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Date: 15 Sep 2016

Dear Sharon

P/2016/0630 - OUTLINE PLANNING APPLICATION (WITH ALL MATTERS RESERVED APART FROM ACCESS) FOR ROADSIDE SERVICES INCORPORATING A PETROL FILING STATION WITH ANCILLARY KIOSK, FAMILY PUB/RESTAURANT, DRIVE-THRU RESTAURANT AND ASSOCIATED CAR PARKING

LAND WEST OF WREXHAM GOLF CLUB, HOLT ROAD, LLANYPWLL, LL13 9SB

Further to our recent meeting on 9th September, this letter provides our responses on a number of points raised within the consultation responses of the Council's planning policy team.

Before responding on these points we first reiterate the background and rationale of the planning application proposals.

Rationale behind the Planning Proposal

The proposed development is what can legitimately be termed a roadside services area proposal. This is by reference to the range and quality of uses it comprises and the location of the site. Considered collectively the uses and location of the site allow the facility to serve road users. This is the key purpose of the proposed development.

At present traffic travelling north and north east from Wrexham Industrial Estate and vice versa generally would make use of the A483/A55 North Wales Expressway to access the motorway network. Currently the only roadside services providing comparable facilities to those proposed and which are located closest to the site is Chester Services on the M56. This is a much larger facility but it is approximately 23 miles from Wrexham Industrial Estate. This provides petrol filling, toilet facilities, food and drink and small scale retail uses along with a hotel parking for heavy goods vehicles (HGVs).

This is a considerable distance and one that is beyond previous guidance on the subject of what represented an acceptable gap between modern roadside services (15 miles).

Whilst there are roadside services located closer to Wrexham Industrial Estate than Chester Services; to the north of the A483/North Wales Expressway junction on Wrexham Road, the facilities provided there are very limited. For example, there is only a small historic petrol filling station and 'Spar' shop offering a small number of car parking spaces. This is located approximately half a mile from the A483/North Wales Expressway and is therefore located off this main route north and the facilities are not visible or signed from the junction. Whilst there are also other small scale facilities, for e.g., standalone Petrol Filling Stations close to this route, they are all located off the route and are therefore unlikely to be attractive, or suitable to serve traffic travelling to this part of the town or Wrexham Industrial Estate (when travelling to or from the north/north east).

The impact of this lack of provision is that traffic does not have safe and easy access to suitable facilities.

There is also the prospect that locally generated expenditure that might otherwise be retained within the County Borough is lost to existing provision some distance away.

Providing such a facility in this location would contribute towards creating facilities where they are needed and best located to meet the obvious and latent need, thus improving road safety by reducing the prospect of drivers having to drive long distances without being able to access suitable facilities, or deviating from their route in search of such facilities.

The facility would also provide employment benefits for the local area, provide facilities to serve visitors to or working at Wrexham Industrial Estate, helping to improve the attractiveness of the Industrial Estate to existing and future occupiers.

In addition to this, the proposed use will also help to serve the new Prison, HMP Berwyn, which is due to open in 2017.

Profile of the Site

In relative terms the site is small, compact and constrained. It is too small to be effectively farmed and it does not form part of an agricultural holding. It has and gives off the impression of being a site that has been allocated or intended for development. In the event it is not brought forward for development in future it will lie fallow serving no purpose. It is however, well located next to and served by a high quality access, which as we point out below was intended to be used to support a commercial use of the site. This was and has to remain the aspiration for the site since otherwise it is capable of beneficial use.

Previous Planning Application

An important material consideration is the fact that the site benefited from a previous planning permission for a hotel/leisure complex although this has now lapsed (reference APP/H6955/A/01/1060852).

These proposals comprised a 54 bedroom accommodation block with a fitness centre together with a pub/restaurant, children's playbarn and manager's flat. The application was considered at a similar time to the proposed upgrading of the A5156 and construction of the adjacent roundabout which is now open.

The design of the roundabout took into account the potential of the site for commercial development and the need to also serve Wrexham Golf Club.

Planning Policy Consultation Response;

Our letter now addresses concerns raised through the consultation response of the planning policy team. WE deal with each issued raised in turn:

Council's Comments: "Policy EC1 - The proposed development site is greenfield land and within Green Barrier where 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. The proposal would not therefore accord with Policy EC1 as development would impact upon the openness of the site, and does not fall within any of the categories outlined in the policy".

