

WREXHAM COUNTY BOROUGH COUNCIL
DEPOSIT LOCAL DEVELOPMENT PLAN REPRESENTATION

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

Pendine Park Nursing Home occupies a parkland area associated with a former country house demolished some decades ago. It was established by Mario Kreft MBE and his wife Gill.

Understanding that everyone is different and that needs can and do change over time the Pendine Park care services have expanded considerably.

Mario and Gill wanted to provide continuity of care and centres of excellence for niche care services. They have built a team of caring experts and offer a wide choice of individually tailored and specialist care services. These services cover all ages and look after people in their own homes, as residential clients and as respite and day care clients. Everyone has the care that is just right for the individual and their circumstances.

The nursing home has progressively expanded over a number of years since the first element of the complex was built, and now comprises a collection of main building elements grouped around the area of the original formal garden, the most recent of which, a resident's pavilion, was permitted in 2012 but not yet constructed.

The different buildings provide residential accommodation for all ages of adults with a wide range of medical conditions and nursing care requirements, including brain acquired injury, dementia, physical impairment and mental illness.

In total the nursing home provides living accommodation for nearly 250 residents, who are provided with a significant level of nursing, medication and treatment services on site including dementia care, and critical injury care and rehabilitation. Pendine Park works in conjunction with the Betsy Cadwaladr University Health Board (BCUHB) and Wrexham County Borough Council and social services for the accommodation and rehabilitation of patients, and assist in relieving a lot of the local burden the main service providers experience in the area.

Pendine Park is the largest private service provider to BCHUB and the County Borough Council in Wrexham and North Wales for dementia, specialist and elderly care and rehabilitation treatments.

With a growing and ageing population, the demand for centres of excellence such as Pendine Park is ever increasing, and there is a real need to ensure that the Authority's LDP makes appropriate and practical provision for the ongoing development of Pendine Park as a recognised special case support centre for the local and wider community.

The Census projection figures to 2035 indicate a 119% increase in elderly population in the area over the next 18 years, and confirms the largest growth will be in the 80+ age bracket. This will bring increased demand for specialist care services such as Dementia Care and other age-related ailments.

The proposed amendment of the draft LDP to include a specific care allocation for Pendine Park (within the landscaped former garden areas of the site) will safeguard the maintenance of current services and aid the development of future essential services at Pendine Park, will protect and encourage growth of local employment, and will allow further development of facilities and services to the overall benefit of the community in and around Wrexham.

Pendine Park Care organisation are the largest providers of care in Wales and also one of Wrexham's largest employers, with currently 350+ staff at Pendine Park, up to 50 staff at Bromfield House on the Wrexham Technical Park, and more than 100 staff at Bryn Seiont in Caernarfon.

As one of the largest employers in its sector in the region Pendine Park are proud of the ground-breaking work it has been pioneering over recent years, and has gained recognition and awards for the staff and owners alike.

Pendine Park also offer the local community workforce opportunity to study and gain additional qualifications at its specialist Pendine Academy of Social Care, and has long-standing educational and working arrangements with Coleg Cambria to provide in-house and external training courses. This educational training is supported and funded by the Welsh Assembly Government via Coleg Cambria, and offers an important centre of excellence for Social and Community Care training to local people in the Wrexham area.

The site, services and buildings have not been allocated within the draft LDP, and this report puts forward the case to safeguard the valuable provisions currently operating at Pendine Park by amending the draft LDP to allocate the site as a very special exception of great value within the green wedge between Gwersyllt and Wrexham.

Within the Wrexham County Borough Council area and wider North Wales and North West region, Pendine Park is a key strategic independent supplier of specialist care services and the largest of its kind working with the Betsy Cadwaladr University Health Board & Wrexham County Borough Council Social Services. The facilities and award winning infrastructure has been operational on site for over 30 years, and should be classed as a key strategic site for care services provision within the emerging LDP for the duration of the Local Plan and beyond.

2. The basis of this representation

Wrexham County Borough Council are developing their Local Development Plan (LDP) for the period 2013-2028.

Regulation 17 requires a six week statutory public consultation, inviting formal representations from stakeholders and public. This period extends from April 28th 2018 to May 31st 2018.

This specific representation relates to the site of Pendine Park on Summerhill Road, as identified on the following location plan.

The draft LDP does not show any recognition of the site as a designated business, Care centre, Community services facility, Employment area nor any other identifiable designated site area relating to the existing buildings & services at Pendine Park.

The site is washed over with a Green Wedge designation, with no differentiation as to the function of this locally important Care providing facility and centre of excellence. The restrictive nature of the Green Wedge policy will be fundamentally detrimental to the ability of Pendine Park to maintain existing services and develop new services to address the 119% population increase over the next 18 years.

This representation seeks a revision to the designation of the site to one appropriate to the ongoing use and function of the site, and also to safeguard future employment and business growth at Pendine Park, as is encouraged in other parts of the draft LDP (*see detail in following sections*).

Prosperity for All:

There is a newly published Welsh Government Economic Action Plan released on the 21st May 2018 by the Cabinet Secretary for Economy & Transport, Ken Skates AM, titled "Prosperity for All" that encourages all Local Authorities and public bodies to adopt the principles within the Action Plan to improve growth, the Welsh economic, Productivity, innovation and Skills. It seeks to improve the well-being of future generations, and identifies five priority areas of which Social Care, Mental Health and Skills & Employability are three. These three priority areas are already operational at Pendine Park.

The publication of "Prosperity for All" in September 2017 by the First Minister sets it as a National Strategy in Wales, and as a consequence, Wrexham CBC's emerging LDP should give it full recognition and make due allowances in the LDP structure to facilitate and support the key strategy targets contained in the Action Plan. This is an extension of, and supporting document to, the Well-being of future generations (Wales) Act 2015.

"Prosperity for All" states:

Planning decisions affect every area of a person's life. They determine where homes are built, where services are provided, and the quality of the local environment; and they promote sustainable economic growth and access to open space. The right planning system is critical to delivering our objectives in this strategy.

The way we plan our capital investment decisions can have a big impact on the economy, help different organisations to deliver their services in a single place, and minimise the individual's need to travel.

Throughout this strategy we commit to co-locate services and this can only happen if we integrate the way that we make our investment decisions.

Each year, devolved public services spend £6 billion procuring products and services, with more of this than ever being spent in Wales. By planning better and understanding which products and services are bought over and over again, we can support small and medium businesses to win more of these contracts. The economic benefits will stay in Wales, but our buying power can act as a springboard to develop greater added value to high performing businesses, and their supply chains, who can export products further afield.

Priority Areas

In developing the strategy, we recognised five areas which emerged as having the greatest potential contribution to long-term prosperity and well-being. They reflect the times in people's lives when they may be most in need of support, and when the right help can have a dramatic effect on their life course.

They are priority areas where it has been shown that early intervention - tackling the root causes, rather than treating symptoms - pays dividends. Only a fully co-ordinated response from public services can prevent problems escalating; too often barriers between different services and organisations stand in the way of a truly preventative approach.

If we are to realise the full potential of the Well-being of Future Generations Act, then integration and collaboration between services, with an early intervention and people-centred approach, is essential to delivering long-term outcomes. This is a significant change, and therefore we have decided to place particular focus on five priority areas where we believe, by improving how services are delivered, there can be the greatest initial impact, paving the way for further action over the longer term.

Early Years: an individual's experiences in childhood play a significant part in shaping their future, and are critical to their chances of going on to lead a healthy, prosperous and fulfilling life.

Housing: the bedrock of living well is a good quality, affordable home which brings a wide range of benefits to health, learning and prosperity.

Social Care: compassionate, dignified care plays a critical part in strong communities, ensures that people can be healthy and independent for longer, and is a significant economic sector in its own right.

Mental Health: one in four people in Wales will experience mental ill health at some point in their lives, getting the right treatment at an early stage, coupled with greater awareness of conditions, can in many cases prevent long term adverse impacts.

Skills and Employability: the better people's skills, the better their chances of getting fair, secure and rewarding employment, and the stronger the skills base is in Wales, the more chance we have of attracting new businesses and growing existing ones to improve prosperity.

These are by no means the limit of government's activities, and we will not lose sight of the day to day running of vital public services, while adapting and improving them to reflect this new approach.

Extract from Welsh National Strategy "Prosperity for All" Taking Wales Forward.

Pendine Park is already an established specialist Care provider in the Wrexham area, and offers important support to the Betsy Cadwaladr University Health Board and Wrexham County Borough Council social services. Providing an appropriate planning allocation to Pendine Park will assist in planning for the future, anticipating future demands and changes in care and expanding to address the increase in population over the next couple of decades.

Existing planning controls are more than adequate to manage development at Pendine Park, whereas the imposition of a Green Wedge policy over the whole of the site is fundamentally unhelpful to the operation of the care facilities, the employment opportunities and educational facilities on site.

The Government plan aims to increase efficiencies in the provision of care where government funding is involved, and Pendine Park offers an existing infrastructure on site to make best use of future investment and development.

The current trend in the Wrexham and North Wales area is that bed spaces within the independent specialist and dementia care providers are being lost. Numbers of bed spaces are falling, whereas the demand for bed spaces is increasing. One is not seeing investment in new first generation care facility developments offering this type of service, and new-build facilities are rare.

There are a number potential reasons for falling bed-space care capacity in the Wrexham and North Wales area:

- Many existing facilities are second or third generation centres that need increasing and substantial amounts of investment to bring them up to current day operational standards. In fact, just to keep 'still' in the market one needs to regularly invest, adapt and improve.
- Sustainability and planning pressures: locational sustainability is becoming a major consideration for the operation or development of care facilities when looking at new proposals, and existing out of town care facilities are suddenly finding themselves in unsustainable locations which go against new planning policies, and as a result find themselves not gaining development approval to keep up with demand and standards.
- Town and City Centre sites are already fully developed and have no space to develop further to keep up with standards
- The cost of operation for smaller providers becomes too high in relation to the set bed rates they receive as income
- Specialist care, such as Dementia care, head trauma care and other age related ailments require an enhanced level of support staffing and facilities to operate successfully, and the provision of these infrastructure services are costly, and put a consequential pressure on bed provision.

Pendine Park are one of the few care providers that are increasing bed spaces, and can still do so at Pendine Park with the correct support from Wrexham County Borough Council through the correct allocation in the LDP for the site.

Pendine Park offers existing site expansion opportunity with the benefit of on-site infrastructures that would be uneconomic to recreate as a wholly new-build care centre elsewhere. It makes complete planning, economic and social care sense to assist in the maintenance and development of specialist care facilities at Pendine Park for the duration of the LDP, and therefore the site should be allocated accordingly, and not over-washed as Green Wedge.

With the stringent planning constraints associated with Green Wedge allocation, Pendine Park will likely face increasingly difficult operational and economic circumstances, and may find itself needing to review its ability to provide dementia, trauma recovery and specialist care facilities at the site. It is vital that the LDP recognises the very special case Pendine Park offers, and the major contribution it provides to the Community, local employment, services to the Betsy Cadwaladr University Health Board and to Wrexham County Borough Council and social services.

Current indicators show that on average, a new care centre will cost in the region of £100,000.00 per bed-space to construct. To replace Pendine Park elsewhere on a new site would amount to in excess of £25million and require a site in excess of 4-5 Hectares. The infrastructure investment would be

significant and additional to the construction cost, and one would also need the site value added. Based on the Capital allowances currently operational in Wales, this would not be a viable option, even if Wrexham County Borough Council offered the site for free.

