



PLANNING STATEMENT

Prepared on behalf of Gower Homes Ltd & the owners (Miss C Houston, Miss K Houston, Mr M Houston & Mrs K Davenport)

in support of a

Detailed Planning Application

for the

Proposed residential development for 44 no. residential dwellings (of which 25% (11 no.) will be affordable), public open space, landscaping, means of highway and pedestrian access, local highway and pedestrian infrastructure improvements along Vicarage Lane, foul sewerage pumping station and new off-street resident parking provision for existing residents.

to Wrexham County Borough Council

On land west of Bryn Isa, Vicarage Lane, Gresford, Wrexham, LL12 8UR

December 2018

Ref. J10-GH-PS-RevB

CONTENTS	PAGE
1.0 INTRODUCTION & BACKGROUND	2
The Application Pack	3
Site Description	4
The Proposed Development	7
Pre-Application Discussions	10
Green Barrier Assessment	15
2.0 PLANNING POLICY CONTEXT	21
Local Development Plan	23
Supplementary Planning Policy	39
National Planning Policy	40
TAN 1 Para 6.2 assessment	46
3.0 SUMMARY BENEFITS IN SUPPORT	53
4.0 APPENDICES	60
A : Pre-application Correspondence	
B : Green Barrier PPW policy extract	
C : Green Wedge Review study extract	

1.0 INTRODUCTION & BACKGROUND

- 1.1 This Planning Statement (PS) has been prepared and undertaken by J10 Planning Ltd (the Agent) acting on behalf of Gower Homes Ltd & the owners (Miss C Houston, Miss K Houston, Mr M Houston & Mrs K Davenport) (the joint Applicants). The land associated with this proposal comprises an area of previously undeveloped agricultural land located on land west of Bryn Isa, Vicarage Lane, Gresford, Wrexham, LL12 8UR. The site comprises a single field parcel located on the southerly perimeter of the village that extend to 2.75 ha (6.8 acres) in area.
- 1.2 It accompanies and supports the submission of a Detailed Planning application to Wrexham County Borough Council (WCBC) for the proposed development of the sites for residential use.
- 1.3 The land is presently owned by family members who have entered into a legal agreement with Gower Homes who will purchase the land for development.
- 1.4 Accordingly, the purpose of this supporting statement is to:
- **Provide some introductory background to the application; a descriptive appraisal of the site, its location, setting and surroundings; to present a detailed description of the proposal; a summary of the pre-application process and identifying any key issues that will assist the reader;**
 - **Identify the key local and national planning policy framework applicable to the proposed development and interpreting these in order to present the detailed case in support of the proposals;**
 - **Summarise the reasons why detailed planning permission should be granted, referring to the scheme deliverables, benefits and net gains this development proposal will offer.**
- 1.5 We consider that this approach will serve to provide the Council with a clear basis for interpretation and decision making. In summary, this statement, along with all the other supporting documentation and plans, demonstrate that the proposed development, subject of this application, is fully compliant with national policy guidance and with the adopted and emerging development plan so as to be acceptable.

The Application Pack

1.6 This Planning Statement (**J10 Planning**) should be read in conjunction with the following plans and documents, which are enclosed as separate items in the associated submission package:

- Pre-Application Consultation Report (PAC) : **J10 Planning**
- Architectural Masterplan and detailed house type drawings : **Base**
- Design & Access Statement : **Base**
- Landscape & Visual Impact Assessment : **The Ark Company**
- Topographical Survey : **MB Surveys**
- Flood Consequences Assessment & Drainage Strategy + Infiltration Assessment : **Coopers and Groundsolve**
- Transport Statement : **Axis**
- Ecological Assessment : **Kingdom Ecology**
- Arboricultural Impact Assessment : **Tree Solutions**

1.7 This list is important as it comprises all the items requested by the Council during pre-application discussions and reflects the guidance provided by Officers; no other items were and have been requested.

1.8 These documents and drawings are all provided with the enclosed application and itemised in greater detail on a separate Planning Application submission schedule spreadsheet.

Site Description

- 1.9 The application site is located upon the southern built up edge of Gresford and its established residential area. Gresford is a large village to the north of Wrexham and is home to some 5,000 residents and around 2,350 households. The name derives from the old English meaning is that of a “grassy ford”, whilst the Welsh derivation is that of a “crossroads”.
- 1.10 The application site comprises an unimproved parcel of previously undeveloped agricultural field that extends to a total area of 2.75 ha (6.8 acres).
- 1.11 The site is generally level in nature but does gently undulate across its length.
- 1.12 There is a public right of way that runs along the eastern boundary of the site (Footpath No 12) which runs between Vicarage Lane and Barkers Lane / Borrass Road to the south and along its route it becomes Footpath No 9. The route is shown on the PROW definitive map extract below.



- 1.13 Perimeter hedgerows and trees run along all sides of the site and they are particularly robust and dense along the eastern, southern and western boundaries which provides a good sense of enclosure and visual containment. The northern boundary along Vicarage Lane is less enclosed but does benefit from hedgerow and a few mature trees.

- 1.14 Direct vehicular access is available to off Vicarage Lane.



- 1.15 The site is highlighted below to show its location, context and position on the aerial map.



- 1.16 The site is located in a most accessible position on the very fringe of Gresford and within walkable range of all its amenities and facilities. The site is well served by public transport service routes that run along the B5445 Chester Road and bus stops exist within immediate walking distance of the site.

- 1.17 The site is considered to be located in a highly sustainable and accessible position to take advantage of existing community facility and transportation related infrastructure and we believe it benefits from very excellent sustainability credentials.
- 1.18 The site is well served by facilities available in Gresford including, inter alia:
- All Saint's PS and the Rofft PS
 - Gresford Recreational Club and Colliers Park
 - Royal British Legion, Gresford Trust Community Hall and another Community Hall on Pant Lane
 - Gresford Library
 - Marford Playgroup
 - Gresford Pharmacy
 - Chapel Cottage Dental Practice
 - Llay Family Doctors
 - Gresford Service Station (with integrated Londis) and PJ Autos
 - Spar (with integrated Post Office) and Co-op convenience stores, butchers travel agents, hair and beauty salons, Cycle shop and taxi service
 - Several Takeaways (the Chand, Yew Tree and Golden City
 - The Plough, The Beeches, Griffin Inn and Pant-yr-Ochain Public Houses
 - Premier Inn at Colliers Park
 - Gresford Sailing Club at "The Flash"
 - Bus Routes : Arriva service No 1
 - Various places of worship across religious denominations; including Christ Church, Gresford Methodist Chapel, the Pentecostal Capel Jerusalem.
- 1.19 This not only demonstrates the highly sustainable nature of Gresford but given that all such facilities are well within walking distance of the application site it shows how accessible they are.
- 1.20 The opportunity now exists to secure the delivery of new housing (open market and affordable) along with other community benefits.

The Proposed Development

- 1.21 The application is made for Detailed Planning Permission. The description of the development is as follows:

“Proposed residential development for 44 no. residential dwellings (of which 25% (11 no.) will be affordable), public open space, landscaping, means of highway and pedestrian access, local highway and pedestrian infrastructure improvements along Vicarage Lane, foul sewerage pumping station and new off-street resident parking provision for existing residents.”

- 1.22 The proposal involves the development of a single parcel of land that extends to 2.75 ha (6.8 acres).

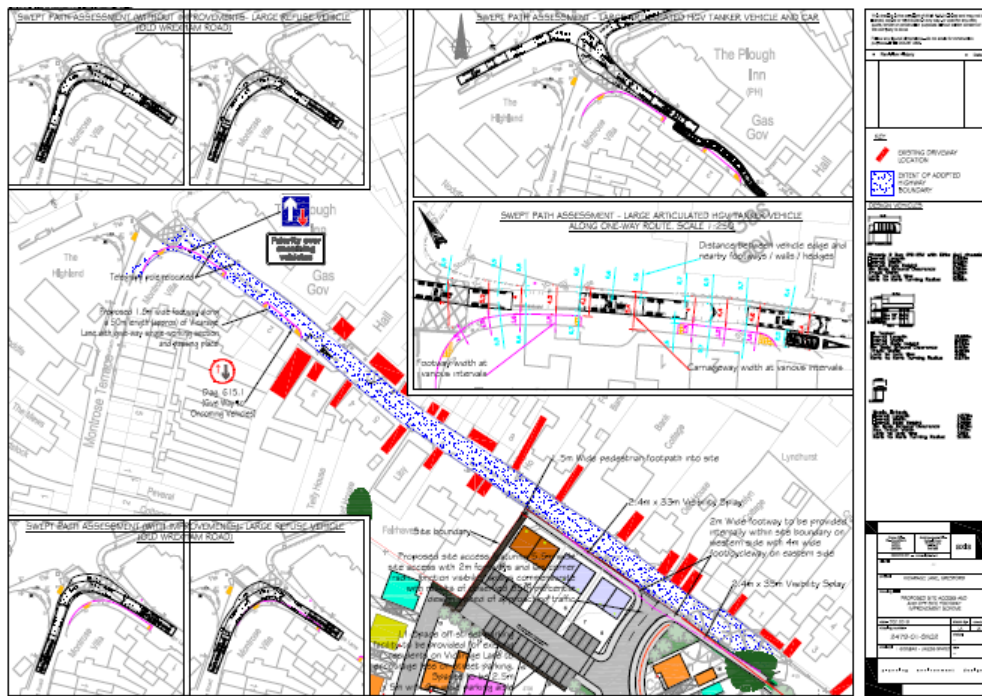
- 1.23 The accommodation schedule comprises the following:

Site Area (ha)	2.75 ha
Site Area (acres)	6.8 acres
1 bed	4 (9%)
2 bed	8 (18%)
3 bed	4 (9%)
4 bed	21 (48%)
5 bed	7 (16%)
Total dwellings	44 (100%)
POS	4,100 sqm (0.41 ha/1.01 acres)
Affordable @ 25%	11 (25%) (4 no. 1 bed and 7 no. 2 bed)
Density (dph)	16 dph

- 1.24 The proposal will deliver 11 no. new affordable housing units; the first that have been delivered in the village for two generations (since around the 1950's) for local people. which are exactly the sort of units that are required to address the known latent need and demand in the locality.

- 1.25 The proposal shall also make educational contributions to local primary and secondary school, where they are required.

- 1.26 Significant levels of public open space (POS) will be provided on site which not only meets but exceeds standards. Indeed, the design philosophy of the development is one that is set around a “village green concept” that will contribute to the quality place-making theme adopted by the developer. The design and layout provides for a density that is reflective of the local “grain” of Gresford and the type, tenure and range of dwellings will deliver and meet local affordable and open market housing needs.
- 1.27 Vehicular access proposed is exclusively off Vicarage Lane, with new pedestrian access into the site also being provided alongside a 2-metre-wide pedestrian footway along the entire length of the sites’ internal perimeter so as to make safe connective access between PROW No 12 and the Chester Road. Currently from the site to Chester Road there is no pedestrian footway along this 342 metre stretch, yet this proposal will deliver 266 metre of new refuge footway (78% of the distance) and through other associated traffic calming improvements this will make for a much safer pedestrian experience.
- 1.28 The applicants appreciate that there is not a footway the length of the lane to the Chester Road but, wherever possible, improvements have been identified to aid safe pedestrian accessibility and these are shown in the Axis Transport Statement; a plan extract of which is provided below.



- 1.29 We can confirm that no trees need to be removed and only very careful and selective hedgerow management is required to ensure the established landscape screening will remain in place along with the perimeter boundaries of the site, with pedestrian pavements located inside of the hedgerows to ensure pedestrian safety and connectivity. The scheme has been designed to ensure that the rural edge is maintained and enhanced and that the style and character befits the location and its surroundings.
- 1.30 The proposals have been developed around a design solution that has embraced and been influenced by all the various technical and professional disciplines employed by the applicant (in particular highways, drainage, trees and ecology) and the guidance conferred by the Council during the informal pre-application discussions and from feedback generated from the more formal WG DMO consultation stage, which has allowed us to adjust the layout and arrive at an acceptable design solution.
- 1.31 The applicant has listened to and been guided by the aspirations, concerns, feedback and guidance from Council officials, statutory consultees and members of the public and is confident that the proposals now represent a scheme of the highest quality and sustainability credentials.

Pre-Application Discussions

- 1.32 The applicant has been keen to engage with Officers in seeking their advice and guidance pertaining to this proposal and embarked upon an engagement process that commenced in July 2017.
- 1.33 The recently assented Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 means that from 1 August 2016 a far greater emphasis upon pre-application consultation with key stakeholders was introduced and a formal DMO process was activated.
- 1.34 This now places and also places a responsibility upon applicants to undertake and follow a pre-application procedure of formal consultation and engagement with key statutory consultees (e.g. NRW, DCWW, etc), the Local Authority, Town/Community Councils, local Ward Councillors and local residents and neighbouring businesses.
- 1.35 It applies to all Major applications (outline or detailed) where the project involves over 1,000 sqm of non-residential space and/or the site exceeds 1.0 ha or where the site involves 10+ residential dwellings and/or a site over 0.5 ha.
- 1.36 This process requires applicants to produce a Pre-Application Consultation Report (PAC) and it is this document that serves to address the policy requirement as set out in the legislation.
- 1.37 We consider that the applicant has duly taken account of the guidance.
- 1.38 In advance of the formal DMO process commencing in August 2018 we undertook detailed pre-application discussions with Officers at Wrexham and liaising with Welsh Water. Additionally, we met and presented the draft scheme to the local Ward Councillor and extended an invitation to engage with and listen to the Gresford Community Council as part of the DMO process.
- 1.39 This process has resulted in several pre-application meetings taking place and exchanges of emails and letters with the Local Planning Authority. The narrative behind this process is provided (see **APPENDIX A**).
- 1.40 The course and intensity of this process is self-evident. The key message was that Officers would essentially be comfortable in supporting the design and technical case were we to follow their guidance. This we have done.

- 1.41 However, for ease of understanding a chronological timeline is provided in the table below:

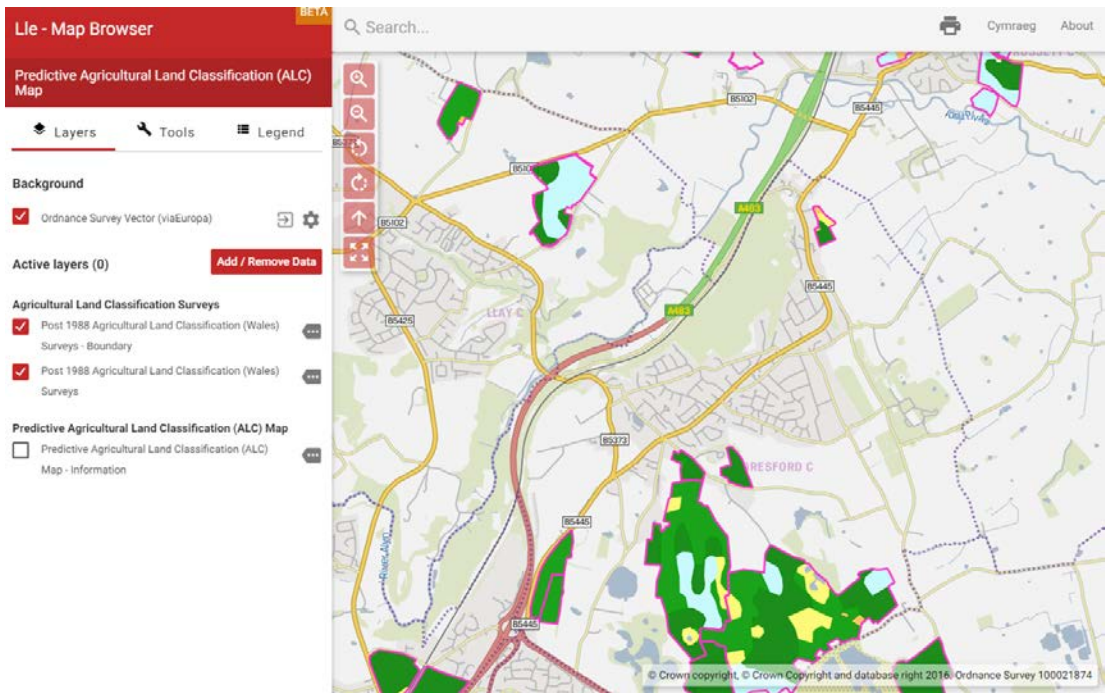
DATE	ITEM / TASK
10 July 2017	1 st Pre-app request lodged with WCBC
1 August 2017	1 st Pre-app meeting held with WCBC
11 August 2017	WCBC feedback letter received (general)
12 October 2017	WCBC feedback received (highway)
23 October 2017	WCBC feedback received (housing)
15 November 2017	2 nd Pre-app meeting held with WCBC
15 to 17 January 2018	Design advice sought and provided
13 August 2018	Meeting with Cllr Andrew Atkinson
24 August 2018	Formal WG DMO pre-submission consultation process commenced
August and September 2018	Formal responses received, and changes made to reflect any concerns raised
20 September 2018	Meeting and presentation to Gresford TC IMAGE Group

- 1.42 Officers clearly recognise the positive impact that delivering affordable housing will have for the local community. It is not lost on the applicant that Gresford has the greatest need for affordable housing in the Borough (sic. Maureen Lee's table below identifies this); yet it is odd that this need is not being addressed by the LDP proposing any housing allocation sites; this can be remedied by this proposal.

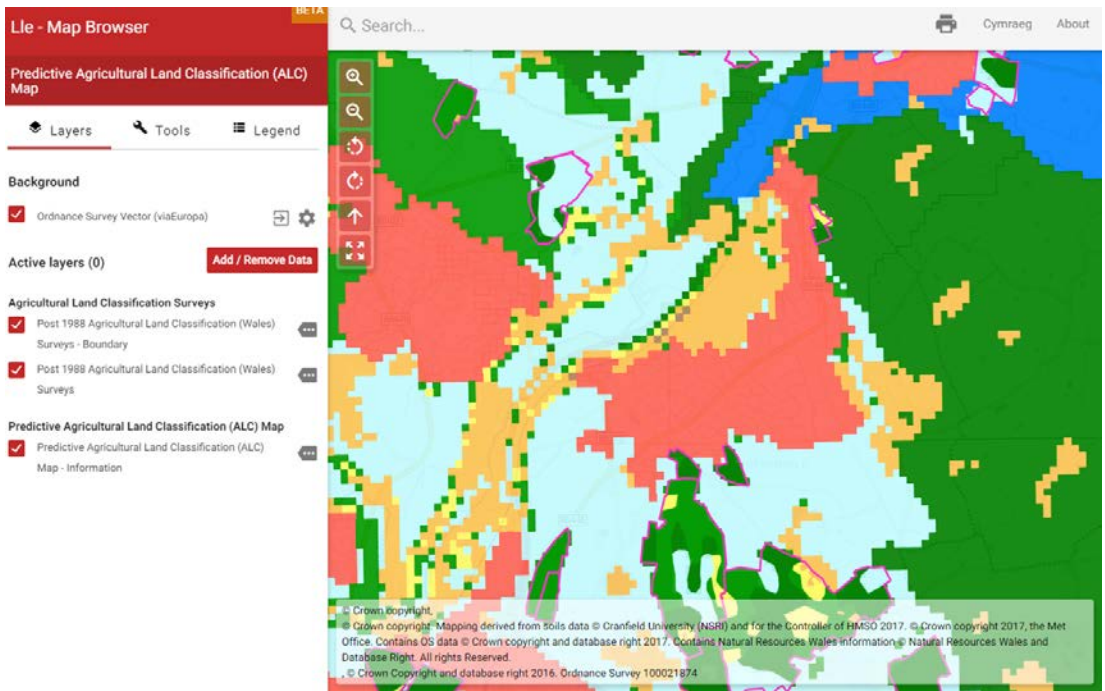
Main Area	Area	1	2	3	4	5	Grand Total
Wrexham Central	Bangor On Dee	21	18	10	1		50
	Bettisfield	5	5	4	2		16
	Bronington	8	12	4	4		28
	Erbistock & Eyton	12		13	4		29
	Gresford & Marford	148	78	42	3		271
	Hanmer	11	9	3	2		25
	Hermitage	173	83	42	9		307
	Holt	62	45	17	8		132
	Meifod Place	89	31	16	5		141
	Overton	44	28	17	2		91
	Penley	25	21	8	5		59
	Pentre Maelor- Isycoed	9	5	12	2	1	29
	Rhostyllen	136	76	40	7		259
	Rossett	117	66	34	4		221
	Tallarn Green - Iscoed	4	5	3	2		14
	Worthenbury	2	3				5

- 1.43 Additionally, Officers also know the implications of having an expired Local Plan and TAN1 (Jan 2015) brings. So long as the Authority is unable to demonstrate a 5-year housing land supply and not have an up-to-date plan in place the housing land supply position is a problem that will not magically disappear.

- 1.44 Moreover, this is unlikely to change for another at least another year until the emerging Local Plan had been adopted. Plan preparation slippage has been severe and it places the Authority in an even more difficult position and all the time with a housing backlog building.
- 1.45 Delivering housing cannot wait and the backlog will simply grow ever larger without permissions being brought forward.
- 1.46 Officers have been positive and recognised that sustainable Green Barrier sites must be released as part of the emerging plan process and have now had to adopt a more flexible policy towards those sites that they know would win support at appeal.
- 1.47 As a result, and in reality, the pressure to release some Green Barrier sites in advance of the plan having reached adoption and TAN 1 will, we believe, be a significant material consideration. The onus is therefore upon the applicant to demonstrate that the Green Barrier in question no longer meets the purposes of its original designation and as such this is what this submission will seek to argue and demonstrate. This is helped, however, by the Council's own evidence base and studies with respect the Green Wedge / Barrier.
- 1.48 In essence, Officer advice has been that in considering the site in advance of the revised Green Barrier advancing through to being confirmed, that it would be prudent for the applicant to address whether or not the site has significant impact upon the purposes of the Green Barrier and that each site will be assessed on individual merits with land supply being a key material consideration. Additionally, landscape assessment and an appraisal of the sites' sustainability credentials will also be taken into account.
- 1.49 Some observers consider that the loss of any edge of settlement land should be resisted due to the belief that it would serve to reduce the quantum of agricultural land. They quote the need to avoid developing Best and Most Versatile land.
- 1.50 We feel it would be helpful to address this item. We agree that BMV of the highest quality (Grade 1 and 2) ought to be resisted and that a sequential approach is applied which favours lower grade land first.
- 1.51 The site has been subject of past surveys and is determined as involving largely Grade 3a and an area of Grade 3b land as shown by the Predictive Mapping extract below.



1.52 The following plan illustrates the same plan as above but with the predictive land classification “turned-on”.



- 1.53 This shows that large swathes of Grade 1, 2 and 3a exist around the settlement so for any release elsewhere it would involve a loss of much better-quality land than that offered by the application site. Therefore, sequentially this site out-performs all alternatives.
- 1.54 We must not forget that quality is one element but that the size and scale of any parcel provides another dimension; so, a site like the application site involves land that is not contiguous with a wider area and is not farmed in a productive manner. This means that its loss would not be harmful compared with a site that might form part of a much larger more agriculturally viable parcel.
- 1.55 We have followed this advice and that is why significant effort has been made in addressing all the technical issues highlighted by Officers. We therefore consider we have satisfactorily tackled and positively addressed and solved the questions posed early on in pre-application meetings.
- 1.56 In summary, Officers have been very positive and helpful in the guidance and advice conferred; they have welcomed the proposal, offered clear instructions as to what they considered necessary for the applicant to submit in support of the application and have helpfully advised the applicant's team as to what they would be comfortable in supporting and recommending, notwithstanding the fact that the opinions offered were those of Officers and not necessarily of elected Members.
- 1.57 Additionally, Officers confirmed that the proposed design solution (its highway and pedestrian accessibility, scale, layout, location, general setting and landscape impact/mitigation) were all acceptable and would form a constructive basis moving forward.

Green Barrier Assessment

- 1.58 The advice provided by Officers was to consider the merit of the site in the context of its (UDP) Green Barrier designation.
- 1.59 The fact is that since the time we entered into pre-application discussions with the Authority in July 2017 the Authority subsequently published its Green Barrier Review in October 2017 and this site is proposed to no longer be classified as Green Barrier once the emerging LDP has been adopted. We consider this must carry significant material weight.
- 1.60 Nonetheless, for completeness, we have still undertaken this assessment.
- 1.61 We consider that the LVIA undertaken underpins the view that the development of this site for residential development forms a logical extension to the settlement as the landscape assessment concludes that the site is visually lost very quickly as you move away from the settlement and the illustrations serve to demonstrate that the impact upon the wider Green Barrier will be negligible.
- 1.62 We have reached the conclusion that this submission has satisfactorily addressed all the technical, design and landscape impact concerns that were first identified / raised by Officers in the early pre-application meetings and indeed, the pre-application correspondence and records between us confirmed that even the Stage 1 Review of February 2016 confirmed that the site would be removed from the Green Barrier (this then being reinforced by the subsequent Stage 2 Review report of October 2017).
- 1.63 Officers clearly confirmed that Green Barrier was no longer an issue for them and we consider that by the final meeting in November 2017 we had reached a consensus position where Officers were entirely comfortable with the scheme and it was now down to the narrative in this statement and other supporting statements to provide the convincing case as to why this Green Barrier site should be developed.
- 1.64 We have, in tandem with this application process, been involved in making submissions to the emerging Local Development Plan and will continue to do so through to the plan being adopted. Our position is that we support the Council's proposed Green Barrier Review.

- 1.65 Members of the Full Council recently (November 2018) approved the Submission version of the emerging LDP and all of its supporting evidence base to Welsh Government for Examination. By default, they have therefore conferred with their Officers' recommendations in supporting Green Barrier release as being acceptable. They had the opportunity to oppose this evidence base but chose not to.
- 1.66 The direction of travel has been established through the LDP process in that it has been accepted that Green Barrier designations now need to be released.
- 1.67 The priority must therefore be given to releasing the most logical and sustainable locations for new development and, to be brutally honest, there are few options which are capable of delivering growth of any scale and substance around Gresford, because so few infill sites now remain.
- 1.68 This location is considered to be perhaps the most logical, unconstrained and sustainable location available, achievable, viable and deliverable.
- 1.69 Turning to Green Barrier policy this is enshrined in **PPW (Edition 9 November 2016) Section 4.8** and reflected locally by the **UDP Policy EC1**; both are provided (see **APPENDIX B**). Essentially in Wrexham Green Barrier designation was introduced, not like its equivalent Green Belt cousin that was designed to have more permanence, but as a lesser local designation with similar features which in PPW are known as Green Wedges.
- 1.70 PPW states (**Para 4.8.11**) that like Green Belts they should only be established through the development plan process and should only be maintained where the Authority can demonstrate normal planning policies could not provide the necessary protection and that the plan should provide why the areas subject of the designation requires extra protection. The Wrexham UDP failed to pass this test in providing any reasoning for the Green Barrier designation over large swathes of land that in our opinion could have been easily protected through some other form of open countryside / landscape policy designation means.
- 1.71 In defining such areas PPW states (**Para 4.8.12**) that factors such as "openness, topography and the nature of urban edges" should be taken into account. We would argue that none of these must have been taken into account when the designation was made to include this site and indeed it is indicative of two Local Plan Review Inspectors that both recommended the Authority undertake such a review.

