



**PLANNING APPLICATION FOR THE
DEMOLITION OF EXISTING FARM BUILDINGS,
UNDERGROUNDING OF A 415 VOLTS (LV)
OVERHEAD LINE AND THE CONSTRUCTION
OF 27 DWELLINGS WITH ASSOCIATED
INFRASTRUCTURE INCLUDING ROADS,
SERVICES AND AMENITIES ON LAND AT
WOODLANDS FARM, NORTH OF DODDS
LANE, GWERSYLLT, WREXHAM**

**WOODLANDS FARM HOUSING SCHEME –
PHASE 1**

PLANNING STATEMENT

July 2016



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FORWARD

This document is the Planning Statement for the proposed demolition of existing farm buildings, undergrounding of a 415 volt (lv) overhead line and construction of 27 dwellings with associated infrastructure including roads, services and amenities on land at Woodlands Farm, North of Dodds Lane, Gwersyllt, Wrexham.

The planning application comprises five parts, as follows:

- Planning Application Forms, Certificates and Notices
- Validation Statement
- Planning Statement with Appendices
- Planning Drawings
- Design and Access Statement

Pre-application engagement with planning officers representing the determining Local Planning Authority, Wrexham County Borough Council (WCBC), was undertaken to agree the scope of documents/assessments to be submitted in support of the application.

The applicant has reviewed the project against The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2016 ('the EIA Regs'). The application does not represent a Schedule 1 Project (mandatory EIA), and has therefore been considered against Schedule 2 of the EIA Regs to determine whether or not it should be accompanied by an EIA compliant Environmental Statement (ES). The development would be 'screened' against Paragraph 10(b) of Schedule 2 (*Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas*). The relevant threshold is that listed alongside the corresponding development description within Schedule 2. The relevant thresholds are development including more than 150 dwellinghouses or with a site area in excess of 5 hectares. The proposal relates to the construction of 27 houses on 1 hectare of land, accordingly, the development does not represent a Schedule 2 project and so EIA is not required.

Whilst a formal EIA is not required in support of the application, a number of environmental assessments / supporting documents have been provided as follows:

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- Transport Statement;
 - Arboricultural Survey;
 - Ecological Assessment;
 - Utilities Statement;
 - Sustainable Drainage Scheme (SuDS);
 - Geo-Environmental Assessment.

These are provided as appendices to the Planning Statement, a summary of which is contained within the Statement itself.

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Figure 1 – Site Location

Figure 2 – Proposed Development

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Appendix A – Transport Statement

Appendix B – Arboricultural Assessment

Appendix C – Ecological Assessment

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Planning Drawings

Drawing Reference	Drawing Title
1957-01-001	Statutory Plan
C861.002A	Topographic Survey
C861.055B	Proposed Site Layout
C681.110B	House Type 1 (4p2b) Plans and Elevations
C861.120B	House Type 2 (5p3b) Plans and Elevations
C861.130B	House Type 3 (4p3b) Plans and Elevations
C861.135	Clwyd House Type Plans and Elevations
C861.140	Hope House Type Plans and Elevations
C861.145	Pembroke House Type Plans and Elevations
C861.150	Tenby House Type Plans and Elevations

1.0 INTRODUCTION AND BACKGROUND

1.1 Introduction

- 1.1.1 This Planning Statement has been prepared in support of a planning application for the proposed demolition of existing farm buildings, undergrounding of a 415 volt (LV) overhead line and construction of 27 dwellings with associated infrastructure including roads, services and amenities on land at Woodlands Farm, North of Dodds Lane, Gwersyllt, Wrexham. Fifteen of the dwellings will be offered for private sale with the remaining twelve becoming social rented houses.

1.2 Background

- 1.2.1 Wales and West Housing Association (WWH) nominated a site, of which the current application site forms part, for allocation for housing development within the Wrexham County Borough Council (WCBC) Local Development Plan (LDP) 2013 – 2028 Preferred Strategy. The 4 hectare nominated site was submitted to the Council for consideration on 1st April 2016.
- 1.2.2 WWH has now appointed Axis to assemble a planning application, of which this Planning Statement forms part, for the first phase of a proposed housing development on land at Woodlands Farm. The Phase 1 application site, the location of which is identified on Figure 1, covers approximately 1 hectare of the wider 4 hectare nominated site.

1.3 The Applicant

- 1.3.1 The Applicant for the proposed development is Wales and West Housing Association and Castell Homes Ltd. Castell Homes Ltd is a division of Castell Venture which is part of the Wales and West Housing Group.
- 1.3.2 WWH is one of the largest housing associations in Wales. WWH's responsibility to stakeholders is not only substantial but wide ranging. WWH are a charitable, not for profit organisation operating within 12 local authorities across the Country managing over 9,000 properties and providing homes and services to more than 17,000 people. Complementing this core duty is an equally important responsibility for the welfare and wellbeing of all its residents and the communities that they are part of. WWH has a proven track record in the development and delivery of affordable housing solutions to meet an identified need.

1.4 The Proposal

1.4.1 The Applicant is seeking planning permission for Phase 1 of a multiphase housing development, on land at Woodlands Farm, north of Dodds Lane, Gwersyllt, Wrexham. The application would deliver:

- the demolition of all existing buildings within the red line which consists of farm buildings associated with Woodlands Farm;
- the undergrounding of a 415 volt (LV) overhead line;
- the construction of 27 houses, 12 of which are to be social rented;
- creation of new public open space, including a children's play area;
- trees / landscaping;
- on site roads and other infrastructure;
- provision of new pedestrian links from the site to adjacent public footways;
- open space, including a children's play area; and
- an ecological mitigation area.

1.4.2 The house types would be as follows:

- 15 three bedroom private houses which would comprise 7 detached two story properties and 8 semi-detached two storey houses
- 6 three bedroom and 6 two bedroom social rented houses which would comprise 3 semi-detached two storey houses and 2 triple terrace two storey houses.

