

PLANNING SUPPORTING STATEMENT

Outline planning application for the erection of up-to 74 dwellings together with vehicular/pedestrian access from Holt Road, open space which can be used with adjoining land to the west to create a formal sports pitch, site landscaping, sustainable drainage and other related infrastructure

On behalf of Glyndwr University

**Land at Holt Road
Wrexham**

June 2018

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1. Introduction

- 1.1 The application submitted on behalf of Glyndwr University seeks outline planning permission with access for a housing development of up-to 77 dwellings. The specific land uses are identified in Section Four of this Planning Statement but the description of development is:

Outline planning application for the erection of up-to 77 dwellings together with vehicular/pedestrian access from Holt Road, open space which can be used with adjoining land to the west to create a formal sports pitch, site landscaping, sustainable drainage and other related infrastructure

- 1.2 Prior to the submission of the application, the views of the local community were sought via a Pre-Application Consultation exercise. A Pre-Application Consultation Report is submitted as part of this planning application as a separate document. The indicative masterplan and parameters plans were changed as a result of liaison with Welsh Water. This is explained further within the Design and Access Statement.

- 1.3 The application for the proposed development is in outline. All matters except access are reserved for subsequent approval. The application comprises the following documents:

- Planning Application Form including Ownership Certificate
- Landscape and Visual Impact Assessment produced by Axis
- Statement on Historic Environment Matters (ref edp4846_r004_140618)
- Drawing No.531-17-4-AL 100-001 Site Location Plan (redline plan)
- Drawing No.531-17-4-AL 100-003 Topographical Survey
- Drawing No. 531-17-AL-00-001 Holt Road Proposed Masterplan
- Drawing No. 531-17-AL-00-002 Holt Road Parameters Plan
- Design and Access Statement
- Energy Statement (ref L5195/18.7) produced by FutureServ
- Utility Statement (ref L5350/18/) produced by FutureServ
- Tree Constraints Plan (ref 18164/S4/TCP/01) produced by Indigo
- BS5837 Tree Survey Assessment (ref 18164/S4/A1) produced by Indigo
- Transport Assessment produced by ITP
- Flood Consequence Assessment and Drainage Strategy
- Preliminary Ecological Appraisal
- Landscape layout and landscape strategy

- 1.4 An Illustrative Master Plan is also provided but is submitted 'for illustrative purposes only'. It is not intended to be the only way in which residential development could be laid out. This is a reserved matter.

2. Site Description and Surroundings

- 2.1 The application site extends to 3.267 hectares (8.07 acres) and is situated within the urban area of Wrexham. The site is broadly rectangular shaped being bounded to the north by the rear gardens of Denbigh Close and Monmouth Road, to the east by the rear gardens of housing fronting onto Goulbourne Avenue to the south by Holt Road and the rear gardens of properties on Landford Close and to the west by the rear of properties fronting onto Dean Road and the Dean Road Family Centre. The site is open to the west and therefore unofficial access is currently taken to the site by the general public.
- 2.2 Topographically, the site is generally flat and there are no public rights of way which cross the site.
- 2.3 The surrounding area is primarily a residential suburb and therefore housing is the predominant land use. There are also a number of local schools and facilities within the local area. These are outlined within the accompanying transport statement.
- 2.4 The site is currently open land, which is maintained as a sports pitch. There are existing trees and vegetation on the boundaries to the adjoining properties. The land is used by local sports clubs under an informal arrangement with Glyndwr University. The subject site adjoins land to the west which is owned by Wrexham CBC and is also used for sports. This arrangement is discussed further within Section Four.

