

Planning Appeal Reference APP/H6955/A/19/3238474

**Re: Outline planning application for residential development, up to 112 dwellings,
together with vehicular / pedestrian access from Gatewen Road, open space,
landscaping, sustainable drainage and other related infrastructure**

Objection Submitted

By

John Filce

Dated this 5th Day April 2020

Objection

Appeal Reference APP/H6955/A/19/3238474

Opposition Statement from John Filce

1. Introduction

This Statement is made to supplement the Objection that I made to Wrexham Council regarding the Planning Application P/2019/0674 on the 26th June 2019. The purpose of this additional statement is to bring to the attention of the Planning Inspector additional evidence that has become available since my original objection. In addition, I wish finally to support the LPA Grounds on which the refusal was made.

2. LDP Evidence

Reference is made in the Applicant's Statement of Case as follows:- *"the need for new housing to come forward both within a future development plan, but also the important requirement for housing to come forward in advance of a future plan being adopted, to meet the pressing need for new housing within Wrexham"*.

- a) The situation is that the extant Wrexham Council UDP is still current and will remain so until the Deposited LDP has passed through the Examination in Public and has been adopted by WCBC. The LDP Examination in Public (EiP) Hearings were not complete until March 2020 and the Plan will not be adopted until the middle part of 2020 at the earliest if found sound. In this context it is important to note that following the advice of the WCBC Chief Planning Officer 1st July 2019 (Gamford Lane Rossett P/2019/0246) on the 3 topics of Green Wedge, Special Landscape Areas and Settlement Limits *"only limited weight can be afforded to the proposed removal from the LDP so that this application can and must be considered under the provisions of the Extant WCBC UDP, PPW10 and the Future Generations Well-being Act (Wales) 2015"*. It is clear that reference to the emerging LDP carries little or no weight in the present circumstances whilst the Deposit LDP has not been adopted and the decision must be made under the UDP and PPW10.
- b) As far as the continual shortfall of housing is concerned the LPA advised the EiP on the opening day of the Hearings (4th September 2019) that WCBC actually have a 5-year land bank and not the "judged to be zero land bank" as previously claimed. This is contained in Document BP08b submitted with this objection and a copy of the most relevant page showing the land bank totals is attached at Appendix 1.
- c) Since TAN1 was revoked on the 26th March 2020 any reference to JHLAS no longer has any bearing in this matter and the disclosure of a 5-year land bank dispels any suggestion that there is a need to develop in this place. The University are not planning to develop this site as they only have need to sell the site and this along with the green field site at Dean Road App/H6995/A/19/3238470 to raise funds to support building elsewhere.
- d) The LDP Hearings have disclosed that the LPA cannot show need in this place nor in any other place in the County Borough as they had 5 years of Land bank as at 4th September 2019. The Welsh Government Population predictions show for the period of the LDP as falling and that there will be a surplus of 490 houses available at the end of the plan period. Demonstration of the aspirational need for 8525 has not been demonstrated. See Appendix 2.
- e) During the LDP examination it has been contested that no site allocation containing BMV land should be permitted as the sequential tests have not been carried out and this challenge has not yet been resolved. To overcome this problem an Objector has submitted a revised housing target of 6000 houses which meets the requirements of the NDF in terms of target totals and eliminates

the need for building on 165ha of BMV grades 1, 2 and 3a agricultural land by bringing forward lesser quality greenfield sites. See Appendix 3. It is therefore by no means certain that the LDP will allocate sites with BMV agricultural land so this application should be considered on its merits to stand alone in relation to UDP & PPW policies.

- f) At the LDP hearings the parlous state of the infrastructure, especially on flooding and drainage, was highlighted to the Inspectors with ongoing graphic descriptions of how badly the community had fared following the major storm in June 2019 and this was accepted without query by the LPA confirming the points made by local residents that the Well-being of the Community was being further jeopardised by this un-needed, unwanted, and inappropriate development.

3. Appeal Type Consideration

- a) The applicant has asked for this site to be considered at a joint Inquiry along with another University Site at Dean Road Wrexham. This suggestion is opposed on the grounds that the scale of the two sites does not warrant this process bearing in mind the most recent decision on a site in Rossett Wrexham for 132 houses was handled by Written Representations. Neither site is as large as the Rossett Site, one is included within the LDP for Allocation, the other is not and they are about 2 miles apart. In the present situation with Coronavirus lock down of virtually all the respondents that wish to contribute to the Appeal Proceedings the most practical manner in which this matter could be progressed safely would be by separate written representations.

4. Best & Most Versatile Land

- a) The site contains BMV agricultural land as follows: The Welsh Government's Predictive Agricultural Land Classification (ALC) map confirms that the site is Grade 2 agricultural land – i.e. contains Best and Most Versatile (BMV) land. As such planning policy EC2 and Planning Policy Wales paragraphs 3.54 & 3.55 are applicable. WCBC UDP Policy States: EC2 Development on agricultural land of grades 1, 2 or 3a will only be permitted if it does not lead to the irreversible loss of that land. The development of this site will lead to the permanent irreplaceable loss of BMV Land predicted Grade 2.
- b) In addition, PPW10 Paragraphs 3.55 goes on to state *"When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade"*.
- c) In this context no sequential test has ever been carried out by the LPA or the Applicant and therefore the provisions of PPW10 3.54 and 3.55 have never been satisfied. As a result, the proposed development also contravenes UDP Policy EC2 and the Inspector is respectfully asked to dismiss the Appeal and to add Policy EC2 regarding the BMV agricultural land to any refusal. I draw the following Appeal Case to the attention of the Inspector as this is very relevant to this development proposal. Please See APP/A6835/A/17/3171383 relating to Land East of Northop Brook, Northop, Flintshire.
- d) The proposed development on BMV agricultural land in what the Applicant describes as grazing land contravenes the Wales Emergency Climate Plan's directive Low Carbon Delivery Plan which

shows that the use of green fields for housing substantially increases the CO2 footprint thus conflicting with the Well-being of Future Generations (Wales) Act 2015. In making this statement I am mindful that the **Welsh** Government published its first **low carbon delivery plan**, Prosperity for All: A **Low Carbon Wales**, in March **2019**. The **delivery plan** (a requirement under the Environment (**Wales**) Act 2016) sets out how **Wales** aims to meet its first **carbon** budget (2016-2020) and consequently its **2020** interim emissions reduction target. As this plan was in place prior to the Planning Committee decision in July 2019 this factor should have been broadly included in the refusal notice along with other contraventions of the UDP.

5. Grounds for Refusal Support

5.1 In making their decision the Council considered that the additional traffic generation from the proposed development will cause a significant detrimental impact upon the local highways network, The LPA decided that to allow the development would be contrary to the Wrexham Unitary Development Plan Policy GDP1(d). As a resident of Wrexham, I can confirm from my personal experiences what the LPA have said about the local roundabouts at peak times (pre corona virus). as these are normally gridlocked or very close thereto. I therefore support the LPA refusal under UDP Policy GDP1(d).

5.2 The proposed development lies outside defined settlement limits and represents inappropriate development for sites within Green Barriers. To allow the development would therefore conflict with the Wrexham Unitary Development Plan Policies PS1 and EC1. I therefore wish to add my support for refusal on these grounds and in addition to the UDP Policies stated I would aver that the development conflicts with PPW10 Para 3.70 & 3.71.

6. Conclusions

Overall, this proposed unsustainable development outside the settlement boundary, in a Green Barrier, which substantially badly impacts on traffic generation on BMV Land and represents inappropriate development in this part of Wrexham. No need has been demonstrated by the Applicant that there is any additional housing in this area of Gatewen and such speculative development will be damaging further the infrastructure and the Well-being of that Community, bearing in mind that the LDP submissions have not confirmed the need either.

In summary I respectfully ask the Inspector to refuse this application on the following grounds that it contravenes PPW 10 Paragraphs 3.54,3.55, 3.70 & 3.71, WCBC UDP Policies PS1, EC1, EC2 and GDP 1(d).

Table 19 – Housing Land Supply in Years (2019 – 2028) Updated April 2019

Year	A 5 Year Housing Requirement*	B Annual Requirement (A/5)	C Total no. dwellings to be built within 5 years*	D Land Supply in Years (C/B)
2019	3471	694	3716	5
2020	3688	738	4001	5
2021	3746	749	3903	5
2022	3753	751	3779	5
2023	3686	737	3500	5
2024	3419	684	3025	4
2025	3332	666	2650	4
2026	3279	656	2313	4
2027	3167	633	1910	3
2028-	3116	623	1575	3

***See Appendix C for these figures**

Appendix 2 - Extract from Wales Stats 2018 Published Feb 2020

Household Projections 2018															Population Projections 2018														
	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030		2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030		
1	Wales	1358754.931	136064.532	1370461.492	1375371.217	1380278.048	1384593.602	1388028.275	1390710.649	1393129.375	1395150.286	1396823.547	1398252.293	1399374	Wales	1358754.931	136064.532	1370461.492	1375371.217	1380278.048	1384593.602	1388028.275	1390710.649	1393129.375	1395150.286	1396823.547	1398252.293	1399374	
2	Isle of Anglesey	31169.69779	31192.26106	31205.39648	31211.66221	31215.27171	31204.12608	31178.84997	31132.57528	31085.03723	31026.02755	30965.45619	30909.27428	30838.81	Isle of Anglesey	31169.69779	31192.26106	31205.39648	31211.66221	31215.27171	31204.12608	31178.84997	31132.57528	31085.03723	31026.02755	30965.45619	30909.27428	30838.81	
3	Gwynedd	54340.94589	54606.8381	54798.1536	54968.66653	55143.96367	55300.31632	55423.71834	55529.73882	55624.26012	55702.24599	55760.96239	55806.41397	55848.29	Gwynedd	54340.94589	54606.8381	54798.1536	54968.66653	55143.96367	55300.31632	55423.71834	55529.73882	55624.26012	55702.24599	55760.96239	55806.41397	55848.29	
4	Conwy	52753.20004	52902.01278	53029.69507	53150.30361	53267.21918	53356.27256	53413.97678	53446.6331	53466.1683	53463.62817	53449.85757	53435.60461	53405.52	Conwy	52753.20004	52902.01278	53029.69507	53150.30361	53267.21918	53356.27256	53413.97678	53446.6331	53466.1683	53463.62817	53449.85757	53435.60461	53405.52	
5	Denbighshire	41639.43814	41705.69053	41736.7124	41762.80871	41792.44846	41796.48113	41772.48224	41717.82555	41652.37894	41574.90402	41477.29163	41386.99381	41291.7	Denbighshire	41639.43814	41705.69053	41736.7124	41762.80871	41792.44846	41796.48113	41772.48224	41717.82555	41652.37894	41574.90402	41477.29163	41386.99381	41291.7	
6	Flintshire	66231.27855	66510.49931	66766.03841	66987.05588	67204.51816	67380.73711	67510.39784	67599.61702	67671.29074	67709.71399	67728.26251	67723.89978	67695.83	Flintshire	66231.27855	66510.49931	66766.03841	66987.05588	67204.51816	67380.73711	67510.39784	67599.61702	67671.29074	67709.71399	67728.26251	67723.89978	67695.83	
7	Wrexham	58745.66925	58795.49374	58812.80797	58819.32683	58813.56653	58786.95464	58733.99924	58648.18486	58567.85344	58466.85349	58363.12784	58256.34468	58123.48	Wrexham	58745.66925	58795.49374	58812.80797	58819.32683	58813.56653	58786.95464	58733.99924	58648.18486	58567.85344	58466.85349	58363.12784	58256.34468	58123.48	
8	Powys	59663.79269	59737.29983	59791.09859	59826.59812	59843.44036	59829.83274	59790.83661	59705.91318	59613.84168	59491.27597	59359.00588	59215.18629	59048.44	Powys	59663.79269	59737.29983	59791.09859	59826.59812	59843.44036	59829.83274	59790.83661	59705.91318	59613.84168	59491.27597	59359.00588	59215.18629	59048.44	
9	Ceredigion	31190.23519	31071.16691	30921.89219	30747.44503	30567.47605	30404.24748	30247.78735	30110.62644	29975.40138	29841.5149	29699.71595	29565.0154	29446.82	Ceredigion	31190.23519	31071.16691	30921.89219	30747.44503	30567.47605	30404.24748	30247.78735	30110.62644	29975.40138	29841.5149	29699.71595	29565.0154	29446.82	
10	Pembrokeshire	55618.14368	55892.47885	56134.31879	56359.73009	56597.09644	56791.0851	56936.90332	57045.88031	57124.56987	57185.9279	57218.39049	57231.04421	57226.12	Pembrokeshire	55618.14368	55892.47885	56134.31879	56359.73009	56597.09644	56791.0851	56936.90332	57045.88031	57124.56987	57185.9279	57218.39049	57231.04421	57226.12	
11	Carmarthenshire	81504.6311	81759.90965	81978.71835	82182.05768	82383.1946	82557.15416	82680.13973	82755.9281	82811.48457	82854.93747	82878.90735	82879.79515	82855.62	Carmarthenshire	81504.6311	81759.90965	81978.71835	82182.05768	82383.1946	82557.15416	82680.13973	82755.9281	82811.48457	82854.93747	82878.90735	82879.79515	82855.62	
12	Swansea	108873.7428	109618.5238	110260.2012	110857.7897	111449.7763	111998.8496	112461.7203	112898.5332	113334.1785	113748.9304	114153.8468	114526.0641	114883.4	Swansea	108873.7428	109618.5238	110260.2012	110857.7897	111449.7763	111998.8496	112461.7203	112898.5332	113334.1785	113748.9304	114153.8468	114526.0641	114883.4	
13	Neath Port Talbot	62054.06184	62228.65541	62394.17418	62552.58635	62711.63368	62875.98616	63006.97238	63093.87485	63181.38745	63247.27422	63303.41733	63350.0631	63378.36	Neath Port Talbot	62054.06184	62228.65541	62394.17418	62552.58635	62711.63368	62875.98616	63006.97238	63093.87485	63181.38745	63247.27422	63303.41733	63350.0631	63378.36	
14	Bridgend	61841.56522	62259.32974	62639.68541	63001.32413	63362.43669	63690.60262	63975.0022	64200.97807	64458.40111	64677.12322	64874.35048	65042.95831	65194.43	Bridgend	61841.56522	62259.32974	62639.68541	63001.32413	63362.43669	63690.60262	63975.0022	64200.97807	64458.40111	64677.12322	64874.35048	65042.95831	65194.43	
15	Vale of Glamorgan	57230.2984	57716.86998	58198.25595	58642.77295	59093.35431	59520.76628	59884.60902	60205.50644	60497.32768	60769.29936	61030.49776	61252.93832	61456.02	Vale of Glamorgan	57230.2984	57716.86998	58198.25595	58642.77295	59093.35431	59520.76628	59884.60902	60205.50644	60497.32768	60769.29936	61030.49776	61252.93832	61456.02	
16	Cardiff	153203.8325	154405.7242	155366.481	156212.8497	157047.8659	157845.4795	158530.4989	159148.3268	159755.4531	160334.3167	160862.1442	161378.8645	161900.0	Cardiff	153203.8325	154405.7242	155366.481	156212.8497	157047.8659	157845.4795	158530.4989	159148.3268	159755.4531	160334.3167	160862.1442	161378.8645	161900.0	
17	Rhondda Cynon Taf	104864.752	105534.2266	106159.9749	106753.7207	107361.7165	107909.4169	108384.9532	108805.6593	109196.4267	109568.2609	109909.0863	110226.6617	110536.8	Rhondda Cynon Taf	104864.752	105534.2266	106159.9749	106753.7207	107361.7165	107909.4169	108384.9532	108805.6593	109196.4267	109568.2609	109909.0863	110226.6617	110536.8	
18	Merthyr Tydfil	24868.97005	24947.17478	25008.31822	25061.77518	25121.43892	25163.85409	25199.31443	25212.29035	25219.78123	25221.95421	25214.39282	25201.89618	25182.72	Merthyr Tydfil	24868.97005	24947.17478	25008.31822	25061.77518	25121.43892	25163.85409	25199.31443	25212.29035	25219.78123	25221.95421	25214.39282	25201.89618	25182.72	
19	Caerphilly	76657.70572	76929.27753	77154.26993	77357.95142	77565.51358	77725.36429	77834.74454	77888.96277	77912.42413	77919.71923	77912.42413	77890.20703	77841.07	Caerphilly	76657.70572	76929.27753	77154.26993	77357.95142	77565.51358	77725.36429	77834.74454	77888.96277	77912.42413	77919.71923	77912.42413	77890.20703	77841.07	
20	Blaenau Gwent	31073.84827	31127.1091	31166.06376	31197.45174	31239.31858	31259.23623	31276.68337	31266.95109	31246.93179	31210.71423	31165.11232	31131.79501	31086.53	Blaenau Gwent	31073.84827	31127.1091	31166.06376	31197.45174	31239.31858	31259.23623	31276.68337	31266.95109	31246.93179	31210.71423	31165.11232	31131.79501	31086.53	
21	Torfaen	39957.52108	40139.30748	40292.68391	40434.69145	40581.43141	40708.2218	40806.42191	40876.82315	40939.25198	40988.6787	41026.35497	41068.06059	41103.56	Torfaen	39957.52108	40139.30748	40292.68391	40434.69145	40581.43141	40708.2218	40806.42191	40876.82315	40939.25198	40988.6787	41026.35497	41068.06059	41103.56	
22	Monmouthshire	40114.36831	40260.58791	40392.95694	40516.991	40632.68187	40717.13419	40767.88054	40802.75917	40824.98209	40842.83786	40849.42267	40845.1683	40832.39	Monmouthshire	40114.36831	40260.58791	40392.95694	40516.991	40632.68187	40717.13419	40767.88054	40802.75917	40824.98209	40842.83786	40849.42267	40845.1683	40832.39	
23																													
1	Wales	3138631	3145030	3147908	3148072	3146354	3142897	3137303	3129631	3126367	3122584	3118584	3115344	3113344	Wales	3138631	3145030	3147908	3148072	3146354	3142897	3137303	3129631	3126367	3122584	3118584	3115344	3113344	
2	North Wales	698369	698613.8371	698136.6072	697171.3152	695841.0021	694099.4067	691865.032	689135.168	686260.3679	683245.6628	680156.4208	677019.39582	674019.39582	North Wales	698369	698613.8371	698136.6072	697171.3152	695841.0021	694099.4067	691865.032	689135.168	686260.3679	683245.6628	680156.4208	677019.39582	674019.39582	
3	Isle of Anglesey	69961	69840.98717	69665.34663	69448.91317	69200.67285	68913.12358	68593.22516	68220.89132	67834.24251	67424.9239	67019.39582	66624.9239	66249.9239	Isle of Anglesey	69961	69840.98717	69665.34663	69448.91317	69200.67285	68913.12358	68593.22516	68220.89132	67834.24251	67424.9239	67019.39582	66624.9239	66249.9239	
4	Gwynedd	124178	124471.4014	124578.0175	124545.927	124431.4775	124271.5609	124069.0705	123824.2303	123572.9822	123312.9442	123019.2662	122724.9442	122449.2662	Gwynedd	124178	124471.4014	124578.0175	124545.927	124431.4775	124271.5609	124069.0705	123824.2303	123572.9822	123312.9442	123019.2662	122724.9442	122449.2662	
5	Conwy	117181	117247.5689	117228.7404	117158.5891	117039.0172	116844.992	116656.2512	116494.5175	116309.1215	116159.9729	115997.9729	115849.4646	115701.9446	Conwy	117181	117247.5689	117228.7404	117158.5891	117039.0172	116844.992	116656.2512	116494.5175	116309.1215	116159.9729	115997.9729	115849.4646	115701.9446	
6	Denbighshire	95330	95318.85028	95197.73636	95013.06661	94781.0709	94491.66428	94109.82356	93638.85897	93150.89602	92637.26116	92122.2016	91617.2016	91117.2016	Denbighshire	95330	95318.85028	95197.73636	95013.06661	94781.0709	94491.66428	94109.82356	93638.85897	93150.					