To this end, the existing Pendine Park sits very well with the policy aspirations of “Prosperity for All” where efficient use of sites and funding are combined with appropriate planning allocations to support existing businesses and care facility providers.

Pendine Park is an isolated and boundary-defined existing site that contains an important asset to the County in Economic, Employment and Care services terms. It is leading the field in many respects of care, and assists in relieving the burden on other public sectors. It offers excellent opportunities to the local community across a wide range of skills, and it is imperative for its existing and future operations that Pendine Park is recognised by planning use assignment as a site of very special circumstances set within the Green Wedge area and not washed over by it.

Improving the well-being & health of the local community by providing an ‘on the doorstep’ service in response to increasing local demand (as a result of increasing population and 65+ age groups) needs the support of the planning system via the emerging draft LDP, to ensure the safeguarding of existing employment along with creating growth opportunities in partnership with other local service providers.

The employment/care-residential designation of Pendine Park can be done alongside sympathetic protection, retention and improvement of the landscape, ecology and protectionist aspirations that form the basis of Green Wedges between main conurbations, and without jeopardy to the setting of the site in its wider environs. This would be wholly consistent with current activity on site.

3. The Site and Business

The site lies approximately 1Km to the North West of Wrexham, positioned between Wrexham and Gwersyllt (see below)



Pendine Park was formerly a country house with large gardens known as Pendine Hall. It was converted into an Hotel after the first world war, but then burnt down in the 1950's and was then demolished. The Welsh Development Agency obtained planning consent for a major Hotel on the site, but was never commercially developed. The site was then sold to the Pendine Park Care organisation and has been replaced by the Care & Nursing home complex currently occupying the site today.

The Care facilities have been in operation at Pendine Park for over 30 years by Mario and Gill Kreft, and has developed into a centre of care excellence, providing a wide range of different care services to Wrexham and the North West and Wales since their establishment in 1985.

Their guiding principles of dignity, independence, choice and fulfilment have always remained at the heart of everything they do at Pendine Park, and their commitment to the advancement of their staff training is equally ambitious, where their belief in the importance of great staff for great care led them to set up a dedicated Teaching Care Centre and to create innovative on the job training. This passion for staff development was recognised when Pendine Park achieved Investors in People Gold. They have also set up the Pendine Academy of Social Care educational facility, that is run in conjunction with involvement from Coleg Cambria.

Mario has worked voluntarily to improve standards in the care sector. Within Care Forum Wales he is responsible for social care policy and working relationship with the Welsh Government and other public, voluntary and private agencies.

He promotes issues relating to the social care workforce and is chair of the Wales Care Awards.

He sits on the 'Social Care Wales' ministerial board overseeing the new Social Services (Wales) Bill - Sustainable Social Services for Wales - and is the care sector representative on the advisory National Partnership Forum for Older People.

In 2012 Mario was awarded an MBE for his contribution to social care in Wales and the Welsh Government recently honoured him with a Recognising Achievement Award for his innovative work in health and social care. In 2011 he was named Caring Times UK Care Personality of the Year, the first Welshman to receive the award.

Mario has worked in the social care sector for 25 years. He was vice chair of the National Care Homes Association until 1993 when he left to co-found Care Forum Wales. Previously a member of the Care Council for Wales and the Central Council for Education and Training in Social Work (CCETSW), Mario is currently the Welsh representative on the board of Social Care Institute for Excellence (SCIE).

The benefits of all this work have been put back into Pendine Park. This, along with the wonderful staff and environment make Pendine Park what it is today. An award winning organisation people feel happy to be part of.

4. Allocation

It is important to recognise the excellent work being undertaken at Pendine Park, and the innovative and ground-breaking developments in care facilitation that originate at the site. The enviable list of Awards attributed to Pendine Park over the past 25 years is testament to the excellent facilities, training and care offered at this site on the outskirts of Wrexham. Pendine Park is Wales' largest independent provider of specialist care of this nature, including dementia care and head trauma recovery.

In order for this nationally important business to continue to develop, innovate, and lead the way in Care provision and training, it is vitally important to safeguard the opportunities to sensitively expand and develop at Pendine Park. There is currently no allocation shown in the emerging LDP for Pendine Park, and appropriate provision should be made for the site.

The “Prosperity for All” Economic Action Plan (May 2018) identifies Care as one of the four Foundation Sectors the Welsh Government actively support through the plan. They require stakeholders to embody the principles of the “Prosperity for All” Economic Action Plan into their own cross-governmental enabling plans, and clearly this would and should include the emerging LDP being prepared by Wrexham County Borough Council.

One recognises that the draft LPD and all supporting reports and documents were written before the release of the “Prosperity for All” Economic Action Plan (May 2018), and so, the emerging LPD should be amended to include recognition of the “Prosperity for All” Economic Action Plan and in particular for Pendine Park, the care sector.

We would therefore argue on reasonable planning grounds that the current draft of the LDP is not sound because it has not included for the inclusion of the “Prosperity for All” Economic Action Plan and therefore would be failing to address a key Economic Plan by the Cabinet Secretary for Economy & Transport (Wales) and inter alia the First Minister’s National Policy “Prosperity for All”

It is very difficult for the business to plan ahead and raise long term finance without the security of planning policy support, and can only presently plan on a piecemeal basis with each application having to be separately justified and fought for in a reactionary rather than planned manner. Positive planning policy support will assist the current and future care and employment provision at Pendine Park.

The washed over Green Wedge currently shown for the site should be amended to reflect Pendine Park’s very exceptional circumstances, so as not to constrain future healthcare advancement, gains in employment and support of this locally important business.



The site is clearly an unique existing facility in the landscape location, which is, and will always remain, a contained special use development that is beneficial to employment, services, health and education in the area.

The emerging LDP makes reference to the 'Wellbeing of Future Generations (Wales) Act 2015' that prioritises the aspiration to secure "A Society where mental well-being is maximised", and Pendine Park is a leading example of good practice and leading care provision in the region and country. Making sure the emerging LDP allocates this site to safeguard the business, employment and health care is necessary to ensure ongoing care development and education.

The emerging LDP includes Care for the Elderly as an Infrastructure provision under the Planning Act 2008 part 3 (see EB101 – Wrexham LDP 2013-2028 Infrastructure Plan 2017 Table 1), as it does for Education, Hospitals and Health Care – all of which are attributable to Pendine Park.

Pendine Park is a sustainable location in terms of access and public transport, with it being less than 1Km from a wide range of shops, the Glyndwr University, and is directly on the No21A bus route from Summerhill to Wrexham City Centre and links-in directly with Wrexham Maelor Hospital. Pendine Park has a range of on-site provision for residents.

The Wrexham Strategic Green Wedge Review (Oct 2017) provision and purpose within the emerging LDP is to:

- prevent the coalescence of large towns and cities with other settlements;
- manage urban form through controlled expansion of urban areas;
- assist in safeguarding the countryside from encroachment;
- protect the setting of an urban area; and
- assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Section 8 of this report will deal with each element in specific relation to Pendine Park.

5. Why Change

The whole of the Pendine Park site is currently washed over as Green Wedge in the Emerging LDP, and it would appear that the function, size and importance of Pendine Park as the main provider of specialist care and partner to the Betsy Cadwaladr University Health Board, and Wrexham County Borough Council Social Services has been forgotten as a result in the LDP. Restriction through inappropriate planning policy allocation will have a significant and almost immediate negative impact upon the running of the business, along with creating restriction on employment and education.

Surely, the restrictions applicable to Green Wedge policy are not intended to stifle important local service providers, and our submission requests that Pendine Park is properly recognised in planning use terms as a specifically identified and very special circumstance site within a surrounding Green Wedge but not be covered by it.

Application of Green Wedge policy restrictions to Pendine Park will make business growth, increased employment, increased healthcare and advancement in educational standards an unnecessarily more difficult objective. Balancing this with the increasing pressures and demands upon specialist healthcare facilities in the future does not make sense for the Green Wedge to apply to the site.

Pendine Park is an isolated site that cannot develop further than its own boundaries, and inter-alia cannot develop to link any main conurbations. It is already an identifiably isolated and specialist care provision in the countryside, a location which benefits many of its patients on the road to recovery.

The Green Wedge allocation should not include Pendine Park, and control of sensitively designed development can easily be achieved through the regular planning control process without the need for business threatening policy restrictions. See Section 8 of this report for further detail.

Pendine Park has received 'in-principle' support from the Betsy Cadwaladr University Health Board and Wrexham Council Social Services to extend care support services to both bodies, and Pendine Park is recognised by both bodies as a very important provider and partner.

6. The Need, Demand and supply

The emerging LDP Infrastructure Plan (EB101 – Wrexham LDP 2013-2028 Infrastructure Plan 2017) identifies a number of key issues in sections 4.13 – 4.48 that relate to health care in the county.

These include:

- Rapidly growing population placing increasing pressure on the health care system – the 2017 Census confirms a 119% increase in population in ages 80+
- Largest growth is in the aged/retirement range, again imposing increasing pressure on care and mental health care. Pendine Park experience 40-50% of its bed population to be undertaken by the aged.
- The population growth will bring specific challenges to the primary (hospitals) and community (local – eg Pendine Park) care facilities
- The Local plan strategy needs to ensure that the projected population growth can be accommodated in health terms (para 4.14)
- Accepts the challenges the NHS face in delivery of services – and inter-alia the services offered by Pendine Park will assist in sharing some of the increasing load, especially in mental, trauma and specialist care; a function Pendine Park already operates in conjunction with the health authority.
- Whilst capital investment for the primary care services will be increasingly pressurised, Pendine Park benefits from the ability to source alternative funding streams to deliver critical care services.
- The "Living Healthier, Staying Well" campaign encouraged by the emerging LDP places great importance on community care for local people, and the benefits of treating patients close to home, a facility and principle Pendine Park fully supports.
- It recognises that most GP services in the County Borough are working at or very near to maximum capacity, and pressures on the system will only increase with the population and age growth, therefore ensuring Pendine Park can continue to develop and grow as a specialist care provider will be vitally important to assisting the overall County Borough manage and deliver care for the remainder of the LDP period and beyond. Securing appropriate planning allocation will safeguard this future development for the wholesale benefit of the wider community.
- The primary health Board will develop more modern and purpose built facilities and work with 3rd sector partners such as Pendine Park, and as such, the development of similar facilities at Pendine Park will also be required to keep ahead of demand.

- The “Cluster Model” is already operational at Pendine Park, and safeguarding future development at the site will maintain and encourage further concentration of specialist provision at the site.
- Para 4.29 identifies there is little scope for physical capacity expansion to support growth in many GP premises, and allocation for spatial growth within the LDP is specifically encouraged. Pendine Park has more than sufficient space to sensitively develop further accommodation at the site within the controls of planning requirements relating to its location, and therefore it makes absolute sense to ensure development can take place at Pendine Park by providing a specific site allocation and not have it washed-over by the currently proposed Green Wedge.
- Para 4.31 specifically identifies working with community partner organisations to improve service delivery.

