

WREXHAM COUNTY BOROUGH COUNCIL
DEPOSIT LOCAL DEVELOPMENT PLAN REPRESENTATION
SUPPLEMENTARY STATEMENT
LDP EXTENSION PERIOD

In relation to:

PENDINE PARK INDEPENDENT LIVING

On behalf of:

PENDINE PARK CARE ORGANISATION

PENDINE PARK

SUMMERHILL ROAD

WREXHAM LL11 4YE



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1. INTRODUCTION

This supplementary statement regarding Pendine Park and the emerging draft LDP is in addition to and associated with our main representations submission deposited with Wrexham County Borough Council on the 31st May 2018.

This supplementary report dated 9th July 2018 should be read in conjunction with our main representation report dated 30th May 2018.

This supplementary report raises further issues, conflicts, omissions and shortfalls within the emerging LDP relative to Social Care, specialised Care and Employment within the Green Wedge relative to Pendine Park based on the recently published :

- Welsh Government “Prosperity for All – Economic Action Plan”,
- The ICF Report “The Economic Value of the Adult Social Care sector – Wales, final report dated 5th June 2018” ,
- Social Care Wales’ news report “Social care for adults contributes more than £2 billion to the Welsh economy” dated 5th June 2018,
- “The Parliamentary Review of Health and Social Care in Wales – A revolution from within: transforming Health Care in Wales” Final report dated January 2018
- The Wrexham County Borough Council “Workforce Development – Social Care Workforce Development Programme endorsed by the Director of Social Services 2018/2019”
- The Wrexham County Borough Council “Workforce Development – Social Care Workforce Development Programme – End of Year Monitoring Report 2017/2017”
- BP-10 Spatial Strategy & Distribution of Development – protection of existing employment land policy EM-1
- Wrexham Viability Report 2017
- BP-07 Employment Land Report
- Tan 23 – Economic Development
- North Wales Economic Ambitions Board report July 2016 “A Growth Vision for the Economy of North Wales”
- Wrexham LDP 2013-2028 Topic Paper 5 – Health & Wellbeing dated Feb 2016
- WCBC and Wrexham Local Health Board report “Caring for our Health 2005-2008”
- Social Services and Well-being (Wales) Act 2014
- The North Wales Grow Bid 2016 (of which WCBC is a contributor)
- Ministerial Directives and Task forces
- “Paying for Social Care” An independent report commissioned by the Welsh Government – by Professor Gerald Holtham – June 2018

2. ISSUES

- 2.1 Our initial Representation Report dated 30th May 2018 highlighted that the emerging Local Development Plan (LDP) falls short of recognising the important and large economic / social / welfare / employment contribution the private health care sector makes in Wales, and that the LDP and associated supporting reports collectively make very little reference to Healthcare and Specialised adult/elderly care anywhere.

BP-07 Economic Development mentions “Health Care” once in its 44 pages, and worst still the Wrexham Employment Land Review (ELR) final draft March 2015 discusses Health Care on two thirds of a page (page 266 – paragraphs 9.39 and 9.30) in its 658 page content.

The Employment land review and Wrexham CBC Viability Study (January 2018) make numerous recommendations for protection of existing employment land but only for traditional Industrial or warehousing or office locations. Nothing is allocated for private health care, that contributes so much to the local economy and employment numbers.

Many of the protected industrial estates included in the LDP are small or have limited employment numbers, and significantly less employment or employment opportunity than Pendine Park.

For example, the Wynnstay Technology Park that accommodated Wrexham Mineral Cables, employs no more than 100 people, but is protected, whereas Pendine Park employing over 500 is not protected.

Another is Gardden Industrial Estate, housing very small units and offering limited employment numbers and little expansion capacity, whereas Pendine Park offers over 500 employment places and can expand within its current boundaries to offer significantly more employment and education of local people.

