



Vacant Industrial site at Mold Road, Gwersyllt, Wrexham LL11 4AF

PROPOSED LOW SECURE UNIT AND GENERAL HOUSING

PRE-APPLICATION CONSULTATION REPORT

ISSUE 01

Dated 03.11.2017

2.0 PUBLIC CONSULTATION

2.1 The Process

In accordance with Part 1A of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, the development proposals have been publicised and consultation has also taken place with community and specialist consultees.

Notices defined under Articles 2C & 2D were served on relevant parties with Schedule 1B of the Town and Country Planning (Development Management Procedure) (Wales) Order 2016 posted adjacent to the site on 30th June activating the 28 day consultation period which subsequently expired on 28th July 2017 (See Appendix A for copies of Schedules 1B & 1C). The site notice included details of the website link from which the scheme drawings and documents could be accessed and viewed. A CLA representative visited all of the local businesses and residential properties adjacent to the development site, at the time the notices were posted, and spoke with representatives and occupants where available.

Further to the above, paper copies of all information available to view on the website were sent to the following consultees:

Community Consultee		Address	Summary of Response Received	Date Rcvd
C1	Mr & Mrs Hall (Highfield)	Mold Road, Wrexham LL11 4AF	No response received	N/A
C2	Mr Whitehead (The Gables)	Mold Road, Wrexham LL11 4AF	No response received	N/A
C3	Willcroft	Mold Road, Wrexham LL11 4AF	No response received	N/A
C4	Mr & Mrs Rutter (Hillcrest)	Mold Road, Wrexham LL11 4AF	No comment regarding proposals but query regarding sale of own land for additional development.	04.07.2017 (Phone Call)
C5	North Wales Beds	Mold Road, Wrexham LL11 4AF	Concerns raised regarding the un-adopted road at the site entrance including flooding, repairs and potential damage to North West Beds building in close proximity to passing vehicles/construction traffic.	27.07.2017 (Email)
C6	Elizabethan Patio Doors	Mold Road, Wrexham LL11 4AF	No response received	N/A
C7	Gwersyllt Sports & Working Men's Club	Mold Road, Wrexham LL11 4AF	No response received	N/A
C8	Kent Supplies	Mold Road, Wrexham LL11 4AF	No response received	N/A
C9	Capital/Heart Radio	Mold Road, Wrexham LL11 4AF	No response received	N/A

C10	Carpets 2 U (Unit 1)	Westminster Trading Est LL11 4AF	No response received	N/A
C11	Rest N Easy (Unit 2)	Westminster Trading Est LL11 4AF	No response received	N/A
C12	Acorn Antiques (Unit 5)	Westminster Trading Est LL11 4AF	No response received	N/A
C13	Shefley's Car Sales (Unit 7)	Westminster Trading Est LL11 4AF	No response received	N/A
C14	Ysgol Bryn Alyn	Church Street, Wrexham LL11 4AD	No response received	N/A
C15	Gwynn Evans Leisure Centre	Heol Cefm, Wrexham LL11 4MG	No response received	N/A
Specialist Consultee		Address	Summary of Response Received	Date Rcvd
C16	Councillor Barry Warburton - Gwersyllt North	14 Third Avenue, Wrexham LL11 4EF	No response received	N/A
C17	Environment & Planning - Highways	Wrexham Industrial Estate, Wrexham LL13 9PW	Transport Assessment required with application, adopted highways issues and highways improvements to be considered.	28.07.2017 (Email)
C18	Environment & Planning - Public Protection	Ruthin Road Wrexham LL13 9NU	No response received	N/A
C19	Natural Resources Wales	Ffordd Penlan, Bangor LL54 4ED	Formal response letter received by email 01.08.2017 stating no objection to an application, but recommends that a surface water drainage strategy should be produced at the planning application stage to support the development proposals.	01.08.2017 (Emails)
C20	Welsh Water - Developer Services	PO Box 3146 Cardiff CD30 8EH	Formal response letter regarding drainage proposals to be considered when completing drainage strategy for formal planning application.	14.07.2017
C21	Gwersyllt Community Council	Via Email Only	Council Members raised a number of queries and concerns at July meeting of Gwersyllt Community Council.	26.07.2017 (Email)
C22	Planning Services - Community Development	Via Email Only	No response received	
C23	Stacey Inglis - Contaminated Land Officer	Via Email Only	Formal response letter confirming recommended planning conditions relating to contaminated land surveys.	21.07.2017 (By Email)

2.2 Community Consultee Responses

Of the 15No neighbours contacted, 2No responses were received within the consultation period:

2.2.1 Ref C4: Hillcrest, Mold Road, Wrexham LL11 4AF

Mr & Mrs Rutter of Hillcrest made contact via the website link confirmed on the Site Notice on 03.07.2017, requesting a call back. In a telephone conversation between Mrs Rutter and CLA on 04.07.2017 she provided no comment regarding the development proposals but enquired whether the developer of the housing would want to purchase their rear garden.

