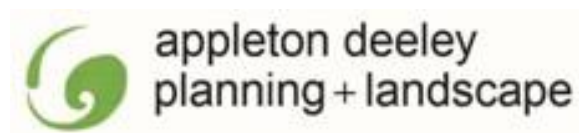


PLANNING STATEMENT

SITE AT GAMFORD HOUSE, GAMFORD LANE, ROSSETT LL12 0EW

REDEVELOPMENT OF SITE WITH 10no. DETACHED CARBON
ZERO DWELLINGS AND ASSOCIATED LANDSCAPING WORKS



June 2023

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**SITE AT GAMFORD HOUSE, GAMFORD LANE, ROSSETT LL12 0EW
REDEVELOPMENT OF SITE WITH 10no. DETACHED CARBON ZERO DWELLINGS AND
ASSOCIATED LANDSCAPING WORKS**

1.0 Introduction

1.1 This supporting Statement considers the planning issues relating to the full application proposals for the demolition of workshops and storage sheds and the erection of ten detached private dwellings, landscaping and all associated works on land at Gamford House, Rossett.

1.2 Previous applications for redevelopment of the site have been assessed against Policy H5 of the Wrexham Unitary Development Plan 1996-2011 (UDP). This application now proposes a residential development on a designated mixed-use and previously developed site. Importantly, the proposals are for a carbon-zero development, with a strong emphasis on placemaking, which will raise the standards of design quality in the Wrexham County Borough.

1.3 A public consultation on the proposals in both October 2022 and July 2023 has confirmed support for redevelopment of the site and that the impacts of the development will be positive in the following aspects:

- The location is sustainable and the proposals will not place a strain on existing infrastructure.
- The development fits with the existing development pattern in this part of the County Borough.
- The proposals would bring less harm to water quality, air quality, soundscape, ecology and less vehicle movements than any of its previous lawful uses.
- Placemaking outcomes are measurable and have informed the design of the proposals.
- The low density of the development will enhance openness in the countryside in comparison to its current impacts.
- Development sustainability is not restricted to the location but includes the carbon zero specification of the buildings and the re-use of a previously developed site.

1.4 This Statement assesses the site and its context by considering the physical, social, economic and planning policy context. It explains how the proposals have embraced the national sustainable placemaking outcomes. The developer is therefore seeking approval to a proposal at a sustainable location that seeks to augment openness of the countryside, provide residential amenity to residents that satisfies the policy requirements of Wrexham County Borough Council, and enhance design quality in the County Borough through a scheme that is demonstrably viable and deliverable.

1.5 The application site provides an opportunity for a sustainable development on brownfield land located on the outskirts of the large village of Rossett. These proposals for 10no. Sustainable Carbon Zero Homes have been formulated on behalf of a local developer, based in Rossett with a track record of delivery of sensitively planned and high quality residential schemes.

1.6 The proposals reflect the sequential approach to the identification of residential sites that seeks opportunities for providing capacity within settlements and further capacity in brownfield sites close to the edge of settlements. Importantly, doubt about the site's land use designation have now been removed through the granting of a Lawful Development Certificate for a Mixed Use on 9th July 2021. Those lawful uses include B2 Light Industry, B8 Warehousing and Distribution, Agricultural and Sui Generis Uses of Haulage Business with HGV Maintenance Depot, whilst land adjacent to the LDC site, but part of the defined planning unit, is residential. Planning Barrister advice on the application of the Burdle principle has confirmed that this is the case. (Application ref. ROS/P/2021/0293).

1.7 The Wrexham Unitary Development Plan has a Chapter on Housing and sets out this sequential approach:

Housing 3.7 The housing element of the strategy reflects the overall approach towards settlement growth set out above. In essence, the aim is to allocate most new housing development to a range of sites within and adjacent to existing built up areas; to make optimum use of previously developed or vacant land; to make use of spare capacity in infrastructure and services; and to focus on locations with reasonable public transport, walking and cycling links.

Further to this, Policy PS3 states; '***Development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land, wherever possible, particularly so where greenfield land is of ecological, landscape or amenity value, or comprises agricultural land of grades 1, 2 or 3a quality.***'

The UDP Policy on Small Scale Neglected Sites, Policy EC15 states; '***Action will be taken to protect and enhance general amenity through the reclamation and restoration of derelict sites, and through the improvement of untidy sites, dilapidated buildings, and other eyesores, particularly those in sensitive locations.***'

1.8 The following reports are included in support of this application and should be read in conjunction with this Planning Statement:

- Phosphates Assessment
- Public Consultation
- Preliminary Flood Risk Assessment
- Sustainable Carbon Zero Homes Report
- Landscape Impact Assessment
- Preliminary Ecological Assessment – including Bat and Great Crested Newt Surveys
- Housing Needs Statement
- Design and Access Statement

2.0 Description of the Site and Surroundings

2.1 The application site is located close to the eastern built-up edge of Rossett and its established residential estates. Rossett is a large village to the north of Wrexham and is home to some 3,500 residents. Gamford House is located on the northern side of Gamford Lane, approximately 0.2 miles east of the village of Rossett. The historic village of Rossett is located approximately 8 kilometres north-east of Wrexham town centre. The village is structured along Station Road and Chester Road (B5445). The A483 (which forms a bypass for the Village) bounds the village and its landscape setting to the immediate west. The village is also bound to the south by the River Alyn.

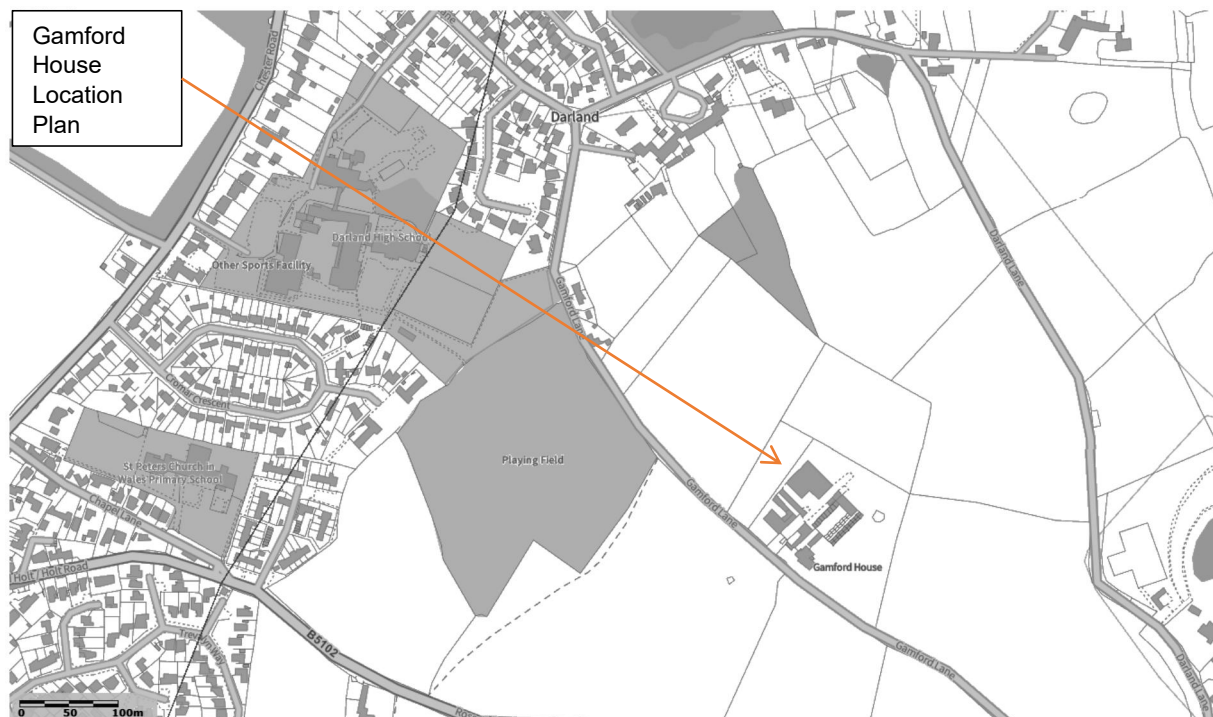
2.2 The site is well located on Gamford Lane, within easy access of Rossett's village centre, with local schools, shops and bus routes all within a reasonable walking and cycling distance.

