CIVITAS
Planning Limited

Proposed Development:

27 no. affordable apartments on land at the former Ebeneser Chapel, 2 Chester Road, Wrexham, LL12 7AD

Pre-application Consultation Report

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1.0 Introduction

1.1 In accordance with Article 1 of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (hereafter referred to as 'the Order') the Applicants (Wales & West Housing Association) have undertaken a pre-application consultation exercise in respect of the proposed planning application. The Applicant has engaged Civitas Planning Limited to act as Planning Agent.

1.2 The draft planning application proposed:

27 no. affordable apartments on land at the former Ebeneser Chapel, 2 Chester Road, Wrexham, LL12 7AD

1.3 In accordance with the Order the proposed application was publicised locally and owner/occupiers of adjoining properties, community consultees and specialist consultees were contacted directly. In each case details were provided of how the draft application documents could be viewed and how representations could be made to the Agent acting on behalf of the Applicant and the timescale for doing so.

1.4 In accordance with the Order this Pre-application Consultation Report details the extent of the exercise, the representations received and how these have been addressed by the developer.

2.0 Formulating the Consultation Strategy

2.1 The primary aim of developing the consultation strategy was to ensure that people are consulted and provided opportunity to comment on development that will affect them.

2.2 The development site extends to 0.933ha and a total of 27 new dwellings are proposed. It is not considered that this a significantly large development proposal, but the development will have a direct impact on the occupier of the dwelling that adjoins the application site and, because the site occupies a relatively prominent location relative to municipal buildings and public footpath the development will also effect people who access this area.

2.3 It is considered that the level of interest in the proposal will reduce with distance from the site and that persons who are not directly impacted by the proposal will have significantly less interest in the development proposal. However, given the affordable nature of the proposed dwellings it is expected that there will be some interest in this particular social aspect from the wider community.

2.4 The relatively straightforward nature of the development has prompted the decision to wait until all draft planning application documents were available prior to undertaking consultation. The application is supported by a number of professional studies and assessments and the Applicant considers that the reports have been drafted in a manner such that those without professional knowledge of the subject areas will still be able to readily understand the content and therefore gain a sufficient understanding of the proposal.

2.5 Given the conclusions above about the significance of the proposal and those likely to be affected by it was considered appropriate to contact the adjoining occupiers/land owners and to advertise the consultation through the erection of a series of site notices within the vicinity of the site. This goes beyond the minimum extent of consultation required by the Order (adjoining owners and occupiers) but it is considered that the likely level of interest from people who access the area for work, education, leisure purposes etc warrants communication beyond simply a single notice on the site boundary.

2.6 In addition to a Notice at a prominent location on the boundary of the site on Chester Road, it is considered appropriate and beneficial to erect notices on the opposite side of Chester Road, on the public footpath to rear boundary of the site, and in the vicinity of the was memorial/public car park south of the application site. It is considered that this will increase opportunity of the Notice being seen by passing members of the public.

2.7 Consulting community consultees also assists with engaging the public and raising awareness of the scheme. Direct engagement with community consultees is beneficial to the consultation process. The application site lies in Acton and Maesydre Ward and the members for the ward are Cllr Jarvis and Cllr Martin. The site lies with the Acton Community Council area, and they too will be consulted as is required.

2.8 As set out above the timing of this consultation has been reliant on the availability of the draft application documents and ensuring that a sufficient level of information is available to allow the public to have a reasonable understanding of the whole project. As it stands, we are of the view that the documents consulted upon, albeit in draft, are sufficiently detailed to meet validation requirements were they formally submitted; the Applicant has waited until this stage to consult because we want this to be as effective a consultation exercise as possible.

2.9 In order to ensure that the consultation process is clear and transparent the formal notices will be delivered along with a covering letter that is drafted in such a manner as to encourage engagement in the process in order to gain a better and more balanced response.

2.10 The covering letter will be drafted in plain language, avoiding unnecessary reference to complicated legislation or use of acronyms. The public will be openly and warmly invited to make comments on the application at both the pre- application stage (by the developer) and the post-validation stage (by the LPA) and the difference in the varying phases of consultation will be made clear to the public.

2.11 To ensure the process is engaging for all, while the draft documents have been produced in English, all consultation notices and covering letters will be erected/sent bilingually and the Applicant has sought out a bilingual planning consultancy so that engagement in either Welsh or English can be had.

