Head of Community Wellbeing and Development
Pennaeth Adran Lles Cymuned a Datblygiad
Lawrence Isted

16 Lord Street, Wrexham, LL11 1LG
16 Stryt yr Arglwydd, Wrecsam, LL11 1LG
Tel/Ffon: 01978 292016 Minicom: 01978 292067
www.wrexham.gov.uk www.wrecsam.gov.uk

wrexham
COUNTY BOROUGH COUNCIL
CYNGOR BWRDEISTREF SIROL
wrecsam

MICHAEL CUNNINGHAM ARCHITECTS
202 VANILLA FACTORY
39 FLEET STREET
LIVERPOOL
L1 4AR

Your Ref/Eich Cyf	
Our Ref/Ein Cyf	ENQ/2013 /0401
Date/Dyddiad	05/12/2013
Ask for/Gofynner am	Matthew Phillips
Direct Dial/Rhif Union	01978 298780
E-mail/E-bost	matthew.phillips@wrexham.gov.uk

Dear Sir/Madam,

Town and Country Planning Act 1990

RESIDENTIAL DEVELOPMENT
LAND ADJ TO HOME FARM GRESFORD ROAD, LLAY, WREXHAM.

I refer to your enquiry for the above proposal. All information listed below is made based upon the information submitted as part of your enquiry;

National Policy:

Planning Policy Wales (Edition 5)

Mineral Planning Policy Wales

Technical Advice Note 1: Joint Housing Land Availability Studies

Technical Advice Note 2: Planning and Affordable Housing

Technical Advice Note 5: Nature Conservation and Planning

Technical Advice Note 11: Noise

Technical Advice Note 12: Design

Technical Advice Note 18: Transport

Technical Advice Note 22: Sustainable Buildings.

Minerals Technical Advice Note Wales 1: Aggregates

Development Plan policies:

Wrexham Unitary Development Plan

Strategic Policies

Broad Location of Development

PS1

PS2

PS3

PS4

Specific Policies

GDP1: Development Objectives

EC2: Agricultural Land

EC4: Hedgerows, Trees and Woodlands

EC6: Biodiversity Conservation

EC13: Surface Water Run-off

H7: Affordable Housing
S6: Local Need Shopping

CLF5: Open Space Requirements from new Residential Developments

T8: Parking

MW9: Protection of Mineral Resources

Local Planning Guidance Notes:

LPG7: Landscape and Development

LPG10: Public Open Space on New Housing Develoment

LPG16: Parking

LPG17: Trees and Development

LPG21: Space Around Dwellings

LPG24: Designing Out Crime

LPG27: Developer Contribution to Schools

LPG28: Affordable Housing

LPG30: Design A Guide for Developers and Architects when Designing Residential Developments

LPG32: Biodiversity and Development

Community Council contact details:

Llay Community Council
Sheila Woolrich (Clerk)
5 Forest Road
Off Gresford Road
Llay
Wrexham LL12 0UB

Local Member(s) contact details:

Councillor Terry Boland
166 Bryn Place
Llay
Wrexham LL12 0LT
Email: terry.boland@wrexham.gov.uk

Councillor Malcolm Taylor
11 Second Avenue
Llay
Wrexham LL12 0TB
Email: Malcolm.taylor@wrexham.gov.uk

Validation information:

Application forms (x4)

Site location plan (x4)

Block plan/indicative site plan (x4)

Design and Access Statement

Code for Sustainable Homes pre-assessment

Constraints (within or close to the site):

Outside of settlement limit.

Grades 2 and 3 Agricultural Land

Proximity to main roads – noise;

Potential mineral recourses below the site and the risk of sterilising mineral resources adjacent to it.

Contamination – it would appear several pond on site have been infilled with unknown materials.

Developer Contribution Requirements:

POS on site

Affordable Housing – 25% of dwellings built on site

Schools

Improvements to transport infrastructure

Requirements for Specialist advice:

Contamination Investigation: Former ponds within the site that have been filled will need to be investigated to determine if any of the fill material is contaminated.

Noise assessment and mitigation proposals.

Transport Assessment and transport infrastructure requirements.

Habitat Assessment and mitigation proposals

Arboricultural Impact Assessment and Method Statement

Agricultural Land – assessment to determine the exact grade of agricultural land and if confirmed to be Grades 1, 2 or 3a, the economic and environmental impact of the permanent loss of high quality agricultural land.

Retail Need and Impact Assessment if commercial development includes retail uses.

Site investigations in respect of minerals.

Code for Sustainable Homes pre-assessment

Views of officer:

Policy

The site lies outside of the settlement boundary of the UDP and residential development would represent a significant departure from current adopted local policy.

Notwithstanding the above Wrexham does not currently have a 5 year housing land supply as required by paragraph 9.2.3 of Planning Policy Wales (PPW) and the site could potentially make a significant contribution towards increasing housing land supply. However this is dependant upon it being demonstrated that the site is free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development. Justification for the release of the site in line with paragraph 9.2.9 of PPW would also be required.

Whilst the land supply issue is a material consideration, there are a number of other significant constraints, issues and impacts that will need further detailed consideration:

Minerals

Approximately half of the site is lies within an area safeguarded from development in order to prevent potentially valuable mineral reserves being sterilised (policy MW9).

Although there is no borehole data for the site, borehole data from the wider locality together with the fact that there has been extraction of sand and gravel nearby suggests that there are economically viable mineral resources under the site.

