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Planning Services
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Dear Sir

PLANNING APPLICATION FOR RESIDENTIAL DEVELOPMENT

FORMER BRYMBO STEELWORKS, BRYMBO ROAD, BRYMBO, WREXHAM

On behalf of our client, Taylor Wimpey Manchester Limited, please find enclosed an application for full planning permission for the following:

Erection of 10 no. residential dwellings, comprising 8 no. three bedroom units and 2 no. four bedroom units, with associated landscaping, access, and car parking.

This letter provides further details on the proposals and explains the context for the application. The relevant sections of this letter also comprise the Design and Access Statement which is a statutory requirement. This should, therefore, be considered as part of the application submission as appropriate.

The application package has been submitted via the planning portal (Ref: PP-02825768) and comprises the following:

- Planning application forms and certificates;
- Accompanying plans:
 - Location Plan (Dwg. No. 02-100) A4 @ 1:2500
 - Existing Site Survey (Dwg. No. 02-100) A3 @ 1:500
 - Site Context Plan (Dwg. No. 02-201) A3 @ 1:2500
 - Proposed Site Plan (Dwg. No. 02-200) A3 @ 1:500
 - Proposed Floor Plans Riverton 4 Bed (Dwg. No. 201-H1089-PL1) A3 @ 1:100
 - Proposed Floor Plans Gosford 3 Bed (Dwg. No. PA34/4/PL1) A3 @ 1:100
 - Proposed Floor Plans Downham 4 Bed (Dwg. No. PD49/4/PL1) A3 @ 1:100
 - Proposed Floor Plans Bradenham 4 Bed (Dwg. No. PD48/4/PL1) A3 @ 1:100
 - Proposed Elevations Riverton 3 Bed (Dwg. No. 201-H1089-PL2) A3 @ 1:100
 - Proposed Elevations Gosford 3 Bed (Dwg. No. PA34/4/PL2) A3 @ 1:100
 - Proposed Elevations Downham 4 Bed (Dwg. No. PD49/4/PL2) A3 @ 1:100
 - Proposed Elevations Bradenham 4 Bed (Dwg. No. PD48/4/PL2) A3 @ 1:100
 - Proposed Fencing Layout (Dwg. No. 02-600) A3 @ 1:100
 - Proposed Fencing Details (Dwg. No. FD-01) A3 @ 1:20
 - Proposed Materials layout (Dwg. No. 02-500) A3 @ 1:500
 - Site Section A-A (Dwg. No. 02-700) A3 @ 1:200 / 1:500

- Planting Plan (Dwg. No. LDS106-06) 1:200 @ A1
- Code for Sustainable Homes – Design Stage Report (August 2013) by LK Accreditation Limited
- Remediation Technical Note, by Cooper Associates
- Parking Schedule

In accordance with the *Town and Country Planning (Fees for Applications and Deemed Applications) (Amendment) (Wales) Regulations 2009*, a cheque for £3,300 made payable to Wrexham Borough County Council is submitted by post with copy of this letter.

Background

The Brymbo Steelworks, which closed in 1990, was one of the largest steelworks in the country. Since then, the site has been subject to one of the largest regeneration projects in North East Wales. The overall site comprises almost 100 hectares which is elevated and borders the existing communities of Brymbo to the north, Lodge to the east, and Tanyfron to the south.

In 1997 outline planning permission was granted for the redevelopment of the steelworks for housing and employment along with heritage and nature conservation areas (Planning Permission Ref: BRY/CB00016).

This outline consent divided the site into development modules with the employment and heritage modules at the northern end of the site, and the housing modules towards the southern part of the site; connected via a central spine road. Parts of the site were also identified for a new school, retail development and open space provision.

The reclamation works began in 2003 and over 95 hectares of the site have now been remediated for residential, commercial, retail and leisure uses. A series of detailed reserved matters approvals and separate detailed planning permissions have been obtained since 1997 for specific parts of the outline permission and a number of these have been implemented. As you may recall, our client secured planning permission in 2007 and 2009 (Planning Permission Ref: P/2006/1065 and P/2009/0485) for a total of 221 dwellings on the Western Housing Module; these works are now largely complete.

The Site and its Surroundings

This application site comprises a small remediated but undeveloped land parcel, situated at the northern point of the Western Housing Module (as defined by the 1997 outline consent) and thus has been identified as an appropriate location for residential development. The site is also immediately adjacent the consented residential development which is currently under construction (Planning Permission Ref: P/2009/0485).

The site itself is small and irregular in shape, measuring approximately 0.325 hectares in area; and will benefit from an existing access via the adjacent residential development. The site has been cleared and remediated pending redevelopment for residential purposes. It is currently used as a storage area which has facilitated the construction of the adjacent residential development.

