

LAND EAST OF TAN Y BONT MAIN ROAD, RHOSROBIN, WREXHAM

OUTLINE PLANNING APPLICATION FOR
RESIDENTIAL DEVELOPMENT (UP TO 400 UNITS)
ALL MATTERS RESERVED EXCEPT FOR ACCESS

PLANNING STATEMENT

Submitted on behalf of

LIBERTY PROPERTIES

Prepared by

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November 2014

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1.0 INTRODUCTION

- 1.0.1 This statement is being submitted in support of an outline planning application for residential development, all matters reserved except for access, on land east of Tan y Bont Main Road, Rhosrobin, Wrexham. The application is made on behalf of the landowners, Welsh Town Planning & Housing Trust Ltd, Mrs I Dutton, Mr J Dutton, Mr P Davies, Mr D Griffiths, in conjunction with Liberty Properties.
- 1.0.2 In addition to this Planning Statement, this planning application is supported by an Environmental Statement including appendices (Volumes 1, 2 & 3), a Design & Access Statement, a location plan and an illustrative masterplan. This Planning Statement describes the site and its surrounds, before setting out the planning policy context under which the application should be considered. The planning merits of the proposal are then examined and the conclusion is reached that there are no material considerations which indicate that planning permission should not be granted.
- 1.0.3 One of the applicants, the Welsh Town Planning & Housing Trust Ltd, is one of the founders of the 'Garden Village' movement. Garden Village was first developed at the start of the 20th century to meet the housing demand that came with an increase in industry in Wrexham. The development began with the purchase of 200 acres of land from Sir Foster Cunliffe near the Acton Estate by the Welsh Town Planning and Housing Trust Limited. The intention was to provide affordable housing to workers coming to Wrexham to work in the expanding industries of coal and iron. A co-partnership housing society was set up in 1913 called Wrexham Tenants Limited, while the trust was charged with building the roads and supervising the development of the estate. The original plans to provide a village institute, two places of worship, a school and plenty of open spaces and recreation grounds were inspired by the garden city movement and was planned as a garden suburb.
- 1.0.4 Liberty Properties is a vibrant, forward-thinking company whose strengths are based firmly on the foundations set by a history of success. They are a local company, established for over 25-years, with a strong track record of working co-operatively with the Council on a variety of projects.
- 1.0.5 The proposed development comprises medium scale residential development on the 15.79 ha (39.02 acres) site. An indicative masterplan has been prepared to exhibit a development framework that can be achieved, inclusive of landscaping, public open space, and green corridors. The proposed scheme design develops a sympathetic semi – rural development, with a strong emphasis on sustainable design and consideration environmental, social and economic issues.

- 1.0.6 The site has been put forward for consideration in the Council's first 'call for sites' as part of the evidence base for the preparation of the emerging Wrexham County Borough Council Local Development Plan (LDP) 2011-2018. In light of the extended timeframe associated with the adoption of the LDP, and the requirements of the Council to show a 5-year housing land supply evidence base, the decision has been taken to submit a planning application at this juncture.
- 1.0.7 The applicant, through the formal pre-application process and scoping exercise regarding an Environmental Impact Assessment, has engaged in detail with the Officers of Wrexham Council with regard to all material facets of the application. Best efforts have been undertaken to accommodate the extensive observations made by the Council. Every effort has been made to meet with and discuss the merits of the proposal with the Ward Councillors, however they have not been prepared to meet with us. Refer to **Appendix A** for a 'Statement of Consultation' that provides a simple summary of the pre-application endeavours that have been undertaken.

2.0 SITE CONTEXT

- 2.0.1 The site is located approximately 2 km north of Wrexham town centre, adjacent to the A483 that bounds the main conurbation of Wrexham to the north and west. The site lies between the areas of Old Rhosrobin and Pandy and is easily accessible to the surrounding smaller settlements of Gwersyllt and New Rhosrobin.
- 2.0.2 The site is currently accessed via a vehicle access point/gate located upon the B5425 (New Road). The site is generally rectangular in plan, with orientation from SW to NE. The total site measures 15.79 ha (39.02 acres). The site is located at grid reference 333150, 352630.
- 2.0.3 The site is bordered to the NW by the main single Railway line between Shrewsbury and Chester, to the SW and SE national road network, the B5425 (New Road) from Wrexham to Rhosrobin / Llay and A483 (dual carriageway) from Wrexham to Chester respectively. The current land use is principally permanent pasture and grassland, with areas of scrub.
- 2.0.4 The land is bordered by residential development on three sides (North, East and South). There is currently a major planning application for residential development on land to the west of the site, which would effectively result in the site being 'landlocked' by residential development.

3.0 PROPOSED DEVELOPMENT

- 3.0.1 The application site is currently used as open grazing land and is designated as a Green Barrier in the adopted UDP. The submitted proposal is to develop the site for a residential use with a view to contributing towards the Council's future housing supply in what is considered to be a sustainable location. Whilst the scale of the development would ordinarily be best promoted as an allocation through the Development Plan, in view of the extended timeframe associated with the adoption process, in this circumstance it is felt that a planning application is merited in advance of that process.
- 3.0.2 As background to consideration of the site, it is our understanding that an extent of the site was historically supported by the Council as a housing allocation in the preparation of the now adopted UDP, although the allocation was not endorsed by the Inspector at Public Inquiry.
- 3.0.3 Three Private Landowners have entered into an agreement with Liberty Properties to develop the total site area of 15.79 ha for residential development. The comprehensive development of the land was promoted in principle by Officers of Wrexham County Borough Council through pre-application discussions that have taken place.
- 3.0.4 Whilst submitted in outline only, it is submitted that the principles of the proposed development include the following:
- The development is for up to 400 residential units, the net developable area being in the region of 11.21 ha (density in the region of 35 units per ha).
 - 25% of the residential units will be affordable housing, in accordance with adopted policy.
 - The site will provide in the region of 4.50 ha of open space, accommodating children's play areas, informal open space and green corridors.
 - A new link road will be provided through the site, via new points of access on Tan y Bont main road and Plas Acton road.
 - Pedestrian links through the site will be enhanced.
 - The setting of the Scheduled Monument, Wat's Dyke, will be enhanced.
- 3.0.5 The fact that the application is on outline only, with all matters reserved except for access, means that the specific details of the development are restricted. An assessment of the site and the associated constraints and opportunities has been undertaken and a masterplan / development framework

prepared to give an understanding of how the site could be best be developed, this is submitted for illustrative purposes only. More detailed assessment of this process is set out in the accompanying Design & Access Statement.