Appendix 3 Paragraph 2 (e) Documents LDP Housing Requirement

Housing Requirement Statement (Matter 3) - by Tony Timmins - February 2020

Update to previous statement in response to WCBC LDP response to the Inspectors post hearing issues.

The council in their letter of 16 Dec 2019 to the Inspectors state that they *"are expecting a further significant reduction in the need for housing over the Plan period and beyond"*. Despite this they are maintaining the housing requirement at 8,525 dwellings over the plan period.

Section 4 of the Background Paper BP01b (Jan 2018) in the Evidence Base & Supporting Documents Library Para 4.1 (Page 22) states that WCBC have chosen the 10-year average migration variant projection as the basis for their growth forecasts. Table 5.1 (Page 25) shows a population growth of 12,800 (9.4%) over the plan period 2014 to 2028. If you convert this to dwelling requirements at 2.26 persons per household this will only require 5,664 dwellings.

In the Deposit plan the housing requirement was eventually amended from 11,715 dwellings to 8,525 dwellings, this despite many objections by the public and councillors that this number was still far too high and lacked evidence. These 8,525 dwellings equate to a population growth of approx. 19,267 persons over the plan period 2014 to 2028.

Wrexham's mid-year population in 2014 was 135,913 the 2018 population was recorded at 136,126 (the latest figure available); an increase of only 213 persons in 4 years. An update to this mid year estimate of population to include 2019 is due in June 2020. This is less than 10% of the 3,485 suggested by the migration led variant projection chosen for the LDP.

The statistical variant projection chosen by WCBC has the highest population estimates of those given in any category. This appears to have been chosen as an "economic development aspirational" choice, it supports a way population and household numbers would change "if" the average trends from 2004 to 2014 were to continue into the future. Recent population growth in Wrexham has clearly not followed this trend!

If you take the **Mid-Year Estimate** population growth in Wrexham from 2000 to 2018 and extrapolate it to 2028 the population figure is approx. **142,750** (see Excel chart in separate attachment). This is 6,460 lower than the 10 year migration led forecast of 149,210.

If you look at the figures in the **National Development Framework (NDF)** report the expected population of Wrexham in 2028 is forecasted to reach **141,346**. This figure is very similar to the mid-year forecast.

Looking at past **Wrexham Council Tax** statistics for the period 2008/09 through 2019/20 it is possible to forecast dwellings and population in Wrexham for 2028/29. The total dwellings (eligible + exempt) will be approx. 63,700 and with persons per household forecasted at 2.236 this equates to an approx. population of **142,433** persons.

Taking forward forecasts from **Mid-Year Population Estimates**, the **National Development Framework**, and **Wrexham Council Tax** the population of Wrexham in 2028 falls somewhere between 141,346 and 142,750. This is an increase in population from 2018 (136,126) of between 5,220 and 6,624. In dwelling terms this is 2,335 to 2,963 over 10 years.

A contingency of 10% should be added to the dwelling numbers to account for any unforeseen delays as stated in Paragraph 5.15 of BP01b (Jan 2018).

Appendix 3 Paragraph 2 (e) Documents LDP Housing Requirement

Housing Requirement Statement (Matter 3) - by Tony Timmins - February 2020

Update to previous statement in response to WCBC LDP response to the Inspectors post hearing issues.

Therefore, if we look at the population growth in Wrexham by taking an average of the growth forecasts discussed above (6,051) and assuming 2.26 persons per household, then adding a contingency of 10%, then the number of dwellings required over the 10 year period 2019-28 is 2,975 which is more realistic and achievable than the 10-year migration led projection adopted by Wrexham of 5,589.

These population growth forecasts have their issues and disadvantages, especially the 10yr average migration variant projections of dwellings. As can be seen in the LDP submission the council preferred option produces an over reliance on greenfield BMV land, a roll-back of the Green Wedge and the removal of Special Landscape Areas.

Looking at the councils housing land supply - Document BP08b Page 20: Table 19 Housing Land Supply in Years (2019-28) Updated April 2019 – the council already have a 5-year landbank of 3,471 dwellings. This indicates that there is no requirement to make additions to the existing number of dwellings

Taking population and housing trajectory information into account, together with existing land bank I can only come to the conclusion that the LDP is currently unsound. Wrexham CBC projections are very optimistic whereas the Welsh Government NDF projections, Council Tax forecasts and the Mid-Year Population estimates are pretty much the same. The council need to take a more credible forecasting approach if the LDP is to become sound.

In conclusion I would like to submit the following forecast chart which shows:

- An increasing population of retired folk in the over 64 age group
 - A different type of housing possibly required
- A decrease in population of working folk in the 16-64 age group
 - Smaller families (persons per household)
- A slow increase in employed persons
 - Almost in line statistically with the total population growth
- The 10-year Migration Led Variant population forecast
 - Totally out of kilter with the other statistics



Appendix 3 Paragraph 2 (e) Documents LDP Housing Requirement

Housing Requirement Statement (Matter 3) - by Tony Timmins - February 2020

Update to previous statement in response to WCBC LDP response to the Inspectors post hearing issues.

In summary, the total housing numbers in the councils preferred option cannot be justified in the current climate. Population growth and dwellings to house a growing population should be expected to meet demonstrable growth targets. In commensurate with the council's expectation of a significant reduction in the need for housing and a landbank of 3471 homes an increase in dwellings of 2,975 in the period 2019-28 seems a well-founded compromise, this would also prevent the irreversible losses of BMV land, Special Landscape Areas and Green Wedges.

All the statistics, charts and forecasting data used in this statement can be found in the accompanying Excel spreadsheet.

Prepared by

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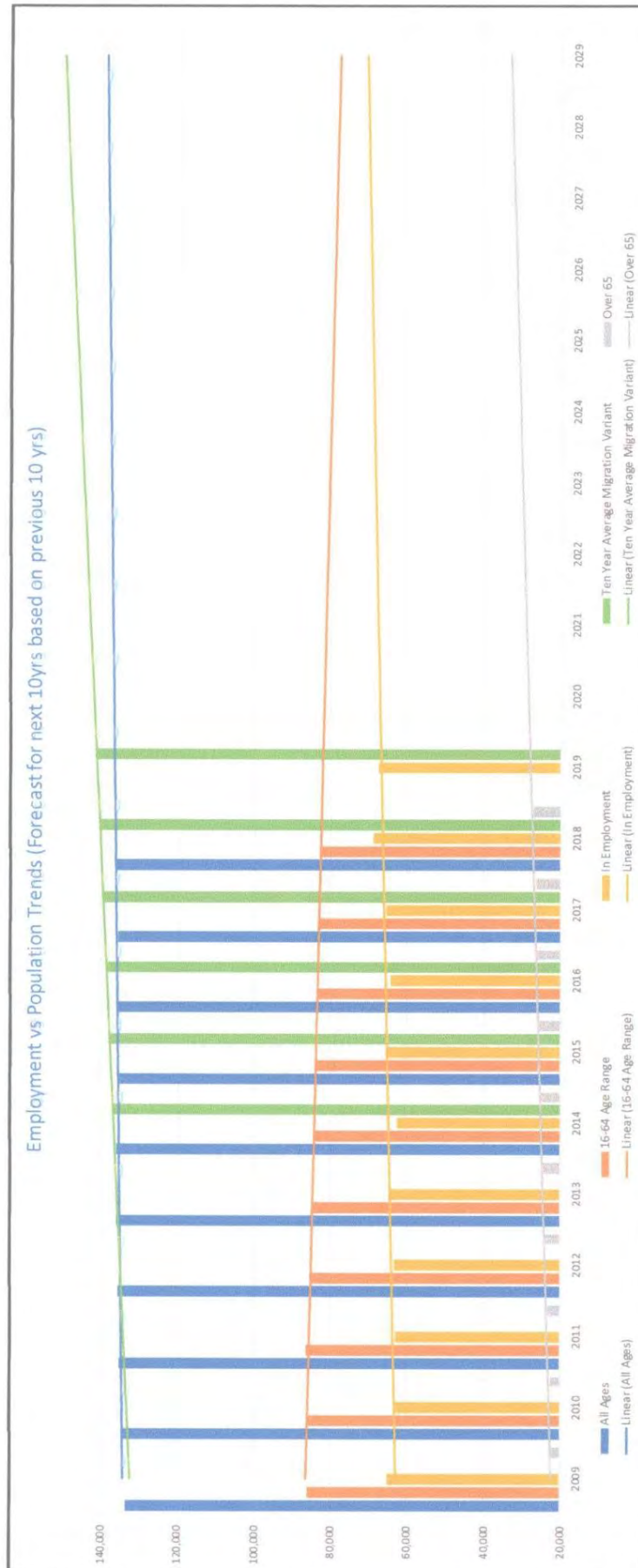
Footnote.

The spreadsheets supporting this document reference M.3.8.04a can be viewed by following the WCBC LDP Link:

https://wrexham-consult.objective.co.uk/portal/examination_agendas_and_statements

Matter 3. The graph overleaf is that attached to LDP Submission M.3.8.04

Appendix 3 Paragraph 2 (e) Documents LDP Housing Requirement





Wrexham Local Development Plan 2013 - 2028

BP 08b

housing

open space

employment

community

transport

education



Housing Supply
and Delivery
Tables Only
(August 2019)

This is an update to **Background Paper 08a**.

Following a request made by the Planning Inspectors on 16 August 2019, this is a health check of the Housing Trajectory which takes account of new evidence that has come to light since January 2018.

All of the tables and the Housing Trajectory have been updated to reflect the last two years of housing monitoring data collection for 1st April 2018 and 1st April 2019.

In addition, Table 4 includes 735 units which have been granted planning permission since 1st April 2019 on large windfall sites (See Appendix 2 of the Council's response to Matter 3 - M3.01). When added to the total provision, this more than meets the Plan requirement of 7750 and the Plan provision of 8525. Since 1st August 2019, 53 apartments (P/2018/0684) have been allowed on appeal.

It also includes Housing Allocation Delivery Reports as agreed with agents and landowners (Appendix D).

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Table 4 – Updated LDP Housing Components (2013 – 2028)

Components	Sub-components	No. of dwellings
Sites	Completed Sites (2013-2019)	1561
	Committed Deliverable Large Sites over remaining plan period (2019)	1209
	S106 Sites	16
	LDP Allocations deliverable within the plan period	3366
	Sub-total	6152
Allowances	Large Windfall Sites (120 X 9)	1080
	Small Windfall Sites (75 X 9)	675
	Sub-total	1755
Total provision		7907
Plus windfalls granted or pending S106 on Large Sites since 1st April 2019 (735) and large windfalls granted on appeal (53)		8695

Note: Since 1st April 2019, 735 units have been granted planning permission on large windfall sites (See Appendix 2 of the Council's response to Matter 3 - M3.01), which when added to the total provision, more than meets the requirement of 7750 and the Plan provision of 8525. Since 1st August 2019, 53 apartments (P/2018/0684) have been allowed on appeal.

Table 4a – LDP Housing Components by Settlement Tier (2013 – 2028)
April 2019

Components of Housing Supply		Tier 1	Tier 2	Tier 3	Tier 4	Tier 5	Other	Total
A	Total Completions (Small and Large) 1 st April 2013 to 31 st March 2019	694	338	407	96	20	6	1561
B	Commitments 1 st April 2019 (Deliverable over remaining plan period)	50	817	342	0	0	0	1209
C	S106 at April 2019	11	5	0	0	0	0	16
D	Housing Allocations	2180	748	359	79	0	0	3366
E*	Large Windfall (120 pa X 9)*	409	404	234	20	13	0	1080
F*	Small Windfall (75 pa X 9)*	152	236	164	93	20	10	675
G	TOTAL Housing Provision	3496	2548	1506	288	53	16	
H	Overall Total	7907						

*The windfalls have been apportioned in line with the past windfall completion rates by Settlement Tier for the period 2009-2019 rounded to Zero DP.

