

Wrexham Local Development Plan 2013 - 2028

Preferred Strategy



FEBRUARY 2016

housing | open space | employment | community | transport | education



Chapter 6: Strategic Policies

6.1 Overview

Chapter 4 and 5 have provided an outline of the Councils Preferred Growth and Spatial Strategy for the Local Development Plan over the period 2013 – 2028. The key components of the LDP Preferred Strategy therefore comprise the:

- Provision for 11,715 new homes to deliver a requirement of 10,650;
- Provides opportunities to deliver 7500 new jobs in the County;
- Delivers in the region of 53ha of employment land; and
- Concentrates development in the following sustainable locations in accordance with the findings of the settlement hierarchy and SA:
 - The Primary Key Settlement of Wrexham Town and Wrexham Industrial Estate including Key Strategic Site release for housing and employment;
 - The Key Settlements of Acrefair / Cefn Mawr, Chirk, Coedopeth, Gresford / Marford, Gwersyllt and Rhosllanerchrugog;
 - The Local Service Centres of Bangor, Broughton, Brymbo, Glyn Ceiriog, Holt, Llay, Overton, Penley, Penycae, Rhostyllen, Rossett and Ruabon; and
 - Some Minor Villages namely Rhosrobin, Marchwiel, Bronnington, Southsea and Bradley
- Amends the boundary of the existing green wedge designation⁽¹⁰⁰⁾ around Wrexham Town to facilitate the delivery of Key Strategic Site allocations.

The Key Diagram below (figure 5) helps to demonstrate the Councils Preferred Strategy.

100 This is the same as the green barrier designation in the adopted Wrexham Unitary Development Plan. Further information about the stage 1 review can be found in the Strategic Green Wedge Review: Phase 1 (February 2016) <http://wrexhamldp.wrexham.gov.uk>

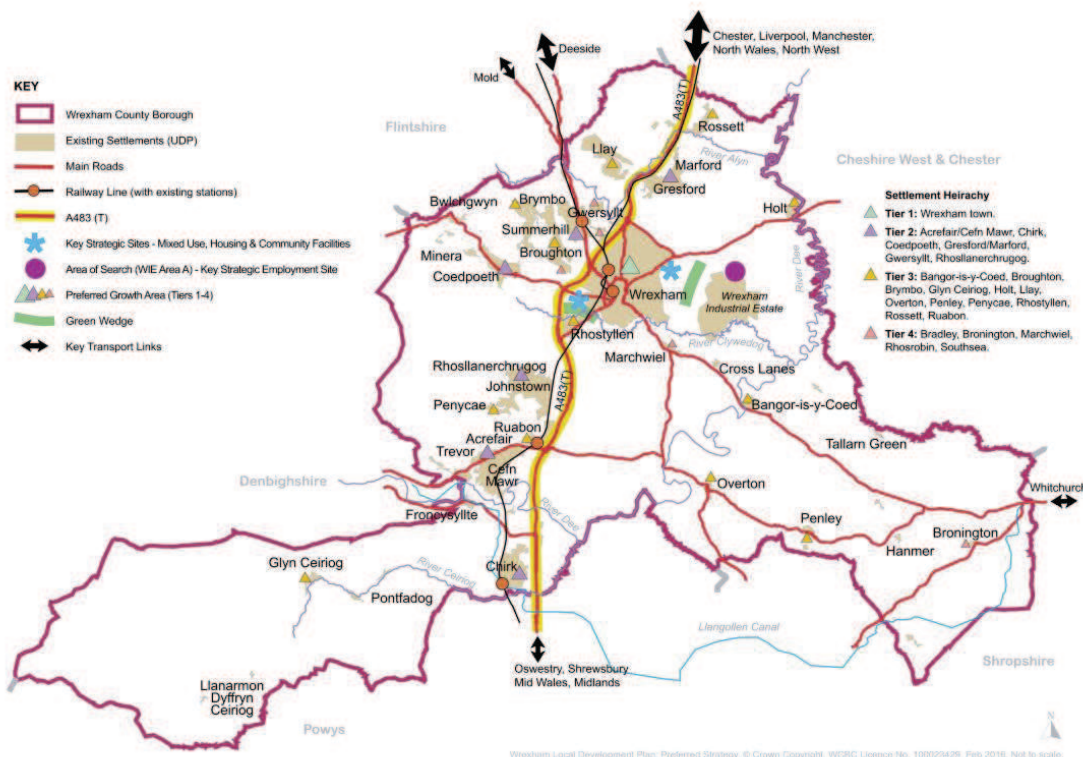


Figure 5: Key Diagram

The rest of this chapter includes the Strategic Policies which form the framework for implementing and delivering the Council's Preferred Strategy. Guidance⁽¹⁰¹⁾ suggests that the use of sustainable development themes such as those included in the Wales Spatial Plan (WSP) or other national or regional strategies could be used as a basis for setting out the policy approach in the LDP. The policies included in this chapter are grouped according to the Wellbeing goals in the Wellbeing of Future Generations (Wales) Act 2015⁽¹⁰²⁾, which places a duty on all public bodies to 'carry out sustainable development'. The Strategic policies are therefore grouped under the following themes:

- A prosperous Wrexham;
- A resilient Wrexham;
- A healthier Wrexham;
- A more equal Wrexham;
- A Wrexham of cohesive communities;
- A Wrexham of vibrant culture and thriving Welsh Language; and
- A globally responsible Wrexham.

It is inevitable that there will be a degree of overlap between the themes and policies; they need to be read in conjunction with one another in order to gain an understanding of the policy direction. Each section highlights the relevant strategic policy, the reason justification for the policy and also provides a link back to the relevant LDP objectives and evidence base. An outline of how the Deposit Plan will respond with further criteria or topic based policies where relevant is also included.

101 Paragraph 6.4.2.6 and 6.4.2.7, LDP Manual 2 (August 2015)

<http://gov.wales/docs/desh/publications/151007local-development-plan-manual-edition-2-en.pdf>

102 <http://gov.wales/docs/dsjlg/publications/150623-guide-to-the-fg-act-en.pdf>

6.2 Delivering Sustainable Development

The principle aim of the Councils Preferred Strategy is to contribute to sustainable development. In land use planning terms Sustainable Development principles are set out in chapter 4 of Planning Policy Wales (Edition 8, January 2016)⁽¹⁰³⁾. The strategy does not replicate the national policy position but it is expected that all new development, by complying with policies in the development plan, will contribute towards the achievement of sustainable development.

6.3 A Prosperous Wrexham

This section of the strategy relates to the economy, infrastructure delivery, transport and accessibility and Wrexham Town and Wrexham Town Centre.

Economic Growth Employment and Enterprise

The economy of Wrexham County Borough has been transformed over the past twenty years from one dominated by heavy and traditional industry into a major high tech, manufacturing, technology and services hub. Though a declining sector, manufacturing is still a major employer in the County Borough, providing nearly 20% of jobs. The highest proportion of jobs is within the Public Administration, Education and Health sector, at 35%⁽¹⁰⁴⁾.

The location of the County Borough means it is well placed to tap into the economic opportunities in both Wales and North West England. It also benefits from good connections to much of the UK through road and rail links and internationally, being within 45 mins drive from major airports in both Manchester and Liverpool and 90 minutes from Birmingham.

In Gross Value Added (GVA) terms, Wrexham has more than matched the UK average growth since 2005 and through the height of the recession, with a growth level of nearly 9% recorded over the 9 years to 2014, compared to an all Wales growth level of around 4.75% for the same period. The take up of employment land in the County Borough has averaged 3.9 hectares per annum over the last 10 years⁽¹⁰⁵⁾.

The current structure of employment premises is strongly industrial with existing supply largely focussed on the Wrexham Industrial Estate (WIE), the strategic employment area within the County Borough, which is recognised in the Wales Spatial Plan as a Key Business Sector Area⁽¹⁰⁶⁾. The WIE is the UK's second-largest industrial estate and among the largest in Europe. The remainder of the industrial estates in the County Borough are located around the A483 corridor to the west of Wrexham Town. Wrexham Town and the Technology Park are the main office market locations and the area also includes Glyndŵr University, Coleg Cambria and the Wrexham Maelor Hospital; key employers within the County Borough.

103 <http://gov.wales/docs/desh/publications/140731chapter-4-en.pdf>

104 Table 12, para.3.18, Joint Wrexham and Flintshire Employment Land Review, October 2015

<http://wrexhamldp.wrexham.gov.uk>

105 para. 9.77, Joint Wrexham and Flintshire Employment Land Review, October 2015

<http://wrexhamldp.wrexham.gov.uk>

106 Page 52, Wales Spatial Plan Update (2008)

<http://gov.wales/docs/desh/publications/130701wales-spatial-plan-2008-update-en.pdf>

Policy SP 1

Economic Growth, Employment and Enterprise

To ensure the continued role of Wrexham County Borough as a key economic driver in North Wales and the wider region, the Plan seeks to diversify the local economy and widen the economic base by:

- Making provision over the remaining plan period for 96 - 106ha of employment land, including identifying a Key Strategic Site, based on the preferred Area of Search for an extension of 20 -30ha at the Wrexham Industrial Estate - the County's Key Business Sector Area;
- Safeguarding existing high profile, strategic and locally important industrial sites essential to meeting the future economic growth of the County;
- Providing a level of growth which allows opportunities to deliver approximately 7500 jobs in the County Borough over the Plan period across a wide range of employment sectors;
- Ensuring there is sufficient land for high tech, high value and quality business development, which is accessible to public transport, the primary road network and employment markets;
- Improving the quality of employment land supply within Wrexham Industrial Estate and protecting a strategic ecological network for a number of local, national and internationally protected species and habitats;
- Provide local employment opportunities in key service centres;
- Targeting growth sectors and ensuring the availability of a range of sites;
- Supporting and encouraging the creation of a sustainable and diverse rural economy;
- Maintain and enhance the County Borough's tourism, culture and leisure offer taking into account of the unique character, local distinctiveness and heritage of the area and its context in the wider sub region;
- Support initiatives and accessibility to further higher education facilities in the County Borough, improving skills and links to main employers; and
- Support the delivery of high speed broadband infrastructure across the Borough, and provision of adequate telecommunications.

One of the principal objectives of the LDP is to 'Support a vibrant, diverse and competitive local economy that provides a range of job opportunities to enable new and existing businesses to grow in Wrexham'. It is essential therefore that the County Borough has an adequate employment land supply to accommodate the projected growth while allowing choice and flexibility to meet the varying nature of future employment needs and demands.

This is emphasised in the Council's Economic Prosperity Strategy (2012-2017) which recognises the need for Council intervention to guide the development of the local economy and confirms the Council's commitment to securing enough of the right land or buildings to attract high quality employment opportunities in the most sustainable and accessible locations.

The Joint Employment Land Review (October 2015)⁽¹⁰⁷⁾ incorporated sector growth forecasts for the County Borough to 2030, based on the 2014 Local Econometric Forecasting Model undertaken by Cambridge Econometrics and the Institute of Employment Research. Based on this, the ELR estimated a growth level of some 7658 jobs over the LDP period with an employment land requirement of 30.09 hectares. The ELR also

107 <http://wrexhamldp.wrexham.gov.uk>

recommends the allocation of an additional 20-30 hectares (exclusive of any land required for ecological mitigation) at Wrexham Industrial Estate, taking the overall requirement to between 50.9 and 60.9 hectares.

The Preferred Strategy sets out an employment land requirement of some 53ha and an increase of some 7550 jobs over the plan period which is broadly compatible with the ELR findings.