3.0.6 The illustrative masterplan is set out as follows:



4.0 PLANNING POLICY CONTEXT

- 4.0.1 This section provides an overview of the national and local planning policies that are relevant to the development.

4.1 Relevant Plans and Policies

- 4.1.1 The overriding development plan for the county is the Unitary Development Plan (UDP), although this has now reached its date of close in 2011. With this in mind however the Wrexham Unitary Development Plan is still the most up to date Plan available at a local level. The UDP is set to be replaced by the Wrexham Local Development Plan, a deposit draft of which has previously been withdrawn upon the recommendation of the Inspector at Examination. The main issue brought up in the proposed plan was a housing shortfall, equating to 3,721 units (248 units per year over the course of the Plan period (2008-2023)). The Council are now working on a revised Plan, taking into consideration the Inspectors comments on the housing shortfall, and adoption is scheduled for 2017.

- 4.1.2 National Planning Policy in Wales is contained in Planning Policy Wales and supported by a series of technical Advice Notes, covering a wide variety of topics.

- 4.1.3 The Welsh Assembly Government's (WAG) land use planning policies are set out in Planning Policy Wales (PPW), plus Technical Advice Notes, Circulars and Ministerial Interim Planning Policy Statements. The need to achieve sustainable development is at the heart of the aims of the policy guidance and the four broad objectives are:

- Social progress that recognises the needs of everyone;
- Maintaining high and stable levels of economic growth and employment;
- Effective protection of the environment; and
- Prudent use of natural resources.

4.2 National Planning Guidance

Planning Policy Wales (Edition 5)

- 4.2.1 Paragraph 9.1.1 of the Planning Policy Wales document states that new communities and homes should be energy efficient housing related services should be improved and a greater number of residential units

of an increasingly greater variety should be delivered. These new units must be; *“well designed, meeting national standards for the sustainability of new homes and making a significant contribution to promoting community regeneration and improving the quality of life”*.

- 4.2.3 The result of new housing developments on the edge of town and in villages must have mixture of affordable and market housing, retaining and enhancing important landscape and wildlife features in the development.
- 4.2.4 The National Policy states that sustainable residential environments should be promoted; making adequate provision for affordable homes and encouraging unique and appropriate design (9.1.2). Mixed tenure communities must be encouraged, as must communities with good access to employment, retail and other services. New dwellings must have a focus on quality design; create safe and attractive neighbourhoods, with an emphasis on landscaped areas with usable open space giving regard to biodiversity and nature conservation. The Policy sets out an emphasis on construction of; *“housing with low environmental impact by using nationally prescribed sustainable building standards; reducing the carbon emissions generated by maximising energy efficiency and minimising the use of energy from fossil fuel sources, using local renewable and low carbon energy sources where appropriate”* (9.1.2).
- 4.2.5 There is a similar emphasis on the provision of Affordable housing as it; *“makes an essential contribution to community regeneration and social inclusion. It is desirable in planning terms that new housing development in both **rural** and urban areas incorporates a reasonable mix and balance of house types and sizes so as to cater for a range of housing needs and contribute to the development of sustainable communities. For affordable housing it is important that authorities have an appreciation of the demand for different dwelling sizes and types of housing”* (9.2.15).
- 4.2.6 Paragraph 9.2.22 of the Planning Policy Wales looks into rural housing provision, there is an emphasis on sustainable development that enhances and maintains the environment. The outlook is similar to that general guidelines of a wide range of housing types, including affordable, a limited need for private transport, with infilling of village with affordable houses being acceptable.
- 4.2.7 Section 4.5.1 – 4.5.11 discusses the National approach to planning for Climate Change. The Welsh Government aims to reduce all greenhouse gas emissions by 40% by 2020. This leads to a focus on Planning to minimise the causes of climate change (4.5.7) and Planning for the consequences of Climate Change, stating; *“Planning for climate change must be carried out in a way that is consistent with*

sustainability principles, and in a way which does not prejudice future action to tackle climate change, by integrating solutions to tackle the causes and consequences of climate change. This will require close co-operation across all sectors and communities”.

4.2.8 Section 4.7 states that; development in the countryside should be located within and adjoining those settlements where it can be best be accommodated in terms of infrastructure, access and habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design. The location of new development should be biased as follows:

- Higher density schemes would ideally be located close to centres/hubs/interchanges and route corridors.
- Improve the vitality of village/town centres.
- Improve links between rural and urban areas.
- New development should be well served by existing infrastructure.
- Development should encourage opportunities for commercial and residential uses to derive environmental benefit from co-location.
- Higher density schemes should be located close to major public transport links and close to libraries and other public services.

4.2.9 Section 4.8 discusses Green Belt and Green Wedges, Green Belt is a national designation designed to protect land for a longer period than the current development plan period, with green wedge (barrier) policies should be reviewed as part of the development plan process. Both Green Belt and green wedges (barriers) are designed to:

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

- prevent the coalescence of large towns and cities with other settlements;
- manage urban form through controlled expansion of urban areas;
- assist in safeguarding the countryside from encroachment;
- protect the setting of an urban area; and
- assist in urban regeneration by encouraging the recycling of derelict and other urban land.

4.2.10 The designation of a green wedge does not convey the permanence of a Green Belt, and should only be maintained where Local planning authorities can demonstrate that normal planning and development management policies cannot provide the necessary protection. They should state in their development plans the areas that require extra protection and why.

4.2.11 The general policies controlling development in the countryside apply in green wedges, but there is, in addition, a general presumption against development which is inappropriate in relation to the purposes of the designation.