2.12 The Notices and covering letters will advise members of the public that a copy of the documents is available to view online and provide them with the web address. The covering letter and notice will also make clear that if internet access is unavailable, and a resident is unable to access the facilities at the local library then the Agent can be contacted, and best endeavours will be made to make alternative arrangements.

2.13 In addition to consulting the public and community consultees, specialist consultees will also be consulted in accordance with the requirements of the Order. These consultees are largely more familiar with the planning process and the reasons for why they are being consulted. A website link to the

documents will be provided by email, along with a copy of the requisite notice, and the covering email will introduce the proposal and provided details on how responses can be made.

2.14 The specialist consultees have been determined by reference to Schedule 4 of the Order and the following will be consulted:

Welsh Government Highways
Local Highways Authority
Dwr Cymru
Fire and Rescue Service

2.15 The Notices and covering letters supplied to members of the public and community and statutory consultees will advise that comments can be submitted to the Applicant's Agent via email or post at the following addresses:

- Civitas Planning Ltd c/o Bradshaws, 2 Well House Barns, Chester Road, Bretton, Flintshire, CH4 0DH
- rachel.thornley@civitasplanning.com

2.16 In the event that a person didn't have internet access at home the Notices and covering letters advise that computer facilities are available to the public at Wrexham Library, Rhosddu Road, Wrexham, LL11 1AU. The Notice also sets out the opening times of the library.

2.17 The draft application consists of the following documents:

Draft Application Form

Statements	
Supporting Planning Statement	dated – June 2024
Design and Access Statement	CREU-C431
Highways	
Transport Statement	J000586TS01a
Ecology	
Ecological Desk Study	Reference: 10835.001
Preliminary Ecological Assessment	Reference: 10835.002
Landscape Matters	
Arboricultural Impact Assessment	Ref: 25/AIA/WXM/331
Arboricultural Method Statement	Ref: 25/AMS/WXM/331

Green Infrastructure Statement (inc. Landscape Proposals)	June 2025 (VS 1)
Drainage	
Drainage Strategy	16744/2200-P01
Site Sections	16744/2250-P02
Road Vertical Alignment	16477/2252-P01
SAB Approval Pre-app form	
Network Details	dated 4 June 2025
Site Survey	
Site Survey	B0703-4877-01-01-01
Red Line Survey	B0703-4877-01-0102-01
Topographical Survey	PMS24197-01 RevA
Utility Survey	PMS24197-02

Drawings:

Location Plan	2025.01.27 001-D
Existing Site	2025.01.27 002-D
Proposed Site	2025.01.27 006-F
Proposed Site North East Axo	2025.01.27 007-F
Proposed Site South West Axo	2025.01.27 008-F
Proposed Site Sections 01	2025.01.27 009-F
Level 00 Proposed Plan	2025.01.27 020-K
Level 00, 01, 02 Proposed Plans	2025.01.27 021-D
Elevation Proposed – Sheet 1 of 2	2025.01.27 022-E
Elevation Proposed – Sheet 2 of 2	2025.01.27 023-C

3.0 Publicity before applying for planning permission

3.1 In accordance with 2C of the Order the Applicant publicised the proposed application by displaying a site notice, in a form substantially to like effect to the form specified in Schedule 1B to the Order, at locations on the boundary of the site and in one other location within the vicinity of the site. Notices were in place on site from 12th June 2025 to when they were removed by the Applicant's Agent after the end of the consultation period. Notices were checked periodically and no replacements were required.

3.2 The Notice was produced in both the English and Welsh language and a copy of the Notice and a map detailing the locations in which the Notice was erected is presented at Appendix A.

3.3 In accordance with 2C of the Order the owner/occupiers of land adjoining the land to which the proposed application relates, and to a number of properties beyond the boundary with the application site, were written to and a copy of the letter is provided at Appendix B. This letter was accompanied by a copy of the Notice attached at Appendix A. The addresses to which these were hand delivered are provided in Appendix C. The notice and covering letter was also sent by post to Wrexham County Borough Council.

4.0 Consultation before applying for planning permission

4.1 In accordance with 2D of the Order community consultees and the appropriate specialist consultees were consulted.

4.2 Copies of the correspondence sent to Community Consultees is provided at Appendix D, as is a copy of the Notice provided. The Community Consultees were also provided with a web link to the draft application documents.