2.3 The site features a range of vacant, dilapidated farm buildings and a single derelict dwelling house. Gamford Farm was originally a working pig farm, then used for the production and distribution of whey and pig-swill and a workshop depot for commercial vehicle repairs. It has not been in use for approximately 10 years. The few agricultural buildings are not suitable for any other agricultural purpose, having been constructed specifically for pig farming. Their layout and design are not appropriate for modern agricultural requirements and the economies of scale / mechanised handling that is essential for commercially successful modern farming. The proposals cover an area of around 1.36Ha.

2.4 There are two main access points onto the site from Gamford Lane, one wider entrance to the west (accessing the workshops) and one smaller entrance to the east (accessing the dwelling house). The site is level with a slight fall from north to south towards the River Alyn. Perimeter hedgerows run along the eastern perimeter of the site and other hawthorn hedgerows and buildings define all other boundaries. Direct vehicular access is available to the site off Gamford Lane which links Rossett with Holt to the south east and the A534.

2.5 The site is considered to be located in a highly sustainable and accessible position to take advantage of existing community facilities and transportation related infrastructure and the redevelopment of this brownfield site making use of existing buildings is the most sustainable approach to the provision of new housing in the County Borough, particularly in a sustainable location. The site provides an opportunity for nine 5 bedroom detached carbon zero private dwellings and a two bedroom bungalow. These have been designed to blend in with the existing landscape and will remove the blight that this brownfield site is causing in its current condition.

2.6 This 1.36 Hectare parcel of land has a Lawful Development Certificate -Existing Use, granted on 9th July 2021, for Mixed Use of Land and Buildings for Agriculture, B2 General Industry, B8 Storage and Distribution and Sui Generis Uses of Haulage Business with HGV Maintenance Depot, (application ref. ROS/P/2021/0293). The commercial uses on the site ceased operations in July 2016.



A Haulage Company previously operated out of the Gamford House site.

2.5 An accurate definition of the character of the site and its surroundings is essential to establishing the policy framework against which these proposals will be assessed.

2.6 With regard to the Council's evidence base on landscape character, there is an important resource to be consulted. We have undertaken a Landscape Character Assessment of the application site and its immediate context, already examined and validated at the strategic level by The National Landscape Character Areas Assessment of Wales carried out by Natural Resources Wales and, at the local level by the Wrexham LANDMAP SPG, referring to the Dee Terraces Landscape Character Area 13c. The Landscape and Visual Impact

Assessment is included as a supporting document and should be read in conjunction with this Planning Statement.

2.7 The process of landscape character assessment provides for more detailed appraisals to be carried out within a confirmed wider context, with accredited guidance on this procedure being supportive of this method for providing vital information for use in the proper determination of planning applications.

2.8 Our assessment has been prepared following guidelines published jointly by the Institute of Environmental Management and Assessment and the Landscape Institute in 2002 and updated in 2013. These acknowledged sources of guidance were originally produced for use in England and Scotland but have been used in Wales for undertaking their current Landscape Character Assessments. They are therefore relevant reference sources to use in this case. Natural Resources Wales have confirmed these sources are valid for this purpose.

2.9 From evidence already observed on the site and submitted to the Council on previous occasions, our landscape character assessment has examined the site and its immediate context, making reference to elements of landscape character that are referred to in existing recognised assessments. For example, the strategic assessment for Character Area 13c Dee Terraces, prepared by NRW, includes in its list of Key Characteristics a reference to “compact nucleated Hamlets..” as components of landscape character. These features are relevant determinants of landscape character and are found at Darland Lane North, Trevalyn Farm, Trevalyn, Harwood Lane and Gamford Cottages.

2.10 Within them the majority of residential properties are urban in character, in others there are examples of suburban residential character, whilst others are of rural character, with some having been converted into residential accommodation from former farm buildings. These nucleated hamlets are integral elements of local landscape character and therefore are a material consideration in assessing this prospective application, because they are an established part of the character context.

2.11 Buildings on the site are dominated by larger industrial-style steel frame structures with asbestos and tin sheet cladding, once used in the commercial production of whey. All these buildings sit alongside a large residential brick building of distinctly urban character, of no merit, and are extensively fire-damaged and vandalised. Between the buildings are expanses of concrete roads and hardstanding. We contend that these features and the lawful uses designated on the site provide the context for the proposals and clearly have a justified role in supporting appropriate mixed use development on this site.

2.12 We have followed the guidelines published jointly by the Institute of Environmental Management and Assessment and the Landscape Institute in 2002 and updated in 2013, for Landscape Character Assessments and conclude that the proposals do not have a net harmful effect on character.

Planning Policy Wales edition 11 (PPW11) states;

6.3.21 Planning authorities should draw upon LANDMAP in the preparation of landscape plans and assessments needed to inform development plans, SPGs and the development management process.

The guidelines clearly require parcels of land such as the application site to have a specific landscape character assessment.

With regard to the sustainability of the location and the proposals, PPW11 states;

*‘3.1 Effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the formulation of a development plan, or when developing specific proposals. The **policy issues should not be considered in isolation from one another** (my emphasis). This includes considering the design of a development and its impacts upon everyday lives as well as thinking holistically about where people might live and work and which areas should be protected. These crucial, early decisions will have the greatest impact on the type of development which is ultimately delivered and its contribution to sustainable development and the environmental, social, cultural and economic well-being of Wales.’*

3.0 The Planning Status of the Site

3.1 The Chief Officer, Planning and Regulatory, Report to Planning Committee 1st July 2019 Item 4m, makes it clear that previous assessments of the proposals relied on the site being agricultural, as the following extracts illustrate:

‘Notwithstanding the above the existing character of the site is agricultural and it is viewed in the context of a wholly agricultural landscape. The proposed development would bring about a fundamental change to that appearance. A rural agricultural character would be replaced by a development that, when considered as a whole, is effectively a new-build housing development of urban character completely out of keeping with and detracting from the rural surroundings of the site. This represents a clear conflict with policy GDP1(a).’

