

PLANNING AND AFFORDABLE HOUSING STATEMENT

Land off Berse Road, Caego, New Broughton, Wrexham

Prepared on behalf of

The Applicant – Adra

March 2023



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1 INTRODUCTION

- 1.1. This Statement has been prepared by Grimster Planning on behalf of our Client, Adra, (hereafter referred to as the “Applicant”).
- 1.2. The Statement is submitted in support of a detailed planning application (hereafter referred to as the “Application”), submitted to Wrexham County Borough Council for the proposed development of Land off Berse Road, Caego, New Broughton, Wrexham (hereafter referred to as the “Site”).
- 1.3. The description of development for which detailed planning permission is sought, as stated on the Application Form, comprises the following:

“Residential development and associated infrastructure works including roads and footpaths, public open space, landscaping and drainage including a new pumping station”

- 1.4. The Application comprises a number of supporting plans and drawings, and technical reports, which should be read alongside this Statement.

Pre-Application Consultation (PAC)

- 1.5. To inform this Application, the Applicant has engaged in formal pre-application consultation with Officers at Wrexham County Borough Council regarding the Site’s development potential. A copy of the Council’s written pre-application response is provided in **Appendix 1** of this Statement.
- 1.6. Furthermore, and in accordance with the statutory requirements set out in Welsh Government Guidance, the Applicant has undertaken pre-application consultation with the local community for the proposed ‘major’ development (by virtue of its scale in excess of ten dwellings). Full details, including the feedback/comments received and how these are addressed by the Applicant, are documented in the accompanying Pre-Application Consultation Report submitted with the Application.

2 SITE CONTEXT

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

Site Location

- 2.2. The Site lies within the administrative area of Wrexham County Borough Council.
- 2.3. The Site is situated at the southern edge of the settlement of Caego, adjacent to the built-up area. It is in the Ward area of New Broughton.
- 2.4. In respect of its surroundings (when applying a northerly compass direction):
- Towards the north/north-east of the Site lies the B5101 Berse Road, and a residential dwelling (single storey bungalow) to the north-west beyond which lies residential development on Berse Gardens;
 - Other residential development lies to the north and north-east of the Site beyond Berse Road;
 - Agricultural land lies to the south-west and south of the Site; and
 - The western/south-western boundary of the Site is formed by existing vegetation, beyond which lies a watercourse and agricultural land.
- 2.5. An aerial image of the Site is provided in Figure 1 below:

Figure 1: Aerial Image of the Site

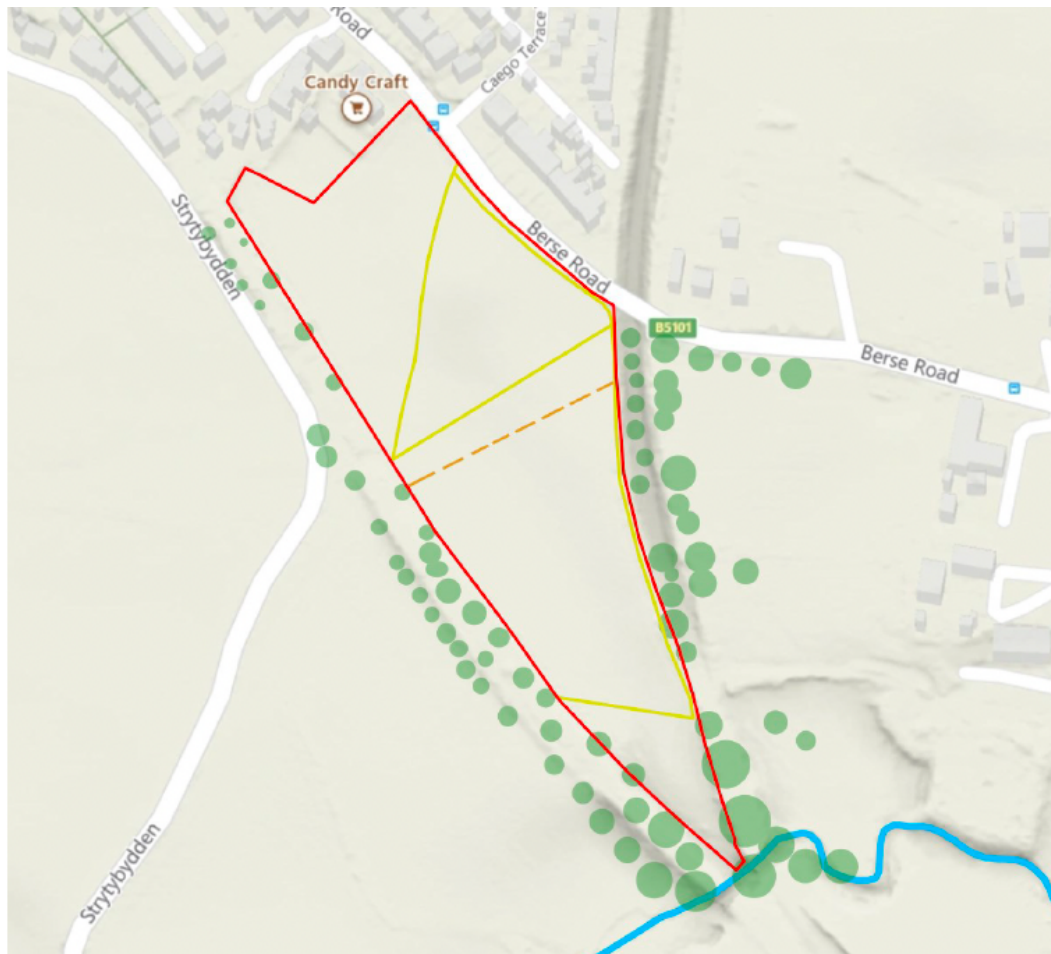


Source: Ainsley Gommon Architects, *Design and Access Statement*

Site Description

- 2.6. The Site area extends to c. 3.44 hectares inclusive of the proposed access. This comprises 1.74 hectares in the area defined by the emerging Local Development Plan Policies Map (for Site Reference 11), and 1.7 hectares of the adjoining land.
- 2.7. The extent of the Site boundary is shown below:

Figure 2: Site Boundary and Location Plan



Source: Ainsley Gomon Architects, *Concept Stage Site Analysis document*

- 2.8. The Site currently comprises greenfield land in nature, used for agricultural/arable purposes.
- 2.9. Vehicular (and pedestrian/cycle) access to the Site is currently available via Berse Road by means of an open access. There is a Public Right of Way along the eastern/south-eastern boundary of the developable area, which would require some minor diversion. There is an existing footpath along part of the Site frontage on to Berse Road, heading north-west from the existing point of access.
- 2.10. The Site lies within the existing 30mph speed limit area along Berse Road.
- 2.11. The Site is slightly elevated adjacent to Berse Road, which slopes down to the southern edge of the Site. There is a difference of c. 14.5m between the lowest and highest parts of the Site.
- 2.12. The Site is not within a Conservation Area and there are no heritage assets on the Site or in proximity to it (designated or non-designated).
- 2.13. The Site lies in Flood Zone A based on the Natural Resources Wales development advice maps, and thus is assessed to be at low risk of flooding.
- 2.14. The Site boundaries comprise an established hedgerow and some trees, particularly along the western/south-southern boundary. However, there is no known Tree Preservation Order covering any part of the Site.

Local Context and Character of Caego

- 2.15. Caego is one of the larger settlements in Wrexham; it is identified as a Local Service Centre in the the emerging Replacement Wrexham Local Development Plan.
- 2.16. The Ward of New Broughton has a population of 3,448 people based on the 2011 census. It has a high proportion of people in age groups 30 to 44, and 45 to 59, suggestive of a population made of single people, couple and younger families.
- 2.17. The B5101 is the main vehicular route through the settlement. Main routes at the edge of the settlements are Gatewen Road and Wrexham Road. As such, it is well connected to the main urban area of Wrexham and town centre, located south-east beyond the A483. Further details on the locational sustainability of the Site are provided later in this Section.
- 2.18. Existing housing within the local area and near to the Site typically comprises traditional style two-storey dwellings that vary in size, design and materials. The character of these properties includes semi-detached and terraced housing typically of a brick build with rough cast rendered facades and slat roofs. Other features include white rough cast rendered facades with brick and stone detailing. More recent housing is located on Berse Gardens to the north of the Site, comprising larger detached, brick-build dwellings.
- 2.19. The submitted Concept Stage Site Analysis document sets out the design development approach to the proposed development taking account of the local characteristics.

Locational Sustainability

- 2.20. In order to appraise the locational sustainability of the Site, we have considered the location of the Site relative to the everyday needs of future residents and access to key services.

Access to Education

- 2.21. The nearest Primary School to the Site is Ysgol Penryhn New Broughton located on School Lane, Southsea in Wrexham; this lies c. 0.9km from the Site, accessible on foot, cycle, public transport and by private car.
- 2.22. The nearest Secondary School to the Site is Ysgol Clwydog located off the A525 in Wrexham. This lies c. 2.5km from the Site.
- 2.23. Overall, the Site benefits from very good access to primary and secondary education.

Access to Shops and Services

- 2.24. There is some existing small-scale retail provision in Caego providing residents with access to their everyday needs. This includes a Lonsdale convenience store located on Windsor Road.
- 2.25. The main retailers are located in Wrexham Town Centre, located within a c. 3-4km radius east/south-east of the Site. This includes supermarkets and other retail provision, including public houses and restaurants amongst others.
- 2.26. Overall, the Site benefits from very good access to services and facilities to serve the everyday needs of future residents. Figure 4.1 of the accompanying Transport Statement provides further details on the accessibility of local services from the Site.

Access to Public Transport

- 2.27. The nearest bus stops to the Site are located immediately adjacent to it on Berse Road (Hall View bus stops). These are accessible from the Site via the existing footpath along the Site frontage, and for which a new bus stop shelter for the northbound stop is proposed as part of this Application within the Site frontage benefiting both current and future residents. There are additional bus stops heading north along Berse Road from the Site. Details of the bus services provided via these stops are set out in Section 4 of the accompanying Transport Statement (and Table 4.1).
- 2.28. There is no railway station in Caego. The nearest railway station to the Site is the main Wrexham Railway Station, lying c. 2km to the east in the town centre. This Station is operated by Transport for Wales, but also supports services operated by Avanti West Coast. It provides for onward travel to major city destinations in England, as well as to other parts of North Wales as far as Holyhead.
- 2.29. Overall, the Site benefits from good accessibility to bus and rail services and with it access to a number of destinations.