7. LDP shortfalls and insufficient provision

Within the emerging LDP and associated supporting documents and reports there is regular mention of the shortfalls in services and facilities in the County Borough, and specific mention of the problems the Health Care & wellbeing sectors will face in future years as a result of rapidly increasing and ageing population in the County, and increased pressures on the care providing infrastructure due to lack of space, lack of appropriate sites, reduced funding and increasing demand.

The Emerging LDP makes encouraging statements regarding the improvement of health and wellbeing of its residents, and goals are being set to reduce illness, mental illness, obesity and other lifestyle ailments.

The Infrastructure strategy document regularly and clearly states that there is increasingly insufficient provision in the County to cope with demand. This will increase with the increase in aged population.

Pendine Park has the skill, reputation, facilities and highly trained staff to deliver much needed care services to the County community and wider North Wales & North West areas.

Pendine Park is exactly the type of independent Partner organisation that the “Prosperity for All” Economic Action Plan seeks to support and encourage. It has ample space to develop on an existing site with established care infrastructure and will not threaten the integrity of the open countryside around it in relation to green wedge protection between Wrexham and Gwersyllt.

As demand increases, there will be a reciprocal need to provide additional services, space, buildings, facilities and care. Pendine Park has this space readily available, and a proven award winning business track record of delivery of the highest order.

The emerging LDP regularly states one of its prime objectives is to support and encourage businesses to grow, to create more employment, to provide greater educational opportunity and to deliver centres of excellence for the County moving forwards to the end of the 2028 LDP period and beyond.

“Prosperity for All” Economic Action Plan has not been included in the LDP’s considerations, and therefore the draft LDP falls short of adequately encompassing all relevant and current Welsh Government Policy requirements. Care and well-being are a foundation sector to be supported and encouraged, and the LDP should therefore be amended to include, and allocate Pendine Park as a very special case surrounded by Green Wedge, and be appropriately allocated for future growth.

In order to do this, Pendine Park requires one main support from the County Borough Council, that is to allocate an appropriate use designation for the Pendine Park site, and remove the washed-over Green Wedge allocation currently proposed in the emerging LDP.

The application of a Green Wedge allocation over the whole of Pendine Park makes no sense at all in relation to the other aspirations of the emerging LDP, which is to support and encourage business and services through the medium of planning provision.

Pendine park works closely with the main local health board, and its activity at Pendine Park should be safeguarded and allocated appropriately. Generating an environment through planning policy within which Pendine Park can be managed and nurtured to the benefit of the overall community can only be a positive thing for the County, and the open countryside and Green Wedge principles between Wrexham and Gwersyllt can still be fully protected via regular planning control means.

The current draft of the LDP is not sound and does not take full account of current published Welsh Government Policy requirement and guidance because it has not included for the inclusion of the "Prosperity for All" Economic Action Plan and therefore would be failing to address a key Economic Plan by the Cabinet Secretary for Economy & Transport (Wales) and inter alia the First Minister's National Policy "Prosperity for All" and allocation of Pendine Park should be altered to appropriate ongoing service delivery, employment and education.

The draft emerging LDP does not pass Test 1 because:

- It does not have regard to National Policy ("Prosperity for All" Economic Action Plan)
- It does not have full due regard to well-being goals as a consequence of the above and also the fact that the Green Wedge policy applied to Pendine Park is harmful to the business and harmful towards future ability to provide specialist independent care services to BCUHB and Wrexham Social Services and the local Community of Wrexham. Mis-applied planning policy in the form of Green Wedge at Pendine Park will reduce the ability of Pendine Park to plan ahead for the aged population growth of 119% anticipated over the next 18 years during the lifetime of the LDP

The draft emerging LDP does not pass Test 2 because:

- It is not locally specific in relation to existing facilities at Pendine Park, which is the largest supplier of independent specialist care to the BCUHB and Wrexham CBC Social Services, both of whom have already indicated a need for increased service provision between the relevant bodies and Pendine Park
- It does not address key issues in relation to Care provision – the LDP is extremely weak and vague in relation to specialist care provision, only indicating it as "more needed" whilst recognising there will be significant increases in demand for aged care on the Wrexham community over the coming years.
- It does not meet assessed needs in the specialist care sector, such as dementia care, stroke recovery, head trauma recovery and let-down integration back into society.
- It does not have sufficient vision and strategy to correctly address care provisions in the County, in fact, the LDP is largely silent indeed in this respect. The "Prosperity for All" Economic Action Plan identifies Social Care, Mental Health and Skills & Employability as priority sectors for cross governmental working, yet the LDP does not include any reference whatsoever to "Prosperity for All" principles in this regard, and with Wrexham being an important regional hub for health and care services provision, there should be a far stronger

dedicated policy section addressing all the care provider institutions within the LDP for the Borough

- “real alternatives” have not been addressed in relation to Pendine Park, in fact, no alternative has been addressed, it has simply been over-washed as part of the Green Wedge Policy, therefore is contrary to the aspirations of “Prosperity for All” Economic Action Plan and other policy aims within the LDP to support and encourage business growth and employment and care provision.

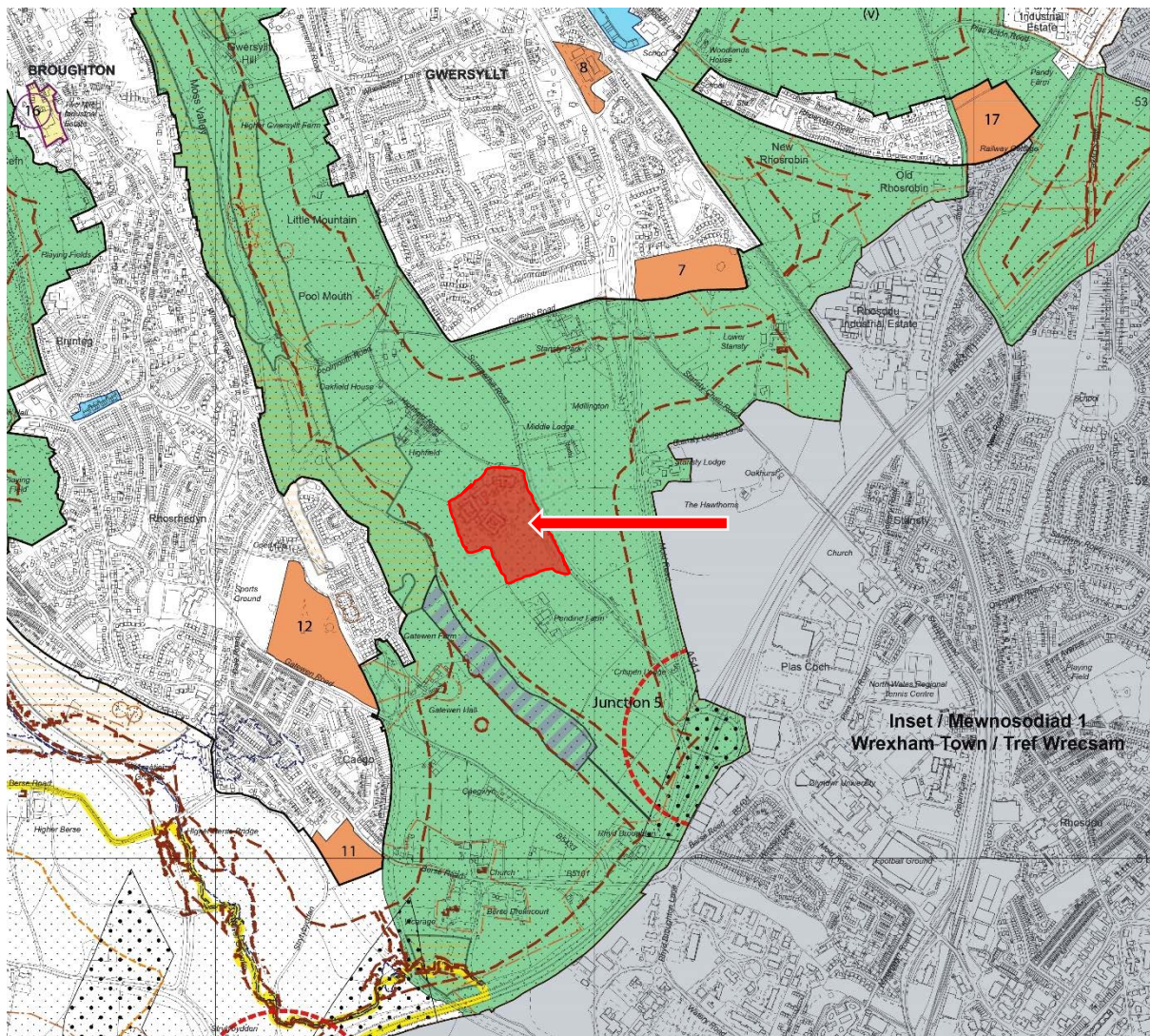
The draft emerging LDP does not pass Test 3 because:

- It will not be effective in relation to independent care provision by the largest supplier (Pendine Park) to the Authorities in this area
- If the Green Wedge allocation at Pendine Park is not changed, the viability of future independent specialist care at the site will be placed in doubt as a result of unnecessarily restrictive planning policy associated with Green Wedge.
- There would be no economically feasible alternatives to Pendine Park in the Authority area, establishing a new comprehensive 1st generation Care facility on a new site would not be achievable under current funding arrangements.

8. Green Wedge and countryside character protection

The emerging LDP and previous policies have included the measure of Green Wedge (or as previously known, Green Barrier) protection to safeguard against uncontrolled sprawl and merging of neighbouring settlements. It also made reference to the provision of easily accessible open space for the residents of the County Borough.

A Green wedge exists between Gwersyllt, Broughton/Rhosrhedyn and Wrexham, and well defines the separation between these settlement areas. Pendine Park is located almost centrally between these 3 settlements (see map extract below – Pendine Park site arrowed & shaded red)



The Wrexham Strategic Green Wedge Review (Oct 2017) states the purpose within the emerging LDP of a Green Wedge is to:

- prevent the coalescence of large towns and cities with other settlements;
- manage urban form through controlled expansion of urban areas;
- assist in safeguarding the countryside from encroachment;
- protect the setting of an urban area; and

- assist in urban regeneration by encouraging the recycling of derelict and other urban land.

prevent the coalescence of large towns and cities with other settlements

The position and size of Pendine Park is such that even if it were fully developed then it would still not create any precedence nor pressure towards coalescence of the surrounding settlements because there are very wide areas of totally open landscape surrounding Pendine Park on all sides. It is a wholly independent and isolated site, but is already a well-developed and known built form in the landscape.

manage urban form through controlled expansion of urban areas

Pendine Park is not within an urban area, not attached to an urban area, nor is it close to an urban area. It sits isolated in its countryside setting, but presents a 'very special and established existing case' development in its own right.

Through appropriate regular planning controls, the existing care facility development could be sensitively expanded to fit within its setting in a most acceptable manner, and still maintain the openness of the countryside without changing its character.

assist in safeguarding the countryside from encroachment

Pendine Park is already a well-established and familiar large care development within the countryside setting between Gwersyllt and Wrexham. The grounds of Pendine Park are private land that is used by the care facilities in part as a tool in their wellness and recovery treatments, with much of the land already facilitating parking, paths, ancillary buildings and spaces.