We approach this by firstly considering whether Green Barrier policy identifies the importance of and need to protect the openness and character of Green Barrier. We then consider whether the application Proposals, when considered as a whole and with regard to elements of them, would adversely affect the openness and character of Green Belt.

Paragraph 5.2 of the explanatory text to UDP Policy EC1 sets out the purpose of the current Green Barrier designations as currently defined. Although this whilst highlights that such areas have the same characteristics and purpose of formal green belt this is with the exception of their long-term permanency. As such it is important to consider how the application site performs as a Green Barrier site and whether or not the current policy designation is appropriate or necessary.

It is important to note that whether or not the site should be retained as a Green Barrier in the emerging Local Development Plan (LDP) has been considered through the preparation of the LDP Preferred Strategy which was published for consultation in February 2016. The Preferred Strategy was supported by a Strategic Green Wedge Review (Stage 1) document which reviews the existing Green Barrier designations around Wrexham with a view to making recommendations on whether any new Green Wedge designations are required and whether the existing Green Barrier designations need to be retained and, if not, what policy should replace the current Green Barrier designation.

Rather than dealing with each individual site the Strategic Green Wedge Review (Stage 1) (SGWR) document assesses the suitability of defined sub-areas with the application site falling within 'Area 3 – Wrexham North East'. The sub-area covers land to the north of Holt Road, east of the Llan-Y-Pwll link Road and south of Gresford as far east as Borrass Hall Lane (east of Borrass Quarry) with the application site forming the south western boundary of the area.

As such, the following paragraphs consider how the application fits within the purposes of the Green Barrier as identified at paragraph 5.2 taking account of our own assessment and the assessment carried out as part of the Strategic Green Wedge Review.

The first purpose is 'to prevent the coalescence of urban areas and villages with other settlements'. The application site is located immediately adjacent to the Wrexham Settlement Limit with the rear boundaries of those properties on The Links effectively forming the closest Settlement boundary – approximately 50m from the application site and separated solely by the Llan-y-pwll link road (A5156). As such the key consideration in this regard is whether or not the development of the application would result in the coalescence of Wrexham with any other existing settlement.

The closest other settlements to the application site are Wrexham Industrial Estate which is approximately 1.6km to the south east and Gresford, located approximately 2.6km to the north west of the site. However, the application site does not form the closest site within Wrexham to either settlements with the existing Wrexham settlement limits to the north and south of the site are significantly closer to both Wrexham Industrial Estate and Gresford with the narrowest gap between the settlements being approximately 1.2km and 1.3km respectively. As such it is clear that the proposals will not result in the gap between Wrexham and Wrexham Industrial Estate or Gresford narrowing let alone merging.

The only settlement that the site will be closer than any other part of the Wrexham settle area will be Holt village to the east of the application site. However, Holt is located approximately 4.9km (or 3 miles) away from the application site (the shortest route from site to site) and whilst the proposed development would result in Wrexham becoming closer to Holt this would only be by around 150m which in the context of the objectives of Green Barrier policy will be indiscernible and has to be considered insignificant in the context of effect. In any case the application site is tightly bounded by Wrexham Golf Club to the north and east with Borrass Quarry beyond meaning that any future extension of Wrexham to the east of the application site is not likely to be feasible or possible.

The development of this site would also reduce the gap between Wrexham and the village of Llan-y-pwll however, as with Holt, it will not result in the coalescence of the village with Wrexham and the impact would be negligible with a significant distance remaining (circa 1.6km) between the site and the village.

As such, the application site does not serve the first purpose for the Green Barrier as preventing development on this site is not necessary to prevent the coalescence of Wrexham and any other settlement.

This viewpoint is shared by Wrexham County Borough Council (Wrexham CBC) who in their Strategic Green Wedge Review confirm that there is good separation with the settlement edge of Wrexham and Gresford with a minimum gap of 1km at its narrowest noting that (the application site is even further away from Gresford at 1.6km); 'the gap between the two settlements is wider along the remainder of the settlement limits...There is only sporadic development in the area, and the area has a sense of openness due to the topography'. The SGWR goes on to confirm that there is 'not currently potential for coalescence to occur' confirming that 'there is no justification to retain a green wedge in this location based on this purpose' and that the presences of a settlement limit and a presumption against development in the open countryside would be sufficient to control development.

