Pre-Application Consultation (PAC) Report

16 Lord Street, Wrexham



March 2025

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APPENDICES

Appendix 1: Copy of Signed Site Notices in both English and Welsh, and a map of where the site notices were placed around the site.

Appendix 2: Sample letter posted to Neighbour and relevant Statutory and Community Consultees.

Appendix 3: List of addresses circa 50m radius from the site

1 INTRODUCTION

Background

1.1 The Leith Group have been instructed by Wrexham property Holdings Ltd ('The applicant') to prepare this Pre-Application Consultation (PAC) report in respect of a detailed planning application for the following development, namely:

> "*Change of use of from offices (class E) to residential (class C3), comprising of 23 flats, including replacing* existing shop front windows with new domestic sized windows, installing new window openings and the erection of fencing and gates to the bike store and bin store."

1.2 In accordance with Part 1A of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, all major developments are required to be subject of formal preapplication consultation prior to the Planning Application being validated by the Local Planning Authority. This report summarises the public consultation undertaken in accordance with these requirements.

1.3 The consultation officially took place between the 8th December 2024 and the 11th January 2025 for more than the requisite 28-day period. We do address that one Statutory consultee was initially missed off our email list. As a result, we consulted with this consultee on the 14th January 2025, and ensured that we provided a further statutory 28-day minimum period to allow for their comments to be received.

1.4 Site notices were displayed around the application site, notifications were sent to local residents, community consultees and specialist consultees, and a copy of the draft application was made available for online public viewing, as set out in the regulations.

1.5 This PAC report is prepared in accordance with Part 1A Section 2F of the Planning (Wales) Act 2015 and demonstrates how the applicant has complied with Section 61Z of the 1990 Act, and responded to the consultation responses received. The document has also been prepared being mindful of the provisions of guidance produced by the Welsh Government entitled ‘New development management procedures’ letter issued in February 2016, and the document entitled ‘Pre-application Community Consultation: Best Practice Guidance for Developments’ published December 2021.

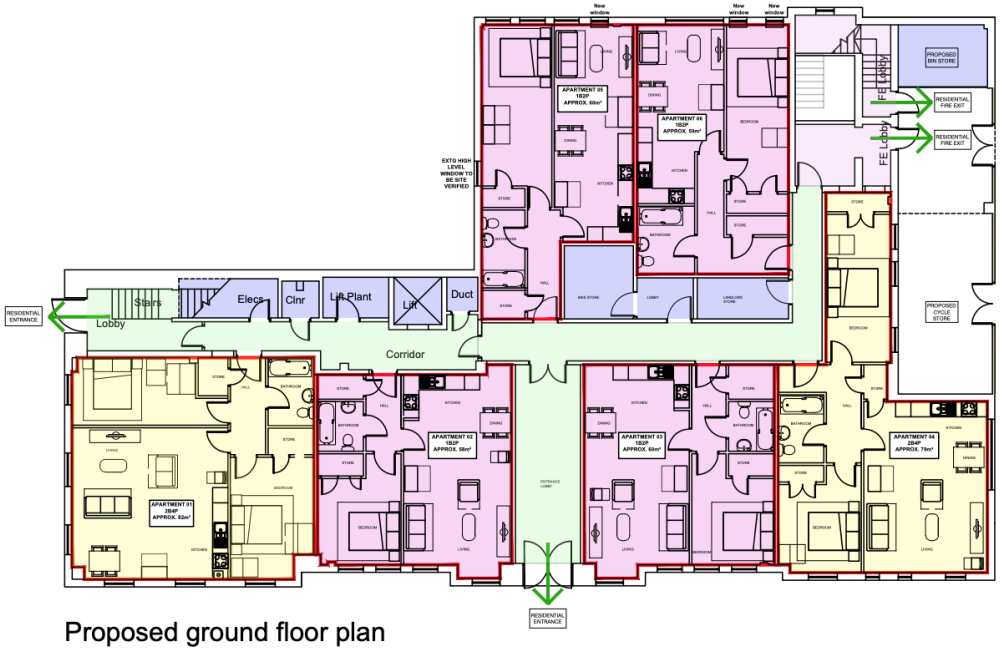
1.6 The responses to the consultation have been reviewed and summarised in this report, along with full responses from the applicant and its consultant team. This report is submitted in support of a detailed planning application for the proposed development as defined in paragraph 1.1 and set out in further detail the level of pre-application engagement undertaken on the proposals, the feedback received from residents and consultees, and the nature of the scheme.