- 1.72 Moreover, PPW goes on to state (**Para 4.8.13**) that Authorities, in making such designations, should ensure a sufficient range of land is available and is suitably located in relation to existing urban edge. Again, we would argue that Wrexham's UDP failed to identify any such land and drew the settlement boundaries very tight with Green Barrier in between, thus effectively choking out any potential for sustainable natural growth.
- 1.73 In terms of current UDP Policy EC1 this proposal does not accord with and is contrary to the existence of a Green Barrier and would have to be classified as "inappropriate development" as it does not meet one of the exceptions and is a departure from the development plan. The test therefore, has to be that the proposal meets exceptional circumstances where other considerations clearly outweigh the harm.
- 1.74 It is recognised (PPW and UDP Policy) that there are essentially 4 purposes for including land in the Green Barrier and these are:
- o To prevent coalescence of urban areas and villages with other settlements
 - o To assist in safeguarding the countryside from encroachment
 - o To protect the setting of urban areas and villages
 - o To assist in urban regenerations by encouraging the recycling of derelict and other urban land
- 1.75 We will now deal with each purpose in turn and demonstrate that this site no longer functions or meets its definition and its loss would not have a significant impact upon any of its purposes.
- 1.76 **To prevent coalescence of urban areas and villages with other settlements :** the development of this site will contain development within a tightly defined and defensible boundary. The site is visually contained and enclosed by defined physical boundaries. It will not therefore result in any coalescence with neighbouring settlements for the closest defined settlement is Wrexham which is to continue to be protected by a strategic Green Wedge.
- 1.77 **To assist in safeguarding the countryside from encroachment :** the sensitive and sympathetic design solution has been endorsed by Officers and is low density and its character and style has a rural theme to it with large areas of the site devoted to open space (pocket parks) with retention of existing landscaping (trees and hedgerows), new planting, public open space and biodiversity areas. Thus, the countryside will be protected; the site is not "open" but visually

contained and enclosed and its development will not harm or impact upon the wider “openness” of the countryside as demonstrated by the LVIA and artist impressions.

- 1.78 **To protect the setting of urban areas and villages :** the setting of Gresford is not defined by this piece of land but by the more sensitive open parkland to the north side of Chester Road / west of Gresford Lane and the open rolling countryside around Marford. This site does not contribute to that setting and character and the development would also not undermine the setting or character of the southerly fringe of Gresford as has been demonstrated by the LVIA, but instead enhance and redefine its urban edge; the benefit of it being contained by a strong landscape enclosure and that development within it will be discreet and have a soft rural edge to it.
- 1.79 **To assist in urban regeneration by encouraging the recycling of derelict and other urban land :** the development of brownfield land in Wrexham (let alone Gresford) has peaked and the availability of suitable, viable and developable brownfield sites is minimal (to nil in Gresford) to such an extent that few are now coming forward to deliver housing land supply. There is a recognition that Green Barrier and open countryside must now be identified to serve the future needs of delivering jobs, homes and other infrastructure. The Green Barrier is no longer serving this purpose and is undermining regeneration and economic growth. The LDP1 strategy of trying to force all new development into unviable areas and not release any land on the edge of settlements failed and does not work. A new strategy is therefore required as LDP2 emerges and Officers have recognised that a Green Barrier Review is needed as part of this.
- 1.80 Interestingly, local precedent does exist in respect of the Authority agreeing to releasing Green Barrier sites for housing (with housing land supply cited as a principal reason) and some examples of these include the following recent cases in Wrexham:

Case Reference	Commentary
P/2014/0021 Ruabon Business Park site (Wynnstay Farming Co. Ltd – Pure)	Release of green barrier strip to facilitate this proposal was considered to be acceptable in the light of the pressing need for additional housing land. Permission was granted to the owners for a mixed-use scheme of 319 houses, care use, foodstore, pub, light industrial and hotel. It is understood Pure are now signed up to deliver the site.

P/2015/0178 APP/H6955/A/14/2229577 Pont Adam, Ruabon (Castlemead)	On appeal the case was dismissed solely on highway grounds, but the Inspector recognised that housing land supply took precedence and that all other technical matters had been satisfied. Permission has now been subsequently granted for 19 residential dwellings with the highway issue having been resolved.
P/2013/0545 APP/H6955/A/15/3135730 Hafod Tileries, Ruabon (Gladman)	Gladman were refused permission for this open countryside site that lies outside of the closest settlement (Johnstown) but won on appeal for 300 new dwellings. The Inspector noted that the settlement policy (PS1) which seeks to focus growth within defined settlements is effectively out of date and carries limited weight given the lack of housing supply and this outweighs countryside protection policies.
P/2014/0262 Chestnut Court, Summerhill (Castlemead and now SG Estates)	It was recognised that housing land supply outweighed the loss of this Green Barrier site and permission was granted for 20 residential dwellings
P/2014/0815 APP/H6955/A/15/3095184 Trewythen Hall Care Home, Vicarage Road, Gresford (care home owner)	Refused permission for 20 no. assisted living bungalow units and then appealed. However, the Inspector dismissed the appeal. Interestingly, she was not concerned with the lack of any pedestrian linkages (Paras 20 to 23) and safety despite the site being devoid of any pedestrian links. This site however is delivering enhanced linkages, pedestrian routes and traffic calming measures.
P/2014/0480 P/2014/0870 APP/H6955/A/214/229480) Llay New Road, Rhosrobin (Castlemead)	Where permission was refused for this Green Barrier site despite recommendation of approvals by Officers. Appeals were duly lodged. The Inspector found against the release of the site because in his view the lack of a housing land supply whilst accepted did not outweigh other factors, including the very nature of this site in that it would lead to coalescence, reduction in openness and encroachment.
P/2015/0790 Boozey Fields, Gwersyllt (Gower Homes)	Permission approved for 54 homes in the Green Barrier : it was recognised that housing land supply trumped the Green Barrier and that this site met all technical and design and landscape objectives; it is now a draft allocation in the emerging LDP
P/2014/0905 APP/H6955/A/16/3147116	Permission granted on appeal for up to 365 dwellings on edge of settlement in open countryside.

Home Farm, Llay (Bellway / Anwyl)	
P/2016/0189 APP/H6955/A/17/3182282 Land east of Tan y Bont Road, Rhosrobin (Liberty)	Permission was refused for this Green Barrier site by the Authority. It was appealed, and the Inspector found in favour of the site. However, Welsh Government Ministers called in the light of TAN 1 Para 6.2 and they have requested the views of the Council and appellant. The appellant has requested the Hearing be re-opened. Our view is that unlike other sites the emerging LDP evidence base does not recommend any change in the Green Barrier designation here, so the site may be more vulnerable. However, the fact the original Inspector was looking to allow the appeal does indicate that the Authorities Housing land supply position (and by default their Green Barrier designation) is vulnerable. Approval would set a clear precedent.
P/2017/0651 Land north of Chestnut Close, Summerhill, (Macbryde Homes)	An application is in for 82 dwellings on this Green Barrier site; yet like the Liberty Rhosrobin site the site is being identified as being retained within the Green Barrier in the emerging LDP. Should this site be approved then it would effectively open the floodgates to other Green Barrier sites.

1.81 In summary, our case, in demonstrating that this development proposal meets the exceptional circumstances test as set out in PPW, is grounded in the following:

- the Authority cannot present any case for a 5-year housing land supply;
- that TAN1 is of significant material weight (apart from our reservations on the recent dis-application of para 6.2);
- that the Green Barrier has found that this site be released from its restrictions;
- that our case is supported through all technical, landscape and design evidence presented in support of this application;
- there are a range of significant benefits (as presented in our summary conclusions section at the end of this statement; these offering a range of economic, social and environmental deliverables and roles) and;
- the site does not meet any of the 4 purposes of including and retaining the land within the Green Barrier.

1.82 These cumulatively present a compelling case as to why this scheme should be supported and granted planning permission.

2.0 PLANNING POLICY CONTEXT

- 2.1 The purpose of this section of the statement is to set out the sequence of planning policy that is considered relevant to the consideration of this application; these are separately examined in detail by assessing and interpreting the merits of the proposals against them, with a view to demonstrating the case in support of the development proposals. The legal test for all planning decisions is to determine the application in accordance with the statutory development plan unless material considerations indicate otherwise.
- 2.2 A material consideration will be whether the plans are up to date. We have adduced that, in this instance, the development plan (for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004) comprises the Development Plan (the **Wrexham Unitary Development Plan**) which was adopted in February 2005.
- 2.3 S38(6) confirms that in determining planning applications “any determination must be made in accordance with the development plan unless material considerations indicated otherwise”. Case law (such as *R. Cummins v Camden LBC* 2001) has established that for a proposal to be in accordance with the Development Plan it is not necessary for it to accord with each and every policy, rather it should conform with the plan as a whole.
- 2.4 Moreover, a more recent judgement (*BDW Trading Ltd. (T/A David Wilson Homes (Central, Mercia and West Midlands) 27 May 2016*)) involved the judgment of Lord Justice Lindblom which offers yet another example of Section 38(6) duty being examined and scrutinised in the Court of Appeal. The appeal was brought about when questions were raised as to whether or not an Inspector, deciding an appeal against a refusal of planning permission on a residential scheme of 114 dwellings, failed to discharge the duty, under Section 38(6) of the Planning and Compulsory Purchase Act 2004, to make the decision in accordance with the development plan unless material considerations indicated otherwise. Lord Justice Lindblom offers some much-needed clarification on the law and the judgment clearly reiterates that the approach to planning decisions is not and should not be rigid and the person making the decision has some scope and autonomy in how they approach the policy position.

- 2.5 The next step is to consider whether any “other material considerations” indicate otherwise. This will include assessing whether the proposals are in conformity and accordance with national policy (the Welsh Spatial Plan, Planning Policy Wales, TAN’s, Interim Ministerial Planning Statements) and any non-statutory guidance (e.g. best practice). We have done this exercise and adduced that national and non-statutory considerations also support the proposals.

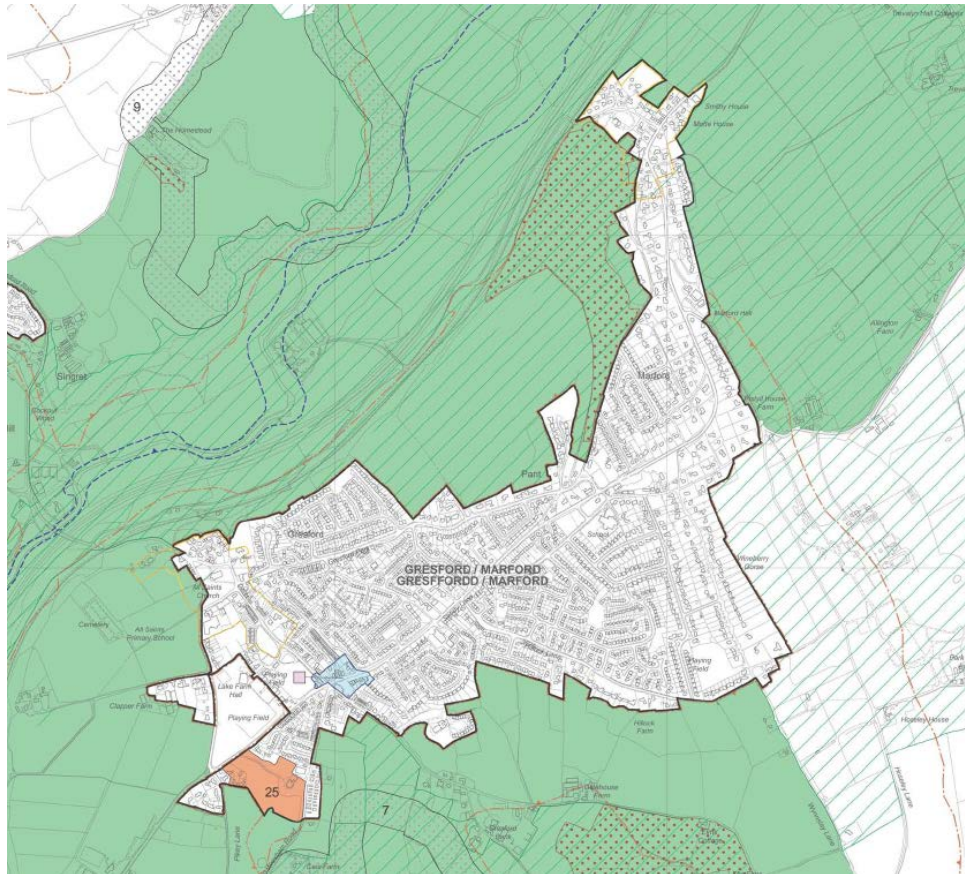
Local Development Plan

- 2.6 The starting point of any local planning policy assessment must be the Development Plan.
- 2.7 The principle Development Plan for the site comprises the “**Wrexham Unitary Development Plan**”, which was adopted in February 2005 and whose plan policies are currently being used for Development Control purposes. The plan period runs from 1996 to 2011.
- 2.8 Given its primacy, adopted status and the fact (most of) its policies are considered to be (generally) up to date, a degree of weight can still be attached to the relevant policies therein. However, this must be tempered by the fact that the plan has technically expired and in the light of TAN1 guidance (January 2015) the Authority can no longer demonstrate a 5-year housing land supply and moreover, there are National policies that have come on-stream since that must be afforded significant weight.
- 2.9 The Authority is now embarking upon a replacement for the UDP in the shape of a Local Development Plan (LDP) which will cover the plan period 2013 to 2028, but the plan has not been through Examination and been adopted and until it has been then PPW9 Para 2.14 must apply. At the time of writing the LDP has reached the Submission Plan stage with a full suite of evidence base and draft policies and allocations; so, we consider that significant weight must apply despite it not having been subject of Examination or a binding Inspectors Report.
- 2.10 Indeed, an amended Delivery Agreement was approved by Welsh Government (WG) on 11 October 2017, which sets out a timetable that suggest the plan will be adopted during Spring 2019; as shown in the table below.

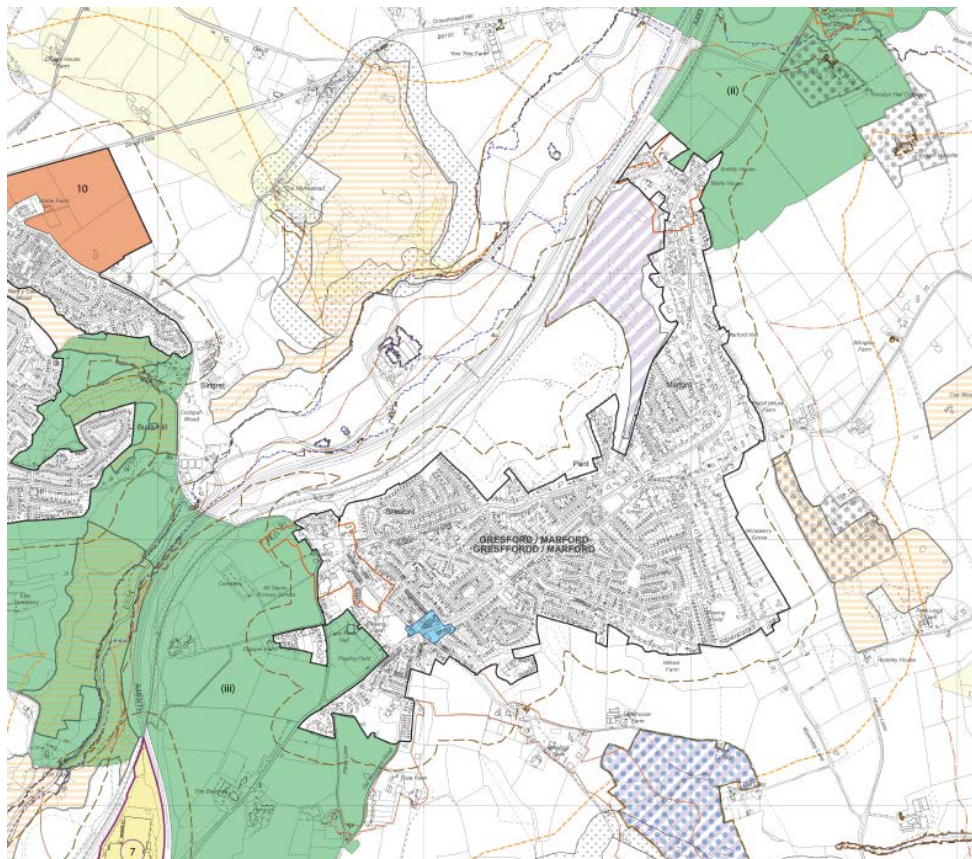
STAGE	NOTES	DATE	STATUS
Approval of a refreshed delivery agreement	Publication and approval	11 October 2017	Approved
Publication of Deposit Plan for consultation	Consultation	April to May 2018	Completed
Review of responses, reporting to Planning Policy Panel, Executive Board and Full Council for approval to submit to WG		TBD	Awaited
Production of Focused Changes and inviting alternative sites		TBD	Awaited
Submission of plan to WG for Examination		November 2018	Anticipated
Independent Examination to test soundness of plan	Dependent upon WG availability	TBD	Awaited
Inspectors Report	Publication		Awaited
LDP Adoption	Must be within 8 weeks of receipt of a binding Inspectors Report	Spring 2019	Anticipated

- 2.11 There has been some slippage and the Examination is likely to take place in March 2019 and if the plan is found to be “sound” it could be adopted by the latter part of 2019. This will give the plan just 8.5 years of the plan to run.
- 2.12 The Authority produced a “Strategic Green Wedge Review : Stage 1” report in February 2016 as part of their Preferred Strategy consultation exercise. The stage 1 review was limited to just Wrexham town and the Western villages.
- 2.13 This study has, more recently, now been enhanced by the Stage 2 report (doc. ref. EBNB01) dated October 2017 that has sought to address the fuller Green Barrier context of Wrexham to include the areas of Green Barrier around Rossett, Marford and Gresford (the relevant extract to this document is provided – see **APPENDIX C**)
- 2.14 It proposes to retain strategic Green Barrier between Rossett and Pulford; between Rossett and Marford/Gresford and; between Rossett and Trevalyn.
- 2.15 But importantly it recognises that Green Barrier ought to be removed covering the area comprising the application site as it would not materially lessen the gap between Gresford and Wrexham, with this being protected by retained Green Wedge between the settlements. This concurs with the findings of our Landscape & Visual Impact Assessment and is consistent with Para 4.8 of PPW9.

2.16 This is illustrated by the Proposals Map extracts shown below.

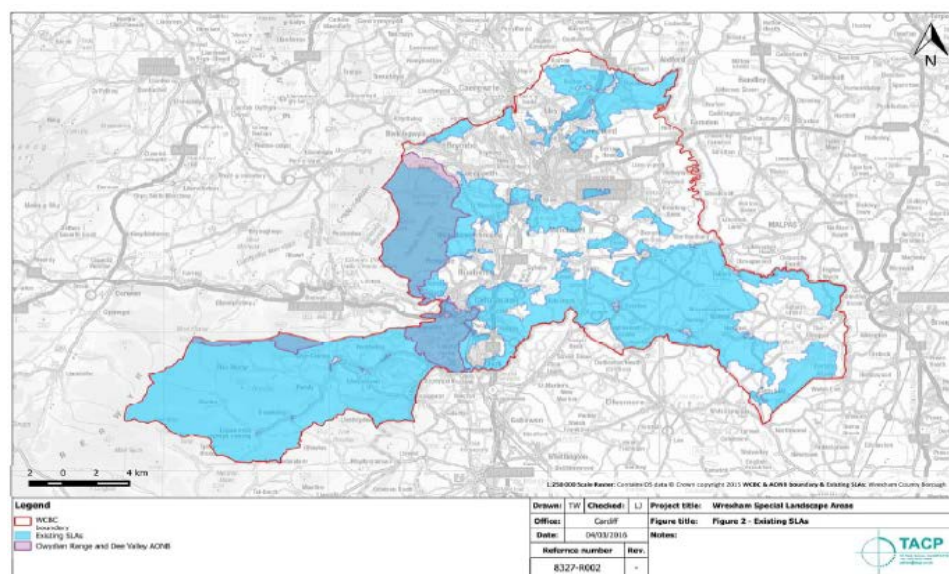


Existing UDP (Green Barrier) Proposals Map

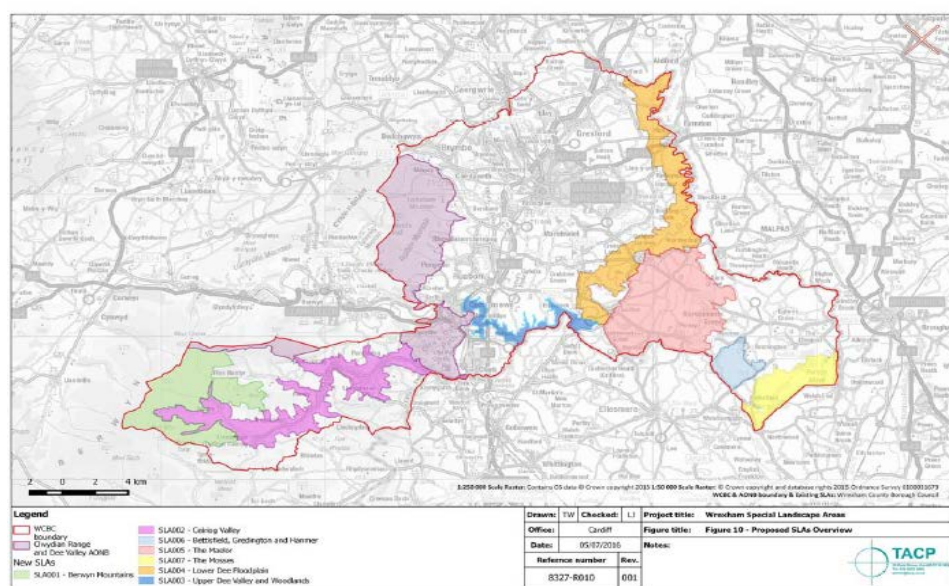


Proposed LDP (Green Barrier) Proposals Map

- 2.17 Furthermore, the consultation (Deposit) stage also involved consideration of the UDP landscape policy designation of Special Landscape Areas. Evidence base has been prepared on behalf of the Authority by TACP and an SLA Study undertaken in January 2017 (doc. ref, EBNB03) which finds that land ought to be released from this designation in compliance with PPW guidance and the assessment undertaken.
- 2.18 The Authority have followed this advice and dramatically reduced the area of SLA, which again concurs with the Landscape & Visual Impact Assessment report we have undertaken; as shown on the plans below.



Existing UDP SLA areas



Proposed LDP SLA Areas

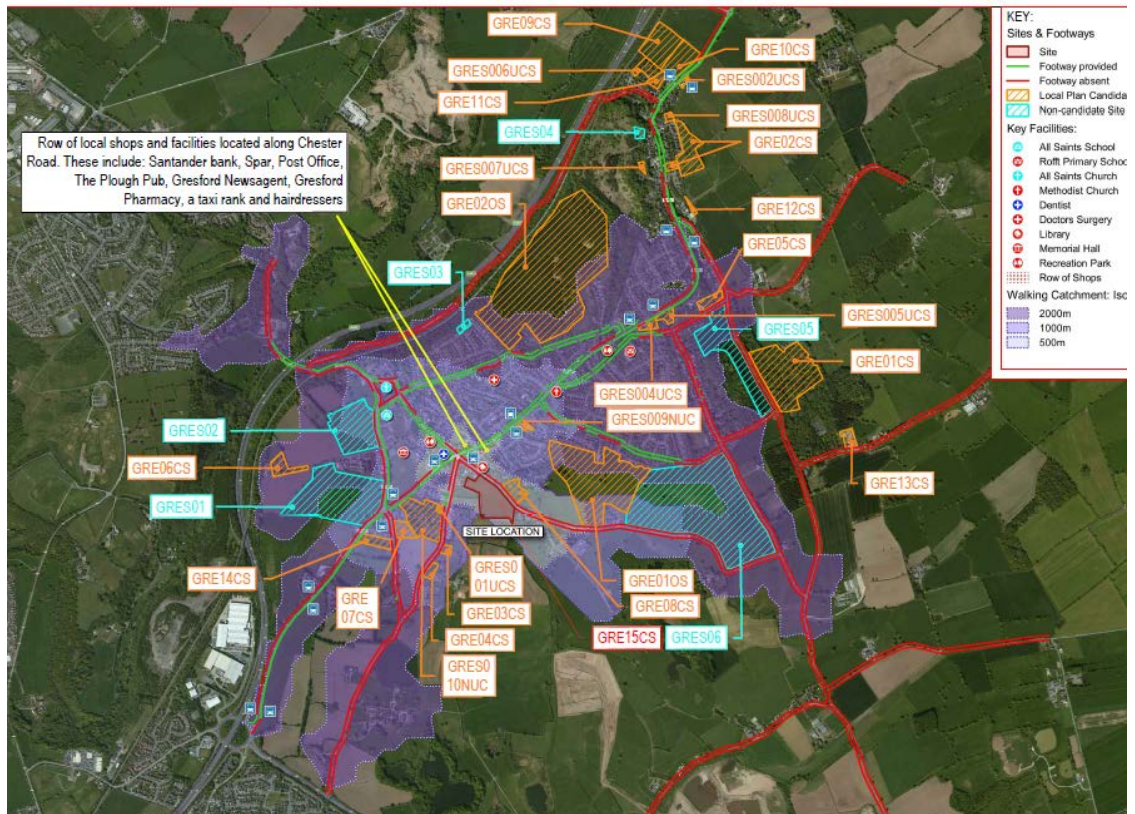
- 2.19 The Council's published LDP2 Deposit Plan (doc. Ref. KSD04 dated March 2018) seeks to deliver 8,525 dwellings over the plan period. This plan has been "submitted" to the Welsh Government now (November 2018) for Examination.
- 2.20 Gresford/Marford presently lies within a proposed Tier 2 "Key Service Settlement" (along with Acrefair/Cefn Mawr, Chirk, Coedpoeth, Gwersyllt, Llay, Rhosllanerchrugog and Ruabon.
- 2.21 We have, through LDP representations, argued that Gresford ought to be making provision for new housing given its hierarchical status. In our opinion it is clear that Gresford must seek to deliver more than just infill and needs to provide some form of substantive new housing contribution to ensure its future sustainability and existing services and facilities can be maintained.
- 2.22 This application site will serve that function and importantly will also seek to address the delivery of important new affordable housing needs facing the community that simply cannot be resolved and addressed by other alternative sites. The option of relying upon infill will not deliver any social and community benefits and only something of a scale akin to the application site will do this.
- 2.23 We are aware of smaller housing sites, but these fall under the threshold for community betterment (e.g. affordable housing) and the local community will gain nil benefit from them as a result, unlike the application site which will deliver 11 no. new dwellings for this tenure.
- 2.24 The trouble that Gresford faces is that without the Council making any allocation it has very few opportunities for anything other than minor infill as no meaningful brownfield sites exist and the settlement is (presently under the UDP) tightly bound and constrained by the Green Barrier and Special Landscape Area designation on all sides. Thus, any new development must involve a release of greenfield land.
- 2.25 We consider that the only logical location to release land is upon the application site as the rest of the settlement faces some serious challenges.
- 2.26 The Transport Statement includes, at Appendix F, an illuminating study of every possible development site in and around Gresford. The applicant undertook this study to consider how much of Gresford suffered (like many other Wrexham communities) from a lack of pedestrian footways because the Highway team at WCBC alleged that the site was not ideally able to provide full pedestrian routes to Chester Road.

