

PLANNING, DESIGN AND ACCESS STATEMENT

Land at Stansty Fields, Mold Road, Gwersyllt, Wrexham

Prepared on behalf of

The Applicant – Castle Green Homes

December 2022



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1 INTRODUCTION

- 1.1. This Statement has been prepared by Grimster Planning on behalf of our Client, Castle Green Homes (hereafter referred to as the “Applicant”).
- 1.2. The Statement is submitted in support of a detailed planning application (hereafter referred to as the “Application”) submitted to Wrexham County Borough Council for the proposed development of Land at Stansty Fields, Mold Road in Gwersyllt, Wrexham (hereafter referred to as the “Site”).
- 1.3. The description of development for which detailed planning permission is sought comprises the following:

“Residential development at Land at Stansty Fields, Mold Road, Gwersyllt, Wrexham, LL11 4AX”

- 1.4. The Application comprises a number of supporting plans and drawings, and technical reports, which should be read alongside this Statement as documented in *Table 1* below:

Table 1: Application Package

Technical Report	Author	Reference / Date
Location Plan	Castle Green Homes	MRGWR-LP.01
Site Layout	Castle Green Homes	MRGWR-SP.01 Rev. D
House Types	Castle Green Homes	Various
Topographical Survey	Carl Williams Land Surveys	B444-00.01
Landscape Plans	Ascerta	P.1626.22.03 Rev. A and P.1626.22.04 Rev. A
Transport Statement	SCP	November 2022
Arboricultural Impact Assessment	Ascerta	April 2022
Flood Consequences Assessment and Drainage Strategy	Coopers Consulting Engineers	November 2022
Drainage Strategy	Coopers Consulting Engineers	7956 / SK01 Rev. D
Preliminary Ecological Appraisal	Ascerta	March 2022

- 1.5. In accordance with the statutory requirements set out in Welsh Government Guidance, the Applicant has undertaken pre-application consultation for the proposed ‘major’ development (by virtue of its scale in excess of ten dwellings).

- 1.6. To guide this process, the Applicant has established a dedicated website on which to make details of the proposed development and the aforementioned Application documentation available to view <https://planning.castlegreenhomes.uk>. In accordance with the statutory guidelines, the Applicant has also issued formal correspondence to consultees and adjoining landowners, and advertised/displayed detailed of the Application by way of a site notice. Further details, including the feedback/comments received and how these have been addressed by the Applicant, will be documented in the Pre-Application Consultation Report submitted with the Application.

2 SITE CONTEXT

- 2.1. This Section of the Statement provides details of the Site, namely its location, description, and locational sustainability.

Site Location

- 2.2. The Site lies within the administrative area of Wrexham County Borough Council.
- 2.3. The location plan of the Site is provided at *Figure 1* below:

Figure 1: Location Plan



Source: Site Location Plan Drawing Ref. MRGWR-LP.01

- 2.4. The Site is located at the south-eastern edge of the settlement of Gwersyllt, which is identified as an Urban Village in Wrexham County Borough Council's adopted Unitary Development Plan, and a Key Settlement in the Council's emerging Local Development Plan.

- 2.5. As a settlement, Gwersyllt benefits from very good connectivity to Wrexham Town via the highway network, the centre of which lies c. 2.2km from the Site.
- 2.6. In respect of its surroundings, the eastern boundary of the Site is formed by vegetation/trees, beyond which lies the railway line. To the north lies existing residential development on St Giles Park.
- 2.7. To the west of the Site lies the A541 Mold Road. The land to the south is agricultural in nature, separated from the Site by an existing hedgerow/tree belt.
- 2.8. There are existing and well-established hedgerows at all boundaries of the Site which provide for a strong sense of containment; these lend the Site to development. The existing landscape features will be retained as much as possible, albeit some small-scale removal is required to facilitate the proposed development as documented later in this Statement. Compensatory planting will be provided as part of the proposed development as shown on the submitted Landscape Plans.

Site Description

- 2.9. The net Site area extends to 2.68 hectares (gross 3.13 hectares). It comprises a single agricultural field used for grazing purposes.
- 2.10. Vehicular access to the Site is currently available via the land/field to the south. Future direct access into the Site will be provided via the creation of a new vehicular and pedestrian access from the west off Mold Road, designed to adoptable standards. The proposed site access is located at the point where the speed limit on Mold Road increases to 50mph, with street lighting and footways to facilitate safe vehicular and pedestrian movements. The speed limit to the north of the Site is reduced to 40mph on the exit from St Giles Park roundabout.
- 2.11. The topography of the Site has been taken into account in the preparation of the Site Layout.
- 2.12. The Site lies wholly within Flood Zone A and thus is deemed to be at low risk of flooding.
- 2.13. The Site is not located within a Conservation Area.
- 2.14. The nearest heritage assets to the Site are:
 - **Lower Stansty Farmhouse**, a Grade II listed building located c. 200m to the south-east of the Site at its nearest point; and
 - **Stansty Park with Garden Gateway**, a Grade II heritage asset located to the west of the Site, beyond Mold Road.

- 2.15. There will remain a permanent physical and visual separation between the proposed development and these heritage assets post-development (owing to intervening vegetation, infrastructure, topography (which gradually slopes down from west to east), landform/land-uses and the proposed layout). Accordingly, it is not considered that the proposed development of the Site would cause harm to the setting and significance of these 2 no. heritage assets.
- 2.16. There is no tree coverage within the developable area of the Site. The Site boundaries currently comprise established hedgerows and trees as shown on Drawing Ref. P.1626.22.01 included at Appendix 2 of the accompanying Arboricultural Impact Assessment (AIA). All trees at the periphery of the Site are protected by Tree Preservation Order No. 130 (2008), and Tree Preservation Order No. 155 (1995).
- 2.17. There is an existing footpath along the western boundary of the Site on Mold Road. The proposed new Site access will comprise 3m cycle/footways to provide a safe connection to this existing footway network to the west (which is the direction that the majority of people will travel for local services). There are no existing Public Right of Ways across or adjacent to the Site.

Locational Sustainability

- 2.18. In order to appraise the locational sustainability of the Site, we have considered the location of the Site relative to the everyday needs of future residents and access to key services. Further details are provided in Section 4 of the accompanying Transport Statement.

Access to Education

- 2.19. The catchment Primary School to the Site is Gwersyllt Community Primary School located in a north-easterly direction from the Site on Dodds Lane. It lies c. 1.3km from the Site via Mold Road, Hope Street and Dodds Lane. The proposed footpath connections from the Site linking to the existing footpath on Mold Road will provide for safe pedestrian movements to and from the Site to the School and the wider area.
- 2.20. The nearest Secondary School to the Site is Ysgol Bryn Alyn located on Church Street in Gwersyllt, c. 1.2 km from the Site.
- 2.21. Overall, the Site benefits from excellent access to primary and secondary education, and which is accessible via sustainable modes of travel.

Access to Shops and Services

- 2.22. There are a number of shops in Gwersyllt, including those at Gwersyllt Retail Park on Dodds Lane, c. 1.2km from the Site. Available retail provision includes a supermarket, convenience stores, coffee shop, Post Office, restaurants/take-aways, and hair and beauty amongst others. Gwersyllt also benefits from public houses, a petrol filling station and places of worship.
- 2.23. Overall, the Site benefits from good access to local facilities to serve the everyday needs of future residents.

Access to Public Transport

- 2.24. The nearest bus stops to the Site are located along Old Mold Road, approximately 250m walking distance to the west of the Site access. The nearby bus stops are located within the recommended walking distance of 400m. The bus stops are served by the No. 27 bus services which runs hourly Monday to Saturday between approximately 6.30am and 6.30pm.
- 2.25. There is an existing railway station in Gwersyllt, located c. 0.9km from the Site along Mold Road and Hope Street. This station provides daily services to Wrexham Central and Bidston, via Buckley and Hope, from where onward connections can be made. A reduced service operates in the evening, weekends and bank holidays.
- 2.26. Further details of public transport services can be found in Section 4 of the accompanying Transport Statement.

Access to Healthcare

- 2.27. There are existing medical centres/GP practices and dental surgeries in Gwersyllt/Summerhill to provide healthcare services to local residents.
- 2.28. Furthermore, there are existing dental practices in Gwersyllt.

Access to Leisure / Recreation

- 2.29. The Gwyn Evans Leisure and Activity Centre is located c. 2.1km from the Site, in a northerly direction, on Heol Cefn. This provides access to a swimming pool, gymnasium and sports hall.
- 2.30. Stansty Park lies to the west of the Site, beyond Mold Road, which is publicly accessible.

- 2.31. The nearest existing equipped area of play to the Site can be found to the immediate north-east, accessible on foot off St Giles Park within a short walking distance via Mold Road. This will complement the public open space to be provided as part of the proposed development.
- 2.32. Overall, the Site enjoys excellent access to leisure and recreation facilities within an accessible distance, and which together offer a significant health and well-being benefit to future residents of the proposed development.

Summary

- 2.33. Overall, the Site benefits from excellent sustainability as confirmed in Section 4 of the accompanying Transport Statement. It's proposed housing allocation in the emerging Replacement Local Development Plan, as documented later in Section 5 of this Statement, is a further demonstration of its suitability and sustainability for the proposed land-use and scale of development proposed as part of this Application.

3 PLANNING HISTORY

- 3.1. There is no planning history associated with the Site which is relevant in the determination of this Application.

4 PROPOSED DEVELOPMENT

- 4.1. This Section of the Statement provides details of the proposed development for which detailed planning permission is now sought.

