



Appendix 6
Extracts from
LDP(2) *Preferred
Strategy* - Policy
SP7 (Housing
Provision) &
Section 4.2
(Review of
Growth Options)

Wrexham Local Development Plan 2013 - 2028

Preferred Strategy



FEBRUARY 2016

housing | open space | employment | community | transport | education



6.6 A More Equal Wrexham

This section of the strategy relates to housing provision and addressing the housing needs of the population including the need to deliver market and affordable homes as well as providing accommodation for the gypsy and traveller community.

Housing Provision

The Preferred Strategy recognises that there is a limited supply of deliverable brownfield land within the County Borough. The population is projected to rise over the Plan period⁽¹²⁵⁾ and existing demand for housing, particularly affordable housing and family accommodation is high in some parts of the Borough. Furthermore parts of Caia Park and Hightown are among the most deprived in Wales⁽¹²⁶⁾ and regeneration initiatives will continue to be required to support such communities.

The strategy best meets the housing needs of the community by balancing sustainability, deliverability, viability and need while also providing infrastructure to support development and helping to deliver affordable housing. It supports the Wrexham Local Housing Strategy - Local New Housing Landscape (2013-2018) which focuses on three themes under a framework of developing sustainable communities:

- More housing more choice; (affordable housing, intermediate rental products, market housing, meeting the needs of older people, range of housing sizes and increase flexibility);
- Improving homes and communities; (improve housing quality standards, reduce fuel poverty, bring empty properties into use): and
- Better services to improve people's lives (helping vulnerable people, people with mobility issues, older people, and Gypsy & Travellers).

The Local Housing Market Assessment (March 2015)⁽¹²⁷⁾ has identified a need for 157 affordable units per annum for both social and intermediate rent tenures. The overall housing requirement will help deliver some of this need via the planning system and other delivery mechanisms, including Council initiatives such as the affordable housing project and bringing empty properties back into use, will help address any shortfall. The strategy makes provision for an element of affordable housing delivery to be provided via the planning system to partially meet the identified evidenced need.

125 Para 5.5, Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

126 <http://www.wrexhamlsb.org/wsp.htm>

127 Para 6.61 Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

Policy SP 7

Housing Provision

Provision is made for 11,715 new homes in order to deliver a requirement of 10,650 over the period 2013 – 2028.

In order to support mixed, balanced and sustainable communities, the Council will work with partners to ensure that all new residential development contributes to improving the balance of housing and meets the identified needs of the whole community. New development will be expected to:

- maximise the delivery of affordable housing where a need is identified, recognising the varying levels of development viability across the County Borough;
- contribute to redress any identified imbalance between market and affordable housing within local housing market areas;
- ensure the sustainable use of housing land, providing an efficient density of development compatible with local amenity;
- provide the required mix of housing unit types and tenures to meet the needs of the County Borough;
- make provision for specific housing needs such as student accommodation, homes for the elderly, supported accommodation, nursing, residential and extra care homes where a need is identified;
- improve the quality and suitability of the existing housing stock; and
- be of a high quality standard of design that creates sustainable, safe and inclusive communities.

Providing an appropriate supply of housing directly supports the priorities within Our Wrexham Plan, particularly 'making Wrexham a place where people can live independently and are healthy and active'⁽¹²⁸⁾.

Key to sustaining the economic prosperity of the County Borough is ensuring that a continued supply of new homes is provided to meet the needs of an increasing population.

The Plan deviates above the 2011 based Welsh Government household projections and makes provision for 11,715 new homes in order to deliver a housing requirement of 10,650 units with a 10% flexibility allowance over the Plan period.