4.2.12 When considering green wedges local planning authorities will need to ensure that a sufficient range of development land is available which is suitably located in relation to the existing urban edge and the proposed green wedge.

4.3 Technical Advice Notes

Technical Advice Note 1: Joint Housing Land Availability Studies (2006)

4.3.1 The note sets out that “Local planning authorities must ensure that sufficient land is genuinely available to provide a 5 year supply of land for housing. This land supply must inform the strategy contained in the development plan. Local planning authorities should also have regard to the requirement to prepare and provide timely housing land supply figures to satisfy the requirements of the Wales Programme for Improvement Core Planning Indicators and Local Development Plans Annual Monitoring Reports (AMR).”

4.3.2 Local planning authorities should integrate development plan and JHLA processes. JHLA studies provide an important part of the evidence base for plan preparation. The results of the Joint Housing Land Availability Studies should be treated as a material consideration in determining planning applications for housing. Where the current study shows a land supply below the 5 year requirement, the need to

increase supply should be given considerable weight when dealing with planning applications, provided that the development would otherwise comply with national planning policies.

Technical Advice Note 2: Planning and Affordable Housing (2006)

- 4.3.3 The concept of affordability is generally defined as the ability of households or potential households to purchase or rent property that satisfies the needs of the household without subsidy. The note discusses the process by which a level of needed affordable housing is ascertained for individual markets/areas.
- 4.3.4 As set out in Planning Policy Wales, good design can protect the environment and enhance its quality, help to attract business and investment, promote social inclusion and improve the quality of life. These objectives apply equally to market housing and to affordable housing, the overriding principle being to establish a sense of place and community. Affordable housing should also be indistinguishable from market housing provided on the same site, in terms of external design quality and materials.
- 4.3.5 When deciding whether to use planning conditions or planning obligations, and in formulating their terms, authorities will need to be aware of the need both for secure arrangements to cover all eventualities and for flexibility to enable or encourage a scheme to proceed. While arrangements should be legally binding and ensure the housing is occupied as intended, they should also take account of the needs of developers and registered social landlords, who may need to raise development finance to ensure the financial viability of the scheme, and who may be obliged to operate within certain time limits. Examples of planning obligations which may be used in different circumstances are set out in Annex A of the Note.

Technical Advice Note 5: Nature Conservation and Planning (2009)

- 4.3.6 Biodiversity conservation and enhancement is an integral part of planning for sustainable development. The planning system has an important part to play in nature conservation. The use and development of land can pose threats to the conservation of natural features and wildlife. Past changes have contributed to the loss of integrity of habitat networks through land-take, fragmentation, severance, disturbance, hydrological changes and other adverse impacts. But development can also present significant opportunities to enhance wildlife habitats and the enjoyment and understanding of the

natural heritage. Whilst the planning system needs to be watchful of the cumulative effects of a series of small, perhaps occasional, apparently insignificant losses from the natural world, which can combine to seriously deplete the natural heritage, including essential hydrological and ecological systems; small scale opportunities for habitat creation and enhancement can be significant and can build into major contributions over time. This TAN demonstrates how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.

4.3.7 The development control process is a critical stage in delivering the protection and enhancement of nature conservation required by PPW. The following can help to achieve these objectives:

- adopting the five-point approach to decision-making - information, avoidance, mitigation, compensation and new benefits;
- ensuring that planning applications are submitted with adequate information, using early negotiation, checklists, requiring ecological surveys and appropriate consultation;
- securing necessary measures to protect, enhance, mitigate and compensate through planning conditions and obligations;
- carrying out effective planning enforcement;
- identifying way

Technical Advice Note 11: Noise

4.3.8 The note sets out that if a change of use of a site results in an increased amount on noise then consideration should be given to using appropriate conditions, similarly an increased disturbance while development takes place, must be taken into consideration.

4.3.9 Noise characteristics and levels can vary substantially according to their source and the type of activity involved. The impact of noise from sport, recreation and entertainment will depend to a large extent on frequency of use and the design of facilities. Advice on assessing noise and on factors to consider in relation to the major noise sources including roads, railways, airports, industrial and recreational noise.

4.3.10 Local planning authorities should consider whether proposals for new noise-sensitive development would be incompatible with existing activities, taking into account the likely level of noise exposure at the time of the application and any increase that may reasonably be expected in the foreseeable future.

Such development should not normally be permitted in areas which are, or are expected to become, subject to unacceptably high levels of noise and should not normally be permitted where high levels of noise will continue throughout the night.

Technical Advice Note 12: Design

- 4.3.11 The note states that: Design issues, as influenced through the planning system, should not duplicate the role of building regulations. As a general rule, planning relates to the external appearance of a building, and its relationship with its context. Building Regulations deal with the technical performance of a building's structure and services. However, the initial design of a building in the planning process needs to consider the ability of the building to meet Building Regulation Requirements. Design should therefore be a fundamental consideration from the outset and should not be treated or developed in isolation.
- 4.3.12 Good design is not inevitable. It requires a collaborative, creative, inclusive, process of problem solving and innovation - embracing sustainability, architecture, place making, public realm, landscape, and infrastructure. The note states that good design is all inclusive and acknowledges diversity and flexibility. The below diagram is taken from the note and illustrates the role of designing in context in achieving the key objectives of good design.



4.3.13 Opportunities for **innovative design** will depend on the existing context of development and the degree to which the historic, architectural, social or environmental characteristics of an area may demand or inhibit a particular design solution. Thorough appraisal of context can provide design pointers, which help to inspire an innovative design response, which meets present and future needs. A contextual approach should not necessarily prohibit contemporary design.

4.3.14 Appraisal of the **landscape** should focus on its quality in terms of geology and geomorphology, vegetation and habitats, visual and sensory quality and historic and cultural quality. "LANDMAP" is one method of assessment which has the potential to provide a framework and information base from which good design and management can be developed. Historic Landscape Characterisation provides a more detailed level of assessment for the historic environment, and studies have been carried out for all of the areas included in the Register of Landscapes of Historic Interest in Wales. Further detailed site appraisals may also provide information on local hydrology, microclimate, soils, plant communities and features, and all visual qualities including views and vistas.