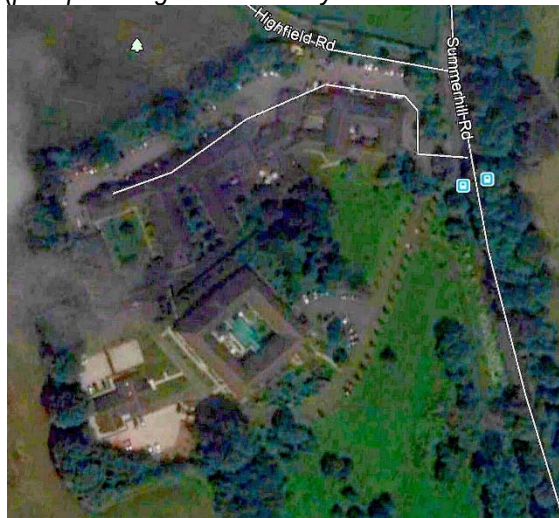
It is wholly appropriate to view the grounds around Pendine Park as part of the operational business and not as open countryside.

In total the nursing home provides living accommodation for nearly 250 residents, who are provided with a significant level of nursing, medication and treatment services on site. This is a significant and exceptional business and site within the surrounding green wedge, yet it is encapsulated by its own boundaries and cannot create any precedence of further development into the open countryside, therefore the site itself cannot influence encroachment between the major settlements of Wrexham and Gwersyllt or Broughton/Rhosrhedyn.

The grounds are screened from external view by tall stone walls along Summerfield Road, with only fleeting glimpses possible as one passes the existing entrances. Other boundaries are also screened with tall hedgerows and banks of mature trees, and the ability to view into the site is very limited.



Early birds-eye view of Pendine Park showing the walled boundary to Summerhill Road and dense boundaries (pre quadrangle and laundry block construction – see below)



The array of care buildings have developed in a regularised manner appropriate to the large country house environs that previously existed.

There are interesting and relevant points made by Planning Inspector Alwyn B Nixon MRTPI in his consideration of Appeal case No APP/H6955/A/1/2155138 dated 19th January 2012 regarding the site, which are also relevant to supporting the ongoing development of Pendine Park as a Care Centre of excellence whilst protecting the openness of the countryside in accordance with the aspirations of the emerging LDP to support and encourage business, economic and educational growth, and to facilitate the development of more key care infrastructure sites to satisfy the increasing demand generated by a rapidly growing and ageing population in the County Borough.

The LDP and supporting documents recognise that Wrexham County Borough has the greatest increase in population in North Wales, and will likely continue to do so at an increasing rate, and as a result the emerging LDP is required to facilitate a planning environment that assists and supports appropriate development to accommodate the increases in demand.

Pendine Park has that capacity, and appropriate designation and removal of the washed-over Green Wedge will support future improvement and development at the site.

The Inspector stated:

“Whilst the building would self-evidently result in a reduction in the openness of the green barrier, I consider that the harm caused would be slight, owing to the new building’s assimilation with the existing buildings at Pendine Park, the presence of these buildings as a clearly-evident isolated enclave of built form within the Green Barrier and the minimal change to this current situation that would result. The development would not significantly threaten the integrity of the Green Barrier in this location or materially undermine any of the Green Barrier purposes identified in the UDP. I conclude on the first main issue that there would be a minor degree of harm to the Green Barrier in terms of its openness, but no appreciable harm to its character and appearance or to the robustness and integrity of the Green Barrier.

I have also considered whether the proposal would cause material harm in other respects. Whilst there are protected trees in the vicinity, subject to a condition to ensure that they are not harmed by construction activities these would not be adversely affected by the proposal. The proposal does not have any adverse habitat conservation implications. No other harmful effects have been identified.

This report is not concerned with the individual building referred in the Appeal, but what is important is the evaluation of the purpose of the Green Wedge by the Inspector, and his agreement that Pendine Park presents Very Special Circumstances which on overall planning balance mitigate sensitive development against the slight harm that such development presents in relation to the overall Landscape character.

His conclusion read:

“Balancing the considerations in this case I find that, notwithstanding the clear general presumption against inappropriate development within the Green Barrier and the substantial weight required to be given to any harmful impact on the same, considerations exist which clearly outweigh the minor degree of harm that would be done to the Green Barrier. These considerations similarly indicate a determination otherwise than in accordance with UDP policy EC1. Taking all matters into account, I conclude that the very exceptional circumstances required to justify the inappropriate development proposed are present in this case. Consequently I allow the appeal.”

The application of Green Wedge policy over the site of Pendine Park is, in our professional opinion, an unnecessary policy burden on an important service and facility, and that regular planning policy controls can easily and adequately control sensitive development successfully in lieu of a washed-over Green Wedge classification, and we would submit that the Green Wedge classification is removed to the boundary of the site at Pendine Park.

protect the setting of an urban area

Pendine Park is not an urban setting, therefore this Green Wedge element is not relevant.

assist in urban regeneration by encouraging the recycling of derelict and other urban land

Although Pendine Park is not in an urban setting, it is effectively previously developed land and therefore a brownfield site. We discuss the balance of Brownfield v Greenfield in section 13 of this report.

9. Boosting Employment opportunity

Pendine Park has over 250 residents / patients which are mainly high dependency or high needs care, and this number is set to increase with the growth of the local population and the increasing demands placed upon the health care services.

Pendine Park directly employs 509 staff to service the care centres, and this number will increase to keep pace with the increase in demand, patient numbers, and keeping at the forefront of specialist care will also result in an overall increase in staff of all skills and qualifications.

Care service staff are a reasonably mobile workforce, and to maintain jobs at Pendine Park, the right conditions and training needs to be offered. It is essential therefore that the Planning environment and policy provisions in the emerging LDP must reflect a positive and supportive allocation for Pendine Park in order to maintain and safeguard the business, employment and future job opportunities.

The Employment Land Review final report (Oct 2015) does not mention Care services or medical employment specifically, and the Welsh Government does not list it as one of the 9 key economic sectors, but it is true that the health & care services in and around Wrexham, both private and primary care providers, are a large and very important employment provider locally, and Wrexham as an area has a higher than average concentration of medical and care facilities in the Borough, including Wrexham Maelor General Hospital, with which Pendine Park work in close conjunction.

Wrexham Maelor general hospital has in excess of 600 beds and is the largest hospital in North Wales, and therefore Pendine Park with its 250+ patients is without question a large facility and provider of special care needs.

The allocation of special consideration measures for the Pendine Park site will safeguard present jobs and give the opportunity to create more employment through careful and sensitive development. The Green Wedge policy is not suited to this existing service facility and centre of excellence, and inappropriate planning policy will likely jeopardise Pendine Park's ability to be the award winning service leader that it currently is.

Protection and encouragement of employment is a policy aim in the emerging LDP, and Pendine Park should be considered a special case in the light of the planning policy that is currently proposed in the emerging LDP.

We also refer again to the "Prosperity for All" Economic Action Plan that actively supports Care services and economic improvement. National Policy "Prosperity for All" also states:

Planning decisions affect every area of a person's life. They determine where homes are built, where services are provided, and the quality of the local environment; and they promote sustainable economic growth and access to open space. The right planning system is critical to delivering our objectives in this strategy.

In this regard it is quite clear, the correct and appropriate planning policy allocation should be attributed to Pendine Park to protect its current care service provision and support future development of the business, care provisions, employment opportunities and educational delivery at the site. To do so would be wholly in compliance with National Welsh Government Policy.

10. Accessibility to services

As discussed in the previous section relating to employment, policy support for the activities at Pendine Park across the site will not only benefit the protection and encouragement of employment for local people, but will also boost the specialist services offered at Pendine Park and generate an environment within which the specialist care services can be further developed, improved and expanded to the benefit of the local economy, care demands and population increases, all of which are recognised within the emerging LDP and associated supporting documents.

The location of Pendine Park in an accessible location very close to Wrexham and other major conurbations means that it is easily reached by the patients, and the families of those patients needing the type of high dependency care offered at Pendine Park.

The emerging LDP documentation recognises that local services for local people is a significant benefit to patient well-being, recovery and is also a very sustainable way of minimising resource wastage (for example travelling)

Pendine Park also provides an invaluable second tier support service to the Primary Health providers in Wrexham County Borough and the wider North Wales & North West. Pendine Park by direct association assist in relieving pressures on the NHS and local Health Board by adding to the overall capacity of the healthcare system in North Wales, and their specialist trauma care and dementia care facilities are of significant benefit to the primary health care providers in releasing NHS resources to address other needs.

For Pendine Park to continue to lead the way in critical and dementia care on site, a supportive planning policy environment should be applied to the site to safeguard future accessibility to services and employment.

The emerging LDP preferred strategy document “Initial sustainability Appraisal Report” places great importance on the need to “Improve access to healthcare facilities” Clause SP4.

It also encourages the promotion of Health & Wellbeing in Clause SP6, where it aspires to “create & safeguard opportunities for safe, healthy fulfilling & active lifestyles by working partnership with Social Care Providers” Recognising Pendine Park as a very special case sitting within the surrounding Green Wedge would be wholly within the intention of this part of the emerging LDP, to protect and encourage improvement of health and wellbeing for patients at the site by supporting future development without the over-arching restriction brought by the green Wedge policy.

Policy proposal SP8 aspires to locate care facilities and services in the most sustainable locations, but there is also recognition in the emerging LDP under the “Background Paper” March 2015 in Section 3.2 that suitable brownfield sites for redevelopment within the main own centres are all but exhausted, which has led the Council to look towards greenfield sites rather than brownfield sites, stating that increasing use of Greenfield sites is “inevitable”.

Pendine Park is an existing infrastructure provision on a brownfield site that has capacity to be further developed sensitively, and can be readily safeguarded using regular planning controls.

Pendine Park is 1Km from shops and services on Plas Coch Road such as Sainsburys, Boots, Aldi, Glyndwr University, Petrol Stations etc, and has a direct footpath from the entrance of Pendine Park to

these facilities. It is some 750m from the main A483 Wrexham By-pass and 1.75Km to Wrexham General Railway Station.

There is a regular all-week bus service from the entrance of Pendine Park directly into Wrexham that takes on average 16 minutes, and calls at the Wrexham Maelor General Hospital en-route. The site is easily accessible. There is ample parking on site with plenty of room for future development and expansion.