Use

- 4.2. This Application seeks detailed planning permission for the following:

“Residential development at Land at Stansty Fields, Mold Road, Gwersyllt, Wrexham, LL11 4AX”

Amount

- 4.3. The proposed development will comprise 96 no. dwellings (Use Class C3), including 24 no. affordable homes (25%).
- 4.4. There will be a sub-station located to the west Plot 96, and a pumping station to the east of Plot 52, screened appropriately. Further details are shown on Drawing Ref. MRGWR-SP.01 Rev. D submitted for approval.

Housing Mix, Density and Floorspace

- 4.5. The proposed development will comprise the following housing mix:

Affordable Housing

- 16 no. 2-bed semi-detached terraced properties;
- 6 no. 3-bed end terraced properties; and
- 2 no. 3-bed semi-detached properties.

Market Housing

- 4 no. 2-bed mid-terraced properties;
- 4 no. 3-bed end-terraced properties;
- 14 no. 3-bed semi-detached properties;
- 21 no. 3-bed detached properties; and
- 29 no. 4-bed detached properties.

4.6. The affordable housing shall be provided on the following plots, as shown on Drawing Ref. MRGWR-SP.01 Rev. D:

- Plots 11 to 19;
- Plots 31 to 39;
- Plots 52 to 55; and
- Plots 64 to 65.

4.7. The proposed net density across the Site will be 35.89 dwellings per hectare.

4.8. The cumulative net footage across the Site will equate to 3,556.16 square metres per hectare. The total combined proposed floorspace of the 96 no. dwellings will equate to 102,394 square feet.

Scale and Massing

4.9. The proposed dwellings will all be a maximum of two-storeys in height, reflective of the typical prevailing local character found to the immediate north of the Site.

4.10. The proposed mix of dwellings (as set out in paragraph 4.5 above) allows for a layout such that it does not create issues of massing which would be out-of-keeping with the local character.

Layout

4.11. The proposed Site Layout is shown on *Figure 2* below.

Figure 2: Proposed Site Layout



- 4.12. The Site Layout has been designed as a sympathetic and logical extension to the settlement, to the south of existing residential development on St Giles Park, and Mold Road to the west. It comprises a naturally contained parcel of land.
- 4.13. The Site Layout has taken account of the topographical characteristics of the Site such that all of the proposed dwellings will be no more than 2-storeys in height.
- 4.14. Plots 5 to 10 and 91 to 96 will positively address the proposed internal access road at the Site entrance off Mold Road. The only properties that front on to Mold Road are plots 1 to 4, albeit these are set back from Mold Road and served by an internal private drive off the main access road. This will minimise any issues relating to road noise/pollution and amenity for future occupants.
- 4.15. The layout has been designed to provide for the efficient use of the land to deliver 96 no. new homes, with a number of private gardens backing on to the northern and southern Site boundaries to ensure that properties are inward looking and thus positively address the street scene.
- 4.16. There is some limited use of private driveways throughout the Site. These align with the Council's standards.

- 4.17. The affordable homes have been pepper-potted throughout the proposed development, and these properties will be indistinguishable in their appearance from the open market homes.
- 4.18. The house and plot sizes are reflective of the local character, incorporating a mix of terraced, semi-detached and detached properties.
- 4.19. The layout has respected the Council's required separation distances and has sought to avoid any issues of overlooking/loss of privacy consistent with the Council's spacing standards.
- 4.20. Consideration has also been given to the Secured by Design principles to inform the proposed Site layout and boundary treatments. Accordingly, the proposed dwellings have been designed/orientated such that there is the opportunity for natural surveillance from properties. This includes the overlooking of the proposed public open space towards the eastern boundary of the Site from plots 45 to 51.
- 4.21. Details of the street lighting to be provided within the Site can be dealt with by way of a pre-occupation condition attached to any grant of planning permission.
- 4.22. The Site Layout has sought to retain as many existing trees and hedgerows as possible, consistent with the Local Development Plan. However, in order to accommodate the proposed development, including the proposed Site access, a small number of trees and hedgerows (including just some partial loss) will need to be removed as documented in Table 1 of the accompanying AIA. Further details are also provided in Section 6 of this Statement. The loss of these trees will be compensated for through replacement planting as shown on the submitted Landscape Plans.

Materials and House Types

- 4.23. *Figure 3* below provides examples of the proposed house types to be delivered across the Site; further details, including floorplans, are provided as part of the submitted drawing package.

Figure 3: Proposed House Types



House Type: 4P2B Elevations



House Type: 5P3B 4P2B Elevations



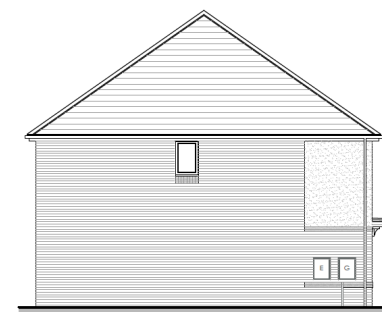
5P3B END
FRONT ELEVATION



5P3B END AS
SIDE ELEVATION



5P3B END AS
REAR ELEVATION



5P3B END AS
SIDE ELEVATION

House Type: 5P3B Semi Elevations



FRONT ELEVATION
HB1



SIDE ELEVATION
HB1

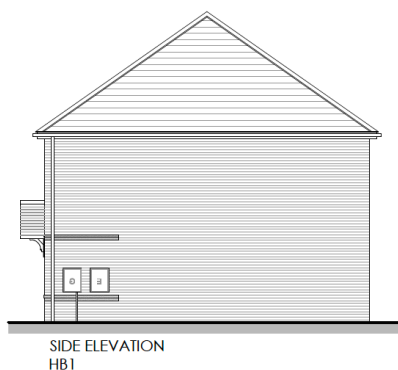
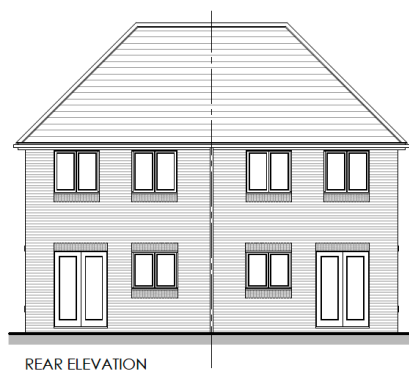


REAR ELEVATION

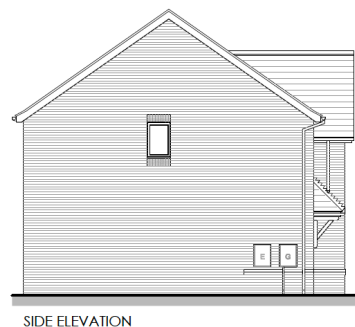


SIDE ELEVATION
HB1

House Type: Highfield/Oakley 3 Block Elevations



House Type: *Highfield Semi Elevations*



House Type: *Marlow Semi Elevations*



FRONT ELEVATION

SIDE ELEVATION



REAR ELEVATION

SIDE ELEVATION

House Type: Oxford Elevations



FRONT ELEVATION

SIDE ELEVATION



REAR ELEVATION

SIDE ELEVATION

House Type: Henley Elevations



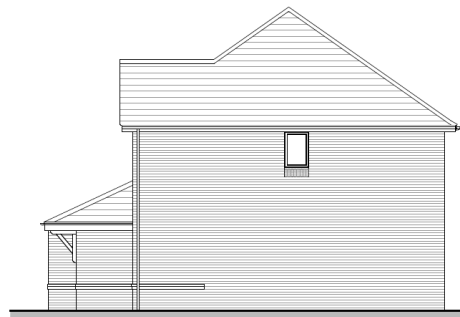
FRONT ELEVATION



SIDE ELEVATION



REAR ELEVATION

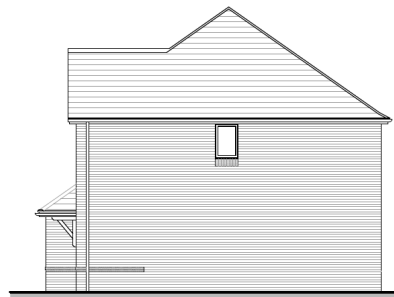


SIDE ELEVATION

House Type: Evesham Elevations



FRONT ELEVATION



SIDE ELEVATION



REAR ELEVATION



SIDE ELEVATION

House Type: Beaumont Elevations



House Type: *Wentworth Elevations*

- 4.24. The palette of materials proposed by the Applicant comprise facing brickwork with contrasting details and some render. Roof materials will likely include the use of slate-coloured concrete tiles. The palette of materials has been carefully considered with a view to ensuring a high-quality design which responds to the placemaking aspirations set out in the Local Development Plan (adopted and emerging) and PPW11.
- 4.25. Confirmation of the full and final materials palette can be dealt with by way of a pre-commencement planning condition(s) attached to any planning permission.

Landscaping and Public Open Space

- 4.26. Landscape plans (Drawing Ref.'s 1626.22.03 Rev. A and 1626.22.04 Rev. A) have been prepared and are submitted with the Application; these illustrate the ability and commitment to provide new and compensatory tree and hedgerow planting across the Site. This will include native planting, ornamental planting, wildflower seeding, as well as turfed private gardens.

- 4.27. As documented earlier in this Statement, public open space will be provided towards the eastern edge of the Site, extending to 0.36 hectares. This will include an attenuation basin as part of the surface water drainage strategy.
- 4.28. The proposed boundary treatments include 1.8m high timber close boarded fences between properties, as well as a 1.8m high screen wall/fences between some of the plots (primarily on the corner plots) as delineated on the submitted Site Layout.