Further investigation is needed to be undertaken to establish the quality of the sand and gravel under the site location. It will then be necessary to consider what the implications of prior extraction would be in relation to the intended development (land levels, timescales for development etc) and what level of prior extraction would be appropriate taking all this into account.

Development of this site will also potentially sterilise mineral recourses beyond the site boundary given that current policy advises extraction occurs at least 100m from sensitive development such as housing. This will also need to be taken into account. Boreholes taken from within the site along with existing borehole data could potentially be used to establish the extent of the loss of sand and gravel deposits if undeveloped land adjacent to the proposal site cannot be accessed.

If this site is to be developed it seems probable that there would be some sterilisation of mineral resources both under the site as well as adjacent land. Permission is only likely to be granted if it can be demonstrated that there is a clear need and substantial benefit arising from the development that outweighs the harm resulting from the loss of important mineral recourses.

For further advice on this matter please contact Martha Savage, Senior Minerals and Waste Planning Officer, North Wales Minerals and Waste Planning Service (Martha_Savage@flintshire.gov.uk or 01352 703298)

Agricultural Land

The development will result in the irreversible loss of what appears to be Grades 2 and 3 agricultural land. Further site investigation will be required by a suitably qualified person familiar with Agricultural Land Classification guidelines to determine if Grades 1, 2 or 3a land is present on the site.

If any of the above mentioned grades of land are identified it will be necessary to demonstrate that the there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the need to preserve high quality agricultural land in accord with paragraph 4.10.1 of PPW.

Landscape

The following sets out the landscape and visual issues of the site - some of which may preclude development of parts of the site and others, which whilst not necessarily constraints to development, need to be positively addressed:

- The landscape of the site has a simple field pattern over flat topography without trees. It is an area of moderate landscape character and quality of local value, but very open. The locality has a traditional farmed character;

- The line of trees including Scots pines and estate fencing along the site's boundary with the B5373/Llay are a distinctive feature and important to the rural character of the locality. Retention of trees and proposals for their future management/ replacement to ensure longevity of this feature would be required;

- The site is very open with many filtered views over its western edge from existing settlement at Llay. Proposals should aim to retain a sense of the areas rural locality through a combination of development layout, set back, built character and landscaping/public open space;

- There is an open, long vista from the Straight Mile focused towards the ridgeline of the Peckforton Hills in the Cheshire Plain. This view is very scenic, lacks development, is distinctive and important to sense of place. The future layout of the site should avoid intruding upon this view;

- The boundaries of dwellings onto open countryside need to integrate well with the very open traditional farmed character of the landscape beyond. It is therefore important for such boundaries to take a form which avoids a harsh, linear, uniform suburban appearance.

Built character references from the existing traditional farm complex at Home Farm would be appropriate and massing and arrangement of buildings which replicate farm complexes intermixed with tree planting could be appropriate responses;

- Public open space should be of a quality and provision which provides accessible natural green space to both existing and new communities. The location of open space along the edges of the new development could benefit the development's rural integration. Proposals for the future management of the open space will also be required.

Design

I appreciate that the plans submitted are indicative but I am concerned about the suggested density. This appears to be much higher that existing development in the immediate vicinity and does not take account of the edge of settlement location of the site. In order to achieve the suggested density 2.5 or 3 storey development may be required. This would inevitably have a significant and detrimental impact upon the edge of settlement location of the site and its immediate surroundings.

The table on page 20 of the submission refers to Planning Guidelines in respect of density however the Council or Welsh Government has adopted policies or guidance that sets minimum densities.

The layout and design of any formal proposals will need to take account of the following requirements:

- onsite open space at a rate of 0.4 hectares per 50 dwellings (or 80 square metres per dwelling) accessibly located and suitable for use as playing fields, equipped play and sports facilities and informal open space;

- LPG10 advises that developments with an open space requirement in excess of 6ha should include playing fields.

- Mitigation in respect of ecology should this be required.

Commercial Development

The indicative plans suggest part of the site could be occupied by a commercial development. If this area were to include retail development, then the need for and impact of that development should be demonstrated. Nevertheless and notwithstanding that the a case needs to be made to justify the acceptability of the principle of development on this site, the sustainability of the site could be enhanced in some form of local needs shopping provision were provided.

Affordable Housing

The Council would expect 25% the total number of units proposed to be affordable units to include a mixture of social rented, intermediate rented and shared equity units. You/your clients are advised to liase with the Council's Affordable Housing Officer Maureen Lee (Maureen.lee@wrexham.gov.uk or 01978 315574) to ensure any formal proposals adequately take account of local housing needs.

Highways

A Transport Assessment will be required. The capacity of the junction of Llay Road, Rackery Lane, Chapel Lane, The Straight Mile and Gresford Road to cater for additional traffic will need to be considered in particular. Please contact Senior Development Control Engineer Peter

Douthwaite (peter.douthwaite@wrexham.gov.uk or 01978 729689) for further advice on the required scope of a Transport Assessment.

Noise

The site adjoins the Straight Mile which is one of the main routes to/from the Llay Industrial Estate and is regularly used by heavy goods vehicles. It will therefore be necessary to assess the existing noise levels within the site and if necessary, incorporate mitigation features into the layout and design of the development.

Conclusion

There is a pressing need to increase the supply of housing land in the County Borough. However, there are a number of significant policy and site constraints, issues and potential impacts that will need to be fully assessed and considered in detail before a formal application could be supported.

The advice is based on the planning policies, guidance and circumstances that apply at the time of this response. This advice may not be relevant may should policies or circumstances change before a formal planning application is submitted. You should also note that 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.

Yours faithfully,

Head of Community Wellbeing and Development