2 PROPOSED DEVELOPMENT

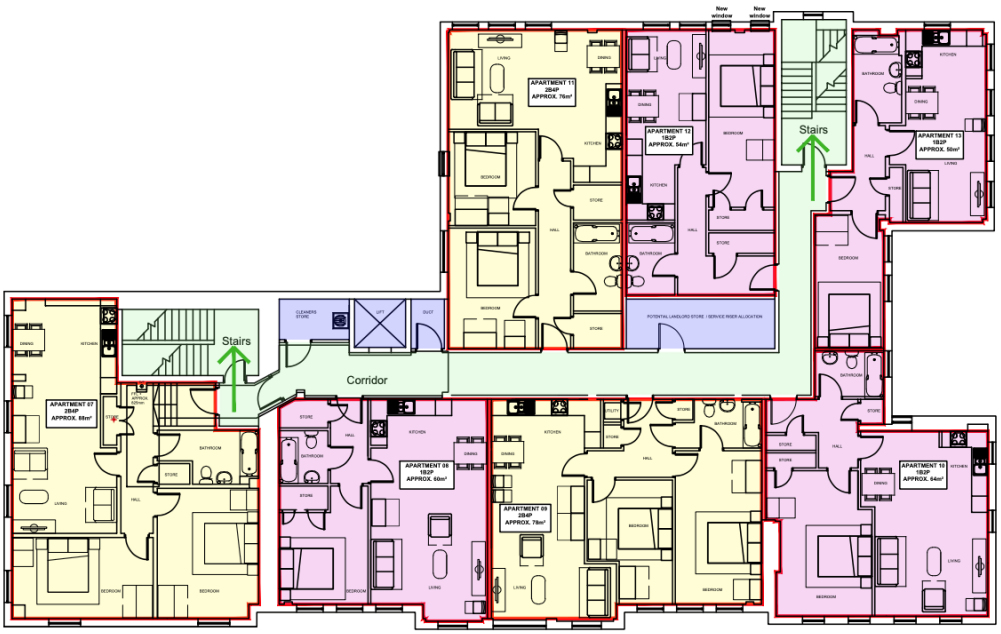
2.1 The Applicant is proposing to secure consent for the change of use of the existing property from office to residential. The scheme in question proposes a mixture of 23 apartments, comprising of 9 no. two bedroom, four person units, 13 no. one bedroom two person units and 1 no. one bedroom one person unit. The description of development reads as follows;

> "*Change of use of from offices (class E) to residential (class C3), comprising of 23 flats, including replacing* existing shop front windows with new domestic sized windows, installing new window openings and the erection of fencing and gates to the bike store and bin store."

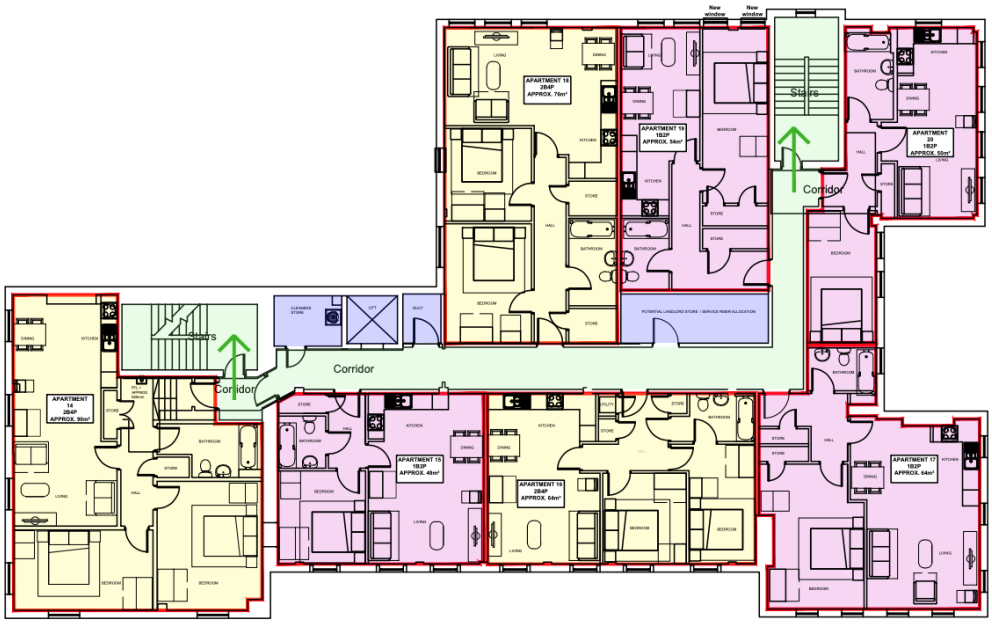
2.2 The development proposes to retain the site access arrangements as per the existing. Details of the proposed floor plans are included below for ease of reference, and details of the design and access arrangements are contained within the attached Planning, Design and Access Statement submitted within his application.