3 Campus 2025

- 3.1 This planning application forms part of the overall Campus 2025 Estates and Learning Environment Strategy which is now being pursued by Glyndwr University (the University). Campus 2025 has assessed the University's existing estate and is based upon a recently undertaken extensive package of surveys of building condition, space utilisation, future academic requirements etc.
- 3.2 The conclusion of this exercise is that the University's Estate does not fulfil the principles and objectives of Glyndwr University and therefore needs a significant package of investment and redevelopment for the University to sustain a viable position within the higher education sector. The issue is not about expanding the overall size and academic capacity of the University Estate.
- 3.3 Indeed, the surveys show that the overall occupancy levels across the estate are low and that if the University needed to increase student numbers and/or the range of academic courses it offers, then there is sufficient capacity within the existing University Estate to accommodate such growth. The key requirement is to upgrade and modernise Glyndwr University's facilities to modern standards when compared to other Universities throughout the UK, so that the University can sustain a viable offering and student numbers across the range of academic courses which it provides. There is also a statutory requirement for Glyndwr University to maintain their existing listed buildings, which Campus 2025 enables Glyndwr to discharge.
- 3.4 Given this context, Campus 2025 is a package of planning applications, which enables the ambitions of Campus 2025 to be realised. The applications are all linked through the pressing economic, social and environmental case for Glyndwr University to improve its overall estate. Once the development identified within Campus 2025 is delivered, then this will bring substantial benefits:
- a) in the delivery of academic courses at Glyndwr University;
 - b) in the student accommodation offering within Wrexham and significant knock-on benefits to the town from a sustained and increased student population;
 - c) in the sale of land assets which are not required by Glyndwr University and can make a more positive contribution via residential development to meet Wrexham's housing need;
 - d) By enabling Glyndwr University to continue to attract new students and sustain a viable position in the higher education sector;
 - e) ultimately via the retention of Glyndwr University, with its significant contribution of jobs, investment and profile within the Wrexham economy.

- 3.5 The subject application will form part of Campus 2025 by providing 77 new homes within Wrexham and by providing funding back to Glyndwr University from an eventual land sale of consented development land to a housebuilder. Proceeds from the sale of the land sale will be invested back at the Plas Coch Campus and Regent Street Arts School.
- 3.6 It should also be noted that because this application is being brought forward direct by Glyndwr University themselves, there is not a developer taking an element of profit from the land sale, therefore this approach maximises the revenue available for the University.
- 3.7 The package of planning applications forming Campus 2025 is detailed on the table below. Whilst these are all individual planning applications and are submitted for determination as such, Campus 2025 is an overall project, whereby all of the individual sites make up the overall enabling package. It is therefore envisaged that the application will be determined by Wrexham CBC as part of a collective package of applications.

Site	Proposal
Plas Coch	Demolition of Student Union Building and reconfiguration of main campus to provide new Learning Gateway and Inner Gateway Buildings, new Engineering Building, new Sports Hall Extension. Campus 2025 also involves significant package of refurbishment of the existing social learning and academic tuition space, together with improved and reconfigured car parking and significant improvements to the overall public realm and campus environment.
Regent Street	Refurbishment and improvement of Arts College (which is a listed building) removal of redundant outbuildings (not listed) and construction of new 107-bed student accommodation facility.
Northern Quarter	Demolition of redundant student halls and construction of up to 420 apartments on surplus land within Plas Coch Campus.
Wrexham Village	Following demolition of the student halls on the Plas Coch Campus, it is proposed to build a new student accommodation facility of 197 bed spaces. This adjoins an existing 323 bed facility (Wrexham Village), which was constructed within the last ten years and is currently operated by a third party. Wrexham Village is being purchased by Glyndwr University and will create a combined facility of 520 bed spaces, adjacent to the Plas Coch Campus.
Holt Road	Outline planning application for 77 residential units. With planning in place, this site will be sold and 100% of the funds will be utilised in the improvements at Plas Coch and Regent Street
Gatewen Road	Outline planning application for 112 residential units. With planning in place, this site will be sold and 100% of the funds will be utilised in the improvements at Plas Coch and Regent Street

3.8 Due to the proposals involving both Listed Buildings and a Conservation Area, then the overall package of applications is as follows:

Site	Proposal	
Glyndwr University Plas Coch Campus	Detailed planning and Listed Building Application for Demolition of student union and other redundant buildings, and redevelopment of academic campus to provide new Learning Gateway and Inner Gateway Buildings, new Engineering Building, new Sports Hall Extension, redevelopment of multi-use games area, refurbishment of social learning and academic tuition space, together with new car parking, infrastructure, landscaping and public realm works.	Application One
Regent Street Arts College	Application for refurbishment and improvement of Arts College, demolition of ancillary buildings and construction of new 107-bed student accommodation facility	Application Two
	Demolition required within conservation area of ancillary outbuildings within Arts School to enable construction of 107 bed student accommodation facility.	Application Three
Land at north west of Plas Coch Campus	Demolition of redundant student halls and construction of up to 410 apartments with access from B5101, together with car parking, site landscaping and associated infrastructure on surplus land within the overall Plas Coch academic Campus.	Application Four
Land west of Crispin Lane	Outline application for student accommodation facility of up to 197 bed spaces, with parking and landscaping.	Application Five
Holt Road	Outline planning application for the erection of up to 77 dwellings together with vehicular/pedestrian access from Holt Road, open space which can be used with adjoining land to the west to create a formal sports pitch, site landscaping, sustainable drainage and other related infrastructure	Application Six
Gatewen Road	The erection of up to 112 dwellings together with vehicular/pedestrian access from Gatewen Road, open space, site landscaping, sustainable drainage and other related infrastructure	Application Seven