Design and Access Statements

- 4.3.15 It is a statutory requirement that applications for planning permission and listed building consent (with exceptions) are accompanied by a design and access statement (DAS). Further guidance relating to the requirement for a design and access statement is included in appendix 1 of TAN 12.
- 4.3.16 The DAS is a communication tool explaining how the objectives of good design (which include the principles of inclusive design) have been considered from the outset of the development process. In relation to design, a DAS must explain the design concepts and principles applied to the development or works. A DAS accompanying an outline or full planning application must explain the concepts and principles in relation to (as a minimum):
- **Access;**
 - **Character** (including amount, layout, scale, appearance and landscaping);
 - **Community safety;**
 - **Environmental sustainability; and**
 - **Movement to, from and within the development.**

Housing Design and Layout

- 4.3.17 To achieve greater sustainability in residential developments, land must be used to its maximum level of efficiency and sites must have strong links to services, centres and public transport. For a successful residential area, the design of housing should be to establish a sense of place and community, with the movement network used to enhance these qualities, and to incorporate features of environmental sustainability. New developments in relation to design should aim to; create places for people, respecting local character; encourage community, via layout; focus on pedestrian experiences not vehicles; manage vehicle speeds via road layout; promote energy efficiency etc.; use land to its utmost efficiency.
- 4.3.18 Developments should reflect local character and context, local landmarks/ mature trees etc. should be retained and old and new should be integrated beyond the architectural finish. In general, References very effort should be made to orientate dwellings so that they front existing roads and spaces, ensuring a balance with the need to promote features of environmental sustainability. The relationship of the

perimeter of a development to its setting is important and developments which turn their back on existing roads do not integrate well with their context.

Technical Advice Note 18: Transport

- 4.3.19 An efficient and sustainable transport system is a requirement for a modern, prosperous and inclusive society. However, transport, in particular road traffic, can also have negative impacts on human health and the environment. In responding to such challenges, the Assembly Government adopts a sustainable development approach as the overarching framework within which strategies and policies are developed.
- 4.3.20 PPW and the Wales Transport Strategy both aim to secure the provision of transport infrastructure and services, which improve accessibility, build a stronger economy, improve road safety and foster more sustainable communities. This includes:
- Integration of transport and land use planning;
 - Integration between different types of transport;
 - Integration of transport policy with policies for the environment, education, social justice, health, economic development and wealth creation.
- 4.3.21 With regards to residential development, schemes that promote housing development at locations with good access by walking and cycling to primary and secondary schools and public transport stops, and by all modes to employment, further and higher education, services, shopping and leisure, or where such access will be provided as part of the scheme. Design of new developments should also promote walking and cycling whilst managing traffic speed through active traffic calming measures.
- 4.3.22 With specific regard to rural residential developments; The car is important for accessibility in rural areas and is likely to remain so for the foreseeable future. However significant population groups, who have limited access to a car can experience severe problems of social exclusion. Improving accessibility for these groups will help to promote social inclusion and reduce rural isolation.
- 4.3.23 Development in rural locations should embody sustainability principles, balancing the need to support the rural economy, whilst maintaining and enhancing the environmental, social and cultural quality of

rural areas. Most development should be located in places accessible by a range of travel modes. Different strategies should also be considered for rural sites in close proximity to urban centres.

Technical Advice Note 22: Sustainable Buildings

- 4.3.24 The planning system can play an important part in improving the sustainability of new developments whilst also tackling climate change. As set out in PPW, the planning system must provide for new homes and buildings in a way which is consistent with sustainability principles.
- 4.3.25 Buildings in Wales have an inherent environmental impact and contribute to carbon emissions; they require natural resources to be used both in their construction and use, and the way in which they are designed affects how the occupiers use the building over its lifetime. The way in which they are designed can also reduce the vulnerability to the effects of climate change.
- 4.3.26 It is the aspiration of the Welsh Assembly Government that in the future all new buildings achieve a zero carbon standard. This is part of a wider programme of action to tackle both the causes and consequences of climate change and to promote sustainable development.
- 4.3.27 Planning therefore has a role in encouraging and facilitating homes and buildings that meet higher sustainable standards. In response to this, PPW sets out the Assembly Government's land use planning policies in respect of planning for sustainable buildings. This includes a national development management policy on planning for sustainable buildings that expects minimum sustainable building standards to be achieved for most new planning applications for residential and non-residential development.

The role of design in delivering Sustainable Buildings

- 4.3.28 Delivering more sustainable buildings through good design is a key part of national planning policy as set out in PPW. This TAN should be read alongside TAN12 which provides guidance on delivering good design through the planning system. Relevant references to TAN12 are included in this TAN where appropriate.
- 4.3.29 It is a statutory requirement that applications for planning permission and listed building consent (with exceptions) are accompanied by a design and access statement (DAS). It is expected that the DAS will contain the necessary information for the determination of a relevant planning application by a local planning authority. This is to ensure that the design of a sustainable buildings is integral to the design

of the whole development. Further guidance relating to the requirement for a design and access statement can be found in TAN12.

Residential

4.3.30 The Code for Sustainable Homes (“the Code”) is a recognised national standard to improve the sustainability of new homes in the UK. The Code scheme currently covers nine sustainable design categories and uses a sustainability rating system – indicated by ‘stars’, to communicate the overall sustainability performance of a home. These categories are as follows:

- Energy/CO₂
- Water
- Materials
- Surface water run-off
- Waste
- Pollution
- Health and Well-being
- Management
- Ecology

4.3.31 For each category there are a number of credits available, these credits can be awarded or withheld depending on a buildings performance according to the defined assessment criteria. Credits for each of the categories are weighted and added together to produce a single overall score. Under the Code a new home can achieve a sustainability rating from one to six stars.

Design Approach

4.3.32 To design a building that meets the minimum level of sustainability expected, a developer will need to incorporate **environmentally sustainable design solutions** into their proposed development. These design solutions will have an effect on the internal design and external appearance of a building and its relationship with its context. TAN12 sets out a number of environmentally sustainable design solutions in delivering ‘Environmental Sustainability’, a key aspect of good design.

