CIVITAS
Planning Limited

Proposed Development:

16 no. affordable apartments on land at Engedi Chapel and Brymbo Methodist Church, High Street, Brymbo, Wrexham, LL11 5BL

Pre-application Consultation Report

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1.0 Introduction

1.1 In accordance with Article 1 of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (hereafter referred to as 'the Order') the Applicants (Wales & West Housing Association) have undertaken a pre-application consultation exercise in respect of the proposed planning application. The Applicant has engaged Civitas Planning Limited to act as Planning Agent.

1.2 The draft planning application proposed:

16 no. affordable apartments on land at Engedi Chapel and Brymbo Methodist Church, High Street, Brymbo, Wrexham, LL11 5BL

1.3 In accordance with the Order the proposed application was publicised locally and owner/occupiers of adjoining properties, community consultees and specialist consultees were contacted directly. In each case details were provided of how the draft application documents could be viewed and how representations could be made to the Agent acting on behalf of the Applicant and the timescale for doing so.

1.4 In accordance with the Order this Pre-application Consultation Report details the extent of the exercise, the representations received and how these have been addressed by the developer.

2.0 Formulating the Consultation Strategy

2.1 The primary aim of developing the consultation strategy was to ensure that people are consulted and provided opportunity to comment on development that will affect them.

2.2 The development site extends to 1.19ha and a total of 16 new dwellings are proposed. It is not considered that this a significantly large development proposal, but the development will have a direct impact on the occupiers of those existing dwellings that adjoin the application site and on the occupiers of the other properties in the immediate vicinity of the site.

2.3 It is considered that the level of interest in the proposal will reduce with distance from the site and that persons who are not directly impacted by the proposal will have significantly less interest in the development proposal. However, given the affordable nature of the proposed dwellings it is expected that there will be some interest in this particular social aspect from the wider community.

2.4 The relatively straightforward nature of the development has prompted the decision to wait until all draft planning application documents were available prior to undertaking consultation. The application is supported by a number of professional studies and assessments and the Applicant considers that the reports have been drafted in a manner such that those without professional knowledge of the subject areas will still be able to readily understand the content and therefore gain a sufficient understanding of the proposal.

2.5 Given the conclusions above about the significance of the proposal and those likely to be affected by it was considered appropriate to contact both adjoining occupiers and those living around the application site directly. This goes beyond the minimum extent of consultation required by the Order (adjoining owners and occupiers) but it is considered that the likely level of interest from occupiers of properties beyond those immediately adjoining warrants direct communication with each household. It is proposed that direct communication should be extended to the owner/occupiers of all properties on Tai Owens and properties located further north and south on High Street.

2.6 The Order also requires that site notices are erected. It is considered that, in addition to Notices at prominent locations on the boundary of the site, that it would also be beneficial to erect notices at the bus stops located north and south of the site on High Street in order to increase opportunity of the notice being seen by passing members of the public.

2.7 Consulting community consultees also assists with engaging the public and raising awareness of the scheme. Direct engagement with community consultees is beneficial to the consultation process. The application site lies within the Brymbo Ward and the members for the ward are Cllr Brown and Cllr Rogers. The site also falls within the Brymbo Community Council area, they too will be consulted as is required.

2.8 As set out above the timing of this consultation has been reliant on the availability of the draft application documents and ensuring that a sufficient level of information is available to allow the public to have a reasonable understanding of the whole project. As it stands, we are of the view that the documents consulted upon, albeit in draft, are sufficiently detailed to meet validation requirements were they formally submitted; the Applicant has waited until this stage to consult because we want this to be as effective a consultation exercise as possible.

2.9 In order to ensure that the consultation process is clear and transparent the formal notices will be delivered along with a covering letter that is drafted in such a manner as to encourage engagement in the process in order to gain a better and more balanced response.

2.10 The covering letter will be drafted in plain language, avoiding unnecessary reference to complicated legislation or use of acronyms. The public will be openly and warmly invited to make comments on the application at both the pre- application stage (by the developer) and the post-validation stage (by the LPA) and the difference in the varying phases of consultation will be made clear to the public.