Table 5 – Updated Breakdown of Completions 2013 – 2019

Completions	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	TOTAL
Large	151	160	132	232	119	291	1085
Small	64	75	67	96	103	71	476
Brownfield	188	218	171	295	167	247	1286
Greenfield	27	17	28	33	55	115	275
Within Settlement	203	220	164	292	165	307	1351
Outside Settlement	12	15	35	36	57	55	210
UDP allocated	97	50	31	165	41	25	409
Windfall	118	185	168	163	181	337	1152
TOTAL	215	235	199	328	222	362	1561

Table 6 – Updated Committed Large Sites 1st April 2019

Table 6 - Updated Committed Large Sites - April 2019				
Tier	Settlement	Site Address	Total Not Started or Under Construction 1 st April 2019	Status
1	Wrexham Town	Former Ebeneser Chapel, Chester Street, ACTON , Wrexham	23	Full Permission
		Former Depot, Crescent Road, Wrexham CAIA PARK	13	UDP Allocation 13
		Rivulet Road (Adj N Wales Motorcycles) CAIA PARK	24	Under Construction
		CK1, 32 TO 36 Bridge Street, OFFA , Wrexham	10	Full Permission
		Bridge St / Cambrian Yard, OFFA , Wrexham	25	UDP Housing Allocation
		Western Gateway, Ruthin Road, OFFA , Wrexham	40	Outline Permission
		Trinity House, Trinity Street, RHOSDDU , Wrexham	21	Full Permission
		Regent House, Regent Street, Wrexham	27	Full Permission
		Sub Total		
2	Acrefair/Cefn	Land at Cae Ann	19	Under

Tier	Settlement	Site Address	Total Not Started or Under Construction 1 st April 2019	Status
	Mawr	Dolydd, Cefn		Construction
		Former Air Products Site, Llangollen Road, Acrefair	232	Outline Permission
		Park Road, Rhosymedre	30	Under Construction
	Chirk	Land off Sycamore Drive, Chirk	85	Technical Start
		North of Station Avenue, Chirk	24	Outline Permission
	Gresford/Marford	Bryn y Groes, Chester Road, Gresford	26	26 Under Construction 4 Not Started
		Old Caravan Site, Old Wrexham Road, Gresford	11	Full Permission
	Gwersyllt	Westminster Industrial Estate, Mold Road, Gwersyllt	30	Outline Permission
		Boozey Field, Mold Road, Gwersyllt	36	26 Under Construction 10 Not Started
	Llay	South of Miners Welfare Institute, Llay New Road, Llay	18	Reserved Matters
		Home Farm, Gresford Road, Llay (LDP H10)	362	Reserved Matters
	Rhos/Johnstown	Moreton Depot, Moreton Ave, Johnstown	6	8 Complete 6 Not started
		Former ysgol Y Wern, Hill Street, Rhos	11	Full Permission
		North Road, Ponciau	23	Outline Permission
		WCBC Car Park and Land adjoining Bonc Wen, Ponciau	11	Full Permission
		Former Hafod Tileries, Hafod Road/Bangor Road, Johnstown	300	Outline Permission
	Ruabon	Wynnstay Hall (all applications), Ruabon	7	Full Permission
		Ruabon Business Park, Ruabon	319	Outline Permission
		Pont Adam Crescent Ruabon	1	Under Construction
		Wynnstay Technology	35	Outline

Tier	Settlement	Site Address	Total Not Started or Under Construction 1 st April 2019	Status
		Park, Llangollen Road, Ruabon		Permission
Sub Total			1586	
3	Broughton	Land at School Lane, Southsea	8	4 Under Construction 4 Not started
	Brymbo	Land off Blast Road, Brymbo	17	Full Permission
		Opposite Bryn Gwenfro, Tanyfron	70	Outline Permission
	Holt	Wrexham Road, Holt	24	Outline Permission
	Rhostyllen	Wrexham Rd, Rhostyllen	223	Legal Commencement
Sub Total			342	
TOTAL			2111	
Subtract Allocated Site H10 LIAY 362			1749	

Table 7 – Updated No. Units unlikely to be delivered on large Committed Sites by 2028 1st April 2019

Tier	Settlement	Address	No. units unlikely to be built or delivered by 2028	Reasons
1	Wrexham Town	Former Depot, Crescent Rd Wrexham	13	Council owned site allocated for development in UDP but unlikely to be developed for some years as currently provides long stay parking.
		Rivulet Rd. (adj. to N Wales Motorcycles)	24	Site has pp and groundworks commenced but abandoned. Unable to locate owners.
		Bridge St / Cambrian Yard, OFFA , Wrexham	25	UDP Housing Allocation – unlikely

Tier	Settlement	Address	No. units unlikely to be built or delivered by 2028	Reasons
				to be delivered over Plan period.
		Western Gateway, Ruthin Road, OFFA , Wrexham	40	Outline Permission - unlikely to be delivered over Plan period.
		CK1, 32 TO 36 Bridge Street, OFFA , Wrexham	10	Unlikely to be delivered.
		Trinity House, Trinity Street, RHOSDDU , Wrexham	21	Unlikely to be delivered over Plan period.
Sub Total			133	
2	Acrefair/Cefn Mawr	Land at Cae Ann Dolydd, Cefn	19	Site commenced with 1 dwelling complete. Remainder abandoned.
	Chirk	Land off Sycamore Drive, Chirk	85	Sloping site has longstanding pp. (1976). A 1976 permission commenced with groundworks but no further work .New application for revised layout refused & dismissed on appeal in 2015. Site has been marketed. But is unlikely to come forward over the LDP period.
	Rhos/Johnstown	Former Ysgol Y Wern, Hill Street, Rhos	3	Developer advises remaining 3 units unlikely to be built due to ground issues.
		Former Hafod Tileries, Hafod Road/Bangor Road, Johnstown	300	Unlikely to be delivered over Plan

Tier	Settlement	Address	No. units unlikely to be built or delivered by 2028	Reasons
				period.
Sub Total			407	
TOTAL			540	

Table 7a – Overall Total of Committed Sites Deliverable over Plan Period April 2019

Total Commitments April 2019	Total Commitments Unlikely to be delivered over Plan Period April 2019	Overall Contribution of Committed Sites over Plan Period
1749	540	1209

Table 8 – Updated LDP Housing Allocations (2013 – 2028) May 2019

Tier	Settlement	Ref no.	Location	Total No. Units Plan Period	Area (ha)	dph	No. units to be delivered beyond Plan Period
1	Wrexham	KSS1 (WR20CS)	Lower Berse Farm, Ruthin Road	200	68.65	22	1300
		KSS2 (WR04AS) & (WR19CS (a))	Land East of Cefn Road, Wrexham	1580	92.3	18	100
		H1 (WR03AS)	Mold Road/A483	375	21.67	17	0
		H2 (WXT019UCS)	Jacques Scrapyard, Wrexham	25	0.57	44	0
		H3 (WXT092NUCS)	Crown Buildings, Chester Road, Wrexham	0	0	0	0
	Total			2180	183.19	12	1400
2	Acrefair/ Cefn Mawr	H4 (A04CS)	Rhosymedre Infant Site, Off Hampden Way, Rhosymedre	0	0	0	0
		H5 (A10CS)	Land Opposite Former Ruabon Works, Queen	51	1.44	35	0

Tier	Settlement	Ref no.	Location	Total No. Units Plan Period	Area (ha)	dph	No. units to be delivered beyond Plan Period
			Street, Cefn Mawr				
	Chirk	H6 (CH02OS)	Land off B5070, Chirk	180	5.97	30	0
	Gwersyllt	H7 (GWE06CS)	Stansty Fields, Stansty, Gwersyllt	96	3.21	30	0
		H8 (GWER003UCS)	Mold Road, Gwersyllt	8	1.04	8	0
	Llay	H9 (LLAY001UCS)	British Legion, Llay	51	2.04	25	0
		H10 (LL06AS) (P/2014/0905)	Land at Home Farm, Llay	362	15.62	23	0
	Total			748	29.32	26	0
3	Broughton	H11 (BRO01OS)	Land South of Berse Road, Caego	25	1.70	15	0
		H12 (BRO06CS)	Land at Gatewen Road, New Broughton	112	4.94	23	0
	Holt	H13 (HOL07CS)	Land Adjacent Sycamore House, Wrexham Road, Holt	35	1.72	20	0
	Overton	H14 (O02OS/O07OS)	Land off St Mary's Avenue, Overton	40 ¹	1.95	21	0
	Penley	H15 (PENL01CS)	Land at The Grange, Penley	15	0.66	23	0
	Rossett/Lavister	H16 (RO04AS & R02OS)	Land North & South, Rossett Road, Rossett	132	6.26	21	0
	Total			359	17.23	21	0
4	Rhosrobin	H17 (RR001AS)	Land at Llay New Road, Rhosrobin	79	3.24	24	0

¹ Note the developers have since indicated that they intend to build 45 dwellings on this site. This will need to be addressed during the examination.

Tier	Settlement	Ref no.	Location	Total No. Units Plan Period	Area (ha)	dph	No. units to be delivered beyond Plan Period
	Total			79	3.24	24	0
Overall Total				3366	232.98	14	1400

Table 9 - Units unlikely to be delivered on Allocated Housing Sites by 2028 and Beyond - May 2019

Tier	Settlement Ref	Address	Reasons	No. units unlikely to be delivered by 2028	No. units unlikely to be delivered
1	Wrexham				
	KSS1 (WR20CS)	Land at Lower Berse Farm, Ruthin Road, Wrexham	Need for highway improvements will limit number of dwellings able to be constructed within Plan period.	1300	0
	KSS2 (WR19CS(a))	Land east of Cefn Road, Wrexham	Large site unlikely to be completed within Plan period based on information from developer.	100	0
	H2 (WXT019UCS)	Jacques Scrapyard, Wrexham	Full planning application currently pending which reduces the total number of dwellings by 11 from 36 to 25.	0	11
	H3 (WXT092NUCS)	Crown Buildings, Chester Road, Wrexham	No longer available – WCBC now plans to retain for Office Accommodation.	0	71
2	H4 (A04CS)	Rhosymedre Infants Site, Hampden Way, Acrefair/Cefn Mawr	Now within C2 Flood	0	22

Tier	Settlement Ref	Address	Reasons	No. units unlikely to be delivered by 2028	No. units unlikely to be delivered
	H8 (GWER003UCS)	Mold Road, Gwersyllt	Site in split ownership. Owner of part of site has confirmed that the land will not be developed resulting in a loss of 7 dwellings.	0	7
	H9 (LLAY001UCS)	British Legion, Llay	Application reduces total number of dwellings by 9 from 60 to 51.	0	9
	H10 (LL06AS) (P/2014/0905)	Land at Home Farm, Llay	Application reduces total number of dwellings by 3 from 365 to 362.	0	3
3	H12 (BRO06CS)	Land at Gatewen Road, New Broughton	Outline application reduces number of dwellings by 15 from 127 to 112.	0	15
	H15 (PENL01CS)	Land at The Grange, Penley	Application reduces total number of dwellings by 10 from 25 to 15.	0	10
	H16 (RO04AS & R02OS)	Land North & South, Rossett Road, Rossett	Application reduces total number of dwellings by 5 from 137 to 132.	0	5
TOTAL				1400	153

Table 10 Windfall Contributions 2001-2019

Year	Total No. of Units Complete	Total No. of Windfall Units Complete			% Total Windfall
		Total	L	S	
April 01 – March 02	515	232	80	152	45

Year	Total No. of Units Complete	Total No. of Windfall Units Complete			% Total Windfall
		Total	L	S	
April 02 – March 03	351	182	87	95	52
April 03 – March 04	431	262	111	151	61
April 04 – March 05	381	291	123	168	76
April 05 – March 06	438	342	208	134	78
April 06 – March 07	945	587	392	195	62
April 07 – March 08	606	508	392	116	84
April 08 – March 09	453	385	210	175	85
April 09 – March 10	243	217	112	105	89
April 10 – March 11	305	219	125	94	72
April 11 – March 12	433	327	250	77	76
April 12 – March 13	239	148	84	64	62
April 13 – March 14	215	118	54	64	55
April 14 – March 15	235	185	110	75	79
April 15 – March 16	199	168	101	67	84
April 16 – March 17	328	163	71	92	50
April 17 – March 18	222	181	80	101	82
April 18 – March 19	362	337	266	71	93
Total 01-19	6901	4852	2856	1996	70%

Table 10a Windfall Completions by Settlement Tier 2001-2019

Year	Tier 1		Tier 2		Tier 3		Tier 4		Tier 5		Other		Total
	S	L	S	L	S	L	S	L	S	L	S	L	
April 01 - March 02	12	40	45	26	28	3	45	11	22	0	0	0	232
April 02 - March 03	16	34	34	36	21	1	20	13	3	3	1	0	182
April 03 - March 04	24	0	37	63	34	46	28	1	13	1	15	0	262
April 04 - March 05	24	13	55	68	45	16	39	13	4	13	1	0	291
April 05 - March 06	10	140	65	56	37	0	12	10	6	2	4	0	342
April 06 - March 07	45	91	63	72	59	217	23	0	3	12	2	0	587
April 07 - March 08	11	70	53	145	29	177	16	0	6	0	1	0	508
April 08 - March 09	35	57	66	52	43	101	28	0	2	0	1	0	385
April 09 - March 10	30	14	41	62	26	26	8	10	0	0	0	0	217
April 10 - March 11	14	30	37	32	19	63	14	0	4	0	6	0	219
April 11 - March 12	20	38	37	163	14	49	4	0	2	0	0	0	327
April 12 - March 13	3	4	27	47	23	33	7	0	4	0	0	0	148
April 13 - March 14	14	10	11	16	23	22	15	6	1	0	0	0	118
April 14 - March 15	24	67	24	12	22	30	5	1	0	0	0	0	185
April 15 - March 16	16	43	23	21	7	22	19	6	2	9	0	0	168
April 16 - March 17	5	29	40	29	26	7	15	0	5	6	1	0	163
April 17 – March 18	32	55	14	24	24	1	22	0	5	0	4	0	181
April 18 – March 19	24	184	29	63	13	19	3	0	1	0	1	0	337
Total 01-19	359	919	701	987	493	833	323	71	83	46	37	0	4852

Table 11 – 5, 10 and 15 year windfall averages and percentages 2013 – 2019

Year	Total No. of Units Complete	Total No. of Windfall Units Complete			% Windfalls			Windfall Averages			Years
		Total	L	S	Total	L	S	Total	L	S	
April 14 - March 19	1346	1034	628	406	77	61	39	207	126	81	5
April 09 - March 19	2781	2063	1253	810	74	61	39	206	125	81	10
April 04 - March 19	5604	4176	2578	1598	75	62	38	278	172	107	15

Table 12 - Committed Small Sites 1st April 2019

Tier	Settlement	Total Under Construction 1st April 2019	Total Not Started 1st April 2019
1	Wrexham Town	29	97
2	Acrefair/Cefn Mawr	14	22
	Chirk	1	14
	Coedpoeth	2	13
	Gresford/Marford	1	6
	Gwersyllt	0	16
	Llay	1	12
	Rhos/Johnstown	16	28
	Ruabon	9	3
3	Bangor	1	1
	Broughton	4	15
	Brymbo	2	23
	Glyn Ceiriog	2	1
	Holt	4	13
	Overton	3	4
	Penley	16	13
	Penycae	5	2
	Rhostyllen	0	5
	Rossett	3	8
4	Bersham	0	2
	Bradley	1	0
	Bronington	5	2
	Bwlchgwyn	1	3
	Hanmer	0	7
	Marchwiel	0	3
	Minera	0	8

Tier	Settlement	Total Under Construction 1st April 2019	Total Not Started 1st April 2019
	Pentre	0	2
	Pontfadog	0	6
	Tanyfron/Fron	0	2
5	Bettisfield	1	9
	Cross Lanes	0	7
	Dolywern/Llwynmawr	2	0
	Garth	0	6
	Gwynfryn	1	1
	Horseman's Green	1	2
	New Brighton	1	1
	Sydallt	0	1
	Tallarn Green	1	2
	Worthenbury	1	2
NA	Pentre Maelor/Wrexham Industrial Estate	2	2
Sub Total		130	364
TOTAL		494	

Table 13 – Updated Potential Sources of Windfall from the Sites Assessment Process Checked August 2019 (See Appendix A)

Category		Tier					Total
		1	2	3	4	5	
Small Sites	UCS	10	66	14	18	0	108
	CS	0	10	0	12	0	22
	AS	0	0	0	0	0	0
Total		10	76	14	30	0	130
Large Sites	UCS	14	84	0	0	0	98
	CS	0	24	20	0	0	44
	OS	0	0	0	12	0	12
Total		14	108	20	12	0	154
Overall Total		24	184	34	42	0	284

Table 14 Updated Historic Trends – Average Windfall Completions (April 2019)

Average	Small	Large	Total	Total x 9 ²
Last 15 Years	107	172	278	2502
Last 10 Years	81	125	206	1854
Last 5 Years	81	126	207	1863

Table 15 Updated Potential Sources of Known Windfalls (2019)

Source of Supply	No. of Potential Units
Small Site Commitments 1 st April 2019	494
Potential from Site Assessments (Small)	130
Potential from Site Assessments (Large)	154
Total	778

Table 16 Windfall Allowance April 2019

Components	Sub-components	No. of dwellings
Allowances	Large Windfall Sites ³	1080
	Small Windfall Sites ⁴	675
Allowances Total		1755

Table 17 Updated Components of the Housing Supply: Summary and Sources of Evidence

Components	Sub-components	Source of Evidence	Deliverable no. of Dwellings
Sites	Completed Sites (2013-2019)	Housing Monitoring 2013-2019	1561
	Committed Large Sites (2019) ⁵	Housing Monitoring April 2019 and	1209

2 9 = remaining years of LDP.