- 4.3.33 Design solutions will need to reflect the sustainability categories set out under the relevant sustainable buildings standard in order to achieve the minimum standard expected and the associated credits.

4.4 Local Planning Policy

Wrexham County Borough Unitary Development Plan (2005)

- 4.4.1 The Wrexham Unitary Development Plan covers the administrative area of the Wrexham County Borough Council. It supersedes previous adopted development plans, namely the Wrexham Maelor Local Plan: Forward to 2001, the Glyndwr District Local Plan, and the Clwyd Structure Plan: First Alteration. It provides a framework for local decision-making and the reconciliation of development and conservation interests in order that land use changes proceed coherently and with maximum community benefit. The Plan's base date is April 2001.
- 4.4.2 The Wrexham Unitary Development Plan forms the statutory Development Plan for the County Borough for development control purposes. The UDP policies and paragraphs relevant to the proposed development are set out below.

Planning Strategy

Part 1: Strategic Policies

- 4.4.3 The housing element of the strategy reflects the overall approach towards settlement growth set out above. In essence, the aim is to allocate most new housing development to a range of sites within and adjacent to existing built up areas; to make optimum use of previously developed or vacant land; to make use of spare capacity in infrastructure and services; and to focus on locations with reasonable public transport, walking and cycling links.

General Development Principles

Policy GDP1 – Development Objectives, states all new development should:

- a) Ensure that built development in its scale, design and layout and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.
- b) Take account of personal and community safety and security in the design and layout of development and public / private spaces.

- c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources.
- d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.
- 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.
- f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.
- g) Secure public services (e.g. gas, water, electricity) to development at minimum public cost.
- h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.
- i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site.
- j) Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity from development that could harm this identity.
- k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.

Environment and Conservation

Policy EC1

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

Policy EC2

Development on agricultural land of grades 1, 2 or 3a will only be permitted if it does not lead to the irreversible loss of that land.

Policy EC4

Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape. Development which results in the loss or significant damage to valuable trees, important hedgerows or ancient woodland sites will not be permitted.

Policy EC11

Development which would adversely affect the site or setting of a Scheduled Ancient Monument or archaeological site of national significance will not be permitted. Development that directly affects non-scheduled sites of archaeological importance will only be permitted if an archaeological investigation has been carried out to determine the nature, extent and significance of the remains, and this investigation indicates that in-situ preservation is not justified, and a programme of excavation and recording has been agreed. Development will also be carefully controlled to ensure that the setting of non-scheduled sites of archaeological importance is not harmed where appropriate.

Policy EC13

Development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted.

Housing**Policy H7**

Where there is a proven lack of affordable housing to meet local needs, the Council will negotiate with developers to provide an element of affordable housing in new proposals of 25 or more homes. The initial benefit of discounted prices will be retained for subsequent and future occupants through the scheme's management by a suitable local housing body with the aid of legal agreements.

Community and Leisure Facilities

Policy CLF5

New development of ten dwellings or more must provide informal public open space within the site at a minimum level of 0.4 hectare per 50 dwellings, be conveniently located for users, and usable for playing field(s) and/or equipped children's play area(s) and open amenity area(s). In exceptional circumstances, the application of these standards may be varied, in the case of small urban infill housing development, where the developer enters into a legal agreement for financial contributions towards the cost of public open space provision where:-

- a) the site is unsuitable for public open space provision; or*
- b) the development would not place significant additional pressure on public open space facilities in the vicinity of the site.*

Policy CLF6

The existing pattern of public rights of way will be protected, maintained and improved and any potential new routes will be identified and safeguarded.

Minerals & Waste

Policy MW9

Resources of sand and gravel, and clay will be safeguarded from non-mineral development in order to prevent the sterilisation of unworked minerals deposits. The identification of mineral resource areas gives no presumption in favour of the working of any deposits. Within such areas non-mineral development will be strongly resisted unless a resource assessment (or other information) is provided to demonstrate that no exploitable reserves exist within the development site. Where non-mineral development which materially prejudices minerals resources is granted planning permission on land holding minerals deposits, provision should be made for the prior removal of mineral deposits.

Local Planning Guidance Notes

LPG7: Landscape and Development

Landscape issues must be regarded as an integral part of the development process, with consideration given to the form and use of all spaces from the earliest stage. The factors listed below should be considered at any early stage by the applicant, so that information which would be helpful in assessing whether the proposal is acceptable in principle can be identified, as well as those matters of detail which can be reserved' for a further planning application:

- *Existing boundaries*
- *The position of existing trees and whether they are to be retained or removed*
- *The intended uses and treatment of the external spaces*
- *The location of screening factors e.g. buildings, trees etc, within or outside the site*
- *The location of other structures*
- *Any intended changes in landform*
- *The position and general type of planting*

LPG10: Public Open Space on New Housing Development

Public open space makes an important contribution to people's quality of life, providing opportunities for informal recreation and enhancing the visual appearance of an area. The proposal and guidelines which follow have therefore been prepared and adopted by the Council to foster a better standard of design and to clarify methods of financing future maintenance costs. By taking note of the advice contained in this leaflet it is hoped that developers will have a better understanding of public open space requirements and funding. These guidelines cannot cover all situations and applicants and agents are advised wherever the circumstances are unusual to discuss their proposals with a planning or landscape officer prior to the formal submission of an application.

The National Playing Fields Association (NPFA) has proposed a standard of 6 acres (2.43 hectares) of public open space per 1000 population comprising:

- *acres (1.62 ha) of playing fields. These should be suitable for youth and adult use; facilities include pitches, bowling greens, tennis courts and athletics tracks.*
- *1.5 acres (0.61 ha) of informal public open space, such as informal play space and landscaped amenity areas.*
- *0.5 acres (0.20 ha) of children's equipped playground facilities.*

LPG16: Parking

The car parking standards set out are maximum standards for each land use category. In accordance with national policy the Council has no minimum parking requirements. In cases where the amount of parking provided is below the maximum the Council will need to be satisfied that this is appropriate for the likely level of demand, without undermining requirements for inclusive access.

