to travel and supporting developments which are in the right locations, which are integrated with existing land uses and neighbourhoods and which make it possible for all short journeys to be easily made by walking and cycling. The application site has been considered in this context and allocated accordingly and the brief analysis here, and also within the Transport Assessment, makes clear that the development would fulfil the PPW objectives.

2.6.4. Housing Paragraph 4.2.1. emphasises the need to provide for a mix of both market and affordable housetypes, tenures and sizes to cater for the range of identified housing needs, thereby contributing to the development of sustainable and cohesive communities. Subsequent paragraphs set out in detail the factors to be considered in assessing housing need, emphasising the need to collaborate not only with private housebuilders, but also with the community; this is a process that was considered in detail through several specific sessions at the Examination in Public in relation to the LDP following which the application site was confirmed as an allocation.

2.6.5. The current application is an outline application and, therefore, the precise mix of housing is yet to be determined, the Applicant's have, nevertheless made clear their intention to provide a range of different housetypes within the development, including a 15% affordable housing contribution which is the LPA's policy requirement for the development.

2.6.6. Retail and Commercial Paragraph 4.3.1. states that retail and commercial centres are hubs of social and economic activity and the focal point for a diverse range of services which support the needs of local communities. Reference has already been made to the location of the application site close to a range of facilities, but, in addition, the Masterplan Framework identifies a site for a Local Centre to be provided, making use

of listed buildings at Lower Berse Farm and providing a range of local community facilities within walking distance of all parts of the development.

2.6.7. Community Facilities Paragraph 4.4.1. indicates that community buildings and spaces provide an important focus for sustaining communities with their presence often being a key element in in creating viable and sustainable places. As with the consideration of retail and commercial facilities above, the proposed Local Centre within the development provides the opportunity for the provision of such facilities, the potential provision of a local shop, public house, nursery, community hall and a doctors surgery have all been mentioned, and all will be considered by the Applicants, but their provision must of necessity be a matter for further consideration and discussion with the Council and other interested parties as the development details are progressed once outline planning is granted.

2.6.8. Recreational Spaces Paragraph 4.5.1. indicates that recreational spaces are "vital" for health, well-being and amenity. The Masterplan Framework identifies a network of recreational spaces throughout the development with a main area of strategic open space separating the development from Bersham, in total the development envisages the provision of approximately 23 hectares of recreation space, approximately three times the amount required by the LPA's policy.

2.7. It is clear that sustainable development is right at the forefront of the Government's strategy in relation to development, in relation to the quantification of the need for development in the first place, but also through the selection of suitable sites having regard to a range of criteria, all of which will contribute to a sustainable solution. The PPW strategy emphasises the need for these factors to all be considered in the preparation of development plans and it is very clear that this has happened in Wrexham through the processes leading to the adoption of the LDP and the allocation of the application site for development.

2.8. However, upon more detailed inspection it is also clear that the application proposals have taken on board each of the components of the sustainable strategy advocated by PPW.

2.9. The application proposal is, therefore, a suitable and sustainable development proposal, entirely in accordance with the requirements of PPW.

3. **Local Development Plan.**

3.1. The Local Development Plan (LDP) was formally adopted on 20th December 2023 when it replaced the previous Unitary Development Plan.

3.2. Sustainability is a constant theme of the LDP and the allocation of the application site for development must be viewed in this context, within the section on Plan Purpose and Background, paragraphs 1.2, 1.3 and 1.4 each refer to the purpose of delivering sustainable development.

3.3. Paragraph 1.15 describes the process that has led to the adoption of the LDP, it is explained that it has been prepared in accordance with relevant policies and informed by an extensive evidence base, stakeholder and public engagement and was subject to independent examination by inspectors before it was declared sound and subsequently adopted. The application site is a Key Strategic Site within the Plan, its selection has been informed by relevant policies which includes the National approach to sustainability within PPW to which detailed reference has already been made, it would be illogical in the circumstances to argue other than that the development of this site is seen as a suitable, sustainable and accessible site having regard to the need for development in Wrexham and the availability of alternative options.

3.4. Further information on the factors leading to the selection of the application site for development is provided later in the Plan:

- Wrexham City dominates the northern part of the County which has been one of the fastest growing retail centres in the UK over the past decade (para 1.26)

- Wrexham is well connected to most of the UK via its road and rail links and is just a 45 minute drive from major airports (para 1.28)

- Key social, economic, cultural and environmental issues are identified at paragraph 2.2

(see para 2.6 above for the PPW reference to this):

- Wrexham City should be strengthened as a key settlement of National importance with a focus, amongst other uses, for housing (2.2.1)

- Provision should be made to increase housing delivery (2.2.2)

- Accessible housing should be provided to meet the needs of the local population (2.2.3)

- There is a lack of brownfield capacity to accommodate projected growth (2.2.4)

- Transport infrastructure constraints along the A483 will need to be addressed (2.2.7)

It is clear that all of these factors have provided a context for the allocation of the application site for development and that they are considerations which relate back specifically to the sustainable approach to development set out in PPW.