2.11 To ensure the process is engaging for all, while the draft documents have been produced in English, all consultation notices and covering letters will be erected/sent bilingually and the Applicant has sought out a bilingual planning consultancy so that engagement in either Welsh or English can be had.

2.12 The Notices and covering letters will advise members of the public that a hard copy of the documents is available to view in the local library or that the documents are available to view in digital format and the letter will advise of the web address. The covering letter and notice will also make clear that if internet access is unavailable, and a resident is also unable to access the library then the Agent can be contacted, and best endeavours will be made to make alternative arrangements.

2.13 In addition to consulting the public and community consultees, specialist consultees will also be consulted in accordance with the requirements of the Order. These consultees are largely more familiar with the planning process and the reasons for why they are being consulted. A website link to the

documents will be provided by email, along with a copy of the requisite notice, and the covering email will introduce the proposal and provided details on how responses can be made.

2.14 The specialist consultees have been determined by reference to Schedule 4 of the Order and the following will be consulted:

Welsh Government Highways
Local Highways Authority
The Coal Authority
Dwr Cymru
Fire and Rescue Service
Clwyd-Powys Archaeological Trust

2.15 The Notices and covering letters supplied to members of the public and community and statutory consultees will advise that comments can be submitted to the Applicant's Agent via email or post at the following addresses:

- Civitas Planning Ltd c/o Bradshaws, 2 Well House Barns, Chester Road, Bretton, Flintshire, CH4 0DH
- rachel.thornley@civitasplanning.com

2.16 In the event that a person didn't have internet access at home the Notices and covering letters advise that computer facilities are available to the public at Brynteg Library, The Memorial Centre, Quarry Road, Brynteg, LL11 6AB. The Notice also set out the opening times of the library.

2.17 The draft application consists of the following documents:

Draft Application Form	
PMS23051 – Topographical Survey	
Statements	
Supporting Planning Statement	dated – May 2024
Design and Access Statement	C484-Design & Access
Highways	
Transport Statement	ref: J000488-TS01b
Pedestrian Crossing Location Review SK101	drawing no. J000488-

Ecology

Preliminary Roost Assessment and Emergence Surveys	ref: EE.4159.23.LB
Bat Mitigation Strategy	ref: EE.4159b.24.LB
Green Infrastructure Statement	ref: EE.4159.24c.LB
Proposed Lighting Layout	drawing no.577649-00
Thorlux Lighting Proposal Form	ref.577649
Thorlux Lighting Calculations	ref.577649

Drainage

Letter DCWW dated 11/05/2023	ref: PPA0007822
Initial Drainage Strategy	ref: 24033
Existing Drainage P02	drawing no. 24033/500
Proposed Drainage Scheme 24033/SK501P04	drawing no.
Impermeable v Permeable P02	drawing no. 24033/SAB-2

Ground Assessments

Phase I Preliminary Risk Assessment 7101	ref: 33326-SUT-ZZ-00-RP-G-
Coal Mining Risk Assessment Report	ref: 23WWH009/CMRA
Utility Study Level 1	ucml – dated 27/11/2023

Drawings:

Location Plan	C484-001-F
Existing Site	C484-002-F
Existing Elevations Engedi Chapel	C484-003-A
Existing Elevations Brymbo Methodist Church	C484-005-A
Proposed Site Plan	C484-006-F
Proposed Site North East Axo	C484-007-G
Proposed Site South West Axo	C484-008-G
Proposed Elevations 01	C484-013-G
Proposed Elevations 02	C484-014-G
Proposed Site Sections	C484-015-G
Proposed Site section 02	C484-016-E
Level 000 Proposed	C484-020-I
Level 001 Proposed	C484-021-I
Level 002 Proposed	C484-022-I
3d Views	C484-030-G
Gross Internal Area	C484-040-A
Net Internal Area	C484-041-A

3.0 Publicity before applying for planning permission

3.1 In accordance with 2C of the Order the Applicant publicised the proposed application by displaying a site notice, in a form substantially to like effect to the form specified in Schedule 1B to the Order, at locations on the boundary of the

site and in one other location within the vicinity of the site. These notices were in place from 3rd July 2024 to when they were removed by the Applicant's Agent on 5th August 2024. The Notices were checked periodically throughout this period and showed no signs of being tampered with and no replacements were required. Notices were placed at two locations on the site boundary, as required, but as these locations were adjacent the public highway where there is no pedestrian footway, a further notice was placed on the bus stop 35m north of the site also.

