

PLANNING STATEMENT

Bonc Wen, Rhosllannerchrugog, Wrexham, LL14 2EE

North Wales Housing Association

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1. Introduction

- 1.1. Broadgrove Planning and Development Limited have been instructed by North Wales Housing Association (the applicant) to prepare a Planning Statement to accompany an application seeking full planning permission for the erection of 12 dwellings with associated landscaping and access at Bonc Wen Car Park, Rhosllannerchrugog, Wrexham.
- 1.2. This Planning Statement details the proposals and addresses relevant issues and material planning considerations as identified in national and local planning policy.
- 1.3. The principle of a residential use was established through the previous planning approvals relating to the site. In the context of this application, the main issues relate to the design and layout of the scheme and the protection of neighbouring amenity.
- 1.4. This statement should be read in conjunction with the following plans and reports which accompany the application:
 - Planning application forms and certificates;
 - Drawings –
 - 5525_SK1000 - Site Location Plan;
 - 5525_SK1001 P3 – Site Plan;
 - 5525_SK1101 P1 – Existing Site Plan;
 - 5525_SK2001 P2 – Walk-up Apartments Block A – Floor Plans;
 - 5525_SK2002 P3 – Walk-up Apartments Block B – Floor Plans;
 - 5525_SK3000 P2 – Walk-up Apartments Block A – Elevations;
 - 5525_SK3001 P1 – Walk-up Apartments Block B – Elevations;
 - 5525_SK4000 P3 – Site Section;
 - 5525_SK8000 P7 – Site Layout Plan.
 - 5525_SK8001 - Indicative Landscape Strategy;
 - 5525_SK80002 – Opportunities and Constraints.
 - Design and Access Statement;
 - Transport Technical Note;

- Coal Mining Risk Assessment;
- Flood Consequence Assessment and Drainage Strategy;
- Preliminary Ecological Appraisal;
- Pre-application Consultation Report (PAC Report).

1.5. The supporting documents provided to support the application reflects the listed provided in the Council's pre-application response. All the information necessary to determine the application should be found within these documents.

1.6. This submission of this application was preceded by pre-application consultation in compliance with Article 1 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2016. The details of the consultation are set out within the PAC Report which accompanies the application.

2. Site and Surrounding Area

- 2.1. The application site comprises the existing Council car park and adjacent land and is sited to the west of Bonc Wen, Rhosllannerchrugog (Rhos). The site has an approximate area of 0.43 hectares.
- 2.2. The southern part of the site comprises an existing car park which appears to be well used. The car park is not marked out, and the surface is unmade and uneven. As such parking is haphazard and space is used inefficiently. The northern part of the site comprises previously developed vacant land and a small parcel of green space.
- 2.3. The site is accessed from Bonc Wen at the south of the site, close to the junction with Brook Street. A public footpath runs along the north-west edge of the site. A pedestrian route exists through the site from south-east to west where it joins the footpath.
- 2.4. The site is located within a predominantly residential area and is surrounded by housing on all sides. The site is located just 200m from Market Street which contains several shops and services. Bus services operate from Market Street with regular services to Wrexham.
- 2.5. The Natural Resources Wales' Flood Risk Map identifies that the site is within Flood Zone A.
- 2.6. A site location plan has been attached at Appendix 1.

3. Planning History

- 3.1. The following applications relating to the site are relevant to the proposed application.
- 3.2. P/2015/0915 – Residential (social housing) development (11 dwellings – 1 no bungalow, 1 no block of 4 apartments, 3 no pairs of semi-detached houses). Approved subject to conditions 01/02/2016.
- 3.3. P/2010/0243 - Residential development (Outline submission with all detailed matters reserved). Approved subject to conditions 26/07/10. The indicative layout included a residential development of 9 dwellings.