The ELR identified an existing realistic land supply of 80.05 hectares at the study base date of 31 March 2014. The employment land supply is monitored by the Council on an annual basis and the updated 1st April 2015 supply figure is 76.2 hectares⁽¹⁰⁸⁾. With the recommended allocation of 20-30 hectares at the WIE, this therefore gives an overall employment land supply of 96.2 – 106.2 hectares for the remaining plan period. While it is acknowledged that this supply exceeds the 53ha necessary to accommodate the jobs growth estimate, the Council believes this oversupply is justified and necessary, for the following reasons:

- i. It allows for flexibility, competition and choice by ensuring a range of available sites suitable for different employment uses in varying locations throughout the County Borough;
- ii. It has regard to the findings of other employment land reviews undertaken which have generally found that the rate of actual land take up tends to run ahead of expected growth rate⁽¹⁰⁹⁾;
- iii. It provides flexibility to offset any unforeseen loss in the employment stock which might occur over the Plan period;
- iv. It includes a proposed extension to the WIE which is a major regional and national employment centre close to Wrexham town. There is a recognised continued strong demand for land and premises on the Estate (approx. 80% of the employment land take up in the Borough since 2006 has been on land at the WIE)⁽¹¹⁰⁾. The extension land requirement of 20-30 hectares is a net figure having regard to the need for additional land to be set aside for ecological mitigation, recognising that the WIE contains an important network of habitats, supporting a diverse range of wildlife including a number of protected species.

The Council also recognises that to support the level of growth proposed in the LDP access and infrastructure improvements will be necessary during the Plan period.

As traditional employment uses tend to generate lower land values than some other uses, e.g. housing or retail, there can be pressure for employment land to be lost to these uses, which can be difficult to replace. While some existing sites which may not have a reasonable prospect of being used for economic development can be de-allocated, the Deposit Plan will contain a policy to safeguard existing and identified future employment sites for employment use, including land at Wrexham Gateway and Wrexham Technology Park for high quality (B1) employment development.

In recognition of the contribution farm diversification and small scale tourism/business projects can make to the economy in rural areas, the LDP will also contain policies to support, in principle the re-use of buildings in rural areas, small scale rural tourism and business development, subject to specific criteria/ limitations.

The Deposit Plan will also include a number of development control policies to provide guidance on issues such as design, access, landscaping and parking in relation to new employment development and provision for continual monitoring of employment land take up.

108 <http://wrexhamldp.wrexham.gov.uk>

109 Para. 9.6 of ELR October 2015, <http://wrexhamldp.wrexham.gov.uk>

110 Wrexham CBC Employment Land Availability & Monitoring (2015) <http://wrexhamldp.wrexham.gov.uk>

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Integrated Objectives	SO1, SO2, SO3, SO4, SO10
Evidence Base	• Joint Wrexham and Flintshire Employment Land Review (March 2015); • Topic Paper: Employment (February 2016);
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• Policy to protect existing employment areas within the County Borough; • Criteria based policy to support employment opportunities in the Deposit Plan including within rural areas; • Policy to protect the strategic ecological network on the WIE • SPG – Wrexham Industrial Estate and protected species

Question 5

Policy SP1

Do you agree with Policy SP1?

Infrastructure Delivery

The term infrastructure is broadly used for planning purposes to define all requirements that are needed to make places function efficiently, effectively and in a way that creates sustainable communities.

It should be recognised that the delivery of the full range of infrastructure needs of existing and new communities is dependent on partnership working between a variety of public and private sector agencies. Throughout the preparation of the Local Development Plan to date, discussions have taken place with key infrastructure delivery partners and will continue throughout the Local Development Plan process.

Policy SP 2

Infrastructure Priorities and Developer Contributions

Wrexham County Borough Council will continue to work with infrastructure suppliers and other partners to provide essential infrastructure required for the delivery of the Local Development Plan policies and allocations.

New development within the County Borough will be expected to provide for the following key infrastructure priorities:

- Educational facilities;
- Highway network and public transport improvements;
- Public Open Space and Green Infrastructure;
- Community facilities;
- Affordable Housing;
- Surface Water management; and
- Ecological mitigation.

The Community Infrastructure Levy (CIL) Regulations, 2010 came into force on the 6th April 2010. The CIL is a development tax, payable on a 'pounds per m²' basis on all new qualifying development with a Gross Internal Area (GIA) over 100 m².

The CIL does not directly replace the need for Section 106 contributions, but the use of these obligations after 6th April 2015 has been scaled back and will only be used to deliver the site specific infrastructure needed to make a development acceptable. This could be, for example, to deliver on site affordable housing or a traffic calming scheme pertinent to that particular development. All other infrastructure, as will be identified in a separate Regulation 1, 2, 3 list will be funded through CIL contributions once the LDP is adopted.

Initial evidence⁽¹¹¹⁾ suggests that there are varying levels of viability across the County but that there is evidence to suggest that a CIL charging schedule could be developed for retail and residential development in the more viable areas of the County Borough.

In Wrexham, the greatest infrastructure needs of the County relate to the provision of both primary and secondary Education. However funding is also required for other social, economic and environmental infrastructure including road improvements to release the economic potential of phase 3 of the Western Gateway Employment site and the mixed use Key Strategic Site of Lower Berse Farm. Other infrastructure including community facilities, open space and green networks, ecological mitigation and surface water management measures will also be required. The detail of specific infrastructure required for each individual allocation, including the Key Strategic Sites, will be contained in a separate infrastructure background paper at Deposit Plan stage which will be put together as part of the evidence base to support both the LDP and the separate, future CIL Charging Schedule (CS). Work on the Wrexham County Borough CIL will commence following the adoption of the Local Development Plan.

The provision of affordable housing or financial contributions towards it cannot currently be secured through CIL.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

111 Joint Wrexham and Flintshire Affordable Housing and Community Infrastructure Levy Viability Assessment (November 2014) <http://wrexhamldp.wrexham.gov.uk>

Integrated LDP Objectives	All
Evidence Base	• Joint Wrexham and Flintshire Affordable Housing and Community Infrastructure Levy Viability Assessment (November 2014) • Draft Wrexham Strategic Road Capacity and Improvement Study (February 2016);
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	Topic Based policies relating to specific infrastructure priorities set out in Policy SP2. SPG: Infrastructure Delivery

Question 6

Policy SP2

Do you agree with Policy SP2?

Wrexham Town and Wrexham Town Centre

The Preferred Strategy places significant emphasis on Wrexham Town and defines it as the Primary Key Settlement within the County Borough. Wrexham Town has a critical role to play in the success of the region, acts as an important service and employment centre for surrounding settlements including the rural hinterland and is the principal area where the majority of new growth over the Plan period will be directed.

The Preferred Strategy also recognises the importance of Wrexham Town Centre in delivering the vision and objectives of the LDP particularly in relation to meeting peoples housing, employment and health and wellbeing needs. The strategy supports regeneration opportunities in Wrexham Town Centre in order to provide an enhanced retail and leisure offer and improved environmental quality.

Policy SP 3

Wrexham Town and Wrexham Town Centre

Wrexham Town and Wrexham Town Centre is the principal growth and regeneration area within the County Borough. Over the lifetime of the Plan, directing development in these areas for future housing, employment, commercial, retail, leisure, tourism, services and the arts will be supported in order to regenerate the Town Centre and surrounding Communities First areas.

Supported by the Draft Wrexham Town Centre Masterplan, Wrexham Town and Wrexham Town Centre will be:

- A place to shop; building on its strong sub-regional position as a major shopping destination, diversifying the offer and developing complementary leisure, cultural and arts attractions to help develop the night time economy and improve the vitality and viability of the area;
- A place to visit; promoting the tourism, heritage and culture of the area;
- A Place to Live; with a wide variety and choice of new homes attractive to a diverse range of people with supporting social and economic infrastructure, including live work units within the Town Centre;
- A Place to Work; supporting the work of the colleges, education establishments, civic and retail functions;
- Attractive and Distinctive; developing an environment with an emphasis on high quality design in buildings, streets and spaces including the public realm and areas of greenspace; maximising opportunities to increase green infrastructure within the Town Centre and wider town area;
- An Accessible Town; ensuring high quality access for all to and through the town centre by a range of modes, prioritising active travel and public transport.

Wrexham Town is the County Borough's principal settlement and by far the largest in terms of population, retail offer, civic functions, leisure provision and commercial services. It performs a sub-regional role as the largest centre in north east Wales, something which is recognised in the Wales Spatial Plan which identifies Wrexham Town as a Key Settlement of National Importance⁽¹¹²⁾.

In more recent years however, due to the wider retail and economic downturn and the impact this has had on development locally, the town centre is not perceived to be performing well. There are a number of vacant premises at ground and upper floor levels and recent developments have resulted in fragmenting the town centre. There is also a proliferation of discount stores, a limited night time economy and a need for a consistent approach to public realm and green infrastructure.

In 2013, the Council were successful in gaining in the region of £10.5m worth of regeneration funding via the Welsh Government Vibrant and Viable Places (VVP) scheme⁽¹¹³⁾. The funding is centred on Wrexham Town Centre and the communities first areas of Caia Park and Hightown. There are 9 projects underway as a result of the funding which all aim to improve the quality of life amongst the economically inactive population in these areas by focussing on physical and social regeneration. This will act as a catalyst which in turn will help to provide homes, jobs and skills, income and a reduction in poverty. One of the projects associated with this is the Draft Wrexham Town Centre Masterplan⁽¹¹⁴⁾.

112 Page 52, Wales Spatial Plan Update (2008)

<http://gov.wales/docs/desh/publications/130701wales-spatial-plan-2008-update-en.pdf>

113 http://www.wrexham.gov.uk/english/business/vibrant_viable_places/index.htm

114 http://www.wrexham.gov.uk/english/business/vibrant_viable_places/index.htm

which has vitality and viability at the heart of the vision to stimulate growth in demand for housing, employment, retail and leisure in the Town Centre; directly supporting the aims of WSP for Wrexham as a Key Settlement of National Importance. The benefits of the project are likely to be felt beyond the boundary of the town centre and Communities First areas.

The Draft Wrexham Town Centre Masterplan informs the above policy by setting a clear strategy and framework vision, objectives and actions for the Town Centre. Together with the evidence base it will help shape policies in the Deposit Plan.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies in the Deposit Plan including SPG's.

Integrated LDP Objectives	SO1, SO2, SO3, SO4, SO5, SO7, SO9
Evidence Base	• Wrexham Retail Assessment (July, 2014); • Draft Wrexham Town Centre Masterplan (July 2015) • Bodhyfryd Mini-Masterplan (BDP, 2015); • Wrexham Town Centre Building & Streetscape Analysis (WCBC, 2014); • Wrexham Town Centre Accessibility Study (Ryder Landscape Consulting, 2015); • Wrexham Town Centre Masterplan; Report of Findings from Stakeholder Workshops (Planning for Real: 2015); • Wrexham Town Centre Public Realm Study (AECOM, 2015); • Wrexham Transport Accessibility Study (Crowd Dynamics, December 2009) • Valuing Wrexham's Urban Forest (Forest Research, 2014); • Wrexham Urban Area Bus Frequency Map, (WCBC 2014)
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• Retail Hierarchy, District and Local Centres • Town Centre Boundary • Retail Needs • Criteria based policy for determining proposals on unallocated sites • Primary and secondary shopping locations to be shown on the proposals map. • Non-strategic town centre allocations including– Bridge Street and Bodhyfryd • Town Centre Regeneration • Adopted Masterplan SPG

Question 7

Policy SP3

Do you agree with Policy SP3?

Transport and Accessibility

The Preferred Strategy places significant emphasis on economic growth, accessibility and health. Transport underpins these key parts of the Strategy and is directly linked to the delivery of the Key Strategic Sites for mixed use housing and community facilities as well as an extension to the Wrexham Industrial Estate. The delivery of an effective strategy for transport is therefore of strategic importance within the County Borough.