3.5. The above considerations are then taken forward into the identification of a series of Strategic Objectives:

3.5.1. Policy SO1 looks to ensure that the role of Wrexham City as a National Growth Area is strengthened, the subsequent text (para 2.5) notes that Key Strategic Site allocations are part of this approach.

3.5.2. Policy SO4 identifies the need to promote active travel and the use of public transport by locating development in the most accessible locations, whilst seeking to alleviate known highway capacity constraints. The allocation of the application site has followed the application of this Strategic Objective, it is explained that the settlement hierarchy ensures development is located in the most suitable locations and new development sites are to be located, not just to meet, but to "maximise" active travel and integration with public transport opportunities.

The site is one that has the potential to meet the objectives identified, otherwise, it would not have been allocated, the highway improvements proposed in association

with the development address issues with highway capacity constraints, whilst the package of sustainable transport investment proposed by the Applicants maximise active travel opportunities and a consequent reduction in private car journeys.

3.5.3. Policy SO6 sets out the intention to promote and encourage a healthy, active and safe lifestyle, the explanation indicates the new development will be located where people can walk and cycle to a range and choice of facilities, encouraging active travel over the use of the private car, and providing high quality green infrastructure. Once again, the application proposals fulfil these objectives, the active travel measures are described in the preceding paragraph and the provision of green infrastructure in association with the development is some three times the Council's policy requirement.

3.5.4. Policy SO8 sets out the intention to ensure that all development is supported by the necessary provision of, or improvement to, infrastructure, services and facilities, provided at a time to ensure that the development is sustainable and the impact on existing communities is minimised. A range of infrastructure and facilities are to be provided in association with the development, including a local centre, open space, roads, paths and cycleways, a new school site, improvements to off-site roads and drainage infrastructure.

3.6. Once again, it is clear that the allocation of the application site has arisen following a process based on the national placemaking outcomes identified within PPW and, furthermore, the current proposal will deliver the various strategic objectives that have been identified within the LDP as appropriate for residential development.

3.7. Moving forward once again, the third section of the LDP sets out the Strategy for the Plan and the Strategic Policies, it is unsurprising that this, to some extent, repeats several of the matters set out in the preceding two sections. Nevertheless, the following points are highlighted:

3.7.1. Paragraph 3.2 indicates that the strategy of the Plan looks to balance economic aspiration with the <u>sustainable</u> [my emphasis] delivery of homes, jobs and infrastructure.

3.7.2. The Spatial Strategy of the Plan is set out at paragraph 3.3 within sustainable locations, the first bullet point refers to the Tier 1 settlement (Wrexham) and the provision of Key Strategic Sites of which the application site is one.

3.7.3. Paragraph 3.11 sets out the aspiration of putting in place a plan which will enable the delivery of more sustainable transportation solutions which it describes as integral to the overall approach, it is indicated that travel demand must be minimised along with providing a range of measures and opportunities which reduce reliance on the car. This is the approach that has been adopted in relation to the application proposal. The site itself is sustainably located such that it is in close proximity to a range of facilities that residents would be able to access on foot, by cycle or via public transport, whilst these opportunities are already available to the site, the proposals include a package of improvements which will further improve accessibility, thereby meeting the second objective of reducing reliance on the car.

3.7.4. The sustainable principles associated with minimising the impact of development on environmental assets is highlighted in paragraph 3.14 with it being emphasised that the Plan has been prepared in a way that minimises the impact on such assets, recognising the positive impact that Green Infrastructure has on biodiversity, wellbeing, amenity, sustainability and climate change.

3.8. Having set out in some considerable detail the objectives and principles that have informed the preparation of the LDP, Policy SP2 then sets out the strategy of directing development to the defined settlement limits as set out on the Proposals Map. Paragraph 3.25 confirms that the majority of development is directed towards Wrexham City where it is made clear that development:

makes the best use of existing infrastructure and services and allows homes, jobs and other facilities to be located in close proximity to each other, reducing the need to travel by car.

The Key Strategic Site allocations, including the application site, are identified at paragraph 3.26 as part of this Strategy.

3.9. Policy SP3 then goes on to specifically allocate the application site, as part of a slightly larger allocated site, for a residential led mixed use scheme with a minimum of 1500 dwellings. Paragraph 3.34 states that the site is on the edge of Wrexham City, the Primary Key Settlement in the borough which sits at the top of the sustainable settlement hierarchy, the site is opposite a protected employment site (Western Gateway) and is readily accessible to the strategic highway network and key active travel routes accessing a range of facilities within the City.