Access to Healthcare

- 2.30. There are a number of existing medical centres/clinics in nearby Wrexham, as well as local pharmacies. The same applies to dental clinics/practices.
- 2.31. Wrexham Maelor Hospital is also located in Wrexham.
- 2.32. As such, future residents would benefit from very good access to medical services.

Access to Leisure / Recreation

- 2.33. The nearest formal leisure facilities to the Site can be found in Wrexham (Clywedog Sports Centre and Waterworld), and Summerhill (Gwyn Evans Leisure and Activity Centre).
- 2.34. Within Caego itself, the nearest play area to the Site can be found off Gatewen Road near to its junction with Coronation Road. This is adjacent to the existing playing field. It lies c. 0.8km from the Site, accessible on foot and cycle.
- 2.35. Accordingly, the Site benefits from very good access to leisure and recreation facilities for community use and to support the health and well-being of future residents, including young children.

Summary

- 2.36. Overall, the Site benefits from excellent sustainability as confirmed in Section 4 of the accompanying Transport Statement. It's proposed housing allocation in the emerging Replacement Local Development Plan, as documented later in Section 5 of this Statement, is a further demonstration of its suitability and sustainability for the proposed land-use and scale of development proposed as part of this Application. It is also noted that the Council's pre-application response contained at **Appendix 1** of this Statement confirms the sustainable location of the Site.

3 PLANNING HISTORY

- 3.1. An outline planning application for residential development on the Site (and adjoining land) was previously submitted to Wrexham County Borough Council in February 2016. The indicative site layout showed the potential for in the region of 25 no. dwellings.
- 3.2. The planning application reference was P/2016/0080.
- 3.3. The planning application was refused by the Council's Planning Committee, despite an Officer recommendation for approval.
- 3.4. In refusing the planning application, it was determined that the proposed development would conflict with Policies PS1, PS2, H5, EC1 and GDP1 of the adopted Wrexham Unitary Development Plan, representing an unacceptable incursion into the Green Barrier and would not form a logical extension to the existing settlement.
- 3.5. There has been a material change in planning policy since this previous application was refused, as documented in Sections 5 and 6 of this Statement.

4 PROPOSED DEVELOPMENT

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

Use

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

“Residential development and associated infrastructure works including roads and footpaths, public open space, landscaping and drainage including a new pumping station”

Amount

- 4.3. The proposed development will comprise the development of 47 no. dwellings (Use Class C3), all of which will be affordable in tenure.

Housing Mix, Density and Floorspace

- 4.4. The proposed development will comprise the following housing mix:
- 12 no. 1-bedroom walk-up apartments (suitable for 2 persons);
 - 20 no. 2-bedroom dwellings (suitable for 4 persons)
 - 13 no. 3-bedroom dwellings; (suitable for 5 persons)
 - 2 no. 4-bedroom dwellings. (suitable for 7 persons).
- 4.5. All of the proposed dwellings will be affordable, with the tenure split to be confirmed through discussions with the Council’s Housing Strategy Team.
- 4.6. The proposed density across the Site will be 27.6 dwellings per hectare, based on the housing allocation area which extends to 1.74 hectares. This is annotated on the submitted Site Masterplan.
- 4.7. The wider red-line boundary extends to cover the adjoining land on which drainage works are required to serve the development, and which was agreed with the Council at the pre-application stage. The developable area is only that shown on the Proposed Site Layout.

Scale and Massing

- 4.8. The proposed dwellings will all be a maximum of two-storeys in height, reflective of the typical prevailing local character found to the north and west of the Site.
- 4.9. The proposed mix of dwellings (as set out in paragraph 4.4 above) allows for a layout such that it does not create issues of massing which would be out-of-keeping with the local character.

Layout

- 4.10. The Site Layout has been designed as a sympathetic and logical extension to the settlement. It comprises a naturally contained parcel of land.
- 4.11. The Site Layout has taken account of the topographical characteristics of the Site such that all of the proposed dwellings will be no more than 2-storeys in height.

4.12. The Site Layout has been informed by a detailed assessment of the Site Context, Access and Movement, Site Features and Constraints and a SWOT Analysis undertaken by Ainsley Gommon Architects, and which is submitted as part of this Application (Concept Stage Site Analysis document).

4.13. In summary, some of the key design features are as follows:

- Plots 1 and 2 and 45-47 will positively address the proposed internal access road at the Site entrance off Berse Road. Plots 34-35, 36-44, 1, and 3-6 positively address Berse Road, albeit there is no direct vehicular access to them from Berse Road;
- Properties within the Site are laid out in clusters to provide positive street frontages looking in and out of the Site;
- The layout has been designed to provide for the efficient use of the land to deliver 47 no. new homes, designed to ensure that properties are inward looking and thus positively address the street scene. The scheme has also been orientated such that no private gardens are directly facing on the open space and footpath to the south and east of the Site respectively. Rear gardens face each other to improve security;
- The house and plot sizes are reflective of the local character, incorporating a mix of semi-detached properties and 1-bedroom apartments in a cottage-style format;
- The layout has respected the Council's required separation distances and has sought to avoid any issues of overlooking/loss of privacy consistent with the Council's spacing standards;
- A landscape buffer will wrap around the southern and eastern edges of the developable area of the Site, extending to 1,731 square metres. This area could include new soft landscaping and will also include SuDS features;
- Public open space which is usable by any future residents will be located towards the southern edge of the Site, extending to 3,584 square metres;
- The new pedestrian footpath along Berse Road establishes a connection between the proposed development and the existing pedestrian routes into Caego and Wrexham, whilst retaining provision for the public right of way;
- The Site Layout has sought to retain as many existing trees and hedgerows as possible, consistent with the Local Development Plan. Additional planting will be provided throughout the Site as illustrated on the submitted Landscape Strategy Plan; and
- Consideration has also been given to Secured by Design principles to inform the proposed Site layout and boundary treatments. Accordingly, the proposed dwellings have been designed/orientated such that there is the opportunity for natural surveillance from properties. This will create a safe and accessible living environment. Details of street lighting to be provided within the Site can be dealt with by way of a pre-occupation condition attached to any grant of planning permission.

4.14. Further details on the design development and principles are provided in the accompanying Design and Access Statement prepared by Ainsley Gommon Architects.

Appearance and Materials

4.15. It is proposed that 5 house types will be delivered across the Site; further details, including floorplans, are provided on the submitted drawing package. details, including floorplans, are provided as part of the submitted drawing package and within the accompanying Design and Access Statement and Concept Stage Site Analysis document. These materials have been chosen to complement the grain of the surrounding area.

- 4.16. The palette of materials/finishes proposed by the Applicant comprises off-white render, brick, and a mixture; natural slate roods or concrete tiles, energy efficient grey UPVC double glazed windows in graphite, timber and aluminium; and UPVC and aluminium rainwater goods.
- 4.17. Confirmation of the full and final materials palette can be dealt with by way of a pre-commencement planning condition(s) attached to any planning permission.

Landscaping and Public Open Space

- 4.18. A Landscape Strategy Plan has been prepared and is submitted with the Application; this provides high-level details of proposed hedgerows, gardens, boundary planting and tree/shrub specimens. The Landscape Strategy Plan seeks to provide an attractive green edge and open space which offers opportunities to encourage wildlife and biodiversity throughout the Site.
- 4.19. Each property will have access to private garden/amenity space, and will benefit from boundary treatments which will separate the Site from neighbouring uses/users and provide privacy/security.
- 4.20. A Landscape Strategy Plan (Drawing Ref. LST-XX-XX-DR-L-0101) has been prepared and is submitted with the Application; this illustrates the ability and commitment to provide new and compensatory tree and hedgerow planting across the Site. This will include native planting, ornamental planting, wildflower seeding, as well as turfed private gardens.
- 4.21. As documented earlier in this Statement, usable public open space will be provided towards the southern part of the Site, extending to 3,584 square metres. A separate landscape buffer will wrap around the southern and eastern edges of the developable area, extending to 1,731 square metres, incorporating SuDS features.
- 4.22. The proposed boundary treatments include 1.8m high timber close boarded fences between properties, as well as 1.25m metal railings to the Site frontage onto Berse Road.

Accessibility

- 4.23. Vehicular (and pedestrian/cycle) access into the Site will be created from Berse Road. This will serve as the only point of access into the Site. The visibility splay at the proposed Site access will be 2.4m x 56m as shown on Drawing Ref. 1812/01/A contained in the accompanying Transport Statement. The access junction will operate under priority ('T' junction) with a give-way control.
- 4.24. The proposed access will include a 5.5m carriageway with a 2m combined footway on both sides of the access road, designed to adoptable standards. A 6m corner radii will be provided.
- 4.25. The internal footways to be provided at the entrance to the Site will provide for the safe movement of pedestrians and to encourage non-car travel in view of the Site's locational sustainability and access to public transport services as documented in Section 2 of this Statement. This includes connecting to the existing footway network on Berse Road, providing a safe and traffic free link to local Schools and services, including public transport. A new pedestrian footway will also be provided along the eastern boundary of the Site, within the Site boundary, ensuring connectivity to Broughton Footpath No. 43 to the south. This will be 3m in width at the entrance from Berse Road, narrowing to 2.5m further south in line with the requirements of the Council's Public Rights of Way Officer. It will have a gradient of no more than 1:20. No trees or hedges will be planted within 3m of the footpath, again at the request of the Council's Public Rights of Way Officer.

- 4.26. The road widths, including the features junction and private driveways, have been designed such that the proposed development is accessible via refuse vehicles and emergency vehicles. Swept path analysis has been undertaken to inform the proposed Site layout, details of which can be found in Section 3.4 of the accompanying Transport Statement.
- 4.27. The use of dropped kerbs and tactile paving will assist footpath users and cyclists of all abilities, ensuring that the proposed development is accessible to all. The proposed development and house types have taken account of the Council's guidance, and will ensure access for people of all abilities, as well as the safe movements of pedestrians and cyclists.
- 4.28. The proposed development will comprise a mix of side and front off-road parking taking account of the Council's standards set out in LPGN16. The accompanying Design and Access Statement confirms that the dwellings will have a combined total of 84 spaces, plus visitor parking.
- 4.29. Details of the external street lighting shall be agreed with the County Highways Authority.