2.27 The study demonstrates that this site is not unlike the rest of the settlement and it shows areas of the settlement with and without pedestrian access.

2.28 However, it also became a study to consider the comparative merits of this site against all other possible alternatives and the mapping (provided below) and its associated site sustainability assessment spreadsheet considers how well each possible development site performs in accessibility and sustainability terms.

2.29 It is clear from this assessment that :

- The application site is not unique in not having full pavement links to the village core and indeed Appeal decisions back this up (sic. Trewythen Hall)
- The application site does however, offer the ability to enhance such links and introduce improvements
- The application site scores better than the vast majority of alternatives
- Gresford is highly constrained by virtue of Green Wedge to the north between Marford and Rossett and the south between Gresford and Wrexham; the A483 to the west is a natural boundary and comprises a large amount of topographically challenged land; a network of narrow lanes proliferate, particularly to the east where there is no absolutely no opportunity for connectivity back into the village and its amenities; and more open parkland setting to the north west being a lot more sensitive



- 2.30 We therefore consider that the application site outperforms all other alternative sites that have been promoted or identified in the emerging LDP as potential sites.
- 2.31 This application site will be able to deliver a host of community benefits and meaningful levels of affordable housing that will serve to meet the needs of the community over the current plan period. It offers an entirely logical and sustainable extension to the village with access to local services, facilities and infrastructure, free of constraint.
- 2.32 The Authority has logically and rationally found, through its own LDP evidence base, that the application site cannot be constrained by Green Barrier or SLA designations. We consider it is free from constraint, is deliverable and ought to be allocated.
- 2.33 In the meantime, the approach should be to identify the provisions of the (existing and emerging) development plan and determine if the application is in accordance or in conflict. If in compliance (as is the case here) the starting point will be to approve proposals by granting planning permission as the decision is in accordance with the plan.
- 2.34 The extract of the UDP proposals map (provided above) presently illustrates how Gresford is enclosed by a Green Barrier and Special Landscape Area designations.
- 2.35 The application site is located to the southerly fringe of the village. The Green Barrier Policy EC1 and the Special Landscape Area Policy EC5 of the UDP are therefore considered the most relevant policies applicable to this site.
- 2.36 However, besides this policy we have assessed and tested the proposals against all relevant policies from the Adopted LDP and consider the principal policies listed in the table below to be the most relevant and appropriate in this instance.
- 2.37 Rather than simply reiterating what each policy seeks to achieve in great detail, since the Council will be entirely familiar with this, we will spend time emphasising and providing reasons why the proposal and the principle of the proposed development meets and conforms with these policies as set out in the table the follows below.

POLICY	APPLICATION CONFORMITY
PS1 Broad Location of Development	Development ought to be directed to within defined settlement boundaries. However, the plan has expired and insufficient land exists to provide for new development and in the absence of a 5-year housing land supply the next best sustainable locations must be positively considered and these are likely to be on the edge of settlements.
PS2 Broad Location of Development	Development ought not to materially or detrimentally affect countryside, landscape/townscape character, open space or the quality of the natural environment. Our evidence (design, landscape, tree, ecology) demonstrates that the proposal will not harm such interests by virtue of the sites enclosed and contacted character and the retention of tree/hedgerow and ecological habitats.
PS3 Broad Location of Development	Development should preferably use previously developed brownfield land wherever possible and where greenfield land is used that it should avoid Grade 1, 2, 3a quality and land of ecological, landscape or amenity value. We are aware that whilst the site is greenfield and may be largely Grade 2, so are the alternative sites around Gresford, but none of them offer the same level of sustainable access and wider community benefits that this site does.
PS4 Broad Location of Development	Development should maintain the existing settlement pattern and character and be integrated with the existing transport network to reduce the need to travel by private car and offer alternatives. The proposal demonstrates that the integrity of the existing settlement will remain and that this site is located in a highly accessible and sustainable location to take advantage of public transport modes.
PS8 Transport	We have shown that the site is located in a position that enables maximum use of travel options in a highly sustainable manner and will encourage walking, cycling and public transport connections.
GDP1 Development Objectives	This policy seeks to ensure that all new development meet the following criteria: a) Character, appearance, design and layout b) Personal and community safety c) Design techniques to conserve energy and water resources d) Ensure safe/convenient pedestrian and vehicular access and making connections/links e) Convenient access to public transport f) Ensure amenity of environment are safeguarded from odour and noise effects g) Secure public services. h) Safeguard nature conservation habitats. i) Ensure that development is not subject to flooding, contamination, etc on or off site. j) Have regard to any Welsh linguistic identity. k) Secure the development of sustainable communities through economic, social and environmental wellbeing.

	The Council must accept that despite the proposals being detailed there may be items that need to be conditioned. The applicant considers that the Policy is met by the proposal and the submission demonstrates this.
GDP2 Capacity of Infrastructure & Community Facilities	There is no evidence that the proposal would result in any local infrastructure (highway, drainage, etc) or community facilities (education, health, open space) becoming deficient as a result of this development being implemented. Officers were asked during the pre-application process and they did not identify any deficiencies. Any need to provide for additional capacity must therefore be demonstrated by the Authority and if any gaps in provision can be proven to exist then the applicant will consider whether any such requirement can be provided ... such requirements must be fairly and reasonably related in scale and kind and not be disproportionate to the development proposed.
EC1 Green Barriers	PLEASE REFER TO OUR COMMENTARY UNDER PREVIOUS SECTION Paras 1.45 to 1.68 : Green Barrier Assessment and also 2.13 to 2.16. NOTE : the emerging LDP Deposit Draft (Submission Version) and its associated evidence base has reviewed the extent of the Green Barrier and found it should be "rolled back" and this designation will no longer apply under any adopted LDP; this must carry significant weight. Nonetheless, the community benefits (affordable housing, etc) are considered to merit very special circumstances, with all other things considered, meaning the proposals must be allowed.
EC2 Agricultural Land	This policy seeks to protect the loss of grade 1, 2 or 3a agricultural land. The fact is that this field is not linked to others and this prohibits high yields and all-round year crop harvesting and so it has natural limitations. We therefore contend that its loss would not have any significant implications, particularly since it comprises a piece of land that is not contiguous with a wider parcel of land that would be easier to cultivate were it part of a much wider landholding, but because it comprises just 2.75 ha in size which is well below the recognised threshold of land that could be realistically considered viable as a standalone functioning agricultural unit. Moreover, any land release around Gresford would result in the loss of much higher quality graded land.
EC4 Hedgerows, Trees & Woodland	This policy seeks to protect and conserve such features in order to enhance the character of the local landscape. The scheme submitted has been very careful to ensure that any loss is absolutely minimal; in particular those already providing a landscape buffer to adjacent uses and those that contribute to its inherent rural / urban fringe character. These features shall be maintained and managed and the illustrative layout has integrated them, with only minimal setting back to enable plenty of mitigation through new planting. Moreover, the root protection zones of all trees have been shown to be protected and no overshadowing will impinge upon new residents.

EC5 Special Landscape Area	This is a blanket policy which seeks to conserve and enhance the landscape. The LVIA has addressed this policy in more detail, especially setting out that the visual impact of the development will not harm any nearby or distant viewpoints. The policy does not prevent development but seeks to ensure it conforms to a high standard of design and landscaping which we consider the proposals have done; particularly given the enclosed nature of the site. NOTE : the emerging LDP Deposit Draft (Submission Version) and its associated evidence base has reviewed the extent of the SLA and found it should be “rolled back” and this designation will no longer apply under any adopted LDP.
EC6 Biodiversity Conservation	Our ecological investigations have demonstrated that there are no special biodiversity habitats of special importance in existence across the site but despite this the retained boundary landscaping features will serve to enhance the opportunities for existing habitats.
EC12 Development & Flood Risk	The Drainage Strategy report provided does not suggest that there will be any unacceptable risk of site flooding on or off site.
EC13 Surface Water Run-off	The Drainage Strategy report provided does not suggest that there will be any unacceptable adverse impact as a result of surface water run-off.
H1 Housing Allocations	This policy states that sufficient land will be allocated for housing between 1996 and 2011. This term has now expired and the policy is silent on providing beyond this date. As it is, the Council are unable to demonstrate a 5-year housing land supply (less than the previously published 3.1 years in 2014 – which apparently is now down to 1.14 years in 2016) and moreover in the light of TAN1 (Jan 2015) this has been effectively “zeroed” because the Authority has an expired plan. Thus the lack of a sufficient supply is a significant material consideration that must be afforded the maximum weight in favour of supporting this development.
H7 Affordable Housing	This policy seeks a contribution on sites over 25 dwellings. SPG28 recommends a provision of 25% and the applicant accepts this and is proposing to deliver this.
CLF5 Open Space Requirements from new Residential Developments	This policy seeks 0.4 ha per 50 dwellings; thus, reflecting SPG10 and this equates to 80 sqm per dwelling. For a 42-unit scheme this would equate to 3,360 sqm. The applicant has presented a scheme with a layout which indicates a quantum of 4,100 sqm which equates to 93 sqm per dwelling; thus far exceeding the requirement. The proposed route of maintenance and managing POS will be through a resident’s management agreement (annual service charge), which will remove the need and responsibility from the public purse.

	Officers have expressed a preference for good quality design and are comfortable with the level indicated; this can however be better addressed at any Reserved Matters stage.
T8 Parking	In conformity with SPG16 adequate parking provision can be made to satisfy standards based upon the illustrative layout submitted.
T9 Walking, Cycling and horse riding Routes	The proposals are looking to ensure opportunities for pedestrian and cycling access routes are integrated, with linkages and connectivity through and into the site.

2.38 Moving onto the emerging LDP, the published Deposit Draft comprises a series of policies that the Authority are seeking to apply once the plan has been adopted. Some degree of weight must now be afforded these (and their associated evidence base). However, the Authority has failed to identify any allocations in this Tier 2 settlement and we consider this to be “unsound” and will be challenging this at Examination.

2.39 In reaching this decision the Authority have produced a Site Register of comments and Officer Responses (doc. Ref. KPD14a dated January 2018); in which it provides a summary of comments made at the Preferred Strategy stage in relation to each and every candidate site in Rossett (and indeed across the County Borough). This is reproduced in the table below.

Gresford (Vicarage Lane) : GRE15CS	
Concern Raised at Preferred Strategy LDP Stage	Officer Response
Strongly object - would have a serious and detrimental impact upon Gresford. The valuable Green Barrier land and Open Space should be protected. It will spoil the rural character of Gresford. This is high quality agricultural land. It would be contrary to nature conservation policies damaging wildlife species and habitats. Vicarage Lane is narrow and would not allow two-way traffic. It would increase traffic to unacceptable levels. Local infrastructure and services cannot support extra traffic.	Comments noted. There are constraints on the site (ecology, highways, trees) which may be possible to overcome but there are more sustainable sites proposed for allocation. It is not therefore proposed to be allocated in the LDP.
Strongly object. The Green Barrier land and open space should be protected. It would have a detrimental visual impact and spoil the rural character of Gresford. This is high grade agricultural land. It would be contrary to nature conservation policies damaging wildlife species and habitats. Vicarage lane is narrow and unsuitable for two-way traffic. Traffic would be increased to an unacceptable level. The local infrastructure and services cannot support extra development.	

Land used for agriculture. Vicarage Lane is a peaceful lane much used by walkers, joggers and cyclists and is not suitable for further housing development.	
Main concerns are traffic generation and road safety on a narrow lane with no pavements risking families and children; loss of rural aspect and character; loss of valuable agricultural land;	
Vicarage lane is narrow with no pavements or street lighting with cars parked on the lane (lack of off road parking) narrowing the carriageway to one lane, there are also regular milk wagons creating congestion. Object to the loss of a greenfield site with impacts on ecology and habitats.	
Loss of grade 2 farm land. Vicarage Lane too narrow for increased traffic volumes. Entrance to site opposite consultee's property, development would impact their residential amenity and impact upon highways safety of the property.	
Encroaches into the Green Barrier and Special Landscape Area and would not be logical extension of the settlement limit. Green Barrier necessary to provide a breathing space between the village and Wrexham and to preserve and protect its rural character. Vicarage lane is narrow with no pavements with much on-road parking, no parking for the library, used by large milk lorries – development would be a danger to pedestrians, cyclists.	

2.40 The citations in the table above refer to a slightly larger site area as identified in the Council's associated KPD07 Site Register document; a copy extract of which is provided below.

WREXHAM LOCAL DEVELOPMENT PLAN 2013 – 2028

SITE REGISTER

Site Ref: GRE15CS

Site Address: Land South of Vicarage Lane and East of Old Wrexham Road, Gresford

Settlement: Gresford/Marford

Community: Gresford

Ward: Gresford East & West

Size ha: 4.4

Greenfield: Yes

Brownfield: No

Settlement Hierarchy Tier: 2

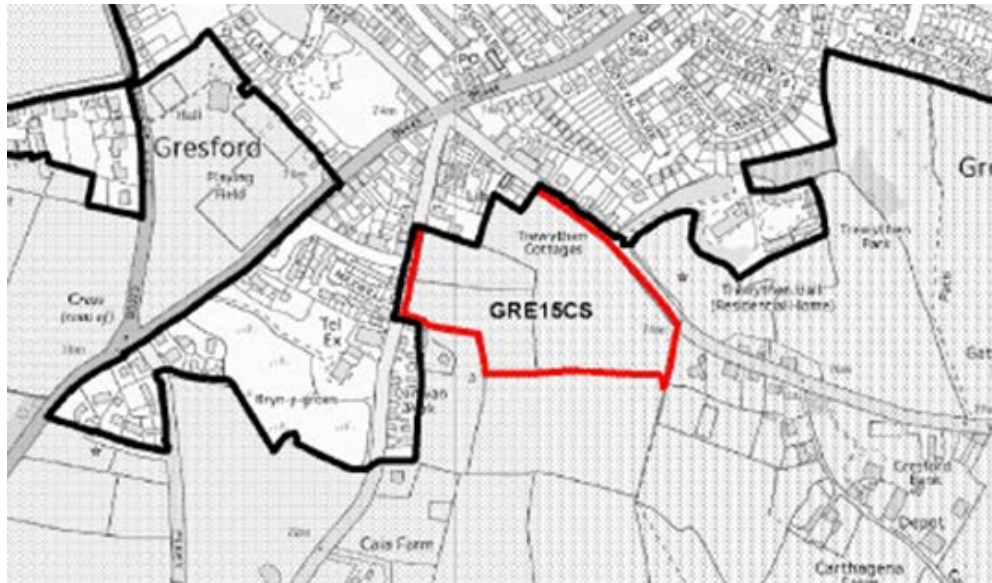
Current Use: Vacant Land

Proposed Use: Mixed Use

Small Sites: No

Large Sites: Yes

Comment: There are constraints on the site (ecology, highways, trees) which may be possible to overcome but there are more sustainable sites proposed for allocation.



2.41 In response to the comments submitted and the Officer response we would like to submit the following observations :

- The site is fully available, viable and suitable. There are no site constraints impeding deliverability.
- The applicant has demonstrated that no ecology, tree, drainage or agricultural land quality constraints exist.
- The applicant believes there is no rational highway reason to object to this site coming forward; a package of enhancements and improvements are being proposed and caselaw backs the applicants position up (sic. Trewythen Hall appeal)
- There is no evidence from any party that demonstrates the sites development would exceed service capacity. We are confident that through appropriate dialogue with third parties that all services will be provided and improved if required.
- The applicant is ready to bring this site forward for development, as is demonstrated by the submission of this application and the investment thereto.
- The applicant considers that the evidence submitted in support of this application demonstrates that the application site is the most sustainable located one available, with strong links to key infrastructure and services.
- We have proven (through a host of our own evidence base that there are no known technical environmental or engineering constraints in bringing this sites forward for development.
- All known issues (e.g. drainage/floodrisk, ecological, highway/access, minerals, agricultural land quality and tree have been addressed.

- The sites development capacity has been tested to demonstrate that development can be accommodated.
- Most importantly though, any claim that there are more sustainable sites proposed for allocation in Gresford is simply incorrect; Gresford has no allocations and this site is needed to ensure the Council deliver on their housing land supply commitments.

2.42 We have assessed the proposal against some of the key relevant policies from the emerging LDP Deposit (Submission version) Plan and consider the principal policies listed in the table below to be the most relevant and appropriate in this instance.

POLICY	COMMENTARY
SP1 Housing Provision	Policy also seeks to “maximise” the delivery of affordable housing where a need is identified, recognising the varying levels of development viability across the County Borough and also seeks to achieve a minimum density of 30 dph, whilst having regard to the context of the site. The supporting text to this policy states that the Council must make sure that any extra cost placed on developers does not render schemes to become unviable and ultimately, not delivered. We support the Council's understanding of this position. There is a risk and concern amongst the development industry that by applying a density target and requiring affordable housing at 40% will make every scheme unviable and unattractive to the development market. Given that the draft allocation seeks 42 units this equates to 15.3 dph so the ambition of 30 dph is considered unrealistic. The applicant considers that the layout and mix of dwellings is reflective of the local grain and character of Gresford and to increase the density beyond and towards 30 dph would not be consistent with urban design and placemaking principles.
SP2 Location of Development	Gresford, being classified as a Tier 2 settlement, given its scale, function, high levels of sustainability and available services/facilities ought to be identified for allocations and this site fits the bill perfectly.
SP6 Planning Obligations	This policy sets out a shopping list of items that could be sought from developments; our caution and concern is that it needs to recognise and include a viability mechanism to ensure that schemes are not “over-loaded” with challenging obligations and moreover that some prioritisation is given so developers can be clear on what items are most important. A host of deliverables are already being presented and these are considered appropriate and reasonable; to “load” more obligations on a scheme (beyond these and the standard affordable, POS and education contributions) would harm viability and deliverability. The main concern of the applicant is in relation to the pressure on the affordable housing triggers in Policy H2, whereby a potential policy

	requirement of 40% affordable housing, will render any site (including this, as undeliverable.
SP7 Green Wedge	Although not designated as Green Wedge the applicant supports the need to maintain a strategic gap between Marford and Rossett and between Gresford and Wrexham.
SP14 Health and Wellbeing	Presently there is access to healthcare facilities at Llay and Rossett. It is a shame that the Betsi Cadwaladr University Health Board have taken the decision to close the Gresford surgery and also regrettable that they have not appeared to have involved themselves in identifying an accurate capacity and need model, let alone a coherent investment programme in meeting the needs of residents across the County Borough.
NE6 Waste Water Treatment and River Water Quality	The Coopers/Groundsolve reports confirm that satisfactory foul and surface water drainage solutions exist.
H1 Housing Allocations	Notably, we cannot support the fact that no allocations are made of Gresford. This site offers the opportunity to deliver new much needed housing in the early stages of plan period.
H2 Affordable Housing	This policy seeks contributions on all sites above 10+ units in line with area based target quotas. Whilst it states that the quotas are the starting point for negotiation on a site by site basis, the same applied to the UDP where the target was 25% (with a threshold of 25 units). Regrettably, Officers (and Members + others) will not look at the word "negotiation" and simply assume that the level quoted is the level that should be met and as such no discretion or flexibility ends up being enabled. The danger is that the 40% quoted will be the expected level. At present this policy is unsound and does not refer to any viability mechanism. Sites of less than 10 units will be expected to deliver a commuted sum contribution but this is not explained in any further detail. This may end up making a whole host of sites unviable and perhaps one ought to consider that adjoining Authorities (sic. CWaC and Shropshire) operate lower thresholds (30% and 10% respectively) which will make developing in Wrexham uncompetitive and unattractive to develop. The fact is that the evidence base used to rely upon and target 30 or 40% is a high-level viability assessment and additionally the LHMA does not support 40%. The LHMA already identifies that Wrexham Borough currently has a very high social housing stock (c. 23% of all units) and that to add to this would be sheer folly. The Council, therefore, has enough social stock. Yes, affordable housing is required but in a proportionate and viable basis and the Council must to recognise that using such a blunt edged tool will have counter intuitive consequences. Additionally, the Council has no record of achieving more than 25% anywhere before so how it can justify a step-up to a more challenging 30% or 40% is unclear. The Registered Housing (Association) providers have no ability to deliver on such a massive scale.

	This policy is unsustainable and undeliverable. It is pure fantasy that this level of affordable could be delivered by the market; the Council need to take a reality check because the RSL's will not be capable of delivering this volume and nor will open market housing developers be able to viably deliver this level. We are not suggesting here that no Affordable Housing can be provided on the promoted site, but that the level sought must be proportionate and robustly justified. A level reflecting the existing UDP requirement of 25% would seem to better reflect past delivery rates across Wrexham and likely to be more suitable for the site subject to viability testing including potential planning obligations and site-specific requirements. Consultation with relevant RPs should also be undertaken.
CF2 Provision of New Open Space	This policy seeks to have new public open space provided on all residential schemes over 10+ units at a rate of 0.25 ha per 50 dwellings (or 50 sqm per dwelling). For a site of 44 dwellings this would equate to an area of 2,200 sqm (0.22 ha). The masterplan shows that 4,100 sqm is being provided which equates to 93 sqm per dwelling; almost double the requirement.

- 2.43 In conclusion we feel that some of the emerging policies must change (sic. those relating to affordable housing and planning obligations) to make them sound. They will be challenged by the applicant at Plan Examination unless amended prior to the Submission Version being sent to Welsh Government.
- 2.44 However, in the meantime, we can conclude that the application proposals clearly comply with the existing UDP and the spirit of the emerging LDP.

Supplementary Planning Policy

2.45 There are some relevant approved/adopted non-statutory supplementary planning guidance documents that exist which have been considered by the applicant team in preparing this proposal; these comprise the following:

- SPG6 – Access to and use of Buildings
- SPG7 – Landscape and Development
- SPG10 – Public Open Space on New Housing Development
- SPG15 – Cycling
- SPG16 – Parking Standards
- SPG17 – Trees & Development
- SPG21 – Space Around Dwellings
- SPG24 – Designing Out Crime
- SPG27 – Developer Contributions to Schools
- SPG28 – Affordable Housing
- SPG30 – Design Guide for Developers & Architects when Designing Residential Development
- SPG31 – The Welsh Language & Welsh Communities
- SPG32 – Biodiversity & Development

2.46 Notwithstanding the fact that the applicant considers the proposal complies with each and every one of these documents the applicant must question what weight that can realistically be afforded them, not least because the relevant Planning Acts (2004 and 2012) are clear as to the Regulations under which such guidance is published and the fact is that unless a document has been through “examination” its weight is tempered and diluted. In view of this, very limited weight can be given to such documents.

National Planning Policy

2.47 The overarching policy framework in Wales comprises the **Wales Spatial Plan (WSP)** which provides the operational strategic framework for planning policy in the Principality, but is not spatially specific. WSP was updated in **July 2008**. Its 5 core aims and objectives are to:

- o Build sustainable communities;
- o Promote a sustainable economy;
- o Value the environment;
- o Achieve sustainable accessibility and;
- o Respect distinctiveness.

2.48 **Planning Policy Wales (PPW) (Edition 9 November 2016)** provides more detailed strategic guidance on planning policy and sets out land use policy, which is supplemented by the **Technical Advice Notes (TAN's)** and by draft Ministerial Interim Planning Policy Statements (MIPPS).

2.49 Chapter 7 to PPW is of particular importance as it deals with Economic Development; this is a rehearsal of what TAN 23 explores in more detail. Indeed, Para 7.2.2 states that : *“Local planning authorities are required to ensure that the economic benefits associated with a proposed development are understood and that these are given equal consideration with social and environmental issues in the decision-making process, and should recognise that there will be occasions when the economic benefits will outweigh social and environmental considerations”*.

2.50 PPW Para 7.6.1 goes further by stating : *“Local planning authorities should adopt a positive and constructive approach to applications for economic development. In determining applications for economic land uses authorities should take account of the likely economic benefits of the development based on robust evidence.”*

2.51 PPW cannot therefore be any clearer in its support for a proposal such as this.

- 2.52 The Welsh Government published “**Planning for Sustainability**” in **March 2012** as a Consultation Document. It sets out the “direction of travel” for emerging planning policy in Wales and effectively indicates that the WG may consider introducing a “presumption in favour of sustainable development” or at least greater emphasis upon sustainable development, where developments enhance the economic, social and environmental well-being of people and communities now and over the long term and that weight is given to national policy in determining individual applications where policy in adopted or approved development plans is outdated or superseded.
- 2.53 More recently the **Planning (Wales) Act** was published and granted royal assent in July 2015. It covered the following areas and makes statutory provision for (amongst others including a need to place greater emphasis on the Welsh Language) :
- o sustainable development to be at the core of all planning decisions and development planning policy
 - o the provision for a National Development Framework for Wales; the designation of strategic planning areas, the establishment of strategic planning panels and preparation of strategic development plans; on the status of development plans; with joint planning boards and their functions;
 - o standards of pre-application consultation by both applicants and the services to be provided by LPA's to facilitate engagement
 - o development management matters relating to application requirements, decision notices, duration of permissions
 - o revised appeal and enforcement procedures and costs awards
- 2.54 Secondary legislation is expected, but the general direction of travel appears that the emphasis will be to reflect the English system more closely with a view to supporting the delivery of new homes, jobs and infrastructure.
- 2.55 Procedural advice is then set out in Circulars and Ministerial clarification letters.
- 2.56 As such, these documents may be used as material planning considerations to the determination of individual planning applications.