3 Based on an allowance of 120 pa multiplied by the remaining plan period – 9 years.

4 Based on an allowance of 75 pa multiplied by the remaining plan period – 9 years.

5 Total number of units on large sites as at 1st April 2019 which have permission or are under construction and are deliverable over the plan period.

Components	Sub-components	Source of Evidence	Deliverable no. of Dwellings
		Housing Trajectory (see Tables 6, 7, 7a and Appendix B Revised)	
	S106 Sites	Housing Monitoring April 2019 and Housing Trajectory (see Tables 6, 7, 7a and Appendix B Revised)	16
	LDP Allocations	Site Assessment Process and Housing Trajectory(see Tables 8, 9 and Appendix B)	3366
	Sub-total		6152
Windfalls	Large Windfall Sites ⁶	Known Sites (Site Assessment process of Large Sites – see Table 13 and Appendix A)	154
		Unknown Sites (Past and expected windfall trends – see Tables 10, 10a, 11 and 14)	926
	Small Windfall Sites ⁷	Known Sites (Committed small sites - Housing Monitoring April 2019 – see Table	494 ⁸

6 Based on an allowance of 120 pa multiplied by the remaining plan period – 9 years = 1080.

7 Based on an allowance of 75 pa multiplied by the remaining plan period – 9 years = 675.

8 It is acknowledged that not all of these sites will be delivered over the plan period, however, they are known sites with permission.

Components	Sub-components	Source of Evidence	Deliverable no. of Dwellings
		12)	
		Known Sites (Site Assessment Small Sites – see Table 13 and Appendix A)	130
		Unknown Windfalls (Past and expected windfall trends – 10, 10a, 11 and 14)	51
	Sub-total		1755
TOTAL SUPPLY			7907

Table 18 – Updated Summary Housing Trajectory April 2019

Source of Supply	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	TOTAL UNITS 2013-2028
Housing Requirement	517	517	517	517	517	517	517	517	517	517	516	516	516	516	516	7750
LDP Allocations	0	0	0	0	0	0	75	291	486	575	522	330	315	420	352	3366
Commitments	0	0	0	0	0	0	115	244	141	123	153	145	122	83	83	1209
S106 Sites	0	0	0	0	0	0	0	0	0	16	0	0	0	0	0	16
Large Windfalls	0	0	0	0	0	0	120	120	120	120	120	120	120	120	120	1080
Small Windfalls	0	0	0	0	0	0	75	75	75	75	75	75	75	75	75	675
Actual Completions	215	235	199	328	222	362										1561
Anticipated completions	0	0	0	0	0	0	385	730	822	909	870	670	632	698	630	6346
TOTAL																7907
Note: As the total plan requirement does not divide equally between 15, the first 10 years of the plan have an annual requirement of 517 dwellings, whilst the last 5 years have an annual requirement of 516 dwellings.																

Chart 2 – Updated Housing Trajectory April 2019

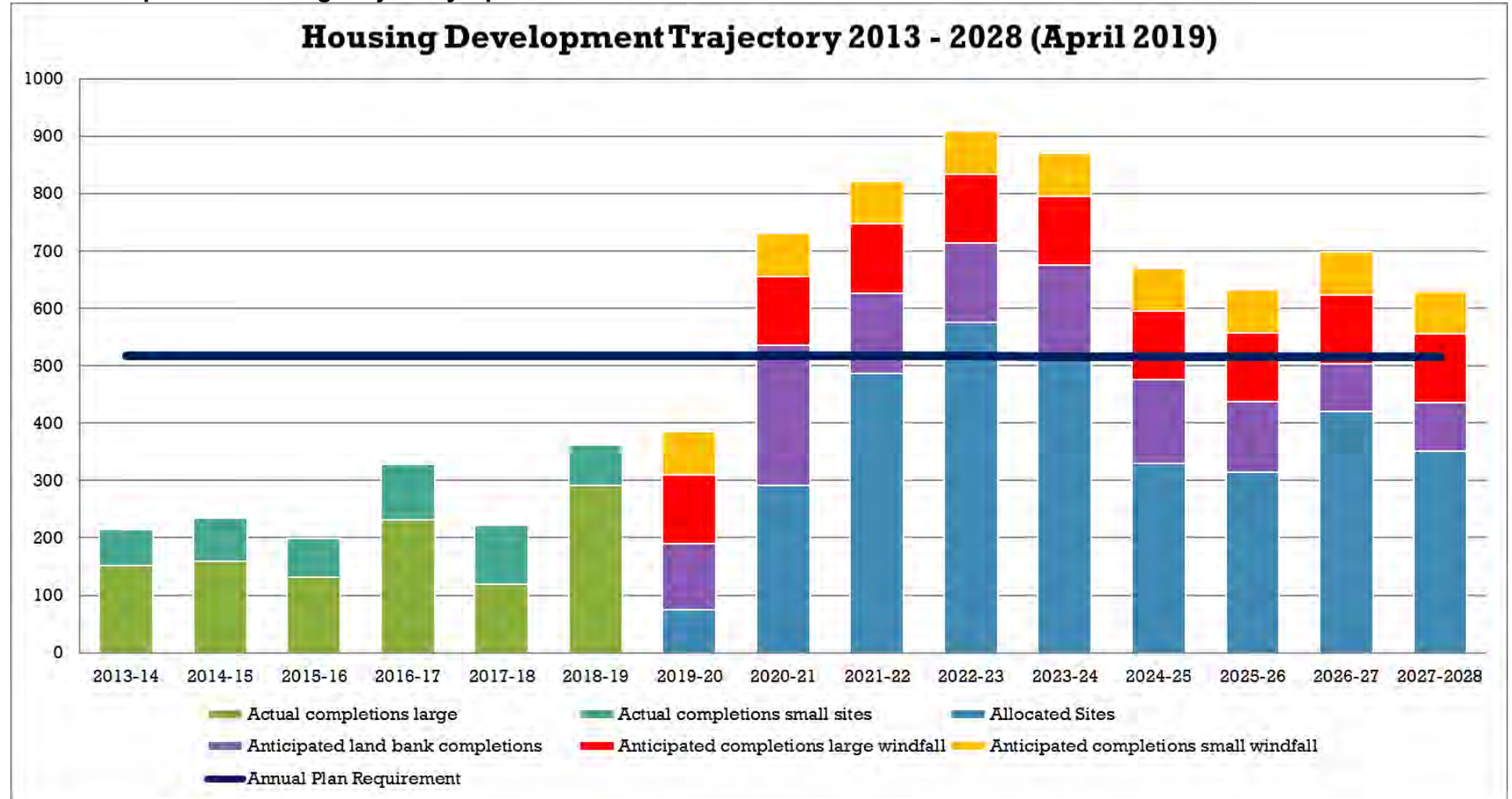


Table 19 – Housing Land Supply in Years (2019 – 2028) Updated April 2019

Year	A 5 Year Housing Requirement*	B Annual Requirement (A/5)	C Total no. dwellings to be built within 5 years*	D Land Supply in Years (C/B)
2019	3471	694	3716	5
2020	3688	738	4001	5
2021	3746	749	3903	5
2022	3753	751	3779	5
2023	3686	737	3500	5
2024	3419	684	3025	4
2025	3332	666	2650	4
2026	3279	656	2313	4
2027	3167	633	1910	3
2028-	3116	623	1575	3

****See Appendix C for these figures***

Appendix A – Update to Potential Windfalls from Site Assessment Process (August 2019)

Site Ref	Site Type	Settlement	Tier	Approx Developable Area (Ha)	Windfall units	Small/ Large	Amend Settlement Limit	App No.	Type	Decision Date	No. units	Resulting No. Units	Total by Settlement	Total by Tier	Notes
SMALL SITES															
WXT012UCS	UCS	Wrexham	1	0.34-0.13	5 2	Small	No	NA	NA	NA	NA	2	10	10	Southern part of site, protected open green space 160 (WRA58). Reduces area to 0.13
WXT023UCS	UCS	Wrexham	1	0.26	7	Small	No	P/2017/0167	F	Granted 11th May 2017	6	0			14 bed care home and block of self contained 6, 1 bed flats.
WXT070NUCS	UCS	Wrexham	1	0.5	8	Small	No	P/2015/0579	O	Granted 7th Sept 2015	8	8			Application Expired 7th Sept 2018
WXT071NUCS	UCS	Wrexham	1	0.09	1	Small	No	P/2015/0587	F	Granted 3rd Sept 2015	1	0			Dwelling now complete
CEFN005UCS	UCS	Acrefair/ Cefn Mawr	2	0.1	3	Small	No	NA	NA	NA	NA	3	12	76	
CEFN009UCS	UCS	Acrefair/ Cefn Mawr	2	0.5	5	Small	No	P/2015/0576	O	Granted 7th Sept 2015	5	5			Application Expired 7th Sept 2018
CEFN013NUCS	UCS	Acrefair/ Cefn Mawr	2	0.13	4	Small	No	P/2014/0187	F	Refused 15th May 2014	4	4			Refused due to lack of information about ground levels and inadequate parking provision. Could be resolved.
CHIR004UCS	UCS	Chirk	2	0	6	Small	No	NA	NA	NA	NA	6	15		
CHIR005UCS	UCS	Chirk	2	0.18	3	Small	No	P/2018/0056	O	Granted 3rd April 2018	8	0			

Site Ref	Site Type	Settlement	Tier	Approx Developable Area (Ha)	Windfall units	Small/ Large	Amend Settlement Limit	App No.	Type	Decision Date	No. units	Resulting No. Units	Total by Settlement	Total by Tier	Notes
CHIR010UCS	UCS	Chirk	2	0.29	9	Small	No	P/2017/0459	O	Granted 7th Sept 2017	9	0			
CHIR013UCS	UCS	Chirk	2	0.2 0.14	6	Small	No	P/2018/0225	F	Granted 27th April 2018	0	3			Reduces area for development to approximately 0.14ha and potential no. of dwellings to approx 3.
CH01CS	CS	Chirk	2	0.061	6	Small	No	NA	NA	NA	NA	6			
GRE11CS	CS	Gresford/ Marford	2	0.47	4	Small	No -Yes	NA	NA	NA	NA	0	6		Settlement has been revised here without accounting for this site assessment
GRES006UCS	UCS	Gresford/ Marford	2	0.6	4	Small	No	NA	NA	NA	NA	4			
GRES008UCS	UCS	Gresford/ Marford	2	0.14	2	Small	No	NA	NA	NA	NA	2			
GRE12CS	CS	Gresford/ Marford	2	0.2	7	Small	Yes	NA	NA	NA	NA	0			Settlement has been revised in wrong direction here without accounting for this site assessment
GWE09CS	CS	Gwersyllt	2	0.32	4	Small	No	NA	NA	NA	NA	4	4		
LL002AS	AS	Llay	2	0.15	5	Small	No	P/2017/0859	F	Granted 27th March 2018	6	0	0		Will be accounted for in the Housing Monitoring, hence 0 for resulting numbers.
LLAY002NUCS	UCS	Llay	2	0.02	2	Small	No	P/2018/0022	F	16th March 2018	4	0			Not yet built, but included in Housing Monitoring hence 0 for resulting numbers.
LLAY003NUCS	UCS	Llay	2	0.75	7	Small	No	NA	NA	NA	NA	0			Protected Open Space

Site Ref	Site Type	Settlement	Tier	Approx Developable Area (Ha)	Windfall units	Small/ Large	Amend Settlement Limit	App No.	Type	Decision Date	No. units	Resulting No. Units	Total by Settlement	Total by Tier	Notes
JOHN002UCS	UCS	Rhos/ Johnstown	2	0.5	8	Small	No	NA	NA	NA	NA	0	39		Not available for development. Only bit considered potentially suitable received a Response at LDP Deposit stage setting out that it wasn't available. LDP1904
JOHN003UCS	UCS	Rhos/ Johnstown	2	0.2 0.17	6	Small	No	NA	NA	NA	NA	6			Area available for development appears to be 0.17, but still potential for 6 dwellings. Application P/2014/0258 shows garden curtilage of adjacent property forming part of this land.
JOHN006UCS	UCS	Rhos/ Johnstown	2	0.11	3	Small	No	NA	NA	NA	NA	3			
JOHN007UCS	UCS	Rhos/ Johnstown	2	0.13	9	Small	No	NA	NA	NA	NA	9			
JOHN009UCS	UCS	Rhos/ Johnstown	2	0.11	4	Small	No	NA	NA	NA	NA	4			Application of small part of site to be redeveloped. Remaining area looks like part of it is a service yard. Although still appears to be scope for small scale infill development.