This deviation is justified on the basis of a robust assessment of housing requirements based on the following information which is explained further in Background Paper 1: Population and Household Projections with dwelling and employment impacts (February 2016):

- Welsh Government 2011 based Population and Household projections⁽¹²⁹⁾;
- Previous Joint Housing Land Availability Studies and an assessment of past completion rates⁽¹³⁰⁾;

128 Page 6 – 8, Our Wrexham Plan (2013 – 2024), Wrexham, Local Service Board

http://www.wrexhamlsb.org/assets/pdf/lrb_plan_2013-2024.pdf

129 <http://gov.wales/statistics-and-research/local-authority-population-projections/?lang=en> and <http://gov.wales/statistics-and-research/household-projections/?lang=en>

130 <http://wrexhamldp.wrexham.gov.uk>

- Site availability⁽¹³¹⁾ and viability⁽¹³²⁾; and
- The aspirations of the Authority to continue to expand the economy within the wider regional context⁽¹³³⁾;

The housing position as of 1 April 2015 (Appendix 3) shows that there is already a number of committed new homes that have either been built, are under construction or have planning permission which contribute in part to meeting the requirement for 10,650 new homes up to 2028. There remains however a shortfall that needs to be provided for the remainder of the Plan period, a proportion of which will result in the need for greenfield sites on the edge of existing settlements to be allocated. The majority of the remaining allocations (approximately 6,740 new homes) are directed to Wrexham Town, the most sustainable settlement within the County Borough through the allocation of brownfield sites within settlements and via Key Strategic greenfield Sites for mixed use housing and community facilities. Further non-strategic sites will be identified through the Deposit Plan and an identification of the approximate level of potential allocations within each tier is identified in the reason justification for policy SP8: Location of New Development.

This policy takes account of the most up to date evidence of need from the Local Housing Market Needs Assessment LHMA (2014) which highlights that houses remain the most popular choice of most households, particularly detached and semi-detached properties, with three and four bedroom properties, and bungalows most popular overall⁽¹³⁴⁾. There is a high level of social rented/affordable housing stock in the County Borough with just over 1.4 of every 5 households renting from or in joint ownership either with the Council or some form of regulated housing provider⁽¹³⁵⁾.

The LHMA (2014) clearly suggests a need for smaller one to three bedroom properties for both under and over 65's with some three bed general needs (under 65s)⁽¹³⁶⁾. There is also a need to ensure a range of appropriate housing provision, adaptation and support for the area's older people⁽¹³⁷⁾ as it is recognised that the County Borough has an ageing population⁽¹³⁸⁾ which will lead to specific accommodation needs. The LHMA recommends that the range of housing options available to older people should be diversified, which has the potential to free-up larger family accommodation⁽¹³⁹⁾. These issues are also noted in both the local authority's Housing Strategy (2013 – 2018) and Older Person Housing Needs Study (2013)⁽¹⁴⁰⁾.

The Council must make sure that new infrastructure and community facilities are provided as part of new development were necessary. At the same time, it must make sure that any extra cost placed on developers does not render schemes to become unviable and ultimately, not delivered on the ground.

The Joint Wrexham and Flintshire Affordable Housing and Community Infrastructure Levy and Development Viability Assessment (November 2014)⁽¹⁴¹⁾ was prepared to assist in the setting of affordable housing targets and thresholds and identify the headroom for a potential CIL charge across the range of different use classes within the County Borough.

131 Sites Register (February 2016) – <http://wrexhamldp.wrexham.gov.uk>

132 Joint Wrexham and Flintshire Affordable Housing and Community Infrastructure Viability Assessment (November 2014) <http://wrexhamldp.wrexham.gov.uk>

133 Wales Spatial Plan (Update, 2008) <http://wrexhamldp.wrexham.gov.uk>

134 Paragraph 5.25, Wrexham Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

135 Paragraph 4.12 Wrexham Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

136 Paragraph 7.27, Wrexham Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

137 Para 6.45 Wrexham Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

138 Background Paper 1 : Population and Household projections with dwelling and employment impacts (March 2015) <http://wrexhamldp.wrexham.gov.uk>

139 Paragraph 4.67, Wrexham Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

140 Para 6.70 Wrexham Local Housing Market Assessment (March 2015) <http://wrexhamldp.wrexham.gov.uk>

141 Joint Wrexham and Flintshire Affordable Housing and Community Infrastructure Levy and Development Viability Assessment (November 2014) <http://wrexhamldp.wrexham.gov.uk>

This information has informed the settlement hierarchy to give a broad, strategic indication of viability levels within settlements, which has a knock on effect on the ability of an area to deliver development and associated planning gain. The study also recognises that varying development density amongst a range of other factors can have an effect on viability.