Policy SP 4

Transport and Accessibility

In accordance with the priorities of the Joint Local Transport Plan, new development and associated transport infrastructure should:

- Enhance transport network resilience and take steps to adapt our transport networks to the effects of climate change;
- Deliver capacity and safety enhancements/pinch point improvements;
- Integrate with strategic public transport services;
- Improve access to jobs and employment, homes, services, healthcare and facilities by locating new development in close proximity to existing infrastructure by walking, cycling and public transport;
- Encourage sustainable, active travel across the County Borough and incorporate measures to improve the safety, physical accessibility and remove barriers to mobility particularly within Wrexham Town Centre;
- Provide adequate levels of car and cycle parking where required taking into consideration the location and accessibility of the site to existing public transport facilities and the type, mix and use of development proposed.

Opportunities to improve public transport including cycle, bus and rail facilities will be taken wherever possible through improved services and connections, interchange facilities and parking at railway stations, including the following:

- Access infrastructure improvements to all stations in Wrexham County Borough with priority at Gwersyllt and Ruabon Station;
- Provision of a potential transport hub north of Wrexham Town;

Improvements to the following transport network are required to deliver the policies and allocations within the development plan:

- Junction 4 of the A483 trunk road with the A525 at Ruthin Road, Wrexham in order to deliver phase 3 of the Western Gateway and the mixed use housing and community facilities Key Strategic Site allocation at Lower Berse Farm.

The level of housing and economic growth within the Plan will have significant impacts on the transport network that will require considered management and mitigation. The Preferred Strategy is mindful that growth will lead to an inevitable increase in trips but seeks mitigation by locating development, especially where it is likely to generate significant levels of movement, in locations supporting the transport hierarchy⁽¹¹⁵⁾. Strategic policies for location of new development (SP8), Key Strategic Sites (SP9), Economic Growth, Employment and Enterprise (SP1) and Wrexham Town and Wrexham Town Centre (SP3) have all been prepared with accessibility and the transport hierarchy at their core.

115 Chapter 8, Planning Policy Wales (Edition 8, January 2016), <http://gov.wales/docs/desh/publications/140731chapter-8-en.pdf>

The spatial strategy directs the majority of new development to Wrexham Town in accordance with the transport hierarchy; then to tiers 2-3 where the need to travel is reduced due to local provision of services accessible by walking/cycling and where good sustainable travel options (bus and rail) are available to Wrexham Town. To improve social and environmental sustainability⁽¹¹⁶⁾ a limited number of tier 4 villages are included in the spatial strategy due to their proximity and location close to Wrexham Town and due to their good public transport links. Limited, small scale development is permitted via infill, windfalls, affordable housing rural exceptions and rural development in accordance with TAN6 and TAN23 in those settlements in tiers 4 and 5.

The Joint Local Transport Plan (JLTP, 2015) identifies the A483 trunk road as being of local, regional and national importance. At its intersections with the County Road network, particularly at junctions 3, 4, 5 and 6 (to the western side of Wrexham Town) there are significant existing capacity constraints⁽¹¹⁷⁾. Inevitably growth, regardless of its location within the County Borough, is likely to exacerbate this issue unless a suitable solution, including significant funding from Welsh Government can be found over the lifetime of the Development Plan. This constraint poses a barrier to the delivery of the Key Strategic mixed use housing and community facilities site at Lower Berse Farm, phase 3 of the Western Gateway Business Park and Wrexham Town Centre regeneration – all of which are integral to the delivery of the future economic aspirations of the Authority. The Council will continue to work with partners in both the public and private sectors to deliver a suitable transport solution in this part of the County.

There are a number of priority schemes that may come forward during the Plan period, the Deposit Plan will seek to ensure that where these schemes have land take implications that they are supported in principle, and where deliverability during the Plan period can be demonstrated that land allocations are made if appropriate.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Objectives	SO1, SO2, SO3, SO4, SO5, SO6, SO8, SO9, SO10 & SO12
Evidence base	• Topic Paper: Transport (February 2016) • Joint Wrexham and Flintshire Affordable Housing and Community Infrastructure Levy Viability Assessment (November 2014) • Joint Local Transport Plan (2015) • Draft Sustainable Urban Mobility Plan (2015) • Active Travel (Wales) Act 2013 • Draft Wrexham Strategic Road Capacity and Improvement Study (February 2016) • Wrexham Town Centre Accessibility Study (Ryder Landscape Consulting, 2015); • Wrexham Transport Accessibility Study (Crowd Dynamics, December 2009) • Future of Rail in Wrexham (January 2015)
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• Sustainable transport for unallocated development • Traffic management policy for the identified primary road network, trunk roads and core network. • Potential policy for the protection of disused railway lines for future transport/recreation use.

116 Initial Sustainability Report, Preferred Strategy 2015 - <http://wrexhamldp.wrexham.gov.uk>

117 Draft Wrexham Strategic Road Capacity and Improvement Study (February 2016)
<http://wrexhamldp.wrexham.gov.uk>

- Further identification of priority network improvement;
- SPG: Transport to cover parking, set out any requirements for Transport Assessments in locally sensitive areas for developments that fall outside of the thresholds contained in PPW.

Question 8

Policy SP4

Do you agree with Policy SP4?

6.4 A Resilient Wrexham

This section of the strategy relates to the management of the natural environment particularly within the context of climate change. It also sets out the Councils approach to Green Wedge within the LDP.

Protecting, Conserving and Enhancing the Natural Environment

The County Borough's natural environment is of outstanding quality and beauty. The diversity of both statutory and non-statutory landscape, habitats, species and geological features, and their relationship with the urban area, contribute enormously to the County Borough's distinctive and attractive character. Much of the landscape of the County Borough is of outstanding visual amenity value, including the recently extended Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) which forms part of the wider landscape setting surrounding the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS) (Figure 3).

The County Borough includes areas of international and national statutory designations as well as areas of local wildlife importance which the Plan will identify, in order that they can be conserved and where possible enhanced. All of these identified areas play a role in adding to the habitats and species that characterise the County Borough. Whilst the economic importance of Wrexham Industrial Estate is recognised, it is also unique in that it contains a wide range of important habitats, including local wildlife sites, within a relatively small area. For example, the 'Oaks' wildlife site adjoining the south east boundary of the estate. Extending to approximately 22 hectares, this area supports a wide range of species such as Polecat, Barn Owl and the rare and threatened Grizzled Skipper butterfly, as well as rare plant species. In order to reflect this and provide further clarity and certainty to deliver employment opportunities on the Estate, an ecological network is proposed which will protect the habitats and species on the estate without stifling economic development.

As well as making the County a special place to live and visit, the natural environment contributes significantly to the quality of life and economy of the area. As one of the County's most valuable assets, all reasonable steps should be taken to ensure that development conserves and enhances the quality of natural heritage, whilst balancing the need to facilitate sustainable economic growth and provide sufficient housing. This approach allows for appropriate development in line with the principles of sustainability, which seek to balance environmental, economic and social needs.

As well as the preservation and enhancement of the natural environment, the Plan should seek to reduce the causes and adapt to the consequences of climate change. Chapter 5 outlines the sustainable settlement pattern which reflects the approach advocated in

Planning Policy Wales⁽¹¹⁸⁾. This approach seeks to minimise the causes of climate change. As well as reflecting sustainable development principles within the spatial strategy, national guidance identifies the need to undertake an assessment of the opportunities and potential for renewable energy in the area⁽¹¹⁹⁾. This work is ongoing and will be reflected in a topic based policy in the Deposit LDP (see section: A Globally Responsible Wrexham). Less quantifiable are the consequences of climate change, which could include more erratic, unpredictable and extreme weather patterns, resulting in major flooding. The Plan will ensure that new development is located away from areas of designated flood risk, and advocates a sustainable approach to the management of surface water, in accordance with national policy requirements⁽¹²⁰⁾.

Policy SP 5

Protecting, Conserving and Enhancing the Natural Environment

Development which protects conserves and enhances the following statutory and non-statutory natural environment features will be supported:

- Special Areas of Conservation, Special Protection Areas, RAMSAR sites and Sites of Special Scientific Interest;
- The Clwydian Range and Dee Valley Area of Outstanding Natural Beauty recognising the importance it has in contributing to the Outstanding Universal Value and setting of the Pontcysyllte Aqueduct and Canal World Heritage Site;
- Local Wildlife Sites including the strategic ecological network on Wrexham Industrial Estate and Regionally Important Geological Sites;
- Special Landscape Areas recognised for their outstanding local landscape character;
- natural landscape features such as trees, hedges and forests and the green networks between them which contribute to the quality and diversity of the natural environment and play an important role in mitigating the impact of climate change; and
- The quality of natural resources including water, air and soils

Development likely to have a significant effect on European Sites, either alone or in combination with other plans or projects, will be subject to an appropriate assessment. Such development will only be permitted where it is possible to ascertain no adverse effect on the integrity of such European Sites. Where development proposals impact on non-European sites, loss or damage to habitats, sites and features will only be permitted in exceptional overriding circumstances, mitigation and compensation measures will be required to ensure there is no net loss of environmental value.

The natural environment is one of Wrexham County Borough's greatest resources. However, increasing populations, the need to supply additional housing, provide employment sites, changing rural practices and economies, and climate change are all placing significant pressure on the County's natural environment. The policy approach recognises the potential conflict in accommodating growth and protecting natural assets and seeks to balance this conflict by identifying and protecting the designations and assets which are of most significance to the County Borough.

118 Planning Policy Wales Section 4.4 (Edition 8, January 2016) – Chapter 4 Planning for Sustainability <http://gov.wales/docs/desh/publications/140731chapter-4-en.pdf>

119 Planning Policy Wales (Edition 8, January 2016, Para 12.8.18) – Chapter 12 Infrastructure and Services

120 Planning Policy Wales (Edition 8, January 2016) – Chapter 13 Minimising and Managing Environmental Risks and Pollution <http://gov.wales/docs/desh/publications/140731chapter-13-en.pdf>

Protection, conservation and enhancement of the natural environment will allow for appropriate development in line with the principles of sustainability - to balance environmental, economic and social needs. Appropriate development will need to conserve and enhance valued countryside, landscapes, wildlife and significant geological sites, minimise harmful impacts on biodiversity and landscape character and identify and provide, where possible, mitigation and compensation for environmental losses.

The policy identifies those international, national and local designations which are identified as making an important contribution to the environmental quality of the County Borough. Development should seek to conserve and enhance those areas of designation. It is recognised that the Plan should have regard to the relative significance of international, national and local designations in considering the weight to be attached to nature conservation interests and should take care to avoid placing unnecessary constraints on development. Beyond this, the Deposit Plan will seek to support the development of an integrated network of high quality multi-functional Green Infrastructure both within the County Borough and wider sub region recognising the importance of such facilities to biodiversity, wellbeing, amenity, sustainability and climate change.

The Deposit Plan will also seek to promote accessibility to the countryside and green open space, developing and maintaining Green Infrastructure links with communities and urban areas; as well as recognising the importance of open space, sport and recreational areas to biodiversity, wellbeing and amenity. The Plan will also protect and enhance existing areas of open space as well as set out standards for the provision of new areas and facilities (see section: A Healthier Wrexham).

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Objectives	SO6, SO7, SO9, SO10
Evidence Base	• Natural Environment Topic Paper; • Strategic Green Wedge Review: Phase 1 (February 2016) • Special Landscape Area Review (ongoing); • Habitat Regulations Assessment (February 2016) ; • Sustainability Appraisal (February 2016) • That potential issues associated with disposal of wastewater are recognised and addressed during the development of the LDP
Topic / criteria based policies in the deposit Plan	• Criteria based natural environmental policies • Special Landscape Areas; • Strategic ecological network on Wrexham Industrial Estate; • Green Infrastructure • Managing Surface Water

Question 9

Policy SP5

Do you agree with Policy SP5?