Accessibility

- 4.29. Vehicular (and pedestrian/cycle) access into the Site will be created from Mold Road. This will serve as the only point of access into the Site. The visibility splays at the proposed Site access will be 4.5m x 120m as shown on Drawing Ref. SCP/220743/SK01 provided at Appendix B of the accompanying Transport Statement. The access arrangements have been designed to allow left and right turns out from the Site, with left turn into the Site only from Mold Road. A separate right turn lane will be provided along the central reserve in order to allow vehicles to turn right from the proposed Site access onto Mold Road (northbound).
- 4.30. The proposed access will include a 5.5m carriageway with a 3m combined cycle/footway on the northern and southern sides of the access road, designed to adoptable standards. These will link to the existing cycle/footway network on Mold Road. The internal footways provided at the entrance to the Site will provide for the safe movement of pedestrians and to encourage non-car travel in view of the Site's locational sustainability and access to public transport services as documented in Section 2 of this Statement. This includes connecting to the existing footway network on Mold Road, providing a safe and traffic free link to local Schools and services, including public transport.
- 4.31. The road widths, including the features junction and private driveways, have been designed such that the proposed development is accessible via refuse vehicles and emergency vehicles. Swept path analysis has been undertaken to inform the proposed Site layout, details of which can be found in Section 3.4 and Appendix C of the accompanying Transport Statement.
- 4.32. The use of dropped kerbs and tactile paving will assist footpath users and cyclists of all abilities, ensuring that the proposed development is accessible to all. The proposed development and house types have taken account of the Council's guidance, and will ensure access for people of all abilities, as well as the safe movements of pedestrians and cyclists.
- 4.33. The proposed development will comprise a mix of side and front off-road parking consistent with the Council's standards set out in LPGN16. Some of the proposed house types will also benefit from integrated garage space (namely the Evesham, Beaumont and Wentworth).

Waste and Recycling

- 4.34. Each of the proposed dwellings will have its own private bin storage area to aid waste collection and recycling.
- 4.35. As outlined above, vehicle tracking has been undertaken as part of the accompanying Transport Statement to ensure that the internal road system can accommodate the safe manoeuvring of refuse vehicles. This has demonstrated that a refuse vehicle can enter and leave the Site in a forward gear, as shown in Appendix C of the accompanying Transport Statement.

Surface Water and Foul Drainage

- 4.36. The proposed development will incorporate the following drainage measures, as documented in the accompanying Flood Consequences Assessment (FCA) and Drainage Strategy, and shown on Drawing Ref. 7956 / SK01 Rev. D:
- **Surface Water** – the Site does not benefit from any existing drainage and will rely on infiltration and surface water run-off to dispose of surface water flows. The flows will follow the topography towards the eastern edge of the Site towards the watercourse located outside of the Site boundary. There is no site investigation report available at this time; as such, the surface water drainage strategy has been developed based on the Site being underlain with clay. This will provide a flow rate of 15.7l/s and would require an attenuated surface water design before flows are passed forward to the watercourse at a restricted flow rate. The surface water drainage strategy presented as part of this Application (and at Appendix 1 of the accompanying Flood Consequences Assessment) is providing all attenuation within a SuDS basin at the end of the network with a hydro brake flow control device to restrict the flows. Incorporation of additional source control SuDS components such as water butts, permeable paving and bio retention will need to be considered further at the detailed design stage; and
 - **Foul Water** – it is proposed to discharge all foul flows into the foul gravity network within St Giles Park to the north of the Site. A gravity connection will not be achievable and therefore a foul pumping station is proposed at the south-eastern edge of the Site allowing flows to be pumped along a rising main to a suitable discharge point within St Giles Park foul public sewer network.
- 4.37. A SuDS Maintenance and Management Plan should be produced to outline the activity and frequency of inspections and maintenance works required on any SuDS components subject to SAB approval/adoption.

Environmental Sustainability

- 4.38. The proposed development has the potential to generate sustainability benefits. The sustainable location of the Site and the availability of alternative modes of transport, together with the pedestrian and cycle permeability offered within the Site, should encourage non-car travel. Likewise, the new tree and hedgerow landscaping to be delivered as part of the proposed development has the potential to make a positive contribution to the biodiversity value of the Site over time.
- 4.39. As a long-established North Wales housebuilder, the Applicant promotes energy efficiency within their homes; indeed, on average these are six times more efficient and generate over 60% fewer carbon emissions than older properties. As a commitment to energy efficiency, features include efficient heating systems, double glazing, insulated flooring, and a high standard of roof and wall insulation.

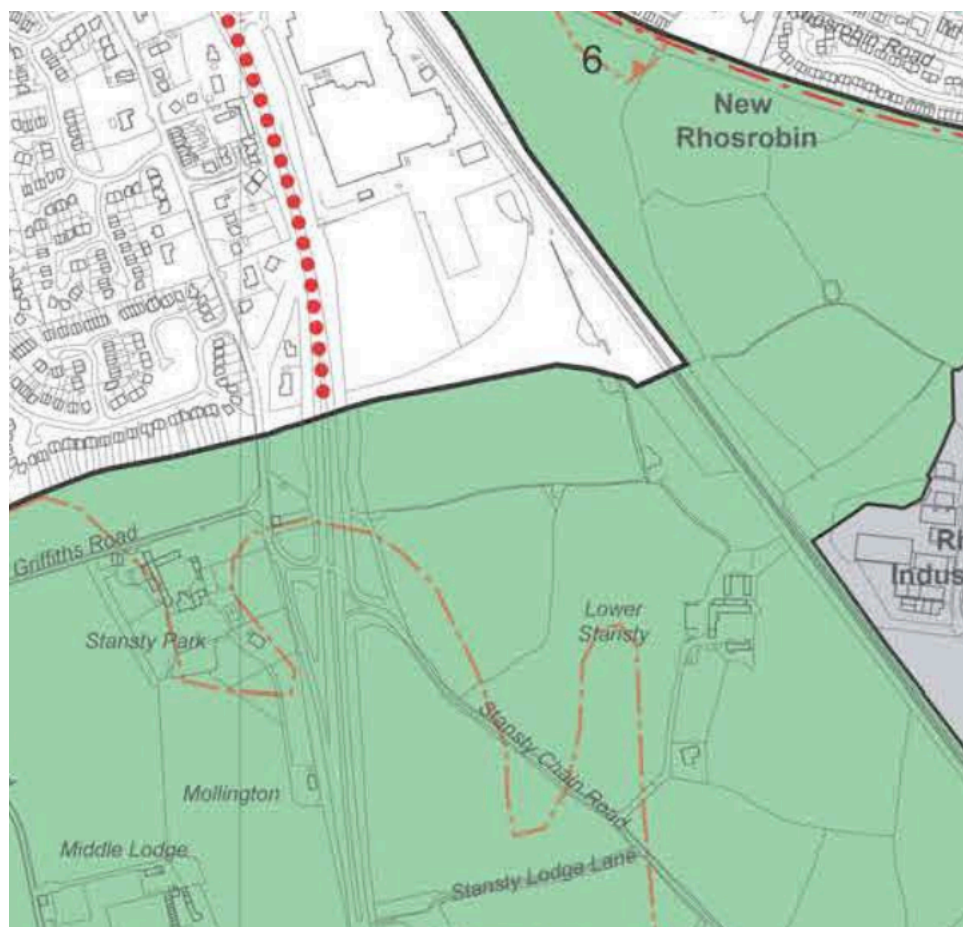
5 PLANNING POLICY CONTEXT

- 5.1. For decision-taking, Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that if regard is to be had to the development plan for the purposes of determination, then that determination must be made in accordance with the development plan unless material considerations indicate otherwise.
- 5.2. This requirement of planning law is re-iterated in Paragraph 1.21 of Planning Policy Wales 11 (“PPW11”) published in February 2021.
- 5.3. Accordingly, we set out the relevant development plan and any other material considerations relevant to this Application below:

Local Development Plan

- 5.4. The adopted development plan for the purposes of this Application comprises the following:
- Wrexham Unitary Development Plan covering the period 1996 to 2011 (adopted in 2005);
 - Wrexham Unitary Development Plan Proposals Map.
- 5.5. The adopted UDP is now time-expired, and thus the weight to be afforded to the policies will depend on the consistency of the LDP with PPW11.
- 5.6. The Site is located at the south-eastern edge of the settlement of Gwersyllt, which is identified as an Urban Village the UDP.
- 5.7. On the adopted UDP Proposals Map, the Site is identified as lying within the Green Barrier under Policy EC1, outside but adjacent to the settlement boundary of Gwersyllt:

Figure 4: Adopted Unitary Development Plan Proposals Map Extract



Adopted Local Development Plan

- 5.8. In addition to those policies cited above, the following adopted UDP policies are considered to have some relevance in the determination of this Application (subject to their degree of consistency with PPW11 and the weight to be applied to them), and are considered further in Section 6 of this Statement:

Table 2: Relevant Unitary Development Plan Policies

Policy Reference	Policy Title
CLF5	Open space requirements from new residential development
EC2	Agricultural Land
EC6	Biodiversity Conservation
EC4	Hedgerows, Trees and Woodland
EC12	Development and Flood Risk
EC13	Surface Water Run-Off
GDP1	General Development Principles
GDP2	Capacity of infrastructure and community facilities
H5	Housing in the Countryside

H7	Affordable housing within new developments
PS1	The Broad Location of Development (and PS2-PS12)
T8	Parking
T9	Walking, Cycling and Horse Riding Routes

- 5.9. Guidance from Welsh Government published in a letter dated 24th September 2020 confirms that in the absence of an up-to-date LDP, plans adopted prior to 4th January 2016 will remain the LDP for determining planning applications until replaced by a new LDP.

