Cefn Park

Land east of Cefn Road, Wrexham



Pre-Application Consultation Report

Prepared on behalf of Harworth Group

February 2025

Ref. J10-HE-PACA-RevB

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1.0 Overview

This Pre-Application Consultation (PAC) report has been prepared by Lexington and J10 on behalf of Harworth Group, hereby known as the 'Applicant', to support the submission of an Outline planning application for the residential development on the land referred to as Cefn Park:

"Proposed phased residential development for the construction of up to 900 residential dwellings with associated infrastructure (playing fields, open space and SuDS attenuation) with all matters reserved except for detailed means of primary highway access".

The proposal site is located east of Cefn Road in Wrexham, south of Wrexham Rugby Club.

The Applicant's proposal forms part of Key Strategic Site Two (KSS2) within Wrexham's adopted Local Development Plan, which allocates KSS2 for up to 1,680 new homes. The proposals would provide up to 900 of these homes on the southern parcel of the site, south of Bryn Estyn Road along with a range of community infrastructure improvements and facilities.

Ahead of submitting a planning application to Wrexham County Borough Council, the Applicant has undertaken a public consultation on the plans, which this Pre-Application Report outlines.

Accordingly, the purpose of this supporting statement is to:

- explain the statutory pre-application process;
- discuss the benefits of consultation;
- review the DMO pre-application process;
- identify the key issues and matters raised by consultees; and
- demonstrate how the Applicant has sought to respond to the consultation feedback and how the proposed development might have changed, been shaped and informed by this process.

We consider that this document will serve to demonstrate that the Applicant has followed a rigorous and robust method of engagement which has helped shape the proposals and been embraced by the Applicant; but also, a process that has generated positive responses from consultees.

The Applicant believes that this report, in association with all the other supporting statements and drawings linked to this submission, will assist and provide the Local Planning Authority with a clear basis for interpretation and decision making.

1.1 Pre-Application Consultation

The Applicant is committed to community consultation and engagement with stakeholders and residents and has instructed Lexington, a specialist communications consultancy, to undertake a robust pre-application consultation and engagement programme.

On behalf of the Applicant, Lexington and J10 Planning carried out a comprehensive pre-application consultation programme in accordance with national and local guidelines (outlined in Section 2.0).

This pre-application consultation exceeded the 28-day requirement, running between Friday 5th April and Thursday 7th May 2024 and included two online webinars to allow attendees to virtually meet with members of the project team and ask any questions that they may have.

To ensure that as broad an audience as possible was engaged with, a virtual exhibition was also available throughout the consultation period on the dedicated consultation website. The virtual exhibition delivered an inclusive and digital-led consultation, within the statutory requirements, and included a wide array of information on the proposals for interested members of the public to view.

1.2 Conclusions

This report outlines the methods used to engage with politicians, the public and the press. It also summarises the feedback received from respondents and provides the Applicant's responses to pertinent issues raised during the consultation.

Overall, this Pre-Application Consultation Report demonstrates how:

- The Applicant has met the requirements for the statutory 28-day pre-application public consultation.
- The Applicant has gone beyond these requirements by including non-statutory elements such as a virtual exhibition and a community leaflet.
- In total, 101 pieces of feedback were received during the consultation from members of the public.
- Responses have been varied, covering a broad range of topics relating to the development, including:
    - The impact on local infrastructure
    - The impact on traffic and the local road network
    - The loss of green space and the environmental impact
    - The layout and design of, and access to, the development
    - The affordability of the development

A full breakdown of the feedback gathered during the consultation is outlined in Section 5.0 of this document and Section 6.0 provides a response to all comments received.

The Applicant is confident that the feedback received has been addressed in this report that will be submitted alongside the planning application to Wrexham County Borough Council.

2.0 Legislative Requirements : Role of Community Involvement

Planning guidance states that pre-application consultation with communities, local authorities and statutory consultees can bring several benefits to the process of determining planning applications. Against this background, the Applicant has sought to consult with interested parties by closely following policy and guidance concerning community involvement in the planning system.

2.1 The Localism Act 2011

The Localism Act 2011 seeks to provide the local community with a voice throughout the planning process, highlighted in the former Department for Communities and Local Government's paper, Decentralisation and Localism Bill: an essential guide, which outlines one of its principles as:

"*Empowering communities to do things their way – by creating rights for people to get involved with, and direct the development of, their community*."

Elaborating on this, the Localism Act outlines that applicants must notify the local community about their proposals to "*bring the proposed application to the attention of a majority of the persons who live at, or otherwise occupy, premises in the vicinity of the land*."

It goes onto state that the publicity must explain how the applicant can be contacted by those "*wishing to comment on, or collaborate…on the design of, the proposed development*" and that applicants must consider the feedback received by having "*regard to any responses to the consultation*."

2.2 Welsh Government Planning Policy and Guidance

In 2016, the Welsh Government began to implement key elements of the Planning (Wales) Act 2015 with a requirement for developers to show how they had adhered to the new consultation requirements as part of their planning application submission.

As set out in Article 4 of Part 1A of The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, planning applicants must, for a period of no less than 28 days, before an application is submitted:

- Display a site notice in at least one place on or near the land to which the proposed application relates
- Write to any owner or occupier of land adjoining the land to which the proposed application relates
- Make the draft planning application information and environmental statement (where it is EIA development) available publicly and,
- Consult with community and specialist consultees before applying for planning permission.

The Development Management Order (DMO) process places a responsibility upon applicants to undertake and follow a pre-application procedure of formal consultation and engagement with key statutory consultees (e.g. NRW, DCWW, CADW, etc), the Local Authority (e.g. LLFA, Highway Authority), Town/Community Councils, local Ward Councillors, local residents and neighbouring businesses.

It applies to all Major applications (outline or detailed) where the project involves over 1,000 sqm of non-residential space and/or the site exceeds 1.0 ha or where the site involves 10+ residential dwellings and/or a site over 0.5 ha. Given the proposal exceeds these thresholds the DMO process duly applies.

Even before the DMO process was introduced in Wales, front-loading the pre-application stage, amongst many practitioners, became best practice and its benefits are recognised as adding value to the quality of a submission. Indeed, having been formalised into the statutory application process it is meant to save time and resources when one reaches the formal submission and determination stage of a proposal.

Against this background, the Applicant has sought to ensure that the engagement with the local community on the plans has adhered to the guidance outlined in the Localism Act 2011 and Welsh Government Planning Policy Guidance on consultation, as well as industry best practice.

2.3 Planning Policy Wales (PPW)

Edition 12 of Planning Policy Wales was published in February 2024 and sets out the land use planning policies of the Welsh Government. It ensures the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty.

It sets out key principles to planning and how schemes should be delivered, stressing the importance of involving communities in the process. Page 17, paragraph 3, states that to create accessible and healthy environments, schemes should:

"…involve and collaborate with others to ensure issues are understood and prevented at the earliest opportunity through effective engagement with those affected by or having an interest in the development concerned."

2.4 Our approach

The Applicant has sought to ensure that the engagement with the local community on the plans has adhered to the guidance outlined in the Localism Act 2011, the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, as well as industry best practice.

This document confirms to Wrexham County Borough Council that the above requirements have been undertaken for the proposed development on KSS2, land east of Cefn Road, Wrexham.

3.0 Statutory Consultation

The Applicant was committed to delivering a comprehensive consultation process that provided detailed information on the scheme and encouraged feedback from a broad range of stakeholders.

To that end, the consultation period commenced on Friday 5th April and lasted until Tuesday 7th May 2024, exceeding the statutory 28 days. During this time, a series of steps were undertaken to advise local residents and stakeholders about the consultation and ways to provide feedback.

This section of the report summarises the statutory elements of the consultation process that the Applicant has undertaken, in line with the Localism Act 2011 and the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016.

3.1 Site Notice

Schedule 1B Articles 2C and 2D were installed at publicly accessible locations around the proposal site on Thursday 4th April. The notices were in both Welsh and English and could be viewed without entering the site.

The notice was affixed at the following locations:

- 1) Bryn Estyn Road/Wrexham Rugby Club (coordinates: 53.054370, -2.959214)
- 2) Bryn Estyn Road (coordinates: 53.054366, -2.965158)
- 3) Thornleigh/Oakhurst (Coordinates: 53.053394, -2.967443)
- 4) Cefn Road - North (coordinates: 53.052489, -2.967797)
- 5) Cefn Road – South (coordinates: 53.045963, -2.964783)



Site Notice 1: Bryn Estyn Road/Wrexham Rugby Club

The notices contained the information set out in Schedule 1B of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. This provided passing pedestrians with specific information about the consultation, as well as highlighting the project's consultation website and the nearest public place (Wrexham Library, Rhosddu Rd, Wrexham, LL11 1AU) where the application documents could be viewed online.

Reasonable steps were taken throughout the 28-day statutory consultation period to protect the site notices and ensure that they were visible for the entire 28-day period.

A copy of the site notice and a map of the five locations where the notices were displayed can be found in **Appendix A**.

3.2 Public Display of Planning Documents

Prior to triggering the 28-day statutory consultation period, a dedicated consultation website – erlasparkconsultation.co.uk - was set up to host the draft application documents, background information, and to provide a further method of giving feedback.