3.2 However, the site is not agricultural, albeit that it is viewed within an agricultural context. It is a brownfield site, comprising mainly of derelict buildings, industrial in character and the remains of a dwelling of urban character. All these buildings dominate other features on the site, including remnants of former pig sties.

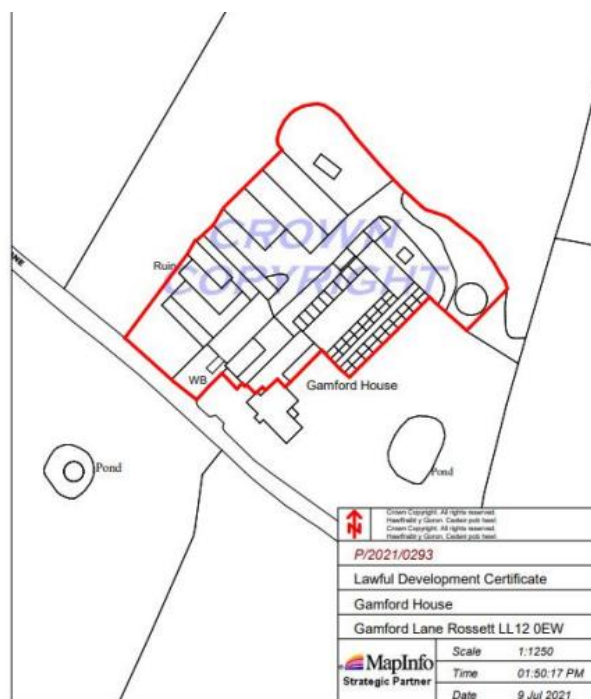
3.3 Further comments on Character were made by the Appeal Planning Inspector, Kay Sheffield, for application P/2021/0293: 36. *‘The planning application cites the existing use of the site as a vacant farm holding, the last use being described as a pig farm. Whilst reference has been made to the site also being used as a workshop depot for commercial vehicle repairs, no substantive evidence has been submitted to confirm that such a use was carried out lawfully in its own right as opposed to being ancillary to the agricultural use of the land.*

*On the evidence before me I consider the land to be agricultural. Whilst PPW defines previously developed land as that which is or was occupied by a permanent structure and associated fixed surface infrastructure, the definition specifically excludes agricultural or forestry buildings. The site therefore **does not fall within the definition of previously developed land and the predilection given to the development of such land in preference to greenfield sites does not apply in this instance.**’*

3.4 However, on 9th July 2021 application P/2021/0293 for a Certificate of Lawfulness of Existing Use or Development was approved. The lawful designation of the site is now; ‘LAWFUL DEVELOPMENT CERTIFICATE - EXISTING USE - MIXED USE COMPRISING OF AGRICULTURAL, CLASS B2,

CLASS B8, HAULAGE OPERATOR'S YARD AND HAULAGE BUSINESS TOGETHER WITH ANCILLARY HGV MAINTENANCE DEPOT (SUI GENERIS)

3.5 The site is industrial in character and meets all the criteria of the statutory definition of 'dereliction'. Planning Policy Wales edition 11 (PPW11) states that previously developed land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome. Accordingly, reliance on Policy H5 is considered unreasonable and the site's lawful use and brownfield designation should be acknowledged.



Site plan issued under consent P.2021/0293 Lawful Development Certificate

4.0 Public Consultation on Proposals

4.1 Pre-application public consultation exercises in September 2022 and May 2023, sought the views of residents and businesses in the locality of the site, on the proposals. The recent consultation period commenced on 2nd May 2023 with a short presentation to the Rossett residents' community group by Appleton Deeley Planning and Landscape. For the initial consultation in September 2022, copies of the consultation questionnaire were left with the Community Agents and a Public Notice placed in the 'Essentials' Magazine which was distributed to every address in Rossett and Gresford. In May 2023 Public Notices (in Welsh and English) were posted at the site and reproduced below, whilst letters were sent to all residents within 300m of the site. On 21st June 2023 the proposals were presented to the Rossett Community Council as part of the Pre Application Consultation. Proposals plans were distributed and discussed with members of the Community Council.

4.2 In September 2022 it was decided that the most efficient and comprehensive way of consulting local residents and businesses on the proposals would be via an online survey. The

link to the survey was publicised in the village, community magazine and on the Rossett Community Facebook page.

4.3 A summary table of responses is provided below. The full and the redacted version of the responses will be made available subject to Data Protection legislation.

Questions	The proposed carbon zero development would make a positive contribution to the landscape	Nine homes should be the limit on this site	The site attracts anti social behaviour	The site should remain undeveloped	The previous lawful uses should be allowed to resume	All new buildings in Wrexham should strive for zero carbon
Responses:						
Agree	12	7	8			10
Slightly agree	1		1		1	2
Neither agree nor disagree		6	1	1	1	
Slightly disagree						
Disagree	1		2	10	11	
Total responses	14	13	14	11	13	12

4.4 Significantly, the majority of respondents agree that the scheme would make a positive contribution to the landscape.

Most respondents do not want the site to remain undeveloped.

Most respondents do not wish to see the previous lawful uses resume on the site.

Most thought that all new developments in Wrexham should strive for zero carbon rating.

Concerns about traffic, fumes and noise were common responses and redevelopment of the site with a predominantly residential mixed use development was favoured. These outcomes were circulated to Community Agents and Members for Rossett.

Following a presentation to Rossett Community Council on 21st June 2023 a letter of support was received and is reproduced below:



PO Box 2421
Wrexham
LL11 0PN

Gamford House Pre-Application.

Dear Mr D Horton,

Rossett Community Council would like to express their support in the project planned for Gamford House pre-application. Many thanks to you for coming to speak to council themselves and explain the project in more details. They are pleased to hear the plans for the area are to include such factors as carbon zero and passive housing. Also, the inclusion of a bungalow was considered a great asset. The Community Council were very disappointed to see the previous application refused for no valid reason.

Kind Regards,

Joni Rusling

Joni Rusling
Clerk of Rossett Community Council

Further publicity of the proposals was through the publication of a notice on the Rossett Community Council Facebook page:

Facebook Notice:



Public Consultation – Gamford House, Gamford Lane LL12 0EW

The views of residents and businesses in Rossett are being sought on the future of the site at Gamford House, Gamford Lane. It is proposed to redevelop the site with 10 carbon zero dwellings of the highest standards of design and quality. Details of the proposals and a Questionnaire can be found in the following link: www.gamfordhouse.co.uk

Your views can be recorded here and posted to info@gamfordhouse.co.uk Your views will be reported to Wrexham CBC and considered in the determination of any planning application for the proposals. The consultation will run until 14th June 2023.



Site Notice:

The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 Schedule 1B, UNDER ARTICLES 2C AND 2D
PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Proposed redevelopment of site at **Gamford House, Gamford Lane LL120EW** with 10 detached carbon zero dwellings and landscaping.

I give notice that Urban Developments Ltd. is intending to apply for planning permission to Wrexham County Borough Council. You may inspect copies of the proposed application, the plans, and other supporting documents online at www.gamfordhouse.co.uk. These may also be viewed online at Gresford and District Community Library, Vicarage Lane, Gresford, Wrexham, LL12 8UW, on Tuesdays 2pm till 5pm, Thursdays 2pm till 5pm and Saturdays 10am till 1pm.