Protection of existing employment land is embodied in LDP report BP-10 “spatial strategy & distribution of development”, and it includes as one of its goals under policy EM1 the protection of existing employment land. It would appear policy EM1 has overlooked Pendine Park, and it should be amended immediately to ensure that Pendine Park is included as a protected major employment site in the Authority’s area.

- 2.2 Pendine Park is the largest private Care provider in North Wales and one of the largest in Wales. It’s Director, Mr Mario Kreft, is highly regarded in the industry and advises the Welsh Government on a number of boards and panels with regard to best practice, future needs and trends, and the improvement of Care services in the Welsh Economy.
- 2.3 Pendine Park, and one of the largest employers in Wrexham, contributes significantly to the economy of the area, but also provides formal established educational training to its staff as well as having established the Pendine Academy of Social Care which is linked to a number of further educational facilities in the North Wales region. The Academy is very highly thought of and is a very important facility regionally and Nationally, as can be seen by the following recommendations by Welsh Cabinet Ministers:

The Academy was officially opened in October 2017 by Wrexham AM Lesley Griffiths and Ken Skates, the Welsh Government's Cabinet Secretary for the Economy and Infrastructure. The First Minister identified social care as one of just a handful of priority themes for the whole of Government to focus on and said "Our contribution in the Economy Department will be to make care a national foundation priority sector so we can get to a point in the future where Wales is seen as the best place in which to receive care, the best place to grow old in a secure, dignified and safe way. Pendine Park's contribution to that agenda is crucial."

Lesley Griffiths, who is also the Cabinet Secretary for the Environment and Rural Affairs, said: "Pendine Park provides the gold standard for social care. Their commitment to high quality training is an example to the whole sector and their continued investment in the Pendine Academy of Social Care will help them raise the bar yet again"

The launch by Ken Skates of the Welsh Government's Policy "Prosperity for All: economic Action Plan" last month identifies Care as one of the five key services the Welsh Government are supporting as being the greatest contributors to long term prosperity and well-being in Wales.

- 2.4 Pendine Park is not identified in the LDP as a major employer, and the site is not protected under the LDP as employment land, even though it employs over 500 staff and has a programme of future development that will generate significantly more skilled employment opportunities on site for the local community. It is also the largest private service provider to the Besti Cadwaladr University Health Board and Wrexham CBC Social Services.

To allow future planning of improvements in services, employment and education at Pendine Park, it is wholly reasonable in planning terms to expect that the site of one of the largest employers in the area is given the same existing employment site protection, and not the restrictive washed-over Green Wedge allocation presently proposed as part of the LDP.

The Initial report sets out the normal planning controls that can adequately shape appropriate development at Pendine Park without the burden of Green Wedge Policy. This supplementary Statement stresses how the site should be afforded existing employment site protection in the same way as many of the other smaller sites have been under BP-10.

Appendix 1: Settlement Constraints Summary states:

Green wedges need to be amended to enable growth and allow the town to expand.

This is true at Pendine Park, without the security of planning policy support for this major employment site it makes forward planning for the care services and facilities very difficult, and the ability to generate Economic prosperity and well-being will be hampered by unnecessary planning constraints.

- 2.5 LDP BP-07 Employment Land Report cites the Regional Policy Context of the North Wales Economic Ambition Board under item 2.13 as:

2.13 Wrexham along with the other five local authorities in North Wales, the private sector, higher and further education and third sectors has joined the North Wales Economic Ambition Board (NWEAB) and has adopted a growth vision for the economy of North Wales to 20351. The aims are to improve the economic, social and environmental well-being of North Wales, to support and retain young people in the region, address worklessness and inactivity, support

and enable private sector investment in the region to boost economic output and to create new job opportunities. In broad terms, the vision is to grow the value of the economy by 2.8% per annum to £20 billion and to create over 120,000 new job opportunities. There will be many different ways in which the partners try to deliver this vision including the growth deals for North Wales and Cheshire and Warrington – both of which support key investment in Wrexham which are consistent with the vision and strategic objectives of the Deposit Plan.