Green Wedge

Wrexham County Borough currently has a Green Barrier⁽¹²¹⁾ designation in the existing Unitary Development Plan⁽¹²²⁾; the purpose of which is the same as the Green Wedge designation identified in PPW. As part of LDP preparation it has been necessary to undertake a review of those areas of land which surround Wrexham Town in order to determine areas of change (Key Strategic Sites) as part of the Preferred Strategy. The Preferred Strategy identifies Key Strategic Sites (KSS, policy SP9) which are fundamental to the delivery of the LDP Vision and Objectives. Those sites identified for mixed use housing and community facilities require amendments to the existing green wedge designation to allow them to come forward (see Figure 5: Key Diagram) in the LDP.

The Strategic Green Wedge Review (Stage 1)⁽¹²³⁾ sets out the methodology and approach taken to assessing the current designation, which will be expanded as part of the Deposit Plan to include the rest of the areas in the County which are currently covered by the designation.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Objectives	SO7, SO9
Evidence Base	• Natural Environment Topic Paper; • Strategic Green Wedge Review (Stage 1, February 2015); • Strategic Green Wedge Review (Stage 2) – to be completed for Deposit Plan;
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• Green Wedge defined on LDP proposals map; • Topic Based Green Wedge Policy

Question 10

Green Wedge

Do you agree with the proposed approach to the Green Wedge?

6.5 A Healthier Wrexham

This section of the strategy relates to promoting health and wellbeing and demonstrates how the Deposit Plan will address open space, allotments and leisure and recreation.

Promoting Health and Wellbeing

Health and wellbeing needs to be understood holistically, recognising that the issues are complex and cross cutting throughout the LDP and recognising that Planning is just one of many influencing but enabling factors.

121 This is the same as the green barrier designation in the adopted Wrexham Unitary Development Plan. Further information about the stage 1 review can be found in the Strategic Green Wedge Review: Stage 1 (February 2016) <http://wrexhamldp.wrexham.gov.uk>.

122 Wrexham Unitary Development Plan (1996 – 2011)
http://www.wrexham.gov.uk/english/planning_portal/plan_policy/wxm_udp.htm

123 Strategic Green Wedge Review (Stage 1), February 2016 – <http://wrexhamldp.wrexham.gov.uk>

While the policy below stands alone to promote health and wellbeing it is important to recognise that the Preferred Strategy has health and wellbeing as a thread running throughout the document. The Sustainability Appraisal (SA) ⁽¹²⁴⁾ is a key integration tool ensuring that the approach to growth, delivering housing, economy, accessibility, sites and transport all have important roles in supporting health and wellbeing. During consultation on the Preferred Strategy a Health Impact Assessment will be undertaken, the findings from which will inform the SA and subsequent appraisal of the Deposit Plan.

Policy SP 6

Promoting Health and Wellbeing

The Council and its partners will create and safeguard opportunities for safe, healthy, fulfilling and active lifestyles by;

- Working in partnership with health and social care providers to improve health and wellbeing across Wrexham County Borough and reduce inequalities;
- Ensuring that all new developments provide opportunities for healthy living and improve health and well-being through the encouragement of walking and cycling, high quality design, access to services, open space ,green infrastructure, sports facilities and opportunities for recreation;
- Supporting the improvement of education and skills training, access to job opportunities and encouraging lifelong learning to help reduce poverty;
- Protecting existing community infrastructure and ensuring the provision of a network of community facilities, providing essential public services together with private and voluntary sector facilities, to meet the needs of communities;
- Ensuring all development is designed to create a safe environment;
- Promoting communal growing spaces including allotments and garden plots within increasing access to healthy, affordable and locally produced food;
- Promote a sense of belonging, pride and local distinctiveness;
- Working to reduce social isolation, inequality and exclusion by promoting accessible design;
- Avoid development giving rise to significant adverse impacts on health and quality of life (e.g. noise, water or light pollution, road and injury hazards).

Health and well-being is central to the objectives of the Council, its partners and residents and is reflected in its prominence as an LDP and SA objective thereby ensuring that the impact of the LDP on health & wellbeing has been fully assessed to reduce any negative impacts and deliver opportunities to enhance health.

The Council and its partners will seek to meet the health and wellbeing needs of our residents by addressing the key determinants of health including deprivation, physical environment and encouraging active lifestyles. The Council will work to improve education and employment in deprived areas, and across the County Borough, improve accessibility to services and will also help deliver physical improvements to the neighbourhoods themselves. Access to greenspace, and opportunities for recreational exercise, have been shown to help improve mental health and wellbeing. The diverse needs of residents within the Borough (e.g. increasing proportion of older people) will require different approaches to health and wellbeing.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Integrated Objectives	SO2, SO3, SO4, SO5, SO6, SO7, SO8, SO9
Evidence Base	• Topic Paper: Health & Wellbeing (2015); • Health Impact Assessment (HIA, February 2016); • Initial Sustainability Appraisal Report (Preferred Strategy), 2015; • 129; HIA; A Practical Guide; Wales Health Impact Assessment Support Unit (2012).
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• Leisure and recreation facility protection and enhancement • Active travel promotion • SPG: Healthy eating and proximity to fast food

Question 11

Policy SP6

Do you agree with Policy SP6?

Open Space, Sport and Recreation

Open space is important for people's health and social and economic wellbeing, as well as contributing to the environmental quality of the County Borough. All playing fields and areas used for recreational play such as children's equipped play grounds and multi-use games areas are significant for recreational, social and amenity value.

The provision of public open space in association with new developments is important to ensure that the appropriate amount and type of open space is provided in the right place to enable recreational needs to be met locally. The Deposit Plan will identify, protect and enhance areas of open space used for sports and recreation. New developments which require open space provision will be expected to create new open spaces on-site in accordance with the Council's open space standards set out in the Open Space Audit and Assessment of Need once completed.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Objectives	SO4, SO6, SO8, SO9
Evidence base	• Topic Paper: Natural Environment (February 2016) • Open Space Audit and Assessment of Need (Ongoing)
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• Protection of existing open space • Provision of open space in new developments • Protection of existing sport facilities • SPG – Open Space

Question 12

Open Space, Sport and Recreation

Do you agree with the proposed approach to open space, sport and recreation?

Allotments and Food Growing

Allotments contribute towards sustainable communities, healthy living, biodiversity and help foster improved interaction between different social groups, as recognised by Planning Policy Wales and TAN 16: Sport, Recreation and Open Space (2009). The Council, alongside private groups, provide allotment gardens in the County Borough for use by the local population. There is increasing interest in allotment gardening both nationally and locally, it is important therefore that existing provision is protected for continued use as allotments, and that the terms of Section 23 of the 1908 Allotments Act as amended, which require Local Authorities to provide allotments where there is identified demand, are met.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Objectives	SO4, SO6, SO9 & SO12
Evidence base	Local need data including waiting lists
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• Topic based policy relating to the protection and provision of allotments and food growing spaces

Question 13

Allotments and Food Growing

Do you agree with the proposed approach to allotments and food growing?

6.6 A More Equal Wrexham

This section of the strategy relates to housing provision and addressing the housing needs of the population including the need to deliver market and affordable homes as well as providing accommodation for the gypsy and traveller community.

Housing Provision

The Preferred Strategy recognises that there is a limited supply of deliverable brownfield land within the County Borough. The population is projected to rise over the Plan period⁽¹²⁵⁾ and existing demand for housing, particularly affordable housing and family accommodation is high in some parts of the Borough. Furthermore parts of Caia Park and Hightown are among the most deprived in Wales⁽¹²⁶⁾ and regeneration initiatives will continue to be required to support such communities.

The strategy best meets the housing needs of the community by balancing sustainability, deliverability, viability and need while also providing infrastructure to support development and helping to deliver affordable housing. It supports the Wrexham Local Housing Strategy - Local New Housing Landscape (2013-2018) which focuses on three themes under a framework of developing sustainable communities:

- More housing more choice; (affordable housing, intermediate rental products, market housing, meeting the needs of older people, range of housing sizes and increase flexibility);
- Improving homes and communities; (improve housing quality standards, reduce fuel poverty, bring empty properties into use); and
- Better services to improve people's lives (helping vulnerable people, people with mobility issues, older people, and Gypsy & Travellers).

The Local Housing Market Assessment (March 2015)⁽¹²⁷⁾ has identified a need for 157 affordable units per annum for both social and intermediate rent tenures. The overall housing requirement will help deliver some of this need via the planning system and other delivery mechanisms, including Council initiatives such as the affordable housing project and bringing empty properties back into use, will help address any shortfall. The strategy makes provision for an element of affordable housing delivery to be provided via the planning system to partially meet the identified evidenced need.

125 Para 5.5, Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

126 <http://www.wrexhamlsb.org/wsp.htm>

127 Para 6.61 Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

Policy SP 7

Housing Provision

Provision is made for 11,715 new homes in order to deliver a requirement of 10,650 over the period 2013 – 2028.

In order to support mixed, balanced and sustainable communities, the Council will work with partners to ensure that all new residential development contributes to improving the balance of housing and meets the identified needs of the whole community. New development will be expected to:

- maximise the delivery of affordable housing where a need is identified, recognising the varying levels of development viability across the County Borough;
- contribute to redress any identified imbalance between market and affordable housing within local housing market areas;
- ensure the sustainable use of housing land, providing an efficient density of development compatible with local amenity;
- provide the required mix of housing unit types and tenures to meet the needs of the County Borough;
- make provision for specific housing needs such as student accommodation, homes for the elderly, supported accommodation, nursing, residential and extra care homes where a need is identified;
- improve the quality and suitability of the existing housing stock; and
- be of a high quality standard of design that creates sustainable, safe and inclusive communities.

Providing an appropriate supply of housing directly supports the priorities within Our Wrexham Plan, particularly ‘making Wrexham a place where people can live independently and are healthy and active’⁽¹²⁸⁾.

Key to sustaining the economic prosperity of the County Borough is ensuring that a continued supply of new homes is provided to meet the needs of an increasing population.

The Plan deviates above the 2011 based Welsh Government household projections and makes provision for 11,715 new homes in order to deliver a housing requirement of 10,650 units with a 10% flexibility allowance over the Plan period.

This deviation is justified on the basis of a robust assessment of housing requirements based on the following information which is explained further in Background Paper 1: Population and Household Projections with dwelling and employment impacts (February 2016):

- Welsh Government 2011 based Population and Household projections⁽¹²⁹⁾;
- Previous Joint Housing Land Availability Studies and an assessment of past completion rates⁽¹³⁰⁾;

128 Page 6 – 8, Our Wrexham Plan (2013 - 2024), Wrexham, Local Service Board
http://www.wrexhamlsb.org/assets/pdf/lrb_plan_2013-2024.pdf

129 <http://gov.wales/statistics-and-research/local-authority-population-projections/?lang=en> and
<http://gov.wales/statistics-and-research/household-projections/?lang=en>

130 <http://wrexhamldp.wrexham.gov.uk>

- Site availability⁽¹³¹⁾ and viability⁽¹³²⁾; and
- The aspirations of the Authority to continue to expand the economy within the wider regional context⁽¹³³⁾;

The housing position as of 1 April 2015 (Appendix 3) shows that there is already a number of committed new homes that have either been built, are under construction or have planning permission which contribute in part to meeting the requirement for 10,650 new homes up to 2028. There remains however a shortfall that needs to be provided for the remainder of the Plan period, a proportion of which will result in the need for greenfield sites on the edge of existing settlements to be allocated. The majority of the remaining allocations (approximately 6,740 new homes) are directed to Wrexham Town, the most sustainable settlement within the County Borough through the allocation of brownfield sites within settlements and via Key Strategic greenfield Sites for mixed use housing and community facilities. Further non-strategic sites will be identified through the Deposit Plan and an identification of the approximate level of potential allocations within each tier is identified in the reason justification for policy SP8: Location of New Development.

