

Site of App Chem, Hugmore Lane, Llan y Pwll, Wrexham

Proposed Residential Redevelopment.

Planning, Design and Access Statement.

the
Planning
C o n s u l t a n c y

1. Introduction.

1.1. This Planning Statement is submitted in support of an application for planning and listed building consent relating to the residential redevelopment of the site of App-Chem Ltd, off Hugmore Lane, Llan y Pwll, Wrexham.

1.2. The site has an area of approximately 0.62 hectares, it is a developed site that is presently occupied by App-Chem Ltd. The application proposals seek the residential redevelopment of the site, to which there are two principle elements:

1.2.1. The range of brick built, former agricultural buildings, are proposed to have their unsympathetic extensions removed prior to restoration and conversion to provide four dwellings.

1.2.2. The remainder of the buildings on the site, comprising more recent industrial sheds, are proposed to be demolished and replaced with 12 detached, semi-detached and terraced dwellings.

1.3. The brick built buildings are considered to be listed by virtue of their historical association with the adjacent Grade 2 listed Holt Lodge Farm, consequently, there is a need for listed building consent in addition to planning permission.

1.4. This application is supported by the following reports:

1.4.1. Design and access statement.

1.4.2. Heritage statement.

1.4.3. Arboricultural report.

1.4.4. Ecological reports, including detailed bird, bat and badger investigations.

1.4.5. Marketing report.

- 1.5. The above documents are not repeated in detail in this Statement, but should be read alongside it. None of the documents identify any reason why planning permission and listed building consent should not be forthcoming.
- 1.6. The Applicant's use of the application site has reduced over recent years so that the site is significantly too large for their needs; in order to make the business run as efficiently as possible, there is a need to relocate to more suitable premises, it is presently anticipated that this will take place in March 2017 following which the premises will become vacant.
- 1.7. The premises have in fact been marketed since 2011, with the marketing agents being changed in 2013 in an attempt to give the marketing fresh impetus. However, as the accompanying marketing report explains, the marketing has not been successful with the Agents commenting that the severance of the site from Wrexham Industrial Estate, the age and condition of the buildings, and the relationship to the adjacent listed property have all combined to limit the commercial potential of the site. Continued commercial use does not appear to be a realistic prospect and, therefore, it is necessary to consider alternative uses.
- 1.8. It is our view that residential use is the most appropriate alternative. As noted above, the character of Hugmore Lane has changed markedly since the Link Road was completed with the character of land use, aside from the application premises, being almost entirely residential. Furthermore, the immediate relationship of the site to Holt Lodge Farm, the residential use of which is being consolidated through the conversion of adjacent barns, only further emphasises the appropriateness of residential use.

1.9. This Statement sets out the reasons from a planning policy point of view why the application proposals are considered acceptable.

2. Housing land supply.

- 2.1. The starting point for the consideration of this application is that the Council cannot demonstrate a five year housing land supply. As the 2015 Housing Land Monitoring Statement confirms, this is primarily because the 'present' Unitary Development Plan has time expired and in such circumstances Technical Advice Note No 1 (TAN 1) makes clear at paragraph 8.2 that authorities in such a position will not be able to undertake a land availability study and will, therefore, be considered not to have a five year land supply.
- 2.2. However, as the Housing Land Monitoring Statement again confirms, the delivery of housing in Wrexham has declined steadily over the past decade with just 235 dwellings being completed in 2014/2015, this compares to the 385 dpa average within Policy H1 of the now time expired UDP and 781 dpa within the emerging LDP Preferred Strategy. It is clear, therefore, that there is a serious shortage of housing land, both in principle and in practice.
- 2.3. In accordance with para 6.2 of TAN 1 the need to increase the housing land supply in such circumstances should be given "**considerable weight**". Whilst it would be correct to say that this does not mean that all proposals should necessarily be granted permission it is an important starting point that requires the proposal to be approached in a positive fashion.
- 2.4. During the course of pre-application discussions it was suggested on behalf of the LPA that the need to increase the land supply did not outweigh the approach of the LDP which seeks to direct development to locations within settlements. Such an approach is wrong, as recent appeal precedent demonstrates:

2.4.1. Glyn Farm, Colwyn Bay – APP/T6905/A/12/2178621.

Proposal for 39 dwellings on greenfield land beyond the settlement boundary. The most recent JHLAS concluded that Conwy had less than a five year housing land supply. The Inspector noted that, notwithstanding the fact that the site was outside the settlement boundary, it was agreed by the Council (para 17) that the proposal conformed to the development plan and basic development control principles and, consequently, as there was a shortfall in housing land

and no planning harm, permission should be granted (para 21).