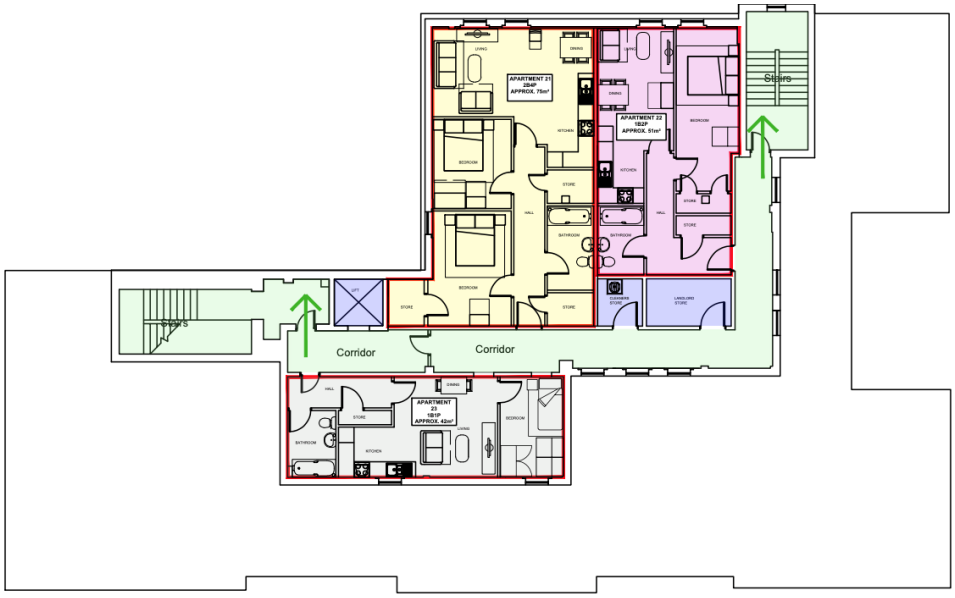
Proposed ground floor plan



Proposed first floor plan



Proposed second floor plan



Proposed third floor plan

2.3 The scheme does not necessitate extensive alterations to the built fabric and external appearance of the site, with the only external changes comprising of minor fenestration alterations at ground floor level on the site frontage.

2.4 The scheme proposes an effective and efficient use of the site, and will deliver the appropriate access, drainage, ecological and noise measures to meet the needs of the development, and without causing harm to the character and amenity of the existing building and neighboring properties of the wider city centre. In fact, the scheme could help to support the vitality and viability of the shopping street through the contribution of additional footfall both during daylight and evening hours, offering a significant benefit to the local economy.

3 PLANNING LEGISLATION AND GUIDANCE

3.1 As set out at Section 1, this PAC report has been prepared in accordance with Part 1A Section 2F of the Planning (Wales) Act 2015, and demonstrates how the applicant has complied with Section 61Z of the 1990 Act. For clarity it can be confirmed that the relevant provisions of the aforementioned Acts state as follows:

Part 1A Section 2F of the Planning (Wales) Act 2015

*"**2F.—**(1) Where an applicant has been required to carry out pre-application consultation in accordance with the provisions of section 61Z of the 1990 Act and articles 2C and 2D and submits an application for planning permission, that application must be accompanied by a pre-application consultation report which gives particulars of—*

(a)how the applicant complied with section 61Z of the 1990 Act;

(b)any response to the consultation received from any person consulted under section 61Z(3) or (4) of the 1990 Act; and

(c)the account taken of those responses.

(2) The pre-application consultation report must include—

(a)a copy of the notice referred to in article 2C(1)(a)(i);

(b)a declaration that the notice referred to in article 2C(1)(a)(i) was displayed in accordance with the requirements of that article;

(c)a list of the addresses of persons who were given notice of the proposed application in accordance with article 2C(1)(a)(ii) and a copy of the notice given to such persons;

(d)copies of all notices given to community consultees and specialist consultees in accordance with articles 2D(2) and 2D(3);

(e)a summary of all issues raised by any person notified of the proposed application in accordance with section 61Z(3) of the 1990 Act and articles 2C and 2D(2), including confirmation of whether the issues raised have been addressed, and, if so, how; and

*(f)copies of all responses received from specialist consultees with an explanation of the account taken of each response.**]***

Section 61Z of the Town and Country Planning Act 1990

"61ZWales: requirement to carry out pre-application consultation

(1)This section applies where—

(a)a person (the "applicant") proposes to make an application for planning permission for the development of land within the area of a local planning authority in Wales, and

(b)the proposed development is development of a description specified in a development order.