CLA Response: Query passed to the applicant for consideration.

2.2.2 Ref C5: North West Beds, Mold Road, Wrexham LL11 4AF

David Griffiths the Director of North Wales Beds emailed CLA on 27.07.2017 following receipt of the proposals:

We have a number of concerns and would like clarification, and assurances on a number of issues.

The number and weight of vehicles carrying heavy loads within a close proximity of our building which at the top end is only 7' away from the road, please see attached your image provided. Our concern being detrimental effect to our building structure.

We also have a major concern with drainage due to both sides of the road (at the bottom of the same image) flooding due to downpours. This does have a bearing on us as it flows into our car park. Our other concern with this, is what if the weight of the vehicles cause structural overload or excessive blockages which could force water or even sewerage through into the bottom of our Showroom.

Access is another concern, our entrance to the car park is a virtual direct turn right after turning in, from the Wrexham direction. This needs to be kept open at all times for customers and delivery vehicles to our store. There is also a safety issue as cars turning in off the Mold Road could back up into the main carriageway.

We believe that this is the only artery to your proposed site and is an un-adopted road from the main road to the top of the hill, no one takes responsibility for repairs or maintenance. Does this mean that when your work is completed that this could possibly be left in a bad state of repair with no organisation taking responsibility.

As you will appreciate we are a small business who have been at this site for nearly 27 years and are extremely concerned about the consequences of your proposal may impact on our livelihood. We would like to propose a meeting on site with your representatives relating to those issues and look forward to your comments. Please would you reply immediately to acknowledge that this email has been passed onto the relevant department.

CLA Response: Acknowledged receipt, queries to be considered and passed on to the applicant.

2.3 Specialist Consultee Responses

Of the 8No specialist consultee's contacted, 5No responses were received within the consultation period:

2.3.1 Ref C17: Environment & Planning – Highways, Wrexham Industrial Estate, Wrexham LL13 9PW

Pete Douthwaite Senior Development Control Engineer confirmed in an email dated 28.07.2017:

There are a number of currently unoccupied buildings standing on the site which were formerly used by the Council Environment department. If these buildings were occupied again under a B2/B8 use they could potentially generate approximately 200 vehicle movements per day. It is unclear from the submitted plans what level of traffic will be generated by the latest proposal. Any planning application should therefore include a transport assessment to consider any relevant highway issues at the site.

The road from the A541 Mold Road leading up to the site is not adopted highway. To the northern edge of the road there is an intermittent 1m wide footway reducing gradually down in width to nothing outside the working means club. To the southern edge there is intermittent footway again of substandard width. There is no street lighting on the road. Evidence would suggest that the road is inadequately drained as there is regularly a large pool of water where it meets the adopted highway. There are a number of HGVs / forklift trucks from the Kent supplies site which regularly reverse or park on the un-adopted road as they load and unload supplies.

Any new proposal should therefore consider how to resolve the adopted highway issues by undertaking a scheme of highway improvements to bring the road up to a standard suitable for adoption. Pedestrian provision could significantly improve by introducing a footway to both sides of the access road. Street lighting, drainage and road construction should all be upgraded to ensure the access is suitable for both residential and industrial use.

A scheme of double yellow road markings would ensure that vehicles are not parked on the highway in the vicinity of the bend near Kent Supplies. Any proposals should demonstrate how pedestrian routes from the site will link to existing PROWs to the east and towards Bryn Alyn school.

CLA Response: The comments raised have been passed on to the applicant for consideration. A Transport Statement and Access Proposal will be submitted as part of the formal planning application.

2.3.2 Ref C19: Natural Resources Wales, Ffordd Penlan, Bangor LL54 4ED

In emails dated 07 & 11.07.2017 between CLA and Gareth Thomas of Natural Resources Wales, the historic Site Investigation Report was provided for review and confirmation made that a drainage scheme and ecology report to be provided as part of the Planning Application.

Formal response letter received by email 01.08.2017 confirming:

*We would have no objection to an application, but recommend the following be included within any planning application:
Recommendation – a surface water drainage strategy should be produced at the planning application stage to support the development proposals.*

Additional comments also contained within the letter refer to consultation with the Contaminated Land Officer and Local Authority's Ecologist.

CLA Response: A drainage scheme will be completed and submitted as part of the formal planning application. Consultations with the Contaminated Land Officer and Ecologist have also taken place during the consultation period, pre-application.