Waste and Recycling

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

Drainage

- 4.32. The proposed development will incorporate the following drainage measures, as documented in full detail in the accompanying Flood Consequences Assessment (FCA) and Drainage Strategy, and shown on Drawing Ref. 5073-CAU-XX-XX-DR-C-1600 contained in the Appendices:
- **Surface Water** –ground investigations and infiltration testing has been carried out that have demonstrated that it is feasible to manage a large proportion of the surface water by facilitating its infiltration to the ground. This will be achieved through soakaway chambers. Areas that cannot be drained to infiltration will be directed to a network of swales and filter drains at the east of the Site before being directed in pipe and then overland channel and into the Afon Gwenfro. There will be no discharge into drainage or sewers; and
 - **Foul Water** – pre-planning consultation with Dwr Cymru Welsh Water has identified a suggested point of connection into the public sewer in Berse Road, adjacent to the Site. Given that the eastern parts of the Site are below the level of the public sewer, the proposed development will therefore need to drain to a new pumping station located at the north end of the Site. From there, effluent will be pumped into the public sewer. The foul drainage on the Site will be adopted by Dwr Cymru Welsh Water.

Sustainability Measures

- 4.33. It is noted that Wrexham has declared a climate change emergency in September 2019. Accordingly, and in response, it is anticipated that the proposed development will incorporate some of the following sustainability measures:

- **Dwelling Design** – as an overriding principle, the design of the proposed development has sought to implement the energy hierarchy by reducing energy demands and then increasing energy efficiency in the dwellings. This will ensure that the properties are as energy efficient as possible in order not to adversely contribute towards future climate change;
- **Vehicle charging** – it is likely that vehicle charging infrastructure will be provided to some or all of the dwellings on the Site, with precise details to be agreed with the Local Planning Authority during the determination process based on policy requirements;
- **Cycle Storage** – secure cycle store (possibly in the form of a lockable garden store) is likely to be made available to some or all residents when acquiring their property from the Applicant at the point of sale;
- **Sustainable materials** – materials will be selected from local sources wherever possible to minimise transport energy use and to help sustain the local economy;
- **Water** – in order for the proposed dwelling to utilise as little water as possible, water efficiency within the properties will be maintained through the installation of dual flush toilets and the use of flow restrictors on taps;
- **Drainage** - a sustainable urban drainage system will be implemented across the Site, as outlined earlier in this Section; and
- **Waste Management** – a post-construction domestic waste management and recycling scheme will be implemented. All kitchens will have internal recycling bins to encourage residents to recycle and minimise their own waste.

4.34. Further details are provided in Section 6 of the accompanying Design and Access Statement.

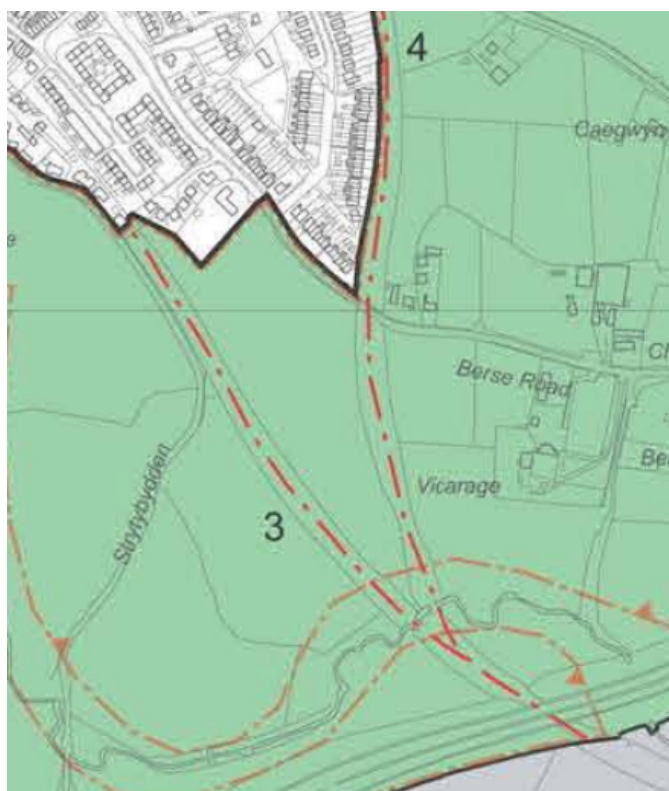
5 PLANNING POLICY CONTEXT

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

Local Development Plan

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

Figure 3: Adopted Local Development Plan Proposals Map Extract



Adopted Local Development Plan

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

Table 1: Relevant Adopted Local Development Plan Policies

Policy Reference	Policy Title
CLF5	Open space requirements from new residential development
EC2	Agricultural Land
EC6	Biodiversity Conservation
EC4	Hedgerows, Trees and Woodland
EC12	Development and Flood Risk
EC13	Surface Water Run-Off
GDP1	General Development Principles
GDP2	Capacity of infrastructure and community facilities
H5	Housing in the Countryside
H7	Affordable housing within new developments
PS1	The Broad Location of Development (and PS2-PS12)
T8	Parking
T9	Walking, Cycling and Horse Riding Routes

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

Replacement Wrexham Local Development Plan

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

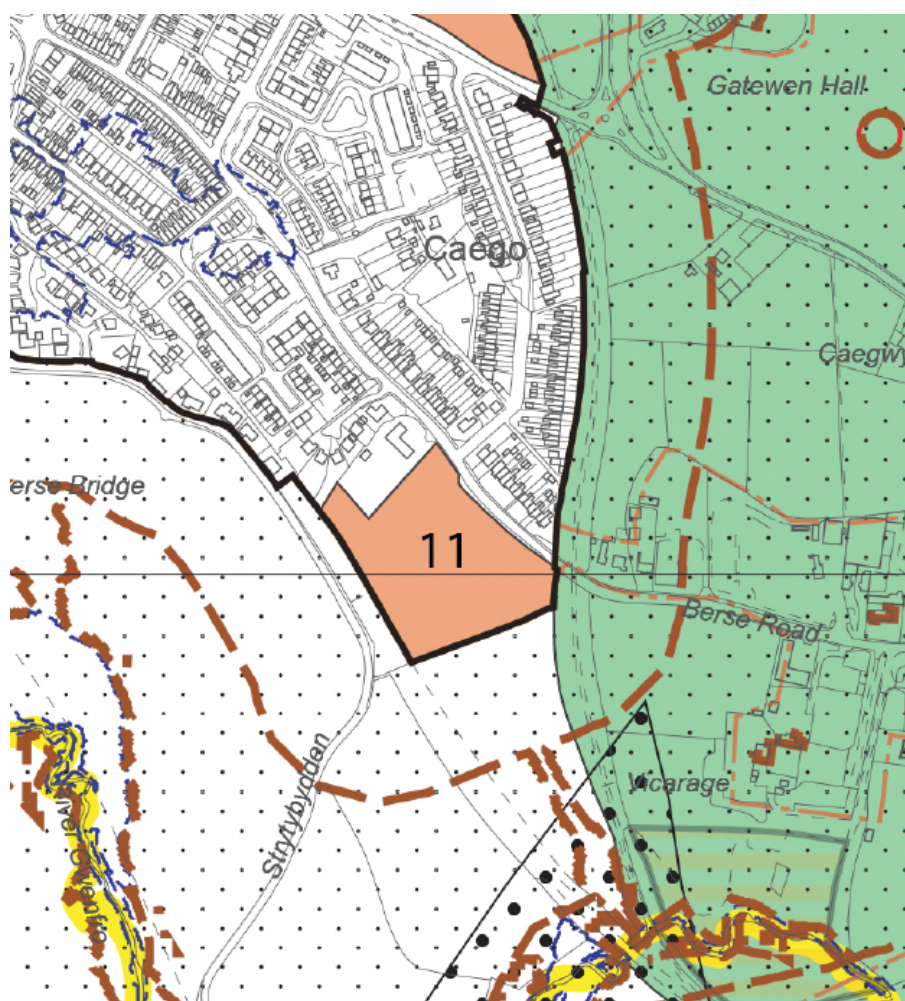
Table 2: Progress on Replacement Wrexham LDP

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

- 5.10. Consultation on the Main Modifications to the emerging LDP took place in May-July 2022, following the Examination in Public Hearing Sessions which commenced in 2019.

- 5.11. Accordingly, the Replacement LDP is now at a very advanced stage and thus is considered to be capable of attracting significant weight in the determination of this Application. Indeed, there is the possibility that the Replacement LDP will be adopted prior to the determination of this Application. The policies of the adopted LDP can no longer be afforded full weight for decision-making purposes.
- 5.12. Both the Development Management Manual (DMM) and the Development Plans Manual (DPM) advise that certainty regarding the context of an LDP will only be achieved when the LDP Inspectors deliver their binding report. However, paragraph 9.4.9 of the DMM does acknowledge that the evidence underpinning an emerging LDP can be used as a material planning consideration when making planning decisions. Paragraph 7.5 of the DPM is also clear that where an LDP is in preparation, refusing planning permission on grounds of prematurity will not usually be justified except in cases where a development proposal goes to the heart of a plan and is individually or cumulatively significant. That is not considered to be the case in respect of this Application for 70 no. dwellings.
- 5.13. To this end, the emerging LDP identifies a requirement for 7,750 new homes to be built across Wrexham County Borough between 2013 and 20218, at a rate of 516 dwellings per annum. Policy H1 of the emerging Replacement LDP identifies a number of housing allocations across the County Borough, including the Site subject to this Application for 25 no. dwellings (Site Reference 11 “*Land South of Berse Road, Caego, New Broughton*”) as shown on the emerging Replacement LDP Policies Map extract at Figure 5 below.

Figure 4: Emerging Local Development Plan Proposals Map Extract



- 5.14. In view of the above, and the weight to now be attached to the emerging Replacement LDP in the determination of this Application, the following policies of the emerging Replacement LDP are considered to be pertinent in the determination of this Application, and are considered further in Section 6 of this Statement:

Table 3: Relevant Replacement Local Development Plan Policies

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

Planning Policy Wales 11

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

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

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

Future Wales – The National Plan 2040

- 5.25. The Welsh Government published the National Plan in February 2021. It serves as the national development framework for Wales, a spatial plan setting the direction for development nationally up to 2040. It provides the basis upon which further guidance, including Planning Policy Wales and Local Development Plans, should be prepared.
- 5.26. Wrexham is identified as a National Growth Area in the National Plan – this will seek to attract and deliver new economic investment, and which in turn will require supporting infrastructure including new housing.
- 5.27. In respect of housing delivery, the National Plan requires a mix of housing types and tenures to create social inclusion and to cater for mixed lifestyles and working arrangements.

- 5.28. Policy 7 focuses on the delivery of affordable homes. Providing housing at levels which meets needs is stated to be a key priority for the Welsh Government. The planning system must facilitate the provision of additional market and affordable housing.
- 5.29. In the North, Local Development Plans should seek to support growth and appropriate development in rural towns and villages. This includes market and affordable housing.