C3 Dwellings: 1 bedroom (1.5 car space per unit); 2 bedrooms (2 car spaces per unit); 3/4 bedrooms (3 car spaces per unit); 5 or more bedrooms (4 car spaces per unit)

Sufficient space to provide at least 2 secure cycle parking spaces per dwelling. In the case of flats, this should be provided via safe and secure communal cycle parking areas.

LPG17: Trees and Development

The purpose of this Local Planning Guidance Note is to amplify Policy EC4 of the adopted Wrexham Unitary Development Plan, regarding the protection of trees and to highlight the benefit of trees as an integral part of development design.

LPG21: Space around Dwellings

This guidance note amplifies policies in development plans on residential amenity. It applies to the construction and conversion of new houses and will form a material consideration in the determination of all relevant planning applications.

It is desirable to make the best possible use of land by increasing housing densities. However, residents are entitled to enjoy a reasonable degree of space, privacy and day-lighting in and around their homes

- factors that are usually termed 'residential amenities'. This note sets out a series of guidelines, to ensure that new development protects residential amenity.

LPG24: Designing Out Crime

Designing out crime rests on achieving the key principles of:

- defensible space - which distinguishes between public, semi-private, and public zones characterised, respectively, by increasing levels of access control and limitation to specific individuals or groups. Physical and/or symbolic barriers define zones, emphasise transition between zones, and discourage unwanted access;*
- territoriality - which identifies certain areas, defined through uniqueness of design or location of community facilities, as the exclusive domain of a particular individual or group. Regular use of such areas fosters a sense of pride and ownership, mutual protection, and belonging which discourages unwarranted intrusion;*
- surveillance - which, resulting from a combination of design, mixed use development, and local social activity, makes potential offenders noticeable and identifiable. Surveillance can be enhanced naturally by minimising visual obstacles and places of concealment or formally through CCTV or security patrols where natural surveillance measures alone cannot adequately protect an area; and*
- building security standards - which, through the installation of security hardware and stronger materials to approved standards, discourages intruder entry.*

LPG27: Developer Contribution to Schools

The following guidelines are designed to give prospective developers an idea of the possible implications of their proposals:

- Every 100 houses produces around 28 primary age pupils and around 20 secondary age pupils.*
- For developments that generate 100 pupils and above consideration will be given to a new school on a new site dependent on location and future growth potential of the area and the applicant will be expected to contribute in proportion to the number of school places the development generates.*

- *The Council will specify the nature of the works or the area which the contribution will finance, which may include a completely new school.*
- *Where a contribution is required, a draft Section 106 Agreement should accompany the planning application. Wrexham County Borough Council's Section 106 templates are available on request from the Planning department.*

LPG28: Affordable Housing

Policy H7 requires an element of affordable housing to be provided on developments of 25 or more dwellings. The Council will normally expect that 25% of the total site capacity to be provided as affordable housing. It will not be acceptable to deliberately subdivide or phase the total development in an attempt to avoid this threshold.

Affordable housing includes:

- *Social rented housing: Housing provided by local authorities and Registered Social Landlords (RSLs)*
- *Intermediate Housing: Housing where the prices or rents are above those of social rented properties but are below market house prices or rents. Options for intermediate housing can include:*
- *Intermediate Rent: Properties purchased at a discount by an RSL and let at a rent that is greater than social rent but less than market rent levels on an assured or assured short hold tenancy.*
- *Shared Equity: Properties where an RSL owns a percentage of a property and the remainder is purchased by the occupier. If the occupier subsequently sells the property the RSLs receives a share of the sale price equivalent to its share of the property. It may also possible for the occupier to buy part or all of the RSL's share over time. The RSL's share of the sales proceeds is recycled to support the provision of affordable housing elsewhere.*

The Council expects affordable housing to be delivered through planning obligations, provided at nil public subsidy. However Social Housing Grant, which is provided by the Welsh Government, may be available for some developments. Developers are advised to contact Affordable Housing Officer prior to the submission of a formal planning application to discuss the availability of Social Housing Grant.

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

The Guidance Note follows the general policy principles set out in Welsh Assembly Government Planning Policy Wales on Design TAN 12 (2002). It is supported by A Model Design Guide for Wales: Residential Development, March 2005, produced by the Planning Officers Society for Wales and the Welsh Assembly Government. The Manual for Streets (Department of Transport March 2007) also provides guidance for people involved in the planning, design, provision and approval of new residential streets.

Well-designed development and the desirable places that it creates to live, need not cost more, but could attract a higher level of market demand. A well thought out and justified design will save you time when you apply for planning permission. Early consultation with planning officers and with neighbours will help to smooth the process and avoid the unexpected. The Council offers a 'Development Team Approach' for larger proposals to help scope the issues and opportunities.

Good design is about working with all elements of the natural and built environment. To create sustainable development, design must go beyond the appearance of a scheme and include social, environmental and economic aspects of the development, its construction and its relationship to its surroundings. 'It is also about creating places we can be proud of'.

Applications of poor design or not justified in the Design and Access Statement will be refused.

LPG32: Biodiversity and Development

Wrexham County Borough possesses an extremely rich and varied array of habitats and species including an extremely dense occurrence of ponds which are of European importance supporting a diversity of important species such as the legally protected great crested newt. The open moorland of Ruabon and Esclusham Mountains are valuable habitats for many upland bird populations and are one of the most important areas for black grouse in Wales. Of particular value are the internationally important lowland meres and mosses sites, the most prominent of which is Fenns, Whixall, Bettisfield and Cadney Mosses National Nature Reserve, covering 948 Ha straddling the Shropshire and County Borough borders.

Many of the County Borough's rare species and habitats are protected by national and international designations. A summary of these and the legislation that protect them can be found in appendices 1

and 2. However, it is also vital that more common species and habitats are maintained and 1 that the contribution of farmland and urban spaces to support biodiversity are not overlooked. Wildlife corridors situated in built up areas or in areas used intensively for agriculture provide important continuous areas for the movement of plants and animals.

The Wrexham Local Biodiversity Action Plan provides the framework for local biodiversity action that will contribute to the delivery of national targets for key habitats and species, and the raising of awareness and understanding of the relevance of biodiversity.