2.4.2. Church Road, Llanederwyn, Cardiff – qA1022557.

The Council did not have a five year land supply which the Minister considered to be “highly unsatisfactory”. The Minister noted that the proposal would be in conflict with a range of local plan policies (para 10), but concluded that *“it would be appropriate to attach considerable weight to the need to increase the supply of housing land, and to the social and economic benefits of the proposed development. I take the view that these are compelling considerations that should outweigh the conflict with development plan policies..”* (para 56).

2.4.3. Cwmgelli, Blackwood, Caerphilly – APP/K6920/A/15/3137884.

Outline application for residential development on land that was outside the settlement and also in the Green Wedge, the Inspector noted that the development was inappropriate development in a green wedge that should only be granted in very exceptional circumstances. The Inspector noted that the site was in a sustainable location and would not cause unacceptable harm to its surroundings and that: *“there is an overriding need for this development and these factors combine to constitute the very exceptional circumstances to outweigh the conflict with national and local policies..”* (para 20)

2.4.4. Old Hall Road/Greenhill Avenue, Ewloe – APP/A6835/A/14/2220730.

Proposal for 41 dwellings adjacent to, but outside, the settlement boundary, the Inspector noted a range of UDP and National policies with which the proposal was in conflict (paras 4, 10 and 11). The Council did not have a five year land supply and the Inspector concluded that: *“...the benefits of the scheme outweigh the conflict with the development plan and one aspect of national planning policy and the balance clearly falls in favour of allowing the*

appeal such that the limited loss of Grade 3a land is not unacceptable.

2.4.5. Issa Farm, Mynydd Isa – APP/A6835/A/15/3137719.

Proposal for 59 dwellings in the open countryside, the Inspector concluded, however, that the development would not represent a significant encroachment into the surrounding countryside (para 15). The LPA did not have a five year land supply and the policy which sought to generally restrict development outside settlement boundaries in the countryside *“no longer has currency”* and was outweighed *“by the need to increase housing supply, including affordable housing, the lack of harm to the character and appearance of the surrounding area and the presumption in favour of sustainable development”* (para 18).

2.4.6. Milwr Farmhouse, Milwr – APP/A6835/A/15/3139343.

Proposal for a single dwelling on a site outside the settlement boundary. The proposal was not in accordance with policy looking to control development in the countryside, however, there was not a five year land supply and the Inspector attached considerable weight to the need to increase supply (para 11) and on the basis that there was no identified harm to the character and appearance of the area and that the location was in accordance with sustainable development principles, a decision other than in accordance with the development plan was justified (para 14).

2.4.7. Rear of Maes y Goron, Lixwm – APP/A6835/A/15/3130252.

Proposal for a single dwelling outside the settlement, the Inspector noted that the proposal did not accord with the development plan (para 5). However, there was not a five year land supply and, as there would not be any definable harm to the countryside and the site was in a sustainable location, a decision

other than in accordance with the development plan was justified (para 10).

2.5. The requirement to give “considerable weight” to the need to increase the housing land supply self-evidently implies that some policies of the development plan will need to be outweighed by the housing land issue because, if they were not, then considerable weight would not be being applied. The above does not, of course, mean that residential development on all sites will be acceptable, but, as the above appeal precedent makes clear, the fact that a site is outside the settlement boundary where development would ordinarily be located is not of itself sufficient reason to justify refusing permission and in these circumstances, as will be emphasised in the next section of this Statement, that conclusion is particularly pertinent where one is dealing with previously developed land for which no alternative user can be found.

3. Is the application site a suitable site for residential development?

3.1. Paragraph 4.9 of Planning Policy Wales (PPW) states that, wherever possible, previously developed land should be used in preference to greenfield sites. The appeal precedent listed in the previous section related to greenfield sites outside settlement boundaries, it, therefore, follows that the application site should be viewed as sequentially preferable because it is a previously developed site and, therefore, even more appropriate.

3.2. The paragraph goes on to acknowledge that not all previously developed sites will be suitable for development and gives examples where this might not be the case, however, paragraph 4.9.2 gives examples of suitable previously developed sites where their re-use will promote sustainability objectives, these include sites:

in and around existing settlements where there is vacant or under-used land, commercial property or mixed use.