2.3.3 Ref C20: Welsh Water - Developer Services, PO Box 3146 Cardiff CD30 8EH

Formal response letter sent by Owain George, Planning Liaison Manager on 14.07.2017 confirming:

Having reviewed the details submitted I would advise there is no objection to the proposed development and offer the following standing advice which should be taken into account within any future planning application for the development. . . [advisory notes given regarding sewerage and sewerage treatment]

CLA Response: The guidance raised by Welsh Water will be considered when completing the drainage design which will be submitted as part of the formal planning application.

2.3.4 Ref C21: Gwersyllt Community Council

Council Members raised a number of queries and concerns at July meeting of Gwersyllt Community Council which were confirmed in an email dated 26.07.2017 sent by Peter Mullen:

- *Will the proposed low Secure Unit cater exclusively for local people?*
- *Who will manage/run the Unit?*
- *The project description and design statement indicates that the Unit will provide care and treatment for people with mental health problems . . . The Council would welcome more information, please, as to the types of mental health problems the Unit will be dealing with.*
- *The Council has concerns about the potential impact of your proposals for the site on traffic and road safety having regard particularly to the nearness of the site to the busy Mold Road.*

- *In addition, concerns have been raised about the nearness of the site to licensed premises particularly if the Unit will be caring and treating people with alcohol addiction problems.*
- *Could you elaborate on the staffing arrangements for the proposed Unit please? . . . Will there be onsite security throughout the day and night? . . . What physical security measures will be place?*
- *Have you taken account of the Local Development Plan in bringing forward your proposals for the site?*
- *Will your housing proposals make provision for affordable housing?*

CLA Response: Full responses provided by the applicant and sent by CLA email, including the following summarized points:

- Residents will be from the local and wider community; the Low secure Unit is designed to address such a need, as people requiring this service currently being sent to units outside the area due to the shortage of local facilities. The intended outcome of the Low Secure services is to rehabilitate residents, allowing them to move on to supported living or open rehab units, again in the local area.
- The low secure units are intensively staffed and focus on challenging behaviour, rehabilitation and positive risk taking to reduce lengths of stay to be able to achieve safe discharges in a timely manner. The multi-disciplinary clinical team includes clinical psychologists and assistants, forensic psychologists, consultant psychiatrists, nurses and support workers.
- A low secure unit is a specific NHS standard, though there are differences in the client group, treatment etc. The key word is secure i.e. the residents are held in a secure environment under the Mental Health Act, with 3 metre high perimeter security fencing, controlled access though double locked lobby doors and so on. The whole purpose of the Low Secure standard is that both residents and public are kept safe. In a significant proportion of cases, the security is needed more for the residents than the public, as part of the care relates to potential self-harming. They are not therefore able to leave the facility freely, and local pubs or licenced premises will not therefore be an issue.
- Given that the facility is residential, it is staffed 24/7 on a shift basis. This provides additional security to all.
- The road junction has been analysed and considered by the Highways Department and the Applicant's Highways/Transport consultant and found to be capable of taking the additional traffic. This has also been approved in connection with a previous housing application for the same site. The access road does however require improvements, including upgrading to adoptable standards and the addition of pedestrian footpaths.
- Approval of the housing proposals will be sought under an outline application and as such, details of the mix and tenure are not known and will be addressed when the housing is submitted for Reserved Matters application at a later date. It is very likely to include an affordable element.

2.3.5 Ref C23: Stacey Inglis, Contaminated Land Officer

Formal response letter sent by Stacy Inglis by email on 21.07.2017 confirming:

Our records indicate that the above development is located on land where several former uses were present that had the potential to cause contamination, such as the former Gwersyllt colliery, mining of coal & lignite, road haulage, railway sidings and the manufacture of concrete. In addition our records indicate that infilled ground / tip may be present on / adjacent to the site.

In light of this it will be necessary to condition any future consent so as to ensure that any potential contamination issues are adequately dealt with. I would recommend to the Planning Officer that the following conditions and notes to applicant be applied to any future consent that may be granted should the above applications be submitted.

Conditions:

CONTAMINATED LAND – PHASED INVESTIGATION

No development shall take place until a phased site investigation of the nature and extent of contamination has been carried out and submitted to and approved in writing by the Local Planning Authority. If any contamination is found during the site investigation, no part of the development shall commence until a scheme specifying the measures that will be taken to remediate the site to render it suitable for the development hereby permitted has been submitted to and approved in writing by the local planning authority. The site shall thereafter be remediated in accordance with the approved scheme. If during the course of development any contamination is found that has not been identified in the site investigation, no further development shall take place on those parts of the site where that contamination has been found until an additional scheme of remediation has been submitted to and approved in writing by the local planning authority for those parts of the site. The relevant parts of the site shall thereafter be remediated in accordance with the additional scheme of remediation.