The second purpose of Green Barriers set out in paragraph 5.2 is '*to assist in safeguarding the countryside from encroachment*'. The application site is currently a small parcel (1.6ha) of vacant undeveloped site. Whilst the site was historically used for agricultural purposes this use ceased following the construction of the Llan-y-pwll link road (A5156) in the late 1970s/early 1980s. The site was further altered through the creation of a new enlarged roundabout at the junction of the A5156 and Holt Road (A534) in 2012 which saw a new access being created into the site via a new arm off the roundabout which also serves the adjacent golf club.

Thereby as the site is situated to the west by the A5156 with residential properties beyond and to the east by Wrexham Golf Club and can only be viewed when travelling along the A5156, it can be concluded that this site serves no purpose in safeguarding the Countryside from encroachment and would not harm the purpose of 'Green Barrier' in this instance. The third purpose of Green Barriers is '*to protect the setting of urban areas and villages*'. The development of this site will have a limited impact on the setting of the urban area in this location due to the site's location immediately adjacent two major roads (Holt Road and Llan-y-Pwll link road) and Wrexham Golf Club which gives the setting an urban feel, very different to the open countryside located further to the north, east and south.

The SGWR provides limited commentary on this purpose providing comment solely on the setting of the listed buildings located within the sub-area concluding that whilst the Green Barrier/Wedge policy helps to protect the setting of the listed buildings, there is already separate provision for the protection of these and, in any case, an open countryside policy would be sufficient. As none of the listed buildings are located close to the application site the commentary within the SGWR is not particularly relevant.

The final purpose of Green Barriers is *‘to assist in urban regeneration by encouraging the recycling of derelict and other urban land’*. As highlighted within the submitted Service Station Needs & Alternative Site Assessment; it is clear that there are no suitable and available sites within the urban area that are capable of accommodating the proposed uses and serving the identified need. As such, the site, and these proposals, can only be located on this site and as such will not have any impact on the potential for urban regeneration.

Again, the SGWR provides limited commentary on this purpose instead highlighting that this matter is controlled by settlement limits and the principles of Planning Policy Wales (PPW) in relation to the preference for the reuse of land. Paragraph 4.8.3 PPW confirms the purposes of Green Wedges (and Green Belt) which replicate those set out within the UDP. However, PPW identifies an additional purpose of Green Wedges which is to *‘manage urban form through controlled expansion of urban areas’*. As already highlighted, the application site is a small scale discrete site that is bounded by defensible boundaries in the form of Holt Road to the south and Wrexham Golf Club to the north and east. As such, any development on this site would represent controlled expansion and therefore the site does not serve this purpose. The SGWR considers this purpose. It concludes that the designation in this sub-area is already set along defensible boundaries and that *‘the absence of development pressure and the gap between the settlements results in the designation not performing this purpose’*.

As highlighted in PPW chapter 4.8.12, *‘in defining green wedges [or Green Barriers] it is important to include only land that is strictly necessary to fulfil the purposes of the policy’*. The site at present does not fulfil the purposes of the Green Barrier policy and is not *‘strictly’* necessary with the Golf Club to the east and Holt Road to the south provide defensible boundaries for the Green Barrier in the future.

The fact that the site is not required to be identified as a Green Barrier (or Green Wedge) is confirmed within the SGWR which concludes that within this sub-area;

‘The gap between the two settlements, containing only sporadic development, combined with an existing settlement boundary act as a constraint on expansion of Wrexham to the north, which would serve to avoid coalescence of the settlements. Therefore the designation is not necessary to serve the purpose of preventing coalescence. It is recognised that the green wedge exhibits other characteristics associated with the green wedge designation, including the management of urban form and safeguarding the countryside from encroachment, through defensible boundaries. It also performs a localised function of assisting in the protection of listed buildings. Notwithstanding this, given the distance between the two settlements, the lack of development pressure and the fact that development in this location would be controlled by the presence of a settlement limit along with national (and if needed) local policies presuming against development in the open countryside, and separate legislation which protects the setting of listed buildings, there appears to be little justification to retain a green wedge in this location. It is therefore recommended that the green wedge designation be removed and replaced by a countryside designation.’