The application site is directly adjacent to the settlement boundary of the Wrexham Industrial Estate which is a key element of the Wrexham urban area and, therefore, is entirely consistent with PPW policy on the use of previously developed land.

3.3. A similar approach is taken within the Council's LDP. Whilst Policy PS1 seeks to direct development to within defined settlement limits or employment areas (and, as noted above, the application site is quite literally a matter of a few metres from the settlement limit), Policy PS3 indicates that development should use previously developed land in preference to greenfield sites. Once again, the application site should be viewed as an appropriate site.

3.4. It is clear that the previously developed status of the application site is a key element of making it a sustainable location for development, but in addition a regular hourly bus service is available at the junction of Hugmore Lane with the

A525, linking the site to Wrexham Town Centre (and Nantwich in the other direction). In addition, a cycleway starts within just a few metres of the application site, linking the site to the Industrial Estate and to the Town Centre, the location is, therefore, one that encourages the use of non-car modes of transport to access facilities.

3.5. Paragraph 4.6 of Technical Advice Note 23 seek to protect employment sites except where at least one of a number of criteria apply:

3.5.1. *Poor prospects of being re-occupied for their previous use* – The marketing campaign confirms that there is little likelihood of the site being re-used for employment.

3.5.2. *The particular market is over supplied* – The marketing campaign, plus the Council's own industrial land database indicate that this is the case.

3.5.3. *Other priorities such as housing need override more narrowly focussed economic considerations* – Housing need is clearly a factor to which considerable weight must be given in this instance.

3.5.4. *Land of equal or better quality is made available elsewhere*- The employment land database, together with the proximity of the Industrial Estate demonstrate that this is the case.

3.5.5. It is clear, therefore, that the application proposal satisfies several of the criteria which justify the release of employment land. The UDP has no policy that restricts the redevelopment of employment land.

3.6. For the above reasons, it is concluded that the application site is a suitable site for residential development, in line with both National and Local policy in relation to the use of previously developed land and the location of development; this would

be the correct conclusion even if there wasn't also a housing land supply issue adding greater weight to the grant of permission.

3.7. Finally, in order to further emphasise the above, the LPA have recently granted the following planning permissions for residential development on Hugmore Lane:

3.7.1. Holt Lodge Farm – conversion of two barns ref: P/2014/0511.

3.7.2. South of Long Meadow – detached dwelling ref: P/2012/0537.

3.7.3. North of Long Meadow – two dwellings ref: P/2014/0930.

3.8. It is of particular note that not only are the latter two permissions on greenfield land and, therefore, sequentially less preferable than the application site, but they are also within the Green Barrier. These decisions underline the conclusion on behalf of the LPA that Hugmore Lane is an appropriate location for residential development and it would clearly be wholly inconsistent were the LPA to now conclude otherwise in relation to the application site.

4. Design approach.

- 4.1. In considering how best to redevelop this site, the starting point has been to address the issues associated with the listed buildings in the most appropriate fashion.
- 4.2. As noted above, the brick built range of buildings along the northern boundary of the application site are regarded as curtilage listed buildings in association with the adjacent Holt Lodge Farm (grade 2). The more recent industrial buildings on the site, which are attached to the listed buildings are not considered to be of any merit and, consequently, the application proposes their demolition.
- 4.3. The Heritage Assessment should be referred to for information in relation to the evaluation of the listed building. However, the key significance of the listed buildings is not in relation to the application site, but, rather, in relation to the way in which the rear elevations which have remained substantially in their original form, relate to the courtyard of Holt Lodge Farm. In identifying a new use for the buildings, the proposals would safeguard their continued contribution as part of the Holt Lodge Farm development, the elevation would remain as existing.
- 4.4. Within the application site, the listed barns have been subjected to considerable alteration which has greatly diminished their merit. The original main elevation at ground level has been largely removed, opening up the original building into a single storey 'lean to' structure that has been added along the full frontage. The resulting appearance of the building and the internal layout, particularly at ground floor level, retains almost nothing of the original character of the structures and is of no significant merit.
- 4.5. Nevertheless, the design approach has acknowledged the need to retain and enhance this building as part of the redevelopment of the site. It is proposed that the single storey 'lean to' structure will be demolished and a new ground floor

elevation constructed on the original line out of reclaimed brick, in so doing, the basic form of the original building will be reinstated. Whilst recognising that, of necessity, the ground floor elevation is almost entirely new, the design approach has, nevertheless, sought to introduce traditional arched heads to the openings, reflecting the character of the openings on the rear elevation and which would presumably have existed on this elevation as well. At the first floor level, providing natural light to, and an outlook from, the bedrooms has, of necessity required the insertion of a small number of new openings, these have been designed to match the existing openings. Natural light to hallways has been provided by the use of conservation style rooflights.