Replacement Wrexham Local Development Plan

- 5.10. To date, Wrexham County Borough Council has made the following progress on its Replacement LDP:

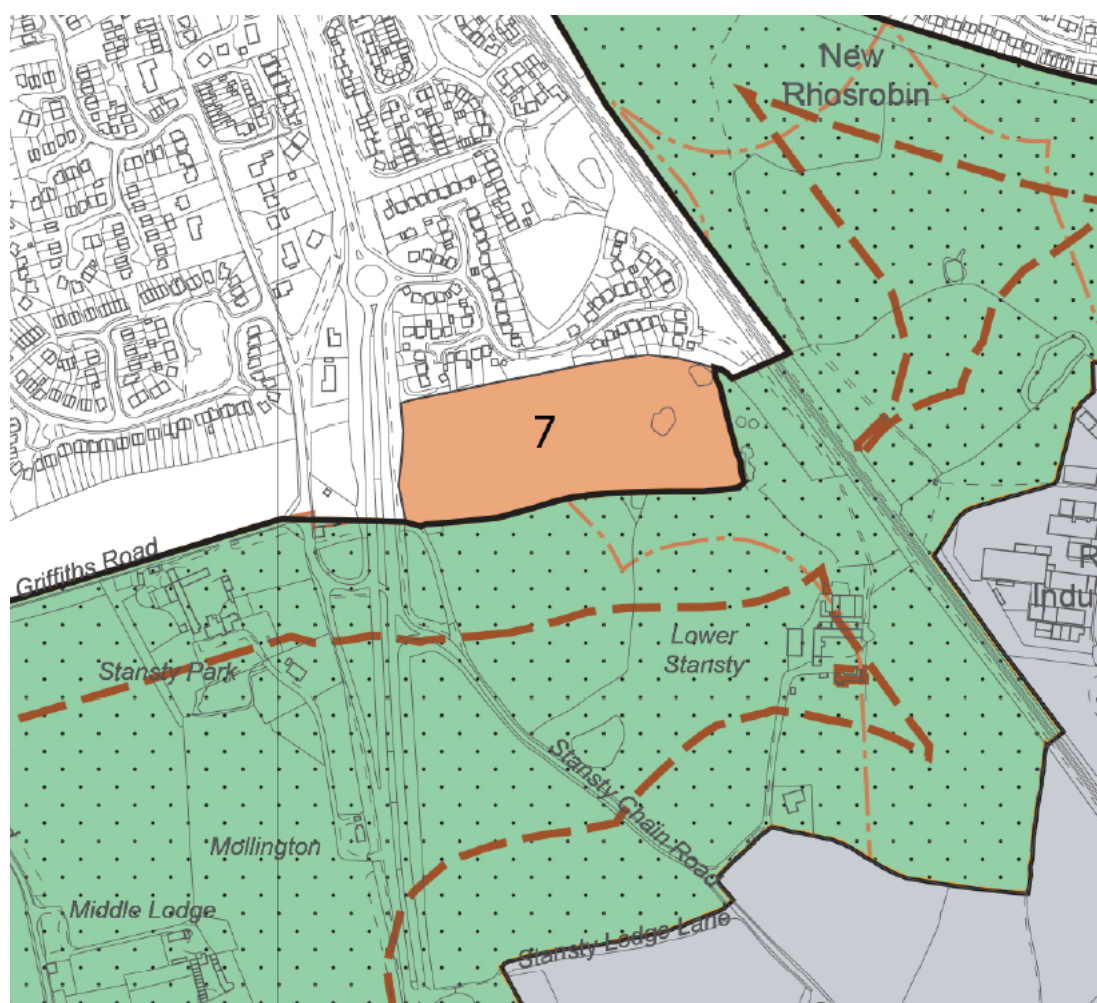
Table 3: Progress on Replacement Wrexham LDP

Stage in Plan-Making Process	Timescales
Consultation on Issues and Options	March 2015
Consultation on Preferred Strategy	April 2016
Consultation on Deposit LDP	May 2018
Examination in Public	September 2019 - ongoing
Main Modifications Consultation	Commenced on 23 rd May 2022 until 6 th July 2022

- 5.11. Consultation on the Main Modifications to the emerging LDP took place in May-July 2022, following the Examination in Public Hearing Sessions which commenced in 2019.
- 5.12. Accordingly, the Replacement LDP is now at a very advanced stage and thus is considered to be capable of attracting significant weight in the determination of this Application. Indeed, there is the possibility that the Replacement LDP will be adopted prior to the determination of this Application. The policies of the adopted LDP can no longer be afforded full weight for decision-making purposes.
- 5.13. Both the Development Management Manual (DMM) and the Development Plans Manual (DPM) advise that certainty regarding the context of an LDP will only be achieved when the LDP Inspectors deliver their binding report. However, paragraph 9.4.9 of the DMM does acknowledge that the evidence underpinning an emerging LDP can be used as a material planning consideration when making planning decisions. Paragraph 7.5 of the DPM is also clear that where an LDP is in preparation, refusing planning permission on grounds of prematurity will not usually be justified except in cases where a development proposal goes to the heart of a plan and is individually or cumulatively significant. That is not considered to be the case in respect of this Application for 70 no. dwellings.

- 5.14. To this end, the emerging LDP identifies a requirement for 7,750 new homes to be built across Wrexham County Borough between 2013 and 20218, at a rate of 516 dwellings per annum. Policy H1 of the emerging Replacement LDP identifies a number of housing allocations across the County Borough, including the Site subject to this Application for 96 dwellings (Site Reference 7), as shown on the emerging LDP Policies Map extract at Figure 5 below.

Figure 5: Emerging Local Development Plan Proposals Map Extract



- 5.15. The Site is also proposed to lie within the amended settlement boundary of Gwersyllt. Gwersyllt is identified as a Key Settlement in the Council's emerging Replacement LDP.
- 5.16. In view of the above, and the weight to now be attached to the Replacement LDP in the determination of this Application, the following additional policies of the Replacement LDP are considered to be pertinent in the determination of this Application, and are considered further in Section 6 of this Statement:

Table 4: Relevant Replacement Local Development Plan Policies

Policy Reference	Policy Title
SP1	Housing Provision
SP2	Location of New Development
SP6	Planning Obligations
SP12	Transport and Accessibility
SP13	Design Principles and Masterplanning Framework
SP14	Health and Well Being
SP15	Natural Environment
SP19	Climate Change
SP20	Green Infrastructure
DM1	Development Management Considerations
NE3	Trees, Woodlands and Hedgerows
NE6	Waste Water Treatment and River Water Quality
H2	Affordable Housing
T1	Managing Transport Impacts
WL1	Welsh Language and the Social and Cultural Fabric of Communities

Planning Policy Wales 11

- 5.17. PPW11 is a material consideration in planning decisions. PPW11 sets out the Welsh Government's approach to sustainable development and core planning principles. This identifies sustainable development as the process by which to improve the *economic, social, environmental and cultural well-being* of Wales, and proposals should seek to promote sustainable development.
- 5.18. Paragraph 1.18 re-iterates the presumption in favour of sustainable development.
- 5.19. Within PPW11, paragraph 1.22 requires development proposals to be determined in accordance with the adopted development plan unless material considerations indicate otherwise.
- 5.20. Placemaking features strongly within PPW11, identified as a holistic approach to the planning and design of development and spaces. This encourages high-quality development, with major developments creating new places.
- 5.21. Chapter 3 of PPW11 identifies the need to encourage and support the use of the Welsh language. Development proposals should consider the likely impact on the Welsh language and is a material planning consideration. It also seeks to protect the best and most versatile agricultural land unless there is an overriding need for its development.
- 5.22. Chapters 3 and 4 of PPW11 look at locational sustainability. New development should be accessible by walking and cycling, and well-served by public transport, as alternatives to the private car. New

development should be located such that it minimises the need to travel and reduces dependency on the private car.

- 5.23. Chapter 4 of PPW11 includes reference to new housing provision, with the need for a supply of land which is deliverable. Local Planning Authorities are required to ensure that the Council's Housing Trajectory forms part of the LDP, and it must set out the expected rate of housing delivery for both market and affordable housing for the LDP period. The Housing Trajectory must be used as the basis for monitoring the delivery of housing delivery in each Authority area. Accurate information on housing delivery assessed against the Trajectory is necessary to form part of the evidence base for development plan Annual Monitoring Reports and for subsequent plan review. Under-delivery against the Housing Trajectory may require a specific early review of an LDP. Monitoring must be undertaken in accordance with the guidance set out in the Development Plans Manual.
- 5.24. Planning applications for housing on sites that comply with an up-to-date development plan should be assumed to be viable. Paragraph 4.2.25 confirms that a community's need for affordable housing is a *material planning consideration* in the determination of planning applications.
- 5.25. Chapter 6 requires development proposals to take account of the wildlife or landscape value of an area (including safeguarding protected species), and states that it is important to balance conservation objectives with the wider economic needs or local businesses and communities. Landscape value is identified as an intrinsic part of PPW11, and consideration should be given at the outset to any landscape value such that the wellbeing needs can be achieved. The provision of green infrastructure is encouraged, and the quality of the built environment should be enhanced by integrating green infrastructure into new development.
- 5.26. Chapter 6 also covers matters relating to flood-risk and drainage. PPW11 is clear that new development should reduce and not increase the risk of flooding; to this end, Local Planning Authorities are encouraged to work closely with Natural Resources Wales, drainage bodies, sewerage undertakers and relevant authorities in the determination of planning applications. This process should ensure that surface water run-off is controlled as near to the source as possible through the use of sustainable urban drainage systems ("SUDS"), ensuring that development does not increase flooding elsewhere by the loss of flood storage/flood flow route, or increase the problem of surface water run-off. Paragraph 6.6.17 requires that development of one or more dwellings also require approval from the SuDS Approval Body ("SAB") before construction can commence. This is designed to ensure that SuDS infrastructure is properly maintained and functions effectively for its design life.

