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Mr L Isted
Chief Officer Planning and Regulatory Services
Wrexham County Borough Council
Guildhall
Wrexham
LL11 1AY

20 December 2021

Dear Mr Isted

Ty Nos. Discharge of Drainage Condition. (Condition 7 on Permission ref P/2021/0263)

PP ref: PP-10490208

I am instructed by Clwyd Alyn Housing Ltd to submit the enclosed application to discharge the drainage condition (no 7) imposed on the planning permission.

In submitting this application I have had regard to the consultation response of National Resources Wales (No Objection) to the planning application as well as the advice of officers to committee in June 2021 in respect of drainage as follows:

Drainage: The site would be connected to the mains sewer which is served by Five Fords Waste Water Treatment Works. This works has capacity and consent to process additional volumes of phosphates. Welsh Water has recommended that a condition requiring a drainage scheme to be submitted and approved by the LPA.

CAHL has, separately submitted an application under S104/S016 to Dwr Cymru/ Welsh Water for Statutory Drainage Approvals and to Highways under S278. SAB approval is in place.

Chartered Town Planning Consultant - Mr P G Lloyd BA (Hons) MRTPI



Paragraph 3.6 of Circular 16/2014¹ states: *Conditions should not repeat the provisions of other conditions or duplicate controls under other legislation unless there is a planning reason for doing so. For example, conditions relating to drainage should not be imposed where the matter can be adequately addressed through Building Regulations.*

My client is aware of the Phosphate position across Wales and the County.

NRW notably did not object to the application for the replacement shelter development despite issuing its Planning Position Statement earlier in 2020.

There is, as you know, a wider context to the proposal to redevelop Ty Nos, as it sits within a framework of other projects targeting the housing needs in the county. It is pivotal to the delivery of a wider range of housing schemes across the County Borough. Should it not be possible to implement the planning permission there are wide ranging corporate housing objectives and funding streams at risk.

Clwyd Alyn Housing Ltd and the Council (who will provide Ty Nos in partnership) have examined the extent of homelessness in the County. This is summarised below.

There are currently 580 open cases of homelessness in the County. For a variety of reasons, levels of homelessness are increasing. Homeless people are placed in Temporary Accommodation across the County, via a mix of private rented accommodation and LLA managed properties, Hotels, B and B's, and Wrexham's own housing stock allocated for Temporary Accommodation purposes.

In particular and crucially, there is an existing homeless shelter at the site. The existing shelter has a capacity of 16 overnight spaces. In addition 3 staff are present, making 19 people resident over night. It operates at capacity.

This shelter houses homelessness of people from Wrexham County, providing them with temporary accommodation on a temporary basis whilst interventions to re-home them are put in place. It provides them with a safe, warm overnight place to stay.

¹ The Use of Planning Conditions for Development Management. Welsh Government.

The replacement development proposes 19 no. one bedroom units. Note is replaces the existing facility which is an existing need. It does not therefore automatically follow that a material increase in phosphate discharge from this development occurs as it does not meet a newly created housing need. It replaces existing facilities for a current need.

In simple terms the development replaces existing accommodation, housing existing Wrexham residents who are from and will remain in Wrexham. It will create no additional phosphate load on the County or the River Dee SAC. It will displace existing loads. I have every reason to expect it would be neutral for the reasons set out.

I trust you will find all in order and the application satisfactory on that basis. Should you require anything further, do not hesitate to contact me.

Yours Sincerely.

PG Lloyd

For and behalf of PLPlanning

Cc Brenig Construction Ltd



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