1.4.3 The proposal would incorporate areas of open space throughout the development, including a children's play area to the north west of the housing. There would also be a strip of land to the south east of the main housing development which would be safeguarded for nature conservation purposes. The layout of the proposed development and the location of the proposed nature conservation mitigation area is shown on Figure 2.

1.4.4 There is a section of 415 volt (LV) overhead line located along the site's southern boundary, along the footpath of Dodds Lane. In order to accommodate the proposed development, the aforementioned infrastructure will require undergrounding across the frontage of the site in order to construct the proposed site entrance. Whilst it is possible that these works could be undertaken under Permitted Development (PD) rights by a Statutory Undertaker, the works are being applied for as part of this planning application in the event that a third party undertake the works and so PD rights are not triggered.

1.4.5 Further details of the design and layout of the development is provided within the Design and Access Statement.

1.5 The Site and Surroundings

1.5.1 The application site covers an area of approximately 1 hectare and is located to the north of Dodds Lane, on the eastern periphery of Gwersyllt, within 500m of the village centre and approximately 2km to the north west of Wrexham Town Centre.

1.5.2 The site is currently in use for agricultural purposes and consists of a number of fields with trees located along its boundaries. The buildings of Woodlands farm (now derelict) are located on the site's southern boundary and are accessed from Dodds Lane. It is proposed that the farm buildings would be demolished as part of the scheme. The site is surrounded by agricultural land to the north and east with the land to the north forming the area for potential future phases of residential development. There are existing properties on the eastern edge of Gwersyllt which back onto the western boundary of the application site and are accessed off Pen-Y-Llyn. Dodds Lane is situated along the site's southern boundary, beyond which is the playing field associated with Gwersyllt PC School.

1.5.3 The site is in a sustainable location, with excellent access, within easy walking and cycling distance of a number of key service requirements, including, but not limited to; Gwersyllt Community Primary School (150m); Ysgol Bryn Alyne Secondary School (1km); Gwersyllt railway station (400m); Gwersyllt Parish Church (700m); and shopping facilities (200m). Employment providers are well provided for including, amongst others, Mold Road Industrial Estate (300m) and Rhosddu Industrial Estate (850m).

1.6 Planning History

- 1.6.1 As described above the site is currently occupied by agricultural fields and the derelict buildings of Woodlands Farm house and its associated farm buildings.
- 1.6.2 On the 22nd April 2014 planning permission was granted for the conversion of the existing agricultural buildings to form four residential units with associated parking and infrastructure subject to 19 planning conditions and a planning obligation. The permission reference is P/2013/0396.

1.7 Scope of the Planning Application

- 1.7.1 In addition to the application forms, certificates and drawings; a validation statement is submitted identifying the relevant national and local validation requirements that have been complied with by the application.
- 1.7.2 This Planning Statement is divided into five sections. Section 1 provides the introduction and background to the proposals. Section 2 provides an overview of the local need for additional housing and the role that the proposed development plays in meeting this need. Section 3 provide a summary of the more detailed assessments provided in support of the application which are deemed to be material planning considerations. Section 4 provides an assessment of the proposals against relevant national and local planning policies and, finally, Section 5 draws some concise conclusions to the Statement.

2.0 THE NEED FOR HOUSING

2.1 Introduction

- 2.1.1 Planning Policy Wales Edition 8 (Jan 2016) (PPW), which is supplemented by Technical Advice Notes (TANs) and circulars, is the national planning policy for Wales and sets out the land use policies of the Welsh Government. Locally, Wrexham Unitary Development Plan 1996-2011 (UDP) provides the statutory Development Plan for the application site. This section of the Planning Statement only addresses national and local planning policy concerning housing land supply and affordable housing provision. All other policies of relevance to the proposed development have been considered in Section 4.0 of this Statement.

2.2 Housing Land Supply

Overview

- 2.2.1 Paragraph 9.2.3 of PPW states that *“local planning authorities must **ensure that sufficient land is genuinely available or will become available to provide a 5 year supply of land for housing** judged against the general objectives and the scale and location of development provided for in the development plan.”*
- 2.2.2 A Joint Housing Land Availability Study (JHLAS) is the mechanism for local planning authorities to demonstrate that they have a 5-year housing land supply by providing an agreed statement of housing land availability for development planning and development management purposes. WCBC produced a JHLAS, dated 31st January 2015, which has been produced in accordance with TAN 1 ‘Joint Housing Land Availability Studies’ which provides guidance on the preparation of JHLASs. Such studies are undertaken jointly with:
- house-builders’ representatives;
 - infrastructure providers; and
 - other bodies such as local housing associations.
- 2.2.3 The Studies provide part of the evidence base for local planning authorities’ development plans and for their monitoring and review. The purpose of the Studies is to provide an agreed statement of housing land availability for development planning and development management purposes.
- 2.2.4 Section 8.0 of TAN1 sets out the position for local planning authorities that are in transition between UDP process and the LDP process. It states that local planning authorities may use their adopted UDP as the basis for calculating their housing land supply provided that the UDP is still within the plan period. This is not the case for WCBC. As such, and as stated in para 8.2 of TAN1 WCBC **is considered to not have a 5-year supply.**
- 2.2.5 Paragraph 6.2 of TAN 1 states that *“the housing land supply figure should also be treated as a material consideration in determining planning applications for housing. Where the current study shows a land supply below the 5-year requirement or where the local planning authority has been unable to undertake a study, the need to increase supply should be given **considerable weight** when*

dealing with planning applications provided that the development would otherwise comply with development plan and national planning policies.” [emphasis added].