Technical Advice Notes (TAN)

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

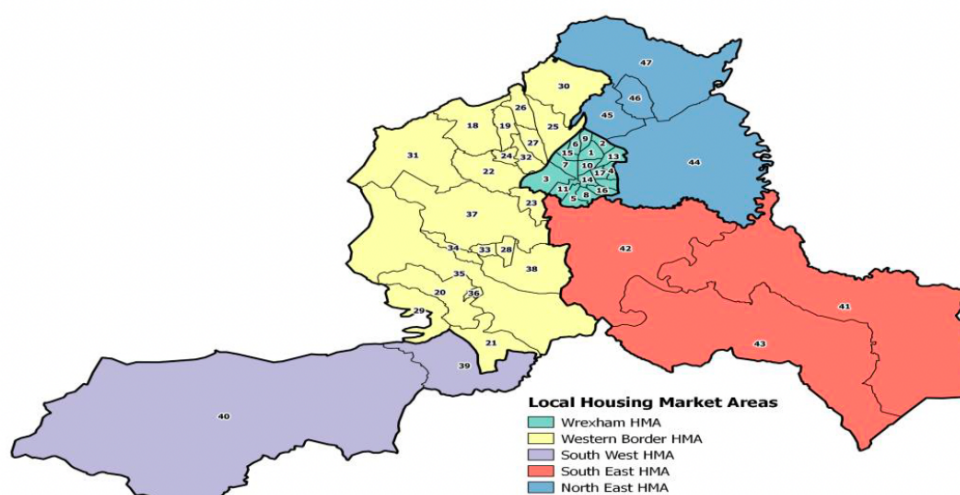
Other Material Planning Considerations / Evidence Base Documents

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

Local Housing Market Assessment (LHMA)

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

Figure 5: LHMA's in Wrexham



- 5.34. The LHMA identifies an annual shortfall of 157 affordable homes across Wrexham County Borough.
- 5.35. Within the LHMA, the Site is identified as lying within Area 32 of the Western Border HMA. Tables 6.5 and 6.6 of the LHMA identified an affordable need for the following:

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

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

- 5.36. The Western Border Sub-Area is identified as having the highest level of affordable housing need, accounting for 49% of the need identified for the whole of the Wrexham County Borough. This is an important material consideration consistent with PPW10.
- 5.37. Within the Western Border HMA, it is clear that there is a need for 1, 2 and 3 bedroom affordable homes.
- 5.38. Since the LHMA was published, the emerging Replacement LDP now contains a Viability Map (as updated in the Schedule of Matters Arising) published in November 2021 and consulted on in 2022. The Viability Map shows the Site as lying within the LL16 North West Settlements Housing Market Area, to which Policy H2 of the emerging Replacement LDP is applicable.
- 5.39. More recently, the Council published its Affordable Housing Prospectus in April 2022. This provides details on the General Housing Needs across Wrexham broken down into Housing Market Areas (based on the LHMA).
- 5.40. This has demonstrated a high annual demand in the Western Border Housing Market Area (205 per annum) and Wrexham Town (86 per annum), with a smaller demand in the North (14 per annum), South East (13 per annum) and South West Housing Market Areas (25 per annum).

Local Planning Guidance Notes

5.41. Wrexham County Borough Council has published the following Local Planning Guidance Notes ('LPGN') which are considered relevant in the determination of this Application:

- LPGN10 – Public Open Space on New Housing Developments
- LPGN16 – Parking Standards
- LPGN17 – Trees and Development
- LPGN21 – Space around Dwellings
- LPGN24 – Designing out Crime
- LPGN27 – Development Contributions to Schools
- LPGN28 – Affordable Housing
- LPGN30 – Design
- LPGN32 – Biodiversity and Development

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

6 TECHNICAL AND POLICY ASSESSMENT

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

Principle of Development

- 6.2. As documented in Section 5 of this Statement, the Site is currently shown on the adopted UDP Proposals Map as lying outside but adjacent to the settlement boundary of Caego, in the Green Barrier. Its development would therefore be contrary to Policy EC1 of the UDP. However, as set out in Section 5 of this Statement, the Plan period for the UDP expired back in 2011, and is now considerably out-of-date. This includes the settlement limits shown on the UDP Proposals Map, and which are controlled by Policy H5. Accordingly, the weight to be afforded to these policies is severely diminished, and the UDP settlement limits are out-of-date.
- 6.3. Wrexham County Borough Council is now well-advanced with the preparation of its Replacement LDP. Indeed, consultation on the Main Modifications to the emerging LDP took place in May -July 2022, following the Examination in Public Hearing Sessions since 2019. The Replacement LDP is now at a very advanced stage and is therefore considered to be capable of attracting significant weight in the determination of this Application. Indeed, there is the possibility that the Replacement LDP could be adopted prior to the determination of this Application.
- 6.4. Both the Development Management Manual (DMM) and the Development Plans Manual (DPM) advise that certainty regarding the context of an LDP will only be achieved when the LDP Inspectors deliver their binding report. However, paragraph 9.4.9 of the DMM does acknowledge that the evidence underpinning an emerging LDP can be used as a material planning consideration when making planning decisions. Paragraph 7.5 of the DPM is also clear that where an LDP is in preparation, refusing planning permission on grounds of prematurity will not usually be justified except in cases where a development proposal goes to the heart of a plan and is individually or cumulatively significant. That is not considered to be the case in respect of this Application.
- 6.5. To this end, the emerging Replacement LDP identifies a requirement for 7,750 new homes to be built across Wrexham County Borough between 2013 and 2038, at a rate of 516 dwellings per annum. Policy H1 of the emerging LDP identifies allocations for housing, including the Site subject to this Application for 25 no. dwellings (Site Reference 11), as shown on the emerging Replacement LDP Policies Map extract at Figure 5 of this Statement. The Site is also proposed to lie within the amended settlement boundary of Caego, New Broughton. This constitutes a material change in policy and circumstance following the previous refusal of planning application reference was P/2016/0080 on the Site by Wrexham County Borough Council.
- 6.6. Taking the above into account, and the need to deliver new market and affordable housing in Wrexham County Borough, the very fact that the Site has been proposed for allocation in the emerging Replacement LDP is considered to weigh heavily in favour of the proposed development. The proposed development of 47 no. dwellings will make a valuable and much-needed contribution to affordable housing needs and delivery in Wrexham in line with the Replacement LDP housing trajectory, and the proposed development of 47 no. dwellings would not be premature to that very emerging Replacement LDP.
- 6.7. The proposed development will provide for the efficient use of the land whilst delivering a mix of house types which respond to local housing needs, delivering predominantly a range of 1, 2 and 3 bedroom homes. It will not lead to unsustainable and harmful development.

- 6.8. In summary, the principle of residential development on the Site is considered to be supported by and consistent with Policy H1 of the emerging Replacement LDP and the evidence underpinning it, as a material planning consideration consistent with paragraph 9.4.9 of the DMM. It also aligns with Policies SP1 and SP2 of the emerging Replacement LDP. This is considered to outweigh any conflict with Policies EC1 and PS1 of the adopted UDP, the weight to be afforded to which in the determination of the Application is now severely diminished. Accordingly, Very Exceptional Circumstances are considered to exist to support the proposed development of the Site.

Housing Needs

- 6.9. As per the information contained in Section 5 of this Statement, there is evidently an affordable housing need in the Western Border Sub-Area, and the North West Settlements Sub-Market Area, in which the Site is located.
- 6.10. The proposed development will deliver 100% affordable housing accessible to local people. This is considered to replacement a significant benefit of the proposed development, and which should attract significant weight.

Housing Mix

- 6.11. As set out in Section 4 of this Statement, the proposed development will comprise the following housing mix:
- 12 no. 1-bedroom walk-up apartments;
 - 20 no. 2-bedroom dwellings;
 - 13 no. 3-bedroom dwellings; and
 - 2 no. 4-bedroom dwellings.
- 6.12. The proposed development will comprise 100% affordable housing. Given that Policy H2 of the emerging Replacement LDP requires nil affordable housing in the North West Settlements Sub-Market Area (as set out in the Schedule of Matters Arising Changes published by the Council in November 2021 and consulted on in 2022), this is a significant benefit of the proposed development. The provision of affordable housing is a material planning consideration to be taken into account in the determination of this Application consistent with paragraph 4.2.25 of PPW11.
- 6.13. The proposed dwellings predominantly take the form of 1, 2 and 3 bedroom homes in the form of apartments and semi-detached dwellings, responding to the housing needs identified in the LHMA Update.
- 6.14. Table 5.8 of the LHMA Update sets out recommendations on the housing mix that should be sought as part of new developments by type and size, as set out below:

Figure 6: Housing Mix in LHMA

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

Source: 2014 Household Survey

- 6.15. As part of the proposed development, the overall housing mix comprises the following:
- 25.5% 1-bedroom walk-up apartments;
 - 42.5% 2-bedroom dwellings;
 - 28% 3-bedroom dwellings; and
 - 4% 4-bedroom dwellings.
- 6.16. Whilst the number of 2-bedroom dwellings proposed is higher than that set out in Table 5.8 above, the proposed housing mix has been discussed with the Housing Strategy Team at Wrexham County Borough Council with a view to seeking to respond to the latest housing needs.
- 6.17. The tenure split of the affordable homes is to be confirmed in discussions between the Applicant and the Council's Housing Strategy Team, and secured by way of a planning condition or obligation.
- 6.18. The proposed housing mix aligns with the housing needs identified in the Council's LHMA. The provision of affordable housing is a material planning consideration to be taken into account in the determination of this Application consistent with paragraph 4.2.25 of PPW11.
- 6.19. The proposed net density across the Site will be 27.6 dwellings per hectare taking account of the Site's location, surroundings, configuration and wider policy requirements (including open space and landscaping/buffer). This also reflects the Site's proposed allocation under Policy H1 of the emerging Replacement LDP.
- 6.20. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policy H7, emerging Replacement LDP Policies H2 and SP1, LPGN28, TAN2 and PPW11.