2.57 The most relevant TAN's (and MTAN's) that are considered to be material in this instance comprise the following:

- TAN1 : Joint Housing Land Availability Studies (2015)
- TAN2 : Planning & Affordable Housing (2006)
- TAN5 : Nature Conservation & Planning (2009)
- TAN6 : Planning for Sustainable Rural Communities (2010)
- TAN12 : Design (2016)
- TAN15 : Development & Floodrisk (2004)
- TAN18 : Transport (2007)
- TAN22 : Sustainable Buildings (2010)
- TAN23 : Economic Development (2014)

2.58 We do not consider it appropriate to slavishly cover each of them in exacting detail but instead we will summarise the key and salient and pertinent points from each of them. As a general comment we consider that the proposals comply with them all.

	COMMENTARY
TAN1	This presented a marked "step change" in policy direction. This must also be read in the context of the Council's current development plan status. The Council released its last Joint Housing Land Availability Study (JHLAS 2014) in March 2015; this is a document that every Authority must publish on an annual basis and it identifies what housing land supply they consider is present. PPW (Para 9.2.3) states that it is a requirement of all Authorities to provide a 5 year housing land supply. However, the last published figures (JHLAS 2014) show that Wrexham had just 3.1 years supply (down from 3.4 years in 2013, 3.5 years in 2012, 3.9 years in 2011, 5.35 years in 2010); thus the trajectory is that it is decreasing every year and with no adopted LDP to identify future sources of supply the situation is forecast to only get worse. We are aware that more recent figures from 2016 suggest the supply has plummeted to just 1.14 years supply. TAN1 however provides even greater guidance and clarity and Paras 6.2. 8.1 and 8.2 are of particular pertinence; for they states that where a current study shows less than 5 years the need to increase supply (by approving more development) should be given considerable weight when dealing with planning applications provided that the development would otherwise comply with the development plan and national policy. However, where there is an expired UDP and/or no adopted LDP in place the Authority will effectively be considered not to have any supply (a zeroed position)

	This places Wrexham in a very difficult position, particularly since they have at least another 2 years before they expect their LDP to become adopted. This is set against a backdrop of their first LDP1 attempt failing and having to be withdrawn and already a two year slippage in their LDP2 programme from the original Delivery Agreement date. This is rather a woeful position to be in and a step change is needed if the position of being able to provide “deliverable” (i.e. available, free of constraints and viably developable) sites that might positively contribute to housing land supply can be arrested. PLEASE REFER to the following section for a more detailed assessment on the implications of the WG dis-application of Para 6.2.
TAN2	This scheme is for an open market development, but it does offer a significant level of new affordable housing (10 no. units) and the proposed type and mix of units illustrated reflects the known local affordable housing need as directed by Officers. The local target is 25% provision and we consider that this is achievable subject to viability (all other factors considered). Para 10.12 recognises that it is important that there is adequate housing provision in rural areas to meet the needs of local people and to contribute to the delivery of sustainable communities. Indeed, TAN2 states that Development Plans must support rural exception housing policies and it recognises that alone such sites cannot deliver affordable housing and as such Authorities are advised to allocated sufficient land either within or adjoining settlements. We have worked collaboratively with the Authority in understanding the need and this scheme seeks to deliver that heed which would otherwise not be met. Affordable Housing can be secured through Condition and/or S106 legal agreement and the applicant is happy to consider either.
TAN5	Protected species and habitats have been assessed and examined; with an extended Phase 1 Ecological Assessment undertaken. New areas of biodiversity are proposed and a “dark corridor” and buffer is identified along the eastern southern and western perimeters of the site for bats.
TAN6	Although mainly dealing with agricultural related development this TAN does seek to support development that will serve to enhance the future sustainability of rural communities through new residential opportunities. Para 3.1.2 states that : <i>Planning authorities should support the diversification of the rural economy as a way to provide local employment opportunities, increase local economic prosperity and minimise the need to travel for employment.</i>

	Section 6.2 discusses agricultural land quality; the Predictive Map suggests that the site comprises largely Grade 2. By default, any land release around Gresford would involve the loss of potential Grade 2 agricultural land and so it is just one issue amongst a host of others that can be used; notably we have shown that this site performs the best in terms of accessibility and sustainability when compared to alternative options. More importantly, this parcel is not conjoined to others and is not providing any productive use, so its loss will have negligible impacts.
TAN12	As Para 2.5 states : Good design is not inevitable. It requires a collaborative, creative, inclusive, process of problem solving and innovation – embracing sustainability, architecture, place making, public realm, landscape, and infrastructure. The design solution arrived at (as expressed in the DAS) and the Landscape Design statement demonstrates that TAN12 has been followed and has taken a sensitive and sympathetic approach and response to the local natural and built environment assets. Para 5.12.2 is particularly relevant and states that : <i>Large new employment buildings can often make a bold statement of their purpose. Recognising the functionality of business premises is important to ensure they contribute to the economic success of the occupier. However, robust design, high quality materials, flexibility of exterior and interior layout and appropriate landscape treatment such as earth form or planting, can help to integrate new business premises into their surroundings, minimise the need to artificially cool buildings and allow for easier conversion by successive occupiers. Service and utility features, exposed and imaginatively detailed, may in many cases provide elements of interest in otherwise plain facades. The need to consider the building and landscape maintenance processes once the development is completed is also essential to ensure that the development remains integrated.</i> The applicant considers that this guidance has been met and issues of scale, appearance and materials have all been successfully resolved.
TAN15	The site does lie within a Flood Zone A (low risk category). Nonetheless an FCA has been undertaken along with Infiltration testing to prove that a sustainable method of surface water drainage can be achieved. Connections to the mains (foul) drainage facility is possible.
TAN18	A Transport Statement has been submitted. The highway access has been proven and agreed with the Highway Authority and the layout has been proofed to accept service vehicles and the quantum of trips rates generated by the scheme. We believe this shows that the site is located in a highly sustainable location and accessible.

	The package of pedestrian enhancements (linkages, connections and footway provision providing safer routes and traffic calming measures) are all significant benefits and improvements to the local area that this scheme can deliver.
TAN22	The standard Code will be met and building Regulations will serve to ensure buildings meet current standards of sustainability.
TAN23	This is of significant material weight given that PPW defines economic development broadly so that it can include any form of development that generates wealth, jobs and income (including residential). It follows therefore, that the economic impact of these proposals must be given serious weight; the nature and extent of the benefits are provided in the summary section to this statement. Para 1.15 recognises that economic land uses include construction and include house building. And the PPW references on a number of occasions the need to align housing and jobs and the delivery of meeting affordable housing need in a sustainable travel to work area. The most relevant and pertinent Paragraphs in TAN23 comprise the following: Para 1.2.1 <i>As a consequence it is essential that the planning system recognises, and gives due weight to, the economic benefits associated with new development.</i> Para 1.2.2 <i>PPW advises that planning for economic land uses should aim to provide the land that the market requires, unless there are good reasons to the contrary</i> Para 1.2.5 <i>Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development</i> Key factors in determining the weight and benefits of supporting schemes will be to ask the questions (posed under Section 2) of what are the alternatives, how many jobs will be directly provided and what other special merit might exist. This scheme will deliver and generate many construction and supply chain jobs and the new housing will serve to support enhanced local services and facilities once occupied. Section 3 discusses supporting strong rural economies; recognising that sustainable development is essential to building strong and vibrant rural economic communities; and it is important in aligning existing and future homes and jobs.

2.59 In conclusion, having assessed the relevant national planning policy guidance, it is our contention that the proposed development is supported, fully compliant and is endorsed by local and national planning policy.

TAN 1 Para 6.2 assessment

2.60 The WG issued a Consultation Paper on this topic on 10 May 2018, requesting feedback by 21 June 2018. A Ministerial letter was then published on 18 July 2018 which confirmed that having reviewed the consultation feedback it would proceed in dis-applying Para 6.2 of TAN 1 with immediate effect but with no end date defined.

2.61 In the light of this, we felt that it would be helpful and necessary for us to consider its implications and so have duly considered its impact upon the proposal site and set out our response to this below. In summary, we consider it makes very little difference and our position is set out below.

National Policy

2.62 TAN1 is mainly about how Authorities must show they have a rolling 5-year housing land supply and provides guidance on the methodology in calculating this. Para 2.2 states that:

“The Welsh Government considers that having complete coverage of adopted LDPs across Wales is critical in ensuring that the homes which are needed are delivered. Consequently, housing land availability needs to be soundly based on meeting the housing requirements identified by local planning authorities, which requires an adopted LDP to be in place”.

2.63 Removing Para 6.2 does not mean that Authorities can take their foot off the gas and slow-down their plan process; it means that the emphasis is still on having an adopted LDP; the critical need to deliver housing has not suddenly disappeared; the need to have an adopted plan remains an urgent action.

2.64 Para 6.2 states that:

“The housing land supply figure should also be treated as a material consideration in determining planning applications for housing. Where the Technical Advice Note 1: Joint Housing Land Availability Studies current study shows a land supply below the 5-year requirement or where the local planning authority has been unable to undertake a study (see 8.2 below), the need to increase supply should be given considerable weight when dealing with planning applications provided that the development would otherwise comply with development plan and national planning policies.”

2.65 So, if an Authority cannot demonstrate a 5-year supply (as is the case here) Para 6.2 places a degree of pressure upon them to approve applications. However, such applications must still comply with the development plan and National policies in all other respects; it simply means that not having a 5-year supply adds another element of weight in favour of such proposals.

2.66 Para 6.2 of TAN1 is just one paragraph and must not be read in isolation and taken out of context from a whole swathe of arguably more important policy guidance such as TAN 2 (delivering affordable housing) and TAN 23 (in delivering economic development) and, in particular, PPW9 (Chapter 4 on Sustainability and the presumption in favour of sustainable development : Para 4.2.2) and its Chapter 2 on Local Development Plans; in states that :

***2.14.2** Where an LDP is in preparation, questions of prematurity may arise. Refusing planning permission on grounds of prematurity will not usually be justified except in cases where a development proposal goes to the heart of a plan and is individually or cumulatively so significant, that to grant permission would predetermine decisions about the scale, location or phasing of new development which ought properly to be taken in the LDP context. Where there is a phasing policy in the plan that is critical to the plan structure there may be circumstances in which it is necessary to refuse planning permission on grounds of prematurity if the policy is to have effect. The stage which a plan has reached will also be an important factor and a refusal on prematurity grounds will seldom be justified where a plan is at the pre-deposit plan preparation stage, with no early prospect of reaching deposit, because of the lengthy delay which this would impose in determining the future use of the land in question.*

***2.14.3** Whether planning permission should be refused on grounds of prematurity requires careful judgement and the local planning authority will need to indicate clearly how the grant of permission for the development concerned would prejudice the outcome of the LDP process.*

2.67 The highlighted text above is incredibly important and we believe in this instance the Authority must be careful not to deviate from this key guidance; whereby significant material weight must be attributed to such policies.

2.68 Furthermore, one cannot forget that it is Chapter 9 of PPW9 which is the main source of Housing guidance not Para 6.2 of TAN1.

WG direction of travel

- 2.69 The Consultation Paper of 10 May 2018 suggested that the removal of Para 6.2 could alleviate some of the pressures upon LPA's when dealing with "speculative development" and give them greater capacity to focus on LDP preparation and review.
- 2.70 It also clearly stated that the determination of applications should continue to be made in accordance with the development plan and national policies and that the principle of sustainable development and creation of cohesive communities will continue to be applicable.
- 2.71 Indeed, the 18 July 2018 letter reinforces the need to increase the delivery of new homes in sustainable locations and invites evidence to explore ways in which the planning system can do this.
- 2.72 We consider that the (temporary) dis-application of Para 6.2 is therefore unsound, challengeable and counter-intuitive and will actually serve to reduce house building in sustainable locations and harm the economy of Wales by deterring investment in what is still a very fragile and increasingly challenging market place.
- 2.73 The consultation on the proposed dis-application of paragraph 6.2 of TAN 1 was related to a forthcoming wide-ranging review of the delivery of housing through the planning system. This review is being undertaken in response to the current housing land supply position and the directly related situation regarding the delivery of LDP housing requirements, with the aim of ensuring the most appropriate housing sites are brought forward as part of a systematic and rigorous LDP process.
- 2.74 The dis-application of paragraph 6.2 of TAN 1, having formally come into effect on 18 July 2018, therefore coincided with the Welsh Ministers issuing a "call for evidence" to the Heads of Planning in Wales, which forms an initial part of the wider review of housing delivery. It is a temporary arrangement, remaining in force for the duration of the review, but there is no timetable setting out the programme for the wider review and we fear that this could extend for a period that could prove disastrous. Already many housebuilders are "exiting" Wales and building is at an all-time low and there is no sign of this doing anything other than dissuading investment and delivery.

- 2.75 Moreover, the Welsh Minister's "Summary of Responses" document, published subsequent to the consultation on the proposed dis-application of paragraph 6.2 of TAN 1 earlier in the Summer of 2018, speaks volumes in its statistical content. Substantive responses were received from the business community (largely made up of housebuilders and planning consultants) with a resounding 93% opposition to the proposed temporary dis-application of paragraph 6.2 of TAN 1. The business sector argued that TAN 1, and in particular paragraph 6.2, provides necessary and appropriate guidance to inform the decision-maker when determining planning applications where housing land supply is less than 5 years. Businesses also argued that the qualification in paragraph 6.2 regarding compliance with development plan and national policies ensured that developments would only be allowed where they were in sustainable locations. Evidence regarding planning applications and appeal decisions was cited to support this assertion. Yet for some reason these consultations and evidence has been cast aside for what can only be described as some misguided error.

Local Development Plan Policy Position

- 2.76 The Authority have an approved LDP Delivery Agreement and we do not believe that there is any evidence that proves the Authority is spending so much time on "5-year supply challenger" housing applications that it is removing their ability to deliver their LDP.
- 2.77 We have every confidence in the Authority delivering their LDP and ability to meet their agreed programme of adoption regardless of whether Para 6.2 exists or not.
- 2.78 The fact that the Authority is unable to demonstrate a 5-year housing supply will not go away because Para 6.2 has been removed.
- 2.79 The suggestion made by WG is that no longer can "considerable weight" be applied to not having a 5-year housing land supply; however, the Ministerial letter clearly confirms that it is up to decision makers (be these Officers, Members or the Planning Inspectorate) what amount of weight is afforded and in our opinion, we would suggest that "substantial weight" can and should be still be applied.
- 2.80 However, as we have suggested above the temporary dis-application of Para 6.2 is not, in any event, the sole determining factor; it is just one area.

Response pertaining to Para 6.2 and the Proposal site

- 2.81 **Firstly**, this proposal is not speculative. Indeed, Officers (both Development Management and Planning Policy) have been positive in their encouragement to see this site come forward to help them with their 5-year housing land supply. The site has been submitted in the knowledge that the housebuilding market is keen to develop here, and the applicants' intent of its seriousness is demonstrated by the submission of this proposal as a Detailed planning application. Moreover, the Council's own evidence base has unequivocally recommended that the site be removed from the Green Barrier and any special landscape area policy designation.
- 2.82 **Secondly**, the applicants are full aware of its location outside of the existing UDP settlement boundary for Gresford, but the site is located in a highly sustainable location and meets all the criteria for placemaking, accessibility and sustainability tests.
- 2.83 The emerging LDP has not identified any sites in Gresford despite it being identified as a Tier 2 settlement. The applicant will continue to promote it through the emerging policy framework process in order to secure an allocation, which will include appearing before an Examination and Inspector if this is deemed necessary.
- 2.84 **Thirdly**, it has been demonstrated that all technical aspects of the site present no conflicts or constraint to this site being brought forward for development and that it is technically deliverable in all respects.
- 2.85 **Fourthly**, we have proven that the site complies with the existing UDP, the emerging LDP and all other material aspects of National guidance (PPW and TAN's) as set out above.
- 2.86 **Fifthly**, this site, if assessed as part of a formal JHLAS (as determined by Para 4.4.3 of TAN 1) is, we consider, genuinely available within a 5-year period in that:
- The necessary infrastructure is available; consultation with the appropriate public and private statutory undertakers and infrastructure providers confirms this;
 - There are no legal or ownership problems needing to be resolved; the site is in single ownership and the landowners are willing; the land is free from

any possible encumbrances, no easements or covenants exist and there are no tenancies needing to be extinguished; it is free of any such constraint;

- The owners are keen to dispose of the site to Gower Homes; illustrating that there is little doubt it will be sold and brought forward for development.

2.87 **Sixthly**, the applicant is fully aware of the recent decision to dis-apply Para 6.2 of TAN1 and wishes to confirm that they are simply looking to demonstrate that the site is deliverable. They believe that this sites' sustainability credentials, the potential community benefits package and the fact it offers a natural and logical extension to the settlement, ought to mean it being a very strong candidate for release and identification for housing in the forthcoming LDP and that substantial weight must be attributed to this regardless of any Para 6.2 dis-application.

2.88 **Seventhly**, we would like to add that the fact remains that notwithstanding any dis-application the need to deliver new homes will not diminish or disappear. The dis-application will simply make the delivery of new homes increasingly more challenging and sustainable sites such as this will come under increasing pressure to deliver, which may result in Local Planning Authorities having to release even more sites to fulfil their housing need supply within an even more compressed plan period timeframe.

2.89 In all other respects, the site has been proven to be deliverable, suitable, available and viable.

Summary

2.90 In the opinion of the applicant:

- Dis-applying Para 6.2 will be counter-intuitive and harm the delivery of affordable housing, undermine economic growth and development and ultimately not do anything to speed up the delivery of sustainable development and new housing.
- There is no evidence that Para 6.2 has weakened the ability of Authorities to deliver an adopted LDP and no evidence that its dis-application will lead to them resourcing and accelerating their LDP programme.
- Reducing and/or removing and/or placing additional obstacles in the path of developers will not incentivise investment but deter it and it will

weaken the longer term needs of Authorities who are reliant upon income from non-allocated windfall sites (be this through application fee income, council tax, infrastructure investment, jobs, etc) as it will place key projects on hold and many cannot afford to play catch up and try to deliver all their housing needs within what might remain of an LDP plan period ... such compression will have a negative effect.

- The pent-up demand and accumulated backlog will simply increase and this will have a devastating impact upon not just the delivery of open market housing, but simply increase the pressure upon the Authorities' obligation to deliver affordable tenures.
- The lack of a 5-year housing land supply will remain a "material consideration" and as this is a point of law and not policy, no amount of "playing around" with "emphasis" will dilute the fact the nation is struggling to address a very real and immediate housing crisis.
- There is an over-riding need to increase supply and the applicant is not convinced that this will or can be met by the emerging plans' housing land supply.
- The dis-application will not do anything to support "sustainable" objectives and will not address the root cause of any issues relating to the inability of many Authorities to have an adopted and up-to-date LDP and thus a rolling 5-year housing land supply because that problem is down to under-resourcing, under-funding and poor management of Planning Departments.
- The development industry already pays for its service but should not be penalised and impeded from delivering jobs and new homes and nor should the good people of Wales suffer by default.

2.91 Notwithstanding, the removal of Para 6.2 the proposal site meets all the tests of National Policy and the principles of sustainable development and creation of cohesive communities.

3.0 SUMMARY BENEFITS IN SUPPORT

- 3.1 This statement has assessed the suitability of the application site for the proposed development and having concluded that the proposal is inherently compliant with Local and National policy it is my opinion that this proposal must be approved.
- 3.2 I have then sought to consider whether there happen to be any other material considerations that might balance out any reason for approval and actually outweigh its compliance with policy; to such an extent so as to make the proposal unacceptable.
- 3.3 My conclusion is that there is nothing to prejudice a positive determination and indeed it is my opinion that suggests the exact opposite. What has been revealed by the site planning history, technical studies and pre-application consultation demonstrates that this proposal should be supported and encouraged to come forward.
- 3.4 The principle of developing Green Barrier (open countryside) for residential use is not something that is generally supported unless very special circumstances can be demonstrated, however, in this instance we consider that we have presented a strong justification for this parcel to be developed for the purposes proposed by this application, which is supported by the national planning policy guidance. The fact that the Authorities own LDP evidence base (Green Wedge Review) has determined that the site be released from this designation adds even greater compelling weight to the fact this proposal should be approved.
- 3.5 Furthermore, the pre-application discussions held with the Council since July 2017 have confirmed our belief that the proposal would be welcomed and was likely to be acceptable in meeting planning policy requirements. Such discussions have proven most useful in establishing the framework and direction of the proposals and we would like to thank the people involved in this process for this co-operative and helpful stance. We therefore feel that the proposals suitably reflect the intent inferred and the advice and guidance provided.

- 3.6 The application is submitted in order to facilitate the implementation of the proposals and, subject to this application being approved during Q1 2019, this will pave the way for commencement of development as early as Q3 2019 and potential completion within 2 years of that date.
- 3.7 The site is deliverable. The owners have entered into a legal agreement with the developer Gower Homes to purchase the site on grant of planning. Gower have spent significant resources on the planning process and the commitment to delivering the site is reflected in the fact this is a Detailed planning application. In this age of DMO consultation the resources needed to promote a site do not come cheaply and is a significant investment for any applicant. This is a very serious and real development and Gower Homes are committed to delivering and achieving a permission. It is their hope that they will obtain the support of Officers and Members and be granted permission without having to go to appeal, but if they have to they will resource an appeal. This site represents a significant investment for them and they are committed to delivering new homes and securing and maintaining local jobs locally in Wrexham Borough.
- 3.8 We believe this statement, together with the accompanying and supporting documentation and associated plans demonstrate this and satisfactorily illustrate all the points that need to be considered. Our case, in demonstrating that this development proposal meets the exceptional circumstances test as set out in PPW, is grounded in the following:
- the Authority cannot present any case for a 5-year housing land supply and TAN1 is still of significant material weight; despite the dis-application of Para 6.2
 - that the Green Barrier is no longer applicable (in the light of the Council's own Green Wedge Review) yet, even if it did still apply the site does not meet any of the 4 purposes of including and retaining the land within the Green Barrier
 - that the Council's commissioned SLA study has found that the SLA policy designation is no longer sound or relevant
 - that there are no acceptable or deliverable alternatives and indeed we have shown this site outperforms all other possible alternative sites and whilst smaller sites may exist, none of them will make any meaningful contribution to delivering Affordable Housing or other community infrastructure
 - that our case is supported through all technical, landscape and design evidence presented in support of this application
 - there are a range of significant benefits (as set out below)

- 3.9 These cumulatively present a compelling case as to why this scheme should be supported and granted planning permission and moreover the benefits (as set out below) present a compelling case as to why this scheme should be supported and granted planning permission.
- 3.10 The development will achieve sustainable development in accordance with the emerging policy emphasis upon providing a series of **economic, social and environmental net gains**.
- 3.11 We believe the development will achieve sustainable development in accordance with an emphasis on generating significant and mutually supportive economic, social and environmental benefits which collectively constitute sustainable development; this being a key concept and ambition being driven by the placemaking agenda promoted by Planning Policy Wales.
- 3.12 A range of **considerable community and public benefits** are provided, which cumulatively present a compelling case as to why this scheme should be supported and granted planning permission. These benefits will go beyond simply delivering new housing and can be summarised as **scheme deliverables** with **roles** in the following manner:

ECONOMIC DELIVERABLES & ROLE

- The total project contract value for this project is in the region of **£7.5 M** and this will help to secure existing construction jobs based locally and create new ones.
- In what are still tough economic times; skilled jobs in the locality that will help maintain employment and provide and contribute towards the ongoing economic investment in the locality is a significant bonus.
- It is estimated that the development would need a constant **20 direct operative jobs** a day to sustain a 2-year construction programme with another **25 supply chain jobs** indirectly supported.
- Significant **local spend and economic output** during the construction period of the development will represent a big boost to existing businesses. Indeed, construction industry bodies have found that for every £1 spent in the construction industry this generates £3 in the local economy so with a £7.5 M project this is an investment worth up to **£22.5 M** over a 2-year build period; spend that will lead to new services being offered locally.
- Post-completion, the **spending power of another 44 households** into the local economy can also be expected to be significant; not only in first occupation expenditure (to make a house “feel like a home”) of around

£343,200 (based upon £7,800/home) but ongoing local expenditure in sustaining local services and facilities beyond just the construction cycle to the tune of **£1.21 M** per annum (based upon the average annual household expenditure of £27,502); this will serve to sustain around another **15 local jobs**.

- The completed development will also generate **Council Tax revenue** for the Authority and with an average £1,923 bill per Band E household this will generate up to **£84,612 per annum** in supporting and enhancing existing public services.
- With a local **Community Council precept** seeing new income being devoted to local initiatives to address any local expenditure needs at grass roots.
- This proposal seeks to deliver jobs, economic growth and prosperity into the local economy.

SOCIAL DELIVERABLES & ROLE

- Far from being an “exclusive executive” housing estate the proposal involves a mixed range of size and tenure of new housing including 25% (11 no) affordable dwellings and **36% of all dwellings are small 1, 2 and 3 bed properties**.
- This scheme will deliver a positive number and meaningful contribution of **11 no. affordable housing** units that are specifically targeted at “**starter home, younger generation and families**” thereby meeting the known latent need and demand in this locality through the delivery of **25% affordable housing**. This will be the first site to deliver affordable housing in two generations.
- Provision of new **Public Open Space (POS)** on site that exceeds standards by almost double the required amount at 4,100 sqm; therefore, providing a local resource not just for future residents but existing ones.
- Where there is a proven need to make a **commuted sum payment towards any Educational Supplement** this will be made.
- Providing far safer **pedestrian routes** and **connections** into the village core; ensuring that car borne traffic is not only disaggregated from those more vulnerable users within the site but “calming measures” are introduced along Vicarage Lane; this involves **providing new pedestrian facilities along 266 metres of Vicarage Lane from the site access to Chester Road so out of 342 metres just 76 metres will remain without a refuge/footway (representing 78% safe connectivity) where there presently isn’t any**.

- The new housing will offer the opportunity to secure the future of local Primary and Secondary schools; housing brings families, retains families; thus, providing future community sustainability.
- Providing access for all sectors of the community, particularly those with mobility difficulties – the design incorporates **DDA compliant** grade access into the buildings and across the sites.
- Accessible by foot/cycling to local amenities and facilities and taking advantage of public transport interfaces (bus routes); thus, promoting sustainable travel choices and **reducing the need to travel** using private modes of transport.
- Providing **new** safe, secure dedicated **off-street resident parking for existing residents**.
- The development of the site for a use that meets Highway safety needs and will provide for sufficient off-street parking spaces, turning and access for all refuse, emergency and delivery vehicles.