To summarise, this site is located by strong, logical and defensible boundaries in the form of A5156 and golf club to the east, forming a rounding off of the Settlement. In addition, development of the site would not undermine the wider openness of the green barrier as it is so well self-contained with established boundaries on all sides. The development of the site would not result in the coalescence of settlements and, given the distance between this settlement and the next settlement, the function of the green barrier would remain even if this site is developed. Allowing the site to come forward for development would result in the controlled expansion of an urban area and assist in safeguarding further areas of the countryside from encroachment. The development of the site would not therefore conflict with the purpose of including the land within the green barrier.

Council's Comments: "Paragraph 4.8 of PPW - Also deals with the managing of urban form by means of green belts and wedges (which are essentially the same as green barriers) and states that there is a presumption against inappropriate development with substantial weight to be attached to any harmful impact which a development would have on a green wedge/barrier. It confirms that inappropriate development should not be granted planning permission except in very exceptional circumstances where other considerations would clearly outweigh the harm".

As already stated above and in further detail in the accompanying Planning Statement, this development is considered an exceptional circumstance as there is a current need for a roadside service station to serve those travelling north and north east from Wrexham Industrial Estate using the A483/North Wales Expressway to access the motorway network. The closest such service station providing suitable uses to is the Chester Services on the M56; approximately 23 miles from Wrexham Industrial Estate. It is considered that the site at Holt Road represents the only appropriate and sustainable site capable of serving this identified need.

The alternative site assessment that accompanies the application has established there are no alternative sites that would be more suitable than the proposed development site. The assessment has demonstrated that the development site is uniquely positioned in terms of its location and, by reference to the facilities it will provide, its ability to serve drivers using a wide range of important routes.

Furthermore, **PPW Technical Advice Note 18: Transport** highlights a requirement for the need for motorway and roadside services to be considered through the development plan stating at paragraph 8.7:

"The need for motorway and roadside service areas should be addressed within the development plan, and clear criteria should be set out against which applications will be assessed. This may require co-operation between neighbouring authorities to determine optimum locations".

The Council's Preferred Strategy has not considered roadside service station uses at this stage and it will be important for this to be considered as the LDP progresses. Nevertheless, it is clear that the Holt Road site represents the best and clearest opportunity to provide such uses and meet the identified need.

The application site is considered unique in that it is; located adjacent to the existing Wrexham settlement limit (across the Llan-Y-Pwll Link Road (A5156)); is vacant and has been for a number of years; has defensible boundaries in terms of preventing any further expansion into the countryside with Wrexham Golf Club bounding the site to the north and east with Holt Road to the south; and benefits from existing access directly off the A534/A5156 roundabout. Indeed this site is considered unique when looking at sites surrounding the Wrexham Settlement limits and as such represents an obvious and clear development opportunity site as highlighted by the historic planning permission for a hotel/leisure development on this site dating back to 1998.

Given the issues in terms of viability relating to farming the land; if this site was not allocated for development it would remain vacant providing no beneficial economic use for the local area and offering very little in terms of landscape or ecological value. Given the site's proximity to the Golf Club and key 'A' roads; it does not act or have the feel of open countryside and to designate it as such would only ensure that the site fails to make a positive contribution to the local area over the plan period. Such an outcome would not accord with the guidance set out within PPW at paragraph 7.2.1 which specifically seeks to ensure that land is treated as a resource stating that:

"Planning policies for economic development must provide developers and others with scope to make choices to secure the efficient and effect use of resources including land".

Clearly at present this site is not being used as a resource and it remaining as a vacant site would not make efficient or effective use of the land or the existing infrastructure that is in place to serve the site in the form of the existing roundabout access. As such, the development of this site will ensure that this site makes a significant economic contribution to the local area.

Importantly, the development of the site for the proposed development will offer considerable economic benefits through the generation of 55 and 74 Full Time Employment Jobs (FTE) during the operational phase of the development. Further to this the development will result in payable business rates generation of £0.12m per. These benefits combine to give the development a total economic value of £0.66m - £0.85m. Further in-depth details of the economic benefits are detailed in the accompanying Planning Statement.

Thereby to summarise the above, the application proposals do comply with Paragraph 4.8 of PPW.