This policy takes account of the most up to date evidence of need from the Local Housing Market Needs Assessment LHMA (2014) which highlights that houses remain the most popular choice of most households, particularly detached and semi-detached properties, with three and four bedroom properties, and bungalows most popular overall⁽¹³⁴⁾. There is a high level of social rented/affordable housing stock in the County Borough with just over 1.4 of every 5 households renting from or in joint ownership either with the Council or some form of regulated housing provider⁽¹³⁵⁾.

The LHMA (2014) clearly suggests a need for smaller one to three bedroom properties for both under and over 65's with some three bed general needs (under 65s)⁽¹³⁶⁾. There is also a need to ensure a range of appropriate housing provision, adaptation and support for the area's older people⁽¹³⁷⁾ as it is recognised that the County Borough has an ageing population⁽¹³⁸⁾ which will lead to specific accommodation needs. The LHMA recommends that the range of housing options available to older people should be diversified, which has the potential to free-up larger family accommodation⁽¹³⁹⁾. These issues are also noted in both the local authority's Housing Strategy (2013 – 2018) and Older Person Housing Needs Study (2013)⁽¹⁴⁰⁾.

The Council must make sure that new infrastructure and community facilities are provided as part of new development were necessary. At the same time, it must make sure that any extra cost placed on developers does not render schemes to become unviable and ultimately, not delivered on the ground.

The Joint Wrexham and Flintshire Affordable Housing and Community Infrastructure Levy and Development Viability Assessment (November 2014)⁽¹⁴¹⁾ was prepared to assist in the setting of affordable housing targets and thresholds and identify the headroom for a potential CIL charge across the range of different use classes within the County Borough.

131 Sites Register (February 2016) – <http://wrexhamldp.wrexham.gov.uk>

132 Joint Wrexham and Flintshire Affordable Housing and Community Infrastructure Viability Assessment (November 2014) <http://wrexhamldp.wrexham.gov.uk>

133 Wales Spatial Plan (Update, 2008) <http://wrexhamldp.wrexham.gov.uk>

134 Paragraph 5.25, Wrexham Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

135 Paragraph 4.12 Wrexham Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

136 Paragraph 7.27, Wrexham Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

137 Para 6.45 Wrexham Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

138 Background Paper 1 : Population and Household projections with dwelling and employment impacts (March 2015) <http://wrexhamldp.wrexham.gov.uk>

139 Paragraph 4.67, Wrexham Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

140 Para 6.70 Wrexham Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

141 Joint Wrexham and Flintshire Affordable Housing and Community Infrastructure Levy and Development Viability Assessment (November 2014) <http://wrexhamldp.wrexham.gov.uk>

This information has informed the settlement hierarchy to give a broad, strategic indication of viability levels within settlements, which has a knock on effect on the ability of an area to deliver development and associated planning gain. The study also recognises that varying development density amongst a range of other factors can have an effect on viability.

Identifying appropriate levels of housing density will differ on a site by site basis and is dependent on a range of issues such as the topography, size and constraints associated with individual sites and also the surrounding site context. The policy does not set a specific density level in recognition of these issues but it is expected that site density is maximised in order to make the most efficient use of land and be reflective of local circumstances. Densities within existing settlement limits vary between 30 – 50 dwellings per hectare on average, with higher density development within Wrexham Town and Wrexham Town Centre. Higher density developments can assist in urban and rural regeneration by increasing possible population numbers to support communities, social facilities and public transport, as well as reducing greenfield land take.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Integrated Objectives	SO1, SO2, SO3, SO5 & SO9
Evidence Base	• Wrexham Local Housing Strategy - Local New Housing Landscape (2013-2018) • Older Persons Accommodation Needs Assessment (2013) • Local Housing Market Assessment (March 2015); • Joint Wrexham and Flintshire Affordable Housing and Community Infrastructure Levy Viability Assessment (November 2014); • Candidate Site Register (February 2016)
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• Non-strategic housing allocations in tiers 1, 2, 3, and 4; • Windfall development including small scale infill proposals; • Former Flexsys / Monsanto Site, regeneration policy; • Housing in the Countryside (infill, barn conversions, replacement dwellings and rural enterprise dwellings – TAN6); • Affordable Housing Rural Exceptions; • SPG: Affordable Housing • SPG: Development in the open countryside

Question 14

Policy SP7

Do you agree with Policy SP7?

Gypsy and Traveller Accommodation

The Council will work with its partners and neighbouring Authorities over the Plan period to ensure appropriate accommodation for Gypsies and Travellers is provided within the County Borough. In order to meet the duty identified in the Housing Act (Wales) 2014,⁽¹⁴²⁾

142 <http://www.legislation.gov.uk/anaw/2014/7/contents/enacted>

and contribute to the Local Housing Strategy⁽¹⁴³⁾ the Council undertook a Gypsy and Travellers Accommodation Needs Assessment (GTANA) in 2013⁽¹⁴⁴⁾. This was prior to the more recent Welsh Government Guidance⁽¹⁴⁵⁾ being published on how to undertake Gypsy and Traveller Accommodation Needs Assessments.

The 2013 study makes ten recommendations including that the Council identify suitable developable land and funding to provide 15 new socially rented pitches by 2018; work with the community to identify land for at least 6 private pitches by 2018; and also establish a stopping place in the County Borough for members of the community who are travelling to, or passing through before 2018.

Significant work has already been undertaken by the Council to identify sites to meet the social rented and stopping place needs of the community as identified in the 2013 GTANA. The Council are also considering a number of current planning applications which will address the need identified in the study for private pitches

In light of the revised WG guidance, the 2013 GTANA is currently in the process of being updated with a requirement⁽¹⁴⁶⁾ that the study be completed and submitted to Welsh Government by February 2016. Given the pressing need to ensure timely progress is being made in relation to the LDP, the Deposit Plan will identify sites which are suitable for meeting the socially rented need for the Gypsy and Traveller community, a stopping place as well as the inclusion of a criteria based policy to determine planning applications for any new sites. Should any planning applications for social rented sites or a stopping place be determined but not implemented prior to the Deposit Plan, the sites will be safeguarded for such use at Deposit stage.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Integrated Objectives	SO1, SO2, SO3, SO5 & SO9
Evidence Base	Gypsy and Traveller Accommodation Needs Assessments (2013) update ongoing.
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• Site allocations for social rented Gypsy and Traveller accommodation; • Site allocation for a stopping place; • Criteria based policy for any new sites covering issues such as design, layout, density, access, amenity, parking and open space provision

Question 15

Gypsy and Traveller Accommodation

Do you agree with the proposed approach to Gypsy and Traveller Accommodation?

143 https://www.wrexham.gov.uk/assets/pdfs/housing/documents/local_housing_strategy.pdf

144 <http://wrexhamldp.wrexham.gov.uk>

145 <http://wrexhamldp.wrexham.gov.uk>

146 <http://wrexhamldp.wrexham.gov.uk>

6.7 A Wrexham of Cohesive Communities

This section of the strategy indicates where housing and employment opportunities will be distributed throughout the County Borough and identifies the key strategic sites which are crucial to the delivery of the Plan. The policies are a reflection of the spatial strategy and housing requirement being promoted in the Preferred Strategy, and seek to provide the level of housing and employment needed whilst also creating attractive, viable, safe and well-connected communities.

Location of New Development

Ensuring the right level of growth, in the right locations is key to the delivery of sustainable development within the County Borough. The creation of attractive, viable, safe and well-connected communities is essential to ensuring that people feel a sense of belonging to their environment; be it in an urban or rural location.

An understanding of the nature of existing communities within the County Borough helps provide a basis for setting out the location of future development and any interventions required to help communities prosper. Based on sustainability principles⁽¹⁴⁷⁾ the settlement hierarchy identifies a framework for the location of new development based on an understanding of each settlements existing facilities and their capacity, infrastructure, employment opportunity, planning constraints, viability and opportunities for new development which has been informed by the sites assessment process⁽¹⁴⁸⁾.

Many of the detailed considerations for creating attractive, safe, viable and connected communities relates to the principles of high quality and sustainable design which is covered under the topic 'a Wrexham of Vibrant Culture and Thriving Welsh Language' below.

147 Chapter 4, Planning Policy Wales Section 4.4(Edition 8, January 2016)

<http://gov.wales/docs/desh/publications/140731chapter-4-en.pdf>

148 Background Paper 2: Settlement Hierarchy and Development Potential (February 2016), Sites Register (February 2016) and Background Paper 5:Site Assessment Methodology (February 2016) – <http://wrexhamldp.wrexham.gov.uk>

Policy SP 8

Location of New Development

Over the Plan period, development within the County Borough is directed to the following locations in order of priority in accordance with the sustainable Settlement Hierarchy:

1. Within the **Primary Key Settlement of Wrexham Town (Tier 1) and Wrexham Industrial Estate**. Key Strategic greenfield Site allocations for mixed use housing and community facilities along with other non strategic housing allocations are directed to Wrexham Town. An area of search for a new employment allocation of between 20-30 ha is also identified on Wrexham Industrial Estate;
2. Within the **Key Settlements (Tier 2)** of Acrefair / Cefn Mawr, Chirk, Coedopeth, Gresford / Marford, Gwersyllt and Rhosllanerchrugog ⁽¹⁴⁹⁾;
3. Within the **Local Service Centres (Tier 3)** of Bangor, Broughton, Brymbo, Glyn Ceiriog, Holt, Llay, Overton, Penley, Penycae, Rhosyllen, Rossett and Ruabon, and
4. **The Villages (Tier 4)** of Bradley, Bronington, Marchwiel, Rhosrobin and Southsea,

Development in the remaining Tier 4 settlements of: Bersham, Bwlchgwyn, Crosslanes, Dolywern / Llwynmawr, Froncysyllte, Garth, Hanmer, Llanarmon DC, Minera, Pentre Bychan, Pentre, Pontfadog, Tallarn Green, Tanyfron, Trevor; and the Tier 5 hamlets of: Bettisfield, Burton, Gwynfryn, Halton, Horesemans Green, New Brighton, Sydalit, Tregeiriog and Worthenbury will be limited to small scale infill and windfall development including proposals for affordable housing rural exception sites.

Background paper 2: Settlement Hierarchy and Development Potential (February 2016)⁽¹⁵⁰⁾ sets out the approach taken to identify the settlements included within the tiers of this policy. Based on sustainability principles and the need for development plans to secure sustainable settlement patterns⁽¹⁵¹⁾ which meet the needs of the economy, environment and health, this policy directs development to the most sustainable locations within the County Borough.

Directing the majority of new development within and on the edge of Wrexham Town and the Wrexham Industrial Estate will enable maximum use of existing infrastructure and services and allow homes, jobs and other facilities to be located in close proximity to each other. This will enable people to use active travel opportunities, reducing the need to travel by car and support existing public transport modes.

Further, non-strategic development is directed to lower tier settlements identified in Tier 2 and 3. In addition, some settlements in Tier 4 which are located in close proximity to Wrexham Town and which benefit from relatively good accessibility by public transport are also capable of potentially accommodating some new growth.

149 Development in Rhosllanerchrugog is subject to the Deposit LDP being able to identify, and agree with NRW, an approach to managing growth which would address conservation concerns in respect of the Johnstown Newt SAC to development

150 Background Paper 2: Settlement Hierarchy and Distribution Development Potential (February 2016) – <http://wrexhamldp.wrexham.gov.uk>

151 Paragraph 4.7.2-4.7.8, Chapter 4, Planning Policy Wales (Edition 8, January 2016) <http://gov.wales/docs/desh/publications/140731chapter-4-en.pdf>

In the more rural areas of the County (remaining tiers 4 and 5), development is limited to small scale infill and windfall development including proposals for affordable housing rural exceptions. The Deposit Plan will provide detailed policy wordings for these types of development.