WCBC’s Joint Housing Land Availability Study (JHLAS) (Jan 2015) and WCBC Housing Land Monitoring Statement (April 2015)

- 2.2.6 As outlined above WCBC does not have a 5-year land supply for housing and as such does not currently have an extant JHLAS. However, TAN1 does state local planning authorities without an adopted LDP should continue to carry out an objective assessment of their housing land supply on an annual basis in preparation for their LDP.
- 2.2.7 The most contemporary documents relating to housing land supply available on the WCBC website are the Joint Housing Land Availability Study (JHLAS) (Jan 2015) and WCBC Housing Land Monitoring Statement (April 2015).
- 2.2.8 The five year housing land supply calculation within the 2015 JHLAS comprises sites with planning permission (outline or full) and sites allocated for housing in adopted development plans, categorised as prescribed in TAN 1. This gives a total of 1304 units.
- 2.2.9 The average rate of historic annual housing completions over the previous 10 years period was then used to calculate the housing land supply figure in years. This provides a figure of 3.1 years, which is below the 5 years required by PPW.
- 2.2.10 The WCBC Housing Land Monitoring Statement (April 2015) updates some of the figures contained within the 2015 JHLAS in respect of housing land supply figures. The revised figures show that there is 5 year land supply of 1274 units. Based on the annual completions data contained within the 2015 JHLAS this would equate to 3.0 years of land supply, a reduction on the earlier figure.
- 2.2.11 It is recognised that at present there is no housing provision target in absence of an adopted LDP and as such the land supply estimates provided are not definitive. However, they give an indication of the level of deficit in housing land supply that currently exists within the authority area.

2.3 Affordable Housing Statement

- 2.3.1 Policy H7 of the UDP states that *“Where there is a proven lack of affordable housing to meet local needs, the Council will negotiate with developers to provide*

an element of affordable housing in new proposals of 25 or more homes. The initial benefit of discounted prices will be retained for subsequent and future occupants through the scheme's management by a suitable local housing body with the aid of legal agreements.”

2.3.2 The proposed development would provide 27 dwellings, 12 (44%) of which would be managed by WWH as social rented/affordable housing. The remaining 15 dwellings would be privately sold with profits being reinvested within WWH.

2.3.3 WCBC's Annual Improvement Report 2014-15 states that:

“During 2013-14...96 new affordable homes were completed – a substantial improvement on the 21 affordable homes completed in 2012-13. This meant that, for the first time in four years, the Council was able to meet its affordable housing target. Since 2013-14, the pace of construction has more or less been maintained. Although only 57 new affordable homes were completed in 2014-15, against a target of 96, a further 43 new homes were completed in early 2015-16, having been scheduled for completion in 2014-15, but delayed by unanticipated site issues. The Council's ambition for 390 new affordable homes by 2016 remains challenging, but it anticipates just over 200 affordable homes arising from developments already underway or scheduled to start during 2015-16, with the balance coming from sites at the pre-planning or pre-development stage.”

2.3.4 The 2015-2016 Annual Improvement Report does not provide an update on the above. However, a Local Housing Needs Assessment Evidence Base Report was produced by WCBC in March 2015 as an evidence base document for the emerging LDP. This document concludes that there is an annual shortfall of 157 affordable dwellings across Wrexham Borough Council. The analysis indicates a requirement for smaller one to three bed properties.

2.3.5 WCBC's Local Planning Guidance Note (LPG) 28 'Affordable Housing' explains that the Council will normally expect that 25% of the total site capacity to be provided as affordable housing. The affordable housing provision of 44% of the total houses to be provided within this first phase of the scheme is almost double that suggested within the LPG.

2.3.6 The proposed development would make a valuable contribution towards WCBC meeting its ambition for 390 new affordable homes by 2016 and represents more than half of the total affordable homes provided within the borough in 2012-13. The

development would also contribute to the assessed annual shortfall within the Local Housing Needs Assessment (March 2015) and would meet the identified house types required i.e. two and three bed properties.

2.4 Conclusion

- 2.4.1 The lack of a 5 year housing land supply in the WCBC area is a significant material consideration in the determination of this planning application and should be given considerable weight, in accordance with TAN 1. The proposal offers an opportunity to provide new housing in a sustainable location which would form a logical expansion of Gwersyllt. The proposal would provide a high proportion of affordable homes, easing the pressure on the social housing sector in the local area and assisting WCBC in meeting its affordable housing targets, as well as providing an additional 15 houses to be sold privately.

3.0 RELEVANT TECHNICAL MATTERS

3.1 Introduction

- 3.1.1 Pre-application engagement with WCBC was undertaken to agree the scope of documents/assessments to be submitted in support of the application. The conclusions of assessments into the matters of interest, as agreed with the officers of WCBC, are detailed within the following sections. The assessments cover the topics of traffic and transportation, arboriculture, ecology and nature conservation and SuDS design. Whilst not specifically requested WCBC a Geo Environmental Assessment and Utilities Assessment has also been undertaken. No other technical assessments were requested by WCBC to be included in support of the planning application.

3.2 Traffic and Transportation

- 3.2.1 A Transport Statement has been prepared to examine the traffic and transportation effects of the proposed development on the local highways network and is included as Appendix A to this Statement.
- 3.2.2 The proposed development would be derived from Dodds Lane via an upgraded site access junction. Dodds Lane serves as a local distributor route between the settlements of Rhosrobin, to the southeast, and Gwersyllt, to the northwest.
- 3.2.3 Historical traffic data for the area shows that prevailing traffic levels during the recorded peak hours illustrates a general tidal flow pattern with eastbound movement along Dodds Lane/Rhosrobin Road being more dominant during the AM period and westbound trips along this route being the peak demand during the PM peak. It is considered that this observed tidal flow reflects journey to work movements to/from the main centre of Wrexham to the south of the site.
- 3.2.4 Based upon a review of road traffic incident data, the nature of the local accident history is typical of such a local network which includes priority controlled junctions, and there are no material highway safety issues within the vicinity of the site.
- 3.2.5 The site represents a sustainable location for a residential development, being located within an acceptable walk/cycle catchment of key everyday destinations such as local shopping facilities and schools, and accessible by both bus and rail services to/from key local employment centres. These services are anticipated to reduce the need for residents at the site to utilise the car for everyday journeys.