Locational Sustainability

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

Deliverability of the Site

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

Layout and Design

- 6.25. As documented in Section 4 of this Statement, careful consideration has been afforded to the proposed layout taking account of the Site's surroundings and context, technical and policy requirements including accessibility (road widths, visibility splays, pedestrian linkages), topography, impact on trees/hedgerows/ecology, drainage, and privacy/amenity (of nearby existing residential properties). This has also taken account of the feedback received from the Council as part of the pre-application response contained in **Appendix 1** of this Statement. The submitted Concept Stage Site Analysis document sets out the key considerations that have informed the proposed development.
- 6.26. This has informed the preparation of a proposed layout which provides for the efficient use of the land whilst protecting the residential amenity of neighbouring land-uses. There will be no loss of privacy and light to existing nearby dwellings. The layout and siting of the proposed dwellings is in accordance with the Council's spacing standards in LPGN21 and will provide for the efficient use of land. The Proposed Site Layout has sought to limit as much as possible the impact on existing trees and hedgerows within and surrounding the Site. It will provide for an inclusive, sustainable and logical extension to the settlement.
- 6.27. The house types, plot sizes and variety in the palette of materials have been selected to maintain a consistent design approach and character, being no more than 2-storey in height and of modest proportions utilising the lie of the land. The proposed development will deliver high-quality accommodation and a high-quality living environment which raises the standard of design in the immediate locality but at the same time is reflective of the local character. The layout also provides for the natural surveillance of properties and public spaces/pedestrian and cycle linkages within the Site from properties with a view to designing out crime and to ensure the well-being of residents.
- 6.28. Section drawings are submitted with the Application to illustrate how the proposed development would appear in the street scene.
- 6.29. The proposed net density across the Site will be 27.6 dwellings per hectare; this is considered to be acceptable taking account of the fact that the numbers of units exceeds the emerging LDP indicative figure for the Site, and provides a significant amount of public open space offering environmental, health and well-being benefits.
- 6.30. Each property is designed to allow for access by people of all abilities.

- 6.31. Full details of the proposed development are set out in the accompanying Design and Access Statement, to which reference should be had.
- 6.32. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policy GDP1, emerging Replacement LDP SP13 and DM1, LPGN21, LPGN24, and LPGN30, TAN12, and PPW11.

Agricultural Land Quality

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

Landscaping and Public Open Space

- 6.37. As documented in Section 4 of this Statement, a Landscape Strategy Plan has been prepared and is submitted with the Application; this sets out the Applicant's intentions to provide new and compensatory tree and hedgerow planting across the Site. It also provides details of the proposed boundary treatments within (between plots) and at the perimeter of the Site.
- 6.38. It is noted that the proposed development is required to provide a net gain in biodiversity and a minimum increase in canopy cover of 20% in accordance with the Wrexham County Borough Council Tree and Woodland Strategy. It is considered that the proposed development would achieve this, with ecology enhancements built into the landscape strategy in the form of new planting/natural landscape features and habitat features comprising hibernacula, bat boxes and bird boxes as documented on the Landscape Strategy Plan.
- 6.39. As set out above, existing trees and hedgerows are only proposed to be removed where they are required in order to secure vehicular and pedestrian connections, and to facilitate the proposed development as whole (including new hard surfaces and built form). New tree planting is proposed

across the Site, as shown on Drawing Ref. LST-XX-XX-DR-L-0101 submitted for approval and which includes details of the proposed species mix for approval.

- 6.40. As documented earlier in this Statement, usable public open space will be provided towards the southern part of the Site, extending to 3,584 square metres. This broadly aligns with the need for 0.4ha of public open space per 50 dwellings as per LPGN10, excluding the separate informal landscape space and buffer which will around the southern and eastern edges of the developable area, extending to 1,731 square metres, and which will incorporate some SuDS features.
- 6.41. Details relating to the maintenance of the public open spaces can be secured by way of a planning obligation.
- 6.42. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies CLF5 and GDP1, emerging Replacement LDP Policies SP14, SP20 and DM1, LPGN10, TAN16, and PPW11.

Highways, Road Safety and Car Parking

- 6.43. As documented in Section 4 of this Statement, vehicular (and pedestrian/cycle) access to the Site will be provided for through the creation of a new access from Berse Road along the northern boundary of the Site, designed to adoptable standards.
- 6.44. The proposed arrangements, including road and footpath widths, as described in Section 4 of this Statement are considered to be acceptable and will facilitate safe movements by vehicles (include refuge), pedestrians and cyclists of all abilities into and out of the Site, and through it, as well as providing safe connectivity to the immediate surroundings. The proposed development should encourage and facilitate Active Travel as a result.
- 6.45. In respect of car parking provision within the Site, the standards which have been applied by the Applicant are broadly consistent with those set out by the Council in LPGN16. As confirmed in Section 3 of the accompanying Transport Statement, 84 parking spaces are proposed plus visitor parking. This is slightly below the Council's required standards; the rationale for this is set out in paragraphs 3.5.5 and 3.5.6 of the accompanying Transport Statement. It is also necessary to take account of the sustainable location of the Site, and the improvements proposed as part of this Application to the adjacent bus stop and the footway network within and outside of the Site.
- 6.46. The Transport Statement submitted with the Application has assessed the potential impacts of the proposed development on the local highway network and road safety. This has included an up-to-date speed survey undertaken between 12 and 18th May 2022.
- 6.47. In terms of trip generation, it has been established within Section 5 of the accompanying Transport Statement that the proposed development will generate the following:
 - 9 vehicle arrivals, and 17 vehicle departures from the Site during the weekday AM peak hour; and
 - 16 vehicle arrivals and 8 vehicle departures from the Site during the weekday PM peak hour.
- 6.48. The Transport Statement has also considered the impacts of the proposed development on the Berse Road/Rhyd Broughton Lane Roundabout. In doing so it, it is concluded in Section 5 of the accompanying Transport Statement that the traffic impact of the proposed development on this roundabout will not be material.

- 6.49. Overall, the proposed increase in traffic generated by the proposed development is not anticipated to have a material impact on the operation or safety of the local highway network on Berse Road. As such, there are no highway or transport related reasons to withhold planning permission for the proposed development. Furthermore, it is not considered that there is any requirement for any additional assessment of the local highway network.
- 6.50. As a condition of any planning permission, the Applicant is willing to accept the requirement to submit a Construction and Environmental Management Plan, and which will include details of construction traffic, site compound, contractor parking, and construction hours amongst others.
- 6.51. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies GDP1, GDP2, T8 and T9, emerging Replacement LDP Policies SP12, DM1 and T1, LPGN16, TAN18, and PPW11.

Landscape and Visual Appraisal

- 6.52. A Landscape and Visual Appraisal (LVA) has been undertaken and is submitted as part of this Application.
- 6.53. The LVA has assessed the degree of landscape and visual impact of the proposed development on the surrounding landscape character. In doing so, the LVA has identified and given consideration to the local designations, accessibility, visual envelope and local character areas.
- 6.54. The LVA has identified that the landscape character around the Site comprises a varying topography with a semi-regular mosaic pattern of fields bounded by hedgerows and trees. Multiple urban influences exist in the form of the A483, electricity pylons, rail corridors, industrial and mining occurrences.
- 6.55. The impact of the proposed development has been assessed from 11 different viewpoints. This has identified that the proposed development would result in a 'major' overall visual impact from viewpoints 1 to 4, with the remainder being moderate or negligible. Views of the Site are only available from locations within 500m of the Site, with no views afforded beyond 500m. Viewpoints 1 to 4 are within close proximity to the Site, but will be seen in the wider context that includes the existing settlement pattern and built form.
- 6.56. The overall assessment of the LVA is that the proposed development will have an impact on the wider landscape character but only on a local level from within 500m of the Site where it will be viewed in the wider context of the existing settlement. Whilst the character of the Site will be impacted, there are measures that will help to reduce and offset the impact. These include a high-quality design and specification for both buildings and landscape, reflecting the local vernacular of buildings and landscape features such as woodlands and hedgerows. Additional landscaping will soften the appearance of the development in the landscape such that it integrates, whilst maintain the public right of way connectivity to the east of the Site.
- 6.57. Finally, the proposed housing allocation of the Site in the emerging Wrexham Local Development Plan means that the principle of residential development on the Site has been accepted by the Council, and with that comes an inevitable change to the landscape character and visual impact. However, the change that will result from the proposed development is not considered to be harmful such that it would warrant a refusal of planning permission on such grounds.

- 6.58. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies EC4 and GDP1, emerging Replacement LDP Policies SP13, SP15 and NE3, LPGN17 and LPGN30, and PPW11.

Nature Conservation

- 6.59. A Preliminary Ecological Appraisal (PEA) has been undertaken and is submitted as part of this Application. The PEA has assessed the Site for feature of ecological importance and in doing so, has considered the impacts of the proposed development on ecological habitats.
- 6.60. The PEA has established the following:
- The proposed development will result in the permanent loss of low value arable habitat. The proposed development will deliver new semi-natural habitats and a net gain in biodiversity value. The proposed development will serve as a stepping-stone between the Local Wildlife Sites located to the north-west and south-east of the Site;
 - There are four trees of low bat roosting potential within or adjacent to the Site. However, none of these will be disturbed by the proposed development. With the creation of public open space on the Site, this is likely to enhance the value of the Site through the creation of higher quality foraging and commuting habitat for bats;
 - The creation of the proposed public open space will deliver higher value habitat for nesting and foraging birds, resulting in an overall net gain;
 - There are no identified badger setts within 30m of the Site, and thus no direct impacts are expected. However, badgers are known to be present locally. As such, protective measures should be taken during construction;
 - The proposed development will result in a temporary loss of habitat for notable species during construction. However, there is likely to be a longer-term net gain with the proposed change of use from intensive agricultural use to residential with public open space and new landscaping.
- 6.61. The PEA contains a number of recommendations, including the planting of native species, retention of hedgerow boundaries, careful design of the proposed area of public open space and SUDS, and the preparation of a Conservation Management Plan and Habitat Management Plan (which can be secured by way of planning condition).
- 6.62. Other recommendations including the retention of trees with bat roosting potential, bat boxes, bird nesting box scheme, and reasonable avoidance measures for badgers. These have been taken into account in the preparation of the submitted Landscape Strategy Plan.
- 6.63. The PEA has demonstrated that a net gain in biodiversity is capable of being achieved as a result of the proposed development.
- 6.64. Accordingly, and subject to following recommendations set out in the Survey, the proposed development is considered to respond positively to and is consistent with UDP Policies EC6 and GDP1, emerging Replacement LDP Policies SP15, SP20 and DM1, LPGN32, TAN5 and PPW11.

Trees and Hedgerows

- 6.65. There are limited number of trees and hedgerows on the Site, with some existing features around the perimeter of the Site. Save for the loss of some existing hedgerow fronting on to Berse Road (to secure a new vehicular access), all of these existing landscape features can be retained to

accommodate the proposed development. This is a significant to represent a significant benefit of the Site's development, alongside the additional planting that is proposed as part of the site-wide landscape strategy.