(2)The applicant must carry out consultation on the proposed application in accordance with subsections (3) and (4).

(3)The applicant must publicise the proposed application in such manner as the applicant reasonably considers likely to bring it to the attention of a majority of the persons who own or occupy premises in the vicinity of the land.

(4)The applicant must consult each specified person about the proposed application.

(5)Publicity under subsection (3) must—

(a)set out how the applicant may be contacted by persons wishing to comment on the proposed development;

(b)give such information about the proposed timetable for the consultation as is sufficient to ensure that persons wishing to comment on the proposed development may do so in good time.

(6)For the purposes of subsection (4), a specified person is a person specified in, or a person of a description specified in, a development order.

(7)Subsection (2) does not apply—

(a) if the proposed application is an application under section 293A, or

(b) in cases specified in a development order.

(8) A development order may make provision about, or in connection with, consultation required to be carried out under this section (including by way of publicising an application under subsection (3)).

(9)That provision may include —

(a)provision about how the consultation is to be carried out (including about the form and content of documents, and information and other materials that are to be provided to a person for the purposes of, or in connection with, the consultation);

(b)provision about responding to the consultation (including provision requiring a person consulted to respond to the consultation, or to respond to the consultation in a particular way, or to respond within a particular time);

(c)provision about the timetable (including deadlines) for consultation;

*(d)provision for a person consulted by virtue of subsection (4) to make a report to the Welsh Ministers about the person's compliance with any requirement imposed by virtue of paragraph (b) or (c) (including provision as to the form and content of the report and the time at which it is to be made).**]**"*

Pre-application Community Consultation: Best Practice Guidance for Developers (December 2021)

3.2 The above referenced guidance note confirms that from the 1st August 2016 applicants proposing major development were required to show how they had adhered to the new consultation requirements as part of their planning application submissions.

3.3 The guidance note confirmed that the statutory requirements laid out within the legislation set out a number of consultation activities that need to be undertaken by the developer before they can submit their planning application. These requirements include:

- Making draft planning application documents available to view;
- Notifying the right consultees of the consultation;
- Providing a minimum 28-day consultation period; and
- Reporting how the pre-application consultation was undertaken and how people's views were considered in a 'Pre-Application Consultation Report' submitted as part of the application.

3.4 The guidance goes on to confirm that good engagement is more than a simple box ticking exercise, and that the engagement can occur in many formats. The guidance confirms that when executed well, engagement should increase the level of transparency, develop relationships, and shape the project by considering and responding to feedback.

3.5 The guidance is noted to go on to set out more detailed consultation strategies, for all those who the applicant seeks to engage with.

3.6 It is our view that the pre-application consultation undertaken with local residents and other statutory parties has been positive, productive, and compliant with the relevant provisions of the above Acts and guidance.

4 PRE-APPLICATION CONSULTATION PROCESS

4.1 In accordance with the provisions laid out at section 3 of this report, a full draft of the planning application was prepared, including plans, supporting documents and application forms, and made available for viewing at the following website address:-

https://www.16lordstreetconsultation.co.uk

4.2 The consultation was publicized by the following means:

1) Site Notices in both English and Welsh (see Appendix 1 for a copy of the notices, and a map of where the notices were placed) displayed at the property for the minimum 28-day period; These were displayed from the 8th December 2024.

2) Letters posted to nearby neighbours in both English and Welsh (circa 50m radius from the site) enclosing a copy of the site notice (see Appendix 2 for a copy of the letter and appendices 3 for a list of addresses). These were sent out to consultants on the 8th December 2024.

3) Letters sent by post/email to statutory and specialist community Consultees in both English and Welsh enclosing a copy of the site notice (see Appendix 2); These were sent out to consultants on the 8th December 2024.

4.3 In accordance with the requirements of Part 1A of the Town and Country Planning (Development Management Procedures) (Wales) (Amended) Order 2016, it is declared on behalf of the County Council that the notice was displayed correctly and for the requisite timescale.