Identifying appropriate levels of housing density will differ on a site by site basis and is dependent on a range of issues such as the topography, size and constraints associated with individual sites and also the surrounding site context. The policy does not set a specific density level in recognition of these issues but it is expected that site density is maximised in order to make the most efficient use of land and be reflective of local circumstances. Densities within existing settlement limits vary between 30 – 50 dwellings per hectare on average, with higher density development within Wrexham Town and Wrexham Town Centre. Higher density developments can assist in urban and rural regeneration by increasing possible population numbers to support communities, social facilities and public transport, as well as reducing greenfield land take.

Integration with LDP Objectives, Evidence base and other topic / criteria based policies required in the Deposit Plan including SPG's:

LDP Integrated Objectives	SO1, SO2, SO3, SO5 & SO9
Evidence Base	• Wrexham Local Housing Strategy - Local New Housing Landscape (2013-2018) • Older Persons Accommodation Needs Assessment (2013) • Local Housing Market Assessment (March 2015); • Joint Wrexham and Flintshire Affordable Housing and Community Infrastructure Levy Viability Assessment (November 2014); • Candidate Site Register (February 2016)
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	• Non-strategic housing allocations in tiers 1, 2, 3, and 4; • Windfall development including small scale infill proposals; • Former Flexsys / Monsanto Site, regeneration policy; • Housing in the Countryside (infill, barn conversions, replacement dwellings and rural enterprise dwellings – TAN6); • Affordable Housing Rural Exceptions; • SPG: Affordable Housing • SPG: Development in the open countryside

Question 14

Policy SP7

Do you agree with Policy SP7?

Gypsy and Traveller Accommodation

The Council will work with its partners and neighbouring Authorities over the Plan period to ensure appropriate accommodation for Gypsies and Travellers is provided within the County Borough. In order to meet the duty identified in the Housing Act (Wales) 2014,⁽¹⁴²⁾

142 <http://www.legislation.gov.uk/anaw/2014/7/contents/enacted>

Chapter 4: Strategic Growth Options

4.1 Overview

This chapter summarises the Strategic Growth Options (the Options) that have been assessed in the formulation of the Preferred Strategy. Selecting the most suitable Option from the outset is vital as this has a direct influence upon the amount of land allocated for development within the LDP, particularly for housing purposes.

Setting a suitable level of housing and employment development over the Plan period is not a straightforward matter. The figure used in a Local Development Plan will have to be subject to a degree of judgement, giving full consideration to the policy context for setting housing requirements, demographic and development trends and other factors such as access to finance that influence future housing need and demand. As well as considering local aspirations of demand for new homes and jobs, it needs to be ensured that the final requirement is one that can be delivered.

4.2 Review of the Growth Options

An important part of the Plan making system in Wales is the need to consider different options as an integral element of Plan preparation. Different growth options have therefore been considered relating to possible future levels of growth over the Plan period⁽³⁸⁾.

These options were assessed against the key economic, social and environmental issues and drivers for the LDP (Chapter 2) and the LDP Vision and Objectives (Chapter 3). They were tested against national policy guidance and local strategies and against LDP's sustainability objectives as part of the Sustainability Appraisal (SA)⁽³⁹⁾.