The table (table 3) below provides a summary of the approximate potential levels of remaining allocations which the Plan needs to provide by settlement hierarchy tier only. Generally, sites which are capable of delivering 10 units or more will be allocated in the Deposit Plan, anything smaller which is potentially suitable for development will be classed as windfall development. The table below does not include potential windfall development neither does it capture the amount of development that has already taken place or that which has been granted planning permission and may be under construction within the first 2 years of the plan period (2013 – 2015). Information in relation to how development could potentially be delivered, along with an indication of what this may look like in the Deposit Plan is also included.

All development located outside of any defined settlement limit is classed as development in the open countryside and will be strictly controlled and limited to essential development required for farm or forestry workers, small scale infill, rural conversions and affordable housing rural exception sites. Consideration will be given in the Deposit Plan to the removal of settlement limits in the lower tier (4 and 5) settlements.

Settlement Hierarchy Tier	Settlement(s)	Approximate potential housing (rounded to nearest 10) and employment allocations	How development could potentially be delivered in each tier	What this <u>may</u> look like in the Deposit Plan?
Tier 1 – Primary Key Settlement	- Wrexham Town - Wrexham Industrial Estate	3770 in Wrexham Town only – no housing proposed on Wrexham Industrial Estate 20 -30 ha extension for employment purposes on Wrexham Industrial Estate	<u>Housing:</u> - Brownfield allocations; - Greenfield KSS mixed use housing and community facilities allocations; and - Windfall sites; <u>Employment:</u> - Protection of Wrexham Industrial Estate as the Strategic Employment site in the County Borough; Allocation of new Key Strategic Employment Area (20 -30 ha) on land identified within the Area of Search for an extension to Wrexham Industrial Estate (policy SP9)	<u>Housing:</u> - Sites capable of accommodating 10 or more units to be allocated and shown on the proposals map; - Extent of KSS allocations to be allocated and defined on proposals map with the settlement boundary of Wrexham Town amended to include the KSS's; - Small site less than 10 to contribute to overall housing requirement via windfall development – policy relating to windfall development required in deposit plan; <u>Employment:</u> - Policy protecting strategic status of Wrexham Industrial Estate; - Employment KSS to be allocated and defined on proposals map;
Tier 2 - Key Settlements	- Acrefair / Cefn Mawr - Chirk - Coedpoeth - Gresford / Marford - Gwersyllt - Rhoslanerchrugog	930	<u>Housing:</u> - Brownfield allocations; - Greenfield allocations; and - Windfall sites; <u>Employment:</u>	<u>Housing:</u> - Settlement limits may change in the Deposit Plan to include allocations (sites that can deliver 10 or more units) for new housing development in some of these areas; - Small site less than 10 to contribute to overall housing requirement via windfall

Settlement Hierarchy Tier	Settlement(s)	Approximate potential housing (rounded to nearest 10) and employment allocations	How development could potentially be delivered in each tier	What this <u>may</u> look like in the Deposit Plan?
			Protection of existing employment areas where appropriate;	development – policy relating to windfall development required in deposit plan; Regeneration policy required in relation to the former Flexsys / Monsanto site in Cefn Mawr; <u>Employment:</u> Policy protecting existing employment areas where appropriate with such areas defined on the proposals map.
Tier 3 – Local Service Centre	- Bangor - Broughton - Brymbo - Glyn Ceiriog - Holt - Llay - Overton - Penley - Penycae - Rhostyllen - Rossett - Ruabon	1230	<u>Housing:</u> - Brownfield allocations; - Greenfield allocations; and - Windfall sites; <u>Employment:</u> Protection of existing employment areas where appropriate	<u>Housing:</u> - Settlement limits may change in the Deposit Plan to include allocations (sites that can deliver 10 or more units) for new housing development in some of these areas; - Small sites less than 10 to contribute to overall housing requirement via windfall development – policy relating to windfall development required in deposit plan; <u>Employment:</u> Policy protecting existing employment areas where appropriate with such areas defined on the proposals map

Settlement Hierarchy Tier	Settlement(s)	Approximate potential housing (rounded to nearest 10) and employment allocations	How development could potentially be delivered in each tier	What this <u>may</u> look like in the Deposit Plan?
Tier 4 – Minor Village	- Bersham - Bradley* - Bronington* - Bwlchgwyn - Crosslanes - Ddywern/Lwynmawr - Froncysyllte - Garth - Anmer - Llanarmon DC - Marchwiel* - Minera - Pentre Bychan - Pentre - Pontfadog - Rhosrobin* - Southsea* - Tallarn Green - Tanyfron - Trevor	820 (152)	<u>Housing:</u> - Brownfield allocations; - Greenfield allocations; - Small scale windfall sites including infill; and - Affordable Housing Rural Exception sites <u>Employment:</u> Protection of existing employment areas where appropriate;	<u>Housing:</u> - Settlement limits may change in the Deposit Plan in those areas marked with an * to include allocations (sites that can deliver 10 or more units) for new housing development; - Small sites less than 10 in all the settlements in this tier could contribute to overall housing requirement via windfall, including small scale infill development – policy relating to windfall development required in deposit plan; - Affordable housing rural exceptions policy to cover minor villages in those settlements not marked with *; - Consideration may also be given to the removal of settlement limits for those settlements not covered by * <u>Employment:</u> Policy protecting existing employment areas where appropriate with such areas defined on the proposals map

152 Potential from tier 4 settlements that comply with the Preferred Strategy only (see Chapter 5 and SA: Initial Sustainability Report, Preferred Strategy 2015)

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Objectives	SO1, SO2, SO3, SO4, SO4, SO5, SO6, SO7, SO8, SO9, SO12
Evidence Base	• Background Paper 2: Settlement Hierarchy and Development Potential (February 2016); • Candidate Site Register (February 2016); • Background Paper 3: Key Strategic Sites (February 2016); • Background Paper 5: Site Assessment Methodology (February 2016); • Initial Sustainability Appraisal Report, Preferred Strategy (2015)
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• Non-strategic housing allocations in tiers 1, 2, 3, and 4; • Windfall development including small scale infill proposals; • Former Flexsys / Monsanto Site, regeneration policy; • Housing in the Countryside (infill, barn conversions, replacement dwellings and rural enterprise dwellings – TAN6); • Affordable Housing Rural Exceptions; • SPG: Affordable Housing; • SPG: Development in the open countryside; • Protection of any new or existing employment areas; • Key Strategic Site: Employment • SPG Development within the proximity to the Johnstown Newt SAC

Question 16

Policy SP8

Do you agree with policy SP8?

Policy SP 9

Key Strategic Sites and Area of Search

The majority of new growth in the County Borough will be delivered within the Primary Key Settlement of Wrexham Town and Wrexham Industrial Estate by the respective development of the following two Key Strategic Sites (KSS) and Area of Search as indicated on the Key Diagram:

Mixed Use Housing and Community Facilities: KSS1: Lower Berse Farm, Ruthin Road, Wrexham to accommodate the delivery of:

- approximately 1260 new homes including an element of affordable housing;
- education provision including but not limited to the potential for a new 420 place primary school;
- community facilities including but not limited to public open space;
- highway solutions to address known infrastructure capacity constraints at junction 4 of the A483(T) road with the A525;
- the retention of a green wedge in perpetuity between the southern boundary of the site and the settlement of Bersham;
- maintenance of the Bridleway separating the north and south parts of the site;
- high quality design reflective of and sensitive to the setting of the Grade II* Listed Lower Berse farm; and
- sustainable drainage solutions to manage surface water;

Mixed Use Housing and Community Facilities: KSS2: Land to the east of Cefn Road including land to the south of Holt Road and Bryn Estyn Lane, Wrexham to accommodate the delivery of:

- approximately 1500 new homes including an element of affordable housing;
- education provision including but not limited to the potential for a new 420 place primary school;
- community facilities including but not limited to public open space;
- retention of Ysgol Morgan Llwyd playing fields;
- highway solutions to address known infrastructure capacity constraints at the greyhound pub roundabout;
- retention of the Erlas Victorian Walled Garden;
- retention and enhancement of active travel opportunities between the site and Wrexham Industrial Estate; and
- sustainable drainage solutions to manage surface water

Employment: Area of Search, Land to the North of Bryn Lane, Wrexham Industrial Estate to accommodate the delivery of:

- 20-30ha of new employment land including securing safe and accessible means of access ;
- the provision of strategic ecological network linked to the existing Wrexham Industrial Estate; and
- sustainable drainage solutions to manage surface water.

The Council undertook a 'call for sites' process Between November 2012 and February 2013, inviting interested parties to submit potential development sites in the County for consideration for development. The assessment methodology undertaken to assess these

sites⁽¹⁵³⁾ (in conjunction with the Sustainability Appraisal and Strategic Environmental Assessment)⁽¹⁵⁴⁾ outlines the approach taken to sift out those deemed most appropriate for allocation in the emerging LDP.

Some of the sites submitted on the edge of Wrexham Town are of such a scale (capable of accommodating more than 500 new homes) that they warrant inclusion at this stage of Plan preparation as they are central to the delivery of the Council's Preferred Strategy. Given their scale, they are termed Key Strategic Sites (KSS). Two of which are residential led mixed use schemes which will deliver housing and associated community facilities. The third has been informed by the findings of the Joint Wrexham and Flintshire Employment Land Review⁽¹⁵⁵⁾ and the Wrexham Industrial Estate (WIE) Site Expansion Selection Paper (February 2016)⁽¹⁵⁶⁾ and is shown on the Key Diagram (Figure 5) as the preferred Area of search for a new extension on the WIE.

The proximity of Wrexham Town to Wrexham Industrial Estate and the relationship and interdependence of one on the other to provide homes and jobs in a sustainable and accessible location is a key development priority for the Council over the lifetime of the Plan.

Background Paper 3, Key Strategic Sites⁽¹⁵⁷⁾ provides further information about the KSS and the preferred area of Search. It is expected that prior to the submission of any Planning application on these sites that developers and other interested parties work with the Council and local community to bring forward a comprehensive masterplan incorporating all the elements outlined in the above policy. A map of each KSS proposal is shown in Appendix 5.

Question 17

Policy SP9

Do you agree with Policy SP9?

6.8 A Wrexham of Vibrant Culture and Thriving Welsh Language

This section of the strategy relates to the historic environment including elements which contribute to our sense of place and identity. It also sets out sustainable design principles which will apply to all new development in the County Borough and is closely linked to the theme of 'a Wrexham of Cohesive Communities'.

153 Candidate Site Assessment Methodology Paper (February 2016)<http://wrexhamldp.wrexham.gov.uk>

154 Initial Sustainability Appraisal Report (Preferred Strategy) Appendix F, 2015 – <http://wrexhamldp.wrexham.gov.uk>

155 Initial Sustainability Appraisal Report (Preferred Strategy) Appendix F, 2015 – <http://wrexhamldp.wrexham.gov.uk>

156 <http://wrexhamldp.wrexham.gov.uk>

157 <http://wrexhamldp.wrexham.gov.uk>

Conserving, Protecting and Enhancing the Historic Environment

The historic environment is central to the appearance, culture and character of Wrexham County Borough. It contributes to our sense of place and cultural identity; it enhances our quality of life, adds to local distinctiveness and is an important economic and social asset. It is vital that the historic environment is appreciated, protected, actively maintained and made accessible for the general wellbeing of present and future generations.

Wrexham has a rich, varied and high quality historic environment which is evidenced in the wealth of listed buildings, conservation areas, scheduled ancient monuments, historic parks, gardens and landscapes and the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS). The historic environment has key role to play in fulfilling the objectives of the LDP whether they form part of the key commercial and retail core with Wrexham Town Centre, contribute towards a growing tourist economy or add to the cultural and historical identity of the County Borough. The Council is keen to ensure that historic assets are protected from inappropriate development and the opportunity is taken, where possible, to enhance historic areas, buildings and landscapes.