4.4 Community Consultees comprised the following:-

a) Local Ward councillor for Rhondda Parish Ward, Marc Jones

b) Public Protection Team, Trading Standards, Housing and Public Protection Department

c) Dwr Cymru Welsh Water

d) Natural Resources Wales

4.5 Specialist Consultees comprised:

a) The Coal Authority

b) Fire and Rescue

c) Highways

4.6 Comments could be submitted in response to the consultation via email or post to The Leith Group offices (details as shown on the website)

5 CONSULTATION FEEDBACK AND RESPONCES

5.1 It can be confirmed that at the end of the consultation period, which ran from the 8th December 2024 and officially ended on the 12th January 2025, there had been a total of 0 responses from neighbours contacted in relation to the development proposals. We ran the consultation above the 28-day minimum period to allow for all consultee responses to be received and addressed prior to submitting this application.

5.2 We also want to address that one statutory consultee was initially missed off our email list. As a result, we consulted with highways on the 14th January 2025, and ensured that we provided the statutory 28-day minimum period to allow for their comments to be received.

5.3 In addition, we can confirm that the results of the engagement with the community consultees was overwhelmingly positive, with the feedback confirming Members support for the proposed development as a matter of principle.

5.4 To date, we can confirm that there has been no correspondence received from neighboring properties on the scheme.

5.5 In relation to statutory consultees, as detailed at section 4, a number of statutory bodies were consulted at pre-application stage, with a total of 7 bodies being notified of the proposals. These have been listed as part of section 4 of this document.

5.6 To date it can be confirmed that we have received 4 responses from the 7 consultees we reached out to. As a result of these responses, we have ensured that any queries and requests have been addressed as part of and within this application submission. Extracts of these responses, and how we have addressed them have been detailed below;

The Coal Authority

5.7 The coal Authority were consulted on the basis of the site being within their defined Development Low Risk Area. The coal authority had confirmed within their response received 11th December 2024 that they had no specific comments to make in regards to this site and this application. Their response reads as follows;

> *We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority's defined Development Low Risk Area. On this basis we have no specific comments to make. However, in the interest of public safety, it is requested that the Coal Authority's Standing Advice note is drawn to the applicant's attention, where relevant.*

Dwr Cymru Welsh Waters

5.8 Dwr Cymru Welsh waters were consulted based on ensuring that the capacity of their drainage networks could accommodate this new development. We received comments from the Dwr Cymru Welsh Waters on the 19th December 2024. Dwr Cymru Welsh waters provided the following responses.

> *Public Sewerage Network*
>
> *The proposed development site is located in the immediate vicinity of a combined public sewerage system which drains to Five Fords Wastewater Treatment Works (WwTW).*
>
> *Surface Water Drainage*

As of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – _designing, constructing, operating and maintaining surface water drainage systems'. As highlighted in these standards, the developer is required to explore and fully exhaust all surface water drainage options in accordance with a hierarchy which states that discharge to a combined sewer shall only be made as a last resort. Disposal should be made through the hierarchical approach, preferring infiltration and, where infiltration is not possible, disposal to a surface water drainage body in liaison with the Land Drainage Authority and/or Natural Resources Wales.

Foul Water Drainage – _Sewerage Network

We have considered the impact of foul flows generated by the proposed development and concluded that flows can be accommodated within the public sewerage system. We advise that the flows should be connected to the combined sewer between manholes SJ33503405 and SJ33503403 located in Egerton Street to the east.

5.9 As shown within the submitted drainage strategy, the foul flows have been connected to the combined sewer in-between the manholes suggested by Dwr Cymru Welsh Waters, and as such the strategy itself is in line with their advice.

Should a planning application be submitted for this development we will seek to control these points of communication via appropriate planning conditions and therefore recommend that any drainage layout or strategy submitted as part of your application takes this into account. However, should you wish for an alternative connection point to be considered please provide further information to us in the form of a drainage strategy, preferably in advance of a planning application being submitted.

5.10 Overall, and taking into account the points raised by Dwr Cymru Welsh Waters, we have presented a scheme that will have a very minimal impact upon the existing drainage network and sewage system, as shown within our Drainage Strategy and Drainage Technical note. We have also ensured that our drainage strategy is in line with the advice provided by Dwr Cymru Welsh Waters. Finally, we are open to discussions with the council around securing appropriately worded planning conditions regarding the drainage layout and strategy, where necessary.

Environmental Health

5.11 We received comments from the council's Environmental Health Team on the 19th December 2024. Their comments read as follows;

The report has shown that the noise levels all fall within Noise Exposure Category (NEC) B and therefore mitigation is required. The report has identified road traffic as the dominate noise and proposed mitigation to protect the amenity of the future occupants. However, there appears to have been no consideration of the night time economy on the proposal. It is noted that the monitoring exercise was carried out on Wednesday 10th July. Wrexham centre sees a notable increase in the night time economy at the weekend along with the associated people noise, including those passing the proposal on route to the bus station. it is also noted that there is a licensed premises in very close proximity to the proposal.