The consultation website was made public on the first day of the 28-day consultation period, Friday 5th April 2024, providing an accessible format for the virtual exhibition as well as supporting documentation for the proposals. The website address was printed on site notices, consultee notice letters and other relevant correspondence.

The website included a 'Document Library', where links to electronic versions of the draft planning documents were made available to view. More information about the project website is available in **Section 4.2.**

These draft planning documents made available are listed below, and were all accessible via the project website:

- Accommodation schedule
- Acoustic Assessment
- Agricultural Land Quality
- Agronomy Report
- Air Quality Assessment
- Arboricultural Report
- Archaeological Desk-Based Assessment
- Design and Access Statement
- Ecological Assessment
- Ecological Impact Assessment
- Education Impact Statement
- Flood Consequence Assessment
- Geophysical – ARC
- Geophysical – Magnitude
- Geophysical WSI – Magnitude
- Geotechnical Report
- Health Impact Statement
- Heritage – Setting Assessment Report
- Heritage – Technical Note
- Heritage Impact Statement
- J10 – Notice – DRAFT
- J10 – Notice Letter – owners – DRAFT
- J10 – Notice Letter – WCBC Highways – DRAFT
- J10 – PA Covering Letter – DRAFT
- J10 – PA Forms – DRAFT
- J10 – PA Submission Schedule v1 – DMO DRAFT
- J10 – Planning Statement – April 2024
- J10 – Planning Statement Appendices – April 2024

- LVIA
- Minerals Prior Extraction Statement
- Phosphate Mitigation Strategy
- Sports Planning Statement
- Sustainability Statement
- Transport Assessment Appendices
- Transport Assessment Drawings
- Transport Assessment
- Transport Framework Travel Plan
- Utility and Services Study

A screenshot of the Documents Library page can be viewed in **Appendix B**.

3.3 Adjoining Landowners and Occupiers Notice

As part of the pre-application consultation programme, a notification letter was posted to the owners and occupiers of land which adjoins the site. The letters were hand-delivered to 121 neighbouring properties on the evening of Thursday 4th April 2024. For the 24 properties that could not be accessed on Thursday 4th, the remaining letters were sent Special Guarantee delivery on the morning of Friday 5th April.

The notification pack included the following information:

- A notification letter, giving an overview of the proposal, the Applicant's responsibility and commitment to consult with the community, the dates of the statutory consultation period, the project website URL, and ways to contact the project team.
- Site notice (Schedule 1B), in both Welsh and English.
- A community leaflet.

The letter was delivered to a total of 145 properties closest to the site. A letter informing residents of the upcoming consultation, copy of the site notice, and consultation leaflet was issued to owners/occupiers. A copy of the letter can be viewed in **Appendix C**.

3.4 Community Consultees Notice

As part of the pre-application consultation programme local community councils which cover, or sit adjacent to, the proposal site was sent a letter via email informing them of the consultation. This email was issued to the following Community Councils on the morning of Friday 5th April 2024:

- Abenbury Community Council
- Acton Community Council
- Caia Park Community Council
- Holt Community Council

The notification pack included the following information:

- A notification letter, giving an overview of the proposal, the Applicant's responsibility and commitment to consult with the community, the dates of the statutory consultation period, the project website URL, and ways to contact the project team;
- Site notice (Schedule 1B); in both Welsh and English.
- A community leaflet

A copy of the email and the consultee notice can be viewed in **Appendix D**.

3.5 Specialist Consultees Notice

As part of the pre-application consultation programme, notification was emailed to specialist consultees as set out in Schedule 4 of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. The email was issued on Friday 5th April 2024.

The email notified the statutory consultees of the consultation and the proposed development, the notices issued to ward councillors, community councils and local residents, as well as directing the recipients the bespoke consultation website and the full suite of technical documents and plans.

An email was delivered to the following specialist consultees:

- Wrexham Highways
- Wrexham LLFA / SuDS Approving Body
- Wrexham Housing
- Wrexham Education
- Wrexham Public Rights of Way
- Wrexham Ecology
- Wrexham Trees
- Wrexham Conservation
- Wrexham Environmental Protection
- Wrexham Planning
- Coal Authority
- Minerals Authority (c/o Flintshire County Council)
- Clwyd-Powys Archaeology Trust (CPAT)
- Cadw (Heritage in Wales)
- Welsh Government Rural Affairs
- Natural Resources Wales
- Welsh Water
- North and Mid Wales Traffic Authority – Traffic Wales
- Sport Wales

A copy of the email can be viewed in **Appendix E.**

4.0 Non-Statutory Consultation

In order to publicise the consultation further, and maximise participation, the Applicant undertook further promotional activities, which are outlined below.

4.1 Consultation Leaflet

A consultation leaflet was issued to the community around the proposal site to raise awareness of the public consultation, encourage participation and maximise the level of feedback.

The leaflet was hand-delivered to 1,374 residential and business addresses surrounding the site on the first day of the consultation, Friday 5th April, to inform residents of the plans and how to take part in the public consultation.

The four-page A5 leaflet, containing headings written in both Welsh and English, provided local residents with an overview of the development and encouraged them to find out more by visiting the project website.

A copy of the consultation leaflet and distribution area can be viewed in **Appendix F.**

4.2 Consultation Website

Prior to triggering the 28-day statutory consultation period, a dedicated consultation website – https://erlasparkconsultation.co.uk/ - was set up to host the planning documents outlined in Section 3.2, as well as provide background information and provide a further method of giving feedback. The website included the following information:

- How residents could register their interest in a new home at the site
- Information about the consultation period
- Information about the date and times of the webinars
- Overview of the proposals and the benefits to the local area
- Information about the site location and its allocation for housing within the Local Development Plan
- Virtual Exhibition room
- Site considerations and links to all technical documents
- Information on how residents could submit their feedback and an accompanying feedback form
- Information about Harworth

More information about the virtual exhibition can be found in Section 4.3. Each page of the site can be viewed in **Appendix G**. The website was visited 5,635 times during the consultation period.

Individuals unable to access the internet or to view the website were able to request physical copies of all consultation materials by dialling the community information line or by contacting the consultation email address.

4.3 Virtual Exhibition

A virtual exhibition was hosted on the project website, presenting the proposals in an engaging and interactive way. The virtual exhibition hosted a series of boards, navigated by the user clicking and scrolling around a virtual room.

Eight boards provided detailed information, including:

- Introduction to the proposals and Harworth Group
- The evolution of the design since the last consultation
- The site map and illustrative masterplan
- The specifics of the Applicants' proposals;
- Site considerations and the Applicant's approach to specific issues raised;
- Design principles
- Information about the scheme's site-specific benefits;
- Instructions on how to submit feedback as part of the consultation.

A screenshot of the virtual exhibition room, and copies of the display boards are also available in **Appendix H.**

4.5 Consultation Email Address

A dedicated email address, erlasparkconsultation@havingyoursay.co.uk was established to receive and respond to enquiries from the general public regarding the plans. A breakdown of the topics that the emails related to can be found in Section 5.3.

4.6 Community Information Line

A community information line (0333 358 0502) was provided throughout the course of the consultation to enable people to speak with members of the development team. It was established from the start of the consultation and was staffed from 9:00 am to 5:30 pm, Monday to Friday. An answerphone facility was available outside of office hours. The information line number was included in the letter issued to residents and local politicians. A log of the calls is provided in Section 5.0.

4.7 Community Leaders Engagement

Prior to the launch of the consultation, the Applicant sent a letter to key stakeholders to brief them about the proposals and to request a meeting. This letter was sent via email on Tuesday 2nd April 2024.

The recipients are listed below:

- Councillor Michael Morris – site (Holt) ward member
- Councillor Andy Gallanders – site adjacent (Rhosnesi) ward member
- Councillor Mike Davies – site adjacent (Rhosnesi) ward member
- Councillor Ronnie Prince – site adjacent (Cartrefle) ward member

None of the above listed stakeholders responded to engagement with a meeting request.

However, Councillors Andy Gallanders and Mike Davies responded via email to acknowledge receipt of the consultation materials.

A further statutory notification email was issued to these same Ward Councillors on 5th April 2024. A copy of both notifications can be found in **Appendix I.**

4.8 Social Media Advertisements

In order to allow Wrexham residents who live outside of the immediate vicinity to the proposal site an opportunity to learn more about the proposals and provide feedback, the Applicant published several advertisements on social media.

In total, these advertisements reached 26,494 people and were active between Thursday 11th April and Tuesday 7th May 2024. The advertisements resulted in 2,497 individuals clicking through to the consultation website.

A copy of the social media advertisements can be viewed in **Appendix J**.

4.9 Media Coverage

The consultation was also covered in the following media outlets.

- Wrexham.com 'Public Consultation launches on plans for 'up to 900 homes' on Cefn Road'
- Leader Live 'Wrexham: 900-home plan revealed for land by rugby club'
- Place North West 'Consultation opens for 900 new homes in Wrexham'

5.0 Feedback Received

Feedback was invited by telephone, post, email and online form. The details of how to submit feedback were provided on the project website, letters and leaflets distributed to the local community and stakeholders.

A total of 101 pieces of feedback were received during the public consultation, the majority of which comprised entries in the online feedback form. All of the feedback during the consultation feedback period has been considered. A summary of the format and feedback channels is in Section 5.1 'Feedback Channels'.