Site Ref	Site Type	Settlement	Tier	Approx Developable Area (Ha)	Windfall units	Small/ Large	Amend Settlement Limit	App No.	Type	Decision Date	No. units	Resulting No. Units	Total by Settlement	Total by Tier	Notes
JOHN015UCS	UCS	Rhos/ Johnstown	2	0.18	3	Small	No	P/2014/0833	F	Withdrawn	3	3			Application was withdrawn due to some issues that needed resolving. Likely that these can be resolved.
JOHN016UCS	UCS	Rhos/ Johnstown	2	0.14	4	Small	No	NA	NA	NA	NA	4			
JOHN021UCS	UCS	Rhos/ Johnstown	2	0.29	9	Small	No	P/2015/0915	F	Granted 1st Feb 2016	11	0			Not yet built, but included in Housing Monitoring hence 0 for resulting numbers.
JOHN023UCS	UCS	Rhos/ Johnstown	2	0	2	Small	No	NA	NA	NA	NA	2			
JOHN026NUCS	UCS	Rhos/ Johnstown	2	0.21	8	Small	No	NA	NA	NA	NA	8			
BROU002UCS	UCS	Broughton	3	0.31	3	Small	No	NA	NA	NA	NA	3	3	14	
BRYM001UCS	UCS	Brymbo	3	0.14	5	Small	No	NA	NA	NA	NA	5	5		
GLYN004UCS	UCS	Glyn Ceiriog	3	0.21	4	Small	No	NA	NA	NA	NA	4	4		
PENL03CS	CS	Penley	3	0.16	3	Small	Yes	P/2018/0348	RM	Granted 27th June 2018	5	0	0		Will be accounted for in the Housing Monitoring.
RHOS004UCS	UCS	Rhostyllen	3	0.08	2	Small	No	NA	NA	NA	NA	2	2		
BW02CS	CS	Bwlchgwyn	4	1.4	7	Small	No	NA	NA	NA	NA	7	10	30	
BWLC001UCS	UCS	Bwlchgwyn	4	0.1	1	Small	No	NA	NA	NA	NA	1			
BWLC002UCS	UCS	Bwlchgwyn	4	0.15	2	Small	No	NA	NA	NA	NA	2			
HAN03CS	CS	Hanmer	4	0.08	1	Small	No	NA	NA	NA	NA	1	4		
HANM003UCS	UCS	Hanmer	4	0.15	3	Small	No	NA	NA	NA	NA	3			
MA01CS	CS	Marchwiel	4	1.35	4	Small	No	NA	NA	NA	NA	4	4		

Site Ref	Site Type	Settlement	Tier	Approx Developable Area (Ha)	Windfall units	Small/ Large	Amend Settlement Limit	App No.	Type	Decision Date	No. units	Resulting No. Units	Total by Settlement	Total by Tier	Notes
SOUT001UCS	UCS	Southsea	4	0.27	4	Small	No	NA	NA	NA	NA	4	4		
TREV002UCS	UCS	Trevor	4	0.15	3	Small	No	NA	NA	NA	NA	3	8		
TREV003UCS	UCS	Trevor	4	0.38	5	Small	No	NA	NA	NA	NA	5			
TOTAL													130	130	
LARGE SITES															
WXT074NUCS	UCS	Wrexham	1	0.15	14	Large	No	NA	NA	NA	NA	14	14	14	
CHIR007UCS	UCS	Chirk	2	1.09	30	Large	No	NA	NA	NA	NA	30	30	108	
CHIR009UCS	UCS	Chirk	2	0	22	Large	No	P/2016/1165	O	3rd July 2018	22	0			Appeal allowed for the majority of the site.
GWE02CS	CS	Gwersyllt	2	0.71	24	Large	Yes	NA	NA	NA	NA	24	24		
JOHN001UCS	UCS	Rhos/ Johnstown	2	0.37	10	Large	No	NA	NA	NA	NA	10	54		
JOHN014UCS	UCS	Rhos/ Johnstown	2	0.94	28	Large	No	NA	NA	NA	NA	28			
JOHN029NUCS	UCS	Rhos/ Johnstown	2	0.32	16	Large	No	NA	NA	NA	NA	16			
BRO08CS	CS	Broughton	3	4.14	20	Large	No??	NA	NA	NA	NA	20	20	20	
MA05OS	OS	Marchwiel	4	0.73	12	Large	No Yes	NA	NA	NA	NA	12	12	12	Settlement Boundary change proposed as part of FC/MEC
TOTAL													154	154	

NOTE: Planning Permission data updated August 2019

OVERALL TOTAL	284
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Summary by Settlement of Potential Windfalls from Site Assessment Process

Settlement	Tier	Large	Small	Total
Wrexham	1	14	10	24
Acrefair/Cefn Mawr	2		12	12
Chirk	2	30	15	45
Gresford/Marford	2		6	6
Gwersyllt	2	24	4	28
Llay	2		0	
Rhos/Johnstown	2	54	39	93
Broughton	3	20	3	23
Brymbo	3		5	5
Glyn Ceiriog	3		4	4
Penley	3		0	
Rhostyllen	3		2	2
Bwlchgwyn	4		10	10
Hanmer	4		4	4
Marchwiel	4	12	4	16
Southsea	4		4	4
Trevor	4		8	8
Total		154	130	284

Summary by Tier of Potential Windfalls from Site Assessment Process

Tier	Large	Small	Total
1	14	10	24
2	108	76	184
3	20	14	34
4	12	30	42
Total	154	130	284

Appendix B – Updated Detailed Housing Trajectory (Committed and Allocated Sites)

Housing Trajectory April 2019

Allocations

TIER	SITE REF	SITE ADDRESS	Community	No. UNITS	Complete Prior 2013	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	2028+	Not Deliverable	Total Plan Period
						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16+		
1	KSS1 (WR20CS)	Land at Lower Berse Road, Wrexham		1500															100	100	1300		200
1	KSS2 (WR004AS)	Land off Holt New Road, Wrexham		600										50	100	100	100	100	100	50			600
1	KSS2 (WR19CS(A))	Land east of Cefn Road (Esless Park)(KSS2)		1080									130	165	165	120	120	100	100	80	100		980
1	H1 (WR003AS)	Land adj. Mold Road & A483, Stansty, Wrexham		375										24	60	60	60	60	60	51			375
1	H2 (WXT019UCS)	Former Jaques scrapyard, Wrexham		36									5	20								11	25
1	H3 (WXT092NUCS)	Bodhyfryd site, Chester St, Wrexham		71																		71	0
TIER 1 TOTAL				3662	0	0	0	0	0	0	0	0	135	259	325	280	280	260	360	281	1400	82	2180
2	H4 (A04CS)	Rhosymedre Infants site, off Hampden Way, Acrefair/Cefn	Cefn	22																			0
2	H5 (A10CS)	Land opposite former Ruabon works, Queen St. Cefn Mawr	Cefn	51															20	31			51
2	H6 (CH02OS)	Land off B5070, Chirk	Chirk	180												20	40	40	40	40			180
2	H7 (GWE06CS)	Stansty Fields. Stansty, Gwersyllt	Gwersyllt	96										20	40	36							96
2	H8 (GWER003UCS)	Mold Road, Gwersyllt	Gwersyllt	15									8									7	8
2	H9 (LL001UCS)	Royal British Legion, Llay	Llay	60									15	15	15	6						9	51
2	H10 (LL006AS) (P/2014/0905 & P/2017/1054)	Land adj. Home Farm, Llay	Llay	365								50	76	80	80	76						8	362
TIER 2 TOTAL				789	0	0	0	0	0	0	0	50	99	115	135	138	40	40	60	71	0	19	748

TIER	SITE REF	SITE ADDRESS	Community	No. UNITS	Complete Prior 2013	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	2028+	Not Deliverable	Total Plan Period
						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16+		
3	H11 (BRO01OS)	Land South of Berse Rd, Caego	Broughton	25									5	10	10								25
3	H12 (BRO06CS)	Land at Gatewen Rd., New Broughton	Broughton	127									12	35	35	30							15
3	H13 (HOL07CS)	Land adj. Sycamore House, Wrexham Rd. Holt	Holt	35												10	10	15					
3	H14 (O02OS/007OS)	Land off St Mary's Avenue, Overton	Overton	40								20	20										
3	H15 (PENL01CS)	Land at The Grange, Penley	Penley	25								5	10										10
3	H16 (RO004AS)	Land to North & South of Rossett Rd, Rossett	Rossett	137										42	45	45							5
TIER 3 TOTAL				389	0	0	0	0	0	0	0	25	47	87	90	85	10	15	0	0	0	0	30
4	H17 (RR001AS)	Land at Llay New Road, Rhosrobin	Gwersyllt	79									10	25	25	19							
TIER 4 TOTAL				79	0	0	0	0	0	0	0	0	10	25	25	19	0	0	0	0	0	0	0
Total Allocations				4919	0	0	0	0	0	0	0	75	291	486	575	522	330	315	420	352	1400	131	3366

Commitments

TIER	SITE REF	SITE ADDRESS	Community	No. UNITS	Complete Prior 2013	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	2028+	Not Deliverable	Total Remaining Plan Period
						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16+		
1	P/2005/0541 (amended by P/2009/1004 and P/2011/0700)	Hightown Barracks		89	80		9																0
1	P/2016/0337	Former Ebenezer Chapel, 2 Chester St, Wrexham	Acton	23								23											23
1	UDP Allocation 18	Former Depot, Crescent Rd Wrexham	Caia Park	13																		13	0
1	P/2006/0131	Rivulet Rd. (adj. to N Wales Motorcycles)	Caia Park	24																		24	0
1	P/2014/0497	Land off Whitegate Rd, Wrexham		12					12														0

TIER	SITE REF	SITE ADDRESS	Community	No. UNITS	Complete Prior 2013	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	2028+	Not Deliverable	Total Plan Period
						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16+		
1	P/2014/0020	Land South of Bentley Place, Rivulet Rd, Wrexham	Caia Park	50							50												0
1	UDP Allocation 16	Bridge St. /Cambrian Yard, Wrexham	Offa	25																	25		0
1	P/2005/0696	Land off Bridge St., Wrexham	Offa	16					16														0
1	P/2008/0661	Former Red Cow site & no's 23-27 Pen Y Bryn, Wrexham	Offa	22						12	10												0
1	P/2009/0903 UDP Allocation	Dusseks Watery Rd. Wrexham		80					80														0
1	P/2017/0212 P/2016/0401	Western Gateway, Ruthin Rd, Wrexham	Offa	56						16											40		0
1	P/2013/0443	Land at Pen Y Bryn Tenters Square, Tenters lane, Wrexham	Offa	24							24												0
1	P/2014/0116	CK1, 32-36 Bridge St., Wrexham	Offa	10																		10	0
1	P/2015/0890	Former Brother site, Croesnewydd Rd., Wrexham	Offa	79						28	50												0
1	P/2014/0373	16-18 Grosvenor Rd, Wrexham	Rhosddu	20						20													0
1	P/2014/0436	3-9 Grosvenor Rd, Wrexham	Rhosddu	60							60												0
1	P/2015/0272	Trinity House, Trinity St, Wrexham	Rhosddu	21																	21		0
1	P/2013/0840	Coed Aben/Glan Gors Wrexham		23					23														0
1	P/2013/0519	Former Remploy Site, Rhosddu		48				28	20														0
1	P/2012/0880	Former Gas Works, Rivulet Road, Wrexham UDP Allocation		20				20															0
1	2011/0675	Former Gas Works, Rivulet Road, Wrexham UDP Allocation Housing (part 19 (7 units plots 17-23)		35		35																	0

TIER	SITE REF	SITE ADDRESS	Community	No. UNITS	Complete Prior 2013	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	2028+	Not Deliverable	Total Plan Period	
						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16+			
1	P/2013/0525	Maesgwyn Road, Wrexham		24	4	10	10																	
1	2007/1187	Ruthin Road, Wrexham UDP Allocation		297	275	22																		
1	P/2015/0812	Land North of Total Fitness, Stansty Rd, Wrexham	Rhosddu	24					17	7														
1	P/2016/1099	Regent House, Regent Street, Wrexham, LL11 1PR	Rhosddu	27									27											
TIER 1 TOTAL				1122	359	67	67	43	125	83	194	23	27	0	0	0	0	0	0	0	0	86	47	50
2	P/2007/0634	Land at Cae Ann Dolydd, Cefn Mawr	Cefn	20	1																19		1	
2	P/2012/0045 P/2016/0505	Former Air Products Site, Llangollen Road, Acrefair	Cefn	232										30	30	40	33	33	33	33			232	
2	P/2014/0188	Land at Whalley's Way, Cefn Mawr,	Cefn	14					14														0	
2	P/2014/0556	Land at Bro Gwilym, Cefn Mawr	Cefn	12					12														0	
2	P/2015/0949	Land off & West of Park Rd., Rhosymedre	Cefn	30								30											30	
2	1462	Land off Sycamore Drive, Chirk	Chirk	85																	0	85	0	
2	P/2008/0843	Chirk Green, Chirk	Chirk	11	6	5																	0	
2	P/2016/1165	North of Station Ave, Chirk, LL14 5NA	Chirk	24									24										24	
2	P/2009/0794	Old Road, Coedpoeth	Coedpoeth	23	20	3																	0	
2	P/2013/0545	Land at former Hafod Tileries, Johnstown	Esclusham	300																	300		0	
2	P/2014/0652 & P/2014/0242 UDP Allocation	Quarry Brow, Pant lane, Gresford	Gresford	19	13	2	0	2	1	0	1												0	
2	P/2014/0671 UDP Allocation	Bryn Y Groes, Chester Rd., Gresford	Gresford	54					10	4	14	22	4										26	

TIER	SITE REF	SITE ADDRESS	Community	No. UNITS	Complete Prior 2013	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	2028+	Not Deliverable	Total Plan Period
						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16+		
2	P/2018/0166	Old caravan Site, Old Wrexham Road, Gresford, Wrexham, LL12 8AU	Gresford	11									11										11
2	2012/0506	Celtic Yard Westminster Rise Summerhill	Gwersyllt	24	18	6																	0
2	P/2006/0091 P/2010/0261 & P/2010/0270	Jutland Avenue, Gwersyllt	Gwersyllt	14	2		12																0
2	P/2017/0927	Westminster Ind. Est., Mold Rd., Gwersyllt	Gwersyllt	30										10	10	10							30
2	P/2015/0607	Land South of Chestnut Court, Summerhill	Gwersyllt	20					3	13	4												0
2	P/2017/0134	Land at Boozey Fields, Gwersyllt	Gwersyllt	54							18	26	10										36
2	P/2016/0373	Land South of Miners Welfare Institute, Llay	Llay	18								9	9										18
2	P/2007/1069	Moreton Depot, Moreton Ave, Johnstown	Rhos	14							8		6										8
2	P/2015/0382	Land off North Rd, Ponciau	Rhos	23									7	8	8								23
2	P/2012/0010	Former Ysgol Y Wern, Hill Street, Rhos	Rhos	15						4			8									3	8
2	P/2017/0755	New Foundary Buildings, Gutter Hill, Johnstown	Rhos	12							12												0
2	P/2015/0915 & (P/2016/0604)	WCBC Car Park & adj. land, Bonc Wen, Rhos	Rhos	11									11										11
2	1641 & P/2014/0628	Wynnstey Hall, Ruabon	Ruabon	7									7										7
2	P/2013/0797	Maelor Place, Ruabon	Ruabon	19				19															0
2	P/2014/0021	Ruabon Business Park, adj. to A483, Ruabon	Ruabon	319									65	55	55	50	50	44					319
2	P/2017/0342	Land at Pont Adam Crescent, Ruabon	Ruabon	19							18	1											1
2	P/2016/0735	Wynnstey Technology Park	Ruabon	35									17	18									35
TIER 2 TOTAL				1469	60	16	12	21	40	21	75	88	179	121	103	100	83	77	33	33	322	85	817

TIER	SITE REF	SITE ADDRESS	Community	No. UNITS	Complete Prior 2013	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	2028+	Not Deliverable	Total Plan Period
						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16+		
3	P/2013/0697	Land at School Lane, Southsea	Broughton	11							3	4	4										11
3	P/2015/0046 UDP Allocation	Gatewen Village, New Broughton	Broughton	222	73	33	24	31	54	7													149
3	2005/0114 & 2006/1065 amended by 20130252	Brymbo Steelworks, central, southern and western modules	Brymbo	525	503	22																	22
3	P/2007/0395 & P/2007/0424 & P/2017/0217	Land off Queens Rd, Nant Court, Brymbo	Brymbo	28			4	13	7	1	3												28
2	P/2013/0586	Clifton Ave, Brymbo	Brymbo	10			10																10
3	P/2015/0372	Former School Buildings, High St., Brymbo	Brymbo	13							13												13
3	P/2016/0871	Land off Blast Rd., Brymbo	Brymbo	17													17						17
3	P/2008/1063	Wrexham Rd., Rhosyllen	Esclusham	223												33	45	45	50	50			223
3	P/2014/0097	Mount Street, Rhosyllen	Esclusham	15			6	9															15
3	P/2013/0823	Land at Wrexham Rd, Holt	Holt	24									24										24
3	P/2007/0353 & 2008/1147 UDP Allocation	Penley Hospital	Penley	116	91	7	18																25
3	2007/0112 2011/0444	Afoneitha Road, Penrycae UDP Allocation	Penrycae	12	4		8																8
3	P/2016/0626	Vacant plot opposite Bryn Gwenfro, Tanyfron	Brymbo	70									10	20	20	20							70
3	P/2009/0608	Darland House, Rossett	Rossett	10			10																10
TIER 3 TOTAL				1296	671	62	80	53	61	8	19	4	38	20	20	53	62	45	50	50	0	0	342
4	P/2016/0198	Packsaddle Bank, Wrexham Rd., Pentrebychan	Esclusham	10						7	3												0
4	P/2011/0709	Queens Head, Glanllyn, Bradley	Gwersyllt	13		6	1	6															0
TIER 4 TOTAL				23	0	6	1	6	0	7	3	0	0	0	0	0	0	0	0	0	0	0	0
5	P/2014/0292	Site of Former Rosemary Nurseries, Burton, Rossett	Rossett	15				9	6														0