Guidance states that options must be realistic and sustainable⁽⁴⁰⁾. This rules out a 'zero growth' option as people are living longer, births are increasing and due to economic progression, people will continue to migrate to the County both on a local / national level and also internationally. Indeed, migration is the main driver of population growth in Wrexham County Borough. Net migration into Wrexham County remained high even during the economic downturn seen after the 2007/08 recession; bucking national trends with the population continuing to grow⁽⁴¹⁾. The continued population growth in the County which was seen during the economic downturn supports the aspiration towards continuing growth over the Plan period as evidence suggests that economically the recession did not impact economic progress within the County Borough⁽⁴²⁾.

Given the need to ensure that only the most realistic and sustainable growth options should be used as a basis for setting growth levels in the LDP, those deemed the most appropriate were subject to consultation as part of the LDP Vision, Objectives Strategic Growth and Spatial Options which was undertaken in Spring 2015. During this consultation it was made clear that no single option was considered preferable at this stage and that the final chosen option could be one of those forming part of the consultation or a different figure depending on the balance of available evidence⁽⁴³⁾.

The following options (Table 1) are considered to be the most realistic basis for selecting the appropriate level of growth in the LDP over the period 2013 – 2028:

38 <http://wrexhamldp.wrexham.gov.uk>

39 <http://wrexhamldp.wrexham.gov.uk>

40 <http://gov.wales/docs/desh/publications/151007local-development-plan-manual-edition-2-en.pdf>

41 Growth Options paragraph 3.5 and 5.1 <http://wrexhamldp.wrexham.gov.uk>

42 Joint Wrexham and Flintshire Employment Land Review (March 2015) <http://wrexhamldp.wrexham.gov.uk>

43 Paragraph 5.4, LDP Vision, Objectives Strategic Growth and Spatial Options, October 2015
<http://wrexhamldp.wrexham.gov.uk>

Option	Level of housing and employment growth	Evidence for Option
A: Employment led Projection	About 13,010 new homes (870 dwellings a year) Approximately 8700 jobs and 61ha of employment land	Employment Land Review (2014) figure adjusted for Plan Period
B: Migration Led Projection	About 11,715 new homes (781 dwellings a year) Approximately 7550 jobs and 53ha of employment land	Background Paper 1: Population and Household Projections with Dwelling and Employment Impacts (February 2016). ⁽⁴⁴⁾
C: Migration Led Projection	About 11,030 new homes (740 dwellings a year) Approximately 6900 jobs and 48ha of employment land	2011 based WG 5 year migration (principal) household projection ⁽⁴⁵⁾
D: Migration led Projection	About 10,100 new homes (670 dwellings a year) Approximately 6050 jobs and 42ha of employment land	2011 based WG household (10 year migration) projection ⁽⁴⁶⁾

Table 1: Strategic Growth Options Considered (Including 10% contingency allowance)

Option A is a policy based projection derived from the results of the evidence base in the Employment Land Review⁽⁴⁷⁾ whilst Options B, C and D are migration driven trend based projections using variants from the Welsh Government's 2011 based projections⁽⁴⁸⁾.

Options A and B reflect the Council's aspirations for a higher level of economic growth in view of a number of factors, including:

- the Wales Spatial Plan's vision for the area⁽⁴⁹⁾;
- the priority for a strong, resilient and responsible economy within Our Wrexham Plan⁽⁵⁰⁾; and
- the need to respond to the concerns raised in circular letter (CL-01-14)⁽⁵¹⁾ with regards to the use of the 2011 based projections reflecting a poor period of economic growth being used as a basis for planning 15 years into the future.