4 Application Proposals

- 4.1 The Parameters Plan submitted as part of the application and is incorporated in the DAS which also contains the Illustrative Master Plan. The planning application is in outline form but with approval sought for the vehicular access from Holt Road. Other matters such as scale, layout, housing mix and landscape are reserved for future approval.
- 4.2 The Parameters Plan indicates a potential way in which the site could be laid out, including the locations of the built forms of development, open spaces and structural planting. To give a high degree of certainty to the outcome of the process, Glyndwr University submit this information on the basis that any planning permission would include conditions requiring the principles of the Framework Plan and the content of the supporting DAS to be adhered to.
- 4.3 The proposed development comprises the following main elements:
- Residential development of up-to 77 dwellings of varying sizes. The residential development would possess a gross density of circa 31.4 dwellings per hectare;
 - 25% of the proposed dwellings would be for affordable housing to accord with Wrexham CBC's policy (discussed further within Section 5);
 - Vehicular access from Holt Road in the form of a priority junction with the potential to create a pedestrian link through the adjoining land to the west (discussed below) through to Dean Road.
 - Green Infrastructure extending to circa 0.91 hectares (44% of the application site), including 0.82 Hectares (2.03 acres) which are proposed to be transferred to Wrexham CBC via a subsequent planning obligation agreement. The Green Infrastructure enables the creation of a formal pitch, when the land to be transferred is combined with land to the west of the application site (which is owned by Wrexham CBC). It is the intention for the combined parcel of land to become a formal sports pitch, which is owned by Wrexham CBC.
- 4.4 Through the detailed technical and environmental analysis undertaken by the Consultant Team as part of the initial master planning process, the capacity of the site has responded to a range of factors including:
- A desire to use the land as efficiently as possible and provide a mix of housing;
 - A legible hierarchy of streets, with a main loop road around the site and smaller spur roads running from this;
 - Buildings heights predominantly no higher than 2-storeys;
 - Provision of adequate off-road parking for each dwelling;

- Seeking to promote a style of development which reflects the character and appearance of the local area, albeit the detailed design and appearance of buildings would be a reserved matter;
- Usable and significant open spaces which integrate with adjoining land;
- A positive relationship and interface between the proposed housing and the neighbouring residential properties to maximise natural surveillance, respect the living conditions of the existing occupiers and integrate the proposal into the wider environment.

4.5 The DAS contains more detailed information which establishes parameters for the scheme.

5 The Development Plan

- 5.1 The development plan consists primarily of Planning Policy Wales (November 2016) and the Wrexham Unitary Development Plan 1996-2011. Also relevant to various specific topics are various Technical Advice Notes issued by the Welsh Government, together with Local Planning Guidance Notes issued by Wrexham CBC. There is no relevant planning history for this site, as it has not previously been the subject of any planning applications.

Wrexham Unitary Development Plan

- 5.2 The Wrexham Unitary Development Plan 1996-2011 is now significantly out of date. This plan was produced to deal with the development needs of the Authority from 1996 to 2011 and therefore does not contain, nor was ever intended to contain any housing allocations for 2018. Decision makers will therefore need to afford an appropriate level of weight to policies in 2018 which were only ever intended to guide development up to 2011. This is discussed further within this statement.
- 5.3 The site does not benefit from any specific allocations and is simply white land, within the settlement limit of Wrexham Town Centre.
- 5.4 The broad location of development is set out within Policies PS1 – PS12. The PS Policies cover a range of issues, but those most relevant to this application include:
- Policy PS1 *“New development for housing, employment and community services will be directed to within defined settlement limits”*. The proposal clearly accords with this element of policy, as it falls within the boundary of the largest settlement within Wrexham CBC’s administrative area.
 - Policy PS4 *“Development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car.”* In proposing residential development and open space within the urban area of Wrexham, then the proposal accords with this policy in maintaining the existing settlement pattern, integrating with the surrounding land uses and maximising the potential for trips which do not involve the car.
- 5.5 Within the UDP, the General Development Principles are set out within Policy GDP1, which covers a range of themes. It is important that proposals can demonstrate accordance with Policy GDP1, due to a link between this policy and Policy H2 (discussed later within this section). The following themes within Policy GDP1 are relevant to this application:

