

PLANNING, DESIGN AND ACCESS STATEMENT

Land at Mold Road, Gwersyllt, Wrexham

Prepared on behalf of

The Applicant – Castle Green Homes

September 2026



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1 INTRODUCTION

- 1.1. This Statement has been prepared by Grimster Planning on behalf of our Client, Castle Green Homes (hereafter referred to as the “Applicant”).
- 1.2. The Statement is submitted in support of a detailed planning application (hereafter referred to as the “Application”) submitted to Wrexham County Borough Council for the proposed development of Land at Mold Road in Gwersyllt, Wrexham (hereafter referred to as the “Site”).
- 1.3. The description of development for which detailed planning permission is sought comprises the following:

“Residential development at Land at Stansty Fields, Mold Road, Gwersyllt, Wrexham, LL11 4AX”

- 1.4. The Application comprises a number of supporting plans and drawings, and technical reports, which should be read alongside this Statement as documented in *Table 1* below:

Table 1: Application Package

Technical Report	Author	Reference / Date
Location Plan	Castle Green Homes	MRGWR-LP.01
Site Layout	Castle Green Homes	MRGWR-SP.01 Rev. N
House Types	Castle Green Homes	Various
Refuse Collection	Castle Green Homes	MRGWE-SP.REF.01 Rev. O
Affordable Housing Delivery Statement	Castle Green Homes	September 2026
Topographical Survey	Carl Williams Land Surveys	B444-00.01
Landscape Plans	Ascerta	P.1626.22.03 Rev. I
Planting Plan	Ascerta	P.1626.22.05 Rev. I
Landscape and Ecological Management Plan	Ascerta	February 2025 (updated in September 2026)
Green Infrastructure Statement	Ascerta	September 2026
Highways Technical Note	SCP	September 2026
Transport Statement	SCP	September 2026
Arboricultural Impact Assessment	Ascerta	April 2022 (updated in September 2026)

Flood Consequences Assessment and Drainage Strategy	Coopers Consulting Engineers	September 2026
Nutrient Assessment	Brookbanks	13389 TN01 Rv1 NA
Shadow Habitats Regulations Assessment	UES	NGR: SJ 3221 5253
Preliminary Ecological Appraisal	Ascerta	March 2022
Bat Activity Survey and Static Detector	Ascerta	June 2026
Breeding Bird Survey Report	Ascerta	August 2026
Water Vole Survey Report	Ascerta	July 2026
Bird and Bat Box Plan	Castle Green Homes	P.1626.22.06 Rev. B
Great Crested Newt Mitigation Strategy	Ascerta	June 2026
Noise Assessment	Hepworth Acoustics	June 2026
Air Quality Assessment	Redmore Environmental	June 2026

- 1.5. In accordance with the statutory requirements set out in Welsh Government Guidance, the Applicant has undertaken pre-application consultation for the proposed 'major' development (by virtue of its scale in excess of ten dwellings).
- 1.6. To guide this process, the Applicant has established a dedicated website on which to make details of the proposed development and the aforementioned Application documentation available to view <https://planning.castlegreenhomes.uk>. In accordance with the statutory guidelines, the Applicant has also issued formal correspondence to consultees and adjoining landowners and advertised/displayed detailed of the Application by way of a site notice. Further details, including the feedback/comments received and how these have been addressed by the Applicant, will be documented in the Pre-Application Consultation Report submitted with the Application.

2 SITE CONTEXT

- 2.1. This Section of the Statement provides details of the Site, namely its location, description, and locational sustainability.

Site Location

- 2.2. The Site lies in the administrative area of Wrexham County Borough Council. It lies within the *Ward* of Gwersyllt South.
- 2.3. The location plan of the Site is provided at *Figure 1* below:

Figure 1: Location Plan



Source: Site Location Plan Drawing Ref. MRGWR-LP.01

- 2.4. The Site is located at the south-eastern edge of the settlement of Gwersyllt, which is identified as an Urban Village in Wrexham County Borough Council's adopted Unitary Development Plan.

- 2.5. As a settlement, Gwersyllt benefits from very good connectivity to Wrexham Town via the highway network, the centre of which lies c. 2.2km from the Site.
- 2.6. In respect of its surroundings, the eastern boundary of the Site is formed by vegetation/trees, beyond which lies the Wrexham-Bidston railway line. To the north lies existing residential development on St Giles Park.
- 2.7. To the west of the Site lies the A541 Mold Road. The land to the south is agricultural in nature, separated from the Site by an existing hedgerow/tree belt.
- 2.8. There are existing and well-established hedgerows at all boundaries of the Site which provide for a strong sense of containment; these lend the Site to development. The existing landscape features will be retained as much as possible, albeit some small-scale removal is required to facilitate the proposed development as documented later in this Statement. Compensatory planting will be provided as part of the proposed development as shown on the submitted Landscape Plans.

Site Description

- 2.9. The net Site area extends to 1.88 hectares (gross 3.13 hectares). It comprises a single agricultural field used for grazing purposes.
- 2.10. Vehicular access to the Site is currently available via the land/field to the south. Future direct access into the Site will be provided via the creation of a new vehicular and pedestrian access from the west off Mold Road, designed to adoptable standards. The proposed site access is located at the point where the speed limit on Mold Road increases to 50mph, with street lighting and footways to facilitate safe vehicular and pedestrian movements. The speed limit to the north of the Site is reduced to 40mph on the exit from St Giles Park roundabout.
- 2.11. The topography of the Site has been taken into account in the preparation of the Site Layout.
- 2.12. The Site lies wholly within Flood Zone 1 based on the latest Natural Resources Wales '*Flood Maps for Planning*' and thus is deemed to be at low risk of flooding.
- 2.13. The Site is not located within a Conservation Area.
- 2.14. The nearest heritage assets to the Site are:
 - **Lower Stansty Farmhouse**, a Grade II listed building located c. 200m to the south-east of the Site at its nearest point; and

- **Stansty Park with Garden Gateway**, a Grade II heritage asset located to the west of the Site, beyond Mold Road.