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- 3.2.6 Analysis of trip generation from the proposed development demonstrates that the scheme is not anticipated to generate a substantive level of peak hour travel demand, with maximum two-way vehicle movements being just 14 vehicles per hour. Such levels of traffic are the equivalent of 1 vehicle movement every 4 minutes and are unlikely to result in any noticeable impact upon local network operating conditions.

3.3 Arboriculture

- 3.3.1 An assessment of the impacts of the proposed development upon the existing arboricultural resources at the site has been undertaken by JCA Ltd. and included as Appendix B to this Statement.
- 3.3.2 A tree survey was undertaken during July 2016 and all trees were inspected from ground level. Species surveyed include Hawthorn, Common Ash, Blackthorn, Wych Elm, Field Maple, Scots Pine, Lombardy Poplar, English Oak, Elder, Goat Willow, Holly, Leylandii and Apple.
- 3.3.3 The tree survey revealed a total of 18 items of vegetation (12 individual trees, 2 groups of trees and 4 hedgerows). Of these, 1 tree was identified as retention category 'A', 4 trees and 2 hedgerows were identified as retention category 'B' and 7 trees, 2 groups and 2 hedgerows were identified as retention category 'C'.
- 3.3.4 The location of each tree is plotted on the associated Tree Constraints Plan contained within Appendix B. This plan identifies the retention category of each tree (Retention A: green canopy, Retention B: blue canopy, Retention C: grey canopy, Retention U: red canopy), the crown spread, and also the associated rooting zone (Root Protection Area or RPA shown in gold). As a general rule, those trees listed as retention category 'A' or 'B' are the most valuable items and as such the removal of these is undesirable.
- 3.3.5 The proposed development would involve the removal of 12 trees, 2 groups of trees and 4 sections of hedgerow with 3 of the trees and 2 hedgerows being within Category B. None of the trees or hedgerows are located within Category A. Whilst the loss of these trees is regrettable, the proposal would involve extensive landscape planting which would involve the planting of a considerable number of trees, which would exceed the number of trees lost as a result of the development.

3.4 Ecology and Nature Conservation

- 3.4.1 An assessment of the impacts of the proposed development upon ecology and nature conservation has been undertaken by Avian Ecology Ltd and is included as Appendix C to this Statement.
- 3.4.2 This assessment presents baseline information on habitats and ecological features both within the site and the immediate surrounding area. The potential presence of protected species and habitats and sites of nature conservation interest is identified.
- 3.4.3 Great crested newts are known to be present within the surrounding area and habitats within the Site provide foraging opportunities as well as potential places that could be used for shelter and refuge. Habitat creation and compensation is proposed within the wider development area including a specific ecological mitigation area as shown on Figure 2. Habitat creation / management would aim to ensure that there will be no detriment to the conservation status of great crested newts in the local area. The proposed habitat and compensation area is adjacent to an area identified by Wrexham Borough Council as proposed newt mitigation site as part of the Great Crested Newt Master Plan (Fletcher & Wilkinson, 2013) and therefore will seek to compliment the wider conservation objective within the borough.
- 3.4.4 Buildings within the Site have potential to support roosting bats, although to date no roost have conformed. Validation surveys for bats (updating 2012 bat activity surveys) are currently in progress, and will be used to inform any required mitigation strategy. Data from the validation surveys will be submitted separately prior to determination of the planning application. Mitigation and compensation measures, as required, will be proposed in a manner proportionate to the scale of impact to deliver a 'like for like' strategy. This is considered to be achievable either within the Site or the wider development area, on land under control of the applicant.
- 3.4.5 Providing the implementation of mitigation, the potential for adverse impacts on protected and notable species or habitats is considered to be negligible.

3.5 Contaminated Land

- 3.5.1 A Geo-Environmental assessment has been undertaken on the proposed development area by REFA Consulting Engineers and is included as Appendix F to this Statement. The following paragraphs summarise the assessment.
- 3.5.2 An environmental and engineering desk study has been undertaken based upon existing reports, services location information, geological, hydrogeology and hydrological information, a commercially available database and old Ordnance Survey maps.
- 3.5.3 A walkover survey and intrusive ground investigation works have been undertaken to assess the presence, nature and extent of any soil and groundwater contamination at the site. A program of gas and groundwater monitoring has also been undertaken. This information has been used to identify any need for remedial action at the site.
- 3.5.4 The initial desk study of this site has identified a history of the site being in agricultural usage throughout the whole of its recorded history. The site contains an area of farmyard along with a ditch line along with areas of wetlands and a former fish pond and stone track situated within the north eastern corner.
- 3.5.5 The site investigation comprised 20 trial pits and 5 window sample holes. The sampling and laboratory testing of representative samples of soil from the investigative works has confirmed the absence of elevated levels of contaminants and as such no specific remediation is recommended in relation to soil or groundwater contamination.
- 3.5.6 The site is located within an area where full radon gas precautions are required to all properties and extensions to properties. Accordingly it will be necessary for suitable radon protection measures to be included within the proposed structures as recommended in BRE Publication BR22 Radon: "Guidance on Protective Measures for New Buildings".

3.6 Sustainable Drainage Assessment

- 3.6.1 A surface water drainage system has been designed by REFA Consulting Engineers. This has been informed by investigations at the Site examining the potential for soakaway into the underlying strata.