3.2 The Notice was produced in both the English and Welsh language and a copy of the Notice and a map detailing the locations in which the Notice was erected is presented at Appendix A.

3.3 In accordance with 2C of the Order the owner/occupiers of land adjoining the land to which the proposed application relates, and to a number of properties beyond the boundary with the application site, were written to and a copy of the letter is provided at Appendix B. This letter was accompanied by a copy of the Notice attached at Appendix A. The addresses to which these were hand delivered are provided in Appendix C. The notice and covering letter was also sent by post to the two landowners and to the Local Highways Department given the proposal includes works within the vicinity of the highway.

3.4 The hard copy of the documents was placed in the library on 3rd July 2024 and was available throughout the consultation period.

4.0 Consultation before applying for planning permission

4.1 In accordance with 2D of the Order community consultees and the appropriate specialist consultees were consulted.

4.2 Copies of the correspondence sent to Community Consultees is provided at Appendix D, as is a copy of the Notice provided. The Community Consultees were also provided with a web link to the draft application documents.

4.3 A copy of the email sent to Specialist Consultees is attached at Appendix E, this was accompanied by the Notice, also contained at Appendix E, which

follows the form set out at Schedule 1C to the Order. The email was sent to the following addresses, the consultees as identified at para.2.14 above:

northandmidwalesdevelopmentcontrolmailbox@gov.wales
environmentaladmin@wrexham.gov.uk*
planningconsultation@coal.gov.uk
developer.services@dwrcymru.com
flintshire.wrexham@nwales-fireservice.org.uk
trust@cpat.org.uk

**advised to use this address to contact Local Highways Authority*

5.0 Additional Consultation

5.1 In addition to the requirements to the statutory requirements of the Order the Applicant also held an in-person consultation event at the request of a local councillor.

5.2 In response to the initial consultation email of 3rd July concerns were expressed about how easy it may be for more elderly members of the public to access the documents online and a face to face event within the village would be welcome.

5.3 Wales & West Housing Association responded to the concerns raised by holding a public consultation event on Tuesday 23rd July 2024 at the Brymbo Conservative Club which lies on the opposite side of the road from the Application Site. The event was held from 3pm to 6pm.

5.4 A flyer was produced advertising the event which was delivered by hand to 15 addresses in the vicinity of the site with a further copy placed on the notice board at the Miners Arms. A copy of the flyer and the addresses can be found at Appendix F.

5.5 A digital copy of the flyer was also shared by the local councillor on the Brymbo Nextdoor webpage and on X (formally Twitter).

5.6 The event was attended by 15 members of the public and the local councillor and members of staff from Wales & West Housing Association were available to answer questions about the scheme and about social housing in general. Copies of the application documents were available, as was a Frequently Asked Questions sheet produced by the Applicant. Feedback Forms were available to the members of the public, either to fill in there and then or to take away and be completed. See Appendix F.

5.7 Provided at Appendix G is the Applicant's summary of the points that were raised at the event. The points raised will be addressed in Chapter 7.0 below. One member of the public completed a Feedback Form at the event and a copy of this is provided at Appendix I; the points raised are addressed in Chapter 7.0 below.

6.0 Responses Received

6.1 Community and Specialist Consultees were provided with a link to the application documents via email.

6.2 Representations were received from six specialist consultees who were contacted (Appendix H).

Welsh Government Highways
Local Highways Authority
The Coal Authority
Dwr Cymru
Fire and Rescue Service
Clwyd-Powys Archaeological Trust

6.3 Two responses were received from members of the public. One via email and one via a Feedback Form provided at the public consultation event. Copies of these are provided at Appendix I.