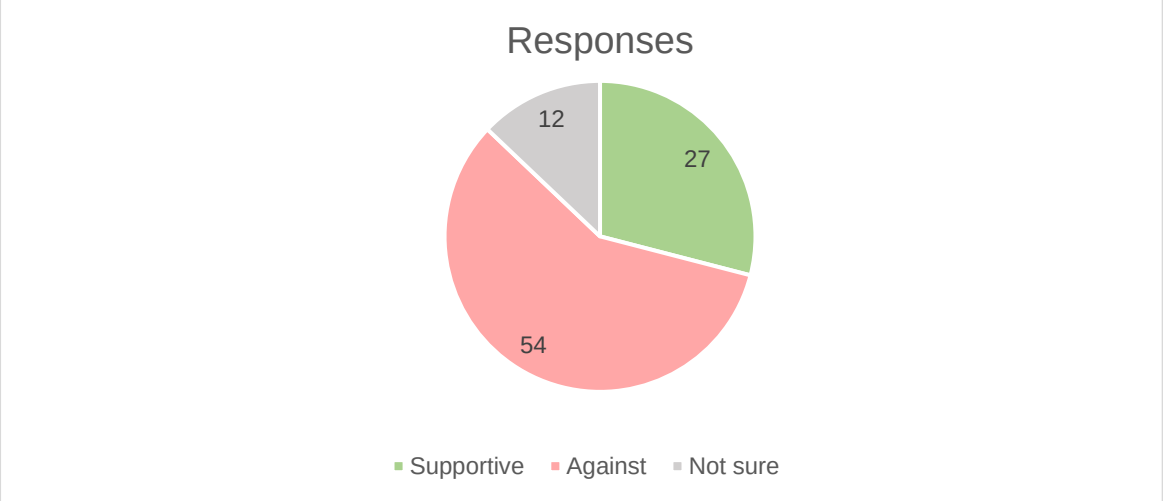
The Applicant is grateful to those who provided feedback on the proposals during the public consultation and a breakdown of the comments received is outlined in this section.

5.1 Feedback Channels

Format	Total
Email	12
Community Information Line	1
Registration of interest	24
Online feedback form	64
Total	**101**

In total, the number of responses to the consultation was around **7%** of the **1,374 local households** who were notified of the consultation via the community leaflet, which would appear to suggest a high level of acceptance to the principle of development locally. This is further supported by the volume of traffic to the dedicated website during the consultation period; it was visited **5,635** times, with just **64** people providing feedback.

An overview of the general feedback received is summarised in the below pie chart:



For this analysis, there were **24 expressions of interest in registering for new housing** and these have been duly interpreted as therefore being in support of the development.

Both email and telephone feedback has been considered and responded to within Section 6.0 'Response to Feedback'.

5.2 Community Information Line

The community information line, 0333 358 0502, was established at the beginning of the consultation and provided an opportunity for residents and stakeholders to speak to a member of the development team directly. The number was publicised in correspondence with residents and stakeholders and was provided on the project website.

Only 1 call was made to the line during the consultation period, which included the caller asking for clarity on what 'KSS2' meant on the map, and to notify us of their objections to the plans.

5.3 Email Correspondence

Local residents and stakeholders were also invited to contact the development team via email, with a project email address erlasparkconsultation@havingyoursay.co.uk established at the start of the consultation.

In total, **12 emails were received**. All senders received confirmation of receipt of their emails and were informed that their feedback would be included in the documentation submitted to the Council as part of the planning application.

Below is a chart demonstrating the topics and the quantity with which they appeared. A number of emails related to more than one topic, which is why the total frequency is larger than the number of emails received.

Topic	Frequency
Local infrastructure (education, healthcare, shops)	4
Local infrastructure (traffic and roads)	3
Loss of green space	1
Affordability of new housing	1
Layout, design and access	5
Environment and wildlife	6

5.4 Online Feedback Form

An online feedback form was made available on the project website (www.erlasparkconsultation.co.uk) for interested parties to give their views.

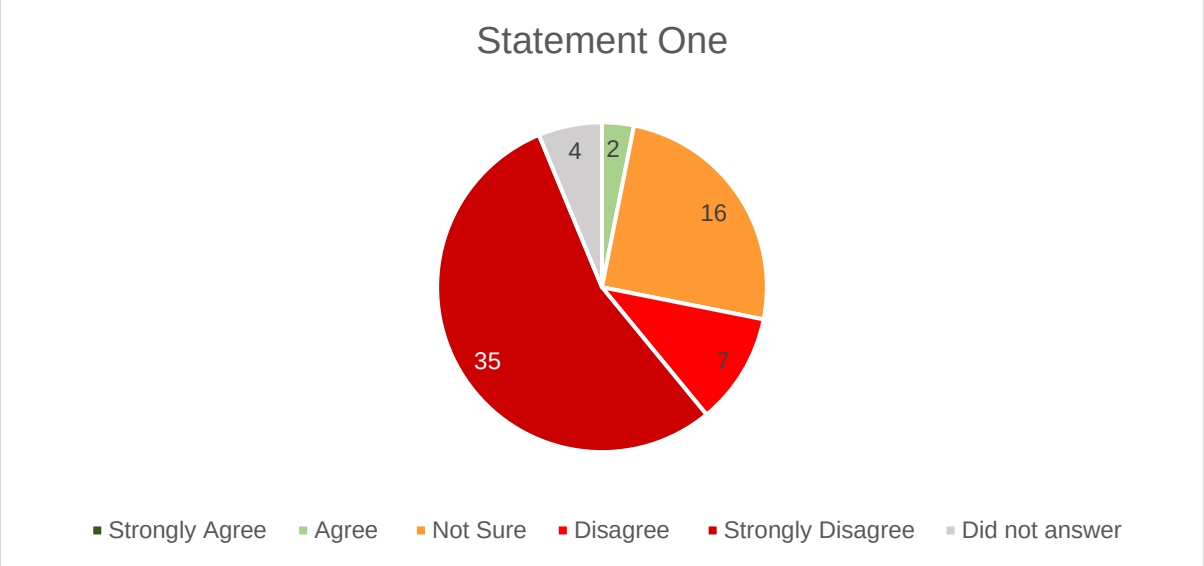
The form asked the respondents to state their opinion on the following four statements, with a "Likert Scale" of five responses, ranging from strongly agree to strongly disagree, available.

1) *The current proposals are an improvement on the initial scheme consulted on in 2022.*
2) *The plans will help to address the housing shortage in Wrexham by delivering high quality homes.*
3) *The benefits of the scheme, such as the primary school provision and sports pitches, will improve the local community.*
4) *The landscape led nature of the scheme will help to integrate new homes into the surrounding community.*

Following this, a text box was provided so that residents could provide further comments about the scheme and stated it could relate to the design of the scheme, or how residents thought we could support the local communities around Wrexham.

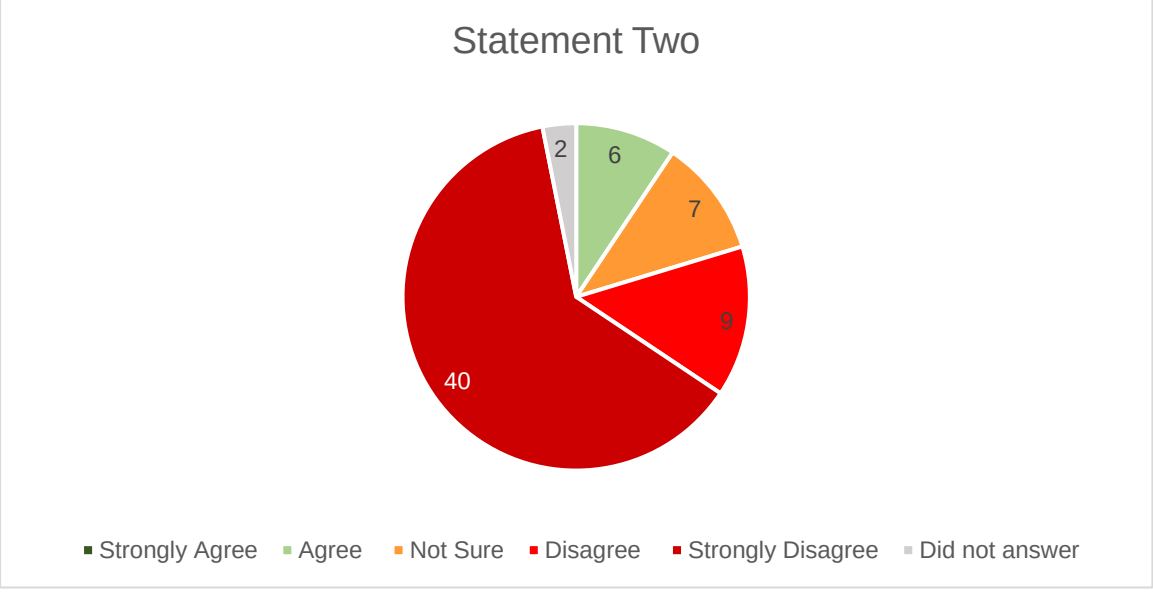
In total, **64 individual submissions through the online form** were received during the public consultation. All feedback forms and comments received via the online feedback form have been compiled and an analysis of these responses is outlined below.

Statement One: The current proposals are an improvement on the initial scheme consulted on in 2022.