ENVIRONMENTAL DELIVERABLES & ROLE

- Resulting in the **comprehensive development** of the site with a sympathetic and sensitive design taking account of the neighbouring rural and urban grain and its landscape setting and character.
- Delivering a mix and range of housing types and sizes in a way that reflects the existing urban grain of the settlement and at density that is appropriate and delivers “**place-making**”.
- The design has taken account and respect of its landscape setting, ecological habitat and tree / hedgerow infrastructure and sought to integrate these features and ensure maximum retention, mitigation and enhancement is enabled through new reinforced planting, buffer, dark corridor and biodiversity opportunities. The site is enclosed by natural features and the design layout and landscape treatment proposed will safeguard the open countryside.
- Retaining **connective, permeable and safe pedestrian** links/routes into and adjacent to the development site; thus, maintaining **public access** throughout the site and to existing footpath No 12.
- The proposed layout and detail of the scheme in design terms offers the highest **quality design solution** that could be expected for this site and the applicant has invested heavily in this to get it right and it will serve to significantly enhance the design quality of the area; thus benefiting the special character and appearance of the site in its rural / urban fringe setting.

- 3.13 The development proposals therefore generate significant and mutually supportive economic, social and environmental benefits and gains which collectively constitute sustainable development in line with PPW and must not be underestimated.
- 3.14 We consider these scheme deliverables should be afforded **full weight as material planning considerations**. They are significant enough to justify and demonstrate that the proposals are acceptable and would serve to outweigh any perceived or apparent concerns (or harms) that this proposal could be considered to have upon the locality, its open countryside and (current) Green Barrier and SLA designation.
- 3.15 This proposal has also demonstrated that it is in full accordance and wholly compliant with all national and local planning policy and associated best practice guidance governing development proposals.
- 3.16 We submit that considerable and significant weight should be afforded to the Policy documents referred to as material considerations in support of the proposals.
- 3.17 This is a scheme of high quality and advanced sustainability; which strategically fits with planning policy and other material planning considerations.
- 3.18 On this basis, and from the assessment of the relevant material planning considerations, we genuinely consider that the proposed development should be granted **Detailed Planning Permission**.
- 3.19 Any conditions that are to be attached should follow the guidance set out in Welsh Government Planning Circular 16/2014 whereby any planning conditions must meet the following six tests:
- *Necessary;*
 - *Relevant to planning;*
 - *Relevant to the development to be permitted;*
 - *Enforceable;*
 - *Precise; and*
 - *Reasonable in all other respects.*

- 3.20 We would request that in the event a draft decision notice and conditions are prepared, that we are fully involved in the process in order to ensure that the wording of such conditions meet the above tests and enable the swift commencement of development.
- 3.21 **This application is technically robust, and it has been demonstrated that there are few, if any, negative impacts that would result. The overall planning balance is weighted strongly in favour of granting permission as per Section 38(6) of the Planning & Compulsory Purchase Act 2004. The proposals must be supported and permission approved without any delay in accordance with the Framework because we have demonstrated that no adverse impacts are evident in impeding such a positive determination being reached and any impacts which might be judged to occur would have to significantly and demonstrably outweigh the benefits when assessed against policies of the Framework taken as a whole and in our opinion none exist.**
- 3.22 **Accordingly, we commend these proposals to the Council.**

APPENDIX A

Pre-application Correspondence

From: [Mared Rees](#)
To: [Justin Paul](#)
Cc: [Michael Forgrave](#); [Lee Kendall](#); [Harry Reece](#); [Abigail Owen](#)
Subject: RE: Gower Homes - gresford
Date: Wednesday, February 14, 2018 3:14:48 PM
Attachments: [image001.png](#)
[image003.png](#)

Justin

I don't consider a further meeting is necessary in this instance, as all of the relevant points have been previously discussed. I am happy for you to send me a list of the documents you intend on submitting and I will let you know if you are missing anything.

Thanks

Mared

From: Justin Paul [mailto:Justin@j10planning.com]
Sent: 13 February 2018 16:29
To: Mared Rees
Cc: Michael Forgrave; Lee Kendall; Harry Reece; Abigail Owen
Subject: Gower Homes - gresford

Hello Mared

The team is just finalising the design layout and highway documents and prior to us embarking upon the formal pre-application publicity process we would like to pop in to see you to run through the draft submission. We will, in advance of any meeting look to send you the key items and hopefully will be in a position to do this sometime next week.

With this in mind could we diarise a session with you w/c 26Feb ?

Please let me know your availability I look forward to hearing from you.

Kind regards

Justin

Justin Paul BA BTP MRTPI

MANAGING PARTNER

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Ewch i weld - mi fedrwch chi dalu, rhoi gwybod, gwneud cais, dweud eich dweud, a dod o hyd i wybodaeth ar-lein yn www.wreccsam.gov.uk. Arbedwch bapur - meddylwch cyn argraffu!

From: [Mared Rees](#)
To: [Abigail Owen](#)
Cc: [Harry Reece](#); [Michael Forgrave](#); [Justin Paul](#)
Subject: RE: Gower Homes, Vicarage Lane, Gresford
Date: Wednesday, January 17, 2018 12:05:54 PM
Attachments: [image002.png](#)

Abby

Thanks for sending these through.

Beaumaris Plot

The side elevation serving the entrance property into the site has a blank façade at the moment and appears as an obvious side elevation when viewed from Vicarage Lane. Ideally, this house type needs to be re-looked at so that the house doesn't appear as an obvious gable end and more windows are inserted, which would provide more interest.

Alternatively, this part of the dwelling which faces Vicarage Lane could even be made the principal elevation so that it achieves a strong presence given it is the main dwelling viewed when travelling up and down the road. A dual aspect frontage, which perhaps could incorporate an entrance door on both elevations, I also think, would help to achieve this.

Side Boundary

-

I like option 1 for the side boundary, with the incorporation of the wall and hedgerow.

Any queries, please get in touch.

Thanks

Mared

From: Abigail Owen [mailto:abigail.owen@basearchitecture.co.uk]
Sent: 15 January 2018 15:05
To: Mared Rees
Cc: Harry Reece; Michael Forgrave; Justin Paul
Subject: Gower Homes, Vicarage Lane, Gresford

This email's attachments were cleaned of potential threats by Wrexham Council's Security Gateway.
Click [here](#) if the original attachments are required (justification needed).

Dear Mared, I hope you are well

Following our discussion earlier in the month please find attached proposed site entrance options, that explore the overall appearance of the vehicle & pedestrian approach off Vicarage Lane,

boundary treatments to plots and design of dwelling frontages.

Within the 3D views attached there are 3 options with the same view per page to allow comparison.

Options explore the following points:

Option 01:

- Partial removal of existing hedge (rear garden plot 17)
- Featured grassed area & soft landscaping on entry to site
- Footpaths into site along access road edge
- Side path to plot 17 along featured grassed area
- High level curved brick wall to plot 17
- Pillar entrance (set further into site from option 02)
- Pathways leading to plots 1 – 8 off new footpath with either dwarf wall or railings & pedestrian gate with paved path to front door

Option 02:

- Footpaths into site along edge closest to dwellings with featured grassed areas along access road edge
- Pillar entrance with low level curved featured wall incorporating possible signage
- Featured grassed area & soft landscaping on entry to site
- Increased removal of existing hedge & extending footpath along lane
- High level curved brick wall to plot 17 with low level railings along side path to plot

Option 03:

- Side path to plot 17 along driveway – edge of dwelling along featured grassed area
- Plot 17 to incorporate a featured bay window on side elevation fronting entrance
- Existing hedge largely retained
- Low level wall and timber fencing to boundary of plot 17

Please let me know if you have any questions regarding the above.

Look forward to your comments and your preferred design approach to the site.

Kind Regards

Abby

Abigail Owen

Architect



Main Office (01244) 569008

Mobile (07811) 414444

Website www.basearchitecture.co.uk

Brochure [LINK](#)

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Ewch i weld - mi fedrwch chi dalu, rhoi gwybod, gwneud cais, dweud eich dweud, a dod o hyd i wybodaeth ar-lein yn www.wreccsam.gov.uk. Arbedwch bapur - meddylwch cyn argraffu!

Mae'r neges e-bost hon ac unrhyw atodiadau wedi eu bwriadu ar gyfer yr unigolyn neu'r sefydliad y?i cyfeirir atynt yn unig. Am yr amodau llawn yngl? n â chynnwys a defnyddio'r neges e-bost hon, ac unrhyw atodiadau, cyfeiriwch at www.wreccsam.gov.uk/top_navigation/disclaimersw.htm

We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.

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From: [Mared Rees](#)
To: [Justin Paul](#)
Cc: [Michael Forgrave](#)
Subject: RE: Gower - Vicarage Lane, Gresford
Date: Friday, December 15, 2017 11:38:09 AM
Attachments: [image001.png](#)
[image003.png](#)

Hi Justin

No comments.

Thanks

Mared

From: Justin Paul [mailto:Justin@j10planning.com]
Sent: 14 December 2017 14:54
To: Mared Rees
Cc: Michael Forgrave
Subject: Gower - Vicarage Lane, Gresford

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Click [here](#) if the original attachments are required (justification needed).

Hello Mared

Further to our meeting on 15 November 2017, I have prepared some meeting notes and would be grateful if you could kindly take a look to ensure I have not missed anything ?

I look forward to hearing from you.

Kind regards

Justin

Justin Paul BA BTP MRTPI
MANAGING PARTNER

J10 Planning Ltd

1-3 Upper Eastgate Row, Eastgate Row North, Chester, CH1 1LQ

01244 349400 // 07971 446630 // justin@j10planning.com

Company Reg. No. 6000409 VAT Reg. No. 815630835



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E-mail justin@j10planning.com
Home Page www.j10planning.com



Meeting Notes

Date : 15 November 2017

Site : land at Vicarage Lane, Gresford, Wrexham

Venue : Wrexham Council, Lord Street Offices, Wrexham

Attendees :

- o Mared Rees : WCBC : Planning DC
 - o Phil Palmer : Wrexham CBC : Highways
 - o Justin Paul : J10 Planning
 - o Michael Forgrave : Gower Homes
 - o Harry Reece : Base Architects
 - o Abigail Owen : Base Architects
 - o Danny Jones : Curtins
-

INTRODUCTION

This followed the last meeting on 1 August 2017 and the pre-app letter issued by the Council dated 11 August 2017.

UPDATE

Ecology : no badger setts, no ponds within 250 metres; 4 no. ponds within 500 metres and all assessed as scoring very low GCN suitability. Low level of bat activity.

Drainage : Flood Zone 1 so low level risk. Infiltration believed to be good (no pooling and good gravel based sub-surface. Foul pumping station will be required and connection to mains. An FRA and Drainage Strategy will be prepared.

Agricultural : no land quality survey undertaken, given Matthew Philips previous advice that such a small loss was low on the scale of things as any development on the fringes of settlements would lead to a similar loss.

Minerals : 100 metre buffer zone would effectively rule out any prior extraction.

Trees : a revised TCP has been undertaken and draft AIA completed.

Landscape : an LVIA has been undertaken and concludes the development of the site would lead to low impact visually, given containment of site and location.

MR recommended that both (agricultural and minerals) items be briefly assessed and weighted in the planning balance; they would then be considered by Officers but are not the determinant factors in the overall planning balance. She stated that design and highways are two principal issues remaining.

DESIGN

PROW Officer (Sean Hanratty) would like to see the footpath link widened to between 2 and 3 metres.

PP asked whether there was any scope for a footway behind the hedgerow however, HR suggested this is not preferable and would result in future security/amenity issues. Moreover, a pedestrian link is being created internally from the footpath through the site.

Unit 16 needs attention because of the tree RPA.

POS exceeds standards.

Pumping station located in least sensitive and visually intrusive position and can be screened.

Village green feel is retained

Unit 25 needs to be re-configured.

Views/Perspectives were discussed and it was agreed that artist impression type imagery would be best and 3 key views agreed:

- View into the site off Vicarage Lane
- View within the site and of the village green
- Axonometric aerial view of the site

Aspect of Units 8, 10 and 17 _ avoid have blank gables ends on show.

Boundary treatments of units 1 to 8 : preference for dwarf walls with a pedestrian gate and paved path to front door from the new footway.

HIGHWAYS

Adequate parking on driveways are being provided; integral garaging is being avoided.

11 no. spaces are being allocated for local residents overspill parking ... **PP** suggested they were nice to offer but questioned whether they would be taken up.

Visibility splays accord with speed records; although PP suggested car lengths need to include bonnets.

PP stated that tracking for 11.2 metre refuse collection wagons needs to be accommodated as the max. distance for reversing is 12 metres.

PP would like to see medium sized turning head on small cul-de-sacs/private drives and roadways need to be 4,8 metres width.

PP was happy to see the new footway (in front of Units 1 to 8 and asked whether this could be continued to left hand side of main access into the site next to Unit 17; thereby creating more of a feature entrance; this might also avoid future Local Authority maintenance issues associated with verge-way being created.

PP suggested that articulated tankers already struggle to turn into Vicarage Lane and a new footway at the junction would make it even more tricky. More design work was needed to prove that this was not a problem and would not impede access further for farm related service vehicles.

PP suggested that the lack of a full-length footway along Vicarage Lane was a concern for him as it was contrary to TAN 18 advice.

PP could not equate the benefits being offered (footway where it can be delivered, off-street resident parking, traffic calming, potential TRO for pedestrian refuge) with the lack of a full-length footway despite the site being located within perhaps the most sustainably accessible location on the edge of the village and the fact that any site coming forward in Gresford would face a similar challenge due to lack of footpaths.

PP suggested a TRO would face opposition from the farm (Willis's) and local residents.

NEXT STEPS

JP stated that additional highway work would be done and the design refined prior to the formal pre-application DMO process being commenced.

From: [Maureen Lee](#)
To: [Justin Paul](#)
Subject: RE: Gower Homes : Vicarage Lane, Gresford
Date: Monday, October 23, 2017 1:40:10 PM
Attachments: [image001.png](#)
[image003.png](#)

Dear Justin,

Apologies for not replying sooner.

Please find below the updated waiting list figures for Gresford/Marford and the surrounding areas.

These are figures for our Social Housing requirements and I have requested details of the demand from our Affordable Housing Register for LCHO and Intermediate Housing from Grwp Cynefin who manage this register for us.

Main Area	Area	1	2	3	4	5	Grand Total
Wrexham Central	Bangor On Dee	21	18	10	1		50
	Bettisfield	5	5	4	2		16
	Bronington	8	12	4	4		28
	Erbistock & Eyton	12		13	4		29
	Gresford & Marford	148	78	42	3		271
	Hanmer	11	9	3	2		25
	Hermitage	173	83	42	9		307
	Holt	62	45	17	8		132
	Meifod Place	89	31	16	5		141
	Overton	44	28	17	2		91
	Penley	25	21	8	5		59
	Pentre Maelor- Isycoed	9	5	12	2	1	29
	Rhostyllen	136	76	40	7		259
	Rossett	117	66	34	4		221
	Tallarn Green - Iscoed	4	5	3	2		14
	Worthenbury	2	3				5

Kind regards

Maureen

Maureen Lee, FdSc, CIHCM, AMinstILM

Housing Development Project Manager \ Rheolwr Prosiectau Datblygu Tai

 **Tel 01978 315574**

 **Wrexham County Borough Council, Housing and Economy, Ruthin Road, Wrexham LL13 7TU**

 **Cyngor Bwrdeistref Sirol Wrecsam ,Tai a Diogelu'r Cyhoedd, Ffordd Rhuthun, Wrecsam LL13 7TU**



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From: Justin Paul [<mailto:Justin@j10planning.com>]
Sent: 17 October 2017 15:12
To: Matthew Phillips; Mared Rees; Maureen Lee
Cc: Michael Forgrave; Harry Reece; Lee Kendall
Subject: Gower Homes : Vicarage Lane, Gresford

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Good afternoon Mared and Matthew

Following on from our meeting back on 1 August the client team has made progress with technical and design matters.

Lee Kendall of Curtins has been in touch with Pete Douthwaite and now with Phil Palmer.

We have not had any formal feedback from Maureen Lee in Housing, but have followed the verbal advice provided in developing eth design .. any input from Maureen would still be helpful if that is possible ?

Drainage work has been undertaken, which is informing eth design, along with ecology and tree investigations.

I think we ought to be in a position to meet again w/c 13 November with a more developed layout and design solution and I would like to get a date in the diary with Officers if I may.

I look forward to hearing from you.
Kind regards
Justin

Justin Paul BA BTP MRTPI
MANAGING PARTNER

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Head of Environment and Planning
Pennaeth yr Amgylchedd a Chynllunio
Lawrence Isted



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Curtains - Consultants

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Date/Dyddiad
Ask for/Gofynner am
Direct Dial/Rhif Union
E-mail/E-bost

PRE/2017/074
12th October 2017
Mr P Palmer
01978 729688
phil.palmer@wrexham.gov.uk

FAO: Lee Kendall

Dear Lee

**Land off Vicarage Lane, Gresford, Wrexham.
Proposed Residential Development (40 dwellings)**

I refer to your email / consultation dated 11/10/2017 including layout plan (Drg. No. 065526-CUR-00-ZZ-DR-TP-03001 Rev P01) in respect of the above and comment as follows:-

The development site is located on Vicarage Lane which is a classified road subject to a 30mph speed limit west of the Trewythen Hall access and 60mph east of this access.

Any proposed / existing accesses within the 30mph zone would normally be required to provide visibility splays of 2.4 x 56m in both directions measured to the nearside edge of the adjoining highway in accordance with Manual for Streets. However, I understand that you have recently carried out a speed survey which determined 85th percentile speeds of 24.9mph for vehicles travelling eastbound (away from village) and 29.1mph for vehicles travelling westbound (towards Gresford).

The submitted layout plan indicates splays of 2.4 x 31m to the north west and 2.4 x 39m to the south east. However, based on these determined speeds, any proposed access serving a residential development would need to provide visibility splays of 2.4 x 41m to the south east and 2.4 x 33m to the north west measured to the nearside edge of the adjoining highway in accordance with Manual for Streets. It would appear possible to provide a suitable access from the proposed development site which could provide adequate visibility. However, there are a number of mature trees and an established hedgerow fronting the site which would need to be removed to achieve the required splays.

I have discussed the proposed traffic management measures (ie/ priority system) with our Traffic Section. The proposed traffic management measures are considered unacceptable and would not be supported.

A previously conducted traffic count along Vicarage Lane measured average two way daily flows (12 hr flows) of 766 movements, which included both cars and HGVs. However, the proposed development has the potential to generate around 400 additional vehicle movements per day along this section of Vicarage Lane which is considered to be a significant increase compared with existing traffic flows along this lane.



Although the village centre is only a relatively short distance from the development site, there are no existing footways between the site and the junction with Chester Road. Although, a new footway could be provided along the entire site frontage, there is no scope to construct a new footway alongside the existing carriageway leading to the village centre given the limited available carriageway width between the existing properties along this section. Pedestrians walking from the proposed dwellings would have to walk in the order of 140m along Vicarage Lane without the benefit of any footway provision to reach any existing footway provision within the village which is considered unacceptable.

Some of the existing properties along this section of Vicarage Lane do not have adequate off-street parking provision which results in vehicles being parked along the highway. Parked vehicles typically affect vehicle flows along this section and can result in pedestrians walking along the road having to walk around these vehicles which is not ideal. Although the submitted layout plan indicates the provision of additional off-street parking provision for visitors / residents along Vicarage Lane, visitors / residents quite commonly prefer to park directly outside their properties for security / convenience reasons.

I have visited the site on a number of occasions and witnessed a significant number of vehicles parked along this section of Vicarage lane on both sides of the road. I have witnessed both milk tankers and tractor / trailers trying to negotiate between these parked vehicles on a number of occasions.

The proposed traffic management proposal / priority system including provision of 1.8m wide footway is likely to result in additional issues along this section of Vicarage Lane. Such issues include:-

- Vehicles travelling north west along Vicarage Lane may not see vehicles turning left off Chester Road or right off Old Wrexham Road into Vicarage Lane and continue travelling through the restricted section of carriageway. This would result in vehicles having to sit and wait for the oncoming traffic to clear. During this time, any traffic arriving behind these waiting vehicles has the potential to back up onto Chester Road and across the existing junction which is unacceptable. This has the potential to increase the likelihood of danger to road users and pedestrians.
- Any cars visiting the properties along the restricted section of Vicarage Lane may park along this section and restrict the available carriageway width. Any larger vehicles eg/ milk tankers, HGVs may well be unable to pass along this section which would be unacceptable.
- The location of the footway on the corner of the Vicarage Lane / Old Wrexham Road will make the turning manoeuvre of vehicles left into Old Wrexham Road more difficult and vehicles are likely to encroach over the centreline of the road.

The proposed development site would therefore not appear to meet the requirements of the settlement policies (3.4 & 3.6) detailed in TAN 18. These policies require residential developments to provide safe walking and cycling routes to local facilities and public transport stops.

I would therefore consider the proposed development site to be in an unsustainable location for a development of this size (approx. 40 dwellings) and does not support the opportunity for residents to walk safely to local facilities and public transport stops. I would therefore not be able to support any application for such a development in this location for the reasons given above.

You are advised that the above comments are those of an officer of the council and do not commit the Council in any way with regard to the determination of any formal planning application that may be submitted. You are also advised that the above comments take account of policies and guidance adopted by the Council at the present time and which remain open to continuous review.

Yours faithfully

A handwritten signature in black ink. It begins with a large, stylized capital letter 'D'. To the right of the 'D' is the name 'Hulten' written in a cursive, flowing script.

Service Manager Environment

MR JUSTIN PAUL
J10 PLANNING
1-3
UPPER EASTGATE ROW
EASTGATE ROW NORTH
CHESTER
CH1 1LQ

Your Ref/Eich Cyf
Our Ref/Ein Cyf
Date/Dyddiad
Ask for/Gofynner am
Direct Dial/Rhif Union
E-mail/E-bost

ENQ/2017 /0146
11/08/2017
Dave Sharp
01978 298876
Principal Building Control Surveyor

Dear Sir/Madam,

Town and Country Planning Act 1990

RESIDENTIAL DEVELOPMENT
LAND OFF VICARAGE LANE GRESFORD, WREXHAM, LL12 8UW.

I refer to your enquiry for the above proposal and the subsequent meeting held on 01st August.

Validation Requirements

A formal planning application would need to be accompanied by the following to be validated:

- Full/Outline planning application forms;
- 1:1250/1:2500 Site location plan with the land subject to the application edged red and any other land in your ownership edged in blue;
- 1:200/1:500 Block plan with the proposed site layout edged in black;
- 1:100 Existing and proposed floor plans and elevations;
- 1:100 Street scene elevations
- BS5837:2012 Arboricultural Survey including Impact Assessment
- Ecological Assessment
- Bat Survey
- Landscape and Visual Impact Assessment
- Hedgerow Assessment
- Foul and Surface Water Drainage Scheme
- Planning Statement
- Design and Access Statement
- Planning application fee

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Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.*

*We welcome correspondence in Welsh.
We will respond to any correspondence in Welsh and this will not lead to any delay.*

Relevant Planning Policy & Guidance

The following planning policies and supplementary planning guidance is applicable to your proposals:

- Wrexham UDP Policy PS1
- Wrexham UDP Policy PS2
- Wrexham UDP Policy GDP1
- Wrexham UDP Policy GDP2
- Wrexham UDP Policy EC1
- Wrexham UDP Policy EC2
- Wrexham UDP Policy EC4
- Wrexham UDP Policy EC5
- Wrexham UDP Policy EC6
- Wrexham UDP Policy H5
- Wrexham UDP Policy H7
- Wrexham UDP Policy CLF5
- Wrexham UDP Policy T8
- Local Planning Guidance 07 – Landscaping and Development
- Local Planning Guidance 10 – Public Open Spaces on New Housing Developments
- Local Planning Guidance 13 – Housing in the Countryside
- Local Planning Guidance 16 – Parking Standards
- Local Planning Guidance 17 – Trees and Development
- Local Planning Guidance 21 – Space Around Dwellings
- Local Planning Guidance 27 – Developer Contributions to Schools
- Local Planning Guidance 28 – Affordable Housing
- Local Planning Guidance 32 – Biodiversity and Development

Proposal

Principle

Local Plan

The site is located within designated green barrier and special landscape area as identified on Proposals Map 3 INSET 4 of the Wrexham UDP 1996-2011.

UDP Policy EC1 states that within green barriers, development will only be granted planning permission if it maintains the openness of the green barrier and does not conflict with the purpose of including land within it.

UDP Policy H5 states amongst other criteria that outside defined settlement limits, new dwellings will only be permitted if they comprise infilling, are for agricultural or forestry workers or comprise exception site dwellings.

*Rydym yn croesawu gohebiaeth yn Gymraeg.
Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.*

*We welcome correspondence in Welsh.
We will respond to any correspondence in Welsh and this will not lead to any delay.*

The site comprises an agricultural field. Mature trees and hedgerows run along the northern, eastern, southern and part of the western boundaries of the site.

Vicarage Lane runs from the northern to the south-easterly end of the site. Residential properties lie to the north-west, south-east and on the adjacent side of Vicarage Lane, to the north-east. Agricultural fields lie to the west and south.

Based on the submitted information and site location, the proposal would not fall under the criteria allowed under Policies EC1 and H5 of the UDP and there is therefore a presumption against the development.

Material Considerations

S.38(6) of the Planning Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan, unless material considerations indicate otherwise.

Green Barrier

The UDP designation of Green Barriers is consistent with the Green Wedges referred to in Planning Policy Wales. Planning Policy Wales advises that inappropriate development should not be permitted within Green Wedges. As specified above, the proposal for 40 no. residential units would represent inappropriate development.

Despite the age of the UDP, Policy EC1 is considered remains broadly consistent with PPW and is therefore afforded substantial weight against the scheme, as set out in paragraph 4.8.14 of PPW.

PPW paragraph 4.8.15 states that inappropriate development should not be granted planning permission *'except in very exceptional circumstances where other considerations outweigh the harm the development would have on the green barrier'*.

In the context of the policy presumption against the development and the advice set out within PPW, any formal planning application submission would need to demonstrate that the proposal represents very exceptional circumstances, sufficient to justifying approval of the scheme.

Housing Land Supply

Wrexham Borough Council is unable to demonstrate that it has a 5 year housing land supply. TAN 1 states at paragraph 6.2 that *'the need to increase supply should be given considerable weight when dealing with planning applications, provided that the development would otherwise accord with both national and local planning policy'*.