Council's Comments: "Policy PS1, PS2, PS3 and PS4 - New development for housing, employment, and community services will be directed to within defined settlement limits/employment areas. Development should utilise brownfield land, maintain the existing pattern of development, encourage alternative the car (relating to the restaurant) and must not materially detrimentally affect the countryside and landscape. The development of the site would result in the incursion of development into an area of open countryside beyond the settlement boundary as such conflicts with these policies".

As previously stated the planning application proposal is exceptional in the fact that the proposed roadside services intended to serve those travelling north and north east from Wrexham Industrial Estate using the A483/North Wales Expressway to access the motorway network.

The accompanying Transport Assessment and Travel Plan has dealt with issues of sustainable transport in further detail and it has been considered that walking, cycling and public transport offer realistic modes of transport for staff and visitors of development. Public transport connections are available within the recommended distance as stated in national guidelines. As such, it is considered the proposed development is within a sustainable location in transport terms.

The Council's concerns in relation to development within the open countryside and beyond the settlement boundary have been addressed in the sections above and therefore it is considered that the application proposal accords with Policies PS1, PS2, PS3 and PS4.

Council's Comments: "Paragraph 4.7.8 of PPW - PPW includes a presumption in favour of sustainable development. Paragraph 4.7.8 of PPW states that development in the countryside should be located adjoining settlements where it can best be accommodated in terms of infrastructure, access, and habitat and landscape conservation. People living nearby would not be able to access the facilities without relying upon the car as safe and convenient crossing of the dual carriageway is not possible".

A key point relating to this proposed development and one that has already been presented as a key consideration is the purpose of the development proposals. And that is the fact they are designed to be and will function as dedicated road side services designed to meet the needs of road users.

As such and for the most part the main users of the facility will be drivers passing the site. They will not be local residents who wish to walk to the facility. That said the site is located adjacent to the settlement boundary, and as such has to be

regarded as a sustainable location as outlined in the sections above. The accompanying application documents have assessed and concluded that the site is within a sustainable location surrounded by the necessary infrastructure, access and facilities.

As highlighted in the paragraphs above; the accompanying Transport Assessment and Travel Plan has dealt with issues of sustainable transport in further detail and it has been considered that walking, cycling and public transport (close to bus stop) offer realistic modes of transport for staff and visitors of development. Public transport connections are available within the recommended distance as stated in national guidelines. As such, it is considered the proposed development is within a sustainable location in transport terms.

Council's Comments: "Paragraph 7.6.1 of PPW -The economic benefits do not outweigh the other considerations. With regards to the consideration of the contribution to the wider spatial strategy it runs contrary to Policy PS1 which directs new development to within defined settlement limits".

No weight is given to the benefits of developing road side services at a location that will benefit the town of Wrexham and outlying facilities like Wrexham Industrial Estate. Many travellers to this area will not know the area of town well. Having quality roadside services in this area allows visitors to stop and rest and take stock of the area and plan the next part of their journey. This will particularly benefit visitors to the industrial estate.

As previously highlighted, the development of the site for the proposed development will offer considerable economic benefits through the generation of 55 and 74 Full Time Employment Jobs (FTE) during the operational phase of the development. Further to this the development will result in payable business rates generation of £0.12m per. These benefits combine to give the development a total economic value of £0.66m - £0.85m.

In line with paragraph 7.2.2 of PPW "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".

To further reiterate, the site is vacant and has been for a number of years. Given the issues in terms of viability relating to farming the land and the fact the site represents a sustainable development site, if it isn't developed in future it will remain vacant providing no beneficial economic use for the local area and offering very little in terms of landscape or ecological value and therefore the proposal accords with PPW.

Council's Comments: "Paragraph 10.1.2 of PPW - Wherever possible this provision (A3) should be located in proximity to other commercial businesses, facilities for leisure, community facilities and employment. Town, district, local and village centres are the best locations for such provision at an appropriate scale. The proposal does not accord with this key objective. In relation to the existing alternatives, there is a range of options along various key routes in and around Wrexham town. Whilst the proposal would add to the options available to drivers, it would not 'fill a gap' in an area where such services for road users are scarce".

The submitted 'Service Station Needs Assessment and Sequential Site Assessment' that was submitted as part of the planning application package deals specifically with these matters and concludes there is a current need for a roadside service station to serve those travelling north and north east from Wrexham Industrial Estate using the A483/North Wales Expressway to access the motorway network and therefore would 'fill a gap' in the local area for these services.