44 Background Paper 1: Population and Household Projections with Dwelling and Employment Impacts (February 2016) – <http://wrexhamldp.wrexham.gov.uk>

45 <http://wales.gov.uk/docs/statistics/2014/140227-household-projections-2011-based-en.pdf>

46 <http://wales.gov.uk/docs/statistics/2014/140227-household-projections-2011-based-en.pdf>

47 http://www.wrexham.gov.uk/assets/pdfs/planning/ldp2/march_2015/employment_land_review_exec_summary.pdf

48 Background Paper 1: Population and Household Projections with Dwelling and Employment Impacts (February 2016). – <http://wrexhamldp.wrexham.gov.uk>

49 Page 52, WSP (2008 update) <http://gov.wales/docs/desh/publications/130701wales-spatial-plan-2008-update-en.pdf>

50 Page 6, Our Wrexham Plan (2013- 2024) http://www.wrexhamlsb.org/assets/pdf/lsb_plan_2013-2024.pdf

51 <http://gov.wales/topics/planning/policy/circularletters/2009/cl0109/?lang=en>

Both option A and B are ambitious, with option B seeking to find a balance between the employment led projection (option A) and the 5 year migration (principle) projection (option C). Option A is 18% higher than option C with option B being a 6% increase. Both option A and B require a markedly higher build rate than has been seen in the past (average 10 year completions is around 420 dwellings a year)⁽⁵²⁾ and seek an increase in the delivery of new homes in the County.

This increase in housing delivery, regardless of the option chosen will mean that greenfield sites on the edge of existing settlement limits will need to be developed to accommodate new growth. The figures identified in Table 1 already build in a 10% contingency allowance to ensure adequate flexibility is built into the emerging Plan strategy and allocations at the outset. This is to allow for any change in circumstances which may arise over the Plan period.

4.3 Consultation and collaborative working findings

The Key Stakeholder consultation (March 2015) did not produce a majority preference regarding stakeholders' favoured growth levels. Whilst the high levels of economic growth that were presented by the employment-led projection had the most support at 38% of respondents, others (28% of respondents) questioned the sustainability of this option and suggested Welsh Government's 2011-based principal projection should be the benchmark for future growth⁽⁵³⁾.

Concerns were also raised about the capacity of the development industry to deliver higher levels of growth (Option A), particularly in light of accessing finance and the limited number of historical housing completions, particularly since the recession⁽⁵⁴⁾.

As a result, the Council embarked on looking at an alternative level of growth which still remains ambitious in the light of our economic aspirations but which also recognises the concerns of stakeholders in respect of the sustainability and deliverability of option A. A new migration led projection (Option B) was produced to seek a balance between option A and C in light of the consultation findings.

4.4 Sustainability Appraisal

The consultation process findings together with the evidence base and SA/SEA have enabled consideration of the advantage and disadvantages of the options to determine the most appropriate level of growth for Wrexham County Borough.

The SA concluded⁽⁵⁵⁾ that while the preferred growth option B is less ambitious than option A in terms of providing homes and employment land/jobs, it still meets the growth aspirations for housing and employment growth over and above the starting point of the household growth projections. With a reduced land take of around 45ha it does so in ways that would be less harmful to the environment, particularly ecology, landscape, agricultural land and mineral resources. It would also have less impact than option A in terms of travel generation and carbon emissions⁽⁵⁶⁾.

The lower growth levels in option B gives greater flexibility in site selection allowing us to reduce the negative environmental impacts of growth on assets such as landscapes, heritage, natural resources, cultural and local distinctiveness.

52 Paragraph 3.22, Background Paper 1: Population and Household growth with dwelling and employment impacts (March 2015) http://www.wrexham.gov.uk/assets/pdfs/planning/ldp2/march_2015/growth_options.pdf

53 Key Stakeholder Consultation Report of Findings, July 2015 – <http://wrexhamldp.wrexham.gov.uk>

54 Key Stakeholder Consultation Report of Findings, July 2015 – <http://wrexhamldp.wrexham.gov.uk>

55 Initial Sustainability Appraisal Report (Preferred Strategy), 2015 <http://wrexhamldp.wrexham.gov.uk>

56 Initial Sustainability Appraisal Report (Preferred Strategy), 2015 – <http://wrexhamldp.wrexham.gov.uk>