Anyone who wishes to make representations about this proposed development must write to the applicant/agent at Urban Developments Ltd. Pinfold Works, Rossett Road, Wrexham LL12 0DQ or info@urbandevelopments.co.uk by **14th July 2023**.

Signed: **D. Horton** Appleton Deeley Planning and Landscape Date: 28th May 2023



Existing Site of Proposed Redevelopment, Area 1.36 Hectares

Proposed Site Layout – May 2023

 appleton deeley planning + landscape
a partner firm with appletons

5.0 The Proposals

5.1 The planning application is submitted for Full Planning permission for the demolition of existing single and two storey buildings and a development of ten carbon zero private detached dwellings on this brownfield, mixed use site. The scheme proposes to remove the workshops, barns and pens and to erect properties to meet modern standards of residential amenity, reflect local building character and allow important vistas to be established. The linear form of the workshops, sheds and pens will be replaced with interspersed detached properties that afford vistas to the open countryside and permeability. The provision of a curtilage to each of the properties affords opportunities for planting and landscaping to be used to integrate the development into the landscape.

5.2 The dwellings will be sited within a landscaping scheme that is integral to the character of the development and sympathetic to the surrounding landscape. The overall size and scale of the proposed dwellings will be designed to reflect sizes and proportions of existing dwellings within the surrounding rural area. The landscape at this part of Wrexham is characterised by satellite hamlets of single and two storey dwellings. The proposed dwellings, in terms of height and mass, are consistent with the existing dwellings in Rossett. The combination of sympathetic building height, mass and good separation together with good landscaping ensure enhancement rather than harm to the landscape character.



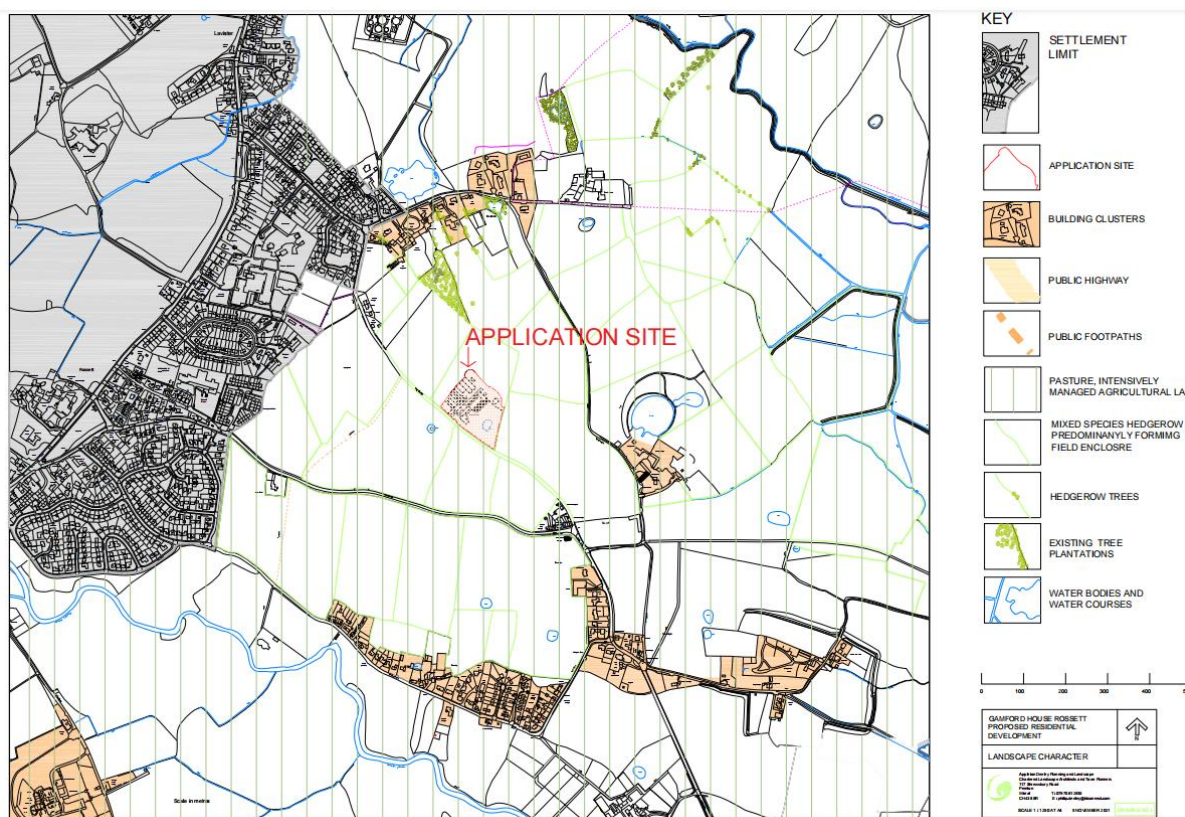
Proposed Site Plan

Development Principles

5.3 PPW11 paragraph 3.60 states that '*Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation*'. This Planning Statement demonstrates both that the site location is sustainable and that the scheme can be accommodated by existing infrastructure and access arrangements, and that the proposals have no harmful impacts upon habitat and landscape conservation.

The proposals represent an opportunity for the redevelopment of a brownfield site to meet the following objectives of the extant UDP and the emerging Wrexham Local Development Plan:

- Redevelopment of brownfield land
- Provision of high quality residential amenity for residents
- Limited infilling in open countryside
- Augmented design standards and building quality in the County Borough
- Protecting and enhancing openness in the countryside
- Meeting a need for high quality executive homes in the County Borough



5.4 Planning Issues

Are the proposals acceptable under Policy H5 – Housing in the Countryside, GDP1 General development principles relating to design, Policy EC1 Green Barrier and Policy EC5 – Special Landscape Areas?

Exceptional circumstances must be demonstrated for new housing in the Green Barrier and Special Landscape Areas.

Will the proposals enhance the character of the Green Barrier and Special Landscape Area?

5.5 Meeting Housing Needs

For housing needs to be met, schemes have to be available, developable and deliverable. Achieving the goal of meeting housing needs depends to a great extent on the willingness of land owners to make sites available.

The applicant is a local developer who has proven track record of delivering high quality residential schemes in the Borough and in the proposals for this scheme strives to deliver similar standards of design and architectural merit to their recent nearby development in Rossett, which may be referred to under application reference P/2015/00221.

The emerging Local Plan requirement is to deliver 7,750 homes which equates to 517 per annum. The actual rate of completions over the period 2013 and 2021 has only been 254 units per annum. This amounts to a significant shortfall of housing land in every one of the last 8 years. In addition to dwellings delivered through existing commitments and proposed brownfield and greenfield housing allocations, the LDP is expected to be delivered by other components including windfall sites. This site presents such an opportunity. The acknowledged housing requirements of the County Borough is therefore also relevant and an important consideration that carries considerable weight.