As part of the wider remediation works, the site has already been laid out with an almost flat development platform. The topography of the site, therefore, is largely level with that of the adjacent residential development to the south; although the land rises steeply to the west to the adjacent agricultural land, and falls sharply to the north/east into the adjacent Central Housing Module.

The Brymbo steelworks regeneration area has been recognised as a sustainable location for residential development. The site is within the Western Housing Module (as defined by the 1997 outline consent) and located within the settlement boundary of Brymbo as defined by the Wrexham Local Plan. It is within

walking distance of the village of Tanyfron which has a range of existing services including a local shop, a doctor surgery, and a primary school. There are also areas of public open space and local footpaths and cycle ways within the vicinity of the site. The site is also near to a bus stop which provides bus accessibility to larger settlements such as Wrexham and Brymbo. It should be acknowledged that further services and facilities will be delivered in the area as further parts of the wider regeneration project continues to be delivered. It is considered that the site is a suitable location for housing development.

The Proposed Development

This application seeks full planning permission for 10 no. residential dwellings, comprising 8 no. three bed and 2 no. four bed units.

The proposals will complete the Western Housing Module; the layout has therefore been designed to integrate with the adjacent residential development and provide a harmonious extension to the consented scheme. The layout comprises of six semi-detached properties which will back onto the consented residential development; and four larger detached properties which will be positioned opposite, providing a natural termination to the residential development.

Each property will benefit from its own private amenity space and individual parking spaces; these have been delivered in accordance with the Council's standards.

Planning Policy Context

Section 38 (6) of the *Planning and Compulsory Purchase Act 2004* states that regard is to be had to the development plan for the purpose of determining any planning application unless material considerations indicate otherwise. The development plan for this application comprises the adopted Wrexham Unitary Development Plan (UDP) (February, 2005).

It is noted that the Council withdrew their emerging Local Development Plan after the Inspector raised a fundamental concern with regards to a significant shortfall in the supply of housing. The emerging Local Development Plan 2 is now therefore at a very early stage and thus carries no weight.

The adopted UDP Proposal Maps identifies that the application site lies within Land Reclamation Area 4 (Policy EC16) and the Brymbo settlement limit (Policy PS1).

The Land Reclamation policy (Policy EC16) identifies that the Brymbo Steelworks will be reclaimed and restored for beneficial use, namely for housing, employment, and amenity uses. The site, however, was not included as housing allocation within the UDP (Policy H1) because the site already benefited from planning permission and thus was deemed a committed site (UDP Appendix A1). The proposed development, therefore, is a windfall development and should be considered against the UDP policies as a whole.

In terms of the location of housing development, the strategic policies of the UDP, in particular Policy PS1, indicate that new development for housing, employment, and community services should be directed to land within the defined settlement limits. This is reiterated by Policy H2 which permits housing development on unallocated sites within settlement limits on the proviso that it complies with Policy GDP1. This is generic policy will applies to all developments; and requires the consideration of matters such as: design, sustainable development, transportation, nature conservation, pollution/contamination, and flooding.

The affordable housing policy in the UDP (Policy H7) does not apply to this planning application for 10 residential units. This is because the policy only applies to development proposals which exceed 25 or more residential units.

Therefore, the application site, which lies within the Brymbo settlement limit, is an area where the principle of residential development is wholly appropriate. Given this context, the proposed residential development, should be granted planning permission, on the proviso that the development complies with the requirements of Policy GPD1 of the UDP. These matters are considered under the subsequent section of this letter.

Planning Considerations

Design & Access Statement

This Design & Access Statement (DAS) has been prepared in accordance with Welsh Assembly's Technical Advice Note 12 'Design' (2009), Wrexham County Borough Council's Planning Information Sheet (June 2009) and UDP Policy GDP1.

To promote inclusive design, planning applications are now required to be accompanied by an Access Statement DAS; although the statement should be commensurate with the complexity of the planning application.

The following DAS considers the proposals in context of five topic headings; Access; Character; Community Safety; Environmental Sustainability; and Movement to, from and within the development.

Access

The site will be accessed via the adjacent residential development which has access to the wider highway network. The proposed development will continue the layout of adjacent development through the provision of a small cul-de-sac, from which each dwelling will be accessed.

Access to the site is predetermined via the existing spine roads and pedestrian routes that have already been laid out in association with the earlier phases of the Plas Brymbo redevelopment. All vehicular and pedestrian access requirements will be in full, technical accordance with the relevant standards and will not adversely impact the wider highways network.

Similarly, the proposals and house types will be compliant with relevant legislation and best-practice guidance on ensuring that the special needs of disabled users are fully met to ensure the development is socially inclusive.