3.10. Policy SP3 refers to the need for highway improvements to address known infrastructure capacity constraints at junction 4 of the A483. The explanation refers to a Welsh Government scheme for improvements at this junction and, indeed, to other junctions on the A483, however, shortly before the Inspectors report on the LDP was published, WG accepted the recommendations of the Roads Review Panel which dropped this scheme from the programme of road improvements. However, it is clear from the Inspectors report that their support for the allocation was not dependent on the WG road scheme. As part of their submissions to the LDP Examination the Applicants had proposed alternative, more modest, road improvements that could provide the necessary additional capacity that the development required, at paragraph 7.23 of their Report the Inspectors accepted the Applicants findings and agreed that there were no capacity reasons to restrict the number of dwellings in advance of the WG improvements and in paragraph 7.24 they went further and made absolutely clear that their recommendation, whilst requiring highways improvements, was not specific to those to be delivered by WG. It is the same package of road improvements that were put forward at the LDP that are now submitted as part of the application.

3.11. When the Council adopted the LDP in December 2023, they were clearly well aware that the WG highway improvements were no longer coming forward, Policy SP3 continues to reference highway improvements, but these can only logically be those put forward by the Applicants (although the land required in order to provide the WG junction improvement is safeguarded within the development in case WG should ever wish to resurrect the proposal).

3.12. Policy T1 of the LDP addresses transport impacts, indicating that new development will be supported subject to a number of criteria, the first three of which are relevant to a consideration of the principle of development on the application site and which are commented upon as follows:

i) *Facilitate increased journeys by more sustainable modes of travel first by walking and cycling, then by public transport and finally by private motor vehicle* – as has been described, the location of the site in itself encourages more sustainable modes of transport in preference to the private car, but the package of Active Travel and public transport improvements put forward as part of the proposals will go further in encouraging residents, and other people in the locality able to benefit from the same improvements, to maximise the potential for a reduction in private car usage.

ii) *Mitigate any significant adverse effects upon the transport network that arise from the proposed development including improvements to transport infrastructure where required* - the Transport Assessment submitted with the application has considered the impact of the development on the existing transport network, both in relation to the A483 and the more local network. The LDP very clearly contemplates highway improvements where they are necessary to accommodate additional traffic and this is the approach that the Applicants have adopted within their proposals.

iii) *Do not compromise the safe, effective and efficient use of the highway network and do not have an adverse impact on highway safety or create unacceptable levels of traffic generation* – as described, the approach adopted by the Applicants has been to put forward a package of proposals that will maximise the encouragement to residents and other local people to use modes of transport other than the private car. The inference of the Policy is clear, however, in that it is also recognised that there will be traffic generation in association with new development, this should be minimised, but then addressed so that the 'safe, effective and efficient' use of the highway network is not unacceptably impacted; this is precisely the approach that the Applicants have adopted in putting forward a package of highway improvements that address the increased traffic arising from the development, but do not provide additional capacity beyond that necessary to accommodate the development.

3.13. Paragraph 4.170 goes on to confirm that:

Development growth will inevitably lead to an increase in demand for travel and place additional pressure existing transport services and infrastructure. It is essential therefore that new developments adequately provide for increased demands for travel ensuring as far as is reasonably practicable, identified negative impacts are adequately mitigated through provision of sustainable transport options and supporting highways infrastructure where considered appropriate.

This is precisely the approach that has been adopted by the Applicants, there will inevitably be increased demand for travel in association with the development, but this is addressed through a package of sustainable transport improvements in the first instance with the residual additional pressure for traffic generation only then being addressed through highway improvements.

4. **Conclusions in relation to sustainability.**

4.1. It is absolutely clear that both PPW and the LDP have sustainability objectives at their hearts.

4.2. PPW sets out a National approach to Placemaking encompassing a broad range of sustainability objectives that local planning authorities are expected to comply with in preparing their development plans and in making individual planning decisions.

4.3. There is in some respects a significant degree of duplication between the National Strategy and the Strategy set out in the LDP which takes the sustainability objectives fully on board in devising its approach to development.

4.4. The allocation of the application site for development emerges logically from this sustainable approach to development. It has been demonstrated that the application proposals fulfil all of the key sustainability objectives, this being a view held not only by the Applicants, but also by the Council who adopted the Plan, and Welsh Government who supported its adoption.

4.5. The application site is located on the edge of Wrexham where development will have maximum accessibility to existing services and facilities within the City, a package of sustainable transport proposals will further enhance accessibility by non-car modes of transport.

4.6. Whilst sustainable transport remains the priority, it is clear that new development will inevitably continue to generate additional traffic movements, the application proposal addresses this consequence and proposes infrastructure improvements that are sufficient to mitigate its own additional impact, but which will not create additional highway capacity that might encourage additional traffic movements from elsewhere.

4.7. It would be illogical to conclude in the circumstances other than that the application proposal is a highly sustainable proposal for development when tested against the relevant sustainability criteria within both PPW and the LDP.