21 WREXHAM/WRECSAM - SUMMERHILL/BRYNHIFYRD via Plas Coch

21A WREXHAM/WRECSAM - SUMMERHILL/BRYNHIFYRD via Maelor Hospital/Ysbyty Maelor

Monday to Saturday except Bank Holidays : Llun i Sadwrn heblaw Gwyliau Cyhoeddus

ARRIVA BUSES WALES

Service No. / Rhif Gwasanaeth:	21	21A	21	21A	21	21A	21	21A	21	21A	21	21A	21	21A	21	21A	21	21A	21
Wrexham, Bus Station [4]	0841	0711	0741	0811	0841	0911	0941	1011	1041	1111	1141	1211	1241	1311	1341	1411	1441	1511	1541
Maelor Hospital		0714		0814		0914		1014		1114		1214		1314		1414		1514	
Plas Coch Retail Park	0647		0747		0847		0947		1047		1147		1247		1347		1447		1547
Pendine Estate	0653	0723	0753	0823	0853	0923	0953	1023	1053	1123	1153	1223	1253	1323	1353	1423	1453	1523	1553
Summerhill, New Rd	0659	0729	0759	0829	0859	0929	0959	1029	1059	1129	1159	1229	1259	1329	1359	1429	1459	1529	1559

Service No. / Rhif Gwasanaeth:	21A	21	21A	21	21	21	21	21	21
Wrexham, Bus Station [4]	1611	1641	1711	1741	1815	1915	2015	2115	2215
Maelor Hospital	1614		1714						
Plas Coch Retail Park		1647		1747	1820	1920	2020	2120	2220
Pendine Estate	1623	1653	1723	1753	1825	1925	2025	2125	2225
Summerhill, New Rd	1629	1659	1729	1759	1830	1930	2030	2130	2230

21 SUMMERHILL/BRYNHIFYRD - WREXHAM/WRECSAM via Plas Coch

21A SUMMERHILL/BRYNHIFYRD - WREXHAM/WRECSAM via Maelor Hospital/Ysbyty Maelor

Monday to Saturday except Bank Holidays : Llun i Sadwrn heblaw Gwyliau Cyhoeddus

ARRIVA BUSES WALES

Service No. / Rhif Gwasanaeth:	21	21A	21	21A	21	21A	21	21A	21	21A	21	21A	21	21A	21	21A	21	21A	21
Summerhill, New Rd	0659	0729	0759	0829	0859	0929	0959	1029	1059	1129	1159	1229	1259	1329	1359	1429	1459	1529	1559
Pendine Estate	0707	0737	0807	0837	0907	0937	1007	1037	1107	1137	1207	1237	1307	1337	1407	1437	1507	1537	1607
Plas Coch Retail Park	0714		0814		0914		1014		1114		1214		1314		1414		1514		1614
Maelor Hospital		0745		0845		0945		1045		1145		1245		1345		1445		1545	
Wrexham, Bus Station	0719	0749	0819	0849	0919	0949	1019	1049	1119	1149	1219	1249	1319	1349	1419	1449	1519	1549	1619

Service No. / Rhif Gwasanaeth:	21A	21	21A	21	21	21	21	21	21
Summerhill, New Rd	1629	1659	1729	1759	1830	1930	2030	2130	2230
Pendine Estate	1637	1707	1737	1807	1837	1937	2037	2137	2237
Plas Coch Retail Park		1714		1814	1842	1942	2042	2142	2242
Maelor Hospital	1645		1745						
Wrexham, Bus Station	1649	1719	1749	1819	1847	1947	2047	2147	2247

O ddydd Sul 25 Mehefin, 2017
From Sunday 25 June 2017

21 WREXHAM/WRECSAM - SUMMERHILL/BRYNHIFYRD via Plas Coch

21A WREXHAM/WRECSAM - SUMMERHILL/BRYNHIFYRD via Maelor Hospital/Ysbyty Maelor

Sunday & Bank Holidays Only - Suliaw a Gwyliau Cyhoeddus

ARRIVA BUSES WALES

Service No. / Rhif Gwasanaeth:	21A	21	21A	21	21A	21	21A	21	21A
Wrexham, Bus Station [4]	1035	1135	1235	1335	1435	1535	1635	1735	1835
Maelor Hospital	1039		1239		1439		1639		1839
Plas Coch, Sainsburys		1141		1341		1541		1741	
Pendine Estate	1045	1147	1245	1347	1445	1547	1645	1747	1845
Summerhill, New Rd	1051	1153	1251	1353	1451	1553	1651	1753	1851

21A SUMMERHILL/BRYNHIFYRD - WREXHAM/WRECSAM via Maelor Hospital/Ysbyty Maelor

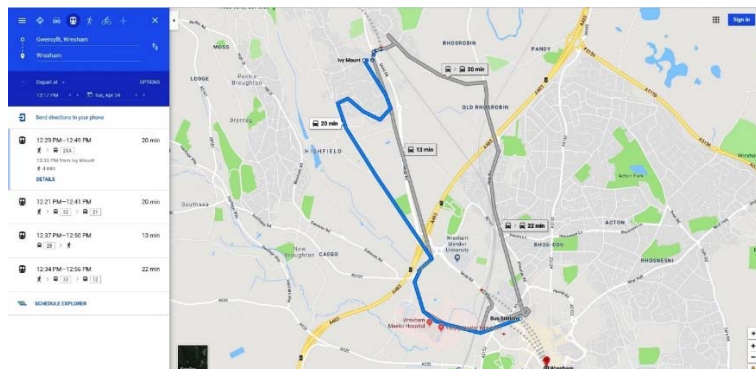
21 SUMMERHILL/BRYNHIFYRD - WREXHAM/WRECSAM via Plas Coch

Sunday & Bank Holidays Only - Suliaw a Gwyliau Cyhoeddus

ARRIVA BUSES WALES

Service No. / Rhif Gwasanaeth:	21A	21	21A	21	21A	21	21A	21	21A
Summerhill, New Rd	1051	1153	1251	1353	1451	1553	1651	1753	1851
Pendine Estate	1059	1201	1259	1401	1459	1601	1659	1801	1859
Plas Coch, Sainsburys		1208		1408		1608		1808	
Maelor Hospital	1105		1305		1505		1705		1905
Wrexham, Bus Station	1109	1213	1309	1413	1509	1613	1709	1813	1909

O ddydd Sul 25 Mehefin, 2017
From Sunday 25 June 2017



Bus route from the entrance of Pendine Park to the City Centre of Wrexham –16 minute journey.

SP7 advocates the Local Plan should make provision for specific housing needs such as nursing, residential & extra Care homes where a need is identified. A need is clearly identified in the “Background Paper” dated March 2015, which states in Table A1.1 in the case of care facilities that “More needed” in the Care Sector, and increased support required for all ages 75-85+

11. Adapting to increased population and age increase

The LDP and supporting reports recognise unanimously that the population of Wrexham County Borough is the fastest growing in North Wales, and the largest age-group that is growing is the elderly.

The “Population and household projections with dwelling and employment impacts Background Paper No1” dated March 2015 states:

3.2 – Population totals in Wrexham have grown by about 6% in the last 10 Years. Growth was seen in all broad age groups, but the biggest increase was in those aged 65+

3.4 - The population of Wrexham would grow naturally without any in-migration There are more births than deaths every year in the County Borough (average about +420 per year over the past five years).

3.32 The proposed objectives for the LDP set out what the plan is trying to achieve. Those directly relevant to the economic aspirations for the County Borough include:

- o Objective 1: Meet the future needs of a growing population by providing the right type, mix, quality and amount of development and infrastructure in sustainable and accessible locations, ensuring that the role of Wrexham as a key settlement of national importance in the Wales Spatial Plan Wrexham-Deeside-Chester hub is strengthened, and;*
- o Objective 3: Ensuring a supply of jobs to support an increased workforce in the County Borough and surrounding area by providing economic development opportunities to allow existing businesses to expand and grow, and to ensure that the County Borough continues to provide the right type of employment land, in the right location to enable new businesses to locate in Wrexham and take advantage of its strategically accessible location within the wider North East Wales and North West England market region.*

This, one would argue relates equally to the supply of care facilities that treat dementia, head injuries, strokes and care homes for the elderly, including the opportunity & support for existing businesses to develop and grow on the right land in the right location, all attributes that relate fully to Pendine Park.

An ageing population also limits the amount of travel it undertakes, and having Pendine Park in such close proximity to major conurbations is advantageous to the elderly and infirm that require its services or their relatives. Pendine Park would be part of the solution to the demand in the Borough.

Table A1.1: possible impacts of projected population, household and employment change on service delivery

Sources: 2011-based population & household projections, Welsh Government; employment-led projections, Corporate Research and Information Unit, Conwy CBC

Impact indicator	Totals 2013 (mid-year estimate)	Potential change/impact 2013-2028		
		Employment- led projection	2011-based projection - 5 yr mig	2011-based projection - 10 yr mig
Projection				
Population	136,400	22,350	17,900	15,900
Households	58,050	11,400	9,700	8,850
Housing				
Total dwelling requirement*	-	11,850	10,050	9,200
Annual dwelling requirement*	-	790	670	610
Affordable housing provision potential	-	Medium	Low	Low
Business and employment				
Working age population**	82,000	17,350	14,250	12,600
Labour force (working age pop. who are economically active)	64,700	12,550	10,150	8,850
Jobs growth	61,000	8,700	6,900	6,050
Income in local economy	-	Big increase	Increase	Increase
Business impact	-	Positive	Positive	Positive
Employment land requirement (new)	-	60.9 ha	48.4 ha	42.3 ha
Transport				
Traffic level increase (relative)	-	High	High	High
Pensioners' bus passes	-	Much higher	Much higher	Much higher
School bus cost	-	Higher	Higher	Higher
Education				
Pre-school age (0-4)	8,900	-50	-500	-700
Primary school age (5-10)	9,750	1,250	800	750
Secondary school / FE places (11-17)	10,750	2,400	2,100	2,200
Social services				
Aged 85+ (potential increased support)	7,750	2,500	2,450	2,400
Aged 75-84 (potential increased support)	3,100	4,600	4,500	4,450
Change in "care" sector employment	-	More needed	More needed	More needed
Potential impact on children's services	-	More needed	More needed	More needed
Refuse collection				
Amount of domestic refuse	-	16%	13%	12%
Number of domestic collection points	-	20%	17%	15%
Council tax				
Change in tax base	-	Increase	Increase	Increase
Number of one adult household allowances	17,350	5,000	4,550	4,300

12. Supporting existing businesses to expand

A fundamental aim of the emerging LDP is to support growth, encourage opportunity for business development and improve individual health, wealth and services.

Applying a very special measures allocation to Pendine Park will safeguard the future development of the business and provide the framework for more employment and better quality care and skillsets for local people.

Again, one stresses the importance of the "Prosperity for All" Economic Action Plan (May 2018) as a key new Welsh Government policy document to be integrated into the emerging LDP, and key that the Pendine Park site is correctly allocated to support the vital services it offers the Community.

13. Brownfield v Greenfield

There is notable pressure in the County Borough to provide suitable and sustainable sites for development, however the LDP "Settlement Hierarchy and Development Potential background paper No 2" March 2015 states in section 3.2:

"Overall the strategy was successful, with the majority of sites having been developed or having gained planning permission. The strategy has resulted in the majority of brownfield sites in the County Borough having been developed.

Following the preparation of an Urban Capacity Study (2013), and consultation with land owners, the approximate capacity on brownfield sites is 1486 units (Urban Capacity Sites excluding sites with planning permission). It is therefore inevitable that the LDP spatial strategy will differ from the UDP strategy. Whilst it will seek to direct development to brown-field sites, an element of green field allocation is inevitable due to the limited capacity on brownfield sites. "

Pendine Park is a brownfield site sitting within and over-washed by a surrounding Green Wedge policy area, and the site is available for further special case development to assist with the increasing pressures brought by an increasingly elderly population and the funding limitations being levied on primary healthcare providers.

Support at Pendine Park through a dedicated planning policy provision will assist towards the re-use of brownfield sites.



Aerial of site before construction of the laundry block at 'X'

14. Population health & wellbeing

The emerging LDP Topic Paper 5 (Feb 2016) "Health & Wellbeing" sets ambitious targets for the general improvement of the local populations health in Wrexham County Borough, and is a supportive strategy paper to the LDP itself.