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- 3.6.2 A surface water drainage statement and associated drainage design is contained at Appendix E of the report. This details how a Sustainable Drainage System (SuDS) would be implemented as part of the development and as such the development accords with the requirements of TAN 15.

3.7 Utilities

- 3.7.1 The site is serviced by all the necessary utilities i.e. telecoms, electricity, gas and water. The Applicant has commissioned a utilities assessment for the site which demonstrates that there is sufficient capacity available from all of the utilities providers for the proposed scale of development. The Utilities Statement has been submitted in support of the planning application as Appendix D to this Statement.
- 3.7.2 Standard utilities connections would be required into the site. The only significant diversion required as a result of the development would be a 415 volt (LV) overhead line located in along the southern boundary of the site. It is proposed that this line would be buried underground as part of the development.
- 3.7.3 Two main foul water sewers cross the site, running in a north south direction. The proposed development has been designed to avoid impacting the sewers, including their associated easements.

4.0 PLANNING POLICY CONTEXT AND APPRAISAL

4.1 Introduction

4.1.1 This section undertakes an appraisal of the proposed housing development in the context of the current extant and emerging planning policy framework.

4.1.2 Following on from this introduction, the policy appraisal is divided into four principal sections. Section 4.2 provides a brief overview of the relevant policy context and identifies the principal documents to which further reference is made. Section 4.3 sets out the detailed policy framework against which this planning application should be considered and a detailed assessment of how the proposal accords or otherwise with that framework. Finally, Section 4.4 draws a number of concise conclusions.

4.2 Planning Policy Context

The Statutory Development Plan

4.2.1 Section 38(6) of the Planning and Compulsory Purchase Act (September 2004) and paragraph 3.1.2 of Planning Policy Wales (PPW) (Edition 8 - January 2016) requires that applications for planning permission should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

4.2.2 In the case of the proposed development the relevant statutory Development Plan comprises the Wrexham Unitary Development Plan 1996-2011, which was adopted on the 14th February 2005.

Material Considerations

4.2.3 There is no strict definition of what constitutes a ‘material consideration’ in planning legislation, although case law indicates that any consideration, which relates to the use or development of land is capable of being a material consideration in the determination of a planning application.

4.2.4 Material considerations can include national planning policy, emerging development plan policies and Supplementary Planning Documents (SPDs), as well as other land use and environmental factors which could influence the acceptability of development.

4.2.5 Paragraph 2.8.1 of PPW states that:

“the weight to be attached to an emerging LDP (or revision) when determining planning applications will in general depend on the stage it has reached, but does not simply increase as the plan progresses towards adoption. Policies can be amended or deleted from the plan at any stage up to the date of adoption. Thus in considering what weight to give to the specific policies in an emerging plan that apply to a particular proposal, local planning authorities will need to consider carefully the underlying evidence and background to the policies.”

4.2.6 It is anticipated that such material considerations will include (but not be limited to) the following:

The Emerging Development Plan

- Wrexham Local Development Plan 2013 – 2028 ‘Preferred Strategy’ (February 2016)

Other National, Regional and Local Planning Considerations

- Planning Policy Wales (PPW) Edition 8 (January 2016);
- TAN 1: Joint Housing Land Availability Studies (January 2015); and
- TAN 2: Planning and Affordable Housing (June 2006).

4.2.7 A further material planning consideration is the established ‘need’ for the development which is set out in Section 2.0 of this Statement.

4.3 Planning Policy Appraisal

The Statutory Development Plan - Wrexham Unitary Development Plan 1996-2011 (February 2005)

4.3.1 The Wrexham Unitary Development Plan (UDP) was adopted in February 2005. Its primary functions are to set out planning policies and to provide a basis for decisions on planning applications and to make proposals for development and the use of land.

4.3.2 Policies contained within the statutory Development Plan that are considered of particular relevance to the proposal are summarised below.

4.3.3 Strategic Policies PS1, PS2 and PS3 set out requirements for the location of new development in broad terms.

4.3.4 Policy PS1 states that *“new development for housing, employment, and community services will be directed to within defined settlement limits/employment areas*

Policy PS2 states that *“development must not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment.”*

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

4.3.5 Whilst the proposed site is not contained within a defined settlement limit, the development would form a logical and sustainable extension to the eastern extremity of the settlement of Gwersyllt. The policy discussion that prefixes policies PS1, PS2 and PS3 identifies that the strategy for the plan is to allocate housing development within and adjacent to existing built up areas, to make optimum use of previously developed or vacant land; to make use of spare capacity in infrastructure and services; and to focus on locations with reasonable public transport, walking and cycling links.

4.3.6 In this regard the proposed development meets these aims. A large proportion of the site is previously developed, and indeed is subject to an extant planning permission for residential housing. There is adequate infrastructure provision to serve the proposed housing and the site is very well located in terms of public transport, walking and cycling links.

4.3.7 In terms of its effect on the countryside, landscape/townscape character, open space, and the quality of the natural environment the development site is not considered to be particularly sensitive. Whilst not within the settlement limits the character of the site is heavily influenced by urban development and as such the scheme is not considered to result in material detriment to the local landscape.

4.3.8 Whilst the site is predominantly greenfield land, the land upon which the Woodlands Farm buildings are situated are brownfield and would be utilised by the

scheme. There are no available or suitable brownfield sites within the area and so the proposed development site offers the most suitable alternative. The site does not represent Best and Most Versatile agricultural land and is would not result in unacceptable impacts upon ecological receptors.

4.3.9 A strip of land to the south east of the main housing development would be safeguarded for use as a wildlife area. This would provide ecological mitigation, as outlined within the ecological assessment at Appendix C to this Statement. It is assumed that a suitably worded condition would be attached to any grant of planning permission for the proposed housing scheme requiring a habitat management plan to be submitted for the agreement of WCBC.