- 6.66. Tree protection measures can be implemented during the construction phase to minimise/mitigate the impact of the proposed development on these species, namely tree protection fencing to be erected prior to the commencement of development. Such measures can be secured through an Arboricultural Method Statement which can be secured by way of planning condition, if it is deemed necessary.
- 6.67. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies EC4 and GDP1, emerging Replacement LDP Policies SP20, DM1 and NE3, LPGN17, TAN5, and PPW11.

Welsh Language

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

Flood-Risk and Drainage

- 6.70. As documented in Section 2 of this Statement, the Site lies in Flood Zone A. It is therefore deemed by Natural Resources Wales to be at a low risk of surface water, groundwater, fluvial and tidal flooding, as confirmed in the accompanying Flood Consequences Assessment and Drainage Strategy. The Site is also not deemed to be at risk of flooding from artificial sources (reservoirs/canals/sewers).
- 6.71. In accordance with TAN15 and the latest national standards on Sustainable Urban Drainage Systems documented in the Flood and Water Management Act 2010, a drainage strategy has been prepared and is submitted with the Application (as set out in the accompanying Flood Consequences Report and Drainage Strategy, and shown on Drawing Ref. 5073-CAU-XX-XX-DR-C-1600. This has identified the proposed surface water and foul water drainage solutions as set out in Section 4 of this Statement. Full details of the proposed drainage solution will need to be agreed in consultation with the statutory consultee bodies (LLFA and Dwr Cymru Welsh Water).
- 6.72. Accordingly, and subject to the recommendations set out in the FCA and Drainage Strategy, the proposed development is considered to respond positively to and is consistent with UDP Policies EC12, GDP1 and GDP2, emerging Replacement LDP Policies SP15, SP19, DM1 and NE6, TAN15 and PPW11.

Ground Contamination

- 6.73. Given the nature of the proposed land-use, a Phase 2 Geo-Environmental Risk Assessment has been undertaken and is submitted within the Application. In addition, a Ground Gas Assessment and Infiltration Testing have also been undertaken and form part of the Application.
- 6.74. These have assessed the potential for existing/future sources of ground contamination on the Site. In summary, these have established the following:
- No potentially contaminative sources of groundwater have been identified on the Site, and the soil testing indicates that there are no elevated concentrations of chemicals of concern within the soils. The Site is not considered to pose a significant risk to controlled waters;
 - Based on the ground gas monitoring data, the Site may be preliminary classified as Green when assessed against the Traffic Light Classification in general accordance with the NHBC guidance and no mitigation measures are likely to be required;
 - Coal mining features associated with the Site will not impact on the stability of the land for the proposed land-use; and
 - The Risk Assessment has identified that there are no contaminants of concern with respect to the proposed residential land-use. The Site is suitable for the proposed land-use subject to the breakout and removal of the asphalt and tarmac from beneath residential plots.
- 6.75. In summary, no potential sources of pollutant linkages to the Site have been identified. In the event that any unforeseen contamination is encountered during the ground works/construction phase, then works should be ceased in that area until it has been assessed. No specific risks have been identified through the Phase 2 Geo-Environmental Risk Assessment which are considered to require any remedial action at this time.
- 6.76. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policy GDP1, emerging Replacement LDP Policies SP14, SP15, DM1 and NE6, TAN15 and PPW11.

Noise

- 6.77. The pre-application response from Wrexham County Borough Council contained at **Appendix 1** of this Statement advised that a Noise Survey could be secured by way of planning condition, along with the submission of a dust management scheme. Neither is listed as a validation requirement in the pre-application response.
- 6.78. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policy GDP1, emerging Replacement LDP Policies SP14, SP15, and DM1, TAN15 and PPW11.

Planning Conditions

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

- Affordable Housing;
- Construction and Environmental Management Plan, including construction hours and dust management;
- Tree protection measures;
- Tree planting – no trees or hedges to be planted within 3m of the footpath;
- Reasonable avoidance measures (as per PEA);
- Noise Assessment; and
- Lighting.

Planning Obligations

- 6.80. The Applicant is committed to engaging in discussions with Officers at Wrexham County Borough Council in relation to securing planning obligations where these satisfy the requirements set out in UDP Policy GDP2, emerging Replacement LDP Policy SP6, and Regulation 122 of the Community Infrastructure Levy Regulations which require that:
- The obligations must be necessary to make the proposed development acceptable in planning terms;
 - The obligation must be directly related to the proposed development; and
 - The obligations must be fairly and reasonably related in scale and kind to the proposed development.
- 6.81. Any requests for financial contributions consistent with the aforementioned policy tests must be justified by up-to-date evidence. Based on the pre-application response contained at Appendix 1 of this Statement, such obligations may relate to primary (and possibly secondary) education facilities in accordance with LPGN27, affordable housing provision in line with LPGN28, and the formation of a management company for the management and maintenance of all on-site public open space and communal spaces.

7 CASE FOR DEVELOPMENT

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

Social Benefits

- 7.2. The proposed development will deliver the following **Social** benefits:
- The delivery of 47 no. new dwellings in Wrexham County Borough where there is an accepted need for new affordable homes in line with the Replacement LDP housing trajectory. The proposed development will involve the development of land allocated for housing in the emerging Replacement LDP, lying within the re-defined settlement limits of Caego, the principle of which is now considered to be established and supported by virtue of the advanced status of the Replacement LDP (and the fact that we are well into the Plan period up to 2028). It will provide for a logical extension to the settlement of Caego at its south-eastern edge;
 - The delivery of 47 no. affordable homes, 100% of the proposed development despite the nil contribution required by emerging planning policy in the Replacement LDP, and which is a material planning consideration. These will predominantly comprise a choice of 1, 2 and 3 bedroom homes reflecting the findings of the LHMA and which will be accessible by local people; and
 - The creation of a high-quality living environment which is a) proportionate to the size of the settlement based on an acceptable density per hectare, b) positively contributes to the character and appearance of the Site and its context by raising the quality of design in the area, and c) is consistent with the Council's LPGNSs, Technical Advice Notes, and the placemaking aspirations set out in PPW11.

Economic Benefits

- 7.3. The proposed development will deliver the following **Economic** benefits:
- The creation of direct construction jobs (on and off-site) over the lifetime of the build programme, and indirect jobs through the local supply chain via the purchase of goods and services;
 - Increased local expenditure (convenience, comparison, leisure, services) to help support and sustain the local community and businesses;
 - Annual Council Tax contributions to Wrexham County Borough Council from the 47. proposed new dwellings;
 - Gross Value Added to the local economy generated by future residents of the proposed development; and
 - Contribution to local education and off-site open space provision where this is justified by up-to-date evidence.

Environmental Benefits

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

- Existing trees and hedgerows within and at the perimeter of the Site will be retained wherever possible, other than where removal is required to facilitate the proposed development. New landscaping, including new tree and hedgerow planting across the Site, provides the opportunity to achieve secure net gains in biodiversity whilst at the same time minimising the landscape and visual impacts of the proposed development;
- The proposed development is not likely to give cause to the loss of any features of significant ecological value, nor cause harm to any protected species. The PEA contains a number of recommendations which can be secured by way of planning condition, with the proposed development capable of securing a net gain in biodiversity;
- The proposed surface water drainage measures which will not increase or exacerbate flood-risk or surface water run-off elsewhere, and sustainable urban drainage systems can be implemented across the Site;
- The creation of safe and adoptable access arrangements from Berse Road, and which will facilitate and encourage safe pedestrian and cycle movements by connecting to the existing network through the creation of new footway linkages;
- The provision of on-site public open space and private amenity space in the form of gardens;
- Development on a sustainable site which provides the opportunity for future residents to travel by foot and public transport to access shops, education, jobs and services, reducing the reliance on private car travel and with it providing for a reduction in carbon emissions. The Site's location means that future residents will enjoy very good access to education, shops and services by walking and cycling, provided for through new and upgraded pedestrian routes/linkages, consistent with the guidance criteria set out in Section 4 of the accompanying Transport Statement. Where the use of the private car is required, the proposed development will have a barely perceptible impact on the highway network and road safety;
- The proposed development will not have any adverse impact on the historic environment, including the setting and significance of nearby heritage assets;
- The proposed development will not have any adverse landscape and visual effects such that a refusal of planning permission is warranted;
- The proposed development will not create any adverse impacts in relation to noise, contamination and air quality/odour; and
- Construction of energy efficient homes using established techniques which the Applicant applies to all of its new-build properties.

Cultural Well-Being

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

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

8 CONCLUSIONS

8.1. This Statement has been prepared in support of a detailed planning application for the proposed development of Land off Berse Road, Caego, New Broughton, Wrexham.

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

“Residential development and associated infrastructure works including roads and footpaths, public open space, landscaping and drainage including a new pumping station”

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

8.4. The principle of residential development on the Site is supported through its proposed housing allocation for 25 no. dwellings under Policy H1 of the emerging Replacement LDP (Site Reference 11), and its location within the re-defined settlement limits of Caego, New Broughton.

8.5. The proposed development will represent a logical extension to the settlement at its south-eastern edge delivering a balanced mix of much-needed, high-quality new affordable housing which provides for the efficient and sustainable use of the land. The proposed housing mix responds to need and market demand, and the delivery of affordable housing should attract significant weight as per paragraph 4.2.25 of PPW11.

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

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

8.8. In the overall planning balance, the proposed sustainable development is considered to be acceptable; the Applicant therefore kindly requests that detailed planning permission be granted in accordance with the UDP (insofar as weight can still be afforded to some of its policies), the relevant policies of the very advanced emerging Replacement LDP which should attract significant weight, and its evidence base as a material planning consideration in the determination of this Application consistent with paragraph 9.4.9 of the DMM, and paragraph 1.18 of PPW11.