Emerging Local Planning Policy

4.4.4 Further to LDP1 being withdrawn, Wrexham County Borough Council is preparing the Local Development Plan (LDP2), which will replace the current adopted Unitary Development Plan. The LDP will be a long-term land use and development strategy focused on achieving sustainable development and will:

- guide development for housing, employment, retail and other uses;
- set out policies that will be used to decide planning applications; and
- safeguard areas of land requiring protection or enhancement.

4.4.5 At this juncture, there is no draft documentation to make reference to. The Council have a delivery agreement and have undertaken a call for sites only.

Wrexham County Borough Council Joint Housing Land Availability Study (JHLAS) (2013)

4.4.6 The latest Wrexham County Borough Council Joint Housing Land Availability Study (JHLAS) for 2013 presents the housing land supply for the area at the base date of 1st April 2013.

4.4.7 The JHLAS was prepared in accordance with the requirements of the relevant policy documents including Planning Policy Wales (Edition 5, November 2012), Technical Advice Note 1 (TAN 1) and the Guidance Note on the JHLAS process (Version 2 September 2012).

4.4.8 The JHLAS sets out details of the housing land supply and how it has been calculated. It shows that based on the past completions method set out in TAN 1, Wrexham County Borough Council has a housing land supply of 3.4 years. This is set out in the table below:

Overall total 5 year land supply (large + small sites) is 1551 units (1053 + 498).

Table 3 – 5 Year Land Supply Calculation (Past Completions Method)

A	Total Previous 10 Year Completions (2003 – 2013)	4474
B	Average Annual Completions = (A / 10)	447
C	Total 5 Year Land Supply	1551
D	Land Supply in Years = (C / B) rounded to one decimal place	3.4 years

4.4.9 The Wrexham JHLAS indicates that there is not a 5 year supply of housing within the Wrexham area.

5.0 PLANNING MERITS

Strategic Policy

- 5.1 A Planning Inspector held a series of hearing sessions during the early part of 2012 as part of the Examination into the Wrexham LDP (1). During the sessions the Inspector identified a number of issues with the Plan, principally in respect of the housing supply figures proposed by the Council (considerable shortfall) and the associated restrictive strategy on the location of future development and the impact upon the delivery of affordable housing.
- 5.2 Given the fundamental changes that would have been required to address the fundamental issues, it was recommended that the Plan be withdrawn. This is the approach that has been taken by the Council.
- 5.3 Selected fundamental concerns are summarised as follows:
- A significant shortfall in the supply of housing and the associated conflicting Plan strategy to confine general housing to within settlement boundaries.
 - A failure to take reasonable steps to secure an appropriate supply of affordable housing.
 - A failure in the Plan to respond to its own evidence base.
- 5.4 It was accepted at the hearing that there was no reason to believe that the character of the County was such that it could not accommodate any expansion of settlements.
- 5.5 The Council accepts that delivering the scale of housing suggested by the Inspector would require allocating sites outside settlement limits. Accordingly the previously pursued strategy of confining development to within existing settlement limits requires reconsideration.
- 5.6 TAN 1 provides guidance on the preparation of Joint Housing Land Availability Studies (JHLAS). The purpose of these studies is to monitor the provision of market and affordable housing, provide an agreed statement of residential land availability for development planning and control purposes; and set out the need for action in situations where an insufficient supply is identified.
- 5.7 As noted above the Wrexham JHLAS indicates that there is not a 5 year supply of housing within the Wrexham area.

- 5.8 Paragraph 5.1 of TAN 1 (situations where supply is below 5 years) explains that:

“Where the current study shows a land supply below the 5 year requirement, the need to increase supply should be given considerable weight when dealing with planning applications, provided that the development would otherwise comply with national planning policies.

In addition, local planning authorities must take steps to increase the supply of housing land. This may include reviewing the development plan, releasing land in its ownership, expediting planning applications or securing the provision of infrastructure for particular sites, which prospective developers may be prepared to finance in whole or in part.

The local planning authority must include a statement in the JHLA study outlining the measures it is taking to address the shortfall in housing land supply.”

- 5.9 Hence, despite being outside the current development boundary, it is submitted that the planning application should be considered in the context of the presumption in favour of sustainable development in line with Planning Policy Wales. On this basis the scheme will assist in delivering houses within the framework of TAN 1 and national planning policies.

- 5.10 In order increase the supply of housing land in the short term the Council need to grant planning permission for residential development. Notably, the Wrexham County Borough Council Joint Housing Land Availability (JHLAS) Study for 2013 acknowledges that this is the only viable alternative to increase housing land supply in the short term. The document states at paragraph 3.5 that:

“The Council will give appropriate consideration to any applications that may be submitted for residential development outside of existing settlements. It must be stressed, however, that the Council cannot guarantee that any such applications will be approved simply because they contribute to the land supply. The need to increase the 5-year supply will not override the need to take account of all other planning constraints and material considerations. Any applications will be carefully considered on their own individual merits together with the potential contribution that such development can make to the overall housing land supply”

- 5.11 The application seeks to assist in the increase in the supply of housing land within the Wrexham County Borough area in line with the requirements of Planning Policy Wales and TAN 1.

Site-specific / Development Management Policy

- 5.12 It must be acknowledged that the planning application is submitted in outline only, with all matters reserved except for access. Accordingly, in view of the limited level of detail known at this stage, a judgement must be made in the determination of the application against site-specific / Development Management policies. A full Environmental Impact Assessment has been undertaken for the purpose of this planning application, accordingly the following items have been addressed as part of this process:

- Archaeology / Heritage
- Landscape & Visual
- Flood Risk / Drainage
- Ground Conditions
- Ecology/Biodiversity
- Transport
- Noise
- Arboriculture
- Mineral Resource
- Agricultural Land Quality
- Socio Economics & Community

- 5.13 You are directed to the separately submitted Environmental Statement and associated technical appendices to ascertain a full assessment of each of the above items in the context of this planning application for residential development (up to 400 units).