Policy SP 10

Conserving, Protecting and Enhancing the Historic Environment

Proposals which conserve, protect and enhance the following County Borough's unique and significant cultural and heritage assets and, where appropriate their settings will be supported:

- Listed Buildings and in particular those on the Buildings at Risk Register;
- Conservation Areas;
- The Outstanding Universal Value of the Pontcysyllte Aqueduct and Canal World Heritage Site;
- Registered historic parks, gardens and landscapes; and
- Scheduled Ancient Monuments & archaeological remains.

In line with national legislation, policy and guidance, the Preferred Strategy sets out the Council's commitment to the protection and enhancement of the County Boroughs many and varied historical assets. These are an irreplaceable resource which must be protected, conserved, managed and enhanced. To secure the future of such assets, the Council will encourage the retention of their existing uses, considering favourably appropriate new uses that do not harm the assets significance.

There are however a number of these assets, both in public and private ownership which are in a state of disrepair. These are identified on the Councils Buildings at Risk (BAR) register. The register currently contains 84 buildings deemed to be 'at risk'⁽¹⁵⁸⁾ where continued partnership work is required with private individuals, organisations and the voluntary sector to ensure their return to a viable and appropriate state of repair with the overall aim of removing them from the register.

Depending on the circumstances, the Council may agree to the minimal level of enabling development in order to secure the building's future and any such proposals should be in line with the English Heritage document 'Enabling Development and the Conservation of Significant Places' (2008)⁽¹⁵⁹⁾.

158 http://www.wrexham.gov.uk/english/planning_portal/historic_environment/buildings_at_risk.htm

159 Enabling Development and the Conservation of Significant Places (English Heritage 2008)
<https://content.historicengland.org.uk/images-books/publications/enabling-development-and-the-conservation-of-significant-places/enablingwebv220080915124334.pdf/>

The historic environment can add value to regeneration proposals and attract businesses to the Borough, acting as a stimulus for local economic growth including tourism. The Borough's heritage also strengthens local distinctiveness and sense of place for residents and visitors. Protection and enhancement of historic assets of high social value and which can deliver economic benefits through tourism and regeneration will continue to be supported. The Townscape Heritage Initiative (THI) project in Cefn Mawr has been instrumental in attracting business and investment via heritage led regeneration and there are similar other areas of the County Borough where a similar approach would help achieve the vision and objectives of the LDP such as in Wrexham Town Centre and Brymbo. Policies in the Deposit Plan will outline the approach to be taken.

The on-going development of the Historic Environment (Wales) Bill may also lead to the refinement of this policy at Deposit Plan stage, particularly where any new statutory requirements and recommendations are enacted.

Integration with LDP Objectives, evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Objectives	SO2, SO3, SO7, SO9
Evidence Base	• Topic paper: Historic Environment; • Topic Paper : Natural Environment; • The Clwyd 'Register of Landscapes, Parks and Gardens of Special Interest in Wales' (1995). • Pontcysyllte Aqueduct and Canal World Heritage Site Management Plan • Enabling Development and the Conservation of Significant Places' (Historic England, 2008)
Topic / criteria based policies required in the deposit Plan including SPG's	• World Heritage Site - Protection of the Outstanding Universal Value, authenticity and integrity and siting of tourist facilities as well as supporting infrastructure; • Buildings at Risk – reduction, management, bring back into use and enabling development; • Development within Conservation Areas; • Alterations to unlisted buildings within Conservation Areas; • Alterations to shop-fronts in Conservation Areas; • Heritage Assets and Regeneration – Focused areas of Wrexham Town Centre, Cefn Mawr & Brymbo; • Archaeological remains • Conservation Area Character Assessments & Management Plans • Cefn Mawr and District: Understanding Urban Character

Question 18

Policy SP10

Do you agree with Policy SP10?

Welsh Language

The future wellbeing of the Welsh language and its contribution to Welsh cultural heritage is dependent on a variety of key factors such as education, demographic change and community activities and economic prosperity.

The strategic approach to the Welsh language is to encourage employment opportunities and new homes to help retain Welsh speakers in the locality. This is supported by strategic policies for infrastructure to ensure that essential facilities are provided or retained and that transport and accessibility are in place to ensure communities have access to job opportunities and education facilities: The protection of natural and heritage assets which have a cultural value along with design principles also help to retain and create a sense of identity.

Development can have both positive and negative effects on the Welsh language. The Welsh Language topic paper ⁽¹⁶⁰⁾ has identified communities which are more sensitive to development that may require further consideration in forming LDP policies, allocations and in managing planning applications at the Deposit plan stage.

The Sustainability Appraisal accompanying the Preferred Strategy ⁽¹⁶¹⁾ has been used as a tool to identify significant effects (positive and negative) on the Welsh language, particularly in Welsh language sensitive areas, with proposals to avoid or mitigate significant effects.

Broadly the Preferred Strategy provides a framework in which housing and employment growth and the spatial strategy can support Welsh language sensitive areas. Mitigation and development management policies will be required in the Deposit plan to identify and mitigate any harmful effects.

LDP Integrated Objectives	SO7
Evidence Base	Topic Paper: Welsh Language (February 2016)
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	- Policies in the Deposit plan to protect natural and heritage assets; provision and protection of infrastructure and community facilities; support employment opportunities in rural areas, protection for existing employment sites and provision of housing including windfall, affordable housing and housing in the countryside. - SPG Welsh Language - SPG Design

Question 19

Welsh Language

Do you agree with the proposed approach to the Welsh Language?

160 <http://wrexhamldp.wrexham.gov.uk>

161 <http://wrexhamldp.wrexham.gov.uk>

Sustainable Design Principles

The strategy recognises the contribution that the built environment makes to local distinctiveness and local character. The varied landscape and townscape make the County distinct and strengthen the cultural identity of Wrexham, and can in particular contribute significantly to the Welsh cultural identity including the Welsh Language. Additionally buildings and structures, through their materials, positioning, design, function and landscape setting can evoke strong feelings of identity, pride and culture for residents and visitors enhancing the sense of place and visual quality of Wrexham County Borough's towns and villages. The strategy provides a framework for retaining the areas distinctiveness, by maintaining and enhancing landscape and townscape character through conservation, enhancement and high quality, sustainable design.

To protect and enhance the built, natural and cultural environment new development will need to be of high quality design and appropriately located. The layout and detailed design of new development will be key to creating quality places, a sense of place and an inclusive, accessible and safe environment.

Good design can ensure the protection and enhancement of the local environment and local distinctiveness, help to mitigate against the effects of climate change, promote social inclusion, improve health and wellbeing and attract investment, business and visitors.

Policy SP 11

Sustainable Design Principles

Proposals which can demonstrate high quality, sustainable design will be supported; all new development should:

- Respect local character and amenity and achieve a sense of place through the appropriate mix, layout, design and orientation of new buildings including the public realm;
- Ensure connectivity of places and ease of movement and legibility, with priority for pedestrians and cyclists;
- Promote safe, inclusive and secure environments and access routes;
- Make the best use of high quality, sustainable materials;
- Mitigate and adapt to the predicted effects of climate change;
- Provide for the sustainable management of water and waste;
- Promote multifunctional and adaptable public spaces including provision for public art where appropriate;
- Incorporate and increase green infrastructure and opportunities for biodiversity in the design and layout of new buildings and spaces;
- Be sympathetic to heritage, environmental and landscape assets; and
- Incorporate on site energy efficiency measures and provide for renewable energy generation either on site or through carbon offsetting measures;

The policy approach reflects national planning policy, the objectives of good design and seeks to ensure the future wellbeing of residents within the County Borough. The strategic policy sets out the general design considerations that development proposals in Wrexham will be expected to meet in order to ensure that developments complement their surroundings, contribute towards local distinctiveness and provide desirable, attractive, inclusive and sustainable places in which to live, work and spend leisure time.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Objectives	SO3, SO4, SO5, SO6, SO7, SO8, SO9, SO10
Evidence Base	• Topic Paper: Transport (February 2016) • Topic Paper: Historic Environment (February 2016) • Topic Paper: Natural Environment (February 2016) • Topic Paper: Health and Wellbeing • Topic Paper: Wrexham Town Centre and Retail • Wrexham Town Centre Public Realm Study (AECOM;2015);
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	SPG: Design

Question 20

Policy SP11

Do you agree with policy SP11?

Area of Outstanding Natural Beauty (AONB)

The Clwydian Range and Dee Valley AONB includes parts of the Counties of Denbighshire, Flintshire and Wrexham. Within the County Borough the AONB covers Ruabon Mountain in the east, and the area surrounding the Pontcysyllte Aqueduct and Canal World Heritage Site and Chirk Castle, as well as part of the northern edge of the Ceiriog Valley. The areas within the County Borough were included when the AONB was extended in 2011. Due to the area extending across a number of local authorities a draft Management Plan (2014-2019) has been prepared which defines the areas special qualities and features, and sets out an agenda for managing change that will help bodies, including Wrexham CBC, to fulfil their statutory duties. The Deposit Plan will seek to reflect the draft Management Plan through the inclusion of a topic based policy which outlines the approach to the determination of applications for development affecting the AONB.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Objectives	SO7, SO9,
Evidence Base	• Topic Paper: Natural Environment (February 2016) • The Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) draft Management Plan for the AONB (2014 - 2019).
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• Topic based policy which outlines the approach to the determination of applications for development affecting the AONB.

Question 21**AONB****Do you agree with the proposed approach to the AONB?****Pontcysyllte Aqueduct and Canal and World Heritage Site**

Pontcysyllte Aqueduct and Canal World Heritage Site was inscribed onto the UNESCO World Heritage List on 27 June 2009. The site stretches for 11 miles; from Gledrid in Shropshire, through Wrexham where the canal is carried above the River Dee and spans the Vale of Llangollen by the Pontcysyllte Aqueduct, and continuing westwards into Denbighshire where the site terminates at the Horseshoe Falls.

The site contains a number of outstanding and internationally important features. The aqueduct and the eleven miles of canal centred upon it utilised a concentrated series of innovative engineering solutions to negotiate a challenging upland landscape and for two centuries it remained as the tallest navigable aqueduct in the world. The site is a spectacular example of canal engineering, an architectural masterpiece set in a dramatic landscape, exemplifying improvements in transport during the industrial revolution. It is of outstanding universal value (OUV). The aqueduct and canal, its immediate setting and key views to and from the site and its wider historic and social context (e.g. the immediate locality provided materials and engineering expertise) that underpin the justification for building the aqueduct and canal are critical to the interpretation of the site and in understanding the integrity and authenticity of the outstanding universal value.

There is a need to provide essential facilities to meet the needs of visitors to the site. Since the site lies largely within open countryside it is not always possible for these facilities to be located within developed areas and it is therefore recognised that limited development (such as car parking, toilets) in the open countryside will be necessary. Essential facilities must be sensitively located, landscaped and designed so as not to conflict with the reasons for designating the site. Bilingual signage and interpretation is also expected.

The aqueduct and canal and its immediate environs extend into Denbighshire and Shropshire and as such the WHS Management Plan makes recommendations on the production and formulation of joint policy and Supplementary Planning Guidance to ensure a consistent approach across the 11 mile site.⁽¹⁶²⁾ The existing joint Supplementary Planning Guidance (Local Planning Guidance Note 33 – Pontcysyllte Aqueduct and Canal World Heritage Site)⁽¹⁶³⁾ has been prepared to reflect this requirement and is likely to be carried forward in its current form for the Deposit Plan.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's.

LDP Objectives	SO2, SO7 & SO9
Evidence Base	• Historic Environment Topic Paper (February 2016) • Natural Environment Topic Paper (February 2016) ; • Pontcysyllte Aqueduct and Canal World Heritage Site Management Plan

162 Section 4, Pontcysyllte Aqueduct and Canal World Heritage Site Management Plan
https://www.wrexham.gov.uk/assets/pdfs/heritage/aqueduct/management_plan.pdf.