7.0 Response to representations received

7.1 In accordance with 2F of the Order this Pre-application Consultation Report details in this Chapter a summary of the issues raised and includes confirmation of where the issues raised have been addressed and if so how.

Consultation Responses from Specialist Consultees and Community Consultees

7.2 The responses received are dealt with in turn below:

Welsh Government Highway Authority

7.3 The response received advised that that the Welsh Government do not wish to comment on the proposals and the Applicant considers no action is required in response to the comments received.

The Coal Authority

7.4 The Response received identifies that the Application Site lies within a Development Low Risk Area and therefore the Coal Authority had no specific comments to make other than to direct the Applicant to the Standing Advice. The site has been subject to a Coal Mining Risk Assessment which has established that the site is suitable for residential development post completion of appropriate mitigation measures to which the Applicant is committed. It is therefore considered that no further action is required in respect of this consultation response.

Dwr Cymru

7.5 In relation to surface water drainage Dwr Cymru advise engagement with the SuDS Approval Body and that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system. The Applicant considers that the proposed drainage scheme addresses the comments raised in respect of run-off and once the scheme is agreed in principle with the SAB, will liaise further with Dwr Cymru as required.

7.6 In respect of foul drainage Dwr Cymru has advised that there is capacity within the public sewerage system, have specified where the connection should be made and that additional consents may be required. The Applicant is satisfied

that the comments can be readily accommodated within the foul drainage scheme proposed.

7.7 Dwr Cymru has identified that a number of planning conditions are likely required to control the delivery of drainage and water supply on site and the Applicant is content to accept all the planning conditions identified.

Fire and Rescue Service

7.8 The Fire and Rescue Service have advised they have no objection to the proposed development and direct the Local Planning Authority to the current standing advice. They direct the Applicant to the requirement to provide adequate water supplies and vehicle access for firefighting purposes and the Applicant considers the proposal will be compliant.

Heneb: The Trust for Welsh Archaeology – Clwyd-Powys Region

7.9 Albeit not a statutory consultee the archaeology trust were consulted on the advice of the Local Planning Authority.

7.10 The consultation response advises that they consider the Methodist chapel complex which includes buildings of 1861 and 1840 as being of at least a local historical and vernacular interest and it is recommended that a pre-determination evaluation which includes a Level 3 Archaeological Building Recording completed by a registered Archaeological Contractor inform a decision on appropriate mitigation.

7.11 The Trust considers that without this study it is impossible for frame an appropriate archeological response as to how damaging destruction of any archaeological features within the buildings may be.

7.12 The Trust have advised that the Applicant will need to engage a CIfA approved archaeological contractor to complete this work in accordance with an approved written scheme of investigation (WSI) which will be supplied by the archaeological contractor and approved by the Trust in advance of commencement of the investigation and have provided guidance documents to assist the Applicant.

7.13 The Applicant has instructed Level 3 Archaeological Building Recording completed by a registered Archaeological Contractor in response to the comments received.

Local Highways Authority

7.14 The consultee response from the Local Highways Authority advised that they had no objections in principle to the proposals but raised concern in respect of

- the visibility splays
- pedestrian access
- cycle parking
- car parking off Tai Owen

7.15 The Applicant remains firmly of the view that 16 parking spaces is an appropriate level of provision based on their operating experience as a Housing Association and the uptake of parking provision and level of car ownership across their portfolio. The proposed site layout has been revised however in response to the comments received about the two spaces access from Tai Owen.

7.16 The two accessible spaces are located at the approximate location of the existing dropped kerb access to the south of the Chapel building. It is proposed that this dropped kerb be extended and the boundary wall angled to provide significantly improved visibility and pedestrian intervisibility. The existing access provides c.7m visibility form a 2m setback (measured to the centreline of the narrow existing carriageway) whereas the proposed spaces would have 13m visibility and 9m visibility (if both spaces are occupied). Vehicles existing driveways would edge out carefully as in any parking situation, including as they would in the present arrangement and it is therefore considered that the revisions to the scheme make this arrangement appropriate.