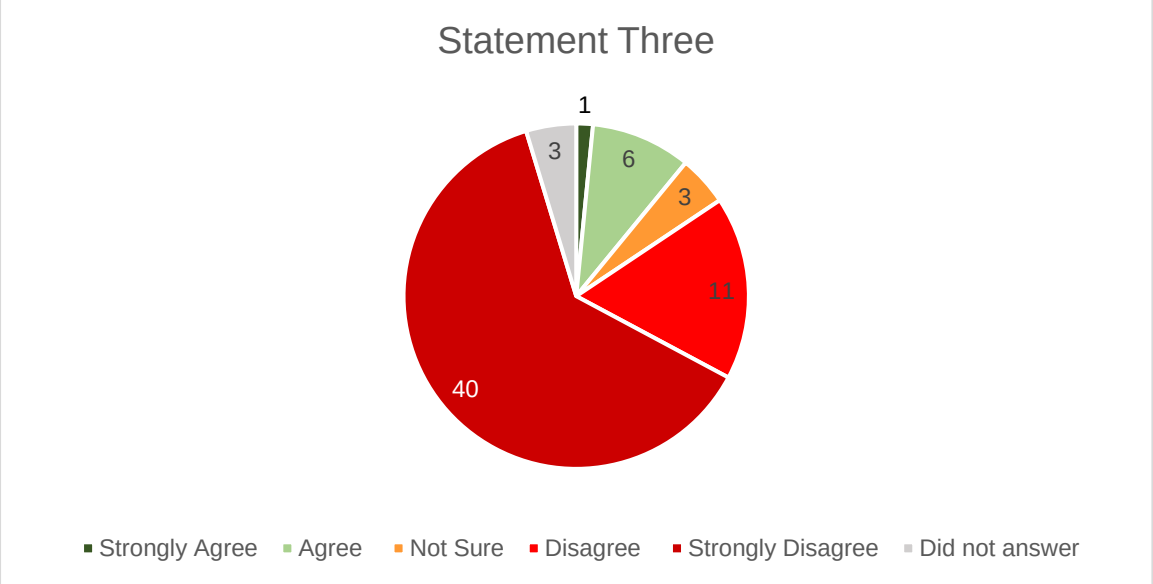
Statement one was answered by 60 respondents, as four responses were left blank. The results show that 69.9% of the respondents stated that they strongly disagreed or disagreed that the current proposals are an improvement on the initial scheme consulted on in 2022. A further 26.6% of respondents answered that they were 'not sure and 3.3% said that they agreed. No respondents selected strongly agree.

Statement Two: The plans will help to address the housing shortage in Wrexham by delivering high-quality homes.



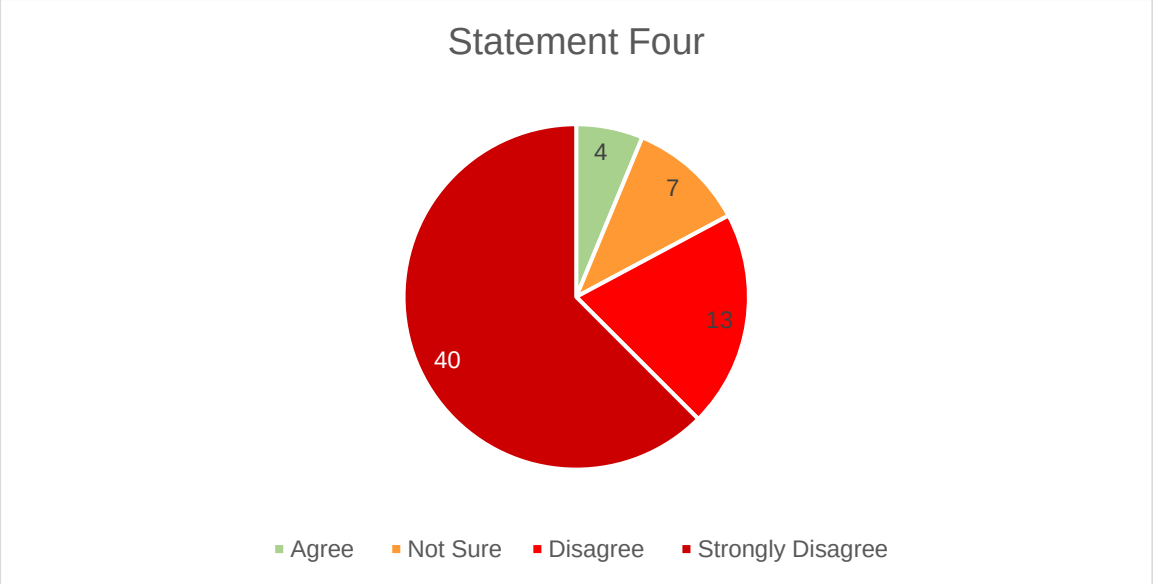
Statement two was answered by 62 respondents, as two people either selected N/A or did not answer. Of the 62, 79% stated that they strongly disagreed or disagreed with the statement. A further 11.2% answered that they were not sure, and 9.6% agreed. Again, no respondents suggested that they strongly agreed.

Statement Three: The benefits of the scheme, such as the primary school provision and sports pitches, will improve the local community.



With three respondents selecting N/A or leaving the box blank, 61 respondents answered statement three. Of these, 83.6% stated that they strongly disagreed or disagreed, 4.9% were not sure, and 11.4% agreed or strongly agreed.

Statement Four: Overall, I like the design of the new neighbourhood included within the proposals.



All 64 respondents answered question four. Of these, 82.8% said that they strongly disagreed or disagreed, 10.9% were not sure, and 6.2% agreed.

Question 5: Do you have any further comments about the proposals? This could relate to the design of the scheme, or how you think we can support the local communities around Wrexham.

Question five asked respondents if they had any further comments, for example in relation to the design off the scheme or how the development could support local communities around Wrexham. This was a free text question, with respondents able to enter their thoughts into a comments box which were then coded to analyse the most frequently occurring themes. Respondents tended to offer multiple ideas or comments, which accounts for the number of answers exceeding the total number of respondents.

Below is a chart demonstrating the topics and the quantity with which they appeared.

Topic	Frequency
Local infrastructure (education, healthcare, shops)	47
Local infrastructure (traffic and roads)	23
Loss of green space	21
Affordability	14
Layout, design and access	9
Environment and wildlife	7
Flooding/drainage	3

Examples of comments relating to each topic can be found below. For the purposes of this section, some topics have been combined. For example, the 'impact on local infrastructure' section includes comments relating to both those on education and healthcare infrastructure, as well as road infrastructure. The same can be seen within the 'impact on local wildlife, pollution and impact on health, and flooding and drainage sections.'

This is because the responses relating to these topics tended to span over various areas, and the comments are best understood in their entirety. Please be assured that comments relating to each category have been quantified according to their category, as seen in the table above, and the linking up of sections below. has been done purely to avoid having to repeat the same comments in different tables.

Impact on local infrastructure

Of the responses, 47 referred to the impact on, or lack of, local infrastructure, such as GP and hospital places, dentists and school places. Some responses also referred to the provision for a new school mentioned within the proposals, suggesting that providing space for one does not mean that one will be built.

A further 23 responses referred specifically to traffic and the impact on local roads, however for the purposes of this section, these comments have been included within the same table to avoid repetition.

Verbatim Comment	Address
"Please can we have a higher percentage of affordable homes AND consideration of space for a high school as this is more important as we have plenty of secondary schools."	LL12 7TE
"The obvious issues is the provision of primary healthcare and how the Trust can cover people in this area. Education appears to be covered but what about the GP facilities and additional traffic in the area."	LL12 8JE

"*Average households have four residents and 2 to 3 cars so I do not object to the development per set but do the maths you need better road structure near and close to the development then you have hundreds of people seeking NHS services GPS dentists etc build homes and build infrastructure to support the residents joined up cooperative thinking and planning before you build would relieve the consequential mayhem."*	LL12 8AD

Loss of green space

Within the responses, 21 referred to the loss of green space. This section incorporated more general comments and objections to using green space for development, but also those which referred to the agricultural and sporting value of the land.

Verbatim Comment	Address
"Far too many homes ! And not enough open green fields !"	LL13 9BS
"The three fields regularly used for activities such as rugby and cross country should be left out of the plans. It gives these children a physical and mental outlook and to take this space away from them does not seem logical. You have already taken away dean roads playing fields so where are these children supposed to go? Furthermore, the traffic on the Cefn Road is horrendous due to lorries and school busses. With your plans to build another new school you are just contributing to more traffic and there will be five schools in a two mile radius. I strongly object to this plan.	LL12 9YT
"There will be a loss of local parkland which is used regularly for sports events and local people wanting a peaceful walk. Loss of wildlife habitat which will impact local community."	LL13 9EB

Layout, design and access

Nine comments made reference to the layout and design of the proposals, with comments relating to desires different types/sizes of homes, homes with larger gardens and homes for disabled and elderly residents. Other comments related to the proposed access.