TIER	SITE REF	SITE ADDRESS	Community	No. UNITS	Complete Prior 2013	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	2028+	Not Deliverable	Total Plan Period
						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16+		
TIER 5 TOTAL				15	0	0	0	9	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Commitments				3910	1090	151	160	132	232	119	291	115	244	141	123	153	145	122	83	83	408	132	1209
Windfall Contribution (Remaining LDP 2019-2028)						0	0	0	0	0	0	195	195	195	195	195	195	195	195	195			1755
S106 Sites (1st April 2019)						0	0	0	0	0	0	0	0	0	16	0	0	0	0	0	0		16
Small Sites 2013-2019						64	75	67	96	103	71	0	0	0	0	0	0	0	0	0	0		476
TOTAL						64	75	67	96	103	71	195	195	195	211	195	195	195	195	195			2247
OVERALL TOTAL						215	235	199	328	222	362	385	730	822	909	870	670	632	698	630			6346

Delivery of LDP Allocated Housing Sites – Developer, Land Owner/Agent Evidence (Note: the latest delivery information is contained within the Delivery Statements in Appendix D)

SITE REF (TOTAL UNITS)	TIER	SITE ADDRESS	DEVELOPER	LAND OWNER/AGENT	RESPONSE TO CONSULTATION LETTER	UNITS IN LDP PERIOD
KSS1 (1500)	1	Land at Lower Berse Farm, Ruthin Road, Wrexham	Mr Paul Murray Redrow Homes Northwest, Redrow House, St David's Park, Flintshire, CH5 3RX	Plas Power Estate	Meeting took place 1 March 2019 between Matt Gilbert (The Planning Consultancy), Paul Murray (Redrow) and David Roberts (SCP Transport) and Matthew Phillips and Dave Hesketh to discuss potential for delivering more than 200 units over the plan period. Redrow/SCP believe that there is Highway capacity to deliver development before junction 4 improvements are implemented, potentially including some interim mitigation. DH expressed concerns about the information presented. No agreement reached on exceeding the projected 200 completions over the plan period.	200
KSS2 (1680)	1	Land East of Cefn Road, Wrexham	Barratt Homes & Bloor Homes (northern part). Countryside Properties (southern part)	Agent: Vincent Ryan, Director, Barton Willmore (northern site) Agent :J10 Planning (southern site)	Northern site: is subject to a planning application for 600 dwellings submitted by 2 national housebuilders. Response from Vincent Ryan 15 March 2019 – anticipates development commencing on northern part during 2021-2022, with 25 units being completed that year, 50 per year over the 5 years 2022-2027 and 25 units 2027-2028 – a total of 600 over the plan period. Southern part: Email from J10 Planning on 8 March 2019 anticipate sa planning application being submitted in Summer 2019. They anticipate 30 dwellings being delivered in the 2019-2020 period, with 940 being delivered over the 2019-2028 period.	1580
1 (375)	1	Land adj. Mold Road A483	Developer: Russell Homes	2 landowners. Agent: J10 Planning.	Response by J10 Planning dated 8 March 2019 indicates planning application likely to be submitted during 2019 with commencement of development taking place in early 2021. Email indicates that the site may be developed by two developers in tandem. Completions of 45 per year In 2021-2022, with 60 per year over the following 5 years and 30 in 2027-2028.	375

SITE REF (TOTAL UNITS)	TIER	SITE ADDRESS	DEVELOPER	LAND OWNER/AGENT	RESPONSE TO CONSULTATION LETTER	UNITS IN LDP PERIOD
2 (36)	1	Former Jacques Scrapyard, Wrexham	Castlemead Group, Unit 17 Wilkinson Business Park, Wrexham Industrial Estate, LL13 9AE	Castlemead Group	Full planning application currently being considered for 25 affordable dwellings – application submitted by Castlemead Group and Wales and West Housing Association. Email from Joe O'Donnell of Castlemead confirms expectation of site being built out during 2020-2021	25
3 (71)	1	Civic Quarter, Chester Road, Wrexham	Wrexham CBC	WCBC - Contact: Denise Garland, Housing & Economy Dept, Ruthin Road, Wrexham	Email from David Powell confirms that site is currently included in the Council's long term plans for office accommodation. The plan is to refurbish the building to make it suitable for office accommodation in the long term. As such it will not be available for housing in the period up to 2028.	0
4 (22)	2	Former Rhosymedre Infants Site, Off Hampden Way, Cefn Mawr/ Acrefair		WCBC- Contact: Denise Garland, Housing & Economy Dept, Ruthin Road, Wrexham.	Site under consideration for a self-build project. Discussions with Andrew Harradine in Housing indicate potential for 11 completions in 2020-2022 and a further 11 in 2022-2023. Further information from NRW has indicated that the site is now all C2 Flood. Site not therefore suitable for development.	0
5 (51)	2	Land opposite former Ruabon Works, Queen St. Cefn Mawr		Steve Westhead , Director, HSES Operations EMEA & AP, Solutia Ltd. Corporation Road, Newport, South Wales, NP19 4XF	Email received 27.02.2019 from Steve Westhead indicates that options for the land are currently being considered. It is part of a masterplan study with the Canal and Rivers Trust and WCBC and may include scope for housing.	51
6 (180)	2	Land off B5070, Chirk		Kronospan Ltd	Response received from Kronospan 05.03.2019 confirming expected completions of 20 per year in the 2023-2024 period with 40 per year in the following 4 years.	180

SITE REF (TOTAL UNITS)	TIER	SITE ADDRESS	DEVELOPER	LAND OWNER/AGENT	RESPONSE TO CONSULTATION LETTER	UNITS IN LDP PERIOD
7 (96)	2	Stansty Fields, Stansty, Gwersyllt,	Email from Gower Homes confirming agreed option to purchase.	Mr & Mrs Wooding Agent: Ian Stevens MRTPI, Fisher German LLP, 4 Vicars Lane, Chester CH1 1QU.	Response Angela Smedley of Fishergerman 26.02.2019 confirming expectation of 20 completions in 2021-2022, 40 in 2022-2023 and 36 in 2023-2024.	96
8 (15)	2	Mold Road Ind. Estate, Hardwick Drive, Gwersyllt		Paulson Properties Ltd, 25 Dee Banks, Chester, CH3 5UU and Stephen Parry	Email from Palson Properties indicating 8 dwellings to be completed 2020-2021. No written response from Stephen Parry. Verbal confirmation that the remainder of the site will not be developed out over the plan period.	8
9 (60)	2	British Legion, Llay		Royal British Legion, Haigh House, Borough High Street, London, SE1 1AA Agent – Steven Edgeller - Edgeplan	Email from agent for planning application confirmed 20.02.2019 indicates 51 units being completed – 15 each in the 3 years 2020-2023 and 6 in 2020-2024. Committee resolution to grant – 25.02.2019 pending completion of planning obligation.	51
10 (365)	2	Land at Home Farm, Llay	Bellway and Anwyl	Developers	Development commenced in early 2019. Developers anticipate site being built out by 2023-2024	362
11 (25)	3	Land South of Berse Road, Caego, New Broughton		Owners: Plas Power Estate. Agents, Strutt & Parker, Chester	Emails 05.03.2019 from A. Marrs (Strutt & Parker). 5 completions expected 2020-2021 and 10 in each of the following 2 years.	25

SITE REF (TOTAL UNITS)	TIER	SITE ADDRESS	DEVELOPER	LAND OWNER/AGENT	RESPONSE TO CONSULTATION LETTER	UNITS IN LDP PERIOD
12 (129)	3	Land at Gatewen Rd, New Broughton		Mr Mike Hamer, Head of Estates & Campus Management, Glyndwr University, Mold Road, Wrexham, LL11 2AW	Email 05.03.2019 from Andrew Smith of Narvo, agent for outline planning application. Anticipate development commencing 2021-2022 and site being built out by 2024-2025	112
13 (35)	3	Land adj to Sycamore House, Wrexham Road, Holt	Agent: Paul Kent, Peak Architectural, Yew Tree Farmhouse, Wrexham Road, Holt, LL13 9YU	Mrs V.G. Pridding	Email 06/03/2019 from agent Paul Kent (Peak Architectural). Anticipates dev 10 completions per year 2025-2026 and 2026-2027 with 15 in 2027-2028. There have been two complies interested in developing the site.	35
14 (40)	3	Land off St Mary's Avenue, Overton	J Ross Developments.	Owner: Bryn Pys Estate. Agent: Paul Shuker, Lambert Smith Hampton	Emails received 25.02.2019. Completions of 20 per year over 2 years anticipated starting 2020-2021.	40
15 (25)	3	Land at The Grange, Penley	Primesave Properties Limited, London House, Town Walls, Shrewsbury	Owner -Developer	Planning application for 15 dwellings submitted. Site expected to be developed out by 2020-2021	15
16 (137)	3	Land to North & South, Rossett Rd, Rossett	Agent: Justin Paul, J10 Planning Ltd, Chester	Owner: Bellis Bros Ltd	Outline planning application refused 7 January 2019. Applicant intends to appeal. Interest received from 15 housebuilders. Completions of 42 expected 2021-2022 and 45 per year in the following two years.	132

SITE REF (TOTAL UNITS)	TIER	SITE ADDRESS	DEVELOPER	LAND OWNER/AGENT	RESPONSE TO CONSULTATION LETTER	UNITS IN LDP PERIOD
17 (79)	4	Land at Llay New Road Rhosrobin	SG Estates	SG Estates	Completions expects to commence in 2021, with the site being built out during 2023-2024	79

Appendix C – Housing Trajectory and 5 Year Land Supply Calculations

Calculating a 5 Year Housing Land Supply over the plan period (2013-2028 - 15 Years)

	LDP Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16+
A	Year	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-2028	2028+
B	Remaining years	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	0
C	Total LDP housing requirement (not provision)	7750	7750	7750	7750	7750	7750	7750	7750	7750	7750	7750	7750	7750	7750	7750	
	Annual Plan Requirement	517	517	517	517	517	517	517	517	517	517	516	516	516	516	516	
D	Actual recorded completions on large sites during year	151	160	132	232	119	291										
E	Actual recorded completions on small sites during year	64	75	67	96	103	71										
F	Anticipated completions on allocated sites during year							75	291	486	575	522	330	315	420	352	1400
G	Anticipated land bank completions during year*+S106* 16 at April 2019							115	244	141	139	153	145	122	83	83	108
H	Anticipated completions large windfall during year							120	120	120	120	120	120	120	120	120	120
I	Anticipated completions small windfall sites during year							75	75	75	75	75	75	75	75	75	75
	TOTAL COMPS	215	235	199	328	222	362	385	730	822	909	870	670	632	698	630	1703
J	Total anticipated annual completions (D+E+F+G+H+I) minus 10% flexibility on future annual completions. Not done for first 5 years as shortfall is already accounted for. Rounded to zero DP.	215	235	199	328	199.80	325.80	346.50	657.00	739.80	818.10	783.00	603.00	568.80	628.20	567.00	
K	Total cumulative completions (Rounded to zero decimal places)	215	450	649	977	1177	1503	1849	2506	3246	4064	4847	5450	6019	6647	7214	
L	Residual housing requirement (C-K)	7535	7300	7101	6773	6573	6247	5901	5244	4504	3686	2903	2300	1731	1103	536	
N	5 Year requirement (L/B*5) See Notes for Row N	2691	2808	2959	3079	3287	3471	3688	3746	3753	3686	3419	3332	3279	3167	3116	
O	Total Annual Building Requirement (N/5)	538	562	592	616	657	694	738	749	751	737	684	666	656	633	623	
P	Land available large sites (allocations)						1949	2204	2228	2162	1939	1617	1387	1172	852	600	16110
Q	Land available large sites (land bank)						792	822	700	642	586	433	288	166	83	0	
R	Land available - large windfall						600	600	600	600	600	600	600	600	600	600	
S	Land available - small windfall						375	375	375	375	375	375	375	375	375	375	
T	Total land available for the 5 year period derived from (P+Q+R+S)						3716	4001	3903	3779	3500	3025	2650	2313	1910	1575	
U	Housing land supply in years (T/O) Rounded to zero DP						5	5	5	5	5	4	4	4	3	3	

NB: The table below identifies anticipated completions on those allocated and committed sites which are expected to be developed beyond the Plan period. Where less than 5 years of the Plan remain, the data below have been factored into the housing land supply calculations for years 11 to 15 (Rows P and Q as highlighted in yellow in the table above). This allows for a more realistic land supply to be calculated.

Site	Remaining No. units at 2028	No. units to be delivered per year					
		2028-2029	2029-2030	2030-2031	2031-2032	2032-2033	2033+
KSS1	1300	100	100	100	100	100	800
KSS2	100	100					

Appendix D – Housing Allocation Delivery Reports

**Wrexham County Borough Council Local Development Plan 2013-
2028**

**Policy H1 Non-Strategic Site Delivery Statement
Site 1: Land adjoining Mold Road/A483**

SITE DETAILS		
Site Reference	1	No. of units Minimum 375
Site Address	Land adjoining Mold Road/A483	

SITE STATUS	
Is site vacant or when is it likely to come vacant	Vacant
Land ownership/legal	Option Secured by Russell Homes with the landowners –
Developer Interest	Russell Homes

PLANNING STATUS
Pre App Enquiry
Submitted 7 February 2019
Statutory Pre-Application Consultation
Planned to be undertaken in September 2019
Planning Application(s)
Outline planning application planned to be submitted in October 2019
Planning Appeal(s)
NA
Commencement of development
Parcel 1 anticipated January 2021. Parcel 2 anticipated January 2022. Possibility of bringing forward parcel 2 earlier than set out below.

SITE DELIVERABILITY										
2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028
				24	60	60	60	60	60	51

Completed by:

Justin Paul, Managing Director, J10 Planning Ltd
Gary Lynch, Planning Director, Russell Homes (UK) Ltd

On behalf of:

Russell Homes

Date:

22 August 2019

Russell Homes have had pre-application meetings with the Council. They are well advanced in the preparation of an outline planning application and are aiming to commence the Statutory Pre-Application Consultation in September 2019. Russell Homes will consider any consultation feedback from this process to inform any required updates to the application documentation, then anticipate submitting the planning application in late October 2019. Application determination has been anticipated for March 2020 (5 months from application submission) and this is entirely plausible given the positive feedback received from the Council and statutory consultees to-date, as well as the requisite Statutory Pre-Application Consultation process planned before application submission. In advance of application determination, Russell Homes will have begun the marketing of the Site to a preferred partner house builder/s in facilitating a two builder development site, and are targeting the 1st parcel Reserved Matters to be submitted by August 2020 and determined by December 2020; and for the 2nd parcel Reserved Matters to be submitted January 2021 and determined May 2021. Each Reserved Matters will be accompanied by all pre-commencement conditions discharge information, to secure discharge of these at the approval of the Reserved Matters, and to ensure a prompt site start. Accordingly Russell Homes consider their anticipated planning application timescales and delivery period (covered below) to be realistic, having experience of delivering development parcels of a similar size.