6.0 Planning History

P/2021/0293 Certificate of Lawfulness of Existing Use or Development – Gamford House, Gamford Lane, Rossett LL12 0EW

LAWFUL DEVELOPMENT CERTIFICATE - EXISTING USE - MIXED USE COMPRISING OF AGRICULTURAL, CLASS B2, CLASS B8, HAULAGE OPERATOR'S YARD AND HAULAGE BUSINESS TOGETHER WITH ANCILLARY HGV MAINTENANCE DEPOT (SUI GENERIS)
Approved 9th July 2021

P/2019/0246 - Gamford House, Gamford Lane, Rossett, Wrexham, LL12 0EW

Change of use, conversion and replacement agricultural barns and farmhouse to form 8. No detached dwelling houses including removal of derelict structures across the site. Refused and Appeal dismissed.

P/2016/0384 Change of Use and Conversion of Barns to Form 8no. Residential Units, Construction of 2no. Semi Detached Dwelling Houses (replacement of existing farm house) and Demolition of Remaining Structures Across the Site. Granted.

CB1060 Redevelopment of the site with 18no. dwellings and associated garages, including conversion of existing buildings and alteration to existing vehicular and pedestrian access.

Refused 16.5.97. Appeal dismissed 19.11.97.

7.0 Planning Policy Context

Future Wales the National Plan 2040

Policy 20 identifies Wrexham and Deeside as a National Growth Area

National Planning Policy: Planning Policy Wales Edition 11 (PPW11)

7.1 Planning Policy Wales (Edition 11) February 2021 at paragraph 1.22 states that:

“Up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making ... Planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise” .

This legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.

Active and Social Placemaking and Well-being are the foundations of National policy. The outcomes that this scheme will bring include:

- Scheme prioritises the use of previously developed land and existing buildings
- Fosters economic activity
- Embraces smart and innovative technology
- Unlocks potential and regenerates
- Accessible by means of active travel and public transport
- Appropriate development densities
- Mix of uses
- High quality and built to last
- Generates its own renewable energy

7.2 Section 38 of the Planning and Compulsory Purchase Act 2004 advises planning authorities that; “Where, in making any determination under the Planning Acts, regard is to be had to the development plan, the determination shall be determined in accordance with the plan, unless material considerations indicate otherwise”. We contend that the scheme meets significant placemaking and well-being objectives and that these are material considerations in the assessment of this application, with significant weight afforded in the planning balance.

Local Planning Policy: Wrexham Unitary Development Plan 1996-2011

7.3 The driver for the development of these proposals is the current policy framework of Planning Policy Wales and the local development framework. The relevant development plan, despite being time expired, is the Wrexham Unitary Development Plan, as adopted by the Council in February 2005. This submission has been informed by the following policies of the Wrexham UDP:

PS1, PS2, PS3 and PS4 - Strategic policies relating to the broad location of new development;

GDP1 – General development principles relating to design;

GDP2 – Capacity and infrastructure contributions;

EC1 – Appropriate development in green barrier designations;

EC2 – Development on agricultural land;

EC4 – Development and hedgerows, trees and woodland;

EC5 – Special Landscape Areas;

EC6- Biodiversity

EC12 -Flood Risk

EC13 – Surface Water run-off;

EC15 - Small Scale Neglected Sites;

H5 – Housing in the countryside;

T8 – Parking.

In addition, the proposals reflect the advice contained in the following Local Planning Guidance Notes (LPGN):

LPGN Note 13 – Housing on the Countryside,

LPGN Note 16 – Parking Standards,

LPGN Note 17 – Trees and Development,

LPGN Note 21 – Space Around Dwellings and

LPGN Note 30 - Residential Design Guide.

The applicant has also been aware of the Technical Advice Notes contained within PPW11.

7.4 The fundamental principles that have informed the design process for these proposals are contained within **Development Objectives Policy GDP1**:

All new development should:-

a) Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.

b) Take account of personal and community safety and security in the design and layout of development and public / private spaces.

c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources.

d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.

e) Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible.

-
- f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.
- g) Secure public services (e.g. gas, water, electricity) to development at minimum public cost.
- h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.
- i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site.
- j) Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity from development that could harm this identity.
- k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.

The proposals before you have been designed to meet each one of the above requirements of the development objectives in Policy GDP1.

Policy H5 states that, outside defined settlement limits, new dwellings will only be permitted where:-

- a) proposals accord with Policies H3, H4, and H8; or
- b) proposals comprise infilling subject to Policy GDP1; or the proposed site is a brownfield site surrounded by dwellings, an essential need to house a full time agricultural or forestry key worker can be established

It is accepted that the proposals are a departure from the development plan, as far as policy H5 is concerned, but material planning considerations make this a justifiable departure. The current development plan, the UDP, is now outdated and bears little relevance to national policy and present circumstances.

Development Principles

7.5 The proposals represent an opportunity for the redevelopment of a brownfield site to meet the following objectives of the extant but outdated UDP and the emerging Wrexham Local Development Plan:

- Redevelopment of brownfield land
- Provision of high quality residential amenity for residents
- Limited infilling in open countryside
- Augmented design standards and building quality in the County Borough
- Protecting and enhancing openness in the countryside
- Meeting a need for high quality executive homes in the County Borough

Green Barrier

7.6 The site is situated in a LDP Green Barrier, lies on the northern side of Gamford Lane and is developed with a much extended two storey farm house and a total of 18no. Processing, workshop and agricultural buildings. The workshops, shippens and pig pens range in height from one to two and a half storeys. The surrounding countryside is flat and characterised by mature hedgerows and established hedgerow trees. WCBC's note Landscape Character Area 13c, The Dee Terraces, describes the visual character as; Uniformly low-lying flat open farmland with long views where hedgerows permit, field pattern is medium to large scale, with fields regular and semi regular in shape, a dispersed pattern of attractive villages, hamlets and farms, traditionally of red brick, Rural villages - Rossett and Holt, both under development pressure weakening character, A483 is a physical barrier and source of noise.

7.7 Policies within both UDP EC1 and PPW11 allow infill development in the Green Barrier where it can be demonstrated that openness is maintained. The eighteen buildings that currently occupy the site are configured in such a way that they significantly impact upon openness. In contrast, the proposals allow important vistas to be enhanced and afford the opportunity for landscaping to create a rural character and integrate the development into the countryside. PPW11 states that; *'inappropriate development should not be granted planning permission except in very exceptional circumstances where other considerations clearly outweigh the harm which such development would do to the Green Belt or green wedge'*. It is proposed that the scheme before you will enhance rather than harm the character of the Green Barrier at this location.

7.8 Policy EC15 of the Wrexham County Borough Unitary Development Plan states that for small scale neglected sites action will be taken to protect and enhance general amenity through the reclamation and restoration of derelict sites and through the improvement of untidy sites, dilapidated buildings and other eyesores, particularly in sensitive locations. Gamford House Farm provides an opportunity to improve the setting of the Special Landscape Area through a sensitive scheme that viably replaces derelict buildings, currently attracting anti-social behaviour, with attractive small scale development. An important feature of this brownfield site is that it is surrounded by land that is in the ownership of the applicant and provides a unique opportunity to integrate the development into the surrounding countryside through sensitive landscaping and the maintenance of openness on the site. The extract from the Landscape Character Assessment report is reproduced below to illustrate the landscape context of the site.