- 2.15. There will remain a permanent physical and visual separation between the proposed development and these heritage assets post-development (owing to intervening vegetation, infrastructure, topography (which gradually slopes down from west to east), landform/land-uses and the proposed layout). Accordingly, it is not considered that the proposed development of the Site would cause harm to the setting and significance of these 2 no. heritage assets.
- 2.16. There is no tree coverage within the developable area of the Site. The Site boundaries currently comprise established hedgerows and trees as shown on Drawing Ref. P.1626.22.01F included at Appendix 2 of the accompanying Arboricultural Impact Assessment (AIA). All trees at the periphery of the Site are protected by Tree Preservation Order No. 130 (2008), and Tree Preservation Order No. 155 (1995).
- 2.17. There is an existing footpath along the western boundary of the Site on Mold Road. The proposed new Site access will comprise 3m cycle/footways to provide a safe connection to this existing footway network to the west (which is the direction that the majority of people will travel for local services). There are no existing Public Right of Ways across or adjacent to the Site.

Locational Sustainability

- 2.18. In order to appraise the locational sustainability of the Site, we have considered the location of the Site relative to the everyday needs of future residents and access to key services. Further details are provided in Section 4 of the accompanying Transport Statement.

Access to Education

- 2.19. The catchment Primary School to the Site is Gwersyllt Community Primary School located in a north-easterly direction from the Site on Dodds Lane. It lies c. 1.3km from the Site via Mold Road, Hope Street and Dodds Lane. The proposed footpath connections from the Site linking to the existing footpath on Mold Road will provide for safe pedestrian movements to and from the Site to the School and the wider area.
- 2.20. The nearest Secondary School to the Site is Ysgol Bryn Alyn located on Church Street in Gwersyllt, c. 1.2 km from the Site.
- 2.21. Overall, the Site benefits from excellent access to primary and secondary education, and which is accessible via sustainable modes of travel.

Access to Shops and Services

- 2.22. There are a number of shops in Gwersyllt, including those at Gwersyllt Retail Park on Dodds Lane, c. 1.2km from the Site. Available retail provision includes a supermarket, convenience stores, coffee shop, Post Office, restaurants/take-aways, and hair and beauty amongst others. Gwersyllt also benefits from public houses, a petrol filling station and places of worship.
- 2.23. Overall, the Site benefits from good access to local facilities to serve the everyday needs of future residents.

Access to Public Transport

- 2.24. The nearest bus stops to the Site are located along Old Mold Road, approximately 250m walking distance to the west of the Site access. The nearby bus stops are located within the recommended walking distance of 400m. The bus stops are served by the No. 27 bus service which runs hourly Monday to Saturday between approximately 06:00 and 17:30.
- 2.25. There is an existing railway station in Gwersyllt, located c. 1.2km from the Site along Mold Road and Hope Street. This station provides daily services to Wrexham Central and Bidston, via Buckley and Hope, from where onward connections can be made. A reduced service operates in the evening, weekends and bank holidays. This can be accessed via the No. 27 bus service.
- 2.26. Further details of public transport services can be found in Section 4 of the accompanying Transport Statement.

Access to Healthcare

- 2.27. There are existing medical centres/GP practices and dental surgeries in Gwersyllt/Summerhill to provide healthcare services to local residents.
- 2.28. Furthermore, there are existing dental practices in Gwersyllt.

Access to Leisure / Recreation

- 2.29. The Gwyn Evans Leisure and Activity Centre is located c. 2.1km from the Site, in a northerly direction, on Heol Cefn. This provides access to a swimming pool, gymnasium and sports hall.
- 2.30. Stansty Park lies to the west of the Site, beyond Mold Road, which is publicly accessible.

- 2.31. The nearest existing equipped area of play to the Site can be found to the immediate north-east, accessible on foot off St Giles Park within a short walking distance via Mold Road. This will complement the public open space to be provided as part of the proposed development.
- 2.32. Overall, the Site enjoys excellent access to leisure and recreation facilities within an accessible distance, and which together offer a significant health and well-being benefit to future residents of the proposed development.

Summary

- 2.33. Overall, the Site benefits from excellent sustainability as confirmed in Section 4 of the accompanying Transport Statement. The Site's housing allocation in the now withdrawn Replacement Wrexham Local Development Plan (2013 – 2028), as documented later in Section 5 of this Statement, offers a further demonstration of how the Site has previously been found by both the Council and the Local Development Plan Inspectors to be suitable and sustainable for the proposed land-use and scale of development proposed as part of this Application.

3 PLANNING HISTORY

- 3.1. There is no planning history associated with the Site which is relevant in the determination of this Application.

4 PROPOSED DEVELOPMENT

- 4.1. This Section of the Statement provides details of the proposed development for which detailed planning permission is now sought.

Use

- 4.2. This Application seeks detailed planning permission for the following:

“Residential development at Land at Stansty Fields, Mold Road, Gwersyllt, Wrexham, LL11 4AX”

Amount

- 4.3. The proposed development will comprise 83 no. dwellings (Use Class C3). All of the proposed dwellings will be of an affordable tenure in perpetuity.
- 4.4. There will be a sub-station located to the west Plot 7, and a pumping station located to the north of the proposed public open space and local equipped area of play.
- 4.5. Further details are shown on Drawing Ref. MRGWR-SP.01 Rev. N submitted for approval.