Clearly there is overriding evidence that private care providers are a significant contributor to the economy in North Wales, and Pendine Park is the largest. It does not make good planning sense to stagnate an award winning business by the wrong policy application for its site. The Green Wedge over-wash should be replaced by a protection of existing employment for Specialised Care facilities and education.

- 2.6 “Paying for Social Care” An independent report commissioned by the Welsh Government – by Professor Gerald Holtham – June 2018 states in section 1.2 that:
Local authorities in Wales currently pay over £550 million each year for social care of the elderly. There are reasons to believe that this sum is inadequate to meet current demand while providing services of the required quality. Moreover, demand is certain to increase owing to demographic trends, entailing a growth in the numbers and the proportion of elderly people in the population.

Future private investment by Pendine Park is already planned, but it needs the support of the emerging LDP to plan ahead. The existing infrastructure at Pendine Park allows the business to gain an advantage and offer services to the Local Community and WCBC Social Services and reduce the future expenditure needed by Councils because the basic framework of the care provisions are already there at Pendine Park. Welsh Government and WCBC policies are committed to get best value for money, and Pendine Park offers that economy of scale. To lose a facility such as Pendine Park would be a major economic drain on local finances.

- 2.7 Guidance in Tan 23 is clearly relevant to Pendine Park and the need to afford special planning status and employment land protection to the whole of Pendine Park site, including Tan 23 policy guidance which states:

4.3 *An economic vision*

4.3.1 In producing Local Development Plans, planning authorities are expected to develop a broad vision for their Plan which must be consistent and coherent so that the economic, social and environmental considerations support each other and point in the same direction. The economic vision must therefore be consistent with other aspects of the Local Development Plan such as housing and transportation. An economic vision is part of the LDP vision; it is not separate to it.

Taking “Prosperity for all: economic Action Plan” into account, clearly the economic vision and guidance for supporting Care facilities should be given much greater importance in the emerging LDP, and we strongly recommend that WCBC include significantly better policy guidance for Care provisions in the LDP, and safeguard Pendine Park as a protected employment site in the same way other smaller traditional industrial sites have been in BP-10.

4.3.3 In developing an economic vision, authorities should bring together studies and strategies on all sectors of the economy, including non-B sectors, such as retail and tourism.

It is clear that the emerging LDP has not accounted for “Prosperity for all: economic Action Plan”, nor the duties imposed on authorities under the Social Services and Well-being (Wales) Act 2014 to promote best practice in Care facilities and services. Therefore, the LDP falls short of its dutiful requirement to be inclusive of all regional and National Welsh policies, and should be amended accordingly

4.3.5 In developing their economic visions, local planning authorities should assess current and future business requirements, considering potential new inward investment opportunities and new start-ups as well as established local firms. They should search for opportunities to create better and more competitive business locations, responding to business requirements and filling any gaps in supply.

Tan 23 requires Local Authorities to be responsive to business requirements, and Pendine Park, as one of Wrexham's largest employers, has specific requirements that need the Green Wedge allocation to be removed, and protection of existing employment allocation put in its place. Future planning development is needed at Pendine Park to respond to increasing population and Social/Elderly care facilities, and all this can be accommodated at Pendine Park without threatening the character of the wider countryside around it, and will not generate conditions that induce a merging of Wrexham with Gwersyllt.

The economic and social benefits to the local community far outweigh the simplistic green wedge policy provision in this instance, and should, on planning balance, ensure that Pendine Park is given special case employment land protection for the whole site As cited below in section 4.5 of TAN 23:

4.5 Employment land provision

4.5.1 LDP employment land targets should aim to ensure that planning meets the demand for land, so that economic growth is not constrained by lack of land.

4.5.3 In setting targets and in considering specific sites, planning authorities should assess the likelihood of these adverse effects and balance them against the economic benefits of identifying employment land.