4. Proposed Development

- 4.1. The proposal involves the erection of 12 x one-bedroom apartments. The apartments would be accommodated within three two storey buildings. All of the apartments will be affordable.
- 4.2. The development will include access and car parking, with the provision of an enhanced landscaping scheme.
- 4.3. The scheme will provide 18 parking spaces in connection with the proposed units, this is in line with adopted parking standards which require 1.5 spaces per one bed unit.
- 4.4. Secure cycle parking will be provided within a communal building for all dwellings.
- 4.5. The site will be accessed through the adjacent car park which will be re-configured and formalised to provide 42 spaces. The layout of the adjacent car park will be as approved by application P/2015/0915.

5. Planning Policy Framework

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act (2004) and Section 70(2) of the Town and Country Planning Act (1990) state that planning applications must be determined in accordance with the Development Plan unless relevant material considerations indicate otherwise.
- 5.2. The Development Plan consists of Wrexham Unitary Development Plan 1996-2011, which was adopted in February 2005. Material considerations include Planning Policy Wales, emerging planning policy and supplementary planning guidance.
- 5.3. Given the previous permission for residential development of the site remains extant and the current development will be assessed against the same plan, the policy context remains the same.

Development Plan

- 5.4. The following policies from the Wrexham Unitary Development Plan 1996-2011 (2005) are relevant to the proposals:
 - Policy PS1 – Location of New Development;
 - Policy PS2 – Landscape and Townscape Character;
 - Policy PS3 – Use of Previously Developed Land;
 - Policy GDP1 – Development Objectives;
 - Policy H2 – Residential Development (of unallocated Land) within Settlements;
 - Policy H7 – Affordable Housing;
 - Policy CLF5 - Open Space Requirements from new Residential Developments;
 - Policy T8 – Parking.

Emerging Policy

- 5.5. The Council are working on their Local Development Plan 2 (LDP2) 2013 to 2028. When adopted the LDP2 will replace the current UDP.
- 5.6. The LDP was submitted to the Welsh Government and PINS for examination in November 2018. Initial hearing sessions were carried out in Autumn 2019 and several further sessions were carried in February and March 2020 following the receipt of the inspectors post-hearing

letter. Given delays relating to the current pandemic it is now anticipated that the inspectors report will be issued no later than 31 December 2020.

- 5.7. Whilst the emerging plan is at an advanced stage it is not anticipated it will be adopted until 2021, therefore the proposed development will be assessed against UDP policies. The emerging plan should be afforded limited weight.

Supplementary Planning Guidance

- 5.8. Although not part of the Development Plan the following local planning guidance notes are also relevant to the proposed development:

- Affordable Housing;
- Design;
- Parking Standards;
- Space around Dwellings;
- Designing out Crime;

Planning Policy Wales (PPW - Edition 8, January 2016)

- 5.9. Planning Policy Wales (PPW, Edition 10) was adopted in December 2018. It sets a presumption in favour of sustainable development in accordance with the Development Plan for the area unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.
- 5.10. The document highlights 7 well-being goals which were introduced by the Well-being of Future Generations (Wales) Act 2015 which places a duty on public bodies that they must carry out sustainable development. It supports the presumption in favour of sustainable development, particularly of previously developed land and underlines that in making decisions, LPAs, applicants and local communities to secure developments in a timely fashion and improve the economic, social and environmental conditions of the area.
- 5.11. The following specific elements of PPW are of relevance to the development proposals:
- In relation to planning for sustainability, PPW identifies that the planning system has a key role to play in minimising the causes of climate change including creating sustainable patterns of development. Higher density development is encouraged near to public transport nodes or areas that are well served by public transport therefore reducing the need to travel by private car. PPW has a strong preference to the use of

previously developed land, particularly vacant or under-used land in existing settlements;

- In respect of housing, PPW expects sustainable residential developments to be promoted through the planning system with an emphasis on the well-designed living environments and the construction of housing with low environmental impact;
- Good design should promote the efficient use of resources, including land. Maximising the use of suitable previously developed and/or underutilised land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites;
- A community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications.