- **Scale Design & Layout.** Whilst these are reserved matters and the proposals are only indicative at this stage, the proposals do accord with the adjacent areas, by providing new housing within an existing and established residential area and facilitating the delivery of a new sports pitch which can be secured for use by the community.
- **Safety and Security.** The proposals seek to place rear gardens adjacent to the rear gardens of properties adjoining the site, thus the scheme has been designed from the outset with streets which are overlooked.
- **Safe and Convenient Pedestrian and Vehicular Access.** The scheme utilises a new vehicular junction to Holt Road, plus linkages through the adjoining land are proposed, which would enable pedestrian accesses through to Dean Road.
- **Public Transport Facilities** – these are outlined in the accompanying transport assessment. Given the locations of the site within the urban area of Wrexham and the local facilities within walking distance, then the site scores well from a sustainability perspective.
- **Environmental Safeguarding.** The proposals accord with the uses in the local area and do not result in any significant issues from noise, odour and vibration. Any effects from the construction period will be limited to this phase in the same way that any construction activity does. Planning conditions regarding construction hours of operation, traffic management etc can be used to control this aspect.
- **Secure Public Services.** The site is located within the urban area of Wrexham and effectively surrounded by existing utility networks, which can be utilised by the new development.
- **Nature Conservation and Wildlife.** The proposal retains the existing hedgerows and trees within the perimeter of the site.
- **Flooding, Soil Erosion, Landslides and Contamination.** The site does not flood, nor is there any issue with contamination.
- **Secure the Development of Sustainable Communities.** The site is located within the urban area of Wrexham and therefore enables new housing to be developed within the single largest and most sustainable settlement within the entire Authority, with the greatest potential to achieve modal shift away from the private car and to encourage walking, cycling and the use of public transport. The proposals also secure land for

sports provision in an appropriate location within the urban area of Wrexham, thus enhancing the social and environmental credentials of Wrexham.

- 5.6 Policy GDP2 relates to the capacity of infrastructure and states a requirement for the developer/landowner to enter into a planning agreement/obligation which is fairly and reasonably related in scale and kind to the proposed development. Glyndwr University intend to fully consider any appropriate contributions in accordance with Article 122 of The Community Infrastructure Regulations 2010 with the aim of producing a planning agreement for the subject land in due course.
- 5.7 Policy H1 deals with housing allocations, which (as discussed previously) should be afforded little weight, as those allocations were for the period 1996-2011 and therefore do not deal with allocations in 2018.
- 5.8 Policy H2 is key to the determination of this application, as it provides a policy which supports the development of land within settlement limits above and beyond the site allocations found within H1. Policy H2 states that:

“Residential development on unannotated land within settlement limits will be permitted, subject to compliance with Policy GDP1”

On this basis, there is a policy presumption in favour of developing land within settlement limits, provided that Policy GDP1 can be complied with. As previously outlined, the proposal accords with the relevant themes of GDP1 and therefore accords with the policies within the UDP, insofar as they are relevant, given that the plan no longer makes provision for housing sites, as it is out of date.

- 5.9 Policy H7 with the Wrexham UDP requires sites of 25 or more dwellings to provide affordable housing. Local Planning Guidance Note 28 issued by Wrexham CBC provides a cascade of options i.e. onsite provision, offsite provision and then commuted sums. Glyndwr University recognise the need for affordable housing. This proposal is brought forward on the basis that:

- (a) Wrexham CBC does not have a housing land supply and
- (b) the proposal represents sustainable development, which in the absence of a housing land supply engages the presumption in favour of granting planning permission,

Accordingly, this proposal seeks to provide 25% of the units as affordable dwellings onsite, so to address the housing needs of Wrexham CBC.