Weight Afforded to UDP, PPW11 and LDP2

7.9 It is clear that the existing **Wrexham Unitary Development Plan 1996 – 2011** is not up to date, and we consider that there are also significant material considerations which now weigh in favour of granting planning permission.

The extant development plan for the County Borough is the Wrexham Unitary Development Plan (UDP) 1996-2011. The UDP was formally adopted in February 2005. However as stated

in the Chief Officer Economy & Planning LDP report to Council on 18 April 2023 ¹, *“the plan is out of date; being underpinned by an evidence base that is over 20 years old. This has been confirmed in recent years by applications and appeals allowed for developments that do not conform with UDP policies. In all cases, there have been material considerations, including evidence prepared to underpin the LDP, that have been considered to carry sufficient weight to justify a departure from certain UDP policies. Some UDP policies do not align with the latest national planning policy”*.

Wrexham Local Development Plan (LDP) 2013-2028.

The binding Inspectors Report was received from Planning and Environment Decisions Wales (PEDW) on 27/02/23. This represents the end of the Examination of the Wrexham LDP. The Inspectors have concluded that, with the recommended binding changes outlined in the report be incorporated into the LDP, the Plan satisfies the requirements of Section 64 (5) of the Planning and Compulsory Purchase Act 2004 and meets the tests of soundness set out in LDP Wales.

On the 18 April 2023, Wrexham County Borough Council decided not to adopt the LDP, however the LDP, which has been found sound at Examination, would now be afforded very significant weight as a material consideration in the determination of planning applications. The LDP2 up to date evidence base which confirms that Gamford House will be excluded from the Green Barrier and SLA designations. Given that these proposed amendments to the **sound** LDP are now well-established, they warrant weight to be afforded to them.

7.10 We remain confident that the proposals to erect 9no. five bed dwellings and a 2 bed bungalow at Gamford House would enhance the character of the open countryside and that can be a justified departure within the terms of PPW11 paragraph 3.55 :-

‘Previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome. It is recognised, however, that not all previously developed land is suitable for development. This may be, for example, because of its unsustainable location, the presence of protected species or valuable habitats or industrial heritage, or because it is highly contaminated.’ and paragraph 3.60 :-

‘However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area’. We feel that the current proposals respect and enhance the character of the surrounding area.

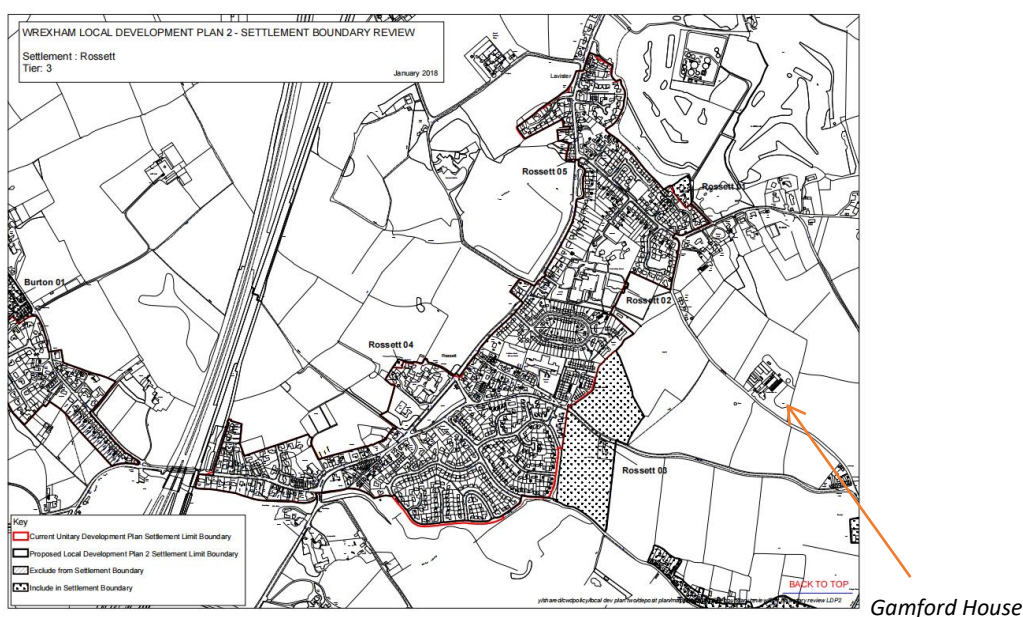
Housing Supply

The emerging Local Plan requirement is to deliver 7750 homes which equates to 517 per annum. The actual rate of completions over the period 2013 and 2021 has only been 254

¹ [\(Public Pack\) Agenda Document for Executive Board, 18/04/2023 10:30 \(wrexham.gov.uk\)](#)

units per annum². This amounts to a significant under supply of housing land in every one of the last 8 years. In addition to dwellings delivered through proposed housing allocations, the LDP is expected to be delivered by other components including windfall sites. This site presents such an opportunity. The acknowledged housing requirements of the County Borough is therefore also relevant and important consideration in the weight afforded to this proposal .

Settlement Boundary Review



The Settlement Boundary Review supporting the LDP has been found sound and the revised settlement boundary extends closer to the Gamford House site.

High Quality Sustainable Design plays an important part in our justification for a departure from the UDP.

7.11 PPW11 paragraph 3.7 states;

'Environmental Sustainability para.3.7: Good design promotes environmental sustainability and contributes to the achievement of the well-being goals. Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), (my emphasis), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution. An integrated and flexible approach to design, including early decisions regarding location.'

² <https://wrexham-consult.objective.co.uk/file/5946895> - Table 2

7.12 The design quality of the proposals is presented to the Council to offer any mitigation to the 'harm' to the character of the site. The alleged harm caused by way of the current proposals no longer exists, because that harm should be measured against the character of the existing site, which we have demonstrated is neither rural nor agricultural but, most likely, industrial.

Ecology and Biodiversity

The development of these proposals reflects the advice in Local Planning Guidance 32 Biodiversity and Development. We are in an ecological emergency as well as a climate emergency, both of which are inextricably linked. We will consider what biodiversity the site supports and how the re-development can contribute to achieving biodiversity net gains over and above policy and legislative requirements and will include the creation of new green infrastructure. Supporting and enhancing biodiversity and green infrastructure will benefit occupants, the wider community and economy with improvements to health, better water management, reductions in pollution etc as well as being of value to species and habitats.

The site is considered to be of limited intrinsic nature conservation value. However it is demonstrated in the Preliminary Ecology Report and the Design and Access statement that mitigation and compensatory measures will be included as part of the development to maintain the biodiversity of the site.

8.0 Sustainable Development – Carbon Zero Housing

The provision of Net Carbon Zero homes at Gamford House is supported by three core principles: energy efficiency, low carbon heat and renewable energy.

Energy efficiency relates to the use of energy for heating, hot water, ventilation, lighting, cooking and appliances. The efficient use of energy reduces running costs and carbon emissions. It also reduces a building's impact on the wider energy supply network, which is also an important consideration. A Powered by Etopia system is proposed for the construction of all 10 dwellings.

Low carbon sources of heat are an essential feature of Net Zero carbon buildings. The new homes will be built with a low carbon heating system and will not connect to the gas network.