The proposal for 40 no. units, is considered would boost the supply of housing in Wrexham and this would weigh in favour of the proposal.

Planning History - Appeal Decision

Rydym yn croesawu gohebiaeth yn Gymraeg.

Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.

We welcome correspondence in Welsh.

We will respond to any correspondence in Welsh and this will not lead to any delay.

A planning application for up to 20 no. self-contained bungalows (P/2014/0815) on the adjacent side of the road was dismissed at appeal on 25th November 2015.

The principle reason for refusal cited that the development represented inappropriate development in the green barrier, failing to maintain the green barriers openness and that there were no exceptional circumstances sufficient to outweigh the harm identified.

Notwithstanding that the appeal was determined nearly two years ago, the decision would still be a material planning consideration in the determination of any formal planning application for the development proposed, given its proximity to the application site and similar policy constraints.

Loss of BMV Agricultural Land

The land classification of the application site is currently unknown. Any loss of land identified as best and most versatile would be considered in the overall planning balance, having regard to UDP Policy EC2, should a formal planning application be submitted.

Sustainable Development

Any formal planning application would need to demonstrate that the proposal meets the social, environmental, economic and cultural dimensions of sustainable development, as set out in the Well-being of Future Generations Act (Wales).

Having regard to the above, the bottom end of the site is located approximately 300m south of Chester Road, which is the main road running through the Settlement, of which has a range of services and facilities.

The site is considered to be sustainably located, however the lack of a footpath along Vicarage Lane is considered weighs against the site location, given this would potentially deter pedestrians from walking along Vicarage Lane.

It is recognised that the proposal would fulfill an element of the social and economic dimensions of sustainable development, having regard to provision of affordable housing and through the construction of the development and associated supply chain.

Special Landscape Area

UDP Policy EC5 requires development to conform to a high standard of landscaping and design, and special attention will be paid to minimising the proposals visual impact from nearby and distant viewpoints.

The overall visual impact of the proposal would need to be demonstrated in a Landscape and Visual Impact Assessment, required to be submitted to accompany any formal planning application.

Conclusion

Rydym yn croesawu gohebiaeth yn Gymraeg.

Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.

We welcome correspondence in Welsh.

We will respond to any correspondence in Welsh and this will not lead to any delay.

The proposal would represent inappropriate development in the green barrier, in accordance with the provisions set out within national and local plan policy.

As per paragraph 4.8.15 of Planning Policy Wales, any formal planning application would need to demonstrate that there are very exceptional circumstances to warrant approval of this scheme, and would be considered in the overall planning balance exercise in the determination of any formal planning application.

Design and Layout

Based on the indicative Site Layout Plan (Dwg No. SK003 Rev C), the overall layout is considered to be appropriate at this stage.

It was suggested in the meeting that a stronger presence was achieved at the site entrance, with a re-assessment of the design and layout of the corner plots, with examples tabled as provision of dual frontage plots and potential re-orientation of these dwellings.

It was also advised that plots 1 – 10 were re-orientated to front Vicarage Lane with parking to the rear. This was considered to better tie this part of the development to the existing dwellings on the adjacent side of Vicarage Lane.

Provision of 2no. POS is considered to be appropriate, with properties fronting these areas providing active frontages and an element of natural surveillance.

Natural features, including boundary hedgerows and in particular the roadside hedgerow, should be retained where possible which would help to mitigate against any impact a new residential development would have in the area.

Residential Amenity

Spacing standards between existing and proposed properties would need to be adhered to, with particular sensitivity given to nearby existing dwellings to the north of the site.

Highway Safety

There are no footways along this part of Vicarage Lane, leading to Chester Road running through Gresford.

On the basis that the Highway Officer is meeting the Highway Consultant on site to discuss highway safety matters relating to the site, comments made by the Highway Officer following this meeting will be sent to you accordingly.

Adequate parking provision should be provided for each proposed plot within the site.

Drainage

The site is located within DAM Zone A as defined within TAN 15.

Rydym yn croesawu gohebiaeth yn Gymraeg.

Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.

We welcome correspondence in Welsh.

We will respond to any correspondence in Welsh and this will not lead to any delay.

There are some areas identified as being at risk of surface water flooding as identified on NRW's Updated Floodmap for Surface Water flooding. This would appear to be associated with the local topography but would also appear to coincide with the location of at least 2 properties on the indicative layout provided. It is advised that the surface water flood risk implications on the site are better considered when looking at final site layout.

The site poses a good opportunity to incorporate a drainage scheme compliant with the Welsh Government's National Standards for Sustainable Drainage Systems and it is recommended that this is investigated prior to the consideration of other options.

A surface water drainage scheme should be investigated and submitted with any formal submission of a planning application.

Ecology

The site is in an area known to support great crested newts.

An ecological mitigation area would be required as part of the proposal and the retention of the hedgerows for habitat connectivity, where possible.

As discussed, the hedgerow assessment which has been undertaken would help to further inform the overall design and layout of the scheme.

Bat Surveys should also be undertaken given the presence of mature trees on the site boundaries.

Trees

A full arboricultural survey (including impact assessment) should be undertaken in accordance with BS5837:2012 and submitted with any formal planning application.

Subsequent design proposals should provide effective long-term physical protection for those trees and hedgerows agreed for retention.

Boundary plots should be positioned to ensure valued trees and hedgerows are not included within confined residential garden areas in order to avoid raising unnecessary post development pressures.

Affordable Housing

In accordance with Wrexham UDP Policy H7, provision of 25% affordable should be made, equating to 10 no. units based on a 40 no. unit scheme.

At this stage, it is advised that the split comprises 5 no. social rented (1-2 bed) and 5 no. intermediate housing (2-3 bed).

Should this alter prior to formal submission, I will let you know.

Rydym yn croesawu gohebiaeth yn Gymraeg.

Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.

We welcome correspondence in Welsh.

We will respond to any correspondence in Welsh and this will not lead to any delay.

Education

On the basis that the Site Layout Plan is indicative only, an exact contribution cannot be provided at this stage.

Once the number of bedrooms for each dwelling has been established, the education contribution will be calculated and an exact figure provided.

Conclusion

The proposal would represent inappropriate development in the green barrier, in accordance with the provisions set out within national and local plan policy.

As per paragraph 4.8.15 of Planning Policy Wales, any formal planning application would need to demonstrate that there are very exceptional circumstances to warrant approval of this scheme, and would be considered in the overall planning balance exercise in the determination of any formal planning application.

Other material considerations should also be taken into account accordingly.

The above comments are the informal views of an Officer of the Council and do not commit the Council in the determination of any formal planning application that may be submitted.

Yours faithfully,



Pennaeth yr Amgylchedd a Chynllunio/Head of Environment and Planning

From: [Mared Rees](#)
To: [Justin Paul](#)
Subject: RE: Gower - Gresford
Date: Tuesday, August 8, 2017 10:57:26 AM
Attachments: [image001.png](#)
[image003.png](#)

Justin

The only change that's been requested is from Dan, who has asked that the start of the second paragraph on page 2 is changed to:-

DD noted the additional information contained in the prospectus document, however the LDP was not calling for additional sites...'

I hope to send the pre-application letter to you in response to the meeting, by the end of the week.

Thanks

Mared

From: Justin Paul [mailto:Justin@j10planning.com]
Sent: 04 August 2017 13:01
To: Mared Rees
Subject: Gower - Gresford

This email's attachments were cleaned of potential threats by Wrexham Council's Security Gateway.
Click [here](#) if the original attachments are required (justification needed).

Hi Mared

I attach a set of meeting notes that I have assembled ... perhaps you would be kind enough to circulate and confirm whether you wish to add anything and that they reflect an accurate account of the discussions and guidance conveyed.

I look forward to hearing from you.

Kind regards

Justin

Justin Paul BA BTP MRTPI
MANAGING PARTNER

J10 Planning Ltd

1-3 Upper Eastgate Row, Eastgate Row North, Chester, CH1 1LQ

01244 349400 // 07971 446630 // justin@j10planning.com

Company Reg. No. 6000409 VAT Reg. No. 815630835



From: [Mared Rees](#)
To: [Justin Paul](#)
Subject: ENQ/2017/0146 - Land off Vicarage Lane, Gresford
Date: Tuesday, August 1, 2017 1:50:40 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Justin

Was good to meet you this morning.

As per the discussion undertaken, the Clerk to Gresford Community Council is Serena Baxter, email address is clerkgresford@gmail.com

Dan is sending over the LDP timetable to you this afternoon.

I await a copy of the original ATC undertaken for the adjacent site from Lee.

My understanding is that North Wales Minerals Advice Team would be contacted your end regarding extraction issues etc.

Did you have the land classification of the site?

In terms of timescales, we are looking at September for any further discussion.

Any queries on the above, please let me know.

Thanks

Mared

Mared Rees
Swyddog Gorfodi Cynllunio/Area Planning Officer



01978 298776



Wrexham County Borough Council, 16 Lord Street, Wrexham LL11 1LG



Cyngor Bwrdeistref Sirol Wrecsam, 16 Stryt yr Arglwydd, Wrecsam LL11 1LG



wrexham.gov.uk | wrecsam.gov.uk



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J10 Planning Limited
1-3 Upper Eastgate Row
Eastgate Row North
Chester CH1 1LQ

Telephone 01244 349 400
Fax 01244 349 402
Mobile 07971 44 66 30

E-mail justin@j10planning.com
Home Page www.j10planning.com



Meeting Notes

Date : 1 August 2017

Site : land at Vicarage Lane, Gresford, Wrexham

Venue : Wrexham Council, Lord Street Offices, Wrexham

Attendees :

- o Mared Rees : WCBC : Planning DC
- o Matthew Philips : WCBC : Planning DC
- o Peter Douthwaite : Wrexham CBC : Highways
- o Dan Davies : WCBC : Planning Policy
- o Maureen Lee : WCBC : Housing
- o Justin Paul : J10 Planning
- o Michael Forgrave : Gower Homes
- o Harry Reece : Base Architects
- o Lee Kendall : Curtins

INTRODUCTION

JP explained that Gower had an option agreement with the landowner to promote the land through the LDP and to submit for planing.

JP, HR and **LK** presented the scheme and used the Prospectus document to run through the aspirations.

PLANNING POLICY

DD confirmed that the site was covered by the Stage 1 Green Barrier review which had found that this area would be removed from the designation as the site does not fulfil the function or purposes of the Green Barrier : this would provide some material weight to any policy view and determination of an application.

MR offered some other exceptional circumstances that could support a proposal; notably the lack of a 5 year housing land supply, the affordable housing that would be provided and its general sustainability credentials.

DD noted the additional information contained in the Prospectus document, however the LDP was not calling for additional sites and there was no obvious opportunity to revisit the fact that Gresford (despite being a Tier 2 Settlement with no housing allocations pending) could be reviewed.

JP noted that the site had (as part of a wider/larger site already been presented as a site and that Officers had discounted it for highway and ecology reasons; and that this document was now seeking to demonstrate things had changed (given the additional studies undertaken and more proven deliverability) and that the Authority ought to review the site and allocate it as a Preferred “A” site.

DD stated that applying for planning permission would carry weight and if approved it would then be classed as a commitment in any emerging 5 year housing land supply.

DD stated that the LDP programme had slipped and instead of presenting the Publication version for consultation in November 2017 it was likely this would now slip to Spring 2018; a new Delivery Agreement programme would be presented to Members of the Executive Board on 21 September 2017.

AFFORDABLE HOUSING

ML explained that the proposed unit type for affordable being proposed (4 no. 1 bed, 4 no. 2 bed and 2 no. 3 bed) appeared to reflect the need in the Ward of Gresford & Marford; which was for :

- 143 : 1 bed
- 146 : 2 bed
- 114 : 3 bed
- 12 : 4 bed

And that the tenure split would be something along the lines of 50% rented and 50% for sale (discounted market value shared equity - as delivered at the Sidings and to be delivered at Boozey Fields). **MP** stated that this would meet Policy H7 of the UDP which sought 25% provision.

HIGHWAYS

PD expressed concern that Members would be against a scheme that was unable to provide pedestrian footway links to the nearest network and he would be wanting **LK** to demonstrate a safe route into the village.

At present he felt he would be unable to support a scheme, but was aware that the appeal decision on the care home opposite did not exactly support this view.

He agreed to meet **LK** on site and consider potential for build outs / chicanes that would slow any traffic.

He wishes **LK** to consider cycling and wanted to learn how any existing on-street resident parking might be affected and aided.

PD and **MR** asked for details of the 2015 and 2017 speed surveys to be provided.

ECOLOGY

MR stated that **Emma Broad** had indicated that the site supported GCN's and was keen to see the retention of as much hedgerow as possible.

TREES

MR stated that **Jon Brewin** would expect a TCP and AIA to be submitted.

He would prefer not to see trees in gardens and no overshadowing – a shading assessment would be helpful.

MINERALS

MR stated that **Martha Savage** – the Minerals Officer – would be a good contact to make; nonetheless **MP** agreed that any opportunity for prior extraction would be limited because it would be negated by buffer zone and also the necessity of a suitable highway route into the site.

DRAINAGE

MR stated that **Neil Taunt** would be keen to see the use of SUD's here and for the options to be considered; the land is likely to be suitable for soakaways given its free draining nature.

AGRICULTURAL LAND QUALITY

MP did not see this as a significant item and felt that housing need would override the need to protect land that was located on the edge of settlements.

DESIGN

MP suggested having the affordable units sited more on the back of the highway rather than the rear gardens being adjacent the highway.

He also felt more work was needed on making more of the main site access.

It was suggested that the elevations to Gowers more standard house types would benefit from some alterations so that those dwellings located at entrances and junctions/corners managed to consider how two principle elevations might work.

OTHER MATTERS

Local Ward Councillor was Andrew Atkinson : a new member who sat on the Planning Committee and was elected in 2017.

NEXT STEPS

MP suggested that it would appear the scheme was about 75% on its way to be ready for an application submission.

JP stated that the gaps would be filled in and design refined and that the team would come back to Officers with a more detailed layout prior to instigating the formal DMO pre-application consultation process.

LK would arrange a site meeting with **PD** re. highways.

ML would confirm the preferred affordable tenure type.



10 July 2017

Dave Sharp
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

BY EMAIL ONLY

Dear Dave

PRE-APPLICATION MEETING REQUEST : development team approach

land off Vicarage Lane, Gresford, Wrexham, LL12 8UW

My client (Gower Homes) have entered into an option agreement with the landowners of this land at Gresford which they would like to explore the development potential of prior to advancing any formal planning application.

This site comprises the land identified on the attached layout plan.

The land extends to 2.74 ha (6.78 acres) and having undertaken a design capacity exercise we consider it offers the opportunity for around 40 dwellings (14.6 dph) with enhanced levels of community open space.

The proposed density is considered appropriate in this location taking into consideration the local “grain” of Gresford and the need to provide 25% affordable housing. It will allow a new urban edge to be created along logical boundaries that already exist. We feel that the proposed layout sympathetically reflects the character of the open countryside fringe to Gresford and we have produced an LVIA which has informed the layout.

Technical work has already been undertaken, but some other items are in the process of being completed and commissioned.

In the light of the Council's pre-application charging schedule my client has made payment online today for the pre-application fee of £1,000; a copy of the receipt is also included.

J10 Planning Ltd 1-3 Upper Eastgate Row Eastgate Row North Chester CH1 1LQ
Tel +44(0)1244 349 400 Fax +44(0)1244 349 402
post@j10planning.com www.j10planning.com

We would like to engage with Officers at Wrexham to discuss the development concept ambitions and opportunities for this site and therefore request that a meeting is arranged that will involve Planning (DC and Policy) and Highway Officers, where we can constructively discuss the prospect of my client subsequently submitting for Detailed planning. On our part, we would be looking to bring Design, Highway and Planning members of our team to the meeting, together with our client.

Please contact me at any time on either the office number, my mobile (07971 446630) or via email (justin@j10planning.com) in order to arrange the meeting.

I look forward to hearing from you.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Justin Paul', with a stylized flourish at the end.

Justin Paul BA BTP MRTPI

Encs **Site Masterplan**
 Pre-app form
 Fee receipt

Cc **M Forgrave, Gower Homes**

From: [Michael Forgrave](#)
To: [Justin Paul](#)
Subject: FW: Receipt WRWS00761148
Date: Monday, July 10, 2017 5:15:28 PM
Attachments: [image001.png](#)

I paid the gresford pre app this afternoon.
Mike.

Michael Forgrave Managing director

michael.forgrave@gowerhomes.co.uk

Tel: 01978 291 364

www.gowerhomes.co.uk

8 Temple Row | Wrexham | LL13 8LY

Take a look at our new look website www.gowerhomes.co.uk featuring our current and upcoming developments



From: Wrexham_County_Borough_Council_payments@civicaepay.co.uk [mailto:Wrexham_County_Borough_Council_payments@civicaepay.co.uk]

Sent: 10 July 2017 14:15

To: michael.forgrave@gowerhomes.co.uk

Subject: Receipt WRWS00761148

Receipt Details

Payment made to:
Wrexham County Borough Council
Lambpit Street
Wrexham
LL11 1WS

Card holder details:
Gower Homes Ltd M W Forgrave
8 Temple Row
Wrexham
LL13 8LY

Receipt number	WRWS00761148
Authorisation code	011799
Merchant Number	**19970
Terminal ID	***0880

Card type	MASTERCARD CREDIT
Card number	*****0162
	KEYED

Date/Time	10/07/2017 14:14:21
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NAPC3283000000 Planning	Planning Applications - Vicarage Lane G	1000.00	0.00
NAPC3283000000 Card/PayPal Charges		14.00	0.00
Total Payment		1000.00	

Total Charges

14.00

Total Amount

1014.00

Thank you. Your payment for £1014.00 has been accepted
Your account will be debited with the above amount.

Please retain this copy for your records.
This is not a VAT receipt

www.wrexham.gov.uk

Statutory Enquiry Form for Pre-application Advice

Please complete this form with as much information as possible.
Send the completed form to planning@wrexham.gov.uk

Payments can be by made by debit/credit card online using e-store:
<http://www.wrexham.gov.uk/planningfees>

Payment over the telephone on **01978 298994**.
Please note cash and cheque payments are **not** accepted.



Applicant Name, Address and Contact

Name:

Address:

Postcode:

Telephone number:

Mobile number:

E-mail address:

Agent Name, Address and Contact

Name:

Address:

Postcode:

Telephone number:

Mobile number:

E-mail address:

Description of the Proposal

Residential development

Total number of new units:
(if applicable)

Increase in floorspace (m²):

Site Address (if different to applicant address)

Address:

land off Vicarage Lane

Gresford

Wrexham

Postcode:

LL12 8UW

Location Plan

Please "tick" the box below to confirm you have submitted a plan which identifies the land to which this application relates, drawn to an identified scale and showing the direction of North.

I have attached a location plan that meets the requirements outlined above:

**Additional Information**

To help ensure that we can provide the best possible response to your pre-application enquiry, you are encouraged to submit as much additional information as possible to accompany this form. Please list any additional information you are submitting below (*continue on a separate sheet if necessary*):

Development Team Approach:

Do you wish to use the Development Team Approach
(Please see website for further information)

☒

YES

☐

NO

Fee:

I confirm that the correct fee will be paid online via our website
or over the telephone (please tick as appropriate).

☒

E-STORE

☐

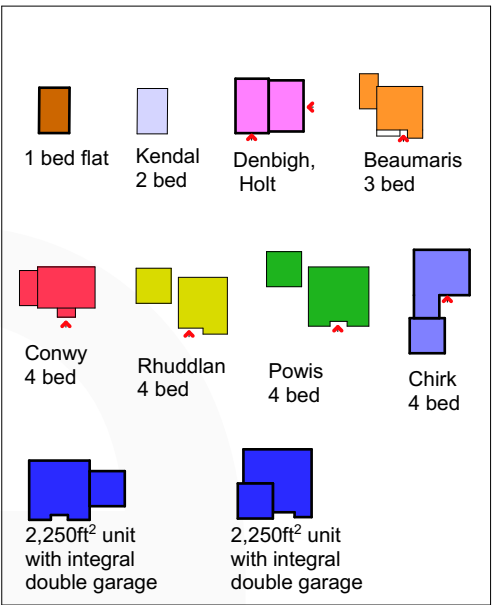
PHONE

If you are unsure of the correct fee, please see the FEE SHEET which can be found on our website
www.wrexham.gov.uk/planning

Signed (applicant):

or

Signed (agent):**Date** (DD/MM/YYYY): 10 July 2017



KEY
Total number of affordable Units = 10
Total number of market dwellings = 30

Council Min required area of public open space
based on 40m² / house = 1,600m²
= 0.39 acres

B	6.7.17	POS reduced, large units added in south site re client email 5 July 17	DO	HR
A	5.7.17	POS reduced, Affordables increased, mix amended re client email 21 June 17	DO	HR
Rev No.	Date.	Rev.	By.	Chk.

COMMENT

Scale.	1:1250 @ A3	Date.	29 June 2017	Drawn by.	DO	Chk.	HR
base. ARCHITECTS							
Project Title. Housing Vicarage Lane, Gresford							
Client. Gower Homes							
Drawing Title. Initial Master Plan							
Project No.	BA1858	Drawing No.	SK 003	Revision.	B		

base Architecture and Design is a registered Limited Company



APPENDIX B

Green Barrier PPW

policy extract



Llywodraeth Cymru
Welsh Government



Planning Policy Wales



Edition 9
November 2016

uses in accessible locations can increase social inclusion, reduce the need to travel and make towns safer for people both day and night. Mixed use can incorporate all or a selection of office, industrial, leisure, retail, community and residential uses if sensitively designed (4.11.7 and 4.11.8). Mixed use can increase the feasibility of delivering local renewable and low carbon energy solutions such as district heating schemes (see Section 12.8). Development plans should identify the range of facilities and activities that communities wish to be provided and maintained in urban locations. Plans should encourage the clustering of complementary enterprises in industrial and commercial areas so as to reduce traffic generation.

4.7.7 For most rural areas the opportunities for reducing car use and increasing the use of walking, cycling and public transport are more limited than in urban areas. **In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes** when compared to the rural area as a whole. Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities and be identified as the preferred locations for most new development including housing and employment provision. The approach should be supported by the service delivery plans of local service providers.

4.7.8 **Development in the countryside** should be located within and adjoining those settlements where it can be best be accommodated in terms of infrastructure, access and habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design.

4.8 Managing urban form by means of green belts and green wedges⁹

4.8.1 Around towns and cities there is often the need to protect open land. Local planning authorities need to **consider establishing Green Belts and making local designations, such as green wedges**. Both Green Belts and green wedges must be soundly based on a formal assessment of their contribution to urban form and the location of new development and can take on a variety of spatial forms. The essential difference between them is the issue of permanence. **Land within a Green Belt should be protected for a longer period than the current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process.**

4.8.2 Both Green Belts and green wedges can:

- provide opportunities for access to the open countryside;
- provide opportunities for outdoor sport and outdoor recreation;
- maintain landscape/wildlife interest;
- retain land for agriculture, forestry, and related purposes;
- improve derelict land; and
- provide carbon sinks and help to mitigate the effects of urban heat islands.



However, the extent to which the use of land fulfils these objectives is not a material factor in determining whether land should be included within a Green Belt or green wedge.

4.8.3 The **purpose of a Green Belt** 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.

4.8.4 All local planning authorities in parts of Wales which are subject to significant pressures for development must consider the need for Green Belts. Green Belts will not necessarily need to extend in a continuous band around an urban area.

4.8.5 **The most important attributes of Green Belts are their permanence and their openness.** In respect of permanence, the boundaries of Green Belts should be altered only in exceptional circumstances and land within a Green Belt should be protected for a longer period than the current development plan period. To maintain openness, development within a Green Belt must be strictly controlled. The general policies controlling development in the countryside apply in a Green Belt but there is, in addition, a general presumption against development which is inappropriate in relation to the purposes of the designation (see 4.8.14 to 4.8.18).

4.8.6 Green Belts should be established through development plans. Before designating land around an urban area as a Green Belt, local planning authorities must consider and justify which would be the most appropriate means of protection. When including Green Belt policies in their plans, authorities must demonstrate why normal planning and development management policies would not provide the necessary protection.

4.8.7 Green Belt boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term. Where the designation of a Green Belt is likely to affect more than one local authority, consultation will be necessary with all authorities likely to be affected.

4.8.8 Since Green Belts require long term protection, when considering Green Belt designation local planning authorities will need to ensure that a sufficient range of development land is available which is suitably located in relation to the existing urban edge and the proposed Green Belt, bearing in mind the longer term need for development land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. This may require land to be safeguarded, and boundaries of a proposed Green Belt must be carefully defined to achieve this.

4.8.9 Settlements and other developed sites within a Green Belt should only be included as part of the Green Belt if no new building, or infilling only, is proposed. Policies should list and define the boundaries of settlements where infilling would be permitted. Settlements and other sites where limited expansion is proposed should be excluded from the Green Belt and policies for those settlements should be included in the development plan.



4.8.10 **Local designations such as green wedges** may be justified where land is required to serve the same purpose to a Green Belt (see 4.8.3), but these designations do not convey the permanence of a Green Belt.

4.8.11 Like Green Belts, green wedges should be established through development plans. Local planning authorities should only maintain green wedges where they can demonstrate that normal planning and development management policies cannot provide the necessary protection. They should state in their development plans the areas that require extra protection and why.

4.8.12 In defining green wedges it is important to include only land that is strictly necessary to fulfil the purposes of the policy. Factors such as openness, topography and the nature of urban edges should be taken into account. Clearly identifiable physical features should be used to establish defensible boundaries. Green wedge policies should be reviewed as part of the development plan review process. The general policies controlling development in the countryside apply in green wedges, but there is, in addition, a general presumption against development which is inappropriate in relation to the purposes of the designation (see 4.8.14 to 4.8.18).

4.8.13 As with Green Belts, when considering green wedges local planning authorities will need to ensure that a sufficient range of development land is available which is suitably located in relation to the existing urban edge and the proposed green wedge.

Inappropriate development

4.8.14 When **considering applications for planning permission in Green Belts or green wedges**, a **presumption against inappropriate development** will apply. Local planning authorities should attach substantial weight to any harmful impact which a development would have on a Green Belt or green wedge.

4.8.15 Inappropriate development should not be granted planning permission except in very exceptional circumstances where other considerations clearly outweigh the harm which such development would do to the Green Belt or green wedge. Green Belt and green wedge policies in development plans should ensure that any applications for inappropriate development would not be in accord with the plan. These very exceptional cases would therefore be treated as departures from the plan.