- 5.10 On that basis 19.25 of the 77 units are to be affordable. Local Planning Guidance Note 28 gives guidance on how to deal with fractions of dwellings and a potential commuted sum to cover the 0.25 of a unit.
- 5.11 It is Glyndwr University's intention to deliver 25% on each of the residential elements of Campus 2025. Local Planning Guidance Note 25 does provide details on viability and recognises that *"only where the viability of a development is genuinely threatened, will the affordable housing requirements be reduced"*. At this point in time, Glyndwr are not in a position to make an assessment of the viability of their Campus 2025 schemes, until they have a better understanding of any Section 106 requirements, which will be established through the Development Control process. Glyndwr University reserve the right to look at viability, although their ambition is to deliver policy compliant affordable housing on the subject site and all residential elements of the Campus 2025 package.

Local Planning Guidance Notes

- 5.12 In addition to the Wrexham UDP, a series of Local Planning Guidance Notes have been produced and approved by Wrexham CBC, which amplify development plan policy and are therefore material to the consideration and determination of the subject planning application. The key notes are as follows:
- Local Planning Guidance Note 30 covers design of residential developments. This is outlined further within the Design and Access Statement.
 - Local Planning Guidance Note 24 covers designing out crime. Whilst this is only an outline application, the parameters accord with the principles of this guidance.
 - Local Planning Guidance Note 7 deals with landscape and development. The DAS and landscaping proposals demonstrate compliance with this guidance.
 - Local Planning Guidance Note 21 deals with distances between dwellings and garden areas. The DAS looks at this guidance and demonstrates how the guidance can be delivered at reserved matters stage.
 - Local Planning Guidance Note 16 looks at car parking. The DAS looks at this guidance and demonstrates how the guidance can be delivered at reserved matters stage.
 - Local Planning Guidance Note 27 details how Wrexham CBC identify and secure contributions toward the improvement of education facilities within Wrexham. It is

envisaged that this issue will be dealt with via a subsequent planning obligation agreement.

Planning Policy Wales

- 5.13 National planning policy is set out within Planning Policy Wales (PPW). Its contents are not repeated in full in this Planning Statement. However, for the purposes of determining the subject application, there are a number of issues outlined below.

At 9.2.3, PPW confirms that

“Local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing judged against the general objectives and the scale and location of development provided for in the development plan. This means that sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live. There must be sufficient sites suitable for the full range of housing types. For land to be regarded as genuinely available it must be a site included in a Joint Housing Land Availability Study. The Welsh Government will monitor development plans and their implementation to ensure that sufficient housing land is brought forward for development in each local planning authority and that economic development and related job opportunities are not unreasonably constrained”

- 5.14 Because Wrexham CBC do not have a five year supply, then this triggers a set of policies which look at how to assess applications when the Authority does not have a five year housing land supply.

- 5.15 The key policy which is engaged is set out at paragraph 4.2.4 in that:

“A plan-led approach is the most effective way to secure sustainable growth through the planning system..... Where

- There is no adopted development plan or*
- Relevant development plan policies are considered outdated or superseded or*
- Where there are no relevant policies*

There is a presumption in favour (Narvo emphasis) of proposals in accordance with the key principles (see 4.3) and key objectives (see 4.4) of sustainable development in the planning system.”

5.16 This application is submitted on the basis that this policy is engaged. The UDP contains policies which ran up to 2011 and therefore the second bullet point is clearly relevant as the development plan policies are outdated.

5.17 The conclusion to this statement assesses the proposals in accordance with 4.3 and 4.4 as it is PPW (which supersedes the Wrexham UDP) which guides the decision maker to assess the application on this basis.

5.18 In terms of five year supply, then in addition to PPW, Technical Advice Note (TAN) 1 was published by the Welsh Government in January 2015. TAN 1 states in part 8 Transitional arrangements' that:

“8.2 Therefore local planning authorities that do not have either an adopted LDP or UDP will be unable to demonstrate whether or not they have a 5-year housing land supply and effectively will be considered not to have a 5-year supply. Those LPA’s without an adopted development plan will be unable to produce a JHLAS until an adopted LDP is in place. However, as mentioned in paragraph 3.3 above, local planning authorities without an adopted LDP should continue to carry out an objective assessment of their housing land supply on an annual basis in preparation for their LDP”

5.19 Against this background, the base data for assessing housing land supply is the latest Housing Land Monitoring Statement, which was issued by Wrexham CBC in April 2017. Within this document, it is acknowledged by Wrexham CBC that due to the absence of an up-to-date Unitary Development Plan and adopted Local Development Plan, in accordance with Welsh Government Guidance on Joint Housing Land Availability Studies (JHLAS TAN1 of Jan 2015), that the Authority does not have a housing land supply.