Renewable energy generation in the new homes will be at least equal to the energy use of the building on an annual basis so that they are Net Zero carbon in operation.

Net Zero carbon homes are not only good for the planet, they will also be much cheaper to run than a standard new build house. This is due to the combined effects of a lower energy demand alongside greater flexibility of energy use during the day and of solar electricity generation and self consumption.

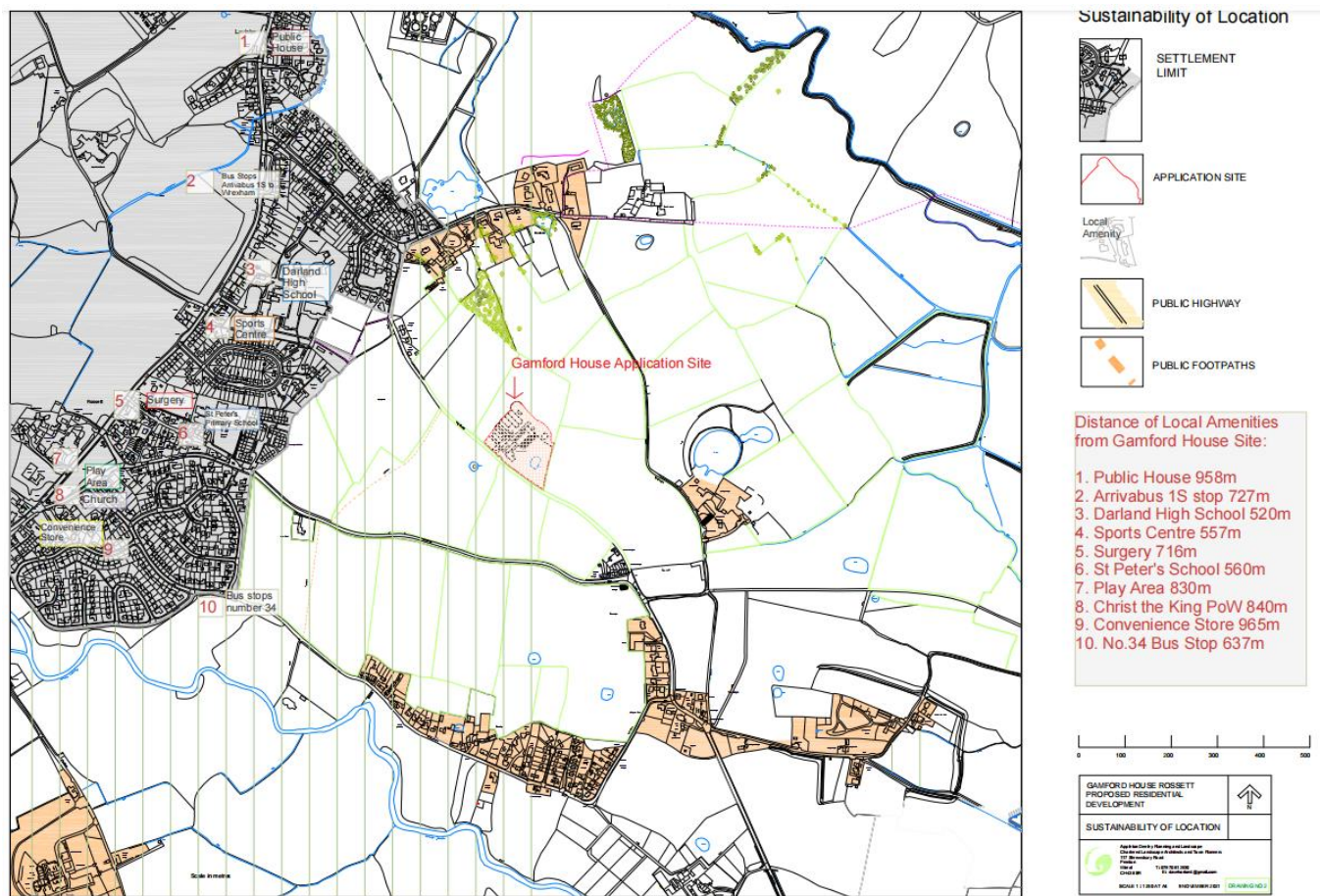
A Net Zero carbon home in operation is very energy efficient and has an ultra low level of space heating demand. It does not use any fossil fuels on site and therefore improves air quality. It also generates renewable energy on-site and is cheap to run.

The building form will be as simple and compact as possible. This will reduce the exposed surface area for heat loss. The orientation and massing of the building will be optimised to allow useful solar gains and prevent significant overshadowing in winter.

8.1 The following sustainability issues have been considered:

- The proposed dwellings will be insulated (roof, walls and floors) according to the most recent building regulation standards in order to reduce heat loss in winter and excess solar gains in summer (300 mm of cross layered loft insulation, 100mm of cavity wall insulation and 100mm of insulation under the concrete ground floor slab).
- Glazing will be sealed double glazing with a 16mm air space and 'low E glazing' to reduce heat loss. Wherever possible materials will be sourced and produced locally and will come from a source that can be renewed without harm to the environment. High quality reclaimed materials can save resources and may also provide a better match with the surrounding development. The scheme will avoid the use of tropical hardwood and look for timber which is certified as coming from sustainable sources.
- The proposed zero carbon houses will produce zero or even negative CO2 emissions by maximising energy efficiency and renewable energy. In Zero Carbon houses, emissions are reduced by using energy efficient materials and innovative space heating and cooling technologies and 'allowable offsite solutions' which is a form of carbon offsetting.
- The proposed zero carbon homes will also have an efficient mechanical ventilation system. The flow of air around and out of a building will be a large factor in determining the amount of additional heating needed. Living in a zero carbon home is a cost effective way to consume less energy and release less CO2 by design, rather than meet higher energy demands.
- The development of this site will contribute to the aim of sustainability through the productive use of this vacant and previously developed land.

8.2 The proposed redevelopment of a brownfield site, utilising two existing access points, is consistent with the settlement pattern of satellite hamlets in this part of Wrexham. The site's access to local services and amenities is illustrated in the plan below:



9.0 Sustainable Location

9.1 One of the key requirements of inclusive design is the need to ensure that development is accessible to all users. This relates not only to its detailed design but also to its locational characteristics. In this case the site is accessible to all and is sited within an area where its occupiers would not have to rely solely either on the private car or on public transport. All users of the development would have equal and convenient access to the development itself and also to the local community and service facilities as those facilities are accessible by a range of transport modes.

The UDP Planning Strategy - Sustainable Development, states:

c) The Rural Villages. The range of services available in these settlements is generally confined to those meeting purely local needs. The settlements themselves are surrounded by attractive countryside and some are not conveniently accessible by public transport. New development is therefore restricted to small sites. The proposed dwellings would be on a brownfield plot in a sustainable location on the out skirts of the large village of Rossett, which has bus stops with a regular service between Chester and Wrexham.

9.2 Policy PS4 requires that development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car. The proposed redevelopment of a brownfield site, utilising existing access points, is consistent with the settlement pattern of satellite hamlets in this part of Wrexham.