6.0 SUMMARY & CONCLUSIONS

6.1 As a guide to the suitability of the site for major residential development it is fair to cross-reference National Policy and the associated criteria that should be used in deciding which types of land to allocate for housing. It is submitted that the site performs extremely well in relation to each of the criteria as follows:

- The location and accessibility of the site to jobs, shops and services by modes other than the car is good.
- In view of the limited number of settlements within the Borough and ongoing reduction of land availability within the settlement limits, we submit that there will be a need to release sites on the edge of sustainable settlements.
- The capacity of existing physical infrastructure (including water and sewerage and other utilities) and social infrastructure is sufficient to absorb new development.
- The provision of a mix of house types including affordable housing for local needs will help to build sustainable communities.
- The physical and environmental constraints of development, including flood risk, landscape and biodiversity have been taken into account.
- The compatibility of housing with adjoining uses (which is predominantly housing) is good with limited potential for conflict.

6.2 *Planning Policy Wales* (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs). Procedural advice is given in circulars and policy clarification letters. It translates the Welsh Governments' commitment to sustainable development into the planning system so that it can play an appropriate role in moving towards sustainability. The general objectives of the housing section are summarised as follows:

- Use of previously developed land in preference to Greenfield sites.
- The most efficient use of land.
- Well-designed living environments, where appropriate at increased densities.
- Planning policies and decisions, including the provision of adequate land, have an important role to play in the preparation of housing strategies.
- Local planning authorities should ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing.

- 6.3 Selected fundamental concerns were raised by a Planning Inspector at the Examination of the LDP (1), leading to the Development Plan being withdrawn, are summarised as follows:
- A significant shortfall in the supply of housing and the associated conflicting Plan strategy to confine general housing to within settlement boundaries.
 - A failure to take reasonable steps to secure an appropriate supply of affordable housing.
 - A failure in the Plan to respond to its own evidence base.
- 6.4 It was accepted by the Council that there was no reason to believe that the character of the County was such that it could not accommodate any expansion of settlements. The Council accepts that delivering the scale of housing suggested by the Inspector would require allocating sites outside settlement limits. Accordingly the previously pursued strategy of confining development to within existing settlement limits requires reconsideration.
- 6.5 It is submitted that, in relation to the broad location of development and the proposed housing numbers, additional housing land allocations are required outside settlement limits for the purpose of the emerging LDP 2011-2028. The land east of Tan y Bont main road, Rhosrobin presents such an opportunity and has been put forward as a Candidate Site as part of the Council's first consultation exercise for the emerging LDP (2). In light of the extended timeframe associated with the adoption of the LDP (2) and the associated current position that the Council are faced with in respect of a 5-year housing land supply, it is submitted that the land is correct to be considered through a formal planning application, which should be supported in the context of the presumption in favour of sustainable development in line with Planning Policy Wales.
- 6.6 The site is well related to a number of local service centres such as Pandy, New Rhosrobin, Little Acton and Croes Eneurys. These centres provide the full range of local services and facilities inclusive of schools, shops, post office, public houses, community hall, churches, recreation facilities etc.. All local service centres are easily accessible by means of transport other than the private car, e.g. pedestrian links, cycle links and frequent local bus service.
- 6.7 The outer limits of both the conurbation of Wrexham town centre is within 1.5 km of the proposed site. The Rhosddu Industrial Estate lies directly adjacent to the proposed housing site and there are further employment land sources within 0.5 km of the proposed site at Stansty. All associated areas being easily

accessible by means of transport other than the private car, e.g. pedestrian links, cycle links and frequent local bus service.

6.8 The site is within proximity to both local service centres and employment sources that are accessible on foot and cycle. The wider environment of the Borough and the adjoining administrative areas are accessible by public transport, via regular bus services, namely the 32 and 33 Arriva service, the 34 GHA Service, and 28A Townlynx Service. There are bus stops in close proximity to the site, and rail links to major destinations from Wrexham train station. There is also a local rail service from Wrexham to Bidston with a station at Gwersyllt, which is approximately 1 km from the proposed site.

6.9 We believe that the proposal would result in the creation of a sustainable urban extension, meeting the aims and objectives of national policy as follows:

- To provide a greater choice for people over the type of housing and the location within which they live.
- To provide appropriate edge of settlement developments with a mix of affordable and market housing.
- To locate development where it is easily accessible by public transport, walking and cycling to local jobs, shops, services etc.
- To assimilate development into the landscape through appropriate mitigation measures.
- To enhance biodiversity.
- To make an efficient use of land through the provision of a mix of house types at a density appropriate to the surrounding locality and character of the area.
- The site represents a sustainable location and is well related to wider area containing a number of local service centres and extensive employment sources.

Appendix A

Statement of Consultation

Pre-application enquiry

- The applicant has been through the Council's formal **pre-application advice service** and has paid the associated requisite fee. The service entailed two meetings with officers of the Council, representing Development Management, Planning Policy, and a host of in-house statutory consultees.
- The content of the planning application and decision to come forward with a formal proposal is based upon the dialogue maintained with the relevant officers at the pre-application enquiry stage.

Environmental Impact Assessment

- The formal procedure of screening and scoping, in accordance with the Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 1999 (as amended) has been applied for the purpose of this planning application.
- Through receipt of a formal **Screening Opinion** from Wrexham Council it was confirmed that the development proposal would need to be the subject of an Environmental Impact Assessment (EIA).
- Through receipt of a formal **Scoping Opinion** from Wrexham Council, the key items for consideration within the EIA were confirmed as follows: Archaeology / Heritage; Landscape & Visual; Flood Risk; Ground Conditions; Ecology/Biodiversity; Transport; Noise; Air Quality; Arboriculture; Mineral Resource; Agricultural Land Quality; Socio Economic

Community Consultation

- Through the Council's Strategic & Performance Director, Lee Robinson, a dialogue was opened with Councillors Bernie McCann and David Griffiths (both representing Gwersyllt East/South), and an open invitation put forward by the applicant to meet with the Councillors to discuss the context of the proposals and its important facets. This invitation was not taken up but remains open, should the Councillors wish to meet after the planning application has been submitted.