Verbatim Comment	Address
"Site map doesn't include housing layout but I hope to see large gardens in home to incorporate the current hedge lines and to come away from the traditional new build approach of feeling like you're living in your next door neighbours garden. Obviously certain areas of the development will have to be affordable housing however I hope detached properties come with a substantial garden size creating a bit of privacy for new home owners."	LL13 9GQ
"What about focussing on those downsizing from large homes, to allow others to pit their families in those homes. What I would like is a smaller 3 bed with a bigger than normal 3 bed new build garden!"	CH3 6BD
"Access from the roundabout will be dangerous; this is already approached by vehicles including HGV at speed and people often use the incorrect lanes. There are often crashes on this roundabout and one of the signs is regularly broken being broken. Access to the south does not link to an appropriately sized road; Bryn Estyn Road does not have paths and is used by many pedestrians and cyclists; increase in usage will pose a major risk to active travel users. It will encourage people to use this lane from the Greyhound roundabout, which is already at/over	LL13 9GN

capacity. Access to Thornhurst should be emergency services/active travel only, to protect the residents of this estate from an increase in traffic. The development will encroach into green barrier and is outside the limits of the town."	

Affordability and the need for housing

Within the responses, fourteen referred to the affordability aspect of the development, suggesting that the development does not incorporate enough affordable homes. These comments usually also included those that the homes would not cater to local people, instead to those from further afield. Some residents linked their comments with suggestions that local infrastructure would be saturated, which is why the below statements may seem to also relate to local infrastructure. These statements have also been coded as relating to the lack of local infrastructure, just not included within the example infrastructure.

Verbatim Comment	Address
"I object to the amount of houses, the lack of GP provision, the lack of additional schools, the roads in the surrounding area are not capable to support the additional traffic. There are no provisions for affordable homes for the young people in our area or this on lower incomes. There is no evidence of a feasibility study looking at other land that could be reclaimed for housing. Very disappointed to see the lack of understanding of what our community actually needs. I totally object to this scheme."	LL13 9QD
"Can you point me to the data on 'acute local need'? Housing projections were static at best last time I looked with the only acute need being social housing demand. These houses won't put a dent in that even the small 'affordable' allocation."	LL13 9DU
"How much are the so called affordable homes"	LL14 4JF

Environment and Wildlife

Again, comments relating to the environment and wildlife, and flooding and drainage have been pooled together in the table below to avoid repetition.

Comments relating to the environment and wildlife include both the increase in pollution (including noise pollution) and the subsequent impact on health, and the impact on wildlife, which not only related to the impact on habitats residing onsite, but also included suggestions as to how local wildlife could benefit from the development, such as by incorporating hedgehog holes or swift boxes into the design.

The comments relating to a perceived risk in pollution, included air, noise and light pollution, and the subsequent impact of such pollution on residents' health. Notably, this way this category was coded related specifically to those comments about the impact of pollution on health, and comments relating to the impact of the proposed development on existing residents' mental health due to them opposing the development for various reasons. This was done purposefully, to distinguish these comments from those relating specifically to the impact on healthcare facilities in the area, which have been coded within the 'impact on local infrastructure: healthcare and education' section.

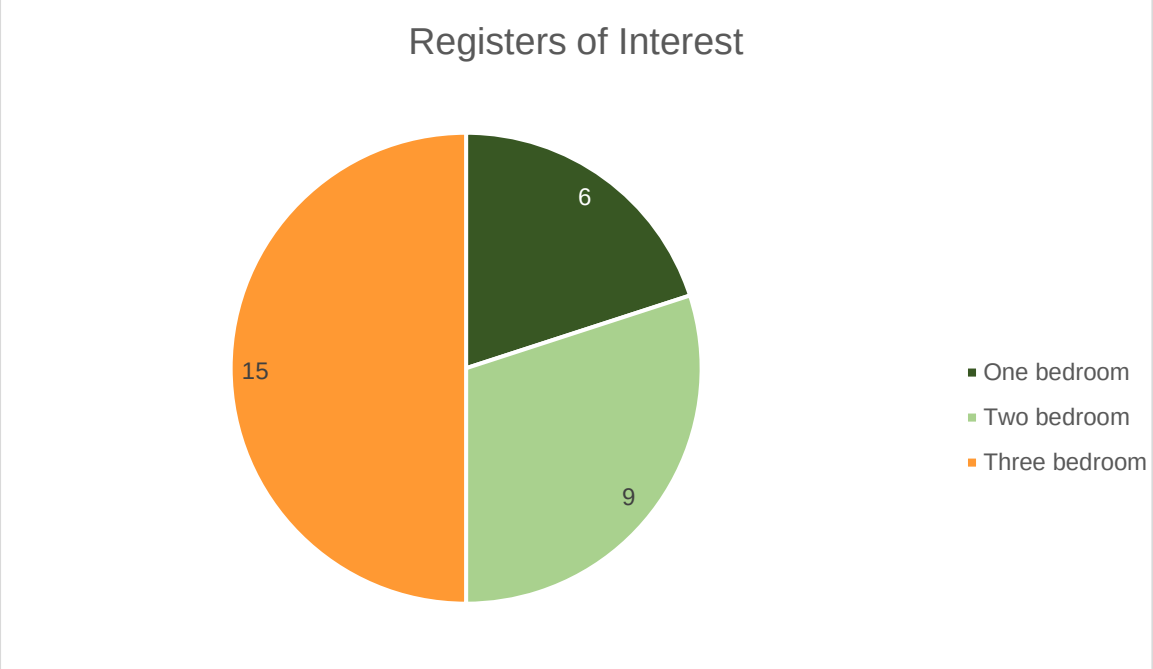
Three further comments related to an increase in flooding and subsequent drainage issues.

Verbatim Comment	Address
"I live along the Cefn road and this development on such a huge scale concerns me. Cefn road is chaotic in the mornings and evenings with the schools work rush, The hedge along Cefn road is full of birds nesting every year, i litter pick this hedge regularly, there are many woodpeckers and green woodpeckers in the trees surrounding these fields so any trees lost at all is completely detrimental to our wildlife. There is also a very mature Badger Sett that has been right next to this area for decades. The building works would have a huge negative impact on this and all the masses of wildlife living here. I think all houses should have some kind of benefit for the wildlife in our area whether it be hedgehog holes or swift boxes etc. This is a huge loss of green space for all of us and will have a huge impact on people mental wellbeing as currently it is such a lovely walking area. Not to mention that Wrexham's hospital is absolutely crippled as are the doctors surgeries and dentists aren't taking on new patients. There are 1000s of homes going up in Wrexham already before this development, i don't agree such numbers are needed."	LL13 0QL
"This scheme will destroy local green land and the wildlife within it. It will negatively impact the health and wellbeing of local residents and put extra strain on the community resources."	LL13 9GB
"A proposed school does not mean a school; the local barn owl population will suffer terribly also".	LL13 9GZ

5.5 Registrations of Interest

The ability for a member of the public to register their interest in a new home at Cefn Park was possible from the launch of the consultation and will remain open until the determination of the planning application. At the time of writing, there have been 24 registrations of interest in a property within the proposed development.

These registrations did not include further comments on the plans but did ask the respondent to indicate their preferred type of home. The options included one, two and three-bedroom homes, and asked respondents whether they would like to be kept updated. The pie chart below provides a percentage breakdown, indicating which options were the most popular:



5.6 Review of Comments Overall

Below is a top-line thematic breakdown of all the comments received from emails, phone calls and responses via the website and register of interest and the frequency with which they appeared.

Topic	Frequency
Local infrastructure (education, healthcare, shops)	51
Local infrastructure (traffic and roads)	26
Loss of green space	22
Affordability	15
Layout, design and access	14
Environment and wildlife	11
Flooding/drainage	3

Below are samples of some of the supportive comments and suggestions received:

Comment	Feedback Type
"I would reduce the amount of recreational ground in favour of replacing a small portion with a doctor's surgery and a few small, local shops, which would also create a number of employment opportunities. If not already done, I would consider the application of 5G and fibre optic internet cabling, to save digging up the grounds when laid."	Website
"Please can we have a higher percentage of affordable homes AND consideration of space for a high school as this is more important as we have plenty of secondary schools."	Website
After reading your Public Consultation Leaflet I have a couple of suggestions. *1. There should be at least 200 affordable homes.* *2. There is no mention of a new Doctors Surgery on the development, if this is not possible then an increase in the number of doctors at the Borras surgery to accommodate the increase in the people moving to this area. I think this should be included in these Plans.* *I agree with the Plan and the new houses which should enhance Wrexham."*	Email
"The dwellings located along Bryan Estonian road should be two storey only. As the fairways estate. A minimum of 21m will be required from our main window to any dwelling opposite. *My other comment is that there are protected TPO trees and therefore there Arboricultural impact assessment will be required."*	Email
What about focussing on those downsizing from large homes, to allow others to pit their families in those homes. What I would like is a smaller 3 bed with a bigger than normal 3 bed new build garden!	Website

Below are samples of some of the objections, suggestions and additional comments received:

Comment	Feedback Type
"I object your proposal; the surrounding area cannot cope with this amount of new homes. Please rethink the number and location of the proposal."	Email
I Live at 60 Cefn Road, I strongly disagree with house's being built right opposite my home on the existing rugby pitch that is used on a regular basis. I strongly disagree with houses being built opposite 44 Cefn Road to 60 Cefn Road. I strongly disagree with the access Road opposite my home, the access Road should be linked to Thornleigh, Oakhurst.	Website
"Firstly touching on the neighbouring estate known as the Fairways Estate, I have to make comment on your assertion that there is "existing play space" on the Fairways Estate north of the proposed development site. As a resident of the Fairways and one of remove reference to this play space as being available for your residents. Use of these areas is only permitted to those who pay an annual service charge for such use. You must ensure that all incidental play and amenity facilities intended for use by your new estate are provided solely from within your own development. I suggest you show in your plans the locations for formal and informal play areas entirely within your own development curtilage.	Email
"1. ASHP's for all new builds. No more gas 2. Solar for all new builds. 3 demand zero pavement parking keeping access clear for pedestrians 4 no new housing without active travel corridors. Improved bike lanes from here to town and industrial estate will be game changers. *Without these 4 issues above you will be adding housing problems rather than solving them"*	Email
With all these new houses being built, there will be a negative impact on services such as doctors because they are stretched for current.	Website
Wrexham does not need more housing. There are plenty of empty houses and also houses on the open market that people can purchase. This project will be taking valuable green space.	Website
We do not need 900 houses here. I live on Cefn Road and if these houses are built there will be next to no green land left. There are enough houses on this road and it's busy enough with traffic as it is. We do not need more disturbance/disruption and this will not improve the community. There are already sports pitches that are well maintained including rugby and football pitches, the traffic here if 900 houses were built would be horrendous.	Website

6.0 Response to Feedback

The Applicant is grateful to all those who have taken the time to engage with the plans for land at Cefn Park. This section of the report outlines the response of the Applicant to the feedback received.