- 4.6. It is inevitable in this case that the resultant dwellings cannot be provided with private rear garden areas, nevertheless, the proposals provide each of the properties with individual garden areas to the frontage within which parking areas would also be provided; as these areas would be forward of the principal elevation, there would be no permitted development rights for sheds etc that might otherwise disrupt the setting of the listed building.
- 4.7. It is clear that the above approach would significantly enhance the appearance of these listed buildings.
- 4.8. Having devised a scheme for the conversion of the listed buildings, the land required in order to undertake these works, plus the need to provide for access, has a strong influence on the form of the remainder of the proposed development. As noted above, the proposal to demolish the remainder of the existing buildings on the site allied to the design of the main access results in built development being pulled away from the listed buildings, the effect of this is that not only is their appearance enhanced, but their setting is also significantly improved.
- 4.9. It is proposed to build a total of twelve new build properties on the remainder of the site comprising terraced two and three bedroomed properties, semi-detached

four bedroom properties and detached three bedroomed properties (dormer bungalows). In total, including the conversion, the development would provide 4 two bedroomed dwellings, 8 three bedroomed dwellings and 4 four bedroomed properties. The proposals, therefore, include a good mix of property to, hopefully, appeal to as broad a range of people as possible.

4.10. The provision of two terraced blocks of properties facing onto Hugmore Lane on the frontage of the site would ensure that the site presents an active frontage which would be a significantly more positive element in the streetscene than the present industrial building and large parking/servicing areas to the industrial buildings.

4.11. Buildings to the rear would be largely screened from view from public viewpoints, however, it is envisaged that the use of different designs and common materials would result in a development with an appropriate and attractive balance between variety and identity as a single development.

5. Access considerations.

5.1. Reference has already been made to the following:

5.1.1. The site is situated in very close proximity to the Wrexham Industrial Estates which can be accessed either by foot or bicycle.

5.1.2. A cycleway linking the site to the Industrial Estate and, ultimately through to the Town Centre leads off the end of Hugmore Lane, just a few metres from the application site.

5.1.3. A bus stop is available at the junction of Hugmore Lane with the A525, providing a regular service into Wrexham (and to places on the route to Nantwich in the opposite direction).

5.2. It is clear, therefore, that there are good opportunities for potential residents of the development to use alternative means of transport, other than the private car.

5.3. However, recognising the fact that the site is an existing developed site, it is clear that it will generate vehicle movements whatever use it is ultimately put to (albeit that it has not proved possible to find any alternative user). The existing buildings include just over 2000 square metres of industrial floorspace which, if fully occupied, would generate significant vehicle movements, especially during peak hours as employees either arrived or left work; in addition, it is likely that such a use would generate significant levels of commercial traffic throughout the working day.

5.4. By contrast the application proposal might be expected to generate of the order of 0.8 vehicle movements per dwelling in the peak hour – suggesting a peak hour flow of just thirteen vehicles or one every 4.5 minutes, this would be of no consequence in terms of altering the scale or character of vehicle activity on Hugmore Lane.

5.5. Therefore, insofar as one might wish to limit vehicle movement in association with the use of the application site, given that it is already developed, then it is clear that residential redevelopment is one of the uses, if not the use, most likely to limit overall traffic generation. This is a further factor that weighs in favour of the application proposal.

6. Conclusions.

- 6.1. In the absence of a five year housing land supply, the additional dwellings arising from this proposal should be afforded considerable weight in the balance of planning considerations in relation to this proposal.
- 6.2. The application site is a previously developed site which both National guidance and Policy PS3 of the UDP indicate should be used in preference to greenfield sites for development.
- 6.3. It is clear from the marketing campaign that has been undertaken that there is no significant interest in the site for continued employment use, and alternative use, therefore, needs to be found for the site.
- 6.4. There are no arboricultural or ecological constraints that would preclude redevelopment of the site.
- 6.5. It is clear that the proposal would safeguard the future of the curtilage listed building on the site and, indeed, enhance its character.
- 6.6. For the above reasons, it is clear that the proposal is generally consistent with both National and Local policy and should, therefore, be granted planning permission and listed building consent as a positive means of addressing the issues associated with the site as well as providing much needed housing as part of a sustainable development.