Future Wales – The National Plan 2040

- 5.27. The Welsh Government published the National Plan in February 2021. It serves as the national development framework for Wales, a spatial plan setting the direction for development nationally up to 2040. It provides the basis upon which further guidance, including Planning Policy Wales and Local Development Plans, should be prepared.
- 5.28. Wrexham is identified as a National Growth Area in the National Plan – this will seek to attract and deliver new economic investment, and which in turn will require supporting infrastructure including new housing.
- 5.29. In respect of housing delivery, the National Plan requires a mix of housing types and tenures to create social inclusion and to cater for mixed lifestyles and working arrangements.
- 5.30. Policy 7 focuses on the delivery of affordable homes. Providing housing at levels which meets needs is stated to be a key priority for the Welsh Government. The planning system must facilitate the provision of additional market and affordable housing.
- 5.31. In the North, Local Development Plans should seek to support growth and appropriate development in rural towns and villages. This includes market and affordable housing.

Technical Advice Notes (TAN)

- 5.32. Alongside PPW11, a number of Technical Advice Notes ("TAN") have been prepared by the Welsh Government. Those of relevance to the determination of this Application comprise the following:
- TAN2 – Planning and Affordable Housing
 - TAN5 – Nature Conservation and Planning
 - TAN11 - Noise
 - TAN12 – Design
 - TAN15 – Development and Flood Risk
 - TAN16 – Recreation and Open Space
 - TAN18 – Transport
 - TAN20 – Planning and the Welsh Language
 - TAN24 – The Historic Environment

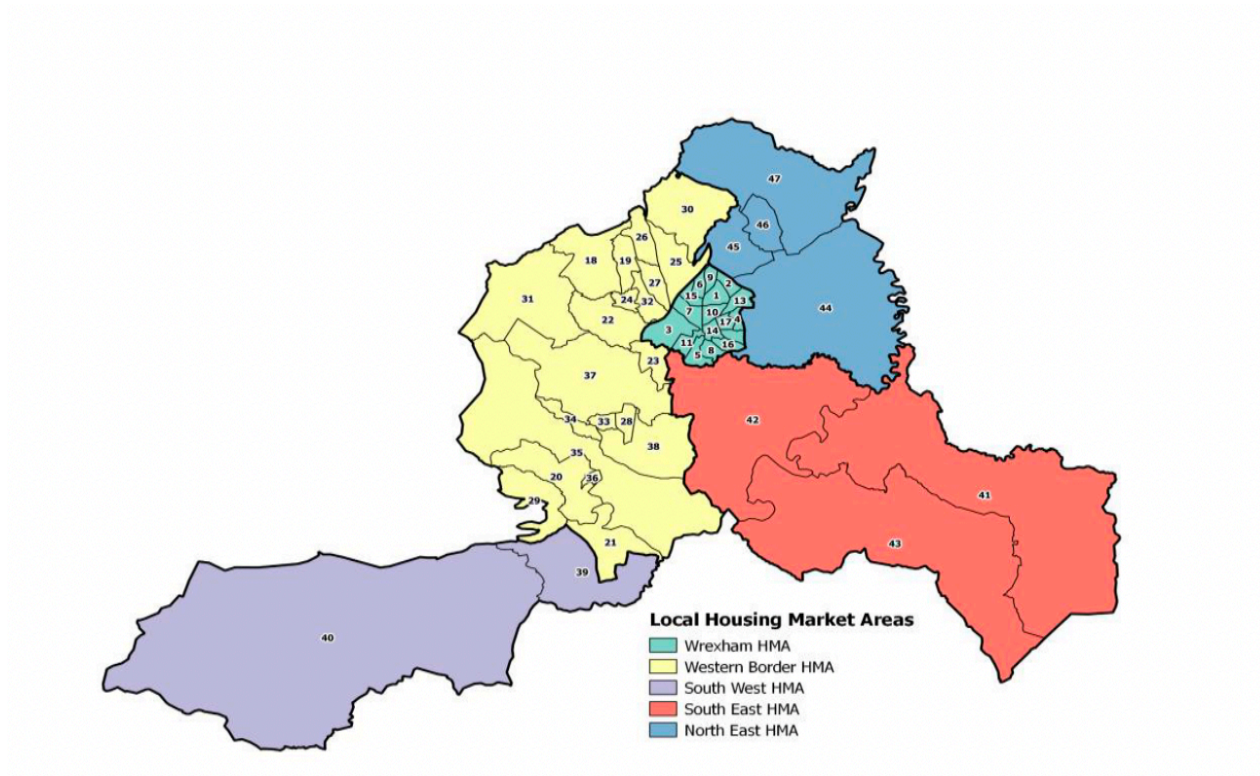
Other Material Planning Considerations / Evidence Base Documents

- 5.33. Wrexham County Borough Council has published a number of other material planning considerations and evidential based documents which are considered to be pertinent in the consideration of this Application; further details are set out below.

Local Housing Market Assessment (LHMA)

- 5.34. The Council's most recent 2017 Local Housing Market Assessment (LHMA) Update was published in April 2018.
- 5.35. It also provides details of the five Local Housing Market Areas within Wrexham, shown below:

Figure 6: LHMA's in Wrexham



- 5.36. The LHMA identified a need for 157 new affordable homes a year across Wrexham County Borough.
- 5.37. The Site was identified as lying within the Western Border HMA. Tables 6.5 and 6.6 of the LHMA identified an affordable need for the following:

Table 6.5 Overall affordable housing need by sub-area									
Sub-area	Number of bedrooms and Table %						Total	Total (% need by area)	Base (no. households by sub-area)
	1	2	3	4	5	6			
South West	0.4	0.3	0.1	0.0	0.0	0.0	0.8	14	0.8
North East	3.3	1.3	0.5	0.1	0.0	0.0	5.2	87	5.2
South East	1.3	1.0	0.6	0.2	0.0	0.0	3.0	50	3.0
Western Border	26.1	14.0	7.9	1.3	0.1	0.0	49.3	826	49.3
Wrexham	21.8	12.1	6.3	1.4	0.1	0.0	41.7	698	41.7
Base (need by beds needed)	886	478	259	50	2	0	1,675	1,675	100.0
% need by bedrooms	52.9	28.5	15.5	3.0	0.1	0.0	100.0		

Table 6.6 Affordable housing need by sub-area and dwelling size									
Sub-area	Affordable need		Summary of Dwelling size						Total
	1 yr	5 years	1	2	3	4	5	6	
South West	1	7	50.0	35.7	14.3	0.0	0.0	0.0	100.0
North East	8	41	63.2	24.1	10.3	2.3	0.0	0.0	100.0
South East	5	23	42.0	32.0	20.0	6.0	0.0	0.0	100.0
Western Border	77	387	53.0	28.3	16.0	2.5	0.1	0.0	100.0
Wrexham	65	327	52.3	28.9	15.2	3.4	0.1	0.0	100.0
Total	157	785	72.3	14.2	9.2	2.8	0.0	1.4	100.0
Base	157	785							

- 5.38. Within the Western Border HMA, it is clear that there is a need for 1, 2 and 3 bedroom affordable homes.
- 5.39. Since the LHMA was published, the emerging Replacement LDP now contains a Viability Map (as updated in the Schedule of Matters Arising) published in November 2021 and consulted on in 2022. The Viability Map shows the Site as lying within the North Wrexham and Gresford Housing Market Area, to which Policy H2 of the emerging Replacement LDP is applicable.

Local Planning Guidance Notes

- 5.40. Wrexham County Borough Council has published the following Local Planning Guidance Notes ('LPGN') which are considered relevant in the determination of this Application:
- LPGN10 – Public Open Space on New Housing Developments
 - LPGN16 – Parking Standards
 - LPGN17 – Trees and Development
 - LPGN21 – Space around Dwellings
 - LPGN24 – Designing out Crime
 - LPGN27 – Development Contributions to Schools
 - LPGN28 – Affordable Housing
 - LPGN30 – Design
 - LPGN32 – Biodiversity and Development

5.41. Compliance of the proposed development with these LPGNs is considered in Section 6 of this Statement.

6 TECHNICAL AND POLICY ASSESSMENT

- 6.1. This Section of the Statement assesses the proposed development against the relevant policies of the development plan, and other material considerations, as documented in Section 5.