7.17 The LHA also expressed concerns over the visibility splays from the undercroft parking area. Whilst it is acknowledged that typically visibility splays should be measured to the nearside kerbline, the measurement of the northbound visibility splay to the centreline of the carriageway is considered acceptable in this instance noting that the narrow nature of High Street is such that the overtaking of vehicle is not possible. Accordingly, all vehicles approaching from

the north would be visible from a 25m distance of the access, given the above the arrangement is considered acceptable based on the recorded 85th percentile speeds and that removal of the existing site boundary wall/vegetation would improve forward visibility along High Street.

7.18 The highways authority also raised concerns about the level of proposed cycle parking. The Applicants have significant experience of operating similar premises, and their first-hand knowledge is that bike ownership among their tenants is low, thus fewer spaces are proposed. The Applicants can provide evidence of uptake if necessary.

7.19 The proposed width of the footway has been increased to a width of 1.8m at the narrowest point along the length. While this falls short of the requested 2m width, this width is viable and achievable given the constraints of the site.

7.20 Finally, the Highways Authority comments on drainage have been noted and drainage across the private access drive will be installed given the fall toward the adopted highway.

Councillor Gary Brown

7.21 The response received from Cllr Brown advised that he is supportive of the principle of development and that the accommodation of this type is needed in Brymbo. Cllr Brown identified that concerns had previously been raised in earlier applications about parking provision and pedestrian access but that the current proposals address these. He did however make a number of observations/suggestions:

- The existing car park at Tai Owens is regularly full and residents are concerned that visitors to the new Engedi development would worsen this situation. Is there a potential to increase overflow car parking provision in the proposed landscaped areas?
  Response – signage at the entrance to the Tai Owens access road advises that parking is for residents and visitors only and the Applicant obviously isn't in a position to police this but has ensured, through orientation of the proposed development and the location of the entrances to the buildings that they actively encourage or suggest that the car park at Tai Owens is available to residents.

Parking provision is proposed at a rate of one car parking space per dwelling and it is known from the Applicant's considerable experience of the operation of such affordable dwellings that car parking uptake is not at this level as car ownership levels are lower. We therefore don't consider that provision of additional parking spaces is necessary and we wouldn't want to compromise the ability to provide soft landscaping when the site is site constraints already restrict the capacity to do so.

- It would be helpful to continue the footpath along the whole site frontage avoiding the need for pedestrians to cross from the western side of the public highway to east, only to have to cross again to access the bus stop on the western side of the carriageway.
  Response – the footway has been extended along the boundary where possible, but extending for the entire length of the boundary is not possible due to a requirement for significant retaining structures that would cause further site constraint and effect the project viability.

- Public realm improvement to access route to Tai Owens e.g. stonework repairs, vegetation improvements and signage.
  Response – as noted by Cllr Brown this area lies outside the Applicant's control and so they cannot directly influence this, however it is considered that the proposed development and the associated landscaping will improve the relationship of the developments and have a visual and aesthetic benefits for the shared boundary.

Consultation Responses from members of the public

7.22 Two responses were received from members of the public that raised a range of matters. The principle of development was welcomed in one response, but a number of concerns were raised in both responses. The Applicant has considered the comments raised and a response to each of the matters is provided in the table below.

7.23 Also addressed in the table below are areas of concern that were raised in person with the Applicant at the face-to-face event held on 23rd July 2024 (see Appendix G).

Issues raised	
Development density – 16 apartments (32 person capacity) is too great.	The Application Site carries a number of constraints that affect the ability to redevelop the previously developed land and in order to be an economically viable proposal this level of units is required.
Proposed height – although the same as the existing height, the height will be maintained over a much larger footprint and will be a dominating presence out of keeping.	The Applicant does not agree, we think that as the building we orientated differently and with a hipped roof it will not be as visually prominent in the street scene as the existing Engedi Chapel. The proposed smaller block at the southern end of the site will also help with breaking up the massing of the development to open up the streetscene.
Overlooking – particularly with reference to the bathroom window of the property opposite	The window in question is obscure glazed so there are no direct views into the property opposite and we understand it serves a bathroom. Through careful design, across the site sufficient separation distances are maintained.
Insufficient outdoor amenity space	The Applicant acknowledges that the provision of outdoor amenity space is below standard. As set out in the Supporting Planning Statement, the site is significantly constrained and to do so would render the proposal unviable.
Highway safety – additional movements cannot be accommodated on the existing busy High Street	The Application proposal has been subject to highways assessment and the professional view of the consultant is that the proposed increase in movements will not result in unacceptable highways impacts.
Insufficient parking provision	Parking provision is proposed at a rate of one car parking space per dwelling and it is known from the Applicant's considerable experience of the operation of such affordable dwellings that car parking uptake is not at this level as car ownership levels are lower amongst residents of such properties.