Housing Mix, Density and Floorspace

- 4.6. The proposed development will comprise the following housing mix:
- 6 no. 1-bed ground floor apartments;
 - 6 no. 1-bed first floor apartments;
 - 2 no. 2-bed bungalows
 - 43 no. 2-bed semi-detached houses;
 - 9 no. 3-bed semi-detached houses;
 - 8 no. 3-bed corner-turner houses;
 - 4 no. 4-bed semi-detached houses; and
 - 5 no. 4-bed detached houses
- 4.7. In respect of the overall split of the proposed housing mix, this comprises the following:
- 14.5% 1-bed apartments;
 - 54% 2-bed bungalows and semi-detached houses;
 - 20.5% 3-bed semi-detached houses and corner-turners; and
 - 11% 4-bed semi-detached and detached houses, including corner-turner.

The proposed affordable housing tenure split will be intermediate rent and social rent, in accordance with Wrexham County Borough Council approved tenure requirements.

- 4.8. The proposed net density across the Site will be 44.20 dwellings per hectare.
- 4.9. The cumulative net footage across the Site will equate to 3,678.35 square metres per hectare.
- 4.10. The total combined proposed floorspace of the 83 no. dwellings will equate to 74,347 square feet.

Scale and Massing

- 4.11. The proposed dwellings will be a maximum of two-storeys in height, reflective of the typical prevailing local character found to the immediate north of the Site. The 2 no. 2-bed bungalows will be single storey.
- 4.12. The proposed mix of dwellings (as set out in paragraph 4.6 above) allows for a layout such that it does not create issues of massing which would be out-of-keeping with the local character.

Layout

- 4.13. The proposed Site Layout is shown on *Figure 2* below.

Figure 2: Proposed Site Layout



Source: Drawing Ref. MRGWR-SP.01 Rev. 0

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- 4.14. The Site Layout has been designed as a sympathetic and logical extension to the settlement, to the south of existing residential development on St Giles Park, and Mold Road to the west. It comprises a naturally contained parcel of land.
- 4.15. The Site Layout has taken account of the topographical characteristics of the Site such that all of the proposed dwellings will be no more than 2-storeys in height.
- 4.16. Plots 7 to 13 and 75 to 83 will positively address the proposed internal access road at the Site entrance off Mold Road. The only properties that front on to Mold Road are plots 1 to 6, albeit these are set back from Mold Road and served by an internal private drive off the main access road. This will minimise any issues relating to road noise/pollution and amenity for future occupants.
- 4.17. The layout has been designed to provide for the efficient use of the land to deliver 83 no. new homes, with only a limited number of private gardens backing on to the southern Site boundary. The remainder of the properties around the edge of the Site have been designed to be outward looking/facing where possible.
- 4.18. There is some limited use of private driveways throughout the Site. These align with the Council's standards in respect of the maximum number of dwellings that each would serve.
- 4.19. The affordable homes have been pepper-potted throughout the proposed development, and these properties will be indistinguishable in their appearance from the open market homes.
- 4.20. The house and plot sizes incorporate a mix of apartments, bungalows, semi-detached and detached properties in response to identified local housing needs.
- 4.21. The layout has respected the Council's required separation distances and has sought to avoid any issues of overlooking/loss of privacy consistent with the Council's spacing standards.
- 4.22. Consideration has also been given to the Secured by Design principles to inform the proposed Site layout and boundary treatments. Accordingly, the proposed dwellings have been designed/orientated such that there is the opportunity for natural surveillance from properties. This includes the overlooking of the proposed public open space and equipped area of play located towards the eastern boundary of the Site from plots 32 to 39.
- 4.23. Details of the street lighting to be provided within the Site can be dealt with by way of a pre-occupation condition attached to any grant of planning permission.
- 4.24. The Site Layout has sought to retain as many existing trees and hedgerows as possible, consistent with the development plan and national planning policy. However, in order to accommodate the proposed development, including the proposed Site access, a small number of trees and hedgerows

(including just some partial loss) will need to be removed as documented in Table 1 of the accompanying AIA. Further details are also provided in Section 6 of this Statement. The loss of these trees will be compensated for through replacement planting as shown indicatively on the submitted Landscape Plans.

Materials and House Types

- 4.25. *Figure 3 below provides examples of the proposed house types to be delivered across the Site; further details, including floorplans, are provided as part of the submitted drawing package.*