Principle of Development

- 6.2. As documented in Section 5 of this Statement, the Site is currently shown on the adopted UDP Proposals Map as lying outside but adjacent to the settlement boundary of Gwersyllt, in the Green Barrier. Its development would therefore be contrary to Policy EC1 of the UDP. However, as set out in Section 5 of this Statement, the Plan period for the UDP expired back in 2011, and is now considerably out-of-date. This includes the settlement limits shown on the UDP Proposals Map, and which are controlled by Policy H5. Accordingly, the weight to be afforded to these policies is severely diminished, and the UDP settlement limits are out-of-date.
- 6.3. Wrexham County Borough Council is now well-advanced with the preparation of its Replacement LDP. Indeed, consultation on the Main Modifications to the emerging LDP took place in May -July 2022, following the Examination in Public Hearing Sessions since 2019. The Replacement LDP is now at a very advanced stage and is therefore considered to be capable of attracting significant weight in the determination of this Application. Indeed, there is the possibility that the Replacement LDP could be adopted prior to the determination of this Application.
- 6.4. Both the Development Management Manual (DMM) and the Development Plans Manual (DPM) advise that certainty regarding the context of an LDP will only be achieved when the LDP Inspectors deliver their binding report. However, paragraph 9.4.9 of the DMM does acknowledge that the evidence underpinning an emerging LDP can be used as a material planning consideration when making planning decisions. Paragraph 7.5 of the DPM is also clear that where an LDP is in preparation, refusing planning permission on grounds of prematurity will not usually be justified except in cases where a development proposal goes to the heart of a plan and is individually or cumulatively significant. That is not considered to be the case in respect of this Application.
- 6.5. To this end, the emerging Replacement LDP identifies a requirement for 7,750 new homes to be built across Wrexham County Borough between 2013 and 2038, at a rate of 516 dwellings per annum. Policy H1 of the emerging LDP identifies allocations for housing, including the Site subject to this Application for 96 dwellings (Site Reference 7), as shown on the emerging Replacement LDP Policies Map extract at Figure 5 of this Statement. The Site is also proposed to lie within the amended settlement boundary of Gwersyllt, identified as a Key Settlement for growth.
- 6.6. Taking the above into account, and the need to deliver new market and affordable housing in Wrexham County Borough, the very fact that the Site has been proposed for allocation in the emerging Replacement LDP is considered to weigh heavily in favour of the proposed development.

The proposed development of 96 no. dwellings, consistent with the indicative allocation figure, will make a valuable and much-needed contribution to market and affordable housing delivery in Wrexham in line with the Replacement LDP housing trajectory, and the proposed development of 96 no. dwellings would not be premature to that very emerging Replacement LDP.

- 6.7. The proposed development will provide for the efficient use of the land whilst delivering a mix of house types which respond to local housing needs, delivering predominantly a range of 2 to 3 bedroom homes. It will not lead to unsustainable and harmful development.
- 6.8. In summary, the principle of residential development on the Site is considered to be supported by and consistent with Policy H1 of the emerging Replacement LDP and the evidence underpinning it, as a material planning consideration consistent with paragraph 9.4.9 of the DMM. It also aligns with Policies SP1 and SP2 of the emerging Replacement LDP. This is considered to outweigh any conflict with Policies EC1 and PS1 of the adopted UDP, the weight to be afforded to which in the determination of the is Application is now severely diminished.

Housing Mix, Affordable Housing and Density

- 6.9. As set out in Section 4 of this Statement, the proposed development will comprise the following housing mix:

Affordable Housing

- 16 no. 2-bed semi-detached terraced properties;
- 6 no. 3-bed end terraced properties; and
- 2 no. 3-bed semi-detached properties.

Market Housing

- 4 no. 2-bed mid-terraced properties;
- 4 no. 3-bed end-terraced properties;
- 14 no. 3-bed semi-detached properties;
- 21 no. 3-bed detached properties; and
- 29 no. 4-bed detached properties.

- 6.10. The proposed development will incorporate 24 affordable homes, equating to 25% of the total number of dwellings consistent with Policy H2 of the emerging Replacement LDP insofar as it relates to development in the North Wrexham and Gresford Sub-Market Area. The 25% policy requirement in this Sub-Market Area reflects that as set out in the Schedule of Matters Arising Changes published by the Council in November 2021 and consulted on in 2022.

- 6.11. The proposed affordable properties take the form of 2 and 3 bedroom homes, responding to the housing needs identified in the LHMA Update.
- 6.12. The affordable homes will be pepper-potted throughout the Site and indistinguishable in appearance from the market homes. The provision of affordable housing is a material planning consideration to be taken into account in the determination of this Application consistent with paragraph 4.2.25 of PPW11.
- 6.13. Table 5.8 of the LHMA Update sets out recommendations on the housing mix that should be sought as part of new developments by type and size, as set out below:

Figure 7: Housing Mix in LHMA

Table 5.8 Open market dwelling stock and preferences			
Dwelling type/size summary	% Profile of new dwelling stock based on:		
	Current stock	Like	Expect
House 1/2 Beds	17.4	19.5	26.4
House 3 Beds	43.1	32.8	39.9
House 4 or more Beds	20.8	23.7	10.4
Bungalow	14.0	22.5	12.2
Flat	3.9	1.5	9.6
Other	0.9	0.1	1.4
Total	100.0	100.0	100.0
<i>Base</i>	<i>45,310</i>	<i>8,976</i>	<i>8,305</i>

Source: 2014 Household Survey

- 6.14. As part of the proposed development, the overall housing mix comprises the following:
- 21% 2-bedroom mid/end terraced homes;
 - 49% 3-bedroom end terraced and detached homes; and
 - 30% 4-bedroom detached homes.
- 6.15. The proposed housing mix does include a slightly larger percentage of 3 and 4 bedroom properties than recommended in the table above. However, this is considered to be reflective of market demand post the Covid-19 pandemic, with more people now seeking an extra bedroom in at least a 3-bedroom property to afford greater flexibility for home-working.
- 6.16. As an established North Wales housebuilder, the Applicant has received interest from a number of parties seeking a new property across North Wales.
- 6.17. Over the last 12 months, the Applicant has recorded the following levels of interest:

- 13 no. enquiries for 2-bedroom homes;
- 38 no. enquiries for 3-bedroom homes; and
- 92 no. enquiries for 4-bedroom homes.

- 6.18. The Applicant has not received any enquiries for 1-bedroom homes. Whilst there is understood to be some need for 1-bedroom homes, this has not been reflected in the market demand experienced by the Applicant.
- 6.19. The Covid-19 pandemic has had a significant impact on people's daily lives, perhaps most notably their working patterns and location. This is not something which was naturally factored into the LHMA when published in 2018, pre-pandemic, and thus is now something of a limitation of that particular evidence base.
- 6.20. The Covid-19 pandemic has triggered a significant shift in people's housing/accommodation needs, with the requirement for extra space from which to work at home now a new and important consideration. This includes additional space for a home office/study, which typically takes the form of an extra-bedroom.
- 6.21. Accordingly, those people previously seeking a 2-bedroom property will now be seeking a three-bedroom property, and so forth, subject to availability and cost. It is therefore crucial that the housing market responds to these needs, both now and in the future. It is not considered to be 'good, positive planning' to simply focus on meeting historic needs, which no longer reflect the significant social changes which have now taken place in since the LHMA was produced. Such an approach would be counter-intuitive. The Applicant is therefore firmly of the view that the demand for more living space must be reflected in the housing mix which is presented as part of the proposed development.
- 6.22. The proposed net density across the Site will be 35.89 dwellings per hectare taking account of the Site's location, surroundings, configuration and wider policy requirements (including open space and landscaping/buffer). This also reflects the Site's proposed allocation under Policy H1 of the emerging Replacement LDP.
- 6.23. The proposed housing mix is considered to appropriately align with the housing needs identified in the Council's LHMA Update. The provision of affordable housing is a material planning consideration to be taken into account in the determination of this Application consistent with paragraph 4.2.25 of PPW11.
- 6.24. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policy H7, emerging Replacement LDP Policies H2 and SP1, LPGN28, TAN2 and PPW11.

Locational Sustainability

- 6.25. As demonstrated in Section 2 of this Statement, the Site evidently occupies a sustainable location. It benefits from very good access to local services and amenities, and local bus services. It is well-connected via the existing footpath network and which will be improved as a result of the proposed development. The wider economic, social, environmental and cultural well-being benefits of the proposed development are considered in Section 7 of this Statement.

Deliverability of the Site

- 6.26. This Applicant has secured an agreement with the landowner of the Site with a commitment to acquire the freehold subject to securing planning permission.
- 6.27. Upon any successful grant of detailed planning permission, the Applicant would seek to make a start on-site within 3-6 months (allowing time to execute the S106 Agreement, any discharge any pre-commencement planning conditions and to make the necessary contractor arrangements).
- 6.28. The Applicant has advised that they would anticipate the Site could be completed within c. 24-36 months from any grant of planning permission. Accordingly, the proposed development will make an immediate and significant contribution towards addressing the market and affordable housing needs in Wrexham.

Layout and Design

- 6.29. As documented in Section 4 of this Statement, careful consideration has been afforded to the proposed layout taking account of the Site's surroundings and context, technical and policy requirements including accessibility (road widths, visibility splays, pedestrian linkages), topography, impact on trees/hedgerows/ecology, impact on heritage assets, and privacy/amenity (of nearby existing residential properties).
- 6.30. This has informed the careful preparation of a Site Layout which has sought to limit as much as possible the impact on existing trees and hedgerows within and surrounding the Site. It will provide for a sustainable and logical extension to the settlement.
- 6.31. The creation of two-storey dwellings on the Site is considered appropriate having regard to the Site's surrounding context, the prevailing local character, and its physical characteristics. The layout and siting of the proposed dwellings is in accordance with the Council's spacing standards in LPGN21.
- 6.32. The house types, plot sizes and palette of materials have been designed to provide for the efficient use of land, whilst delivering high-quality accommodation and a high-quality living environment which raises the standard of design in the immediate locality but at the same time is reflective of

the local character. The layout also provides for the natural surveillance of properties and public spaces/pedestrian and cycle linkages within the Site from properties with a view to designing out crime and to ensure the well-being of residents. There are no blank wall elevations onto any open public open space (i.e Plots 45 to 52).