4.3.10 As noted above whilst there is a degree of conflict with Policy PS1 the development does meet the broad strategic aims for housing development set out within the UDP and furthermore any residual conflict is considered to be outweighed by the lack of a 5 year housing land supply within the WCBC area. The proposal is considered to comply with Policies PS2 and PS3.

4.3.11 There is also a degree of conflict with Policy H5 which seeks to place limitations on the development of dwellings outside defined settlement limits. However, set in the context of the broad strategic aims of provision of housing in sustainable and appropriate locations, the lack of 5 year housing land supply and the low sensitivity of the site in respect of countryside, landscape/townscape character and open space it is considered that proposed development does not frustrate the aims of the policy which are cited in paragraph 6.12 of the UDP as:

“6.12 This policy is designed to prevent new housing in the form of isolated dwellings, the consolidation of sporadic groups, or the extension of ribbon development in the countryside as it would result in a loss of visual quality and landscape character and adversely affect agriculture.”

4.3.12 Policy GDP1 ‘Development Objectives’ explains that all new development should:

- a) *“Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.*
- b) *Take account of personal and community safety and security in the design and layout of development and public / private spaces.*

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- d) *Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.*
 - e) *Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible.*
 - f) *Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air...and associated noise, odour or vibration arising from development.*
 - g) *Secure public services (e.g. gas, water, electricity) to development at minimum public cost.*
 - i) *Ensure that development does not result in, or is subject to, flooding...”*

4.3.13 The proposal has been designed to fit with the context of the site and other near-by housing developments. The range of family homes being provided will respond to the character of the setting and the needs of the local housing market.

4.3.14 Personal and community safety and security are important elements in the design of any new development. The proposal will improve the safety of the community by increasing the natural surveillance provided by new occupants and develop a greater sense of community in the local area. In respect of pedestrian and vehicular access this has been carefully considered in the design of the access onto Dodds Lane. A new pedestrian footway would be provided along the southern boundary of the site which links to the existing footways on Dodds Lane. The vehicular access has been designed to provide adequate driver visibility and the Transport Statement provided in support of the application demonstrates that there are no highways concerns with the development.

4.3.15 The site has been sustainably located in close proximity to a number of key service requirements, including, but not limited to; Gwersyllt Community Primary School (150m); Ysgol Bryn Alyne Secondary School (1km); Gwersyllt railway station (400m); Gwersyllt Parish Church (700m); and shopping facilities (200m). Employment providers are well provided for including, amongst others, Mold Road Industrial Estate (300m) and Rhosddu Industrial Estate (850m).

4.3.16 This Statement and its appendices demonstrate that the proposed development would not result in unacceptable impacts upon public amenity or the environment.

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- 4.3.17 A utilities assessment has been undertaken to provide a report defining potential cost and timescale risks involved in providing utilities connections that could impact on the overall delivery of the project. The principal aim of the assessment is to identify the key constraints derived from statutory utility infrastructure on the proposed development. The assessment does not identify any excessive costs or difficulties which would make the development of the site unfeasible. All services can be supplied to serve the new development without public cost. The Utilities Statement has been submitted in support of the planning application as Appendix D to this Statement.
- 4.3.18 The proposed development site is not located within an area at risk of flooding. Nevertheless, Appendix E to this Statement provides details of the sustainable drainage scheme (SuDS) for the site which complies with the requirements of TAN15 'Development and Flood Risk (2004)'.
- 4.3.19 The site is identified on the UDP Proposals Map as being located within the green barrier. Policy EC1 'Green barriers' is clear that *"development will only be granted planning permission if it is for agriculture, forestry, essential facilities for outdoor sport and recreation, cemeteries and other uses of land which maintain the openness of the Green barrier and do not conflict with the purpose of including land within it."* [emphasis added]
- 4.3.20 The LPA considered a proposal for residential development on a similar site (i.e. within the green barrier and outwith the settlement) at Boozey Field, off Griffiths Road, Old Mold Road, Gwersyllt. The Committee Report for the planning application concluded that the proposal did not represent inappropriate development within the green barrier for a number of reasons which also apply to the current proposal at Woodlands Farm. The Woodlands Farm scheme would form a logical extension to the village of Gwersyllt. The development of the site would not result in the coalescence of settlements and the function of the green barrier would remain even if this site is developed. Development of the site would not undermine the openness of the green barrier as it is well contained to the east by mature established trees and hedgerow and to the south by Dodds Lane. Allowing this site to come forward would result in the controlled expansion of an urban area and assist in safeguarding further areas of the countryside from encroachment. The proposal does not therefore conflict with Policy EC1 as it represents a use which maintains the openness of the green barrier which does not

conflict with the purpose of including the land within it. Further justification for the site's location with the green barrier is provided below.

- 4.3.21 Policy EC4 'Hedgerows, Trees and Woodland' explains that *"Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape. Development which results in the loss or significant damage to valuable trees, important hedgerows or ancient woodland sites will not be permitted."*
- 4.3.22 An Arboricultural and an Ecological Assessment have been undertaken and are included as Appendices B and C to this statement respectively. Both assessments conclude that the proposed development would not result in any unacceptable impacts on the environment.
- 4.3.23 Policy EC13 'Surface Water Run-off' states that *"development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted."*
- 4.3.24 Appendix E to this Statement contains details of the SuDS scheme which provides justification for the chosen surface water drainage solution based upon the geology of the site obtained from trial pit records. The scheme proposes the use of deep bore soakaways as traditional soakaways would not be possible in this location due to the impermeable nature of the underlying clays. The approach demonstrates accordance with Policy EC13 as there would be no unacceptable adverse impact upon the water environment through the introduction of additional surface water run-off.
- 4.3.25 Policy CLF5 'Open Space Requirements from new Residential Developments' requires the provision of open space on developments of over 10 residential units at a minimum level of 0.4 hectare per 50 dwellings. Based on the proposed 27 units therefore, a minimum provision of 2,160m² of open space is required. This area is provided by a combination of shared open spaces within the main development area and a specific open play area to the immediate north of the housing. This area would include a formal play space area which would contain children's play equipment. The proposal therefore meets the requirements set out within Policy CLF5.