Pendine Park offers specialist care for mental illnesses and trauma care, and provides ground breaking and award winning care treatments and facilities, recognised throughout Wales and the UK. Pendine Park is recognised as a leader in the area of specialist care, and works hand-in-glove with the Primary Health Boards to assist deliver healthcare to the local and wider community.

As a previously discussed in this report, Wrexham's population is envisaged to increase at a greater rate than the surrounding areas of North Wales, and the largest population growth age group will be the elderly. This will bring increased demand for the type of Care Pendine Park offers such as dementia and other mental care requirements, and as a result will require Pendine Park to have access to develop its facilities on site within a supportive planning policy environment. The BCUHB and Wrexham Social Services are short of support services in the area, so current discussions with independent support companies such as Pendine Park have indicated the authorities are more than happy to support growth in their sectors to assist alleviating the increasing pressures on the Care sector.

Table 2 – Projected increase in population aged 65 and over

Age	2001	2012 estimate	Population increase	Percentage Increase
65-79	15,166	17,502	2,336	15%
80-84	2,939	3,150	211	7%
85-89	1,669	1,919	250	15%
90+	831	1,092	261	31%

Source: Office of National Statistics – Census 2001

In relation to improving the health and well-being of the local population, Topic Paper 5 states:

"Health and wellbeing can be described as the achievement and maintenance of physical fitness and mental stability, holistically this is related to physical, social, intellectual and emotional factors. Health and wellbeing is a cross cutting and complex issue with the planning system as only one tool to deliver it."

The "Caring for our Health – the Health, Social Care & well-being Strategy for Wrexham 2005-2008" provided an overall vision of:

"To create a healthier community by promoting and supporting healthier lifestyles, and to develop first class services that support those people who have health or care needs"

How the Strategy has taken into account the Social Care Plan

1.5 Local authorities are required by Section 46 of the NHS and Community Care Act 1990 to prepare and publish a plan that sets out the strategic direction for Social Services functions for adults. This document is called "The Social Care Plan". The format of the plan identifies 5 service

specific areas notably: Carers, Learning Disabilities Services, Mental Health Services, Older People Services, and Physical Disability/Sensory Impairment Services. Information from the plan has informed the Needs Assessment. These core service areas are also included in the future planning structure, which will develop and implement the Strategy.

As a consequence, there is an express duty under the Act to support the development and improvement of specialist care facilities in the mental and elderly sectors, a service which Pendine Park offers, and therefore planning policy would appear to be obliged to account for this support in developing the zoning for the site within the wider Green Wedge allocation.

National Wales legislation also makes requirements upon the Borough to facilitate support of improving health and well-being, and whilst its primary focus is relating to public bodies, it has been shown that private care facilities such as Pendine Park are working in close conjunction with those Public Bodies and Primary Health care trusts to deliver a wide-ranging and specialist care service which the public bodies alone cannot deliver.

"The Well-being of Future Generations (Wales) Bill was introduced into the National Assembly for Wales on 7 July 2014. The overall purpose of the Act is to ensure that the governance arrangements of public bodies for improving the well-being of Wales take the needs of future generations into account. The Act details 7 well-being goals which should be achieved through sustainable development."

The existing facilities at Pendine Park offer sustainable future development opportunity on a brownfield site that will benefit the social, care, economic and employment opportunities of Wrexham and the borough. Delivering and maintaining/improving that specialist care service will require the support of the planning policy environment to make recognise Pendine Park as a very special case within the overall Green Wedge setting surrounding the site, as highlighted in Planning Inspector Alwyn B Nixon's commentary at the Appeal Hearing APP/H6955/A/11/2155138 in 2012.

There is also commentary in a number of the emerging LDP supporting documents and papers that access to walking, cycling, open spaces and gardens can have a beneficial effect upon health & well-being. The sustainable and easy access to Pendine Park would sit well with those principles.

For the patients, staff and visitors at Pendine Park, the integration of good and sensitive future development with the existing gardens and planting has the potential to offer quite an unique environment for treatment, recovery and working.

The LDP has also recognised that existing brownfield sites suitable for such developments have all but been exhausted, and therefore Pendine Park makes excellent planning sense to support the facilities towards future development within the constraints of the site itself

15. Pendine Park – benefits, the future and opportunities

Providing an identified planning policy attributed to Pendine Park as a very special case of benefit & advantage to the care provisions of the Borough will support and assist the facility to continue to stay ahead of best care standards, and support the opportunities for business and employment development to the benefit of the community as a whole. The Green Wedge restrictions are not supportive to these aims, and should not be applied to Pendine Park itself.

Sensitive growth can be achieved at Pendine Park through the regular planning control means, and does not need the constraints of Green Wedge policy. The openness, landscape and character of the site could be developed with minimal impact on the wider character, and the unique circumstances at the site mean that coalescence of urban areas cannot take place.

The Ecological value of the site has already been assessed by Kingdom Ecology, and found the overall ecological value of the site to be low and manageable in terms of potential future development

An Arboricultural Impact Assessment and Tree Survey was undertaken in October 2015, and will assist the identification of potential areas for future development in association with the specialised care facilities and operations at Pendine Park

16. The ‘do nothing’ scenario

To leave the site as presently indicated in the emerging LDP as washed-over Green Wedge will severely restrict the ability of Pendine Park to plan ahead with improvements to their care and educational provisions on site.

The Care sector, especially in age care, mental health care and trauma care is extremely competitive, and Pendine Park have proved themselves to be an extraordinary and exceptional care provider over the past 25 years, and it is their goal to remain as a leader in care provision, to the benefit of Wrexham Borough and the local population.

The Emerging LDP clearly states that business support and providing opportunity for business growth is a key policy aim, along with improvements in education, employment and care. All these are provided at Pendine Park, and should be assisted by planning policy to continue to improve and develop over the lifetime of the emerging LDP.

To do nothing generates a risk that the services will remain as-is, will potentially fall behind, and may stagnate in the face of other service providers.

However, from the various LDP supporting documents, one can conclude there are no alternative suitable & sustainable sites to develop specialist care services in the locality (*LDP Background Paper 2, Section 3.2 The strategy has resulted in the majority of brownfield sites in the County Borough having been developed.*) and therefore, with a growing and ageing population that will generate increased demand on exactly the type of services Pendine Park offers, It makes total planning sense to specifically provide Pendine Park its own allocation to support and assist development in the future within the planning system of the over-arching LDP.

The do-nothing scenario is contrary to the “Prosperity for All “ policy requirements.

17. Ease the pressures on the NHS and Social/Health services

Pendine Park works closely with the Primary Healthcare providers in North Wales such as the Betsy Cadwaladr University Health Board and Wrexham Social Services, and therefore take a significant of the pressure and burden off the NHS through the 300 bed capacity at Pendine Park. The requirement for more beds and back-up infrastructure services will grow over the next 18 years as the population grows.

The 119% population growth projected along with an ageing population will increase the pressure on the Primary healthcare providers, and therefore a sound planning strategy to allocate specific development controls at Pendine Park that are not Green Wedge policies will be a very real help to managing the increases in future pressures, and relieve the NHS of some burden in part.

Significant increases in the likes of Dementia Care are envisaged, which are already provided as a specialism service at Pendine Park.

18. Existing Infrastructure and connections

Care for the elderly, mental healthcare and specialist healthcare are all identified in the LDP supporting documents as infrastructure for the area. Pendine Park provides these services and is therefore an existing infrastructure provision within Wrexham Borough.

Accessing existing infrastructure provisions within sustainable locations is encouraged, and development and enhancement of existing infrastructure is encouraged.

Therefore it would conclude that the existing infrastructure at Pendine Park should be identified as such in the allocation maps, and the allocation as a very special case should be incorporated in the emerging LDP to safeguard and support the development and improvement of existing infrastructure provisions as encouraged by the conclusions of the LDP reports.

19. Pendine Park – Very Exceptional Circumstances

In conclusion, it is wholly clear that the Award Winning and market leading Pendine Park care facilities are a very special case indeed. Ministerial Cabinet Minister for the Economy & transport, Ken Skates is clear in his support for the independent Care sector to assist the Authority bodies in the next 18 years.

Pendine Park represents on a number of pan-Wales advisory committees, and are (and have been) influential and respected in the development of care in Wales. It is worth repeating the important level of contribution that Mario Kreft, owner of Pendine Park, has made to healthcare in Wales over the years, and it's indelible positive influence on Wrexham and the local community as a whole:

- Care Forum Wales, responsible for social care policy and working relationship with the Welsh Government and other public, voluntary and private agencies.
- Chair of the Wales Care Awards.

- Sits on the ministerial board overseeing the new Social Services (Wales) Bill - Sustainable Social Services for Wales
- Care sector representative on the advisory National Partnership Forum for Older People.
- Awarded an MBE for his contribution to social care in Wales
- Welsh Government Recognising Achievement Award for his innovative work in health and social care
- Caring Times UK Care Personality of the Year, the first Welshman to receive the award.
- Past vice chair of the National Care Homes Association
- Co-founded Care Forum Wales.
- Past member of the Care Council for Wales
- Past member of the Central Council for Education and Training in Social Work (CCETSW)
- Welsh representative on the board of Social Care Institute for Excellence (SCIE).

20. Conclusion and proposal for the amendment of the draft LDP

Pendine Park is a significant and positive asset to the Wrexham Area and local population. It is offering top quality care and specialised healthcare to the area, employment of over 500 local people, attracts specialist skills to the area, provides educational training, assists the primary health care providers, and can accommodate future expansion at Pendine Park as an existing brownfield infrastructure facility.

A special case planning allocation and recognition within the LDP would be wholly appropriate, and we put forward that the LDP is amended to recognise this special case and contribution. Appropriate planning policy allocation should be attributed to Pendine Park to protect its current care service provision and support future development of the business, care provisions, employment opportunities and educational delivery at the site. To do so would be wholly in compliance with National Welsh Government Policy.

The openness and character of the countryside can be maintained and integrated into future development on site through regular planning controls other than a Green Wedge policy, and sensitive development at Pendine Park cannot and will not jeopardise the core purpose of the Green Wedge policy, as mentioned in Section 8 of this report.

Other reports recently conducted include Ecology, Arboriculture and Transport.

Ecology: A preliminary Ecological Appraisal by Kingdom Ecology concluded:

The study site is considered unlikely to support reptiles, great crested newt or badger. The site is also considered unlikely to support roosting bats but is likely to represent a locally valuable foraging resource for bats. It is considered likely that the site supports nesting birds during the breeding bird season. The site is likely to support farmland and garden bird species that are common in rural parts of Wrexham County Borough.

There were no signs of Badger nor roosting bats. The view regarding reptiles was :

The Summerhill Road and boundary wall to the east would act as a barrier to reptile colonisation from the east, whilst the site is bounded by intensively managed arable fields to the north, south and west which would offer sub-optimal reptile habitats. The COFNOD data

In relation to Great Crested Newts, the report stated:

There are no records of great crested newt using either Pond 1 or Pond 2. The nearest known great crested newt breeding pond is located at Stansty Park which is located approximately 500m to the northeast of the site (Pond 3 on Figure 1). Summerhill Road and the study site's eastern boundary wall along with the boundary wall along the western side of the Stansty Park Estate would prevent terrestrial habitats at the study site from being used by newts associated with Pond 3. It is therefore considered unlikely that great crested newt are present at the study site.

Habitat for nesting & foraging birds exists across the site, and mitigation could involve additional bird and bat roosts in selected locations as part of a controlled development of the site over time. The tree report also identifies species and hedgerows to be kept.