- 6.33. The proposed net density across the Site will be 35.89 dwellings per hectare; this is considered to be acceptable taking account of the guidance contained in emerging Replacement LDP Policy SP1, which seeks a minimum density of 30 dwellings per hectare, and the wider policy requirements to be met across the Site.
- 6.34. Each property is designed to allow for access by people of all abilities.
- 6.35. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policy GDP1, emerging Replacement LDP SP13 and DM1, LPGN21, LPGN24, and LPGN30, TAN12, and PPW11.

Agricultural Land Quality

- 6.36. Based on the Welsh Government's Predictive Agricultural Land Classification Mapping, the Site comprises a mix of Urban Land, and Grade 3a and Grade 3b agricultural land.
- 6.37. Policy EC2 of the UDP only allows for the development of Grade 1, 2 and 3a agricultural land where it does not lead to the irreversible loss of that land. However, the weight to be afforded to that policy is considerably diminished given the time-expired nature of the UDP and the very advanced status of the emerging Replacement LDP.
- 6.38. To this end, the proposed housing allocation of the Site under Policy H1 of the emerging Replacement LDP confirms that a) the development of the Site is required such that the identified housing needs of Wrexham County Borough during the Replacement LDP Plan period up to 2028 (and we are already well into this Plan period), and b) the loss of the land for agricultural purposes and its residential land-use has been assessed and accepted by Wrexham County Borough Council as part of the Replacement LDP plan-making process. It is not therefore possible for the development needs of the County to be met on lower grade agricultural land, effectively confirmed by virtue of its proposed housing allocation.
- 6.39. Accordingly, the loss of best and most versatile agricultural land is not considered to constitute a defensible or reasonable ground for refusal of the Application and the proposed development would not conflict with UDP Policy EC2 (the weight to be afforded to which is diminished owing to the out-of-date development limits), and PPW11.

Trees and Hedgerows

- 6.40. An Arboricultural Impact Assessment (AIA) has been undertaken across the Site and is submitted with the Application.
- 6.41. The proposed development has sought to retain existing tree and hedgerow planting, as well as providing compensatory/additional soft landscaping.
- 6.42. In doing so, it has been established that the following trees and hedgerows will need to be removed from the Site to accommodate the proposed development:
- H1 in part; (Category C2)
 - H2 in part (Category C2)
 - H3 in part (Category C2)
 - H4 in part (Category C2)
 - G6 (Category C2)
 - G7 in part (Category C2)
 - G8 (Category C2)
- 6.43. As can be seen above, no Category A or B species are to be removed to facilitate the proposed development.
- 6.44. In addition to the above, the AIA has assessed the potential for the proposed development to impact on other retained trees and hedgerows. This includes a number of additional trees/groups of trees as listed in Table 1 of the AIA, owing to issues relating to the provision of new hard surfaces/services, the construction of new buildings, pruning requirements, and indirect physical impacts.
- 6.45. Tree protection measures are proposed to minimise/mitigate the impact of the proposed development on these species, namely tree protection fencing to be erected prior to the commencement of development. Such measures can be secured through an Arboricultural Method Statement which can be secured by way of planning condition, if it is deemed necessary.
- 6.46. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies EC4 and GDP1, emerging Replacement LDP Policies SP20, DM1 and NE3, LPGN17, TAN5, and PPW11.

Landscaping and Public Open Space

- 6.47. As documented in Section 4 of this Statement, Landscape Plans have been prepared and are submitted with the Application; these set out the Applicant's intentions to provide new and compensatory tree and hedgerow planting across the Site. They also provide details of the proposed boundary treatments within (between plots) and at the perimeter of the Site.
- 6.48. As set out above, existing trees and hedgerows are only proposed to be removed where they are required in order to secure vehicular and pedestrian connections, and to facilitate the proposed development as whole (including new hard surfaces and built form).
- 6.49. As detailed in Section 4 of this Statement, 0.36 hectares of public open space will be provided towards the eastern edge of the Site. This will include an attenuation basin as part of the surface water drainage strategy. An existing landscape and buffer zone will also be provided extending to 0.06 hectares.
- 6.50. Details relating to the maintenance of the public open spaces can be secured by way of a planning obligation.
- 6.51. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies CLF5 and GDP1, emerging Replacement LDP Policies SP14, SP20 and DM1, LPGN10, TAN16, and PPW11.

Highways and Road Safety

- 6.52. As documented in Section 4 of this Statement, vehicular (and pedestrian/cycle) access to the Site will be provided for through the creation of a new access from Mold Road at the western boundary of the Site, designed to adoptable standards.
- 6.53. The proposed arrangements, including road and footpath widths, as described in Section 4 of this Statement are considered to be acceptable and will facilitate safe movements by vehicles (include refuge), pedestrians and cyclists of all abilities into and out of the Site, and through it, as well as providing safe connectivity to the immediate surroundings. The proposed development should encourage and facilitate Active Travel as a result.
- 6.54. In respect of car parking provision within the Site, the standards which have been applied by the Applicant are broadly consistent with those set out by the Council in LPGN16.
- 6.55. The Transport Statement submitted with the Application has assessed the potential impacts of the proposed development on the local highway network and road safety.

- 6.56. In terms of trip generation, it has been established within Section 5 of the accompanying Transport Statement that the proposed development will generate the following:
- 13 vehicle arrivals, and 35 vehicle departures from the Site during the weekday AM peak hour; and
 - 29 vehicle arrivals and 14 vehicle departures from the Site during the weekday PM peak hour.
- 6.57. This proposed increase in traffic is not anticipated to have a material impact on the operation or safety of the local highway network on Mold Road. As such, there are no highway or transport related reasons to withhold planning permission for the proposed development. Furthermore, it is not considered that there is any requirement for any additional assessment of the local highway network.
- 6.58. As a condition of any planning permission, the Applicant is willing to accept the requirement to submit a Construction and Environmental Management Plan, and which will include details of construction traffic, site compound, contractor parking, and construction hours amongst others.
- 6.59. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies GDP1, GDP2, T8 and T9, emerging Replacement LDP Policies SP12, DM1 and T1, LPGN16, TAN18, and PPW11.

Nature Conservation

- 6.60. A detailed Preliminary Ecological Appraisal (PEA) has been undertaken across the Site.
- 6.61. The PEA has assessed the Site for feature of ecological importance and in doing so, has considered the impacts of the proposed development on ecological habitats.
- 6.62. The PEA has established the following:
- The Site provides habitat for badger and small mammals, within the scrub, semi-improved grassland, species poor hedgerow, scattered trees, ponds and ditches. It is therefore recommended that a Badger Reasonable Avoidance Measures Method Statement is produced and implemented during works to avoid harm to this species;
 - The Site provides suitable habitat for Water Vole. If works are to occur within 5m of the ponds and ditches adjacent to the Site boundaries, a survey for water vole should be undertaken;
 - The Site provide habitat for hedgehog within the scrub, semi-improved grassland, species poor hedgerow and scattered trees. It is therefore recommended that a Hedgehog Reasonable Avoidance Measures Method Statement is produced and implemented during

works to avoid harm to this species. It is advised that gaps of at least 13cm by 13cm are left under any new garden fences to enable hedgehog to roam freely within the area following development;

- The semi-improved grassland, species poor hedgerow, scattered trees, and scrub provide suitable habitat for nesting and foraging bird species. Vegetation clearance and building roof works should be undertaken outside of the nesting bird season to avoid any impact on nesting birds;
- Bat records were returned within 2km of the Site. The closest record was 196m south of the Site. No buildings are present on the Site. The habitats on the Site provide moderate suitability for commuting and foraging bats and will require bat activity surveys to be carried out once a month between April and October, along with the deployment of two static bat detectors for a minimum of five nights per month. The trees within the Site boundary were assessed to provide negligible to low potential for bats. If works have not commenced by March 2023, a preliminary bat roost assessment of trees to be removed or pruned should be undertaken to assess their potential to support a bat roost and to inform further recommendations if required;
- Ponds 1 to 4, and the two ditches, will require bottle trapping surveys between mid-March to June to assess the Great Crested Newt population within the pond network. Further surveys may be required for all ponds within 250m of the Site. The Site does provide terrestrial habitat for Great Crested Newt and amphibians. It is recommended that Reasonable Avoidance Measures are implemented during the works to avoid harm to this species; and
- No non-native species were identified on the Site.

6.63. The PEA contains a number of enhancement measures in Section 5, including the provision of 12 no. bird boxes, 10 no. bat features, and landscaping works.

6.64. Accordingly, and subject to following recommendations set out in the Survey, the proposed development is considered to respond positively to and is consistent with UDP Policies Ec6 and GDP1, emerging Replacement LDP Policies SP15, SP20 and DM1, LPGN32, TAN5 and PPW11.