Facilities of this nature have to be located next to the route they serve. There is no benefit or sense in locating them off the route. Indeed, experience of operators on the same confirms that road users will simply not be prepared to deviate from their routes in search of facilities.

Furthermore, there is no requirement for such facilities to be located next to other facilities. In this could be seen as prejudicial to the purpose of the facility which is to serve road users quickly and efficiently and without need for them to deviate from their route. Clearly, if the land around the site were to be allocated for other commercial uses then it might be possible to achieve this but this is not the intention.

A relevant material consideration in support of the proposed development is the fact that Stephen Bayley Head of Housing and Economy supports the economic benefits the proposed development will bring to the area. Please refer to his associated consultation response for details.

We would also re-emphasise that **PPW Technical Advice Note 18: Transport** highlights a requirement for the need for motorway and roadside services to be considered through development plans stating at paragraph 8.7:

“The need for motorway and roadside service areas should be addressed within the development plan, and clear criteria should be set out against which applications will be assessed. This may require co-operation between neighbouring authorities to determine optimum locations”.

The sequential test assessment in Section 5 of the submitted ‘Service Station Needs Assessment and Sequential Site Assessment’ has solely focused on potentially available and suitable sites within nearby centres. As the proposals will primarily serve routes providing access to Wrexham Industrial Estate, users of the Estate and the surrounding area, locating development elsewhere would not meet the identified need and therefore could not be considered suitable.

The assessment demonstrates that there are no sequentially preferable sites that are suitable to accommodate the proposed development with all sites identifying as being unsuitable to accommodate the proposed development.

The proposal therefore passes the sequential test and accords with PPW, TAN 4: Retailing and Town Centres and TAN 18: Transport.

Council’s Comments: *“Policy GDP1 - All new development should:- a) Ensure that built development...accords with the character of the site and makes a positive contribution to the appearance of the nearby locality. By virtue of its scale and design and divorced location, the development would not accord with the character of the site of make a positive contribution to the locality.*

*d) Ensure safe and convenient pedestrian access to and from development sites. This cannot be achieved in this instance.
e) Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible. The proposal would result in development isolated from pedestrian and cycling links, in contradiction to general development principles”.*

In response to point a) the application proposal will make a positive contribution and will complement the surrounding area and it has been already presented that the application site is not in a divorced location being adjacent the A5156 and enclosed by Wrexham golf club to the east.

Furthermore, this is just an outline application and matters have been reserved in regards to the design, scale and layout of the proposed scheme.

It is therefore considered that the proposal accords with GDP1 – part (a).

Council's Comments: *"Policy EC2 - The land is grade 3a agricultural which is considered to be the best and most versatile. This land should not be built upon unless there is no lower quality site available. No specialist evaluation of the loss of this land has been provided".*

As previously stated above the site is a small parcel (1.6ha) of vacant undeveloped land and whilst the site was historically used for agricultural purposes this use ceased following the construction of the Llan-y-pwll link road (A5156) in the late 1970s/early 1980s. The site was further altered through the creation of a new enlarged roundabout at the junction of the A5156 and Holt Road (A534) in 2012 which saw a new access being created into the site via a new arm off the roundabout which also serves the adjacent golf club

Given the issues in terms of viability relating to farming the land; if this site was not allocated or permitted for development it would remain vacant providing no beneficial economic use for the local area and offering very little in terms of landscape or ecological value. Given the site's proximity to the Golf Club and key 'A' roads; it does not act or have the feel of open countryside and to designate it as such would only ensure that the site fails to make a positive contribution to the local area over the plan period.

Such an outcome would not accord with the guidance set out within PPW at paragraph 7.2.1 which specifically seeks to ensure that land is treated as a resource stating that *"Planning policies for economic development must provide developers and others with scope to make choices to secure the efficient and effect use of resources including land"*.

Therefore, the development proposals fully accord with Policy EC2.

Summary and Conclusions

It remains our view that the development proposals are compliant with current planning policy and directly promote some of the key national and local principles of sustainable development.

As such this application should be approved without delay in line with the Local Development Plan and Planning Policy Wales.

Please do not hesitate to contact me if you have any questions regarding this.

Yours sincerely

R Wilbraham

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