6.1 Impact on Local Infrastructure (Education and Healthcare)

The most frequently raised concern during the public consultation related to issues regarding the ability of local services, particularly medical infrastructure, in relation to the homes proposed. Questions were asked on how nearby doctors' facilities would deal with an increase in the number of people residing in the area and suggestions made that the proposals would place additional pressure on local amenities.

The Applicant recognises that this development may provide additional expectations on local services, including medical services, and as such will be contributing Section 106 payments that can be utilised for a wide range of improvements around the site and across the Borough. It is ultimately the decision of Wrexham County Borough Council how this funding is allocated.

We are aware that provision of primary healthcare locally is available, and the Applicant will remain open to dialogue with the Betsi Cadwaladr University Health Board about provision. Essentially, concerns about healthcare infrastructure from residents and political/community representatives is entirely valid, but with the Healthcare Impact Assessment finding that sufficient healthcare buildings exist, the concerns raised are ultimately about staffing and a perception that the Healthcare Trust is unable to deliver services and a belief that access to a doctor or dentist is inadequate.

Questions were also raised as to the impact on local schools, and the site's provision for a primary school. The plans that were consulted on originally proposed safeguarding land on the site for a new primary school, as well as a financial contribution towards its development.

However, following further feedback and discussion with officers, the message from the Council is that there is a preference to site a new school upon Council-owned land at Bryn Estyn and not upon the Applicant's site as offered. As a result the land that was identified for a new primary school will instead provide space for a new sports playing pitch. This will be constructed as a fully drained sports pitch and will be re-orientated to north-south as per best practice to support the Rugby Club and wider sporting activities across Wrexham.

The Applicant recognises the desired need for a primary school (despite questioning the quantitative demand that their Education Impact Assessment has revealed) and has agreed with Wrexham County Borough Council that it will accommodate a new primary school on its Bryn Estyn site and that any funding contributions from KSS2 developers would be made available through a Section 106 legal agreement.

6.2 Impact on Road Infrastructure (Traffic and Congestion)

Several concerns were raised during the public consultation regarding the increase in traffic as a result of additional residents in the area and the ability of the existing highway network to accommodate more vehicles.

The current plans for Cefn Park have been thoroughly assessed through a Transport Assessment. The study found that there is capacity in the surrounding highway network to accommodate the expected increase in traffic generated by the development.

The Applicant, alongside its highway consultants, is committed to working closely with the Highway Officers to ensure that any impact on the highway network is acceptable, now and in the future.

A CTMP (Construction Traffic Management Plan) and/or CEMP (Construction Environmental Management Plan) will be conditioned and brought forward as part of any Reserved Matters applications so as to address issues such as noise, air quality, traffic, construction hours, construction compounds, etc.

6.3 Loss of Green Space

A number of responses cited their concerns as to the loss of green space to make way for the development.

Whilst building on brownfield land first is desirable, this site has been identified by Wrexham County Borough Council's Local Development Plan as suitable to deliver much-needed new homes as part of the wider Cefn Road (KSS2) allocation. This is due to its sustainable location for the growth of Wrexham's population, close to local amenities and infrastructure and the total lack of any brownfield housing land supply in the County Borough to accommodate any meaningful level of growth.

A Planning Statement was prepared which demonstrates the need for residential development at Cefn Park, as well as how Harworth Group's plans accord with relevant national, regional and local planning policies, which was available on the consultation website and has been submitted alongside this application.

The Applicant recognises the sensitivity of developing on previously greenfield land, and we believe that our proposal includes substantial green infrastructure and corridors to ensure that the development can still provide the benefits of green space and will indeed enhance public accessibility for existing residents.

6.4 Impact on Wildlife

Several comments were made as to the impact on local wildlife on site. A key aspect of preparing the plans for Cefn Park was to assess existing species and habitats. An Ecological Survey has been undertaken and will be submitted alongside the planning application.

In preparing the plans, Harworth Group has ensured that the green infrastructure strategy has been designed to maintain the connectivity of habitats by retaining existing features, such as hedgerows, as well as creating and strengthening connections to existing ponds and woodlands. This will also help to mitigate the impact on habitats which may be on site and indeed deliver Biodiversity Net Benefit.

6.5 Layout, Design and Access

A number of comments related to the design, layout and access. It is Harworth Group's ambition to deliver a development which benefits the local community in the best way possible.

Extensive technical work has been undertaken to inform the urban design principles and planning parameters for the development to establish a clear framework for detailed design moving forward.

This includes delivering three vehicle access points to the development to eastern traffic movements to / from the development off Cefn Road, a safeguarded alignment for a future spine road that will connect this site northwards over Bryn Estyn Road into the KSS2 northern parcel, and the careful consideration of the phasing of the development to ensure the scheme can be delivered with minimal impact to the local community, with a view to protecting the Victorian Walled Garden, provide access to the Council's own landholding at Bryn Estyn and make a relief route link onto the A534 at Llan-y-Pwll.

The development proposes multiple walking and cycling access points and new routes, which will connect into the existing network and Rights of Way across the site, ensuring that existing and future residents can enjoy the expansive open space that is being retained and delivered at Cefn Park; thus delivering active travel measures.

6.6 Affordability

The Applicant is aware of concerns over the affordability of the dwellings and is therefore bringing forward a policy-compliant number of affordable homes (20% of any total) so that up to 180 affordable homes will be provided on site.

This is in line with the Wrexham County Borough Council affordable housing ambitions that have been subject of independent viability testing. The exact tenures of the affordable housing to be delivered will be agreed as part of any s106 Affordable Housing Scheme that will involve securing a suitable Housing Association Registered Provider in delivering affordable tenure for local people.

6.7 Pollution and Health

A number of residents cited concerns relating to pollution, including that of noise and light impacts, and any related impacts on health.

Cefn Park will be a highly sustainable development which capitalises on the site's close proximity to a range of local facilities, such as shops, services and schools. In addition to encouraging the use of public transportation, cycling and walking, a Sustainability Statement has been prepared that focuses on energy improvements, reduced water use, waste management and efficient use of non-renewable material resources, as well as the preservation and increase of ecology and biodiversity assets.

The Applicant has undertaken a series of assessments to ensure that the development does not contribute to an increase in pollution and a subsequent impact on the health of new and existing residents. These include an Air Quality Report and a Noise Assessment.

Whilst the Air Quality Report found that the construction of the development could harm air quality, the Applicant is committed to ensuring that considerate construction measures are adopted to mitigate this risk.

The Noise Assessment also found that noise levels can be mitigated through effective mitigation, and as such noise is not considered a constraint to the residential development at the site.

These mitigation measures can be provided once further technical design works have been carried out, through a planning condition.

Some respondents also suggested that the development would have an impact on the mental health of existing residents due to the development taking away green space. Extensive consideration has been given to ensure that the landscape strategy identified, retains and protects valued features, elements and attributes of the site, where possible. This will involve retaining and enhancing trees and hedgerow through providing open space and green linkages.

The amount of Public Open Space significantly exceeds standards, providing a community orchard and/or allotments, formal and informal leisure and recreational play spaces, and as such we believe that Cefn Park will provide spaces where new and existing residents alike can come together in a development which supports mental health and wellbeing.

6.8 Flood Risk and Drainage

A number of respondents provided feedback relating to flooding and drainage on site, as well as the impact on the surrounding areas.

The Applicant has prepared a Flood Consequence Assessment and Drainage Strategy, which found that the site is located within Flood Zone 1, which is the lowest level of risk. There are several existing ponds on the site which have been incorporated into the Drainage Strategy, which will also provide habitats to maintain biodiversity at the site.

The Drainage Strategy proposes that surface water is collected via rainwater pipes, porous paving, channels and gullies which are drained into infiltration basins. The layout proposes several landscaped areas, allowing the development to be divided into three catchment areas, each being served by an infiltration basin to ensure site drainage.

7.0 Summary of Statutory Consultee Responses

Responses were also received from several statutory consultees, of which summaries have been included in the table below. Full copies of the statutory responses to the consultation have been included in Appendix ces.