Technical Advice Notes (TAN)

5.12. Technical Advice Notes (TANs) are produced by the Welsh Government and to supplement the guidance provided in PPW and they may be material to the determination of applications for planning permission. TANs of relevance to the development proposals are summarised as follows:

- TAN 2: Planning and Affordable Housing (2006): TAN 2 provides guidance on how the planning system can be used to implement and monitor the provision of affordable housing in Wales;
- TAN 12: Design (2016): TAN 12 provides additional guidance and detailed advice on how good design should be achieved through the planning process; and
- TAN 18: Transport (2007): This TAN describes how land use and transport planning should be integrated through the planning system, including how the transport impacts arising from development should be assessed and mitigated. It encourages development to be sited in highly accessible locations and provides guidance on the design of the transport requirements associated with new development including parking, walking and cycling and public transport.

6. Planning Considerations

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act (2004) and Section 70(2) of the Town and Country Planning Act (1990) state that planning applications must be determined in accordance with the Development Plan unless relevant material considerations indicate otherwise.
- 6.2. The key planning issues are considered in turn below:

Principle of Development

- 6.3. The application site is within a sustainable location which is predominantly residential in character. The site is located within the development settlement limits of Rhos and is not subject to any site-specific designations. As such residential development of the vacant site is acceptable in principle as it is in accordance with UDP Policy PS1 which seeks to direct development to defined settlements and Policy PS3 which encourages the use of previously developed vacant and underused land wherever possible.
- 6.4. The principle of developing the site for residential purposes was established initially through the approval of P/2010/0243 and then through planning approval for P/2015/0915 which sought the erection of 11 dwellings including semi-detached houses, a bungalow and apartments.
- 6.5. The previous application remains extant and is therefore a realistic fall-back option. It is however considered that the current proposals offer additional benefits compared to the previous scheme. Not only will the proposals provide an additional dwelling, but the scheme represents a better designed development which will give future residents a better standard of living whilst protecting the amenity of neighbouring residents.

Layout and Design

- 6.6. The proposals represent a high-quality development, which will enhance the appearance of the site and make a positive contribution to the locality in accordance with Policy GDP1.
- 6.7. The layout consists of three apartment blocks each consisting of 4 walk-up apartments. The ground floor units will be accessed from a door in the front elevation and have the benefit of a private rear garden. The first-floor units would be accessed via a door to the side elevation with outside space being provided in a generous balcony to the rear.
- 6.8. All units have one bedroom and would comprise affordable housing. The size and type of units proposed has regard to local need.

- 6.9. All apartments in the scheme achieve the National Space Standards for 1 bedroom 2 person dwellings. All ground floor apartments have a floorspace of 54sqm and first floor apartments have floor areas of 59sqm.
- 6.10. The buildings will have the appearance of a traditional semi-detached dwellings which is in keeping with the built character of the surrounding area which predominant comprises two storey dwellings. Whilst the area is mixed in terms of elevational materials including render, pebbledash and stone, the use of brick is dominant and therefore has been incorporated into the scheme. Interest is added through the use of white decorative bricks on the principal elevation above the front doors.
- 6.11. Secure communal refuse and cycle stores would be provided for residents adjacent to the access, close to the entrance of the site and within easy reach of all properties.
- 6.12. The site will be accessed through the adjacent car park which will be re-configured and formalised to provide 42 spaces. The layout of the adjacent car park will be as approved by application P/2015/0915.

Neighbouring Amenity

- 6.13. In terms of neighbouring amenity, the proposed scheme provides separation distances in excess of the standards set out in the Council's Space around Dwellings Guidance Note which requires 13 metres between habitable windows and blank elevations. In addition, it is noted that the proposed separation distances are more generous than those in the approved extant scheme. The separation provided will ensure the privacy of new and existing residents is not compromised.
- 6.14. No flank windows are provided within Block B or B(M) which ensures there would be no overlooking or loss of privacy.
- 6.15. Given that the surrounding area is predominantly residential, introducing further residential development would not result in an increase in noise and disturbance. It is considered that the proposal would not have an adverse impact on neighbouring residential amenity.