5.20 Part 6 of TAN1 goes on to guide the decision maker on how to deal with planning applications where there is not a five year housing land supply and states that:

“6.2 The housing land supply figure should also be treated as a material consideration in determining planning applications for housing. Where the current study shows a land supply below the 5-year requirement or where the local planning authority has been unable to undertake a study, the need to increase supply should be given considerable weight (Narvo emphasis) when dealing with planning applications provided that the development would otherwise comply with development plan and national planning policies.”

5.21 It is therefore clear that:

- There is a presumption in favour of proposals in accordance with the key principles (see 4.3) and key objectives (see 4.4) of sustainable development in the planning system.
- Where the current study shows a land supply below the 5-year requirement or where the local planning authority has been unable to undertake a study, the need to increase supply should be given considerable weight when dealing with planning applications provided that the development would otherwise comply with development plan and national planning policies.

6 Delivery, Planning Obligations and Conditions

- 6.1 There are no known insurmountable technical or environmental constraints to bring the site forward for development. The application scheme is a sustainable form of development. The design and form of the proposal generally accords with the relevant development plan policies and those of other material documents.
- 6.2 There is a willing landowner to bring the site forward for development in an expedient manner. The site is owned freehold by Glyndwr University. If outline planning permission is granted for residential development of the site, then the land will be sold, most likely to a regional / national housebuilder. The proceeds from any such sale would then be utilised by Glyndwr University for the redevelopment of facilities on the Plas Coch Campus, as part of the overall Campus 2025 Project.
- 6.3 The current assumption is that, following outline planning permission in Autumn 2018, the site would be sold and reserved matters submitted by a housing developer in Spring 2019. Following approval of reserved matters, a likely start date for construction on site would be late 2019, with the first dwellings available for occupation in Spring 2020. The expectation is that housing would be complete no later than mid 2021 i.e. all of the units would be constructed within five years and therefore all contribute toward boosting Wrexham CBC's five-year housing land supply.
- 6.4 Accordingly, subject to securing reserved matters and other related approvals, the site is immediately available for development. This is an important issue because of the urgent need for additional dwellings to meet the shortfall in the supply of housing land within Wrexham CBC.

7 Benefits, Planning Balance and Conclusions

7.1 There is a national imperative to boost the supply of housing land. Wrexham CBC currently does not have a housing land supply, nor an up-to-date development plan. Paragraph 4.2.4 of Planning Policy Wales is clear that where:

- *“there is no adopted development plan*
- *Relevant development plan policies are considered outdated or superseded or*
- *Where there are no relevant policies*

There is a presumption in favour of proposals in accordance with the key principles (see 4.3) and key policy objectives (see 4.4) of sustainable development in the planning system”

7.2 It is on this basis that the application needs to be assessed i.e. there is a tilted balance in favour of granting planning permission which applies to the subject proposals, subject to the tests outlined in 4.3 and 4.4 of the policy. Both are assessed in the following matrices below:

Para 4.3 bullet Point	How the Subject Application Responds
Putting people, and their quality of life now and in the future, at the centre of decision-making	The quality of life for current and future residents of Wrexham
Engagement and involvement, ensuring that everyone has the chance to obtain information, see how decisions are made and take part in decision-making	The application will go through all statutory requirements relating to public consultation prior to submission which addresses this requirement., together with the development management and approval process.
Taking a long term perspective to safeguard the interests of future generations, whilst at the same time meeting needs of people today	With a zero housing-land supply, the imperative for Wrexham CBC is to approve sustainable applications now, so to enable private and affordable housing to be delivered to address the shortfall in supply.
Respect for environmental limits, so that resources are not irrecoverably depleted or the environment irreversibly damaged. This means, for example, mitigating climate change, protecting and enhancing biodiversity, minimising harmful emissions, and promoting sustainable use of natural resources	The site is within the urban area of Wrexham, thus development here is within the highest-order settlement within Wrexham’s CBC’s settlement hierarchy , giving greatest potential for walking and cycling to be maximised, due to the widest range of facilities and most public transport options including rail, walking, cycling and buses.
Tackling climate change by reducing the greenhouse gas emissions that cause climate change and ensuring that places are resilient to the consequences of climate change	ON the basis that new housing needs to be built within Wrexham CBC’s administrative area, then Holt Road provides a site with strong sustainability credentials, in an area with no risk of flooding, thus the application scores well in this regard.