Figure 3: Proposed House Types



House Type: 2P1B Walk-Up Elevations



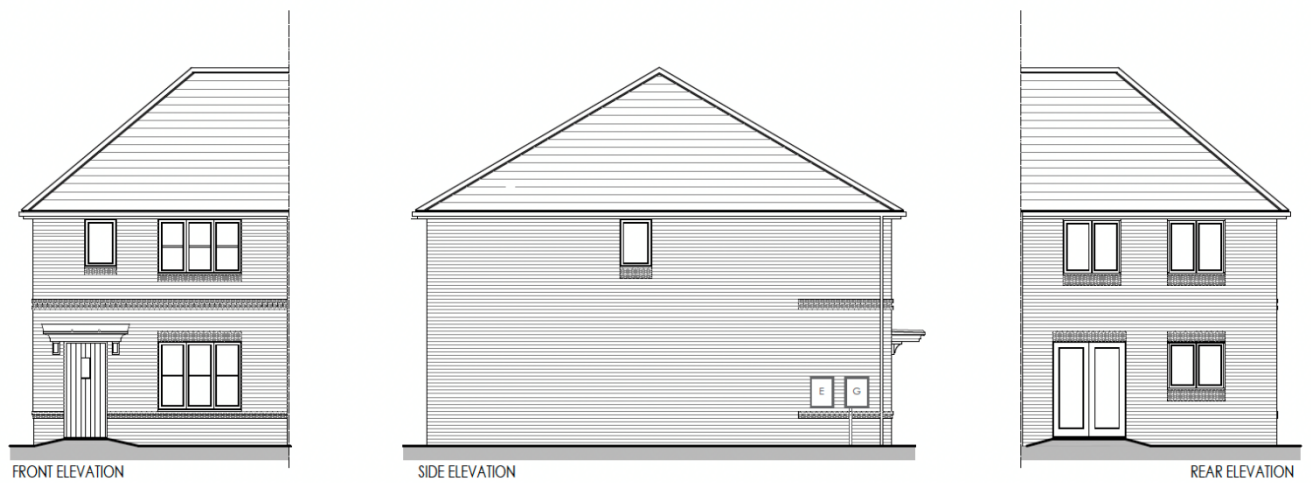
House Type: 2 bed bungalows Elevations



House Type: 4P2B Elevations



House Type: 4P2B/5P3B Semi-Detached Elevations



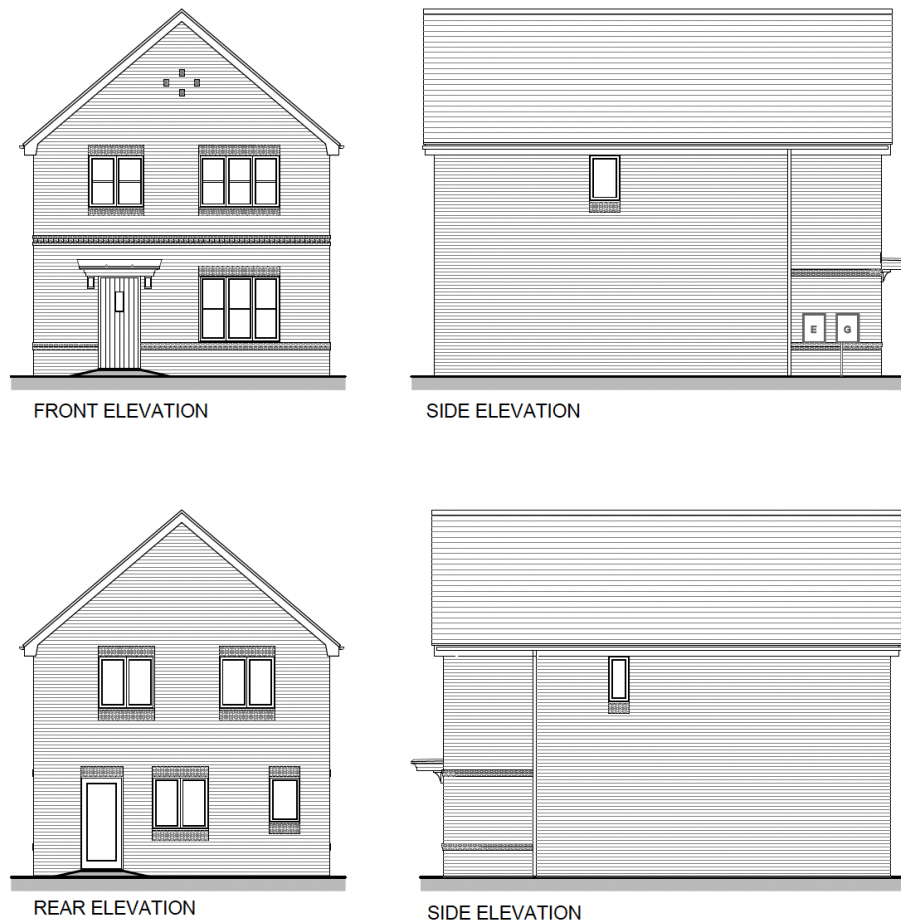
House Type: 5P3B Elevations



House Type: 5P3B Corner Turner Elevations



House Type: 6P4B Semi-Detached Elevations



House Type: 6P4B Detached Elevations

- 4.26. The palette of materials proposed by the Applicant comprise facing brickwork with contrasting details and some render. Roof materials will likely include the use of slate-coloured concrete tiles. The palette of materials has been carefully considered with a view to ensuring a high-quality design which responds to the placemaking aspirations set out in PPW12.
- 4.27. Confirmation of the full and final materials palette can be dealt with by way of a pre-commencement planning condition(s) attached to any planning permission.

Landscaping and Public Open Space

- 4.28. Landscape Plans (Drawing Ref.'s P.1626.22.03 Rev. G) and a Planting Plan (P.1626.22.05 Rev. G) have been prepared and are submitted with the Application; these illustrate the ability and commitment to provide new and compensatory tree and hedgerow planting across the Site. This will include native planting, ornamental planting, wildflower seeding, as well as turfed private gardens as part of the plot landscaping.

- 4.29. The accompanying Landscape Plans also provide details of the hard landscaping that is proposed across the Site within both public and private areas of the development. This includes the main internal road layout, designed to adoptable standards.
- 4.30. As documented earlier in this Statement, public open space will be provided towards the east of the proposed build form, extending to 0.55 hectares. This will include a local equipped area of play and an attenuation basin as part of the surface water drainage strategy.
- 4.31. The proposed boundary treatments include 1.8m high timber close boarded fences between properties, as well as a 1.8m high screen wall/fences between some of the plots (primarily on the corner plots) as delineated on the submitted Site Layout.