Russell Homes are a unique company in that they are an award winning house builder, developer, land promoter and contractor (building their own homes and on behalf of other developers and Housing Associations). This make-up provides them with robust experience in the coordination of development and delivery of infrastructure and housing. They've already had several discussions with leading house builders, both national, and regional/local (North Wales) about delivering the site with one or more house builders, to secure an understanding of interest, delivery partners, and delivery rates. This compliments Russell Homes' own market research as house builder. There is a clear consensus to develop the site with two house builders simultaneously, providing complimentary housing types and character. Other house builders have confirmed to Russell Homes that for this Site they are more than comfortable with this dual build approach, whether building with Russell Homes or another house builder.

Russell Homes has prepared the illustrative masterplan to support the planning application. The Council has reviewed this and other technical information, and have commended Russell Homes' approach and proposed layout. Russell Homes have given the layout great consideration, informed by surveys and the expert advice of their technical team, made up of architects, landscape architects, ecologists, town planners, engineers and surveyors etc. This layout neatly facilitates two development plots, and allows the masterplan site to be delivered expediently. The logistics of bringing this forward with two house builders is already being planned.

Russell Homes' anticipated delivery rates have been informed by local market research and past build rates of local house builders. For example, at one scheme within less than 1 mile of the site, a development build by one house builder achieved build rates at between 3 and 5 units per month (range of 36-60 units per annum). Accordingly Russell Homes' assumption of two house builders building at 60 units per annum in total is considered to be an accurate trajectory. Where one house

builder is building solely during interim months, Russell Homes assume 4 units per month. This is reduced to 3 units per month, per house builder, where two house builders are delivering houses.

Based on the above assumptions, within 5 years of the adopted Plan (expected Spring 2020) 204 units will have been delivered. Within 5-10 years of the adopted Plan, the remaining 171 units will have been built, and the whole Allocation Site completed by the end 2028.

Summary of Key Delivery Matters

To facilitate the Examination in Public and demonstrate the robustness of the Site Allocation's deliverability credentials, we have provided the following summary:

Planning Application

As noted above, Russell Homes are very advanced in the preparation of an Outline planning application for submission to statutory consultees, the local community and councillors, via the Statutory Pre-Application Consultation. Discussions with the Local Planning & Highways Authority and some of the statutory consultees to date, have been positive.

Highways

Russell Homes' transport consultants have prepared a detailed Transport Assessment (TA) to support the planning application, informed by surveys and modelling work, and discussions with the Local Highways Authority, North Wales Trunk Road Authority and Welsh Government.

The assessment has been informed through the undertaking of weekday traffic surveys over two months, including queue surveys. Additionally, a number of key design matters and assessment parameters, which would have a bearing on the assessment of effects, have been discussed and agreed with WCBC Highways officers – these include site access form and location, the extent of the study area, methodology for determining likely development trip generation and distribution and the approach to estimating future traffic growth and local committed development schemes.

Network modelling has been undertaken for a total of 6 existing junctions, along with the proposed main site access junction to the A541 Mold Road. Assessments of capacity have been undertaken using industry standard software – JCT Consultancy's LinSig V3 for signalised junctions, and TRL's Junctions9 for priority-controlled T-junctions and roundabouts.

The assessment work to date demonstrates that for the majority of the study area that has been considered, the highway network currently operates with reasonable levels of spare capacity and would continue to do so during future years "Do Nothing" (no development) and "Do Something" (with development) conditions. Crucially, it is key to note that traffic associated with the proposed residential development is anticipated to have only a negligible effect, when compared to both "Do Nothing" (no development) and "Do Something" (with development) conditions.

Russell Homes' transport consultants instructed JCT Consultancy to investigate the potential for improvements to be made at A483 J5 and B&Q roundabouts. JCT were able to identify two potential

stages of mitigation, the first comprising a package of works to amend carriageway lane markings across both junctions, and the second to implement signalisation of the A541 Mold Road (E) approach to the A483 J5.

Modelling of the 2 mitigation strategies has identified that the Stage 1 package in particular could offer **significant positive impacts across both junctions**, with material increases in junction capacity when compared to “Do Nothing” (no development) scenario conditions, and corresponding decreases in queuing and delay. Indeed, such is the significance of the positive effect that the mitigation works are anticipated to result in a **net betterment when compared with “Do Nothing” conditions**, and even when compared with prevailing 2019 conditions during the PM peak.

On the basis of the findings, it is concluded that the development could be brought forward with only negligible adverse impacts, assuming no mitigation is proposed. However, mitigation measures have been identified and modelled, which confirms that significant positive impacts are gained to the benefit of the local network.

Ecology

There are **no designated sites of nature conservation on site** and the development is concluded as not affecting any further afield. No habitats within the site are designated as a Section 7 Environment (Wales) Act 2016 habitat of principal importance.

Habitat and species surveys have been undertaken across the site over the last two years. The **grassland habitats within the site are poor quality and common** and widespread in the area, so are of low intrinsic value. The loss of this habitat is not considered to be a significant impact.

The bird species recorded during the breeding bird survey within the site and site buffer represents a **low species diversity** with the majority of species recorded being commonplace and widespread.

All mature trees across the site are proposed to be retained under the development proposals. The vast majority of the Hedgerows are being retained too. Any Hedgerow loss will be replaced with native species rich varieties.

Mitigation measures can be provided to minimise light spill towards trees with bat potential.

The surveys have confirmed that there **no badger setts or lizards on site**. There are **no ponds** within 250m of the site and both the Council’s ecologist and Species Officers at Natural Resources Wales (NRW), are satisfied that no further surveys are required, specific to Great Crested Newts. A Method Statement can be produced detailing the measures to be taken to ensure that, in the unlikely event of amphibians being present, they are not harmed by the works.

Landscape Visual Impact Assessment

The LVIA concludes that the proposed development would **not result in any significant adverse landscape and visual effects**, with effects being **minor adverse to negligible or negligible**. Taking in to account the settlement edge location, and the retention and planting of new trees and hedgerow, would successfully assimilate the development into the surrounding landscape.

Noise

A noise survey has been prepared and recommendations prepared in response to this. In order to address noise impacts, first and foremost the layout has been designed with noise in mind and good acoustic design has been incorporated at all boundaries with dwellings fronting the roads, gaps kept to a minimum and, where possible, garages providing shielding to the road. Through good passive design and acoustic barrier measures, it is demonstrated that **noise can be properly mitigated and addressed in line with guidance**, and is thus **not a constraint to planning consent**.

Air Quality

An Air Quality Assessment has been undertaken. The dispersion modelling results indicated that pollutant levels at sensitive locations across the site were below the relevant AQOs. The location is therefore considered **suitable for residential use without the inclusion of mitigation** methods to protect future users.

Predicted impacts on annual mean NO₂ and PM₁₀ concentrations as a result of operational phase exhaust emissions were predicted to be **negligible** at all 20 sensitive receptor locations during the 2024 and 2030 assessment scenarios. The overall significance of potential impacts was determined to be not significant in accordance with the EPUK and IAQM guidance.

Based on the assessment results, **air quality is not considered a constraint to planning consent** for the proposed development.

Utilities

A utilities assessment was undertaken early in the emerging Local Plan process, and Russell Homes' technical team has been liaising with statutory undertakers for the past 12 months to secure the relevant services ready for commencing on site. This includes instructing Welsh Water to appraise capacity and facilitate provision for foul water drainage.

Drainage Strategy

Russell Homes began discussions with the Council's lead drainage officers early in emerging Local Plan process and more recently with SAB (Sustainable Urban Drainage Approval Body) officers. A drainage strategy has been prepared to support the planning application which aligns with SAB guidance, providing a mixture of ponds, swales, tree pits, permeable surfaces and garden storage.

**Wrexham County Borough Council Local Development Plan 2013-
2028**

**Policy H1 Non-Strategic Site Delivery Statement
Site 2: Jacques Scrapyard, Wrexham**

SITE DETAILS		
Site Reference	2	No. of units
Site Address	25	
Jacques Scrapyard, Wrexham		

SITE STATUS	
Is site vacant or when is it likely to come vacant	Vacant
Land ownership/legal	Wales and West Housing
Developer Interest	Wales and West Housing

CURRENT PLANNING STATUS
Pre App Enquiry
Statutory Pre-Application Consultation
Completed September 2018
Planning Application(s)
Full Planning Permission for 25 affordable dwellings granted 7.6.2019
Planning Appeal(s)
n/a
Commencement of development
November 2019

SITE DELIVERABILITY										
2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028
			5	20						

Completed by: , Development Officer

On behalf of: Wales and West Housing

Date: 23rd August 2019

**Wrexham County Borough Council Local Development Plan 2013-
2028**

**Policy H1 Non-Strategic Site Delivery Statement
Site 5: Land Opposite former Ruabon Works, Queen Street, Cefn
Mawr**

SITE DETAILS		
Site Reference	5	No. of units
Site Address	51	
Land Opposite former Ruabon Works, Queen Street, Cefn Mawr		

SITE STATUS	
Is site vacant or when is it likely to come vacant	Vacant
Land ownership/legal	Solutia UK Limited
Developer Interest	There is no current developer interest and Solutia is not actively seeking a developer at present

CURRENT PLANNING STATUS
Pre App Enquiry
To be undertaken after the end of 2022
Statutory Pre-Application Consultation
To be undertaken after the end of 2022
Planning Application(s)
To be submitted after the end of 2023
Planning Appeal(s)
Commencement of development
Development would start at the earliest 2024 but is more likely towards the end of the LDP planning period, if it happens at all. With this delivery statement, Solutia is making no commitment to pursuing development of this site for housing

SITE DELIVERABILITY										
2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028
									20	31

Completed by:

**On behalf of:
Solutia UK Limited**

**Date:
29th August 2019**

Wrexham County Borough Council Local Development Plan 2013-2028

Policy H1 Non-Strategic Site Delivery Statement Site 6: Land off B5070 Chirk

SITE DETAILS		
Site Reference	6	No. of units
Site Address	180	
Land off B5070, Chirk		

SITE STATUS	
Is site vacant or when is it likely to come vacant	Vacant
Land ownership/legal	Kronospan Property Ltd
Developer Interest	To be sought upon adoption of LDP

CURRENT PLANNING STATUS
Pre App Enquiry
To be undertaken during early 2022
Statutory Pre-Application Consultation
To be undertaken during early to mid 2022
Planning Application(s)
To be submitted mid to late 2022
Planning Appeal(s)
Commencement of development
Mid 2023

SITE DELIVERABILITY										
2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028
						20	40	40	40	40

Completed by:

On behalf of: Kronospan Property Limited

Date: 20th August 2019

**Wrexham County Borough Council Local Development Plan 2013-
2028**

**Policy H1 Non-Strategic Site Delivery Statement
Site 7: Stansty Fields, Stansty, Gwersyllt**

SITE DETAILS		
Site Reference	7	No. of units
Site Address	96	
Stansty Fields, Stansty, Gwersyllt		

SITE STATUS	
Is site vacant or when is it likely to come vacant	Vacant
Land ownership/legal	The landowner has been approached by a number of parties who do not wish to be named, however MacBryde Homes are happy to disclose their interest.
Developer Interest	

CURRENT PLANNING STATUS
Pre App Enquiry
To be undertaken during early 2020
Statutory Pre-Application Consultation
To be undertaken during early to mid 2020
Planning Application(s)
To be submitted mid to late 2020
Planning Appeal(s)
Commencement of development
Mid 2021

SITE DELIVERABILITY										
2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028
				20	40	36				

Completed by:

On behalf of:

Date: 19/08/2019

Wrexham County Borough Council Local Development Plan 2013-2028

Policy H1 Non-Strategic Site Delivery Statement Site 9: British Legion Llay

SITE DETAILS		
Site Reference	9	No. of units
Site Address	51 (application) 60 (allocation)	
British Legion, Llay		

SITE STATUS	
Is site vacant or when is it likely to come vacant	No
Land ownership/legal	Llay British Legion Social Club Ltd
Developer Interest	To be marketed on issue of Planning Permission

CURRENT PLANNING STATUS
Pre App Enquiry
Undertaken during 2017
Statutory Pre-Application Consultation
Undertaken during August-September 2018
Planning Application(s)
P/2018/0933 Mixed use hybrid application: Outline for residential, retail unit and boxing club, full for car park. Committee resolution to grant pending completion of Planning Obligation.
Planning Appeal(s)
n/a
Commencement of development
Mid to late 2020

SITE DELIVERABILITY										
2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028
			15	15	15	6				

Completed by: , Edgeplan Ltd

On behalf of: The Royal British Legion

Date: 23 August 2019

Wrexham County Borough Council Local Development Plan 2013-2028

Policy H1 Non-Strategic Site Delivery Statement
Site 11: Land south of Berse Road, Caego, New Broughton

SITE DETAILS		
Site Reference	11	No. of units
Site Address	25	
Land south of Berse Road, Caego, New Broughton		

SITE STATUS	
Is site vacant or when is it likely to come vacant	Yes
Land ownership/legal	Plas Power Estate
Developer Interest	There has been developer interest for the site, however the developer identities are confidential at this stage.

CURRENT PLANNING STATUS
Pre App Enquiry
Statutory Pre-Application Consultation
To be undertaken in late 2019 early 2020
Planning Application(s)
To be undertaken in late 2019 early 2020
Planning Appeal(s)
Commencement of development
Late 2020 / early 2021

SITE DELIVERABILITY										
2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028
			5	10	10					

Completed by: , Strutt & Parker

On behalf of: Plas Power Estate

Date: 21.08.19

**Wrexham County Borough Council Local Development Plan
2013-2028**

**Policy H1 Non-Strategic Site Delivery Statement
Site 13: Land adjacent to Sycamore House, Wrexham Road,
Holt**

SITE DETAILS		
Site Reference	13	No. of units
Site Address		35
Land adjacent to Sycamore House, Wrexham Road. Holt		

SITE STATUS	
Is site vacant or when is it likely to come vacant	Yes
Land ownership/legal	
Developer Interest	Mcbryde Homes, St. Asaph

CURRENT PLANNING STATUS
Pre App Enquiry
Statutory Pre-Application Consultation
To be undertaken 2020
Planning Application(s)
To be submitted 2021
Planning Appeal(s)
Commencement of development
2022

SITE DELIVERABILITY										
2017 - 2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028
						10	10	15		

Completed by:
Peak Architectural

On behalf of:

Date: 23/08/2019

**Wrexham County Borough Council Local Development Plan 2013-
2028**

**Policy H1 Non-Strategic Site Delivery Statement
Site 14: Land off St Mary's Avenue Overton**

SITE DETAILS		
Site Reference	14	No. of units
Site Address	45	
Land off St Mary's Avenue Overton		

SITE STATUS	
Is site vacant or when is it likely to come vacant	Yes
Land ownership/legal	Bryn y Pys and Overton Estates
Developer Interest	Pickstock Homes

CURRENT PLANNING STATUS
Pre App Enquiry
Submitted August 2019
Statutory Pre-Application Consultation
To be undertaken late 2019
Planning Application(s)
To be submitted late 2019
Planning Appeal(s)
Commencement of development
Early to mid 2020

SITE DELIVERABILITY										
2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028
		20	25							

Completed by:

On behalf of: Pickstock Homes

Date: 21.08.2019

**Wrexham County Borough Council Local Development Plan 2013-
2028**

**Policy H1 Non-Strategic Site Delivery Statement
Site 16: Land north and south of Rossett Road Rossett**

SITE DETAILS		
Site Reference	16	No. of units
Site Address	132	
Land north and south of Rossett Road, Rossett	(application) 137 (allocation)	

SITE STATUS	
Is site vacant or when is it likely to come vacant	Yes
Land ownership/legal	Bellis Brothers
Developer Interest	Almost 20 no. expressions of interest and several offers have been submitted to the agent. These are not subject to the outcome of the extant planning appeal or planning application determination. However, the landowner is keen to establish the planing position and obtain permission and/or allocation which will enable him to dispose of the land to a developer. There has been no shortage of interest and Appendix C to the J10 Planning Statement in support of P/2019/0460 provides letters from a list of almost 20 no. housebuilders thus proving market interest.