Affordable Housing

- 6.16. UDP Policy 7 concerns the provision of affordable housing on large sites providing more than 25 units. As the proposed development is under this threshold there is not requirement to provide affordable housing on site. However, the application is being progressed by North

Wales Housing Association, as mentioned above all the units provided as part of the redevelopment of the site will be offered as affordable.

Security

- 6.17. Public and private spaces are clearly defined within the development. The orientation of the buildings allows for clear overlooking of and the car parking spaces, this ensures a high level of natural surveillance of these areas. The scheme also provides secure refuse and cycle stores.

Highways

- 6.18. It is considered that the site is well located in order to encourage sustainable methods of transport, including public transport, cycling and walking. The site is located just 200m from Market Street which contains several shops and services. Bus services also operate from Market Street with regular services to Wrexham.
- 6.19. The highway conditions and access to the site were considered during the extant scheme and the same considerations apply in this instance. The housing development will be accessed from the north through the adjacent car park.
- 6.20. The scheme would provide a total of 18 parking spaces. The parking provision consists of 1.5 spaces per dwelling. The provision meets the policy requirement which is expressed as a maximum.
- 6.21. Swept path analysis has been included illustrating the viability for a large refuse vehicle and fire appliance to enter, turn and exit the site in a forward gear. In addition vehicle tracking illustrates that cars will be able to manoeuvre into and out of the proposed parking spaces.
- 6.22. As per the consented scheme, an indicative layout showing revisions to the council car park has been provided, illustrating the viability for 42 car parking spaces to be made, along with a pedestrian route within the council car park, between the development site and Bonc Wen to the south. It is expected that full design details including layout and drainage will be required by condition.
- 6.23. An assessment of the likely level of vehicular movements that will be created by the development during a standard weekday has been undertaken. This assessment has forecast that between 6 and 7 vehicular movements will be created during a standard weekday peak hour, and a total of approximately 57 movements during a normal weekday. This level of trip making is considered to be low and as such would not have a material bearing upon the

capacity of the surrounding highway network. In transportation and highway safety terms, there are no overriding issues that would prevent the granting of planning permission

Trees

- 6.24. There are no significant or protected trees on the application site which would prevent the proposed development. There is one medium sized tree located along the northern boundary which is identified on the submitted plans. The tree is located sufficient distance away from the proposed dwellings to ensure it will not be affected by the development. Tree protection details can be secured by condition.
- 6.25. Currently the site is unkept and is not an asset to the local area, the proposals would be developed with a new landscaping scheme which along with the well-designed new dwellings will improve the appearance of the site.

Ecology

- 6.26. A Preliminary Ecology Appraisal has been prepared and accompanies the application submission. The report identifies ecological constraints relevant to the proposal and sets out recommendations that should be implemented to ensure that the development is in conformity with protected species legislation and to mitigate any harm to protected and/or notable species/habitats.
- 6.27. No statutory or non-statutory designated sites would be directly impacted by the proposed development. The habitats within the site are attributed low value, the loss of the habitat will not result in any significant impacts. The loss of small areas of uncut grassland would be offset to some extent by the proposed landscaping/ garden areas. The appraisal suggests some enhancement of the small public spaces proposed within the site. These enhancements include the addition of native trees, native scrub and species-rich lawn turf.
- 6.28. In relation to bats, one large tree within the site was identified, however the tree has negligible roosting potential. Foraging potential within the site is considered to be limited. A recommendation has been made for sympathetic lighting to be installed that would ensure no significant impact on potential foraging and commuting resources close to the application site.
- 6.29. Further suggested mitigation includes the addition of bird boxes on some of the proposed buildings. Fences should also allow hedgehogs to access gardens and traverse across the site.

Coal Mining

- 6.30. Given the presence of coal mining shafts within the site boundaries a Coal Mining Risk Assessment has been carried out to inform the development and forms part of the submission. The proposed dwellings have been positioned away from the shafts and the report provides details of capping and remedial works.