4.3 A copy of the email sent to Specialist Consultees is attached at Appendix E, this was accompanied by the Notice, also contained at Appendix E, which follows the form set out at Schedule 1C to the Order. The email was sent to the following addresses for the attention of the consultees identified at para.2.14 above.

northandmidwalesdevelopmentcontrolmailbox@gov.wales
environmentaladmin@wrexham.gov.uk
developer.services@dwrcymru.com
flintshire.wrexham@nwales-fireservice.org.uk

5.0 Responses Received

5.1 Community and Specialist Consultees were provided with a link to the application documents via email.

5.2 Representations were received from the following specialist consultees (Appendix F):

Welsh Government Highways
Dwr Cymru
Fire and Rescue Service

5.3 Consultation responses were also received from the Council's Waste Strategy Officer, Building Conservation Officer and Environmental Health Officer (Appendix F).

5.4 A consultation response was received from one community consultee (Appendix G) and no members of public commented on the proposal.

6.0 Response to representations received

6.1 In accordance with 2F of the Order this Pre-application Consultation Report details in this Chapter a summary of the issues raised and includes confirmation of where the issues raised have been addressed and if so how.

Consultation Responses from Specialist Consultees and Community Consultees

6.2 The responses received are dealt with in turn below:

Welsh Government Highway Authority

6.3 The response received advised that that the Welsh Government do not wish to comment on the proposals and the Applicant considers no action is required in response to the comments received.

Fire and Rescue Service

6.4 The Fire and Rescue Service have advised they have no comments to make at this stage and no action is therefore required.

Dwr Cymru

6.5 In relation to surface water drainage Dwr Cymru advise engagement with the SuDS Approval Body and that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system. The Applicant considers that the proposed drainage scheme addresses the

comments raised in respect of run-off and once the scheme is agreed in principle with the SAB, will liaise further with Dwr Cymru as required.

6.6 In respect of foul drainage Dwr Cymru has advised that there is capacity within the public sewerage system, have specified where the connection should be made and that additional consents may be required. The Applicant is satisfied that the comments can be readily accommodated within the foul drainage scheme proposed.

Waste Strategy Officer

6.7 The Council's Waste Strategy Officer has advised of the refuse storage requirements for a development of this scale and the proposed plans will be revised to accommodate sufficient area to create bin stores of this scale. The Officer has said refuse vehicles will need to be able turn within the site however this isn't feasible and the extant permission doesn't allow for this either. The application will therefore continue to propose a bin store to the south of the site, accessed for collection from Chester Road.

Building Conservation Officer

6.8 The consultation response from the conservation officer raises no objection in principle but does raise concerns about the design suggesting that there is scope to be bolder, use contemporary shapes and materials as opposed to referencing traditional forms. The Applicant is not proposing any alterations to the proposed design as they are of the view that this scheme is a marked improvement on their fallback, the implementation of the extant planning permission.

6.9 The design seeks to be unobtrusive, aligning with neighbouring built forms and scale, rather than being a dominant form. The massing is located centrally in the site and mature vegetation is retained to assist in softening the impact of development, supplemented by landscaped buffers along the boundaries to create a form that relates appropriately to the adjacent properties and a design that reflects the modest nature of the development and creates a legible form in this mixed use area.

Environmental Health Officer

6.10 The environmental health officer's response recommends that the subsequent planning application is accompanied by a noise assessment. The Applicant does not think this is necessary given there is extant permission for residential development on this site. The consultation response makes no reference to the fallback position and so it may be that the officer is unaware that permission already exists to create dwellings on this site.

Cllr Martin

6.11 The consultation response from Cllr Martin was supportive of the proposals but she did have a series of questions about how the proposal had been developed and how it differed from the extant permission and the effect of this. Cllr Martin was particularly keen to understand how parking spaces would be allocated and asked if the Applicant would be open to working with the Council to utilise neighbouring public parking if undersupply were an issue for occupants. The Applicant would be content to enter into discussion if this was deemed necessary, however they don't consider this will be an issue given their extensive experience of operating similar sites, knowledge of car ownership rates between their tenants and due to the sustainable location.

6.12 As is set out in the table above, the draft proposals have been guided by professional assessments and advice received. In relation to the matters raised during consultation it is considered that amendments to the proposal are required to increase the scale of the proposed bin store and further justification will be provided in resect of the proposed design.

7.0 Conclusions and Feedback

7.1 This site and the application proposal have now been the subject of public consultation. No comments were received from local residents and responses from community consultees and specialist consultees numbered seven.

7.2 Following the receipt and review of comments made the Applicant has considered these and will now progress to make a formal planning application.