Para 4.3 bullet Point	How the Subject Application Responds
Applying the precautionary principle. Cost-effective measures to prevent possibly serious environmental damage should not be postponed just because of scientific uncertainty about how serious the risk is	There is no significant environmental damage caused by the development proposals. No significant assets are being demolished, thus there is very little waste and the site scores well from this perspective.
Using scientific knowledge to aid decision-making, and trying to work out in advance what knowledge will be needed so that appropriate research can be undertaken	The application complies insofar as any residential development site can do with this policy.
While preventing pollution as far as possible, ensuring that the polluter pays for damage resulting from pollution. In general the Welsh Government will seek to ensure that costs are met by those whose actions incur them	The geo-environmental work which accompanies this planning application is clear that there is no pollution on the subject site.
Applying the proximity principle, especially in managing waste and pollution. This means solving problems locally rather than passing them on to other places or to future generations	The site does not result in any significant waste or pollution.
Taking account of the full range of costs and benefits over the lifetime of a development, including those which cannot be easily valued in money terms when making plans and decisions and taking account of timing, risks and uncertainties. This also includes recognition of the climate a development is likely to experience over its intended lifetime;	The proposal addresses the social cost of Wrexham having an insufficient housing land supply. Providing homes is a key requirement for Local and National Government and so weighs in favour of this proposal.
Working in collaboration with others to ensure that information and knowledge is shared to deliver outcomes with wider benefits.	The proposal will be subject to a full package of consultation, which addresses this requirement.

7.3 Given the above, the proposals demonstrate that they comply with the requirements of 4.3 of PPW.

7.4 PPW 4.4 also then contains a further set of sustainability objectives. Some of these are relevant to the determination of this application as follows:

- The site delivers housing growth within the settlement boundary, therefore avoiding any incursions into the countryside surrounding Wrexham and/or urban sprawl.
- The sustainability merits of the site means the proposed new homes would be ideally located to meet the housing need within Wrexham CBC, by providing a site within the settlement with the widest range of services and facilities within Wrexham CBC.
- The planning application facilitates sustainable development, which reduces the environmental impacts of buildings, mindful that this outline planning application is only one tool to deliver this objective alongside reserved matters and building regulations.

- The proposal does not place any ecosystems, ecology or natural resources at risk. The land is currently grass which is regularly mowed, which offers little to wildlife or ecology. The design of the scheme is capable of meeting national and local planning policy aspirations and best practice concerning high and good quality design.
- Overall, a sustainable form of development would be delivered.

On the basis of the above, there is a robust case to approve the proposals in accordance with 4.3 and 4.4 of PPW.

- 7.5 It is acknowledged that the landscape character of the site and informal sports use would change as a consequence of the proposed development. However, the land is not a formal sports pitch which is being lost and should not be assessed as such. The proposal to transfer 0.82 hectares (2.03 acres) of land to Wrexham CBC for sports use is a benefit to the proposals, as it rationalises the current informal arrangements. This would mean that the existing changing rooms and car parking can continue to be used and, for the first time, these facilities will be provided on land which is owned by Wrexham CBC, thus safeguarding and securing a sports facility in the future. If Glyndwr were to sell the land (mindful that the University needs to sell surplus assets to raise finance for the overall Campus 2025 project and this land has been identified as being surplus to requirements) then a new owner could erect a fence along the boundary and the existing changing rooms and car park would be located next to an area of land which is too small to accommodate a full-sized football pitch and so would not have a sustainable use from that point onwards.
- 7.6 As discussed previously, because Wrexham CBC do not have a housing land supply, then PPW states that the need to increase supply should be given considerable weight, when dealing with planning applications provided that the development would otherwise comply with development plan and national planning policies.
- 7.7 Against this context, no significant or demonstrable adverse impacts have been identified which outweigh the clear benefits of the proposed development. Accordingly, the PPW's presumption in favour of allowing sustainable development clearly applies to this outline application and outline planning permission should be granted subject to conditions and a Planning Obligation.