So as to carry out a robust consideration of the environmental noise levels a consideration of the Night time economy is required along with the associated noise which should be completed over a weekend. There should also be a discussion of any music that may be recorded with emphasis on any bass element that may be present. In which case a detailed assessment of the mitigation proposed should be included which demonstrates any attenuation for low frequency noise.

5.12 The Council's Environmental Health Officer (EHO) has established that the noise report we consulted on did not take into consideration the impact of noise from the nighttime economy in Wrexham at the weekend, especially in regards to noise caused from people passing by the proposal to get to the bus station across the road from our site.

5.13 Further discussions were had between the EHO and our Noise Consultant (Phlorum Ltd), in which specific concerns were raised in regard to the licensed venue 'The Elihu Yale (Weatherspoon's Pub)' around the corner from the site, and Vasca Da Gama, which occasionally applies for a late night licence at the weekend. The EHO wanted to better understand the impact of noise from venue goers at these establishments upon potential occupants at the weekend. As such, the EHO had requested that a further noise survey is conducted at the weekend to address the above matters.

5.14 Following further discussions with our Noise Consultant (Phlorum ltd), it was agreed that we would provide further comments to the EHO regarding the necessity for the additional noise survey. This response was drafted and sent by our Noise Consultant to the EHO on the 16th January, and reads as follows;

Thanks you for finding the time to discuss the noise issues for the residential application at 16 Lord Street, Wrexham.

Further to our discussions we will update our noise report on the issues raised and we would also like to discuss the need for an additional weekend noise survey.

As discussed, The nearest licensed premises is The Elihu Yale (Weatherspoons) with the entrance on Regent Street and this venue does not have music. Furthermore, the entrance does not have a line of sight to the proposed development.

The other premises that was discussed was Vasca Da Gama, which occasionally applies for a late night licence at the weekend. However, a weekend survey may not coincide with one of these events.

On this basis it is unlikely that music noise will be present at the development site at the weekend.

I understand your comment paraphrased as 'Wrexham town centre is quiet in midweek but busy at the weekend' and it is reasonable to assume that the night-time noise climate due to a busier town centre from additional footfall and people noise in the late evening would be higher at the weekend than in the mid-week period when we undertook the baseline noise survey.

However, the noise mitigation measures shown in the noise report have included a margin of safety in our glazing specification of between 3 to 5 dB and it is considered that this should provide sufficient sound insulation for any increase in footfall and associated people noise at the weekend. If required, we could further increase the glazing (and ventilation) acoustic specification if you consider that a 3 to 5 dB margin of safety is not sufficient.

5.15 Having reviewed the additional information, we received further confirmation from the EHO on the 18th march 2025 that they would support the changes being made to the Noise report, and based on the additional information we provided, they would now recommend that the report and its contents be supported for planning.

5.16 As such, we have provided and submitted a revised version of the Noise Impact Assessment. The report now includes a review of the night-time economy in Wrexham at Weekends, and how the current glazing specifications proposed will mitigate any potential rise in footfall noise. As the report suggests, a margin of safety in the glazing specification of between 3 to 5 dB has been included to provide sufficient additional sound insulation for any noise increase due to additional footfall and associated people noise at the weekend.

5.17 To clarify, we are open to further discussions on the matters of a further Noise Survey. However, it is our understanding that this would be unnecessary given the support from the EHO, and given the high level of glazing proposed for the scheme to mitigate any increase in noise at the weekends.

5.18 Further to above, the EHO initial comments addressed concerns in regards to Plant noise. Their comments read as follows;

There are also some fast-food retailers in close proximity to the proposal and a consideration of any associated plant noise should be considered.

5.19 The initial noise survey did not identify any harmful impacts from surrounding mechanical services from nearby fast-food retailers, and as a result no additional noise mitigation measures are required. We have provided more specific comments in the revised Noise Assessment, submitted with this application, to address this point.

5.20 Finally, the initial comments received by the EHO on the 19th December 2024 included some suggested conditions relating to Dust Management and Minor Demolition Construction Noise. We would be more than happy to include these conditions within a decision notice.