163 <http://www.wrexham.gov.uk/assets/pdfs/planning/lpg/guide33.pdf>

Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	Policies in the Deposit LDP will need to be consistent with those of neighbouring Authorities (Denbighshire and Shropshire) and seek to protect OUV, authenticity and integrity of the site as well as to ensure tourist facilities and infrastructure are appropriately sited.
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Question 22

World Heritage Site

Do you agree with the proposed approach to the World Heritage Site?

Tourism

Sustainable tourism development has been identified by Welsh Government⁽¹⁶⁴⁾, Wrexham County Borough Council and its partners⁽¹⁶⁵⁾ as being vital to economic prosperity. In 2014 the visitor economy was worth over £100m to the local economy, with 1.74m visitors supporting 1620 full time jobs with the general trend for the visitor economy showing signs of steady growth⁽¹⁶⁶⁾. Tourism can contribute to the social, economic and environmental objectives for the LDP and can help deliver the strategy for Economic growth, employment and enterprise (SP1), Wrexham Town and Wrexham Town Centre (SP3) and Promoting Health and Wellbeing (SP6).

A key role for the LDP will be to facilitate tourism land use actions and priorities from the Economic Prosperity Strategy 2012-2016, Destination Management Plan, WCBC (2012-2017), and the Draft Wrexham Town Centre Masterplan, WCBC (2015). Key priorities will be enhanced visitor facilities and infrastructure at the World Heritage Site; investment in the other key hubs of Erddig Hall and the combined hub of Chirk Castle, Chirk and The Ceiriog Valley; develop Wrexham as a visitor destination; facilitate enhanced range and quality of visitor accommodation; and develop a sense of place.

There are other tourism opportunities that may arise from the AONB, heritage assets, rural development and recreational development that may arise from disused land, parks, former railway lines, canals and rivers and cycle/walking routes.

The strategic policies for Transport and Accessibility (SP4), Protecting, Enhancing and Preserving the Natural Environment (SP5) and Historic Environment (SP12) will all help contribute to the promotion of tourism.

164 Planning Policy Wales Chapter 11 (Edition 8, January 2016)
<http://gov.wales/docs/desh/publications/140731chapter-11-en.pdf>; TAN6
<http://gov.wales/topics/planning/policy/tans/tan6/?lang=en> and TAN23
<http://gov.wales/topics/planning/policy/tans/tan-23/?lang=en>

165 Economic Prosperity Strategy, WCBC 2012-2016,
http://www.wrexham.gov.uk/english/council/documents/economic_development.htm Destination Management
Plan 2012-2017 <https://business.wales.gov.uk/dmwales/sites/dmwales/files/documents/wrexham-dm-plan.pdf>

166 Source: WCBC AED, 2015

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Objectives	SO1, SO2,SO3, SO4,SO6, SO7, SO9
Evidence Base	• Topic Papers: Employment, Historic Environment, Wrexham Town Centre and Retail (all February 2015); • Economic Prosperity Strategy 2012-2016; • Destination Management Plan 2012-2017 • Draft Wrexham Town Centre Masterplan 2015;
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• Criteria based policy to support tourism opportunities in the deposit Plan including within rural areas; • Criteria based policy to preserve, protect or enhance tourism, sport and leisure facilities; • Wrexham Town centre regeneration policies • Visitor accommodation criteria policies • Re-use of buildings in rural areas • Farm diversification policy

Question 23

Tourism

Do you agree with the proposed approach to tourism?

6.9 A Globally Responsible Wrexham

This section of the strategy relates to the sustainable management of resources including minerals and waste and also includes reference to renewable energy technology. It is closely linked with the theme of A More Resilient Wrexham within the context of climate change.

Minerals

The County Borough is underlain by a wealth of mineral resources of economic importance and has a number of active mineral sites which play an important role in contributing towards the regional need for mineral. However, the need to supply additional housing, provide employment sites, and provide other non-mineral development including infrastructure such as roads and community facilities can result in the sterilisation of mineral both directly and indirectly.

The strategy outlines the approach to be taken to the safeguarding of important mineral resources within the County Borough, including maintaining a sustainable supply of minerals over the plan period.

Policy SP 12

Minerals Supply and Safeguarding

Minerals will be sustainably managed through:

- a. The protection of minerals from unnecessary sterilisation by directing new development away from areas underlain by mineral of importance or where this is not possible, through the requirement to extract mineral prior to the non-mineral development; and
- b. Avoiding conflict between mineral working and sensitive development through the use of buffer zones; and
- c. Contributing towards meeting the regional need for aggregate minerals in collaboration with Flintshire County Council; and
- d. Supporting proposals for mineral extraction within the County Borough which contribute towards maintaining an adequate supply of minerals in sustainable locations including the delivery of high quality restoration and aftercare programmes which enhance and provide linkages with the natural environment.

Mineral can only be worked where it occurs. Conflicts between minerals and non-mineral development are inevitable given the distribution of mineral within the County Borough and the location of existing settlements of strategic importance. The LDP will play an important role in the safeguarding of mineral resources by ensuring that these changes are appropriate and seeking to minimise any loss and where feasible, ensure the prior extraction of mineral thereby contributing towards the sustainable supply of mineral.

Minerals Planning Policy Wales (MPPW) (2000) sets out the requirement for each Local Planning Authority to make an appropriate contribution in its development plan to meeting local, regional and UK needs for minerals. MPPW recognises that collaboration will be necessary and Minerals Technical Advice Note 1: Aggregates sets out the mechanism for identifying regional demand, through the production of a Regional Technical Statement (RTS). The North Wales RTS 1 was published in 2009 and has since been reviewed, with the North Wales RTS (NWRTS) 1st Review published in August 2014. The NWRTS 1st Review identifies a shortfall of 3.84 million tonnes of crushed rock in Wrexham, shared with Flintshire County Council.

Crushed rock production is currently largely met in North East Wales through limestone production in Flintshire. There are no active limestone quarries in Wrexham and the distribution of limestone in Wrexham largely coincides with the AONB. MPPW seeks to direct new mineral working away from the AONB, save in exceptional circumstances. The identified shortfall is relatively small and considered unlikely to support the development of a new limestone quarry. There are opportunities for meeting additional crushed rock need in Flintshire through extension to existing site/s outside the AONB and Wrexham Borough Council has agreed to pursue this in collaboration with Flintshire.

The level of need for non-aggregate minerals is not quantified. Proposals will be rigorously tested to ensure that there is a local, regional or national need for the mineral concerned and that the location is the most sustainable, taking into account the distribution of the mineral resource.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Objectives	SO9, SO11
Evidence Base	• North Wales Regional Technical Statement 1st Review (2014) • British Geological Society (BGS) Mineral Resource Map of Wales (2010) • BGS Safeguarding Map of Wales (2012) • BGS Aggregates Safeguarding Map of Wales (2012) report
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• identify when mineral extraction would be acceptable • ensure that regional requirements for aggregate can be met over the lifetime of the Plan; • Identify a buffer zone around all permitted mineral workings and include a detailed policy to direct sensitive development away from the buffer zone; • criteria against which proposals for mineral extraction will be assessed to minimise any environmental impacts; • setting out restoration requirements and acceptable after use

Question 24

Policy SP12

Do you agree with Policy SP12?

Sustainable Waste Management

Wrexham is in a transitional period with respect to waste management. Historic reliance on landfill has been recognised as unsustainable at the European, national and local level which has resulted in a move away from reliance on landfill towards increasing recycling and recovery. Waste reduction efforts and changes to production are also changing the volume and types of wastes that require management, which poses a significant challenge to forward planning. In order to address this, the LDP will need to be flexible enough to respond to these changing needs. Waste is an employment use and in many circumstances proposals for waste management can be accommodated on industrial estates. Whilst TAN 21 advises that it is unnecessary to quantify the amount of separate future provision likely to be needed for waste management it is considered beneficial to identify those locations which are likely to be suitable for waste management. This provides certainty for the industry.

Policy SP 13

Sustainable Waste Management

Wrexham will contribute towards the sustainable management of waste through:

- The provision of a range of sites suitable for the management of waste;
- Supporting proposals which move the management of waste up the waste hierarchy;
- Ensuring that sufficient disposal and recovery capacity is available, whilst avoiding overprovision of these facility types;
- Recognition that some waste types may need to be located outside development boundaries and allocated sites;
- Promoting co-location of heat producers and the development of heat networks.

Technical Advice Note (TAN) 21 requires Local Development Plans to ensure sufficient disposal and recovery capacity is available within a region whilst ensuring that there is not an overprovision of these facility types. TAN 21 advises that disposal capacity of 7 years within a region is sufficient and sets out a requirement for regional monitoring and the production of a Waste Planning Monitoring Report. However, no Waste Planning Monitoring Report has been published to date. Wrexham has two operational landfill sites: Hafod, which has significant void remaining and Pen y Bont, which is due to close imminently. An assessment of available void within the region indicates that sufficient disposal capacity is currently available within North Wales. However, this matter will be closely monitored through the LDP.

TAN 21 also requires LDPs to identify whether support for any local authority procurement programmes is necessary. Wrexham County Borough Council, in its capacity as a Waste Collection and Disposal Authority, has entered into a Private Finance Initiative (PFI) to procure a number of facilities to enable it to manage local authority collected waste sustainably. A network of sites has been developed, including a Mechanical Biological Treatment (MBT) facility on the Wrexham Industrial Estate to manage residual waste, and which can also manage some commercial and industrial wastes. The other North Wales Authorities are in the process of procuring residual waste treatment capacity and planning permission for the development of an Energy from Waste facility on the Deeside Industrial Estate has now been granted. At present, it is considered support for local authority procurement programmes is not currently necessary through the LDP.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Integrated Objectives	SO9, SO12
Evidence Base	• Waste data provided by Natural Resources Wales • Landfill planning permissions in North Wales • Recovery planning permissions in North Wales
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• allocate or include criteria based policy to enable sites to come forward in the future

Question 25**Policy SP13****Do you agree with Policy SP13?****Renewable Energy**

Climate Change and energy security are key priorities for both the UK and Welsh Governments prompting Wales to move towards a low carbon energy based economy. To assist this move the LDP needs to plan positively, identifying opportunities and potential for renewable energy to bring social, economic and environmental benefits while protecting against harmful impacts on international and national obligations (habitats, species, landscapes) and community amenity.

A key tool in delivering a positive framework for renewables is the Welsh Governments Renewable Energy toolkit Guidance⁽¹⁶⁷⁾. The toolkit with an evidence based methodology is designed to inform a number of policy options for consideration in the Deposit Plan. These options are; identify the opportunity for an area wide Renewable Energy Target; inform site allocations; identify suitable areas for stand-alone renewable energy development; identify opportunities for low carbon energy generation linked to strategic new build development sites and develop policy mechanisms to support District Heat Networks for strategic sites. The toolkit is being used by the Council and will form the evidence base in the form of the Renewable Energy Assessment (REA) which will underpin the approach contained in the Deposit Plan.

The REA will also consider low carbon forms of energy such as Combined Heat and Power and the potential policy implications these may have such as promoting low carbon development on strategic sites.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Integrated Objectives	SO9, SO10
Evidence Base	Renewable Energy Assessment (ongoing)
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	- Facilitating local authority wide scale renewable and low carbon energy developments; - Criteria for sub-local authority scale renewable and low carbon energy development

Question 26**Renewable Energy****Do you agree with the proposed approach to renewable energy?**

167 Planning for Renewable Energy and Low Carbon Energy – A Toolkit for Planners (September 2015)
<http://gov.wales/topics/planning/policy/guidanceandleaflets/toolkitforplanners/?lang=en>