Accessibility

- 4.32. Vehicular (and pedestrian/cycle) access into the Site will be created from Mold Road. This will serve as the only point of access into the Site. The visibility splays at the proposed Site access will be 4.5 x 158m looking right (to the exit arm of the roundabout) as shown on Drawing Ref. SCP/220743/SK01 Rev. D provided at Appendix C of the accompanying Transport Statement. The access arrangements have been designed to allow left and right turns out from the Site, with left turn into the Site only from Mold Road. A separate right turn lane will be provided along the central reserve in order to allow vehicles to turn right from the proposed Site access onto Mold Road (northbound).
- 4.33. The proposed access will include a 5.5m carriageway with a 3m combined cycle/footway on the northern and southern sides of the access road, designed to adoptable standards. These will link to the existing cycle/footway network on Mold Road. The internal footways provided at the entrance to the Site will provide for the safe movement of pedestrians and to encourage non-car travel in view of the Site's locational sustainability and access to public transport services as documented in Section 2 of this Statement. This includes connecting to the existing footway network on Mold Road, providing a safe and traffic free link to local Schools and services, including public transport.
- 4.34. The road widths, including the features junction and private driveways, have been designed such that the proposed development is accessible via refuse vehicles and emergency vehicles. Swept path analysis has been undertaken to inform the proposed Site layout, details of which can be found in Section 3.5 and Drawing Ref. SCP/220743/ATR02 Rev C found at Appendix D of the accompanying Transport Statement.
- 4.35. The use of dropped kerbs and tactile paving will assist footpath users and cyclists of all abilities, ensuring that the proposed development is accessible to all. The proposed development and house

types have taken account of the Council's guidance, and will ensure access for people of all abilities, as well as the safe movements of pedestrians and cyclists.

- 4.36. The proposed development will comprise a mix of side and front off-road parking consistent with the Council's standards set out in LPGN16.

Waste and Recycling

- 4.37. Each of the proposed dwellings will have its own private bin storage area to aid waste collection and recycling. Refuse collection will take place kerbside, as shown on the submitted Refuse Collection Plan (Drawing Ref. MRGWR-SP.REF.01 Rev. M).
- 4.38. As outlined above, vehicle tracking has been undertaken as part of the accompanying Transport Statement to ensure that the internal road system can accommodate the safe manoeuvring of refuse vehicles. This has demonstrated that a refuse vehicle can enter and leave the Site in a forward gear, as shown in Appendix D of the accompanying Transport Statement.

Surface Water and Foul Drainage

- 4.39. The proposed development will incorporate the following drainage measures, as documented in the accompanying Flood Consequences Assessment (FCA) and Drainage Strategy, and shown on Drawing Ref. 7956 / SK01 Rev. J:
- **Surface Water** – the Site does not benefit from any existing drainage and will rely on infiltration and surface water run-off to dispose of surface water flows. The flows will follow the topography towards the eastern edge of the Site towards the watercourse located outside of the Site boundary. The surface water drainage strategy has been developed based on infiltration testing as detailed within the FCA and Drainage Strategy. This will provide a flow rate of 15.7l/s and would require an attenuated surface water design before flows are passed forward to the watercourse at a restricted flow rate. The surface water drainage strategy presented as part of this Application (at Appendix 1 of the accompanying Flood Consequences Assessment) is providing all attenuation within a SuDS basin at the end of the network with a hydro brake flow control device to restrict the flows. Incorporation of additional source control SuDS components such as water butts, permeable paving and bio retention will need to be considered further at the detailed design stage; and
 - **Foul Water** – it is proposed to discharge all foul flows into the foul gravity network within St Giles Park to the north of the Site. A gravity connection will not be achievable and therefore a foul pumping station is proposed at the south-eastern edge of the Site allowing flows to

be pumped along a rising main to a suitable discharge point within St Giles Park foul public sewer network.

- 4.40. A SuDS Maintenance and Management Plan should be produced to outline the activity and frequency of inspections and maintenance works required on any SuDS components subject to SAB approval/adoption.

Environmental Sustainability

- 4.41. The proposed development has the potential to generate sustainability benefits. The sustainable location of the Site and the availability of alternative modes of transport, together with the pedestrian and cycle permeability offered within the Site, should encourage non-car travel. Likewise, the new tree and hedgerow landscaping to be delivered as part of the proposed development has the potential to make a positive contribution to the biodiversity value of the Site over time.
- 4.42. As a long-established North Wales housebuilder, the Applicant promotes energy efficiency within their homes; indeed, on average these are six times more efficient and generate over 60% fewer carbon emissions than older properties. As a commitment to energy efficiency, features include efficient heating systems, double glazing, insulated flooring, and a high standard of roof and wall insulation.