DUST MANAGEMENT

The Applicant is advised that under the dust from construction and / or demolition activities can be judged to be causing a statutory nuisance to neighbouring properties. A legal notice can be served requiring that any dust nuisance is abated, and failure to comply with the requirements of the noise can result in prosecution. The applicant should contact the Council's Environmental Health & Housing Standards Team on healthandhousing@wrexham.gov.uk or 01978 292040 for further advice and information

MINOR DEMOLITION CONSTRUCTION NOISE
All works in relation to the implementation of this permission, including deliveries to and /or leaving the site, should be undertaken only between the hours of 07.30 to 18.00 Monday to Friday, 08.00 to 14.00 on a Saturday, and at no :me on a Sunday or a Bank Holiday. Outside these times, any works which are audible beyond the site boundary have the potential to cause unreasonable disturbance to neighbouring premises.

Natural Resources Wales

5.21 We received comments from Natural Resources Wales on the 17th January 2025, and providing comments in regards to the ecological and drainage reports associated with this application. Their comments read as follows;

Protected Species
We have reviewed the following ecological reports submitted in support of this Statutory PreApplication Consultation:

- *Lovatt, K., June 2024, Daytime Building Inspection, Reference P.2006.24, Ascerta Ein cyf/Our ref: CAS-270836-Y2M2 Eich cyf/Your ref: LPL911B*
- *Lovatt, K., July 2024, Bat Nocturnal Survey, Revision A updated 08/11/2024, Reference P.2006.24, Ascerta*

Section 4.3 of the Daytime Building Inspection report states that "Overall, the building is classified as having low bat roosting potential" and Table 4.6 states that "One nocturnal bat activity emergence survey is required".

Section 5.0 of the Bat Nocturnal Survey report states that no bat activity was recorded during the subsequent emergence survey. However, the report also states that due to the building having potential for supporting bat roosts, if works have not begun by June 2026 further assessment may be required. We concur with this approach.

From the information submitted, we consider that the proposed development represents a lower risk for bats, as defined in our guidance document 'Natural Resources Wales Approach to Bats and Planning (2015)'. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended).

As this is a lower risk case for bats, we consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.
Furthermore, we advise that the proposed development is not likely to harm or disturb bats or any breeding sites and resting places at this site, provided the avoidance measures described in the bat report are implemented.

If consulted by the Local Planning Authority (LPA) as part of a subsequent planning application, we would advise the LPA that the above reports should be included within the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

5.22 NRW raised no concerns regarding the ecological reports submitted with the application.

Protected Sites and Foul Drainage

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). Under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments.

This application proposes connection of foul water to the mains sewer. Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for the Planning Authority to determine.

We therefore advise you to discuss the application with Wrexham County Borough Council as they will need to consider whether the development is likely to have a significant effect on the SAC. Should they determine that an Appropriate Assessment is required, you will then need to submit whatever evidence they deem appropriate to demonstrate no adverse effect on site integrity.

5.23 As stated in the response from Dwr Cymru Welsh Waters shown above, there are no present drainage concerns raised regarding the change of use of this property. As such, it has been considered that the Drainage Strategy and technical report submitted with this application will not have a negative impact upon the water quality within the SAC river catchment.

Local Highways Authority

5.24 As stated in paragraph 5.2 of this report, the Local Highways Authority were initially and accidentally missed off our mailing list when the consultation period began on the 8th December 2024. As a result, the Highways Authority were not consulted on this application until the 14th January 2024, and the application was not submitted until the 12th February to allow them the minimum 28-day consultation period to issue their response. We also ensured that the website remained live throughout this period and for the documents to remain available to view online.

5.25 We did not receive a formal response from the Highways Authority until the 31st March 2025. To ensure they had everything they needed to provide feedback on the application, they were provided with all the drawings for the scheme, and were made aware that they could request any further documents for review if needed.

5.26 The comments from highways have been summerised below, and addressed as follows;

> *We have reviewed the preliminary application to convert the existing office block to residential.*
>
> *To enable the Local Highway Authority to appraise the proposal fully, and provide a formal consultation response to a full planning application the applicant should provide the following details:*
>
> - *Full scaled drawings and details showing secure lockable long term cycle parking in accordance with LPGN16. (The area shown on the initial sketch plan looks inadequate as 2 spaces per flat are referred to in the Guidance Note).*

5.27 We acknowledge that in accordance with the council's own guidance for cycle parking, which was adopted in July 2018, that there is an expectation for new residential developments to provide 2 cycle parking spaces per dwelling. In the case of this scheme, this would equate to 46 secure cycle parking spaces for the scheme. However, given the sustainable and accessible location of this site, we would consider this provision to be excessive.

5.28 The guidance note referred to by the Highway's officer, and especially LPGN16, was adopted 7 years ago. The guidance does not decipher minimum standards based on the location of the development, where our site is located in the Centre of Wrexham town in close walking proximity to many public transport services.