Arboriculture: A tree report to BS:5837-2012 has been undertaken by Tree Solutions Ltd.

The report identified many trees as being of quality category B, C or U, and very few category A trees. The Arboricultural Impact Statement and Tree Protection Plan identified that there are many areas of the site available for future development which will not jeopardise the existing trees, and some proposals for selective thinning and felling of poorer specimens would be beneficial to the remaining trees in having better space to mature.

In the Arborists opinion, the site holds ample potential for future development in conjunction with a successful tree and planting management programme to the overall benefit of the site.

Transport: A draft transport statement has been produced by Highways Planning Services.

The draft transport statement was commissioned to investigate the site's current transportation arrangements (staff, visitors, services) and assess in relation to potential for future development capacity, its impact on the local network, and any areas where the business can improve its transportation footprint, for example car sharing or encouraging the use of public transport, cycling or walking.

Traffic surveys were undertaken on the local road network, and data assessed. Junction capacity far exceeded the actual usage, and available visibility splays are in excess of those stipulated in TAN18.

Road widths were considered to be acceptable, and the future impact upon the Mold Road roundabout were considered to be within normal daily fluctuations and therefore Non-significant. Conclusions were:

- *the proposed development will not generate a significant amount of additional traffic*
- *there will be no significant impact on the operation of the Mold Road interchange roundabout*
- *the capacity of the existing junction onto Summerhill Road is adequate*
- *the layout and available visibility of the existing junction is appropriate*
- *there is no significant traffic accident history in the vicinity of the development site*
- *the developer is fully supportive of sustainable transport and the development will be supported by a Travel Plan.*

It is therefore considered that there is no justifiable highway related reason for refusal of a planning application for residential development on this site.

Since the transport assessment was undertaken, the care home has moved a number of administrative employees from Pendine Park to new premises, therefore releasing staff capacity to be replaced with care staff and new patient facilities on site as part of a planned future development and growth of the business and employment at Pendine Park.

Further dedicated and detailed reports will be submitted with each future planning application.

Key to Pendine Park's current and future success will be the ability for them to plan forward in a structured and positive manner, and that needs the support of the Planning Policy provisions within the emerging LDP.

The Emerging LDP aspires to:

- assist and support business growth,
- improve employment opportunities
- improve educational and employment skill sets
- support the betterment of its residents through work and care opportunities
- increase care facilities for the elderly, mental welfare and general health
- utilise brownfield land instead of greenfield land
- protect and support existing infrastructures
- attract an increase in specialisms to the borough in relation to skills, education, research and centres of excellence
- encourage collaborative working between the public and private sectors

All these elements and opportunities exist at Pendine Park, ready to be developed and improved, and with the correct allocation in the emerging LPD, there is complete sense to recognise Pendine Park site as a special case sitting within the current green wedge overwash.

Pendine Park has always responded to Community needs, has anticipated demand & trends and has provided the correct care provisions in advance of need becoming critical. This is good business planning, but needs the support of planning policy to make it efficient. Future development will be envisaged as low scale and fitting of its countryside character within the existing grounds of this brownfield site.

We respectfully submit that Pendine Park is a very special case, and should be allocated its own policy coverage within the emerging LDP in order to maintain existing services and facilities, and to support

the business to grow and offer better care to the community of Wrexham Borough, along with more job opportunities and security for this award winning facility.

The Green Wedge policy is wholly inappropriate for the future of Pendine Park, and the significantly restrictive policy conditions will be extremely damaging to the future of Pendine Park and its ability to stay ahead of the game in relation to specialist care for the community as the main independent supplier in the area to Wrexham County Borough Council Social services and the Betsy Cadwaladr University Health Board.

This submission is requesting that the Pendine Park Site as a whole is identified as a very special case in planning policy terms, and is afforded appropriate planning policy designation within the site boundaries and for the Green Wedge policy not to be applied to the site. Regular planning control policies will be more than adequate to control and protect the character of the site and wider area, and will allow Pendine Park to continue to provide the specialist care to the local community that will be increasingly in demand over the lifetime of the LDP due to increasing aged population growth as projected.

There is a trend of independently provided care facility bed closures in the area, and should the proposed green wedge planning policy restrictions make it impossible to develop and keep up with demand and legislative requirements within the care sector and create a 'worst case scenario' of the loss of Pendine Park as the largest provider to BCUHB and WCBC Social Services, the impact would be significant along with the loss of over 500 jobs to the local community.

Throughout the emerging LDP and associated reports, there is regular and emphatic policy aspiration to:

- support local businesses, and allow them to plan ahead for growth
- encourage employment,
- improve education and vocational skillsets,
- enhance care in our community,
- increase provision of care to local aged people and those suffering conditions such as dementia,
- utilise existing infrastructure
- prepare in a positive and proactive manner to the projected population and age increases in the borough
- collaborate more closely between independent care providers and the statutory bodies

There is opportunity to do all this at the existing facilities at Pendine Park provided the planning policy support framework is correctly applied and the appropriate allocation is included in the LDP.

We also put forward on reasonable planning grounds that the current draft of the LDP is not sound and does not take full account of current published Welsh Government Policy requirement and guidance because it has not included for the inclusion of the "Prosperity for All" Economic Action Plan and therefore would be failing to address a key Economic Plan by the Cabinet Secretary for Economy & Transport (Wales) and inter alia the First Minister's National Policy "Prosperity for All" and allocation of Pendine Park should be altered to appropriate ongoing service delivery, employment and education.

We respectfully and strongly encourage the Council to amend their LDP to allocate appropriate planning policy to Pendine Park.

21. Appendices:

21.1 Awards

Pendine Park develop best practice and lead the way in many areas. They have many awards and are also very proud of the number of important individual awards their staff have won.

1992 - 1st nursing home in UK to achieve ISO 9002 2008 (Formerly BS5750)

2000 - Investors in People

2012 - Achieved IIP Gold

2010 - UK over 50's Housing Awards - Best New UK Dementia Development

2013 - Globals Over 50's Housing Healthcare - The Most Outstanding Dementia Care Innovation in the World 2013

2013 - UK over 50's Housing Awards - Ann Chapman, Most Outstanding Manager in the UK 2013.

2013 - Gold Standard Framework Award - Highfield Nursing Home

Social Care Accolades

Finalist 2005

Winner - Learning about Caring, Caring about Learning 2009

Winner - Investing in the workforce 2009

Finalist – Developing a sustainable Workforce 2013

Arts Awards

Winner - Arts, Business and Sustainability 2008

Business of the Year - Joint runner up 2008, Finalist 2010

Special Award for music project with Halle Orchestra for music at Pendine Park

Special Award for music project with Halle Orchestra 2009

Excellence in Partnership 2010 (Halle Concert Society and Pendine Park)

Arts & Business – Business of the Year finalist 2013

Arts & Business – In recognition of Outstanding Support of The Arts in Wales 2013

Arts & Business – Business of the Year 2015

Arts & Business - Health award in recognition of the firm's partnerships with the arts to support the mental and emotional wellbeing of its clients and staff 2015

Arts & Business Cymru Awards - Arts, Business and Healthcare - Finalist 2017

Wales Care Awards

Winner - Nurse of the Year 2005 (Chris Jones)

Winner - Promoting Fulfilled Lives 2007 (Sarah Edwards)

Bronze Award - Nurse of the Year 2008 (Zilla Shaw)

Bronze Award - Newcomer of the Year 2009 (Ceri Smith)

Silver Award - Commitment to Training and Workforce Development 2009 (Tracey Evans)

Silver Award - Leadership and Management 2010 (Cindy Clutton)

Silver Award - Excellence in Housekeeping & Hospitality 2010 (Carla Barchetti)

Gold Award - Rebecca Griffiths - Residential Care Practitioner Award 2012

Silver Award - Ann Chapman - Excellence in Mental Health Care Award 2012

Silver Award - Gerry Humphries - Promoting Fulfilled Lives Award 2012

Gold Award - Gerry Humphries - Dignity in Care Award 2012

Silver Award - Beverley Millington - Supported Living Care Practitioner Award 2012

Gold Award - Commitment to Training and Workforce Development Award 2012 (Ann Farr)

Silver Award - Leadership and Management in Residential Care Services Award 2012 (Tracey Smith)
Silver Award - Promoting Fulfilled Lives Award 2012 - (Tracey Green)
Bronze Award - Commitment to Quality in Housekeeping and Hospitality Award - (Ellen Griffith)
Bronze Award - Nurse of the Year 2013 (Terri Broderick)
Bronze Award - Catering in Care 2013 (Christine Tracey)
Bronze Award - Care Practitioner 2013 (Linda Jones)
Gold Award - Newcomer 2013 (Olivia Thomas)
Gold Winner - Promoting Fulfilled Lives 2014 (Matthew Palamarczuk)
Gold Winner - Residential Care Practitioner Award 2014 (Clare Venables)
Gold Winner - Leading Practice in Mental Health and Learning Disability Award 2014 (Judi Roberts)
Silver Winner - Leadership and Management in Residential Care Services Award 2014 (Tracey Cuthill)
Silver Winner - The Social Care Health & Safety Award 2015 (Tracy King)
Gold Winner - Leadership & Management in Supported Living or Small Community 2015 (Audra West)
Bronze Winner - Commitment to Training & Workforce Development 2015 (Joyce Williams)
Silver Award - Residential Care Practitioner Award 2016 (Ruthmar Gaitana)
Bronze Award - Independent Sector Nurse of the Year Award 2017 (Jocelyn De Guzman)
Bronze Award - Commitment To Quality In Housekeeping and Hospitality Award 2017 (Judy Twidale)
Gold Award - Excellence in Catering Award 2017 (Richard Thompson)
Gold Award - Commitment To Training & Workforce Development Award 2017 (Michele May & Sarah Longhurst)
Gold Award - Dignity in Care Award 2017 (Jocelyn De Guzman)
Gold Award - Promoting Fulfilled Lives Award 2017 (Christine Lewis)
Gold Award - The Sir Bryn Terfel Foundation Wales Care Award Promoting The Arts In Social Care 2017 (Nia Davies-Williams)

Design & Business Awards

UK over 50's Housing Awards - Best New UK Dementia Development 2010
Globals, Over 50's Housing Healthcare 2013 - The Most Outstanding Dementia Care Innovation in the World 2013
UK Over 50's Housing Awards – Ann Chapman, Most Outstanding Manager in the UK 2013.
Pinders Healthcare Design Awards 2016 - best new care home in the UK