4.8.16 The construction of new buildings in a Green Belt or in a locally designated green wedge is inappropriate development unless it is for the following purposes:

- justified rural enterprise needs;
- essential facilities for outdoor sport and outdoor recreation, cemeteries, and other uses of land which maintain the openness of the Green Belt or green wedge and which do not conflict with the purpose of including land within it;
- limited extension, alteration or replacement of existing dwellings;
- limited infilling (in those settlements and other development sites which have been identified for limited infilling in the development plan) and affordable housing for local needs under development plan policies; or
- small scale diversification within farm complexes where this is run as part of the farm business.



4.8.17 The **re-use of buildings in a Green Belt or green wedge** is not inappropriate development provided that:

- the original building is substantial, permanent and capable of conversion without major reconstruction;
- the new use will not have a greater impact on the openness of the Green Belt or green wedge and the purposes of including land within it. Strict control will need to be exercised over the extension, alteration or any associated use of land for re-used buildings; and
- the building is in keeping with its surroundings.

4.8.18 Other forms of development would be inappropriate development unless they maintain the openness of the Green Belt or green wedge and do not conflict with the purposes of including land within it.

4.9 Preference for the re-use of land

4.9.1 Previously developed (or brownfield) land (see Figure 4.4) should, wherever possible, be used in preference to greenfield sites, particularly those of high agricultural or ecological value. The Welsh Government recognises that not all previously developed land is suitable for development. This may be, for example, because of its location, the presence of protected species or valuable habitats or industrial heritage, or because it is highly contaminated. For sites like these it may be appropriate to secure remediation for nature conservation, amenity value or to reduce risks to human health.

4.9.2 Many previously developed sites in built-up areas may be considered suitable for development because their re-use will promote sustainability objectives. This includes sites:

- in and around existing settlements where there is vacant or under-used land, commercial property or housing;
- in suburban areas close to public transport nodes which might support more intensive use for housing or mixed use;
- which secure land for urban extensions, and;
- which facilitate the regeneration of existing communities.

4.9.3 If the Welsh Government's objectives for the more sustainable use of land and buildings and the re-use of previously developed sites are to be achieved, local authorities and other stakeholders will need to be more proactive. Wherever possible, local authorities should work with landowners to ensure that suitable sites are brought forward for development and to secure a coherent approach to renewal. In some instances the local authority may need to purchase land in order to facilitate redevelopment. Wherever possible this should be done by negotiated agreement, but it may involve the use of **compulsory purchase powers**.



5. Environment and Conservation

Background

5.1 The local environment is one of the County Borough's greatest resources, being an essential component in residents' quality of life and in the successful development of local industrial and tourism initiatives. Environmental quality is under threat from many directions, including intensive farming methods, the destruction of natural habitats, the use of countryside for development, and the redevelopment of historic areas in settlements. The County Borough contains several derelict and underused or neglected sites and hazardous industrial uses. The Council is committed to action to rectify the damage done in the past, to prevent further deterioration, and to conserve and enhance those landscape and townscape elements which form an important part of the local heritage and its residents' quality of life. Necessary changes should respect and complement the character of the environment.

Green Barriers

Policy EC1 Within Green Barriers, development will only be granted planning permission if it is for agriculture, forestry, essential facilities for outdoor sport and recreation, cemeteries and other uses of land which maintain the openness of the Green Barrier and do not conflict with the purpose of including land within it.

5.2 There are several instances where existing settlements come into close proximity and there is a need to maintain a belt of countryside free from development. The purposes of a Green Barrier include:

- i) to prevent the coalescence of urban areas and villages with other settlements;
- ii) to assist in safeguarding the countryside from encroachment;
- iii) to protect the setting of urban areas and villages;
- iv) to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

In Wrexham, green barriers which possess the same characteristics and purposes of formal green belts, except in their long-term permanency, have coped with a wide variety of development pressures and successfully served their purposes. The designation of a green belt is therefore considered unnecessary. Mineral extraction and landfilling of wastes do not conflict with the purposes of the Green Barrier provided that the development does not detract from the open character of the area and includes high standards of restoration. Predominantly urban uses involving substantial built development or night-time lighting are not considered suitable uses in a green barrier.

APPENDIX C

Green Wedge

Review study extract



Wrexham Local Development Plan 2013 - 2028

EBNB01

housing

open space

employment

community

transport

education



Wrexham Strategic Green Wedge Review (October 2017)

Wrexham Strategic Green Wedge Review – (October 2017)

1. Introduction

- 1.1 The Council is in the process of preparing a new Local Development Plan (LDP, 2013 - 2028). As part of the evidence base to support preparation of the Deposit Plan it has been necessary to undertake a green wedge review.
- 1.2 The current adopted Unitary Development Plan (UDP) (1996 – 2011) uses the term Green Barrier to define areas of land between settlements where it is desirable to maintain the openness of the area, and to ensure that settlements do not coalesce, amongst other things as defined in national Planning Policy Wales (see section 3 below). Indeed the function of the Green Barrier is essentially the same as the Green Wedge as defined in National Planning Policy Wales (Edition 9, January 2016, para 4.8.3), it is only the terminology which differs. In order to maintain consistency with National Planning Policy and for the avoidance of doubt, the term Green Wedge shall be used for the remainder of this paper, and in the deposit LDP.
- 1.3 This review was undertaken in 2 stages, stage 1 to assess the requirement for Green Wedge designation directly surrounding the settlement limit of Wrexham Town in the context of the iterative process of selecting Key Strategic Sites (KSS) for development, and the western villages (area to the west of Wrexham town, which comprises a number of villages in close proximity); and stage 2 to review the remainder of the Green Wedge (GW) designation in the County Borough in preparation for the deposit LDP, and make recommendation regarding the need for any new designations. This document combines both stages and forms part of the evidence supporting the Deposit LDP.
- 1.4 The rest of this paper goes on to explain why a GW review is necessary, the key aims and objectives of the study; the function of the GW in the context of National Planning Policy, the methodology employed to undertake the review and the findings and conclusions of the review.

2. Why is a Green Wedge Review necessary?

- 2.1 The Preferred Strategy is proposing to make provision for 8525 new homes in order to deliver a requirement of 7750 homes over the plan period 2013-2028 together with a maximum of 45 hectares of employment land.
- 2.2 In relation to the existing UDP green wedge designation (or green barrier as it is referred to in the UDP), it has been rolled forward from past development plans without any formal review. As per national policy, and unlike Green Belt

designations which are considered to have an element of permanence, green wedge require review, and the most appropriate time to review the designations are during the development plan preparation process.

2.3 During the initial hearing session into LDP1 the Planning Inspector¹ questioned whether the proposed green wedge designation were based on a formal assessment in line with national policy, which further highlights the need to undertake this review. It is conceded that the green wedges proposed in LDP1 was carried forward from the UDP, without any formal review. In light of these comments it is apparent that any green wedge designation in deposit LDP2 will require full justification in line with national policy, irrespective of other development pressure, and the carrying forward of the UDP designations without a formal assessment is not an option.

Key Aims and Objectives

2.4 In light of the context referred to in the introduction, a review of the existing Green Wedge designations is necessary. The aims and the objectives of the overall review will be to:

- Review the green wedge designations in the UDP using a standard methodology;
- Make recommendations regarding the designation of green wedge to be fed into the deposit LDP, and justify where changes are deemed necessary including, if appropriate, the removal of the green wedge designation; and
- Make recommendations to fill the policy vacuum if it is deemed appropriate to remove green wedge designations in certain locations
- Understand if it necessary to designate any Green Belts or new green wedge in the County Borough?

¹ Wrexham County Borough Council Local Development Plan, Examination, Inspector's Preliminary Findings Paragraph 7.1.

3. National/ Local Policy Context

- 3.1 The following section outlines the policy context which guides development plans in relation to the designation of green wedges. Planning Policy Wales (PPW) (Edition 9, November 2016 – Chapter 4) sets out guidance on the designation of green wedge in development plans.
- 3.2 It states that both Green Belts and green wedges must be soundly based on a formal assessment of their contribution to urban form and the location of new development and can take on a variety of spatial forms. The essential difference between them is the issue of permanence. Land within a Green Belt should be protected for a longer period than the current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process (PPW 4.8.1).
- 3.3 Green wedges can perform certain roles such as providing access to the countryside, including opportunities for outdoor sport and recreation, maintain landscape and wildlife interests, retain land for agriculture and forestry, improve derelict land, and provide carbon sinks. However the extent to which the use of land fulfils these objectives is not a material factor in determining whether land should be included in green wedge designations (PPW 4.8.3). The objectives set out above are still worthy of consideration, and whilst it will not be appropriate to use green wedge designations to achieve them, it will be important to consider what policy approaches (either through local or national policy) could serve to protect those objectives.
- 3.4 The actual **purpose of Green Wedge** as set out in PPW (para 4.8.3) 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.
- 3.5 The most important attributes of green wedge is their openness (PPW 4.8.5). To maintain openness, development within a green wedge must be strictly controlled. The general policies controlling development in the countryside apply in a green wedge but there is, in addition, a general presumption against development which is inappropriate in relation to the purposes of the designation (see bullet points above). When including Green Belt and green wedge policies in their plans, authorities must demonstrate why normal planning and development management policies would not provide the necessary protection (PPW 4.8.6). Therefore part of the conclusion for each

area will include reference to alternative policy approach which may render a green wedge designation unnecessary.

- 3.6 Green wedges should only be maintained where normal planning and development management policies cannot provide the necessary protection. This assessment, and subsequently the LDP, will need to state where the areas are that require extra protection and why. In defining green wedges it is important to include only land that is strictly necessary to fulfil the purposes of the policy. Factors such as openness, topography and the nature of urban edges should be taken into account. Clearly identifiable physical features should be used to establish defensible boundaries. When considering green wedges there is a **need to ensure that a sufficient range of development land is available which is suitably located in relation to the existing urban edge and the proposed Green Wedge** (PPW 4.8.13). Therefore the need for green wedge designations will need to be balanced against the need to provide land allocations for development in the LDP.
- 3.7 The purpose of green wedge as set out in Planning Policy Wales is the same as the purpose set out in the Wrexham UDP. However a formal assessment of the green wedge designation is still necessary in order to understand whether the existing designation actually perform the purpose as set out in both local and national policy.

4. Methodology for the Green Wedge assessment

In relation to the assessment of existing areas of green wedge there is no nationally prescribed methodology, it was therefore necessary to devise one for the study. The approach taken was to use the purpose of green wedge as set out in national policy as the basis for the assessment (see section 3.4 above). The Home Builders Federation (HBF) and Natural Resources Wales (NRW) were consulted on the methodology in order to gain any initial comments on the approach taken. HBF suggested minor amendments which have been incorporated into the study, and NRW had no objection to the methodology.

Further comments were received following consultation on the Preferred Strategy. The following issues were identified:

- 1 comment was received questioning the boundaries used to define the green wedge adjacent the Key Strategic Site 2 (promoters of the site).
Response: The boundary of the green wedge on the eastern boundary of KSS2 was set along the edge of the original candidate site submitted. An amended alternative site was submitted by the site agents².
- Comments in general objecting to the development of some areas of green wedge.
Response: Comments regarding the development of green field sites are noted. The green wedge designation required review as part of the LDP process irrespective of the need to release some green field sites for development as part of the housing allocations in the deposit LDP. The strategic green wedge review has sought to retain green wedge designations where appropriate, whilst recognising the need to provide a sufficient range of development land suitably located in relation to existing urban edges.
- Comments were received questioning why not all of the green barriers had been reviewed prior to the consultation on the Preferred Strategy.
Response: Justification for the two stage approach was outlined in paragraph 4.1 of the Stage 1 Green Wedge Review. Ultimately all interested parties will have an opportunity to comment on the overall assessment of the green wedge, and proposed designation as part of the deposit LDP consultation.
- 1 comment was received questioning the assessment of candidate sites grouped together.
Response: In certain areas it was considered appropriate to group candidate sites together. In this example there are a number of

² Alternative Sites Register (Nov 2016) <http://wrexhamldp.wrexham.gov.uk>

candidate sites in the area between Mold Road and the train line in the area between Wrexham and Gwersyllt. The area has common characteristics and can be read as a whole, and therefore its overall function as an area of green wedge was assessed on that basis.

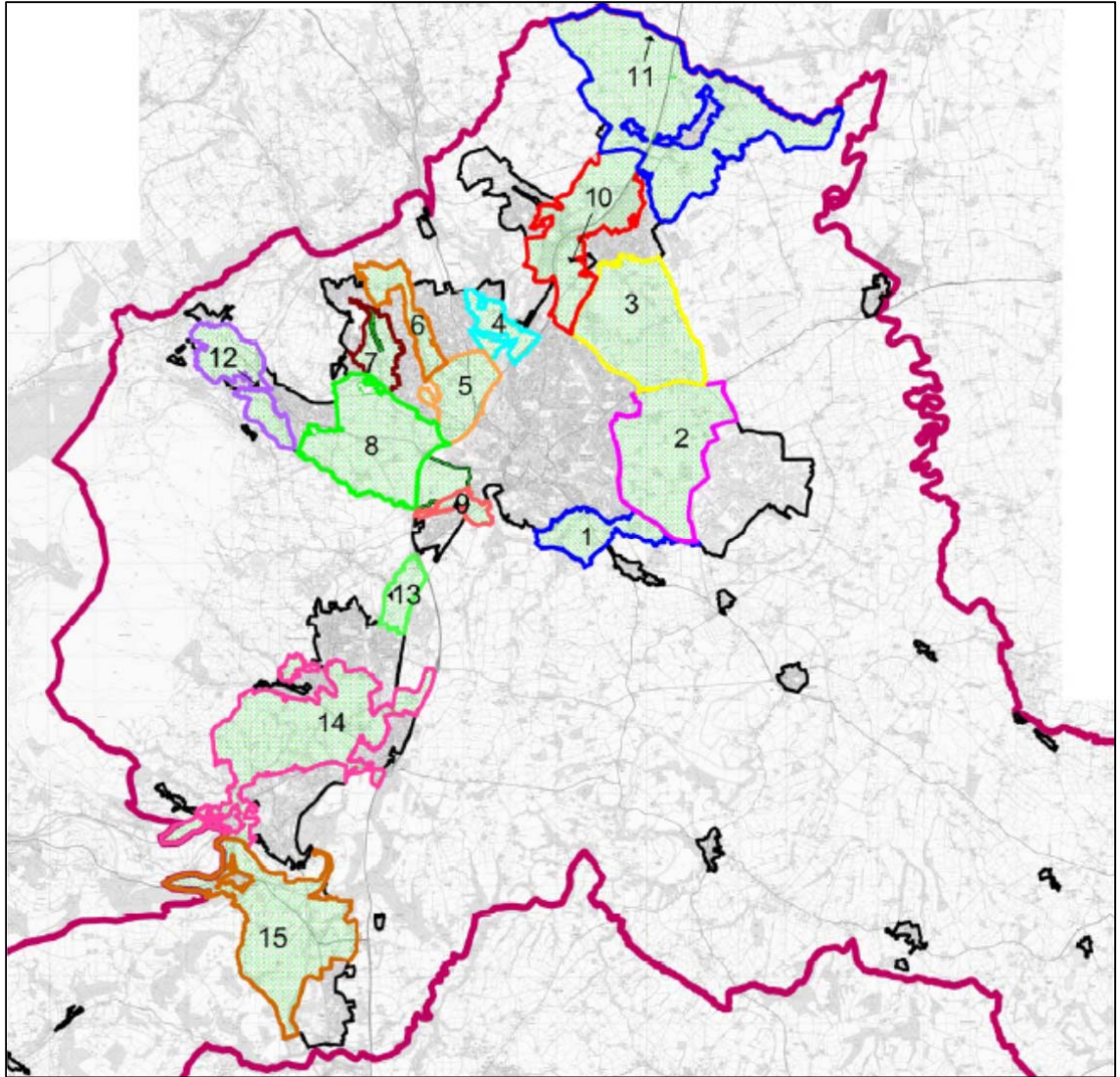
- Importantly, no fundamental objections to the overall methodology used to assess the UDP green wedge were received.

4.1 As stated in the introduction, the study was split into two stages. Stage 1 considered the areas surrounding Wrexham Town and the western villages (area to the west of Wrexham town, which comprises a number of villages in close proximity), and the second stage reviewed the remaining areas.

- this is the area where there is the most development pressure (as demonstrated by the number of candidate sites in the area);
- this area is most densely populated with settlements in close proximity to one another, which are at greater risk of coalescence should development occur;
- the presence of a number of potential Key Strategic and large sites in the area which are currently allocated as green wedge required review to assess their contribution towards the purpose of the green wedge designation;
- to allow consultation on the methodology undertaken for stage 1 to form part of the Preferred Strategy consultation, allowing officers to assess the robustness of the approach prior to rolling out the methodology for the rest of the County Borough and amending stage 1 if necessary; and;
- due to the timescales associated with the delivery agreement it was considered appropriate to concentrate on the stage 1 area initially.

4.2 To make the assessment process manageable, land in the green wedge was split into logical parcels of land, where possible, run along clear boundaries such as roads. The work is predominantly desk based, utilising secondary source material and information gathered on site visits.

Map 1: Review Area (Existing UDP Green Barrier)



The assessment is split into the following sub areas:

- Area1: Wrexham south
- Area 2: Wrexham east
- Area 3: Wrexham north east
- Area 4: Land between Bradley, Rhosrobin and east of Gwersyllt
- Area 5: Land South of Gwersyllt
- Area 6: Moss Valley
- Area 7: Land between Broughton, Brymbo and Southsea
- Area 8: Land east of Coedpoeth and south of Broughton and Southsea
- Area 9: Land South of Ruthin Road
- Area 10: Land between Gresford, Llay and Wrexham

- Area 11: Land between Gresford, Rossett, and Pulford
- Area 12: Land between Coedpoeth, Minera and Bwlchgwyn
- Area 13: Land between Rhostyllen and Johnstown
- Area 14: Land Between Penycae, Ruabon, Rhos and Cefnmawr
- Area 15: Land between Chirk, Pentre, and Froncysyllte

4.3 The intention of the site visits was to allow collection of more detailed information based on identified indicators which link to the purpose of green wedge as set out above (para 3.4). The indicators, and justification for using them, are outlined in the matrix in table 1 below.

4.4 Each sub-area is assessed against the extent to which the different purposes of green wedge designations are fulfilled (using the indicators outlined). A conclusion for each area make recommendations as to whether the designation should be retained, amended or deleted. Where candidate sites are present in an area these have been assessed for their contribution to the functioning of the green wedge. Only those candidate sites, which were considered to have potential merit for inclusion in the deposit LDP, were assessed (see candidate site register for additional information on the approach taken to the assessment of candidate sites).

Table 1: Green Wedge Indicators		
Planning Policy Wales Purpose	Characteristics of the area that contribute to the purpose of the Green Wedge	Purpose of the information
Prevent the coalescence of large towns and cities with other settlements	Barriers What are the current barriers that make up the edges of the green wedge? Barriers can be man-made or natural and include rivers, roads, trees, hedgerows. Topography can also act as a barrier.	Development Barriers – Roads, rivers and railway lines of a certain size can represent physical barriers between settlements reducing, or sometime precluding, the possibility of development and/or coalescence.
	Physical Connection of Settlements Would development of the area / site lead to the physical connection of 2 or more settlements? Most relevant to areas that contain candidate sites (individually or cumulatively). However even in areas which do not contain candidate sites, this still gives an indication regarding the role of the area in the avoidance of coalescence between settlements.	If development would lead to the merging of 2 settlements then the purpose of preventing coalescence would not be met and the green wedge serves a purpose which remains relevant for inclusion in the LDP.
	Existing Development What development currently exists in the area of green wedge, including road linkages and other urban elements? Does the area have certain urban characteristics? What is the nature of the urban edge?	Road linkages – Roadsides are potentially suitable locations for development and, where there are direct road linkages between the closest edges of the settlements, development along them would make the boundaries more vulnerable. Direct road linkages also reduce the travelling distance between settlements which psychologically reduces the distance between them. The presence of road linkages in existing green wedges increases the effect outlined above. Urban elements within the area - Existing development of an urban nature (i.e. residential) between settlements automatically reduces the distance between them and places more pressure on the boundaries.

	Topography Does the topography of the area serve a purpose in the avoidance of coalescence between settlements?	Topography can impact the openness of an area, and can also act as a defensible barrier.
	Openness How open is the area? This may be influenced by topography, built development, trees and hedgerows.	If the area of green wedge has a sense of openness it serves an important role in maintaining a gap between settlements, and avoiding the coalescence of settlements.
	Candidate Sites Are there candidate sites present in the area of green wedge?	Candidate site submissions reflect an aspiration to develop. Where these are located between settlements they increase the vulnerability of the boundaries. Consideration should be given to the contribution the area covered by the candidate sites submission makes to the green wedge both alone and in combination (cumulative impact) with other sites.
Manage urban form through controlled expansion of urban areas	Ribbon development Ribbon development is building along the routes of communications radiating from a settlement, primarily along roads. Does the area of green wedge contain ribbon development?	If ribbon development is present there is potential for unrestricted sprawl.
	Isolated development (Candidate Site Specific) This is development specific and relates to the assessment of candidate sites in the green wedge.	If yes, result would be isolated development, with a high potential for urban sprawl.
	Well connected Two or more boundaries with the built up area.	If a site/area is well connected i.e. has several boundaries with the adjacent urban area, lower potential for urban sprawl. If only one boundary with existing urban area, development would 'jut out' or not be as well related and has more potential to result in urban sprawl
	Round off the settlement pattern (Candidate Site specific)	If development would 'round off' the settlement pattern there is low potential for unrestricted sprawl.

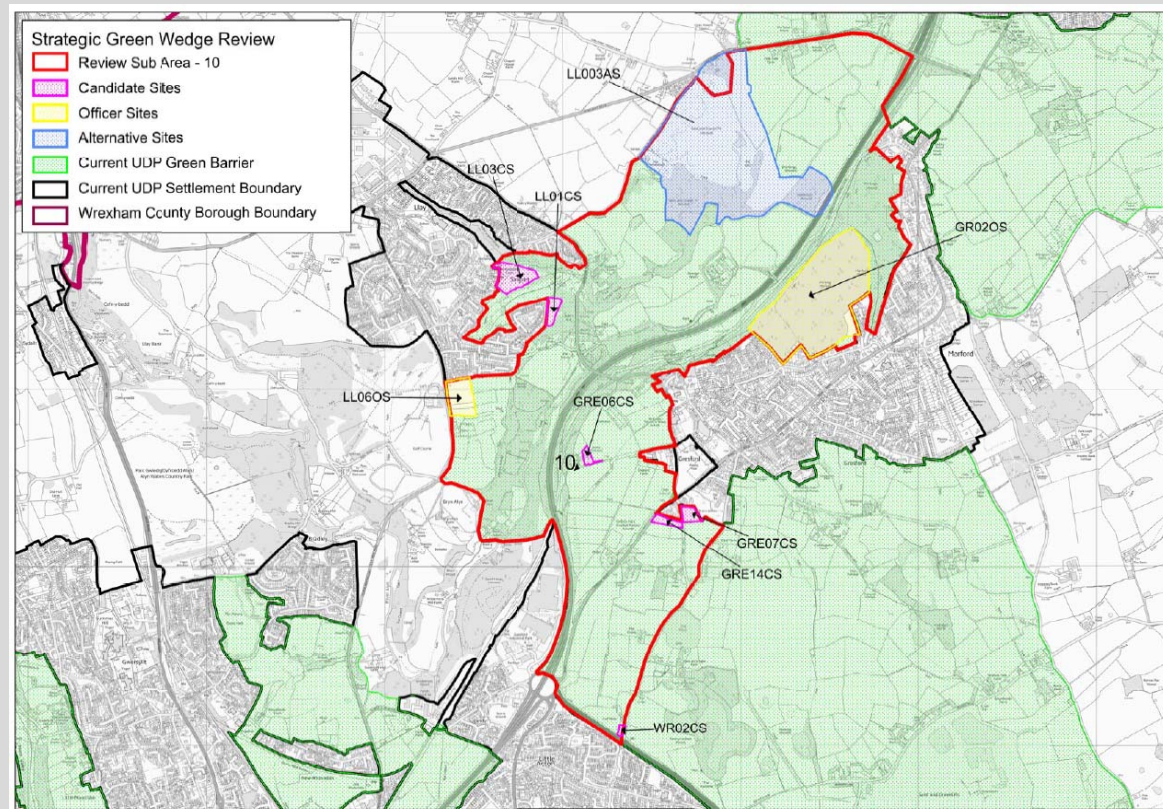
	Provide a good existing barrier Which if lost would result in urban sprawl.	If yes, higher potential for urban sprawl.
Assist in safeguarding the countryside from encroachment.	Defensible Boundary Is there a strong, defensible boundary between the existing urban area and the site – wall, river, main road etc (as opposed to garden boundaries)?	If there is an existing defensible boundary between the existing urban area and the green wedge/ candidate site, it performs a role in safeguarding the countryside from encroachment
	Other countryside characteristics This relates to the character of the area covered by the green wedge, including nature conservation areas, public rights of way, woodland, and the grade of agricultural land.	If the area includes these characteristics then the Green wedge assists in safeguarding the countryside from encroachment. .
	Existing Buildings (Candidate Site Specific) Does the site contain buildings?	If the site/area contains buildings that are not in agricultural / forestry use, development (on that part of the site) would be classed as brownfield rather than Greenfield development, so the site would not perform a role in safeguarding the countryside from encroachment. Notwithstanding this, development could still impact the openness of the area.
Protect the setting of an urban area.	Proximity to Area of Built Heritage/ Perform a specific role in the setting of an urban area Adjacent to a conservation area, listed building, historic park or garden or other features of historic significance. Does the area provide a landscape setting for an adjacent urban area?	Where a site is adjacent to such a feature, development may still be able to preserve the setting and special character if done sensitively through appropriate design. It may also play a role in relation to the overall setting of an urban area.
Assist in urban regeneration by encouraging the recycling of derelict and other urban	Settlement Limits This is controlled by settlement limits and the principles of Planning Policy Wales in relation to the preference for the reuse of land. It is recognised that there is not enough previously developed land in the County Borough to accommodate the development required for the	N/A

land.	LDP period. The other considerations in the assessment will help inform which areas of green wedge should be retained.	
N/A	Other Designations Other Designations in the area e.g. AONB, WHS, etc.	In cases where other planning and development management policies provide the necessary protection, it may be unnecessary to also allocate the area as green wedge.