- 2.8 Table ES3 of the Wrexham Viability Report 2017 on page 65 states for Bradley, Rhosrobin, New Rhosrobin Gwersyllt and Summerhill that it's priority is also to protect existing Employment Areas – and therefore Pendine Park, and a major employer in these areas, should be included as a protected Employment site.
- 2.9 The Social Care Wales report on the contribution to the Welsh Economy by Social Care identifies the sector contributes £2.2 billion to the Welsh Economy. Pendine Park is the largest provider in North Wales and one of the largest in Wales, and is therefore a significant contributor to the economy of Wrexham County Borough and the local wellbeing of the community.

- 2.10 The ICF Report “The Economic Value of the Adult Social Care sector – Wales, final report dated 5th June 2018” similarly identifies the significant contribution the Care sector makes to the economy, and it is this which Ken Skates has identified as one of the 5 major sectors to receive Welsh Government support as future contributors to Economic Improvement and well-being (see Welsh Government Policy guidance “Prosperity for All – Economic Action Plan). The emerging WCBC LDP does not include any policy reflection of this, and therefore the LDP is wanting and needs to be amended, and also to include Pendine Park as one of its major contributors and allocate the site appropriately in order to safeguard future development.
- 2.11 “The Parliamentary Review of Health and Social Care in Wales – A revolution from within: transforming Health Care in Wales” Final report dated January 2018 offers similar guidance and conclusions, and the principles of the protection and nurturing of the Care Sector is not embodied in the emerging Wrexham LDP, and therefore the LDP needs to be updated and amended to reflect this very important change in Welsh Government support towards the Care Sector.

3. CONCLUSION

- 3.1 In combination with the original representation report, this supplementary report highlights the shortfalls of the emerging Wrexham County Borough Council Local Development Plan in relation to both the Care Sector in its own community, and the failure to recognise the Welsh Government policy directions via various recent reports to give heightened importance to the Care Sector and Community care facilities.

Pendine Park is the largest private care provider in North Wales. It is the main care provider in Wrexham County Borough. It Employs over 500 staff at Pendine Park alone, and yet the site is not given existing employment protection status, and the current proposal of Green Wedge allocation will certainly be harmful to the future prospects of the business, to the future employment generation and educational development of the Pendine Academy.

Pendine Park is an award winning major employer in the area, that had been established in Wrexham for decades, and seeks the correct planning allocation for its site to support future development of Care services, education and employment for the benefit of the local community.

We respectfully urge the Council to amend the policy allocation at Pendine Park to protect and safeguard its future and that of its employees and the local community that depend on its services.

4. APPENDICES

Links

<http://gov.wales/docs/strategies/170919-prosperity-for-all-en.pdf>

<https://socialcare.wales/news-stories/social-care-for-adults-contributes-more-than-2-billion-to-the-welsh-economy>

<https://gov.wales/topics/health/nhswales/review/?lang=en>

<https://gov.wales/docs/desh/policy/140207tan-23-economic-development-en.pdf>

<http://senedd.assembly.wales/documents/s63190/EIS5-13-17%20p5%20North%20Wales%20Economic%20Ambition%20Board%20NWEAB.pdf>

<http://senedd.assembly.wales/documents/s63190/EIS5-13-17%20p5%20North%20Wales%20Economic%20Ambition%20Board%20NWEAB.pdf>

http://www.legislation.gov.uk/anaw/2014/4/pdfs/anaw_20140004_en.pdf

<https://gov.wales/docs/dhss/publications/180116reviewen.pdf>

https://socialcare.wales/cms_assets/file-uploads/The-Economic-Value-of-the-Adult-Social-Care-Sector_Wales.pdf

<https://gov.wales/docs/strategies/170919-prosperity-for-all-en.pdf>

<https://gov.wales/docs/det/publications/171213-economic-action-plan-en.pdf>