9.3 Rossett is identified as one of the Tier 3 Settlements/Local Service Centres in the emerging plan, which are described as having relatively good accessibility by non-car modes. This is an acknowledgement of the fact that the village has a wide range of services including a primary and a secondary school, convenience shops and a regular bus service to Wrexham and Chester. Rossett is therefore a sustainable settlement. The application site itself lies within easy walking distance of the centre of the village, the primary and secondary schools and bus stops served by the Wrexham to Chester service and is therefore in a sustainable location.

9.4 Policy T8 requires that development provides vehicle parking spaces either on site or nearby, in accordance with the Council's current parking standards. Parking provision is shown on the accompanying plans. The development will comply with Local Planning Guidance Note No. 16. This requires provision of 4 no. spaces for each 5 bed dwelling. The site is considered to be within reasonable proximity to the local services and facilities of Rossett. It is acknowledged Gamford Lane is narrow but there is generally adequate room for two cars to pass. Although the national speed limit applies, in reality cars are not likely to be travelling more than 30mph due to the scale and nature of the road.

9.5 There is a pedestrian footpath to the West of the site from Gamford Lane which links up with the playing field, providing off road access for pedestrians to Rossett. An internal access road layout will provide access to 4 no. parking spaces for each five bedroom property. The existing poor quality concrete hardstanding will be removed and resurfaced with an appropriate material to the local environment. There will be sufficient turning space for delivery and waste collection vehicles. There will be the provision of resident cycling parking

10.0 Phosphates / Flood Risk – Flood Consequence Assessment

Phosphates

10.1 The implications for the River Dee and Bala Lake Special Area of Conservation (SAC) must be considered. Foul water from the site will be disposed of via a Septic Tank and transported to the Lavister wastewater treatment works (WwTW). This has provision to remove a percentage of phosphorous from wastewater and consents to discharge treated water into adjacent watercourses (and therefore directly or indirectly into the River Dee), subject to specific limits on the amount of phosphorous within the treated water.

10.2 Whilst the WwTW is currently operating within its consented limits, the existing discharge consent is around 10 years old and pre-date recent case law, and as such need to be reviewed using new data and specially developed models. Development which increases foul water flows to the WwTW will therefore also result in an increase of phosphorous discharges into the SAC.

10.3 It is a requirement that the proposed foul water drainage scheme will not give rise to an increase in phosphorous entering the SAC. Any significant generation of phosphates will need to be subject to a Habitat Regulations Assessment and a mitigation scheme. A calculation has therefore been made of the expected output of Phosphate (P) from the proposals. This is based on a methodology currently used in Carmarthenshire. Please refer to the Phosphates Statement document for our scoping of the potential Phosphorous impacts as a result of these proposals.

10.4 Increased levels of P entering aquatic environments via surface water and groundwater can severely threaten the sensitive habitats and species that are within each SAC. The elevated levels of nutrients can cause eutrophication, leading to algal blooms which disrupt normal ecosystem function and cause major changes in the aquatic community. These algal blooms can result in reduced levels of oxygen within the water, which in turn can lead to the death of many aquatic organisms including invertebrates and fish.

10.5 We have identified an area of land that has a pond and reed beds to be used to offset phosphorous generated by the proposed uses. We are confident that this area will afford mitigation that renders the scheme phosphate neutral. Our calculations are accurate but must be ratified by Wrexham CBC's own methodology.

Flood Risk

10.6 The site is located outside the NRW's Flood Risk Assessment Wales Map area which shows the 0.1% annual probability of extreme flood. The development fulfils the criteria TAN 15 – development and flood risk, and there will be no detrimental impact upon the development through flood risk and no loss of flood storage capacity. As the scheme is for a total of 9 dwellings it is below the number requiring a full Flood Risk Assessment.

11.0 Conclusion

11.1 These proposals have been formulated with the objectives of 'Placemaking' at the forefront.

National Planning Policy (PPW11) advocates that 'Placemaking' should consider the context, function and relationships between a development site and its wider surroundings. The proposals aim to bring social, economic, environmental and cultural value and benefits which go beyond the physical development boundary. The contribution of this development to Rossett and Wrexham County Borough is based on the innovative and forward thinking that has produced a development of carbon zero dwellings which will enhance the character of the landscape through the re-use of a sustainable site.

In preparing this application we also considered the responses from both officers of the Council and Planning Inspectors to previous applications at Gamford House.

On certain issues there remains **common ground**:

- The site is designated as a mixed use site
- The principle of housing on the site was accepted under the approved conversion scheme
- Highway matters in terms of visibility splays and traffic generation are not an issue
- The impact on community facilities and infrastructure are not sufficient to merit refusal
- The site does not fall within the flood plain nor have a flood risk designation.
- There remains a lack of 5 year housing supply
- This application is very **different** from refused application P/2019/0246 for a number of fundamental reasons:
 - The character of the proposals are considerably more sensitive to the location
 - The proposed dwellings will be sustainable Carbon Zero buildings.
 - The development is no longer considered inappropriate in the Green Barrier as it is on a Brownfield Site
- Under LDP2 the site would no longer be within Green Barrier and Special Landscape Area
- Settlement Boundary Review brings the settlement closer to the application site
- The design meets the 'place making' objectives of Planning Policy Wales
- Ecology and Biodiversity will be afforded prominence in the application proposals
- There is a predilection given to the development of brownfield land in preference to greenfield sites

11.2 It is clear that the existing **Wrexham Unitary Development Plan 1996 – 2011** is not up to date, and there are also significant material considerations which weigh in favour of granting planning permission:

- the need to increase housing supply due to a shortage of land genuinely available for housing
- the presumption in favour of sustainable development
- the land does not project into wider countryside, but lies within the defined settlement boundary
- the site is previously developed brownfield land
- The nearby services and facilities at the Local Service Centre Tier 3 of Rossett ensure that the site is in a highly sustainable location
- If the emerging LDP housing requirements are to be achieved there will need to be a significant increase in the number of completions over the remaining plan period. That can only be achieved if more windfall opportunities are brought forward for development
- Given that LDP2, has been found sound at Examination, it should be afforded very significant weight as a material consideration in the determination of planning applications

11.3 The redevelopment of this previously developed site would enhance the character of this sustainable location and remove a blight on the character of the area, whilst introducing a use that will be a less intrusive and environmentally challenging than its previous uses.

11.4 Public consultation on the proposals was undertaken in October 2022 and May 2023 with the co-operation of the Rossett Community Council and Wrexham CBC Community Agents. The outcome was overwhelmingly in favour of a residential and office scheme on the site, with particular support indicated for the carbon zero credentials of the proposals.

11.5 It is considered that the proposals afford an opportunity for Wrexham CBC to benefit from a flagship project that sets the standard in high quality sustainable design. It is considered that openness and protection of the character of the countryside, augmented standards of design and residential amenity, improvements to the quality of the housing offer and sensitive integration of a development into the landscape can all be achieved at this location. It is respectfully requested that the proposals and their wider impacts are fully considered with a view to a recommendation of approval.

PLANNING STATEMENT
SITE AT GAMFORD HOUSE, GAMFORD LANE, ROSSETT LL12 0EW
REDEVELOPMENT OF SITE WITH 10no. DETACHED CARBON ZERO DWELLINGS AND ASSOCIATED LANDSCAPING
WORKS



June 2023