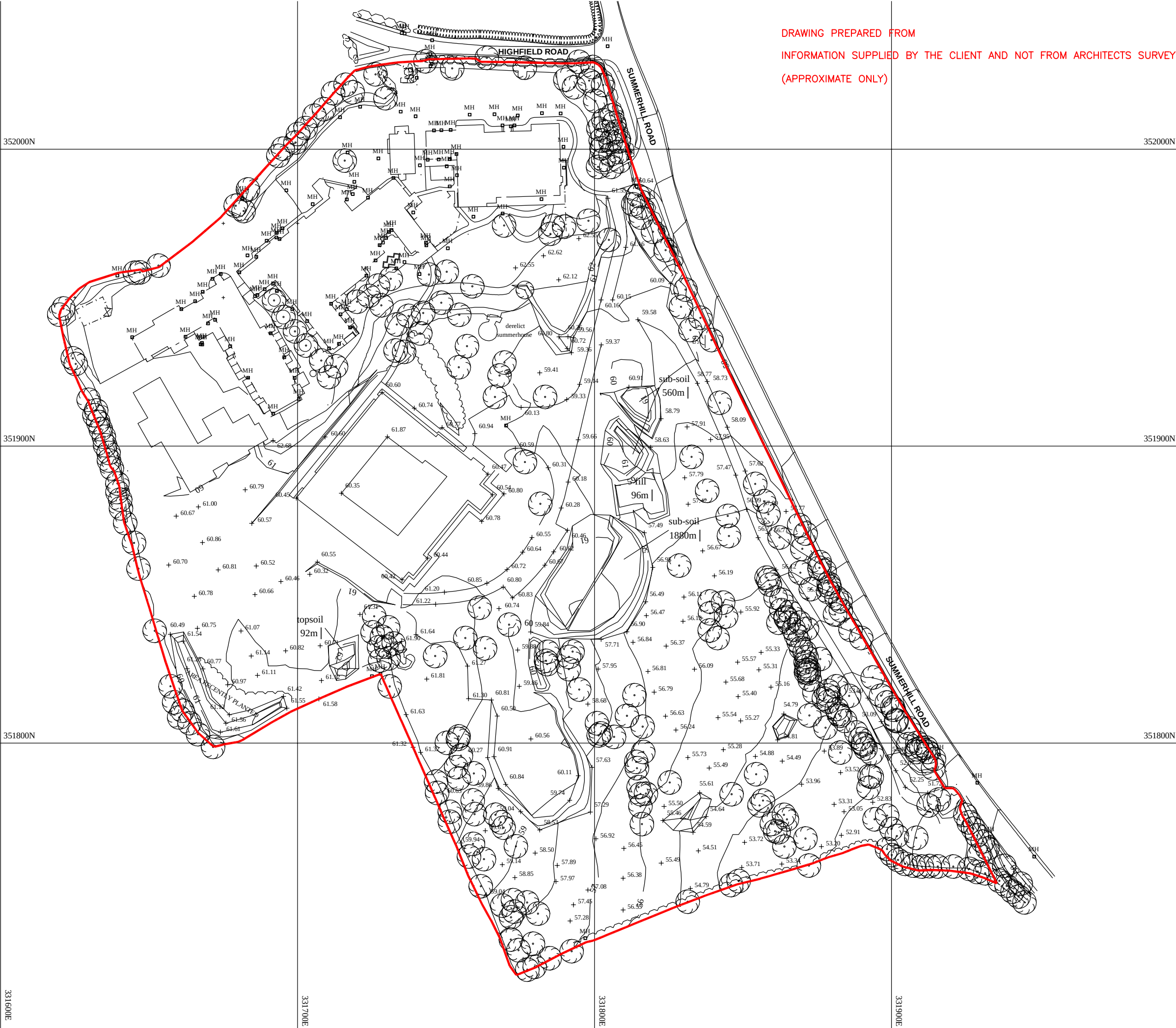
National Training & Educational Awards

Finalist - National Training Award 2006
Winner - National Training Award 2007
Medal of Excellence - City & Guild NVQ4 Management 2007
2001 - Mario Kreft - UK Care Association Volunteer of the Year
2002 - Mario Kreft - Finalist - Caring Times - Care Personality of the Year
2010 - Achievement Wales 2010 - Business Person of the Year (Mario Kreft)
2011 - Mario Kreft - Winner - Welsh Government Recognition Achievement Award for services to social care
2012 - Achievement Wales - Business Person of the Year (Mario Kreft)
2012 - Mario Kreft received MBE for services to Social Care in Wales
2012 - Mario Kreft - Winner - Over 50's Housing Awards 2011
2012 - Mario Kreft - Winner - Caring Times - Care Personality Award
2014 – Mario Kreft - Honorary Fellowship, Glyndwr University for Services to Social Care
2015 – Mario Kreft – St David Award for Enterprise – Welsh Assembly Government

21.2 Pendine Park – existing site plan and Topographical survey

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McCORMICK

ARCHITECTURE
THE MOORINGS, ROWTON BRIDGE ROAD,
CHRISTLETON, CHESTER. CH3 7AE
TEL: 01244 332020
email.info@mccormick-architecture.co.uk
[web:www.mccormick-architecture.co.uk](http://web.www.mccormick-architecture.co.uk)

Client:
**PENDINE PARK CARE
ORGANISATION (SUMMERHILL) LTD**

Project:
DEVELOPMENT AT SUMMERHILL

Detail:
**SURVEY
TOPOGRAPHICAL SITE PLAN**

Status:
FOR INFORMATION

Drawn By:	Date:	Scale:
TOPO	18.11.14	1:1250@ A3

Checked By:	Date:	Signature:
PM	18.11.14	PM

Job No:	Drg No:	Revision:
4135/01	A(050)02	

21.6 Pendine Park – images



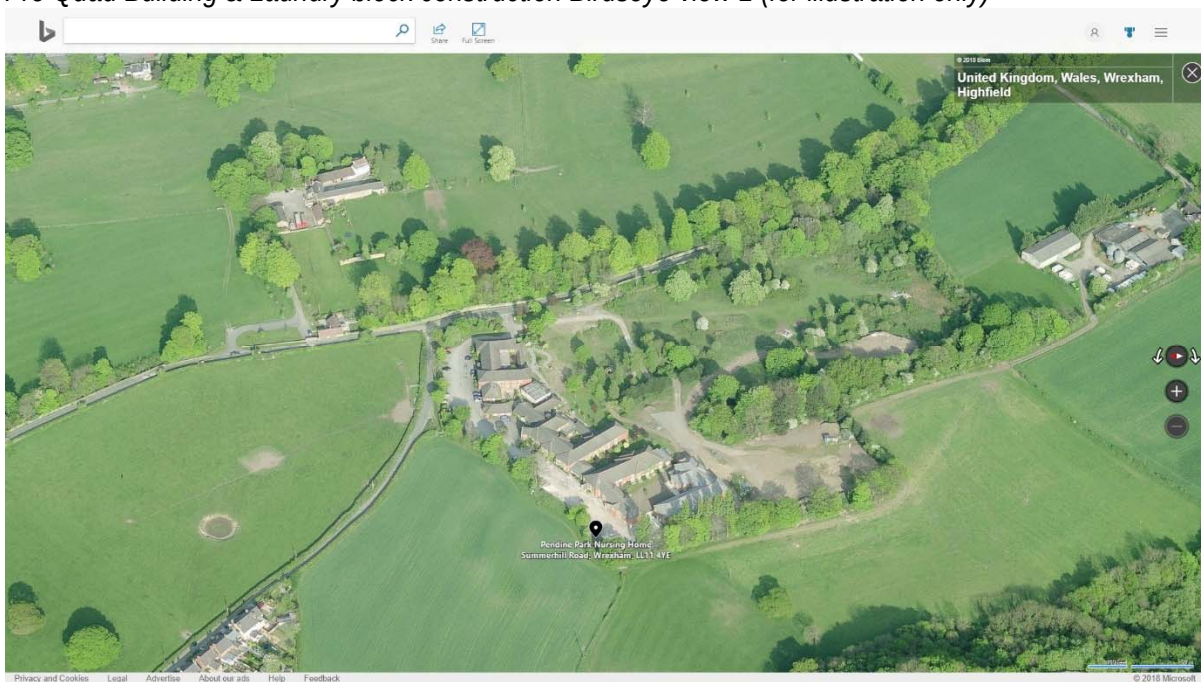
Site aerial (pre-laundry block construction)



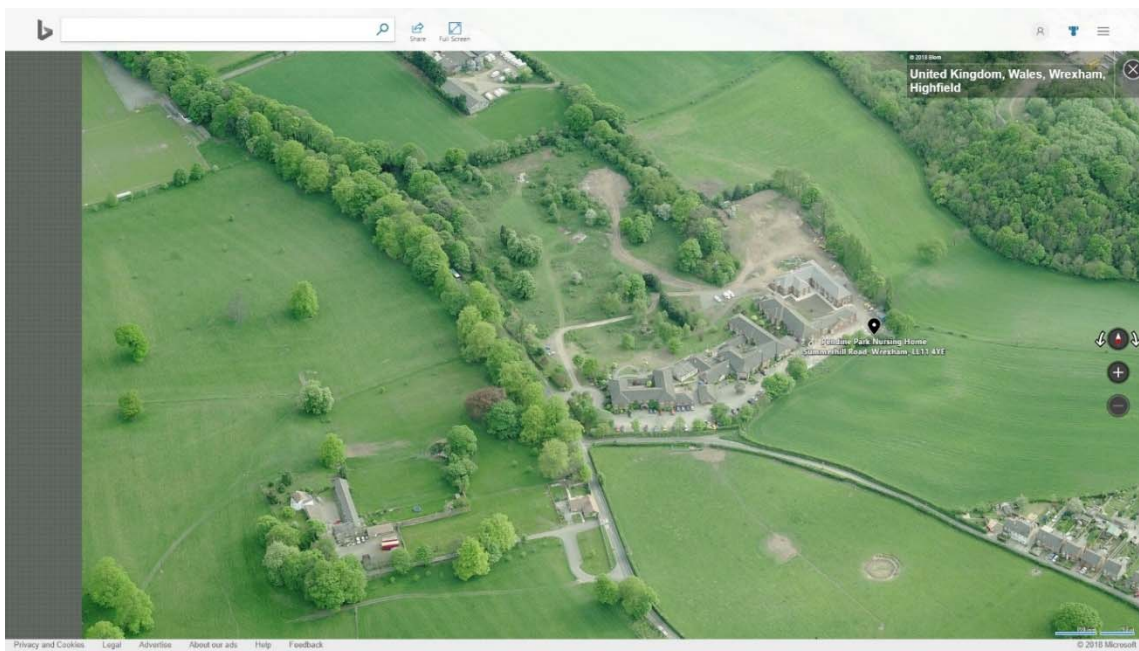
Site Aerial (with laundry block constructed - arrowed)



Pre Quad Building & Laundry block construction Birdseye view 1 (for illustration only)



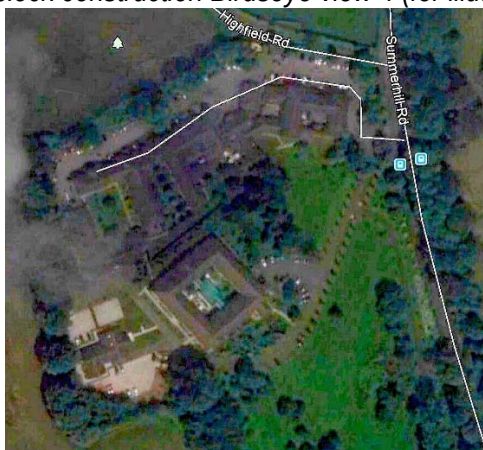
Pre Quad Building & Laundry block construction Birdseye view 2 (for illustration only)



Pre Quad Building & Laundry block construction Birdseye view 3 (for illustration only)



Pre Quad Building & Laundry block construction Birdseye view 4 (for illustration only)



Reference aerial of present development



Streetview 1



Streetview 2



Streetview 3



Streetview 4



Streetview 5



Streetview 6