7.1 Acton Community Council

Response issued via email on 3rd May 2024

Summary

Acton Community Council reiterated its original objection to the scheme, noting its points in response to the draft Local Development Plan to avoid building on green field sites. The response goes onto the following key areas for concerns and consideration:

- Highways concerns related to Bryn Estyn Road and it not being able to cope with the additional traffic generated by the new development
- Request for no direct access on to the Fairways Estate via Thornhurst Drive
- Request that the spine road be completely built before any housing construction commences to avoid a disconnected approach to delivery and minimising pressure of the Cefn Road / Holt Road roundabout
- The overcapacity in Acton and surrounding areas of local infrastructure, noting the developer should contribute to a new school and provide funding to local GP surgeries.
- The recommendation for green corridors and green spaces incorporated throughout the scheme, and maintaining existing hedgerows.

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking councillors for their response. There will be no vehicular access from Thornhurst Drive and the PRoW will remain. The spine road cannot be built until a phased amount of housing is delivered as there is not only capacity for a quantum of housing on the existing network prior to a figure triggers a need for off-site improvements and spine road connection, but building a road at huge cost without any development funding is unviable.

The healthcare concern is not about buildings but staffing and there is sufficient health and educational provision; yet if a new school is funded this may impact existing provision – but that is a choice for the local Council to determine. The layout incorporates green infrastructure throughout.

7.2 Caia Community Council

Response issued via email on 9th May 2024

Summary

Caia Community Council noted that the scheme had been discussed at the last full Council meeting and shared the feedback. The response did not specifically state an objection to the scheme, and instead raised the following concerns to be considered and addressed as part of the application:

- Loss of amenity
- Effect on infrastructure and services including health and education

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking councillors for their response. The Applicant also requested greater clarity around what amenity is felt to be lost, as well as the perceived impact on local services, to better inform the development. No response was received from Caia Community Council. Health and education comments raised can be responded as per the response to Acton CC.

7.3 The Coal Authority

Response issued via email on 12th April 2024

Summary

The Coal Authority Planning Team confirmed that the site falls within the Coal Authority's defined Development Low Risk Area and thus had no specific comments to make. The team did draw attention to the Coal Authority's Standing Advice note, where relevant for the Applicant.

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking the team for its response. No further action required.

7.4 Sport Wales

Response issued via email on 7th May 2024

Summary

Sport Wales requested for further detail regarding the delivery of Public Open Space (POS) as part of the scheme and around the impact on the existing sports pitches and the mitigation. Information was requested on:

- How the 0.8ha that was being brought back into use would be done, and the timing and budget associated with it
- How the proposed POS exceeds current standards, and which standards are being used
- What the ancillary accommodation would be on
- If there will be a loss of pitches during the various phases and if so how this loss will be mitigated

Response from Applicant

The Applicant met with Sports Wales to discuss the items raised. Since then, the Applicant has decided to alter its approach and provide like for like replacement which results in no net loss but delivers improvements and betterment on the site.

7.5 Welsh Government – Highways

Response issued via email on 23rd April 2024

Summary

The Welsh Government Transport Division, which is contracted out to consultants WSP, confirmed it had reviewed the information and that the Welsh Government do not wish to comment further on the scheme.

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking the team for its response. No further action required.

7.6 Cadw (Heritage in Wales)

Response issued via email on 18th April 2024

Summary

Cadw confirmed it has considered the information provided, that the proposed development will have no impact on the settings of the local (within 3km) designated historic assets, and as such, had no objection to the proposed development.

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking the team for its response. No further action required.

7.7 Cyfoeth Naturiol Cymru / Natural Resources Wales

Response issued via email on 2nd May 2024

Summary

The Development Planning team raised concerns with the application due to insufficient information being provided, particularly regarding protected species (Great Crested Newts and bats), ornithology, and protected sites / foul drainage. The team confirmed that if this information is not provided, they may object to the planning application when formally consulted by the Planning Authority.

The response also requested that the Planning Authority place conditions regarding protected species and a Construction Environmental Management Plan (CEMP) on any permissions granted.

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking the team for its response. A CTMP/CEMP will be conditioned as part of any approval.

Ecological data is continuously being collated and the reduction is site area will lead to lesser impacts as will the changes made to the illustrative masterplan.

7.8 Wrexham County Borough Council - SuDS Approving Body (SAB)

Response issued via email on 1st May 2024

Summary

The SAB reminded the Applicant that in order for construction to begin, SAB approval from the Lead Local Flood Authority must be obtained in addition to planning permission, if granted. It also reminded the Applicant of the guidance documents that should be used during the development design process.

Regarding the Drainage Strategy, the SAB notes that roadside swales and rain gardens are critical to the SAB approval decision, and one primary SuDS feature will not be accepted. They also provided further advice that open management trains would be preferred.

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking the team for its response. Following the SAB response the drainage design has been amended to align with their expectations.

Drainage swales or raingardens have been provided to all available grassed roadside verges. Permeable paving is proposed to private roads and drives in addition to the large infiltration basins. This offers multiple levels and types of SuDS features as requested.

Also following the SAB response, the drainage has been designed so that no flooding occurs during the 1 in 100 year storm, plus an allowance for climate change.

7.9 Wrexham County Borough Council – Highways

Response issued via email on 6th May 2024

Summary

Highways provided comprehensive feedback on the proposed development, focusing on the issues that require further clarification as part of any future planning application. The topics of the feedback focused on scoping, modelling, link road & off-site mitigation measures, access arrangements, phasing and active travel, and key design matters.

In the response, the Local Highways Authority (LHA) advised that:

- The approach for vehicle trips and active travel trips are not consistent, however we accept the vehicle trips for private dwelling houses. The use of trips for affordable houses should be removed from the modelling and any additional testing supplied.
- The LHA requests the provision of a LINSIG assessment on the Gresford Interchange and an ARCADY assessment on the Greyhound Roundabout to evaluate the impacts of the development on the junctions.
- All accesses off Cefn Road require radius kerbs of 8m
- A secondary access point is required at the north end of the site. For areas proposed to serve more than 150 homes, two vehicle access points are required.
- Concern remains that the secondary south access will encourage travel from vehicles intending north on Cefn Road to avoid the traffic signals at the main south access point.
- The LHA would request the provision of a continuous footway on the site frontage to Cefn Road.
- Clarification is required over the delivery of the Industrial Estate Roundabout and A5156/A534 Roundabout improvements.

- Concern remains that the late delivery of the link road would undermine the provision of bus services through the site until a late stage, this will also mean the active travel route through the site will not be in place until a late stage and will result in all the construction traffic being required to travel on the existing strategic road network.

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking the team for its response.

A detailed highway response document was prepared by SLR in response to all comments received (dated July 2024). The Transport Assessment (TA) (including drawings) and Travel Plan (TP) have also been updated to reflect the comments received (updated documents dated January 2025).

While some comments were addressed with additional supporting evidence or clarification, several amendments were made in response to the feedback, with the transport supporting documents updated accordingly.

These updates include:

- Increased junction kerb radii to 8m where previously less, and adding additional tactile paving at the southern primary access.
- Visibility splays on all drawings updated to show 43m.
- Reduced the quantum of development in the northern parcel to 148 dwellings, allowing the retention of a single access point.
- Proposed measures to minimise rat running between the southern secondary access and the main internal spine road.
- Provided more information on the PRoW diversion.

7.10 Wrexham County Borough Council – Rights of Way

Response issued via email on 3rd May 2024

Summary

The Council's Definitive Map Officer provided comments regarding the proposed development, noting that any future scheme would affect several Public Rights of Way (PRoWs) both directly and indirectly. Two points of note were raised specifically about the scheme design and layout alongside recommendations:

- **Abenbury footpath 20**: this would be directly affected by one of the proposed residential parcels and if the layout was to remain, the route would need to be diverted under section 257 of the Town and Country Planning Act, subject to agreement with Wrexham Council's rights of way section. The officer provided a recommendation for the diverted route.
- **Abenbury footpath 1 and Abenbury footpath 3**: these have a rural character and should be maintained, avoiding any tarmacking or high fence boundaries, as well as searching for opportunities to retain the views to the south-east when walking in an easterly direction along footpath 3. The officer provided a potential layout amendment that would allow for the views to the south-east to be maintained.

The officer also raised a point of note on the highways plans, stating that where PRoWs are crossed by internal roads, pedestrian priority should be maintained.

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking the team for its response. The masterplan has addressed these points and the masterplan has accommodated the comments.

7.11 Clwyd-Powys Archaeology

Response issued via emails on 9th, 10th and 14th April 2024

Summary

Clwyd-Powys Archaeology confirmed its involvement on the site since 2020, with evaluation works ongoing and trench plans in place to deliver an evaluation report; noting that trenching appears to avoid all the playing fields, tree roots and that that it can pick up any anomalies noted in the geophysical survey.

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking the team for its response. Evaluation and any trenching is ongoing.

7.12 Welsh Government - Land Quality Advice Service (LQAS)

Response issued via email on 5th April 2024

Summary

The Department for Climate Change & Rural Affairs provided a response to the scheme and the proposed use of Best and Most Versatile (BMV) Agricultural Land. The team raised concerns on the additional 5.9ha of BMW land included within the scheme, that sits outside of the KSS2 and that the justification is not supported by evidence.