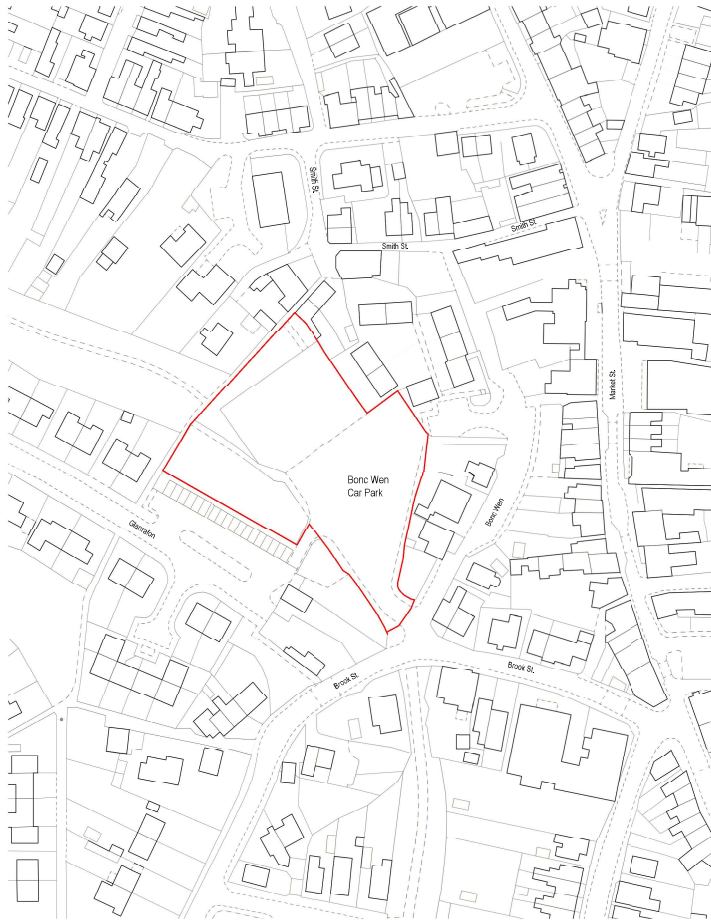
Flood Risk

- 6.31. The Natural Resources Wales' Flood Risk Map identifies that the site is within Flood Zone A. The application is supported by an FRA which identifies the development is at a low risk of flooding from all sources.

7. Conclusions

- 7.1. The applicant is seeking full planning permission for the erection of 11 affordable dwellings with associated landscaping and access on a site located at Bonc Wen Car Park, Rhosllannerchrugog.
- 7.2. The provision of 11 new homes which would contribute towards the Council's housing land supply and meet an identified need for smaller affordable units. The proposed use is entirely appropriate for this location and would serve to enhance the vitality of the locality. The Council have previously acceptable the principle of residential development at the site.
- 7.3. The proposal represents a well-designed development which would protect and enhance the appearance of the site and wider area. The height and scale of the apartment's blocks are appropriate given the local context and will ensure the amenity of neighbouring and future residents is protected.
- 7.4. The proposals have been assessed against all relevant national and local planning policy and the Planning Policy Wales presumption in favour of sustainable development. For the reasons stated in this statement it is requested that the officer appointed to determine this application should look upon this scheme favourably and recommend approval without delay.
- 7.5. Should there be any queries regarding the application submission then please contact Jack Appleton (ja@broadgrove.co.uk).

APPENDIX 1



Notes	
The Contractor is to check all dimensions and conditions on site before commencing. Do not scale from this drawing. This drawing remains the copyright of POZZONI Architecture Ltd.	
Scale Bars TO BE USED ONLY AS GUIDANCE	
1:100	mm
1:200	mm
1:500	M
1:1250	M

Rev	Description	By	Date
Client	PDW		
Job	Bonc Wen, Rhos		
Drawing	Location Plan		
Rev	5525_SK1000		
Rev	SK1000		
Date	20/07/20	Scale	1 : 1250
Rev	@ A3		
Rev	JG	ET	
Rev	Planning	Tender	Construction
Rev	Design	Contract	As Built



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