Alternative proposal – consider that 2/3 bedroomed homes would be better for of development	The application proposes 1-bed apartments because the evidence demonstrates that there is greatest need for properties of this scale. Indeed there are currently more than twice this number of people on the Housing Register in housing need of a 1-bed property and a preference for a property within this estate office area.
Concerns that 1 bedroom flats may mean temporary accommodation	1 bedroom apartments are proposed because there is strongest evidence of need for this scale of unit locally. The units will be allocated in accordance with the Council's scheme of allocation.
Drainage – impacts on properties opposite	At the in-person event particular concern was expressed regarding flooding and pre-existing issues that affect properties on the opposite side of the public highway. The concern is that the location of the access road will increase surface water run-off. This will be raised with the Applicant's Drainage Engineer to ensure this has been appropriately considered in the proposed drainage scheme. It should also be noted however that the consultation response from Dwr Cymru states that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system. The Highways Authority has also stated that acro drains or similar are necessary given the fall toward the public highway.
Access – concerned at sloped entrance and it being hazardous in ice and snow and directly opposite an existing dwelling.	The proposed access arrangements have been through a thorough design and development process and subject to review by the appropriate professional consultants. The proposal consulted upon had a maximum gradient of 1:12 and will be appropriately surfaced to a high standard to ensure highway safety in poor weather conditions. The Highway Authority has required that acro drains or similar are installed given the fall toward the public

	highway and this will be included in the proposal.
Materials – galvanized bars to undercroft parking area and fire escape are not in keeping	The matter of the bars has already been raised with the architects and an alternative treatment which appears less hostile will be sought for the final application proposal. The Applicant doesn't agree however that the external staircase will be visually prominent given its position to the side of the property. One-way doors will be in use however to ensure that the staircase is available only in emergency and doesn't facilitate access into the building to ensure its not a congregation point leading to anti-social behaviour issues.
Heritage – the design should be more sympathetic and re-use materials from the existing chapel	Re-use of materials/salvage of heritage features and their inclusion in the proposed scheme is something that has been considered by the Applicant in discussion with their architect and landscape architect and potential locations for reusing existing materials like reclaimed stonework and date stones have been considered as part of the proposals.
Closure of the High Street for construction works	The road will only be closed when absolutely necessary, this will be agreed through the appropriate channels with prior notice given.
Construction compound	Queries have been raised about where materials etc will be stored when construction is taking place. A schedule of works will be devised with the contractor who will find a suitable option with the Tai Owens car park or Conservative Club car park being potential options they may look at.
Demolition dust	Best practice will be followed during demolition to reduce dust emissions and in the event that excessive dust/mess/noise was created the Applicant would take steps to engage with those affected and agree a solution.

Asbestos	Concerns were raised about disruption of asbestos during demolition. The Applicant will ensure appropriate measure are taken relating to safe demolition, protection of contractors and members of the public including the necessary surveys to establish the appropriate risks and mitigation required.

7.24 As is set out in the table above, the draft proposals have been guided by professional assessments and advice received. In relation to the matters raised during consultation it is considered that these can be appropriately addressed through modest amendments to the proposal prior to formal application.

8.0 Conclusions and Feedback

8.1 This site and the application proposal have now been the subject of public consultation. Comments were received from local residents, community consultees and specialist consultees.

8.2 Following the receipt and review of comments made the Applicant will be making a number of amendments to the proposal to address the concerns raised.