The team has noted the removal of the unallocated BMV area from the red line would satisfy the Department's concerns. It goes on to state that if the unallocated area remains within the proposed development, then a specific BMV policy case needs to be made.

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and noted that the land beyond the allocation has been included as the Applicant believes there is an overriding need for development which would facilitate this land being included, as per PPW12 Para 3.59. But moreover, the red line has been reduced to remove the 5.9 ha of BMV land.

Following additional extensive work, as part of the submitted application the red line boundary has been revised to ensure the provision for SuDs is now within the application area which removes the need for further BMV land to be taken.

7.13 Wrexham County Borough Council – Housing

Response issued via email on 3rd May 2024

Summary

The Accommodation Project Manager from the Council responded to the pre-planning consultation, providing comments on the following aspects of the proposed scheme:

- Policy requirement for 20% of the homes be designated affordable (180 of the proposed 900)
- The proposed homes would help meet the need for affordable housing as found in the Local Housing Market Assessment (LHMA) and social housing waiting list
- The affordable housing should be built to a high standard and indistinguishable from the market housing
- Early engagement with the Council's affordable housing team to discuss need, tenure and unit type.

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking the team for its response. No further action required.

7.14 Wrexham County Borough Council – Environmental Health

Response issued via email on 2nd May 2024

Summary

The Enforcement Officer from the Council responded to the pre-planning consultation, providing comments on the Acoustic Report and Air Quality Report, as well as providing other considerations. A summary of the points raised include:

- Conditions must be imposed to ensure an adequate level of protection over the impact of noise to limit the sound pressure levels
- The impact the rugby club and its licencing hours may have on potential noise sources and the suitable mitigation
- The potential wastewater treatment plan and the impact it may have on potential noise sources and the suitable mitigation
- The potential primary school and the impact it may have on potential noise sources and the suitable mitigation
- Recommendation for construction hours noise conditions on any planning permission and for LPA involvement in any future piling activities as part of the construction
- The acceptance of the road traffic sources
- Recommendation for dust management scheme for construction dust to be conditioned on any planning permission granted

Other considerations provided referred to the provision of a primary school on the site and the conditions that would be recommended alongside that inclusion.

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking the team for its response. CTMP / CEMP can be conditioned to address concerns, all other points noted and accepted.

7.15 Welsh Water

Response issued via email on 15th April 2024

Summary

Developer Services for Welsh Water provided a response to the pre-planning consultation, providing comments about the proposed development and how the Local Development Plan consultation process ensured assessments were undertake of the public sewerage and watermains systems, and informed the response issued. Key considerations raised as part the response included:

- The recommendation to amend the layout of the scheme to ensure access is protected to the existing sewerage network across the site
- The recommendation for the Applicant to carry out surveys to ascertain the location of the sewers and its relationship with the proposed development
- The existing foul water network does not have capacity to accommodate the development and in the absence of any solution, Welsh Water would not be able to support the development, However the response highlighted the ongoing work on the Hydraulic Modelling Assessment (HMA) to help identify such solutions.
- The potential need to apply for a connection to the public sewer under Section 106 of the Water Industry Act 1991.
- Recommendation that the Applicant consult with Wrexham Council as the determining SuDS Approval Body (SAB) to ensure approval of sustainable drainage systems as required by law.

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking the team for its response.

Hydraulic Assessment completed by Welsh Water concluded that additional attenuation is required to their network to facilitate new foul connections to the public sewer. It should be noted that the hydraulic modelling completed by Welsh Water was on the assumption of 1,100 units being constructed and connected to the network.

The assessment has provided a recommendation on the volume required which has been prorated down to allow for a 900-unit development and incorporated into the latest design solution.

7.16 Wrexham County Borough Council – Active Travel

Response issued via comments on the documentation throughout May and June 2024

Summary

Highways officers at the local authority provided detailed commentary on the Transport Assessment, illustrative masterplan, and the Framework Travel Plan regarding the provision and support for active travel. The response was in-depth and wide ranging, and can be summarised as follows:

- Noted missed opportunities for better walking and cycling provision, ensuring they are well-connected across the development, avoiding dead ends, providing safe crossing points and better links to the proposed road network and to the proposed leisure amenities.

- Further detailed required on how sustainable travel measures could be implemented during the sales phase and a suggestion for developer funding for future training and courses to encourage bike riding.
- Suggested locations for improvements to the local network, including the potential for cycling infrastructure along Cefn Road; the existing provision at the Greyhound Roundabout not up to standard and in need of improvement; the lack of pedestrian and cycle facilities at the A534 Holt Road and A5156 Roundabout; the opportunity for Bryn Estyn Road to be re-surfaced.
- Noting the updated Active Travel guidance and regional transport plans coming into effect that must be considered.
- Concerns as the location of the proposed primary school within the development, future travel patterns from pupils and impact on trips generated because of it.
- Need for segregated cycle facilities, from both pedestrians and vehicles, if space allows
- Need for the proposed crossing on Cefn Road to allow for cycles as well as pedestrians
- Public realm improvements including seating opportunities
- Alignment between Active Travel requirements and other statutory consultees, such as ecology and Rights of Way

Response from Applicant

The Applicant responded to the email, acknowledging the comments made and thanking the team for its response.

Many of the comments received related to internal matters that will be addressed at subsequent stages (detailed design stage) once outline planning permission has been secured.

Additionally, a number of the comments made by the Active Travel team were general statements rather than actionable feedback. These were acknowledged and noted as part of the review process.

A detailed response was prepared by SLR (dated August 2024), with this document providing an itemised response to each comment received. This document has been attached as an appendix to an updated Transport Assessment and Travel Plan (dated January 2025).

8.0 Post Consultation Engagement

Following the consultation period, a significant amount of technical work has been undertaken in order to address the comments raised by statutory and specialist consultees, as well as concerns raised by the local residents.

The Applicant would like to thank all of those involved in sharing their feedback and advancing the scheme into what is being submitted.

As a result of this work, there have been significant changes to the scheme submitted to Wrexham County Borough Council than that which was consulted on.

The changes of note include:

- *The amendment to the red line boundary and application area, to ensure that the whole development sits within the Local Development Plan boundary.*
- *The inclusion of the proposed SuDS water attenuation features within the allocation red line boundary, removing the need for additional BMW agricultural land.*
- *The agreement with the Council that the proposed safeguarded land for a school would no longer be required, as the new Primary school would be accommodated on its Bryn Estyn site.*
- *The avoidance of any sports playing field loss and need for increased betterment and instead the loss of the existing sports pitch in the north-west corner that is required due to accommodate access, would be replaced on the land previously allocated for the school. this would be a fully drained sports pitch and delivered in line with best practice – therefore like for like compensation and mitigation, but with enhanced betterment being offered.*
- *Removing a 4th highway access off Cefn Road that will remove any playing field loss.*
- *A series of Highway adjustments in response to Highway comments.*
- *Masterplan layout adjustments to take on board and address PROW and other design related comments.*

Other principles of the development, such as the delivery of up to 900 homes, the access points and the proposed alignment of the spine road, remain as what was consulted on in spring 2024.

Given these changes and the interest shown by residents and stakeholders, the Applicant will ensure information continually flows through existing channels to interested parties.

The Applicant will offer briefings to local political representatives at community, County Borough and Senedd levels about the results of the pre-application consultation and to talk through the finalised application.

The consultation website, **www.erlasparkconsultation.co.uk** will be updated at the following junctures during the planning process at the following points:

- Upon submission
- During the planning process
- After determination

This will ensure that the wider community is aware of the submission of the planning application. Press releases will be issued to local media outlets.

9.0 Conclusion

The Applicant has undertaken a statutory pre-application public consultation to seek the views of the local community regarding its plans for Cefn Park (land east of Cefn Road) in Wrexham.

The consultation has been undertaken in line with Welsh Government planning policy and the principles of localism. As such, the Applicant has provided ample opportunity for local residents, politicians and stakeholders to find out more about the proposals and to submit their feedback.

The consultation resulted in just 101 responses, despite around 1,374 leaflets being distributed locally. The low response to the consultation suggests that only a small proportion of local residents have determined a position on the proposals at this stage and that most do not have a particular view either for or against the proposals.

The feedback received from local people has been fully reviewed by the development team and used to help inform the final plans.

The Applicant acknowledges the issues raised and the sensitivity of the proposals among the local community, but these concerns raised have been addressed in this document and will be used to guide the proposals submitted to the Council.

The Applicant will continue to maintain dialogue with consultees following the submission of the application given the sensitivities and complexities regarding the plans.

It is clear from this PAC report that the Applicant has followed and consulted in accordance with the statutory DMO regulations and responded positively to all concerns raised by those who have made comments during the DMO process. The Applicant will continue to engage with Wrexham CBC, the Ward Councillors, the Community Councils and other statutory consultees and interested parties during the determination period of the application.

Importantly, there are no fundamental statutory objections to this scheme and whilst there are concerns raised all have been positively addressed and overcome. This demonstrates that the site is suitable, viable, feasible and deliverable.

All further and additional comments received as a result of the statutory planning application consultation process will be considered by the Applicant and we will reserve our right to respond as appropriate and necessary.

Please note that the appendices for this Pre-Application Consultation Report can be found in a separate document that has been submitted alongside the planning application.