CURRENT PLANNING STATUS
Pre App Enquiry
Submitted 19 June 2015
Statutory Pre-Application Consultation
Undertaken July 2015 to January 2017
Planning Application(s)
P/2018/0560 Outline planning application submitted in July 2018 for residential development of two parcels of land (north parcel for up to 61 dwellings, south parcel for up to 71 dwellings), extension to community parking facility (in association with northern parcel) with associated means of access and all other matters reserved with indicative provision made for pedestrian crossing, pedestrian linkages, public open space and affordable housing. Refused 7.1.2019 P/2019/0460 Outline planning application submitted in June 2019 for residential development of two parcels of land (northern parcel for up to 61 no. dwellings, southern parcel for up to 71 no. dwellings), extension to community parking facility (in association with northern parcel) with associated means of access and off-site highway improvements with all other matters reserved but indicative provision made for pedestrian crossing, pedestrian linkages, public open space, landscaping and affordable housing (re-submission of planning application reference P/2018/0560). Pending determination.

Planning Appeal(s)

Appeal lodged with PINS against refusal of P/2018/0560 in June 2019.

Informal Hearing scheduled for 16.10.2019.

A Statement of Common Ground (dated 17 April 2019) relating to the appeal was signed on 15 May 2018 by the principal Local Authority parties – this is appended to this document. It confirms that there are no technical or planning issues of disagreement between the two parties.

Commencement of development

Should permission be granted for P/2019/0460 during Q4 2019 and/or the appeal against P/2018/0560 be allowed by the end of 2019 the landowner intends to dispose of the land during 2020.

This would allow any Reserved Matters application(s) to be submitted for determination and pave the way for development to commence in late 2020 with units being delivered in early 2021.

SITE DELIVERABILITY

2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028
				42	45	45				

Completed by:

Justin Paul (J10 Planning Ltd)

On behalf of:

Bellis Bros Ltd

Date:

28 August 2019



PLANNING APPEAL STATEMENT of COMMON GROUND

17 April 2019
Ref. J10-BB-SoCG-RevC

J10 Planning Limited
1-3 Upper Eastgate Row Chester CH1 1LQ
01244 349400 (T) 01244 349402 (F)
www.j10planning.com

STATEMENT OF COMMON GROUND	
PINS Reference:	APP/ TBD
LPA Reference:	P/2018/0560
Site Address:	land adjacent to Lane Farm, Rossett Road / Holt Road, Rossett, Wrexham, LL12 0DS
Permission sought:	Outline with all matters reserved except for means of access
Description of Development :	Residential development of two parcels of land (for up to 61 no. dwellings : Northern Parcel and up to 71 no. dwellings : Southern Parcel); extension to community parking facility (in association with the Northern Parcel) with associated means of access and all other matters reserved, but indicative provision made for pedestrian crossing, pedestrian linkages, public open space, landscaping and affordable housing.
Appellants:	Bellis Bros Ltd & the Trustees of the Bellis Family Trust
Date of Submission:	5 July 2018
Date of Determination:	7 January 2019
LPA:	Wrexham County Borough Council
This statement addresses the following areas of common ground: 1) The Purpose 2) Background 3) Areas of Agreement : Matters Not in Dispute. 4) Areas of Disagreement : Matters in Dispute. 5) The Plans Submitted for Determination 6) Planning Conditions and S106 7) Planning Appeal Procedure 8) Appendix 1 : Highway-specific SoCG	
Signed on behalf of Appellants: 15 May 2019 Date Name Position Appellant Agent	Signed on behalf of LPA: 14.05.19 Date Name Position Development Control Manager
VERSION	Rev C : 17 April 2019

THE PURPOSE

- 1.1 This Statement of Common Ground (SoCG) has been undertaken to narrow the issues and focus the evidence in respect of the impending Planning Appeal against the refusal of Outline planning permission.
- 1.2 The reason is in order to reduce (or indeed avoid) Hearing / Inquiry time, save resources and avoid unnecessary time being spent at the appeal on areas where there is agreement.

BACKGROUND

1.3 Permission was refused contrary to Officer recommendation on 7 January 2019 and the following reasons were given on the decision notice

- a. The site lies outside of the settlement limit, within a Green Barrier and Special Landscape Area and contains Grade 2 and 3a agricultural land. The proposed development therefore conflicts with policies PS1, EC1, EC2, EC5 and H5 of the Wrexham Unitary Development Plan.
- b. Due to the lack of continuous pedestrian footway provision along Holt Road and the increase in vehicular and pedestrian traffic that will be generated by the development the proposals will be detrimental to pedestrian safety and therefore conflict with Policy GDP1(d).

1.4 The decision notice refers to a series of Wrexham UDP policies used in reaching the decision to refuse:

Policy Ref.	Policy Name
CLF5	Open space requirements from new residential developments
EC1	Green Barriers
EC11	Archaeology
EC12	Development and flood risk
EC13	Surface water run-off
EC2	Agricultural Land
EC4	Hedgerows, Trees and Woodland
EC5	Special Landscape Areas
EC6	Biodiversity conservation
GDP1	Development objectives
H5	Housing in the countryside
H7	Affordable housing within new developments
PS1	Settlement limits
T8	Parking

1.5 The policies actually used specifically in the reasons for refusal are highlighted in RED in the table above.

AREAS OF AGREEMENT : MATTERS NOT IN DISPUTE

- 1.6 The differences between the appellant and the Authority (upon determination) can be summarised as follows:
- i. Whether there are relevant material considerations that justify departure from the extant UDP policies referred to in the first reason for refusal; and
 - ii. Whether the development gives rise to a pedestrian safety concern in respect of Holt Road.
- 1.7 **Firstly**, we would like to agree with Officers the following:
- 1.8 The appellant does not believe that there is any dispute between the principal parties on the following issues:
1. Open space provision : the site can deliver adequate POS in accordance with existing UDP policy standards; through the use of a S106 legal agreement to confirm provision, maintenance and management
 2. Archaeology : there is no objection by the Council on archaeology grounds as there is no evidence of any archaeology assets
 3. Drainage strategy and flood risk : there is no objection by the Council on drainage or flood risk grounds
 4. Hedgerows, Trees and Woodland : there is no objection by the Council on such grounds and no loss of assets except for highway access purposes and any loss will be adequately mitigated for through replacement planting
 5. Biodiversity and ecology : there is no objection by the Council on such grounds
 6. Affordable housing : the site can deliver 25% affordable housing in compliance with existing UDP policy through a S106 legal agreement
 7. Parking : the site can deliver adequate resident and visitor parking in accordance with current standards being sought; indeed, enhanced community parking provision is being proposed and no objection has been raised about this issue by the Council
- 1.9 The decision notice lists all policies relevant to the development and therefore the Council's consideration. However only those policies in the reasons for refusal are directly applicable to the decision itself. Policies CLF5, EC11, EC12, EC13, EC4, EC6, H7 and T8 are cited on the decision notice as being relevant to the proposed development. However, they are not cited in the reasons for refusal and do not relate to matters that are in dispute.

1.10 **Secondly**, we would like to agree with Officers the following:

1.11 The appellant does not believe that there is any dispute between the principal parties on the following issues:

1. Green Barrier : the site is defined in the UDP as falling within such a policy designation, however, the emerging LDP proposes the site be removed from Green Barrier/Wedge
2. Agricultural land : the site does comprise BMV
3. Special Landscape Area : the site is defined in the UDP as falling within such a policy designation, however, the emerging LDP proposes the site be removed from this designation
4. Housing in the countryside and Settlement limits : under the current UDP this policy applies as the site is beyond the existing settlement limits, however the emerging LDP is proposing to amend the settlement limit for Rossett and include this site within it

1.12 It is a matter of fact that a Full Council meeting held on the 22 November 2018 resolved to submit the LDP for Examination. This was duly done on 29th November 2018.

1.14 **Thirdly**, we would like to agree with Officers the following:

1.15 The appellant does not believe that there is any dispute between the principal parties on the following issues:

1. Community infrastructure impacts and obligations: e.g. education, health, public open space and affordable housing
2. General illustrative design and layout and its relationship with the development capacity of the site

1.16 These issues will not be raised by or at the appeal.

AREAS OF (PRIOR) DISAGREEMENT : MATTERS IN DISPUTE

- 1.17 Upon determination, this left the following item that appeared to be in dispute :

Development Objectives : with specific reference having been made to Policy GDP1(d) which states that new development should *"Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality"*

- 1.18 This relates solely to the 2nd reason for refusal. Whether the proposed development would prove prejudicial to pedestrian safety.

- 1.19 Following an intense period of negotiation, new highway evidence and an improved off-site highway improvements plan there now no longer appears to be any dispute about whether the development is sustainable or not; nor does there appear to be any dispute about traffic safety, visibility or residential amenity. The main (original) concern raised by Highway Officers (and Members who sought to use this concern as the basis for the reason for refusal) is the belief that the development would exacerbate pedestrian safety for existing local residents and future occupiers of the site seeking to use Holt Road as their walking route to and from the development site; this has now been resolved.

- 1.19 The Highway-specific SoCG is provided (see **Appendix 1**).

THE PLANS SUBMITTED FOR DETERMINATION

1.20 It is agreed between the principal parties that the following plans are applicable to the Planning Appeal in the event the Inspector determines the appeal in favour of the appellant:

- Masterplan 100-27-SMP-01 Rev H (September 2018)
- Masterplan Access 100-37-SMPA-01 (December 2018)

PLANNING CONDITIONS & S106

1.21 The list of conditions attached to the Officers committee report dated 7 January 2019 are agreed.

1.22 The appellant will prepare a S106 Unilateral Undertaking pursuant to S106 of the Town & County Planning Act which shall cover the following items:

- Affordable Housing : 25% provision
- Public Open Space : management and maintenance
- Educational supplement : to address any shortfall in Secondary school provision

PLANNING APPEAL PROCEDURE

1.23 Subject to this SoCG being signed by both principal parties the appellant and Authority agree that the written representation appeal procedure be used and is appropriate.

APPENDIX 1

Highway-specific SoCG



PROPOSED RESIDENTIAL DEVELOPMENT, ROSSETT ROAD, ROSSETT

LPA REF: P/2018/0560

APPEAL REF: APP/XXXX/X/XX/XXXXXX

HIGHWAYS STATEMENT OF COMMON GROUND BELLIS BBROS LTD & WREXHAM COUNTY BOROUGH COUNCIL (WCBC) – 14 MAY 2019

1. This document sets out the areas of agreement relating to the highways issues of a planning appeal relating to a proposed residential development on land to the north and south of Rossett Road in Rossett.
2. This Statement of Common Ground sets out the matters relating to traffic impact that are agreed between the appellants and Wrexham County Borough Council (WCBC), including trip generation rates and trip distribution, as well as any matters that are not agreed.
3. The documents referenced for this Statement of Common Ground, are as follows:
 - Transport Assessment (TA) prepared by Croft Planning & Design dated 6th November 2018 (ref. o807TA.9).

Matters Agreed

4. 2015 Surveyed Flows

It is agreed that the 2015 surveyed flows contained in Figures 1 and 2 within the Transport Assessment are representative of the AM and PM peak periods of the local highway network.

This was originally raised as a matter of potential concern given the lapse in time since the original surveys were undertaken. To that end, the highway office requested that some evidence be put forward so that the level of traffic volumes in 2015 and 2018 could be compared.



An Automatic Traffic Counter (ATC) was therefore installed on the B5445 Chester Road for a duration of 1 week between 26th September 2018 and 2nd October 2018. The ATC collected both vehicle volumes and traffic speeds. The 2018 data shows there has been a reduction in traffic since the original surveys were undertaken on 2015. On that basis, it is considered that the original 2015 data is suitable and appropriate for use for the assessments. Indeed, this was confirmed by the highways officer during the meeting and so no additional surveys have been undertaken.

5. Trip Generation Rates

The trip generation rates are agreed as being suitable to establish the impact of the Appeal proposals. The trip generation rates were provided by WCBC and were derived from recently conducted traffic counts at a relatively new housing development which has similar characteristics to the application site. The agreed trip rates are contained in Table 7.5 of the TA.

6. Trip Distribution

The directional distribution of the traffic associated with the proposals has been assigned to the local highway network in line with the observed vehicle movements, which is considered to present a suitable approach. The highways officer also requested confirmation of the split of traffic at the site access which can be confirmed as being 10% to the east and 90% towards the village which can be considered to be robust.

The trip distribution utilised for the TA is therefore agreed.

7. Trip Distribution (Altered to take account of the potential TRO scheme)

During discussions, it was understood that WCBC were seeking to implement a series of traffic regulation orders within the village which included a change in direction of flow at the B5445 Chester Road/The Green junction, meaning vehicles would have only been permitted to travel southbound. This in turn would have meant that traffic previously using this link from Rossett Road to the B5445 northbound, would then have been required to utilise the junction of the B5445 Chester Road/B5102.



In light of the above, the submitted revised TA included an additional set of assessments based on the above changes in traffic and presented the subsequent capacity analysis as a 'sensitivity' test. The assessments demonstrated that the proposed development would not give rise to any junction capacity issues, even with the proposed TRO's in place. This was confirmed by the highways officer who stated in his response that:

"Junction assessments (Picady) based on the existing and proposed one-way system have been provided. The assessments indicate that the existing junctions will still operate with reserve capacity with or without the proposed changes for a future year of 2028 with the proposed development".

While it has since been confirmed that the works are no longer being progressed, it should be noted that the additional assessments undertaken demonstrated that the impact of the development will not be material and that development traffic could continue to be accommodated on the local road network, should those works be re-introduced in the future.

It is therefore agreed that the proposals will not have a material impact on the local highway network.

8. Traffic Flows

The use of the 2015 surveyed flows and the manual assignment of traffic growth using the National Traffic Model (NTM) factors adjusted by the TEMPRO regional and local growth factors for Wrexham provides an acceptable analysis of traffic conditions.

The base and future year scenario flows are therefore agreed.

9. Traffic Impact

It is agreed that the proposals will not have a detrimental impact on the operation of the highway network or give rise to road safety issues, subject to the proposed footway improvement works being implemented along the B5102 Holt Road in accordance with drawing ref no. 0807-04 REV B, which the highways officer has confirmed "... is considered to enhance pedestrian safety along Holt Road".



10. Access into the Sites

Vehicular access to the site will be taken from two locations on Rossett Road, with one serving the northern site and the other serving the site to the south.

The proposed junction layouts show that visibility splays of 2.4 metres by 70 metres can be achieved in both directions from each access, which are commensurate with traffic speeds of 30mph based on the guidance set out in DMRB. The highways officer has confirmed in the latest correspondence that:

"It would be possible to provide the required visibility splays based on speeds of 30mph for both proposed access points subject to modifications to the existing hedgerow". The proposed site access junctions are shown in Drawing ref no. 0807-F03 REV D.

It is therefore agreed that the proposed points of vehicular access are suitable in their design and form to serve the development.

All transport and highways matters are now agreed.

Signed.....

Date..... 15/05/19

By **Phil Wooliscroft** of Croft Transport Solutions on behalf of the Appellant (Bellis Bros Ltd)

Signe

Date..... 14/05/19

By **Peter Douthwaite** on behalf of the local highway authority (WCBC)

**Wrexham County Borough Council Local Development Plan 2013-
2028**

**Policy H1 Non-Strategic Site Delivery Statement
Site 17: Land at New Road, Rhosrobin**

SITE DETAILS		
Site Reference	17	No. of units
Site Address	79	
Land at New Road, Rhosrobin		

SITE STATUS	
Is site vacant or when is it likely to come vacant	Yes
Land ownership/legal	Option to purchase subject to Planning Permission
Developer Interest	SG Estates

CURRENT PLANNING STATUS
Pre App Enquiry
Statutory Pre-Application Consultation
To be undertaken late 2019
Planning Application(s)
To be submitted early 2020
Planning Appeal(s)
Commencement of development
Late 2020

SITE DELIVERABILITY										
2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028
			10	25	25	19				

Completed by:

On behalf of: SG Estates Ltd

Date: 19th August 2019