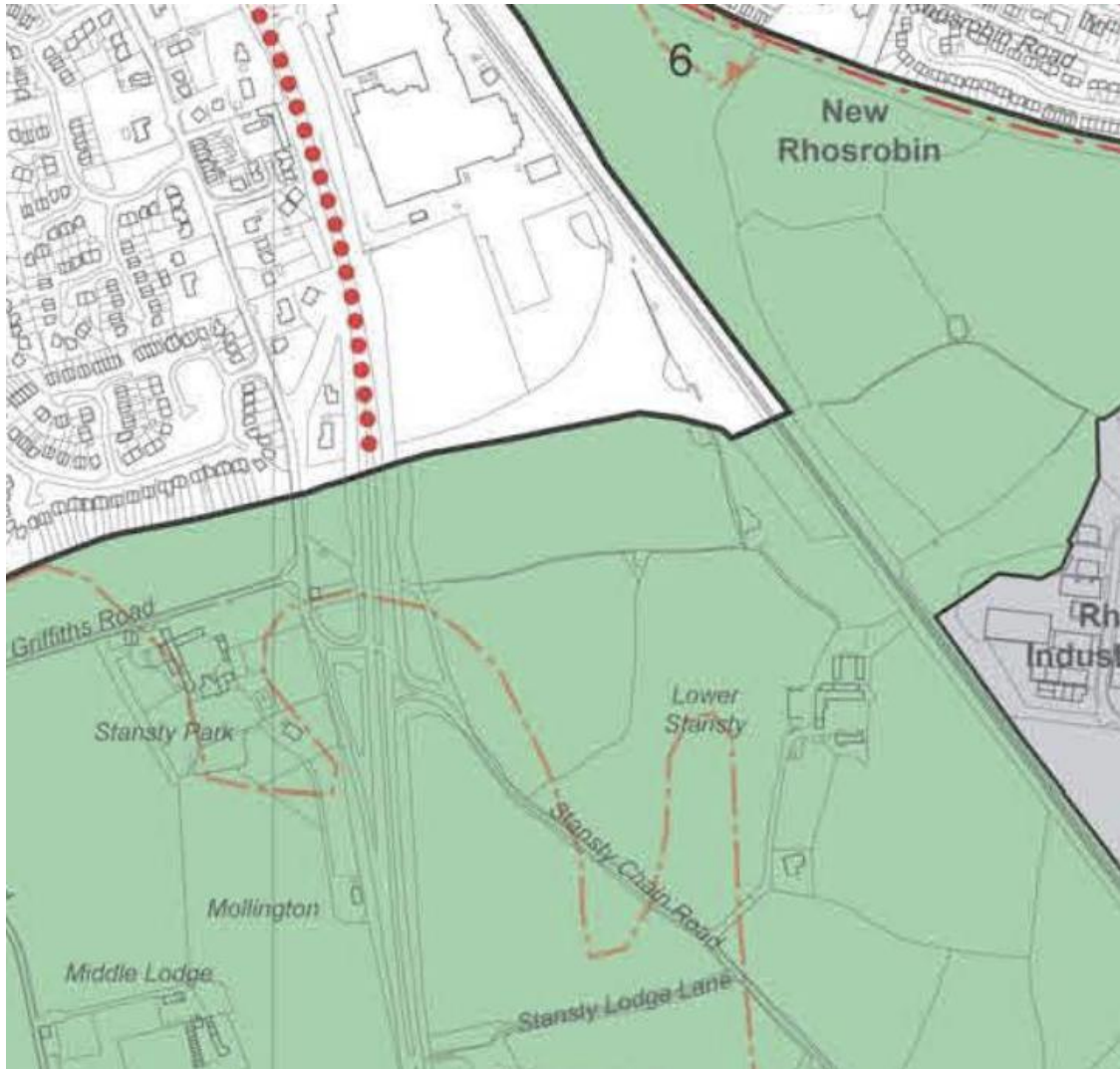
5 PLANNING POLICY CONTEXT

- 5.1. For decision-taking, Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that if regard is to be had to the development plan for the purposes of determination, then that determination must be made in accordance with the development plan unless material considerations indicate otherwise.
- 5.2. This requirement of planning law is re-iterated in Paragraph 1.21 of Planning Policy Wales 12 (“PPW12”) published in February 2024.
- 5.3. Accordingly, we set out the relevant development plan and any other material considerations relevant to this Application below:

Local Development Plan

- 5.4. The adopted development plan for the purposes of this Application comprises the following:
- Wrexham Unitary Development Plan covering the period 1996 to 2011 (adopted in 2005);
 - Wrexham Unitary Development Plan Proposals Map.
- 5.5. The adopted UDP is now time-expired, and thus the weight to be afforded to the policies will depend on the consistency of the UDP with PPW12.
- 5.6. The Site is located at the south-eastern edge of the settlement of Gwersyllt, which is identified as an *Urban Village* within the UDP.
- 5.7. On the adopted UDP Proposals Map, the Site is identified as lying within the Green Barrier under Policy EC1, outside but adjacent to the settlement boundary of Gwersyllt:

Figure 4: Adopted Unitary Development Plan Proposals Map Extract



Adopted Local Development Plan

- 5.8. In addition to those policies cited above, the following adopted UDP policies are considered to have some relevance in the determination of this Application (subject to their degree of consistency with PPW12 and the weight to be applied to them), and are considered further in Section 6 of this Statement:

Table 2: Relevant Unitary Development Plan Policies

Policy Reference	Policy Title
CLF5	Open space requirements from new residential development
EC2	Agricultural Land
EC6	Biodiversity Conservation
EC4	Hedgerows, Trees and Woodland