Material Considerations

Wrexham Local Development Plan 2013 – 2028 ‘Preferred Strategy’ (February 2016)

- 4.3.26 Wrexham County Borough Council is in the process of preparing a new Local Development Plan (LDP) for the County Borough. The LDP is the Council’s land use plan that will establish where and how much new development will take place in the County Borough over the period 2013 – 2028. It will also identify which areas need to be protected from development and will replace the existing Unitary Development Plan (UDP, 1996-2011) once adopted (currently programmed for March 2018).
- 4.3.27 The Preferred Strategy is the first formal publication in the Local Development Plan (LDP) preparation process. It sets out the broad approach that the LDP intends to take in order to ensure that the County is developed in a sustainable manner. It provides the strategic framework for the more detailed policies, proposals and land use allocations which will subsequently be included in the Deposit LDP. The Preferred Strategy is non-strategic and does not contain site specific land allocations or detailed planning policies.
- 4.3.28 Whilst the plan is currently at an embryonic stage of development, the elements of the Preferred Strategy identified below are material considerations in the determination of the planning application.
- 4.3.29 The Councils Preferred Strategy has been developed in accordance with the objectives of Planning Policy Wales (PPW). A number of national compliant locational criteria have been used to influence the approach towards allocation of future housing sites in the Local Development Plan. This includes;
- availability of previously developed sites;
 - accessibility of sites to jobs, shops and other services;
 - the capacity of the existing and potential infrastructure;
 - the scope to build sustainable communities to support new infrastructure;
 - the physical and environmental constraints on land; and
 - the compatibility of housing with neighbouring land).

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- 4.3.30 The Strategy aims to establish a framework for housing growth, based on an analysis of a number of Strategic Growth Options. It sets out options for the strategic level of housing and options in relation to where this future development should take place (the spatial distribution). The Councils Preferred Option is the development of around 11,715 new homes to deliver a housing requirement of 10,650. The Councils own evidence base demonstrates that they have a limited supply of deliverable brownfield sites across the Borough and this is a diminishing resource, and accordingly.
- 4.3.31 *“...It will be necessary to bring forward greenfield sites on land adjoining existing settlements in the most sustainable locations to address the identified housing and employment land needs over the Plan period. This will be the case regardless of the level of growth.”* (Section 5.1 page 71).
- 4.3.32 The Strategy identifies a 5-tier hierarchical approach to the identification of sites for future housing allocations, albeit recognising the need for a broad distribution of sites throughout the County Borough. Gwersyllt is identified as a Tier 2 (Key Settlement) (Tier 1 being Wrexham Town), and accordingly a proposed site which goes towards meeting the locational criteria at a Tier 2 settlement should be supported.
- 4.3.33 The proposed site is located within the green barrier, the function of which is essentially the same as the Strategic green wedge, where it is desirable to maintain the openness of an area and ensure settlements do not coalesce. The Council undertook a review of the UDP green wedge around Wrexham designation as part of the LDP preparation (The Strategic Green Wedge Review – Stage 1) in order to determine areas of change required as a result of designation of Key Strategic Sites, and to address concerns expressed at the initial hearing session as to whether the assessment is in line with national policy.
- 4.3.34 The proposed site is within sub-area 4 (Land between Bradley, Rhosrobin and east of Gwersyllt) of the Stage 1 study. The Strategy Review recognises that the gaps between settlements are narrow, and that overall there is justification for the retention of the green wedge in this location. However it also recognises that;
- 4.3.35 *“...wider consideration must be given to the need to ensure that a sufficient range of development land is available which is suitably located in relation to the existing urban edge...Gwersyllt is identified as a Tier 2 settlement in the settlement*

hierarchy and is an appropriate location for development...it is recommended that the overall principle of retaining the green wedge in the area is appropriate; however amendments to the designation will be necessary should candidate site be deemed appropriate for inclusion at Deposit LDP stage.” (Stage 1 Review Page 42).

- 4.3.36 The proposed site represents a logical and sustainable expansion of Gwersyllt, helping to provide spatial balance against the existing housing to the west and south. It would deliver an attractive and highly sort after residential location encompassing the Council wide aim for a variety of mixed housing type.
- 4.3.37 There are no obvious constraints on the local infrastructure with the proposed site having direct access to the main adopted road network into Gwersyllt centre and Wrexham to the south. The site is in a sustainable location, and has excellent access, within walking and cycling distance of a number of key service requirements, as identified within earlier sections of this Statement.
- 4.3.38 Mindful of the fact that the LDP Preferred Strategy recognises the need to bring forward Greenfield sites, whilst the plan is yet to be adopted, the proposed site is demonstrably in accordance with the emerging LDP.