Grimster Planning
By Email:
steve@grimsterplanning.co.uk

Your Ref/Eich Cyf	ENQ/2022/0021
Our Ref/Ein Cyf	09/03/2022
Date/Dyddiad	Sharon Holman
Ask for/Gofynner am	01978 298779
Direct Dial/Rhif Union	sharon.holman@wrexham.gov.uk
E-mail/E-bost	

Dear Sir/Madam,

Town and Country Planning Act 1990

**ERECTION OF 41 NO. DWELLINGS AND ASSOCIATED INFRASTRUCTURE WORKS
AT LAND SOUTH OF BERSE ROAD, CAEGO, WREXHAM.**

National Planning Policy:

Planning Policy Wales (PPW) Edition 11

Technical Advice Notes:

- TAN 2
- TAN 5
- TAN12
- TAN15
- TAN18

Development Plan Policies:

Wrexham Unitary Development Plan (UDP)

- PS1 Strategic Policy
- PS2 Strategic Policy
- PS3 Strategic Policy
- PS4 Strategic Policy
- GDP1 Development Objectives
- GDP2 Infrastructure
- H5 Housing in the Countryside
- H7 Affordable Housing

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- CLF5 POS
- EC1 Green Barrier
- EC2 Agricultural Land
- EC4 Trees and Development
- EC6 Biodiversity Conservation
- EC12 Flood Risk
- EC13 Surface Water Management
- T8 Parking
- T9 Access

Local Planning Guidance Notes:

- LPG10 Public Open Space (POS)
- LPG16 Parking
- LPG17 Trees and Development
- LPG21 Space around Dwellings
- LPG27 Contributions to Schools
- LPG28 Affordable Housing
- LPG32 Ecology

Validation Requirements

A formal planning application must be accompanied by the following to be validated:

- Full /Outline planning application forms;
- 1:1250/1:2500 Site location plan with the land subject to the application edged red and any other land in your ownership edged in blue;
- 1:200/1:500 Existing and proposed Block Plans with the site edged in red/black;
- 1:100 Proposed floor plans and elevations;
- Design and Access Statement;
- Phase 1 Habitat Survey;
- Flood Consequences Assessment (FCA);
- Landscape Visual Assessment (LVA);
- Transport Statement;
- Topographical Survey;
- Proposed Section Detail;
- Statutory pre-application publicity and consultation in accordance with Part 1A of the Town and Country Planning (Development Management Procedure) (Wales) Order (as amended in 2016, is required. Any formal application must be accompanied by a pre-application consultation report. The required contents of the report are set out in the above mentioned Order;
- Planning application fee.

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Relevant Planning History

P/2016/0080 Residential Development - Refused on
P/2017/0772 Residential Development - Refused on

Policy

The site is Greenfield land, lying outside of the settlement limit of Wrexham and is situated within a Green Barrier as defined in the UDP. It also contains Grade 2 and therefore Best and Most Versatile (BMV) agricultural land. The proposals do not fall within any exceptions set out in Policy H5 to the otherwise strict controls imposed by UDP policies on residential development in the countryside. The proposals therefore conflicts with that policy as well as PS1, PS3, EC1 and EC2.

The UDP designation of Green Barriers is consistent with the Green Wedges referred to in PPW. Paragraph 3.75 of PPW advises that the construction of new buildings is inappropriate development unless it is for the following purposes:

- justified rural enterprise needs;
- essential facilities for outdoor sport and outdoor recreation, cemeteries, and other uses of land which maintain the openness of the green wedge and which do not conflict with the purpose of including land within it;
- limited extension, alteration or replacement of existing dwellings; or
- small scale diversification within farm complexes where this is run as part of the farm business.

None of the above applies to this proposal and it is therefore inappropriate development for a site located within Green Barrier/Wedge. The development will inevitably result in a significant loss of openness. PPW paragraph 3.74 advises that inappropriate development should not be permitted within Green Wedges except in *very exceptional circumstances*, where other considerations clearly outweigh the harm it would do to the Green Wedge.

Green Barriers/Wedges do not have the permanence of a Green Belt (there are currently no designated Green Belts in Wrexham) and should be reviewed as part of the development plan process. The existing Green Barrier designations have been reviewed (Strategic Green Wedge Review October 2017) as part of the process of preparing Wrexham's Local Development Plan. The application site is proposed for allocation for residential development in the LDP

Notwithstanding the conflicts with UDP policies identified above, section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan in force in the area unless material considerations indicate otherwise. I will discuss these in more detail below.

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Very Exceptional Circumstances

The delivery of housing in the Country Borough is monitored using the Average Annual Requirement (AAR) as set out in a Local Development Plan. Housing delivery is an important material consideration. This is evidenced by the advice in the amended paragraph 4.2.11 of PPW that a review of an LDP may prompted by an under delivery of housing.

It is acknowledged that Wrexham's LDP has yet to be adopted. The Unitary Development Plan therefore remains the operational development plan for the County Borough, however the Plan period expired in 2011 with much of the evidence underpinning it now being at least 20 years old. The UDP strategy, including settlement limits and Green Barriers, are therefore fundamentally out of date and although being a starting point for the consideration of planning applications can no longer be afforded full weight.

Both the Development Management Manual (DMM) and the DPM advise that certainty regarding the content of an LDP will only be achieved when LDP Inspectors delivers their binding report, which takes place following the completion of an Examination in Public (EiP). Paragraph 9.4.9 of the DMM does however acknowledge that the evidence underpinning an emerging LDP could be used as a material consideration when making planning decisions.

The deposit LDP identifies a requirement for 7,750 homes to be built over the 2013-2028 period. The LDP identifies allocations for housing, including the site subject to this enquiry. In total 13 of the LDP allocations are situated outside of UDP settlement limits and 9 lie within the UDP Green Barrier. These 13 sites are expected to deliver 40% of the total LDP housing requirement with sites located in the UDP Green Barrier are expected to deliver 36% of the overall housing requirement.

The need to deliver 7750 homes by 2028 equates to an annual average requirement (AAR) for 517 dwellings over the whole Plan period. The actual rate of completions over the 2013-2021 period is less than half of this. This amounts to a persistent and considerable undersupply of housing. See Table 1 below:

Year	Completions
2013-2014	215
2014-2015	235
2015-2016	199
2016-2017	328
2017-2018	222
2018-2019	362
2019-2020	198
2020-2021	202
Average	245
LDP AAR	517

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In addition to dwellings delivered by allocations, the LDP housing requirement is expected to be met by a number of other components, including development that has already been completed and from committed supply (i.e. sites that have planning permission but have yet to be built out). Since 2013, Greenfield sites that are not proposed for allocation in the LDP (including land in the Green Barrier) have already been developed, are in the process of being developed or have extant planning permissions. When these sites are taken into account then over half of the housing requirement will be met by sites outside of UDP settlement limits.

Taking the above into account, housing supply considerations and the fact that the site has been proposed for allocation in the emerging LDP weigh heavily in favour of the development.

Location of Development

Paragraph 3.60 confirms that development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access and habitat and landscape conservation.

LDP Background Paper BP02b: Settlement Hierarchy and Development Potential (BP02b) identifies settlements in Wrexham as falling within one of 5 tiers based on an assessment of the availability of employment, local services and accessibility by non-car modes:

- Tier 1: Primary Settlement
- Tier 2: Key Settlement
- Tier 3: Local Service Centres
- Tier 4: Minor Villages
- Tier 5: Hamlets.

Broughton is identified as one of the Tier 3 Settlements / Local Service Centres, which are described as having relatively good accessibility by non-car modes. This is an acknowledgement of the fact that the village has a range of services and public transport. It is therefore a sustainable location for development.

Agricultural Land: The site is identified as Grade 2 agricultural land on the Welsh Governments Predictive Agricultural Land Classification maps and accordingly is classed as BMV land. Policy EC2 and PPW paragraph 3.59 are applicable.

Paragraph 3.59 of PPW11 advises that BMV land should only be developed where there is an overriding need for the development and either previously developed land (PDL) or land of lower grade is unavailable, or subject to other constraints that outweighs the agricultural considerations. Where BMV land needs to be developed and there is a choice of land available, PPW11 advises that development should be directed to land of the lowest grade.

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It is clear from what has been discussed above in respect of housing land supply that there is an overriding need for land to come forward for development to deliver the LDP's housing requirements. It is also evident that meeting the housing requirement is heavily reliant upon the release of Greenfield sites. The decision to include this site as an LDP allocation, has been undertaken within the context of a substantial evidence base. This indicates that the housing requirements cannot be met without the loss of BMV land, indeed all of the emerging LDP housing allocations located outside of UDP settlement limits contain at least some BMV land. This is a consideration that has been factored into the relevant Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) processes.

Having regard to the above together with the sustainable location of the site means the loss of BMV land contrary to the requirements of policy EC2 is, in this instance, justified.

Additional Land outside of LDP allocation: The land to the north-east lies outside the UDP settlement limit and within the UDP Green Barrier. As such there would be a conflict with the policies discussed above.

Whilst it is acknowledged that building on the land adjoining the LDP allocation would increase the supply of housing, the LDP offers no support for developing beyond the proposed allocation. Notwithstanding that fact that the site would not lie within an LDP Green Wedge, the site lies outside of the LDP settlement limits and there would remain a policy presumption against residential development.

Whilst the shortfall in housing supply is significant in terms of both amount and length of time, the LDP examination is at an advanced stage. At the time of writing, the potential remains that the LDP will be adopted within the next 12 months thus offering a plan led solution to addressing the housing supply shortage. Furthermore, developing beyond the LDP allocation would represent a further loss of BMV land over and above that anticipated by the LDP and would, in my opinion, represent a conflict with PPW11 paragraph 3.54. I would therefore not be able to support an application for development of land that lies outside of the proposed LDP allocation and settlement limits.

Phosphorous: It is expected that foul water would be disposed of via the mains sewerage system, which connects to the Five Fords wastewater treatment works (WWTW). Five Fords has provision to remove a percentage of phosphates from wastewater and the necessary 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 phosphate within the treated water.

Whilst Five Fords 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 needs to be reviewed using new data and specially developed models. This work is being undertaken by NRW and Welsh Water (WW), but is not expected to be completed until April /May of 2022, at the earliest. Furthermore, whilst the existing provisions in place at the Five Fords removes the vast majority of phosphate from waste water, a residual amount remains. Developments which increases foul waste water flows to the WWTW will therefore also result in an increase in phosphate discharges into the SAC.

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As the proposed development will increase foul water flows to the WWTW, accordingly it is not possible to conclude that the development is unlikely to adversely impact upon the SAC. Adversely impacting upon a statutorily protected site represents a further conflict with UDP policy EC6, in addition to the matters discussed above unless a scheme of mitigation can be proposed that clearly demonstrates no additional phosphorous entering the River Dee. Such a scheme will be required for consideration as part of any formal planning application.

GDP1 – General Development Principles

Any detailed scheme would need to comply with the general development principles set out in this policy.

Any proposed site layout should accord with the guidance contained within LPGN 21 'Space around Dwellings' with regards to separation distances to avoid any significant detrimental impact upon the residential amenities of the occupiers of the nearby properties, and those of the future occupiers of the development, in terms of light, outlook and privacy.

Care should be taken when considering the planting and boundary treatment scheme for the site to ensure that tree planting does not deprive habitable rooms of natural daylight or restrict outlook from these rooms. Boundary treatments will also be key to the integration of the development with the locality, and scale and design should be appropriate for the area to make a positive contribution to the street scene. A detailed Design and Access Statement, which fully outlines the rationale behind the site layout, responding appropriately to the site constraints, should accompany the application.