VERIFICATION REPORT - CONTAMINATED LAND

Each part of the site subject to the remediation under the scheme(s) approved as part of condition @@ shall not be occupied/used until a Validation Report has been completed in respect of that part of the site and submitted to and approved in writing by the Local Planning Authority.

CLA Response: A Site Investigation Report will be submitted as part of the formal planning application, any conditions applicable should relate to the findings included within the report.

Note: Copies of all correspondence referred to above can be provided upon request.

3.0 CONCLUSION

Of all the consultation feedback received, no party has objected to the development outright and most of the responses offer advisory notes with guidance on the information to provide alongside the formal planning application. Feedback received can be split into the following categories:

- 3.0.1 Highways: Comments received under references C5 & C17 relate to site access and the un-adopted access road off Mold Road. These concerns will be reviewed in line with the access proposals which will accompany the Transport Statement to be submitted with the planning application. Reference will also be made within our Design and Access Statement, with all comments and feedback circulated to the consultees in the first instance.

- 3.0.2 Drainage: Comments received under references C19 & C20 refer to proposed drainage guidance which will be reviewed and where possible, incorporated into the proposed drainage scheme which will accompany the planning application.
- 3.0.3 Building Use and Management: Aside from Highways concerns as covered in item 3.0.1, the queries raised under C21 refer to the use and management of the proposed buildings. These queries are to be answered by the applicant and will also be covered in the Design and Access Statement.
- 3.0.4 Contaminated Land: As confirmed above, a Site Investigation Report will accompany the application in relation to the points raised under C23.

Where consultee's have requested further feedback and clarification, this will be followed up in due course and ahead of the formal submission.

SCHEDULE 1 Article 4.(4)
Pre-application notices

SCHEDULE 1B Articles 20 & 2D
PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
Town and Country Planning (Development Management Procedure) (Wales) Order 2012
PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
NOTICE UNDER ARTICLE 19(2) AND 2D

(to be served on owners and/or occupiers of adjoining, and the community consultees; and displayed by the notice on or near the location of the proposed development)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be published by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at (a) **VACANT SITE, MOLD ROAD, ABERYSTWYTH, WREXHAM, LL13 4AF**

I give notice that (b) **ASC REAL ESTATE INVESTMENTS LTD**

is intending to apply for planning permission to (c) **DEVELOP A 40 BED LOW SECURE UNIT WITH ADDITIONAL 14 BED REASSESSMENT UNIT, AND SOME GENERAL HOUSING**

You may inspect copies of

- the proposed application;
- the plans and
- any supporting documents

at (d) **www.gchsa.co.uk/news-storey/wrexham-low-secure-hospital/** and computer facilities are available to view the information and (e) **COMPUTER/INTERNET AVAILABILITY AT: WREXHAM LIBRARY, RHOSOU ROAD, WREXHAM LL13 1AW**

You may view this information at (f) **between the hours of (g) 10.00am to 5.00pm**

Any person wishing to make representations about this proposed development must write to the applicant (agent at (h) or (i) **ASC REAL ESTATE INVESTMENTS LTD, CONDY LOFTHOUSE ARCHITECTS (CL), UNIT 17, CONNECT BUSINESS VILLAGE, 24 DERBY ROAD, LIVERPOOL L5 9PY**

by (j) **28th JULY 2017**

Signed: **Paul Patten** **CONDY LOFTHOUSE ARCHITECTS** **LS 9PY**

Date: **28.06.2017**

CLA & MCL info@condylofthouse.co.uk

OR COMMENTS CAN BE MADE ON THE WEB SITE

Fig 1: Schedule 1B – Notice Displayed Adjacent the site.

SCHEDULE 1C Article 2D
CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
Town and Country Planning (Development Management Procedure) (Wales) Order 2012
CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
NOTICE UNDER ARTICLE 2D

(to be served on specialist consultees, as defined by article 2D(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012)

Purpose of this notice: this notice comprises a formal notice for a pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Proposed development at (a) **WREXHAM SITE, MOLD ROAD, WREXHAM, LL13 4AF**

I give notice that (b) **ASC REAL ESTATE INVESTMENTS LTD**

is intending to apply for planning permission to (c) **DEVELOP A 14 BED LOW SECURE UNIT WITH AN ADDITIONAL 14 BED REASSESSMENT UNIT AND SOME GENERAL HOUSING**

A copy of the proposed application, plans, and other supporting documents are available to be viewed online at (d) **www.gchsa.co.uk/news-storey/wrexham-low-secure-hospital/**

In accordance with the requirements of article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to (e) by (f)

Signed: **Paul Patten** **CONDY LOFTHOUSE ARCHITECTS**

Date: **28.06.2017**

Fig 1: Schedule 1C – Notice Served on Specialist Consultees.