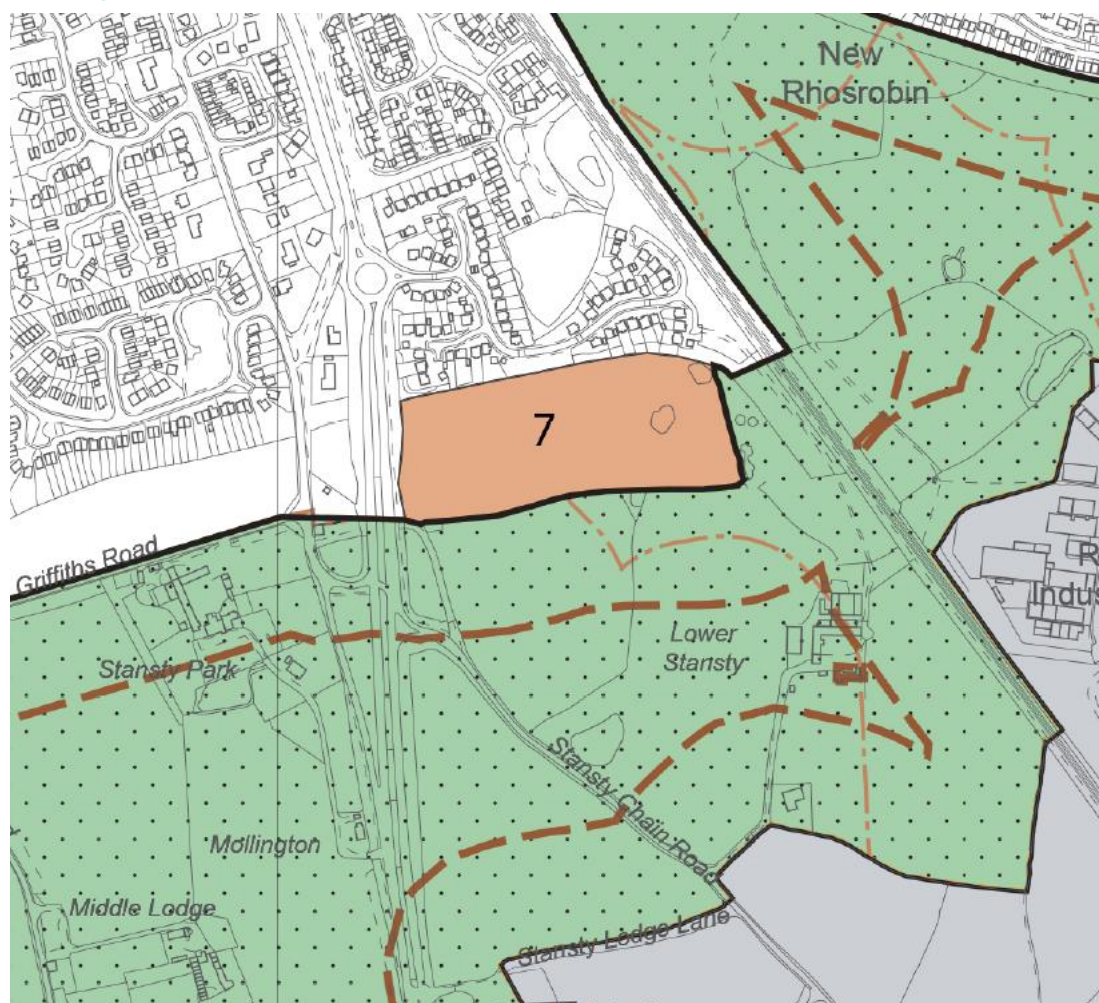
EC12	Development and Flood Risk
EC13	Surface Water Run-Off
GDP1	General Development Principles
GDP2	Capacity of infrastructure and community facilities
H5	Housing in the Countryside
H7	Affordable housing within new developments
H8	Affordable Housing
PS1	The Broad Location of Development (and PS2-PS12)
T8	Parking
T9	Walking, Cycling and Horse Riding Routes

- 5.9. Guidance from Welsh Government published in a letter dated 24th September 2020 confirms that in the absence of an up-to-date LDP, plans adopted prior to 4th January 2016 will remain the LDP for determining planning applications until replaced by a new LDP.
- 5.10. This is the case in Wrexham. Accordingly, the adopted UDP remains the development plan for the purposes of determining this Application.
- 5.11. This follows the formal withdrawal of the Replacement Wrexham Local Development Plan 2013-2028 in March 2026, as documented further below.

Replacement Wrexham Local Development Plan

- 5.12. The Replacement Wrexham Local Development Plan 2013 – 2028 was adopted by the Council in December 2023.
- 5.13. Within the Replacement Wrexham Local Development Plan, the Site was allocated for a residential land-use under Policy H1 “*Housing Allocations*,” Site Ref. 7, for 96 no. dwellings.
- 5.14. An extract of the Replacement Wrexham Local Development Plan is provided at Figure 5 below:

Figure 5: Replacement Wrexham Local Development Plan Proposals Map Extract



- 5.15. Gwersyllt was identified as a *Key Settlement* in the Council's Replacement Wrexham Local Development Plan.
- 5.16. Following a successful legal challenge, the Replacement Wrexham Local Development Plan was formally withdrawn by the Council in March 2026. It no longer forms part of the development plan for Wrexham.

Planning Policy Wales 12

- 5.17. PPW12 is a material consideration in planning decisions. PPW12 sets out the Welsh Government's approach to sustainable development and core planning principles. This identifies sustainable development as the process by which to improve the *economic, social, environmental* and *cultural well-being* of Wales, and proposals should seek to promote sustainable development.
- 5.18. Paragraph 1.18 re-iterates the presumption in favour of sustainable development.

- 5.19. Within PPW12, paragraph 1.22 requires development proposals to be determined in accordance with the adopted development plan unless material considerations indicate otherwise.
- 5.20. Placemaking features strongly within PPW12, identified as a holistic approach to the planning and design of development and spaces. This encourages high-quality development, with major developments creating new places.
- 5.21. Chapter 3 of PPW12 identifies the need to encourage and support the use of the Welsh language. Development proposals should consider the likely impact on the Welsh language and is a material planning consideration. It also seeks to protect the best and most versatile agricultural land unless there is an overriding need for its development.
- 5.22. Paragraph 3.60 of PPW12 recognises that *“infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing.”*
- 5.23. Chapters 3 and 4 of PPW12 look at locational sustainability. New development should be accessible by walking and cycling, and well-served by public transport, as alternatives to the private car. New development should be located such that it minimises the need to travel and reduces dependency on the private car.
- 5.24. Chapter 4 of PPW12 includes reference to new housing provision, with the need for a supply of land which is deliverable. Local Planning Authorities are required to ensure that the Council's Housing Trajectory forms part of the LDP, and it must set out the expected rate of housing delivery for both market and affordable housing for the LDP period. The Housing Trajectory must be used as the basis for monitoring the delivery of housing in each Authority area. Accurate information on housing delivery assessed against the Trajectory is necessary to form part of the evidence base for development plan Annual Monitoring Reports and for subsequent plan review. Under-delivery against the Housing Trajectory may require a specific early review of an LDP. Monitoring must be undertaken in accordance with the guidance set out in the Development Plans Manual.
- 5.25. Paragraph 4.2.26 confirms that a community's need for affordable housing is a *material planning consideration* in the determination of planning applications.
- 5.26. Paragraph 4.2.27 confirms that affordable housing includes social rented housing owned by local authorities and Registered Social Landlords and intermediate housing where prices or rents are above those of social rent but below market housing prices or rents.
- 5.27. Paragraph 4.2.28 sets out the importance for local planning authorities to have an appreciation of the demand for different types of affordable housing in relation to supply.