- 4.5 Each area will be assessed against the extent to which the different purposes of green wedge designations are fulfilled (using the indicators outlined). The conclusion for each area makes a recommendation whether the designation should be retained, amended or deleted.
- 4.6 The matrix above includes candidate site specific questions. As candidate sites generally make up smaller parts of a larger area of green wedge, they will be assessed separately; however they will form part of the overall conclusion for each sub-area. The assessment will need to consider the role that the area being promoted as a candidate site plays in the overall function of the green wedge. Candidate sites can be assessed individually or in combination where there is a concentration of sites in an area.
- 4.7 The review does not make a judgement about the relative importance of the various purposes of green wedge, and aims to consider them all in the round.
- 4.8 The conclusion outlines which of the functions, based on the purposes set out in national policy, the area as a whole performs, and if the overall principle of the designation in the area is necessary.

Area 10: land between Gresford, Llay and Wrexham

Area 10: land between Gresford, Llay and Wrexham



Description	The area sits between the settlements of Llay and Gresford, and surrounds a corridor of land that contains the A483 and the Wrexham to Shrewsbury railway line. The area contains the River Alun, and the section of Green Wedge between Llay and Gresford contains the wooded Alun river valley, beyond this towards the north east the land becomes flatter and more open. The area also contains a large sand and gravel quarry.
Planning Policy Wales Purpose	Green Wedge characteristics of the area
Prevent the coalescence settlements	Barriers The south eastern boundary of the Green Wedge comprises part of the B5445 and the existing settlement edge of Gresford. The western boundary comprises of the B5425 and Lon Pont y Capel. The boundary to the north west includes the existing settlement edge of Llay and Gegin Lane and the B5102. The roads, which form part of the boundary, are considered to represent clear defensible boundaries. There are, however, sections where the boundary of the area is formed by domestic curtilages that are considered less defensible. It is noted that along parts of the existing settlement edges (south east edge of Llay around Gresford Road) the topography of the river valley could act as a barrier to development; however there is still extensive sections of the existing settlement edge that may be prone to erosion as is often the case in urban-rural fringe areas. It is noted that erosion of domestic edges would only contribute to coalescence of separate built up areas that are already in close proximity to each other. Physical Connection of Settlements The area does sit between three settlements (Wrexham town, Llay and Gresford). The distance, at its narrowest, between Llay and Gresford is approximately 0.7 km (0.4 miles), and the distance, at its narrowest, between Wrexham town and Gresford is approximately 0.63 km (0.39 miles). Existing Development Road Linkages: A dual carriageway and a railway line runs through the area (north south) and it is also criss-crossed by a number of smaller roads.

Urban Elements within the Area: The area is strongly influenced by the transport corridor formed by the dual carriageway and railway line, and the presence on its edges of Llay and Gresford. Within the Green Wedge there is a sand and gravel quarry and a water treatment works.

Topography

The topography of the area is characterised by the Alun river valley and the gently undulating lowland plateau. The area of river valley between Llay and Gresford in particular is characterised by steeper topography and more tree cover.

Openness

The undulating areas comprising agricultural fields and field boundaries (for example areas to the west of the B5373 at Gresford and areas adjacent the River Alun which run parallel to the A483) have an open aspect (see photos 1 and 2), affording wider views and an overall sense of openness. The river valley, which includes steeper topography and more tree cover, is less open (see photo3).



Looking west of the B5373 (Clappers Lane) at Gresford.



Looking south west from junction of B5102 and A483 (Alun river valley) .



View from Gresford Road at bridge over the A483.

Candidate Sites

	The area contains 5 candidate sites. Two sites (LL003AS and GRE006AS) were submitted as alternative sites. Neither was considered as having sufficient merit for further consideration. Of the original candidate sites only one (LL06OS) was considered as having merit following the candidate site assessment. It would have a localised impact on existing defensible barriers, and lead to encroachment into the countryside. It would not undermine the function of Green Wedge at a wider scale. The site has not been put forward as a draft allocation (either as an A or B site) at this stage.
Conclusion The designation in this area contains characteristics that serve the purpose of avoiding coalescence, including the presence of favourable topography and the existing green wedge being designated along defensible boundaries. The area of green wedge sits between Wrexham town, Gresford and Llay. Elsewhere there is sporadic residential and agricultural development. In certain parts of the designation the issue of coalescence is more relevant. In particular the area which sits between Wrexham town and Gresford. This area has an open aspect, and there is development along the B5445 (including the Premier Inn complex and the Wrexham FC training ground). Whilst there is no direct inter-visibility between the edges of Wrexham and Gresford the flat topography, open aspect affording wider views, direct road link and development along part of the road do create a limited sense of separation between the settlements. In the area between Llay and Gresford the presence of the A483 and Shrewsbury-Chester railway line acts as a barrier, and the steeper topography act as a potential barrier to development. However, there is still potential for the gap, where the two settlements come into closest proximity, to come under pressure from development.	
Manage urban form through controlled expansion of urban areas	Ribbon development None present.
	Provide a good existing barrier As described above the area of green wedge has a mixture of boundary types. The roads, which form part of the boundary, are considered to represent clear defensible boundaries. There are, however, sections where the boundary of the area is formed by domestic curtilages that are considered less defensible. There are also some areas along the river valley where the topography acts as a barrier.
Conclusion The area is partially set along defensible boundaries including roads and partially along existing settlement boundaries. The large area of existing settlement boundary bordering the area of green wedge can result in the erosion of these boundaries as is often the case in urban-rural fringe areas. The designation does, therefore, perform a role in managing the urban form in this location. Furthermore it creates a definite break in the built form between Gresford and Wrexham town along a main route (B5445).	

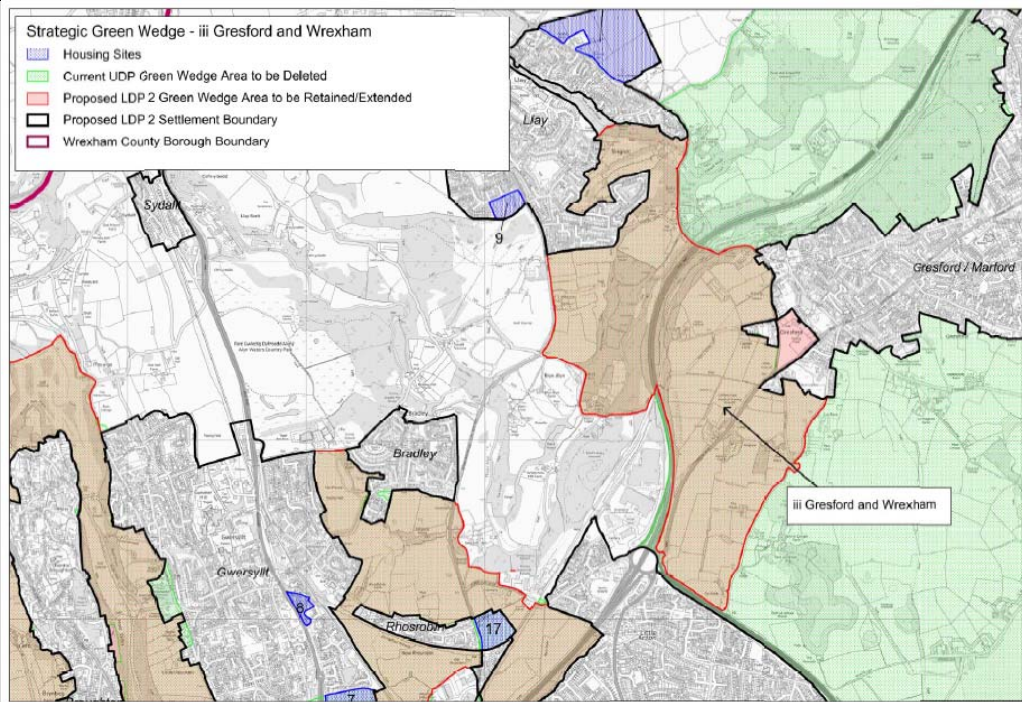
Assist in safeguarding the countryside from encroachment	Defensible Boundary The roads, which form part of the boundary, are considered to represent clear defensible boundaries. There are, however, sections where the boundary of the area is formed by domestic curtilages that are considered less defensible. There are also some areas along the river valley where the topography acts as a barrier. These boundaries assist in protecting the open countryside from encroachment. Other countryside characteristics The area contains the Marford Quarry SSSI, TPO woodland, and local wildlife sites.
Conclusion The designation does assist in safeguarding the countryside from encroachment. The key characteristic that achieves this purpose is the defensible boundary along which the designation is set. However this could be achieved via an open countryside policy designation.	
Protect the setting of an urban area	Proximity to Area of Built Heritage The Gresford and Marford designated Conservation areas sit partly within and abut the Green Wedge.
Conclusion The green wedge sits adjacent locally designated conservation areas, and therefore serves to protect the setting of those designations. However, separate built environment legislation makes provision for the protection of the setting of conservation areas. This could be further strengthened by an open countryside policy.	
Assist in urban regeneration by encouraging the recycling of derelict and other urban land Settlement Boundaries - This is controlled by settlement boundaries and the principles of PPW in relation to the preference for the reuse of land.	
N/A	Other Designations / Relevant Planning History Part of the area is covered by a Special Landscape Area (apart from the area to the east adjacent Cefn Road). The area contains the Marford Quarry SSSI, TPO woodland, and local wildlife sites. No relevant planning history.
Overall Conclusion All the settlements that border the green wedge are in close proximity to each other (Wrexham, Gresford and Llay). The function of preventing coalescence is more relevant in the area sitting along the B5445 between Wrexham and Gresford. Whilst there is not direct inter-visibility between the edges of Wrexham and Gresford the flat topography, open aspect, direct road link and development (including the Premier Inn complex and the Wrexham FC training ground) along part of the road do create a limited sense of separation between the settlements.	

The settlements of Llay and Gresford sit in relatively close proximity to each other. The A483 dual carriageway and railway line combined potentially acts as a barrier to coalescence, however it is considered appropriate to maintain an area of green wedge where the two settlements come into closest proximity.

It is considered that there is justification for the retention of the green wedge designation along the B5445 between Gresford and Wrexham, where the impact of development upon the openness of the area would be more pronounced. The area sitting along the B5445 between Gresford and Wrexham should be retained for the purpose of retaining a gap and preventing coalescence between those settlements and maintaining the openness of the area. The A483 and Old Wrexham Road are used as the edges of the designated green wedge as they form definitive boundaries on the ground, and correspond to the areas between Wrexham and Gresford that sit in closest proximity, and which are connected by a direct road link (B5445). It is considered appropriate to maintain an area of green wedge between Llay and Gresford where the two settlements come into closest proximity for the purpose of retaining a gap and preventing coalescence between those settlements and maintaining the openness of the area (see Map 9: Proposed green wedge between Gresford, Wrexham and Llay).

In relation to the wider area to the east of Gresford road the lack of development pressure, and the fact that development in this location would be controlled by the presence of a settlement boundary along with national and local policies presuming against inappropriate development in the open countryside, there appears to be little justification to retain a green wedge in this area.

It is recommended that the area of land sitting to the east of Gresford Road (B5373) be removed from the designation. Whilst the area would no longer be designated as green wedge it would still be afforded a high level of protection from development as a result of its location outside the settlement limit (see Map 9: Proposed green wedge between Gresford, Wrexham and Llay).



Map 9: Proposed green wedge between Gresford, Wrexham and Llay

[illegible]

Description	The area of Green Wedge surrounds the settlements of Rossett and Burton, and extends to the national border with England in the north and the existing settlement edge of Gresford to the south. The area is characterised as flat rural lowland, with scattered farmsteads, villages, and sporadic development beyond the village boundaries.
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Planning Policy Wales Purpose	Green Wedge characteristics of the area
Prevent the coalescence of settlements	Barriers The north eastern boundary sits on the national border with England and a shorter stretch along the boundary with Flintshire County Council (and follows the course of Pulford Brook and Stringer's Brook). The western boundary is set along a number of country lanes. The southern boundary is set along Straight Mile (B5102) and the existing settlement edge of Gresford/ Marford. The eastern boundary comprises a mix of country lanes, field boundaries, and drainage ditches. The roads, which form part of the boundary, are considered to represent clear defensible boundaries. There are, however, sections where the boundary of the area is formed by domestic curtilages that are considered less defensible. In parts it is set along field boundaries and water courses, which are also considered defensible boundaries. It is noted that erosion of domestic edges would only contribute to coalescence of separate built up areas that are already in close proximity to each other.
	Physical Connection of Settlements The area does sit between four settlements (Gresford, Rossett, Burton, and Pulford on the English side of the border). The distance, at its narrowest, between Gresford and Rossett is approximately 0.7 km (0.4 miles). The gap, at its narrowest, between Rossett and Burton is approximately 0.16km (0.1 miles), and the gap at its narrowest, between Rossett and Pulford is approximately 0.3 km (0.17 miles).
	Existing Development Road Linkages: A dual carriageway and a railway line runs through the area (north south) and is also criss-crossed by a number of smaller roads. Urban Elements within the Area: The area is strongly influenced by the transport corridor formed by the dual carriageway and railway line, and the presence on its edges of Llay and Gresford.
	Topography The topography of the area is characterised by flat rural lowland.
	Openness The rural lowland agricultural fields and field boundaries have an open aspect affording wider views and an overall sense of openness (see photo 4).



Looking from settlement edge of Marford towards Rossett along Chester Road (B5445) to the north.

Candidate Sites

The area contains 21 sites. Five of the sites (RO02CS, RO08CS, RO11CS, RO01OS, RO02OS) were considered as having merit following the candidate site assessment process. RO02OS and RO02CS are located to the west of Rossett. Development of the sites would have a localised impact on existing defensible barriers, and lead to encroachment into the countryside. It would also reduce the gap between Rossett and Trevalyn. RO08CS is an isolated site between Rossett and Trevalyn. RO01OS is located to the east of Rossett. Development of these sites would have a localised impact on existing defensible barriers, and lead to encroachment into the countryside. It would not lead to a reduction in the gap between Rossett and any other settlements. RO02OS is located to the north of Rossett. Development of the site would have a localised impact on existing defensible barriers, and lead to encroachment into the countryside. It would lead to a reduction in the gap between Rossett and Pulford. Seven alternative sites were submitted in the area. BU001AS, GRE002AS, GRE001AS, and RO002AS were not considered as having merit for further consideration. Site RO001AS would have a localised impact on existing defensible barriers, and lead to encroachment into the countryside. The impact of site RO003AS was considered previously as it is largely aligns with site RO02OS. The impact of site RO004AS was considered previously as it is generally aligns with sites RO02CS and RO02OS. Of all the sites referenced above site, RO004AS has been put forward as a draft allocation (A list).

Conclusion

Within the designation certain areas of the green wedge appear to perform the function of avoiding coalescence. In particular the areas which sit between the settlements. The area between Marford and Rossett has an open aspect, and there is inter-visibility between the edges of the settlements. Similarly there is inter-visibility between the settlement edge of Rossett and Pulford, and the

presence of ribbon development on the western side of the road results in gap of approximately 90m between the built edge and the border with England. The direct road link also creates a limited sense of separation between the settlements. The narrow gap between Rossett and Burton is punctuated by the A483, however there is a subway under the road allowing direct access between the edges of the settlements. The designation does serve to maintain a sense of openness between the settlements edges sitting in close proximity to each other. There is inter-visibility between the eastern edge of Rossett and the area of Trevalyn which comprises ribbon development along Harwood Lane, and therefore the designation serves to serve a similar purpose to the areas identified above.	
Manage urban form through controlled expansion of urban areas	Ribbon development There are examples of ribbon development along Harwood's Lane (the area of Trevalyn), and along Chester Road to the north of the settlement edge of Rossett.
	Provide a good existing barrier The roads that form part of the boundary are considered to represent clear defensible boundaries. There are sections where the boundary of the area is formed by domestic curtilages, these are considered less defensible. There are also some areas of boundary along water courses and field boundaries. These tend to be considered defensible boundaries.
Conclusion The area is partially set along defensible boundaries including roads and partially along settlement boundaries. The large area of settlement edge (Gresford, Rossett and Burton) bordering the area of green wedge can result in the erosion of these boundaries as is often the case in urban-rural fringe areas. The designation does, therefore, perform a role in managing the urban form in this location. Furthermore it creates a definite break in the built form between Rossett, Gresford, and Pulford along a main route (B5445), and between Rossett and Burton along the section of road linking with the underpass underneath the A483. Retention of the area between Rossett and Pulford would also tie into the North Cheshire Green Belt as shown in the key diagram of the Cheshire West and Chester Local Plan (Part One). It may also play a role in the management of ribbon development in the Trevalyn area.	
Assist in safeguarding the countryside from encroachment	Defensible Boundary The roads that form part of the boundary are considered to represent clear defensible boundaries. There are sections where the boundary of the area is formed by domestic curtilages, these are considered less defensible. There are also some areas of boundary along water courses and field boundaries. These tend to be considered defensible boundaries.
	Other countryside characteristics The area contains local wildlife designations, and group and individual TPOs.

Conclusion The designation does assist in safeguarding the countryside from encroachment. The key characteristic that achieves this purpose is the defensible boundary along which the designation is set. However this could also be achieved via an open countryside policy designation.	
Protect the setting of an urban area	Proximity to Area of Built Heritage Part of the Rossett Conservation Area is located within the Green Wedge. The Trevalyn CADW Registered Park and garden is located within the existing designation.
Conclusion The green wedge sits adjacent to a locally designated conservation area and a CADW registered Park and Garden, and therefore serves to protect the setting of that designation. However separate built environment legislation makes provision for the protection of the setting of conservation areas and registered parks and gardens. This could be further strengthened by the introduction of an open countryside policy designation.	
Assist in urban regeneration by encouraging the recycling of derelict and other urban land Settlement Boundaries - This is controlled by settlement boundary and the principles of PPW in relation to the preference for the reuse of land.	
N/A	Other Designations / Relevant Planning History The majority of the area is covered by a Special Landscape Area. The SLAs are being reviewed as part of the LDP process. The area contains TPO woodland, and local wildlife sites. Relevant planning history: P/2016/0712 O/A to erect 47 dwellings on land off Darland Lane And Gamford Lane (refused) (02/02/2017). P/2014/0292 Erection 15 dwellings Rosemary Nurseries, Burton Hall Road, Burton (granted) (19/12/2014). P/2015/0699 Outline Planning Permission For The Erection Of 19 Dwellings North Of Burton Road, Burton (refused) (07/12/2015).
Overall Conclusion The area of green wedge surrounds the settlements of Rossett and Burton, and extends to the national border with England in the north and the existing settlement edge of Gresford to the south. The area is characterised as flat rural lowland, with scattered farmsteads, villages, and sporadic development beyond the village boundaries. There is direct inter-visibility between the edges of Marford and Rossett, and Lavister and Pulford, and the topography, open aspect, and direct road link create a limited sense of separation between the settlements. Overall it is considered that there is justification for the retention of the green wedge designation along the B5445 between Gresford, Rossett and Pulford, where the	

risk of coalescence and the impact upon the openness of the area are more pronounced. Retention of the area between Rossett and Pulford would also tie into the North Cheshire Green Belt as shown in the key diagram of the Cheshire West and Chester Local Plan (Part One).

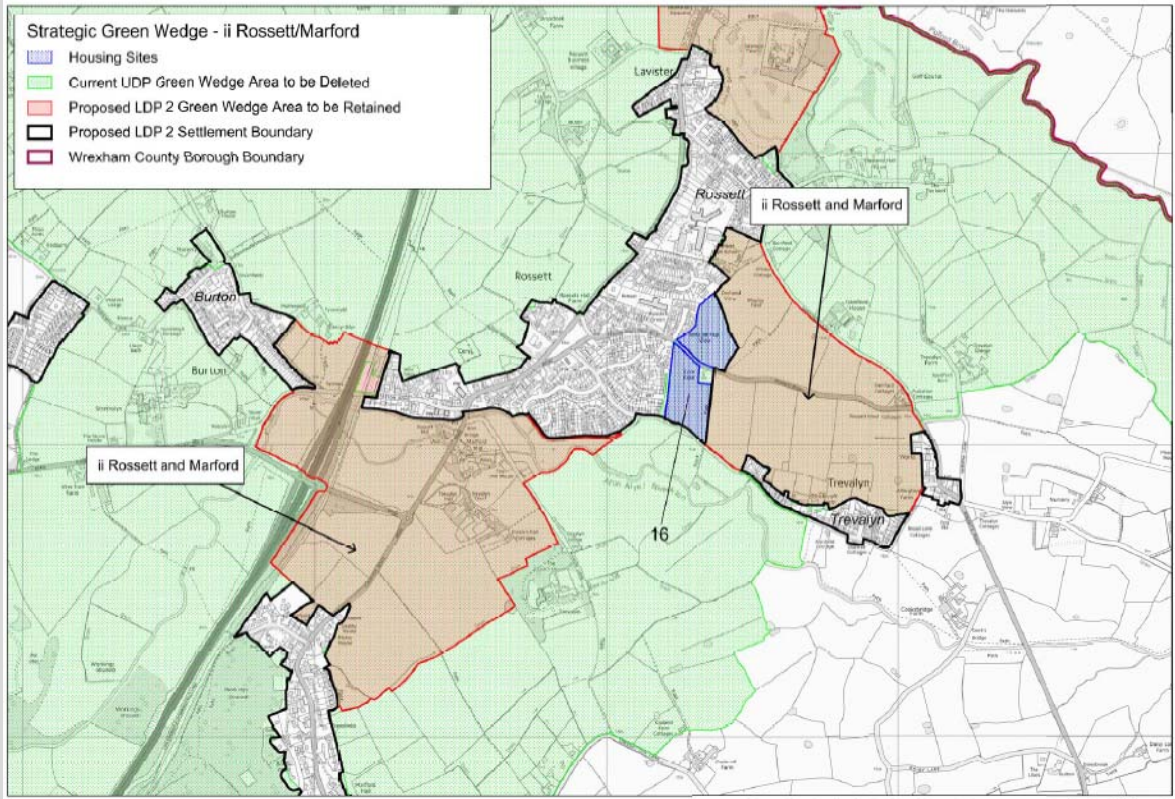
The narrow gap between Rossett and Burton does serve to maintain a sense of openness between the settlements edges sitting in close proximity to each other. The designation is set along defensible boundaries, serving to manage the urban form in these locations. Development beyond the road would lead to a discordant urban/rural fringe lacking a clear boundary. The green wedge in this location also serves to avoid encroachment into the countryside in an area of development pressure (2 candidate sites have been submitted in this area). An area between the eastern edge of Rossett and Trevalyn (where there is inter-visibility between the edge of Rossett and ribbon development along Harwood Lane) serves the function of avoiding coalescence between two areas of residential development.

Conclusion: In order to take these factors into account, it is recommended that the overall principle of retaining the green wedge in the area is appropriate; however amendments to the designation to accommodate the allocation of site H1(16) Land north and south of Rossett Road, Rossett. The area sitting along the B5445 between Gresford, Rossett, and Pulford, and the areas between Rossett and Burton and Rossett and Trevalyn, should be retained for the green wedge purpose of preventing coalescence between those settlements and assisting in safeguarding the countryside from encroachment (see Map 9: Proposed green wedge between Gresford, Rossett and Pulford).

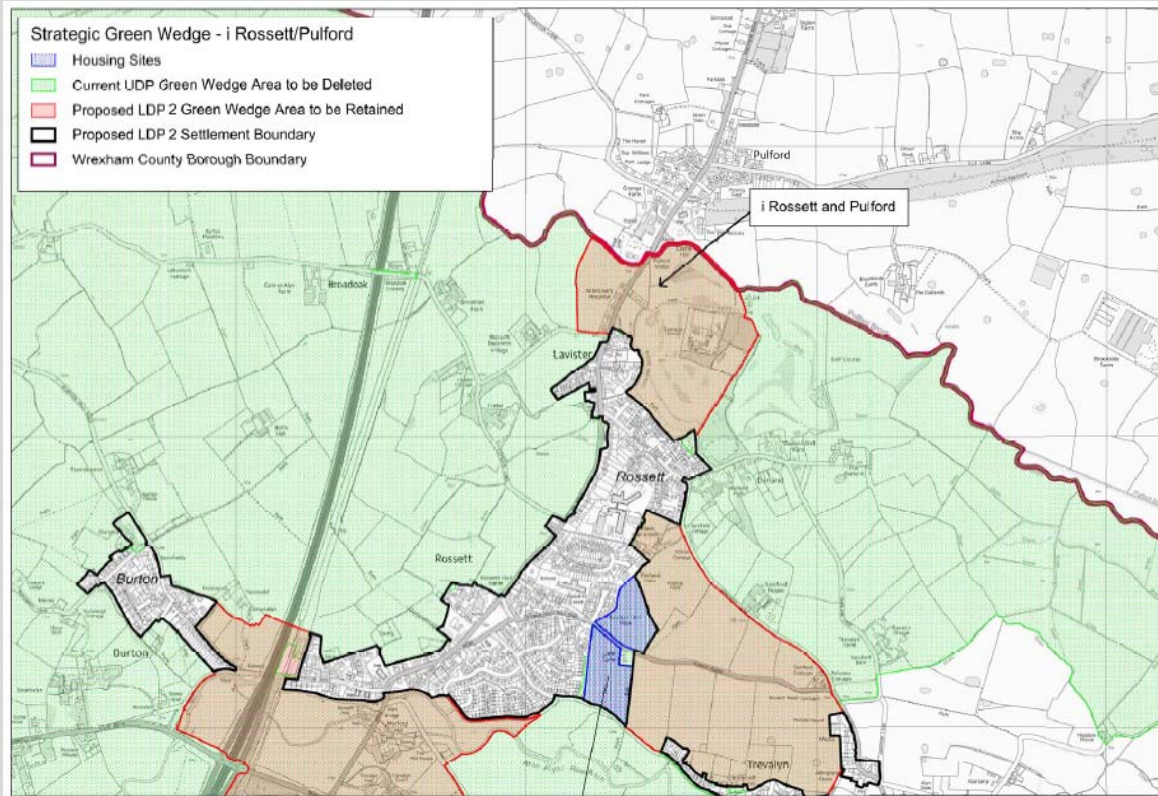
The areas of greenwedge that covers open countryside, and which do not sit between settlements in close proximity, do not serve the same purpose as identified above.

Conclusion: It is therefore recommended that these areas be removed from the designation. Development in these locations would be controlled by the presence of an existing settlement boundary along with local policies presuming against inappropriate development in the open countryside. The area no longer designated as green wedge would still be afforded a high level of protection from development considered inappropriate in the open countryside (see Map 9: Proposed green wedge between Gresford, Rossett and Pulford).

Map 10: Proposed green wedge between Gresford and Rossett



Map 11: Proposed green wedge between Rossett and Pulford



Map 17: Green Wedge Review – Proposed LDP Green Wedge Designation