Character (including amount, layout scale, appearance and landscaping)

The residential proposals will complete the final phase of the larger residential development to the south of the site. The design approach to the proposed scheme has therefore been driven by ensuring that the scheme will be entirely commensurate with the design principles established for this adjacent development.

Therefore, the amount of development is consistent with density of the adjacent residential scheme to the south of the site; and its layout maintains the design principle of units fronting the highway, with landscaped amenity space to their frontage. The appearance, materials, and landscaping of the development is also entirely in accordance with the wider residential development.

Furthermore, when laying out the proposals, sufficient space has been provided between the proposed development and consented dwellings (which will back onto the proposed development). This spacing will prevent the loss of any privacy thus ensuring the amenity of future occupiers.

Community Safety

The scheme has been designed to accord with Wrexham Borough County Council's Guidance Note 24 – Designing out Crime. For instance, the proposals will provide natural surveillance to public areas and neighbouring properties (while maintaining adequate privacy); and the rear gardens will be interlocked with other rear garden to restrict unwanted access from a public area.

Environmental Sustainability

The construction of the homes would meet all relevant standards and Building Regulations in relation to sustainability. Furthermore, the application is accompanied by a Code for Sustainable Homes Pre-Assessment Statement which demonstrates that the proposed development can achieve Code Level 3. Overall, the proposals would have been designed to reduce demand for energy and carbon emission and takes account of the impact of future changes to climate.

Movement to, from and within the development

The site is in a sustainable location with access to good public transport and within walking and cycling distance of key facilities. The proposed development will benefit from safe and clear connections to the adjacent development to the south; which itself is integrated with existing transport infrastructure. The site therefore offer linkages to a range of sustainable modes of transport; thus allowing potential to cycle, walk and use public transport safely, and reducing the reliance on the car.

Nature Conservation

The site is not part of, or in proximity to, any ecologically designated area. There are also no statutorily protected wildlife sites within 1 km of the site. Furthermore the site comprises land which has been remediated for development purposes; and in recent years has been disturbed regularly as part of the construction site for the adjacent residential development. It is considered therefore that the site has low potential for any nature conservation interest and an ecological appraisal of the site is unnecessary.

Pollution / Contamination

The site was previously used as part of the Brymbo Steelworks which closed in 1990. However, as part of the wider regeneration works, the site has been fully remediated, in accordance with an approved remediation strategy, to create a level platform for residential development purposes. Consequently, the site has no pollution or contamination issues. For information purposes, we've enclosed a copy of the approved remediation strategy.

Flooding and Drainage

According to the Welsh Government Flood Maps, the applications site lies within Flood Zone A which is considered to be at little or no risk of flooding; which is an appropriate location for residential development. In terms of foul and surface water drainage, the proposals will connect with the existing systems the adjacent development; ensuring that any foul and surface water is dealt with appropriately.

Other Material Considerations – Housing Supply

It terms of other material considerations, in February 2013 the Council withdrew their emerging Local Development Plan after the Inspector found a fundamental concern with regards to the significant shortfall in the supply of housing (Inspector Preliminary Findings Report, paragraph 2.1).

This was reiterated within the Council's own evidence which identified that the County had a 3.6 year supply of deliverable housing sites (Joint Housing Land Availability Study, March 2013); which is below the requisite 5 year level required by Paragraph 9.2.3 of Planning Policy for Wales (November, 2012).

Given this context of a severe housing shortage, there is an urgent requirement for the County to increase the supply of housing. The granting of planning permissions for small windfall sites, such as this proposal, will help to cumulatively boost the supply of housing in the County and reduce the overall housing shortfall. Hence, we consider that the delivery of housing facilitated through this planning application is an important benefit and should be given considerable weight when assessing this planning application.

Conclusions

In summary, this application comprises the final phase of the Western Housing Module within the wider Brymbo steelworks regeneration project. The site is identified in the UDP as being within the Brymbo settlement limit and the Land Reclamation Area 4. Consequently, the site is considered to be a wholly appropriate location for residential development.

This covering letter, and the details accompanying this application, demonstrates that the proposed development is in a sustainable location and acceptable in terms of design, transportation, nature conservation, pollution/contamination and flooding; thereby satisfying the relevant policies of the UDP.

In addition, the Council has an identified shortfall of housing in the County and therefore the housing delivered as a result of this windfall housing development will make a contribution toward addressing the shortfall. The benefit of housing delivery, which weighs in favour of the proposed development, is thus an important material consideration and should be given considerable weight in the consideration of this application.

Therefore, in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposed development would accord with the development plan and other material considerations, such as housing delivery. We respectfully request, therefore, that planning permission be granted.

I trust the planning application is in order and you have all the information required to register and progress this application towards a successful determination.

If you require any further information, or wish to discuss anything I have mentioned in further detail, please do not hesitate to contact me.