There is sufficient space on site so that the properties can be sited at sufficient distances from the existing dwellings to the north and west boundaries. Further, there is sufficient distance to allow the dwellings to be orientated so that they front the highway and there would be no significant loss of privacy or daylight to these properties.

In the absence of any elevation details, sections, or indicative street scenes it is difficult for me to confirm if the proposed scale of the dwellings will be acceptable. Though I am not adverse to the proposed mix, care must be taken as to how the units are distributed within the site, taking account of the heights of the existing surrounding dwellings, and making best use of the topography of the land.

As I have yet to see any proposed house types, I would advise at this stage that blank side elevations should be avoided, and a good level of detailing is required to reduce expanses of brickwork. A variety in the materials of construction is also required.

The layout of the development should ensure that there will be high levels of natural surveillance of highways, pedestrian footpaths, parking areas and areas of public open space. Where rear garden areas adjoin the highway or areas of public open space the boundaries will need to be enclosed by walls and/or hedges to deter unwanted access, to ensure that the development complies with the principles of secure by design.

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Specific to the proposed layout:

- Plots 32 and 33, at 2.5 storeys, are too high along the street frontage, immediately adjacent to the bungalow;
- Plot 41 is too close to the highway. The building should be pulled further in to the site in line with plots 32-33 etc. and will need a double frontage to the highways;
- Break up parking between plots 40 and 41;
- Look again at the orientation of Plots 1 and 2, this currently appears awkward and would be better straighten up with a double frontage to plot 1. This will also move plot 2 away from the highway which is currently also too close;
- Plots 21, 22 and 31, need to interact more with the POS to improve the overall interaction with the outdoor spaces.

Due to the potential for contamination issues as a result of historical use adjacent to the site (Landfill within 30m), it will be necessary to attach a condition to any future planning permission to ensure that any potential issues are adequately dealt with.

A noise survey would be required to determine noise levels for both day and night, due to the proximity of the A483. Again, this could be dealt with by condition along with the submission of a dust management scheme. Further guidance on these matters can be obtained by contacting the EHO at heathandhousing@wrexham.gov.uk

GDP2 – Infrastructure and Community Facilities

In 2017, contributions were required for primary schools only, in accordance with Local Planning Guidance note no.27. For the most up to date requirements, please contact the education department at wendy.clifton@wrexham.gov.uk or Dafydd.ifans@wrexham.gov.uk

H7 – Affordable Housing

As the scheme is for more than 25 units, provision for affordable housing may be required. Current advice in LPG28 sets a requirement of 25%, and I note that you are proposing to exceed this by the provision of 26.8%. The proposal would therefore comply with Policy H7 and the guidance, in this regard. In terms of type and tenure, I would advise that you contact the Council's affordable housing officer, Ceri Postle, to discuss specific requirements at ceri.postle@wrexham.gov.uk

The majority of the affordable houses will be grouped together rather than being distributed throughout the development as advised by LPG28. Nevertheless the affordable houses are an integral part of the development rather than being distinctly separate and appear to be the same standard of design as the market houses. As such the fact that they are not more widely distributed will not result in future occupiers being physically or socially excluded.

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CLF5 – Open Space

For schemes of 10 or more dwellings, Public Open Space (POS) will need to be provided at a rate of 0.4ha per 50 dwellings. The plan proposes an area of 4,533 square metres which is conveniently located to users. The open space provision shown on the submitted plan has the potential to strike an appropriate balance between areas of formal and informal recreation, whilst also contributing significantly towards the appearance of the development. It will need to be demonstrated that the area is useable for playing fields and /or equipped children's play areas and open amenity areas. Local Planning Guidance Note No. 10 (POS) provides more specific guidance on this.

I would recommend that high fences are avoided next to PRow and no trees or hedges should be planted within 3 metre of the footpaths as it creates a maintenance responsibility for the landowner that is not always carried out, and can lead to problems for Rights of Way enforcing this responsibility.

Any open space will not be adopted by this Council and so arrangements will have to be made for its implementation and future management, for example, by Management Company. The formation of a management company will be secured by way of S106 agreement, should planning permission be granted.

T8 and T9 – Parking and Access

Parking is required in accordance with the Council's current standards set out in LPG 16. PPW sets out Welsh Government policy which requires the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of private motor vehicles. This is a key principle in considering and determining planning applications and the Design and Access Statement submitted with the application should show how the scheme accounts for the sustainable transport hierarchy.

I have consulted the highway authority for advice on your proposals however I have not received a response. I will forward any response to you, should I receive one, and I recommend that you contact the highway officer, Dominic Jones, directly at Dominic.jones@wrexham.gov.uk

Advice relating to this site provided by the highway authority in 2017, confirmed that the development site is located with a proposed access on to the classified highway known as Berse Road, which is subject to a 30 mph speed limit. A speed survey was carried out in 2016 which showed 85 percentiles speeds are actually 35 mph from the south east and 33 mph for the north west. For these speeds, Welsh government guidelines recommend visibility splays of 2.4 x 54 metres and 2.4 x 50 metres respectively. I recommend that an up to date speed survey is carried out and submitted as part of any future planning application.

*Rydym yn croesawu gohebiaeth yn Gymraeg.
Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.*

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Pedestrian Movement

Any new development will require a new 2m wide footway along the full frontage of the site. It is also considered that a footpath / cycle link should be made from the eastern corner of the site to the existing cycle/footway constructed along the old Railway line.

Traffic Generation

In 2017, Berse Road was quite heavily trafficked particularly at peak hours. There were traffic queueing issues at the Berse Road roundabout 800m east of the development site each weekday, and a significant increase in traffic generation at this roundabout would not be acceptable. 41 dwellings may have a significant impact at the roundabout. An assessment of the amount of traffic to be generated by the development using the nationally recognised TRICS database, is therefore required in support of any future application.

Broughton footpath 43 runs across the site and will be affected by the development. In accordance with Circular 2/1993, consideration should be given to this at the detailed planning stage. I advise that you contact the Public Rights of Way officer, Sean Hanratty, for further guidance at sean.hanratty@wrexham.gov.uk

I am not at this stage able to provide any comfort as to whether the proposal would comply with UDP Policies PS4, GDP1, T8 and T9, and the advice of the Council's highway authority is required before I can confirm support in this regard.

EC12 and EC13 - Flood Risk and Surface Water Drainage

The site lies within Zone A of the Development Advice Maps (DAM) contained within Technical Advice Note 15 Development and Flood Risk (July 2004). TAN15 advises that for development located in Zone A the justification test is not applicable and surface water requirements apply. The acceptability criteria is for no increase in flooding elsewhere to occur as a result of the development. Given the location of development in Zone A, the surface water requirements should be fully assessed as part of any formal planning application. I would advise that you contact the Council's Flood and Water Management Team, for further guidance, at flooding@wrexham.gov.uk or at jamesm.davies@wrexham.gov.uk

If any development were to be progressed you will need to demonstrate that a scheme of drainage can be achieved that will comply with the Welsh Ministers Statutory Standards for SuDS. Full consideration should be given to this requirement at the earliest stage within the design process. Additional advice can be obtained via the WCBC SAB pages at: <https://gov.wales/topics/environmentcountryside/epq/flooding/drainage/?lang=en>

EC4 – Trees

Any scheme will need to provide a net gain in biodiversity and a minimum increase in canopy cover of 20% in accordance with WCBC Tree & Woodland Strategy. Any loss of hedgerow would require mitigation across the site.

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I have consulted the Council's tree officer for advice in relation to the requirements for this site, however I have received no response. I will forward a copy of any advice I do receive, but you may wish to contact the officer, Jon Brewin, directly for further advice at jon.brewin@wrexham.gov.uk

EC6 – Ecology

Any formal application should include a full ecological survey and a plan for how the development can achieve biodiversity net benefit. PPW and subsequent letter to LPAs requires development to provide a net benefit for biodiversity (NBB) i.e. a better outcome than if the site was left undeveloped. It would be preferable to have a landscaping scheme which promotes green infrastructure and integrates biodiversity, sustainable drainage and high quality public open space.

As already mentioned, the site is within the catchment of the River Dee and Llyn Tegid SAC. On 21 January 2021, NRW published an evidence package outlining phosphate levels for all river SACs across Wales. As part of this package, NRW issued a Planning Position Statement, in which they advised that any proposed development that might increase the amount of phosphate within a river SAC catchment could lead to damaging effects to the SAC.

This development has the potential to increase the volume or concentration of wastewater and associated phosphate levels being discharged from the site. As such, I refer you to NRW's Interim Planning Advice:

<https://cdn.cyfoethnaturiol.cymru/media/693022/interim-planning-advice-following-river-sac-compliance-report.pdf?mode=pad&rnd=132557132220000000>

Section 106 Requirements

Likely S106 requirements are:

- a) A financial contribution towards primary (possibly secondary also) education facilities in accordance with Local Planning Guidance Note No. 27;
- b) The provision of affordable housing in accordance with Local Planning Guidance Note No. 28 at a rate of 25% of the dwellings proposed;
- c) The formation of a management company for the management and maintenance of all on-site public open space and communal spaces;

Conclusion

Whilst it is acknowledged that building on the land adjoining the LDP allocation would increase the supply of housing, the LDP offers no support for developing beyond the proposed allocation. Notwithstanding that fact that the site would not lie within an LDP Green Wedge, the site lies outside of the LDP settlement limits and there would remain a policy presumption against residential development. Whilst the shortfall in housing supply is significant in terms of both amount and length of time, the LDP examination is at an advanced stage. At the time of writing, the potential remains that the LDP will be adopted within the next 12 months thus offering a plan led solution to addressing the housing supply shortage.

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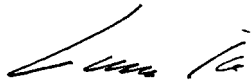
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Furthermore, developing beyond the LDP allocation would represent a further loss of BMV land over and above that anticipated by the LDP and would, in my opinion, represent a conflict with PPW11 paragraph 3.54. I would therefore not be able to support an application for development of land that lies outside of the proposed LDP allocation and settlement limits.

The number of houses proposed may also have an unacceptable impact on the highway network, in terms of traffic generation. Finally, the impact of the discharge of phosphorous into the SAC, may be a significant issue which cannot be overcome.

I trust the above is of assistance however please note that my comments are made without prejudice to the determination of any formal application that may be submitted.

Yours faithfully,



Pennaeth yr Amgylchedd a Chynllunio/Head of Environment and Planning

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