5.29 The town Centre bus station is located across the road from our site, which provides local and regional service routes within Wrexham, North Wales, and into Cheshire and Shropshire. The site is also within a 10-minute walk of both train stations in Wrexham, which collectively offer services to various destinations across North Wales, including Shrewsbury and Chester. There are also multiple taxi service providers in the town centre, alongside various town centre services and facilities such as retail shops, convenience stores, food and drink establishments and health care centres.

5.30 Given the highly sustainable nature of the site being within walking distance of all the above services, we would consider the requirements of 2 cycle parking spaces per dwelling to be excessive and would consider a smaller provision for our scheme to be more appropriate.

- *Full scaled bin store proposals demonstrating with bin sizes and recycling options that there is adequate space designated with good access for refuse collection. Confirmation that the applicant proposes a private arrangement for collection rather than via WCBC's own collection as is more common for apartment schemes would be appreciated.*
- *An entrance/entrances fully compliant with mobility standards should be detailed and proposed.*
- *Explanation of a clear access for cyclists and bins to and from the cycle parking and refuse area, as the currently proposed 2 sets of doors and a porch area to access through may be challenging for cyclists to access.*

5.31 As shown within the attached drawings pack, we have provided adequate space within the scheme to accommodate bin storage for the scheme. We would consider that any further details pertaining to access and collection of waste would be secured by a well-worded pre-commencement condition on the decision notice.

- *Active Travel proposals to justify any shortfall in parking arrangements.*

5.32 In accordance with Policy 12 of *Future Wales*, planning authorities are encouraged to reduce car parking provision in urban areas, including supporting car-free developments in locations that are accessible and sustainable. The principle of a car-free development on this site was also supported in the pre-application advice provided under reference ENQ/2023/0090. Given the site's sustainable and accessible location, the absence of on-site parking is therefore considered appropriate.

- *A Construction Traffic Management Plan demonstrating how the construction phase can be managed with minimal impact upon the surrounding highway will be required. This is normally conditioned prior to commencement of any works.*

5.33 We have no objection to the recommended pre-commencement condition requiring the submission of a Construction Traffic Management Plan for this scheme.

- *A full schedule of accommodation and population/floor area will be required and demonstration of proposed encouragement to use public transport required. This often take the form of a Travel Plan including associated measures to encourage active/sustainable travel.*

5.34 A full schedule of accommodation has been provided within the drawing pack submitted with this application. Furthermore, the car-free nature of the scheme will be clearly communicated through the sales and letting process, ensuring that all future occupants are fully aware of the absence of on-site car parking from the outset.

- *Surface Water Drainage arrangements would require the approval of the SAB officer typically, although this would be outside the realms of the planning process, as a technical matter.*

5.35 Drainage details have been submitted as part of this application. As discussed in paragraphs 5.9, DWCC were consulted on this application, and the suggested drainage strategy submitted is considered to be in line with their recommendations.

Fire and rescue

5.36 The Fire and Rescue Department, as stated in appendices 3, consulted on the 8th December 2024 with our consultation letter and link to our website. Following the end of the consultation period, we received no response back from Fire and Rescue in regards to this proposed scheme. We do however welcome any feedback from the Fire and Rescue Department in respect of this application.

Local Ward Councilor

5.37 The Local ward councilor, as stated in appendices 3, was consulted by mail on the 8th December 2024 with our consultation letter and link to our website. Following the end of the consultation period, we received no response back from the Local Ward councilor in regard to this proposed scheme. We do however welcome any feedback from the Ward Councilor in respect of this application.

6 CONCLUSIONS

6.1 As required by the Development Management Procedure Order (2016), the planning application was published in draft in accordance with the regulations. Consultations have been undertaken, and any responses received have been addressed in this PAC report and the suite of documents submitted with this application.

6.2 The key matters raised within our draft submission focused on Highways, Drainage, Ecology and Noise. Having reviewed the responses received at pre-application Consultation stage, the scheme has been finalised for submission to reflect and address the relevant provisions as necessary.

6.3 This report is prepared in accordance with Part 1, Section 2F of the 2016 order, and demonstrates how the applicant has complied with Section 61Z of the 1990 Act, and how they have responded to the comments received from those interested parties concerned.

6.4 In accordance with the above, it is considered that the requirements of Part 1, Section 2C, 2D, 2E and 2F of the order have been satisfied and the application can be accordingly validated and approved by Wrexham County Borough Council, subject of any necessary and appropriately worded planning conditions.