Flood-Risk and Drainage

6.65. As documented in Section 2 of this Statement, the Site lies in Flood Zone A. It is therefore deemed by Natural Resources Wales to be at a low risk of surface water, groundwater, fluvial and tidal flooding, as confirmed in the accompanying Flood Consequences Assessment and Drainage Strategy. The Site is also not deemed to be at risk of flooding from artificial sources (reservoirs/canals/sewers).

- 6.66. In accordance with TAN15 and the latest national standards on Sustainable Urban Drainage Systems documented in the Flood and Water Management Act 2010, a drainage strategy has been prepared and is submitted with the Application (as set out in the accompanying Flood Consequences Report and Drainage Strategy, and shown on Drawing Ref. 7956 / SK01 Rev. D). This has identified the proposed surface water and foul water drainage solutions as set out in Section 4 of this Statement. Full details of the proposed drainage solution will need to be agreed in consultation with the statutory consultee bodies (LLFA and Welsh Water).
- 6.67. Accordingly, and subject to the recommendations set out in the FCA and Drainage Strategy, the proposed development is considered to respond positively to and is consistent with UDP Policies EC12, GDP1 and GDP2, emerging Replacement LDP Policies SP15, SP19, DM1 and NE6, TAN15 and PPW11.

Welsh Language

- 6.68. As set out previously in this Statement, the Site is now a proposed housing allocation under Policy H1 of the emerging Replacement LDP, through which the development of the Site for housing has been tested and accepted. As a result, the proposed development of the Site is not considered to cause harm to the Welsh language and would not conflict with UDP Policies GDP1 and GDP2, emerging Replacement LDP Policies DM1 and WL1, TAN20 and PPW11.
- 6.69. Notwithstanding this, a number of enhancement measures could be considered which would support the local community and linguistic effects. These could include bi-lingual street names and signage, local advertisement/marketing of the properties, the preparation and submission of a Construction Method Statement, and a detailed lighting design.

Planning Conditions

- 6.70. As outlined within this Statement, the Applicant is willing to accept a number of planning conditions related to the proposed development where these satisfy the six tests set out in the Welsh Government Circular published in October 2014 and WGC 016/2014. These include, amongst others:

- Drainage (surface water and foul water);
- Materials;
- Affordable Housing;
- Construction and Environmental Management Plan;
- Tree protection measures (as per Arboricultural Method Statement);
- Reasonable avoidance measures (as per PEA); and
- Lighting.

Planning Obligations

- 6.71. The Applicant is committed to engaging in discussions with Officers at Wrexham County Borough Council in relation to securing planning obligations where these satisfy the requirements set out in UDP Policy GDP2, emerging Replacement LDP Policy SP6, and Regulation 122 of the Community Infrastructure Levy Regulations which require that:
- The obligations must be necessary to make the proposed development acceptable in planning terms;
 - The obligation must be directly related to the proposed development; and
 - The obligations must be fairly and reasonably related in scale and kind to the proposed development.
- 6.72. Any requests for financial contributions consistent with the aforementioned policy tests must be justified by up-to-date evidence.

7 CASE FOR DEVELOPMENT

- 7.1. Having regard to the Technical Assessment in Section 6 of this Statement, this Section goes on to consider the proposed development in the context of the overarching objectives of sustainable development as documented in paragraph 2.28 of PPW11.

Social Benefits

- 7.2. The proposed development will deliver the following **Social** benefits:
- The delivery of 96 no. new dwellings in Wrexham County Borough where there is an accepted need for new market and affordable housing in line with the Replacement LDP housing trajectory. The proposed development will involve the development of land allocated for housing in the emerging Replacement LDP, lying within the re-defined settlement limits of Gwersyllt, the principle of which is now considered to be established and supported by virtue of the advanced status of the Replacement LDP (and the fact that we are well into the Plan period up to 2028). It will provide for a logical extension to the settlement of Gwersyllt at its south-eastern edge;
 - The delivery of 24 no. affordable homes, 25% of the proposed development consistent with emerging policy requirements, and which is a material planning consideration. These will comprise 2 and 3 bedroom homes reflecting the findings of the LHMA and which will be accessible by local people; and
 - The creation of a high-quality living environment which is a) proportionate to the size of the settlement based on an acceptable density per hectare, b) positively contributes to the character and appearance of the Site and its context by raising the quality of design in the area, and c) is consistent with the Council's LPGNSs, Technical Advice Notes, and the placemaking aspirations set out in PPW11.

Economic Benefits

- 7.3. The proposed development will deliver the following **Economic** benefits:
- The creation of direct construction jobs (on and off-site) over the lifetime of the build programme, and indirect jobs through the local supply chain via the purchase of goods and services;
 - Increased local expenditure (convenience, comparison, leisure, services) to help support and sustain the local community and businesses;

- Annual Council Tax contributions to Wrexham County Borough Council from the 96 no. proposed new dwellings;
- Gross Value Added to the local economy generated by future residents of the proposed development; and
- Potential planning obligations where these satisfy Regulation 122 of the CIL Regulations, including a financial contribution towards primary and secondary education if justified.

Environmental Benefits

7.4. The proposed development will deliver the following **Environmental** benefits:

- Existing trees and hedgerows within and at the perimeter of the Site will be retained wherever possible, other than where removal is required to facilitate the proposed development. Landscaping, including new tree and hedgerow planting across the Site, provides the opportunity to achieve secure net gains in biodiversity whilst at the same time minimising the landscape and visual impacts of the proposed development;
- The proposed development is not likely to give cause to the loss of any features of significant ecological value, nor cause harm to any protected species, albeit further survey work is recommended. Further surveys are required to assess the potential impacts of the proposed development on bats and Great Crested Newts/amphibians;
- The proposed surface water drainage measures which will not increase or exacerbate flood-risk or surface water run-off elsewhere;
- The creation of safe and adoptable access arrangements from Mold Road, and which will facilitate and encourage safe pedestrian and cycle movements by connecting to the existing network through the creation of new footway linkages;
- Development on a sustainable site which provides the opportunity for future residents to travel by foot and public transport to access shops, education, jobs and services, reducing the reliance on private car travel and with it providing for a reduction in carbon emissions. The Site's location means that future residents will enjoy very good access to education, shops and services by walking and cycling, provided for through new and safe linkages, consistent with the guidance criteria set out in Section 4 of the accompanying Transport Statement. Where the use of the private car is required, the proposed development will have a barely perceptible impact on the highway network and road safety;

- The proposed development will not have any adverse impact on the historic environment, including the setting and significance of nearby heritage assets;
- The proposed development will not create any adverse impacts in relation to noise, contamination and air quality/odour; and
- Construction of energy efficient homes using established techniques which the Applicant applies to all of its new-build properties.

Cultural Well-Being

7.5. The proposed development will deliver the following **Cultural** benefits:

- The Applicant recognises that the proposed development presents the opportunity for an overall positive community and linguistic impact. To this end, and if deemed necessary, they are willing to consider the provision of bilingual signage within the proposed development amongst other measures such that the proposed development has the potential for a positive community and linguistic impact;
- The proposed development will not cause harm to any existing heritage assets nor assets of cultural significance; and
- There is no evidence to suggest or support any view that the proposed development cannot be integrated within the settlement, and nor that it would impact on the safety and cohesion of the community. The Site is proposed to be allocated under Policy H1 of the emerging Replacement LDP, and its suitability for residential development has been fully tested as part of the plan-making process including by independent Inspectors at the Examination in Public.

8 CONCLUSIONS

8.1. This Statement has been prepared in support of a detailed planning application for the proposed development of Land at Stansty Fields, Mold Road, Gwersyllt, Wrexham.

8.2. The description of development for which detailed planning permission is sought is:

“Residential development at Land at Stansty Fields, Mold Road, Gwersyllt, Wrexham, LL11 4AX”

8.3. This Statement has demonstrated that whilst the proposed development would conflict with Policy EC1 of the adopted UDP, the latter is now time-expired together with the evidence underpinning it. The settlement limits set out in the UDP, controlled by Policy H5, are out-of-date. To this end, the emerging Replacement LDP and the evidence base underpinning it is a material consideration in the determination of this Application for the reasons set out in this Statement and which should be afforded significant weight given its advanced stage of preparation.

8.4. The principle of residential development on the Site is supported through its proposed housing allocation for 96 no. dwellings under Policy H1 of the emerging Replacement LDP (Site Reference 7), and its location within the re-defined settlement limits of Gwersyllt.

8.5. The proposed development will represent a logical extension to the settlement at its south-eastern edge delivering a balanced mix of much-needed, high-quality new market and affordable housing which provides for the efficient and sustainable use of the land. The proposed housing mix responds to need and market demand.

8.6. In respect of the technical considerations assessed in Section 6 of this Statement, the proposed development will not give cause to any negative adverse impacts. It satisfies the key policy and technical requirements set out in the LDP (adopted and emerging) and other material considerations including the Council's LPGN's, and national planning policy contained in the Technical Advice Notes and PPW11.

8.7. As set out in Section 7 of this Statement, the proposed development will generate a number of economic, social, environmental and cultural well-being benefits consistent with the overarching objectives set out in PPW11.

8.8. In the overall planning balance, the proposed sustainable development is considered to be acceptable; the Applicant therefore kindly requests that detailed planning permission be granted in accordance with the UDP (insofar as weight can still be afforded to some of its policies), the relevant policies of the very advanced emerging Replacement LDP which should attract significant weight,

and its evidence base as a material planning consideration in the determination of this Application consistent with paragraph 9.4.9 of the DMM, and paragraph 1.18 of PPW11.