Planning Policy Wales (PPW) Edition 8 (January 2016) and Technical Advice Notes

- 4.3.39 Planning Policy Wales (PPW), which is supplemented by Technical Advice Notes (TANs) and circulars, is the national planning policy for Wales and sets out the land use policies of the Welsh Government. The policies of relevance to the proposed development have been considered in the subsequent section. PPW and the TANs are material to decisions on individual planning applications and, as such, it is important to consider how the proposed development fits within this policy context.
- 4.3.40 The housing land supply aspects within Chapter 9 of Planning Policy Wales are dealt with at Section 2.0 of this Statement. The following chapters of PPW are also considered relevant to the proposed development and are dealt with below:
- Planning for Sustainability (Chapter 4); and
 - Housing (Chapter 9);

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- 4.3.41 Paragraph 4.2.2 of PPW states that the planning system provides for a presumption in favour of sustainable development to ensure that social, economic and environmental issues are balanced and integrated, at the same time.
- 4.3.42 Section 4.3 sets out the key principles of sustainable development, which include:
- Putting people and their quality of life now and in the future, at the centre of decision making;
 - Engagement and involvement, ensuring that everyone has the chance to obtain information, see how decisions are made and take part in decision-making;
 - Taking a long term perspective to safeguard the interests of future generations, whilst at the same time meeting needs of people today;
 - Respecting environmental limits; and
 - Tackling climate change.
- 4.3.43 Section 4.4 provides the policy objectives of PPW which include:
- Promoting resource-efficient and climate change resilient settlement patterns that minimise land-take (and especially extensions to the area of impermeable surfaces) and urban sprawl, especially through preference for the re-use of suitable previously developed land and buildings, wherever possible avoiding development on greenfield sites;
 - Play an appropriate role to facilitate sustainable building standards and secure the provision of infrastructure to form the physical basis for sustainable communities;
 - Locate developments so as to minimise the demand for travel, especially by private car; and
 - Ensure that all local communities – both urban and rural – have sufficient good quality housing for their needs, including affordable housing for local needs and for special needs where appropriate, in safe neighbourhoods.
- 4.3.44 With regards to the site being located on a greenfield site, as previously noted, the proposal fits with WCBC's Preferred Strategy which identifies a need to *“bring forward greenfield sites on land adjoining existing settlements in the most*

sustainable locations to address the identified housing and employment land needs over the Plan period. This will be the case regardless of the level of growth.”

- 4.3.45 The site has been sustainably located in close proximity to a number of key service requirements, including, but not limited to; Gwersyllt Community Primary School (150m); Ysgol Bryn Alyne Secondary School (1km); Gwersyllt railway station (400m); Gwersyllt Parish Church (700m); and shopping facilities (200m). Employment providers are well provided for including, amongst others, Mold Road Industrial Estate (300m) and Rhosddu Industrial Estate (850m). Further information on the design of the proposed housing and access to amenities is provided within the Design and Access Statement.
- 4.3.46 Paragraph 4.8.1 of PPW states that: *“Around towns and cities there is often the need to protect open land. Local planning authorities need to consider establishing Green Belts and making local designations, such as green wedges. Both Green Belts and green wedges must be soundly based on a formal assessment of their contribution to urban form and the location of new development and can take on a variety of spatial forms. The essential difference between them is the issue of permanence. Land within a Green Belt should be protected for a longer period than the current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process.”*
- 4.3.47 Details of WCBC’s Strategic Green Wedge Review – Stage 1 has been provided earlier in this Statement. The review concluded that amendments to an area of the designation which includes the application site will be necessary should candidate sites be deemed appropriate for inclusion within the emerging Local Plan. The site has been nominated as part of a larger site for inclusion within the emerging plan for allocation as a housing development site. It is the applicant’s assertion that the site is wholly available, sustainable and deliverable and could deliver much needed open market and affordable housing to help the Council’s current supply shortage, within a 5 year time frame.
- 4.3.48 Irrespective of the above, the site is located within the green barrier. Paragraphs 4.8.14 and 4.8.15 of PPW states that:

“When considering applications for planning permission in Green Belts or green wedges, a presumption against inappropriate development will apply. Local planning authorities should attach substantial weight to any harmful impact which a

development would have on a Green Belt or green wedge. Inappropriate development should not be granted planning permission except in very exceptional circumstances where other considerations clearly outweigh the harm which such development would do to the Green Belt or green wedge.”

4.3.49 As justified earlier within this Statement, it is not considered that the proposal represents inappropriate development because it does not conflict with the purpose of including land within the green barrier. However, even if the proposed development was considered to be inappropriate development, the lack of a 5 year land supply is a very exceptional circumstance and the proposed housing would make a significant contribution to meeting this need that clearly outweighs any harm that the development would do to the green barrier.

4.3.50 The development of the site would not harm the countryside or landscape character in this location. This is because the site forms a logical and sustainable extension to the eastern extremity of the settlement. The site does not represent Best and Most Versatile agricultural land and is not ecologically sensitive. On this basis the proposal is considered to comply with the requirements of PPW.

4.4 Planning Policy Conclusions

4.4.1 Section 38(6) of the Planning and Compulsory Purchase Act (PCPA) and paragraph 3.1.2 of Planning Policy Wales (PPW) (January 2016) require that applications are determined against the policies of the Development Plan unless material considerations indicate otherwise.

4.4.2 An assessment of the proposal against relevant development plan policy, as well as other relevant emerging and adopted planning policy, which may be considered as material to the determination, has been undertaken. This process has demonstrated that whilst there is limited conflict with some policies of the Development Plan, it complies with its provisions when taken as a whole and when considered along with other material considerations, including PPW.

5.0 CONCLUSION

5.1.1 It is apparent from the assessment of the statutory Development Plan and other material planning considerations in the text above, that the Proposed Development is either in conformity with, or supports the objectives of the relevant planning context. As such planning permission should be granted without delay.

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- 5.1.2 The site's location outwith the settlement limit of Gwersyllt bring the proposal into a degree of conflict with Policies PS1 within the UDP. However, WCBC's Preferred Strategy recognises the need to bring forward housing developments on greenfield sites. Furthermore, the policy conflict is outweighed by the lack of a 5 year housing land supply within the WCBC area. This should be attributed considerable weight in the determination of the planning application.
- 5.1.3 The site is wholly available and represents a sustainable development delivering a much needed open market and affordable housing scheme to help the Council's current supply shortage, within a 5 year time frame. It is considered that, in accordance with both the PCPA and PPW, planning permission should be granted without delay.

FIGURES

APPENDICES

PLANNING DRAWINGS