- 5.28. Paragraph 4.2.30 sets out the requirement for all affordable housing to meet the Welsh Government's development quality standards.
- 5.29. Paragraph 4.2.34 states that planning applications for housing on sites that comply with an up-to-date development plan should be assumed to be viable.
- 5.30. Paragraph 4.2.35 states that the provision of affordable housing exception sites must be considered to help meet identified requirements and ensure the viability of the local community. Where such policies are considered appropriate it should be made clear that the release of housing sites within or adjoining existing settlements for the provision of affordable housing to meet local needs which would not otherwise be allocated in the development plan, is an exception to the policies for general housing provision. Such policies must be fully justified, setting out the type of need and the kind of development which fall within their terms.
- 5.31. The paragraph further requires that affordable housing provided on exception sites should meet the needs of local people in perpetuity.
- 5.32. Chapter 6 requires development proposals to take account of the wildlife or landscape value of an area (including safeguarding protected species), and states that it is important to balance conservation objectives with the wider economic needs of local businesses and communities. Landscape value is identified as an intrinsic part of PPW12, and consideration should be given at the outset to any landscape value such that the wellbeing needs can be achieved. The provision of green infrastructure is encouraged, and the quality of the built environment should be enhanced by integrating green infrastructure into new development demonstrated through a Green Infrastructure Statement as required by paragraph 6.2.12. Paragraph 6.2.13 recognises that green infrastructure can have wider cumulative benefits, particularly in relation to biodiversity and the resilience of ecosystems as well as in securing the other desired environmental qualities of places.
- 5.33. Chapter 6 also covers matters relating to flood-risk and drainage. PPW12 is clear that new development should reduce and not increase the risk of flooding; to this end, Local Planning Authorities are encouraged to work closely with Natural Resources Wales, drainage bodies, sewerage undertakers and relevant authorities in the determination of planning applications. This process should ensure that surface water run-off is controlled as near to the source as possible through the use of sustainable urban drainage systems ("SUDS"), ensuring that development does not increase flooding elsewhere by the loss of flood storage/flood flow route, or increase the problem of surface water run-off. Paragraph 6.6.17 requires that development of one or more dwellings also require approval from the SuDS Approval Body ("SAB") before construction can commence. This is designed to ensure that SuDS infrastructure is properly maintained and functions effectively for its design life.

5.34.

Future Wales – The National Plan 2040

- 5.35. The Welsh Government published the National Plan in February 2021. It serves as the national development framework for Wales, a spatial plan setting the direction for development nationally up to 2040. It provides the basis upon which further guidance, including Planning Policy Wales and Local Development Plans, should be prepared.
- 5.36. The Foreword to the National Plan sets out the Minister for Housing and Local Government's determination to deliver social and affordable housing. The Plan recognises that affordable housing is currently a critically important issue across all parts of Wales.
- 5.37. Wrexham is identified as a *National Growth Area* in the National Plan – this will seek to attract and deliver new economic investment, and which in turn will require supporting infrastructure including new housing.
- 5.38. In respect of housing delivery, the National Plan requires a mix of housing types and tenures to create social inclusion and to cater for mixed lifestyles and working arrangements.
- 5.39. Policy 7 focuses on the delivery of affordable homes. Providing housing at levels which meets needs is stated to be a key priority for the Welsh Government. The planning system must facilitate the provision of additional market and affordable housing.
- 5.40. In the North, Local Development Plans should seek to support growth and appropriate development in rural towns and villages. This includes market and affordable housing.

Technical Advice Notes (TAN)

- 5.41. Alongside PPW11, a number of Technical Advice Notes ("TAN") have been prepared by the Welsh Government. Those of relevance to the determination of this Application comprise the following:
- TAN2 – Planning and Affordable Housing
 - TAN5 – Nature Conservation and Planning
 - TAN11 - Noise
 - TAN12 – Design
 - TAN15 – Development and Flood Risk
 - TAN16 – Recreation and Open Space
 - TAN18 – Transport
 - TAN20 – Planning and the Welsh Language
 - TAN24 – The Historic Environment

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

- 5.42. This Technical Advice Note (TAN2) is a material planning consideration that should be read alongside PPW12 as documented above, in the determination of planning applications.
- 5.43. The purpose of TAN2 is to provide advice to local planning authorities on how to determine affordability. This includes the need for a collaborative approach working alongside stakeholders.
- 5.44. Paragraph 3.2 of TAN2 sets out the need for local planning authorities to include an affordable housing target in their development plan which is based on the housing need identified in the local housing market assessment. It should set out how this target will be achieved and monitor development on an annual basis.
- 5.45. Paragraph 5.1 of TAN2 defines affordable housing as including social rented housing and intermediate housing.
- 5.46. TAN2 recognises that affordability is one of the key factors influencing housing demand and need. Information on affordability will therefore be an important consideration in developing policies to deliver/meet affordable housing needs.

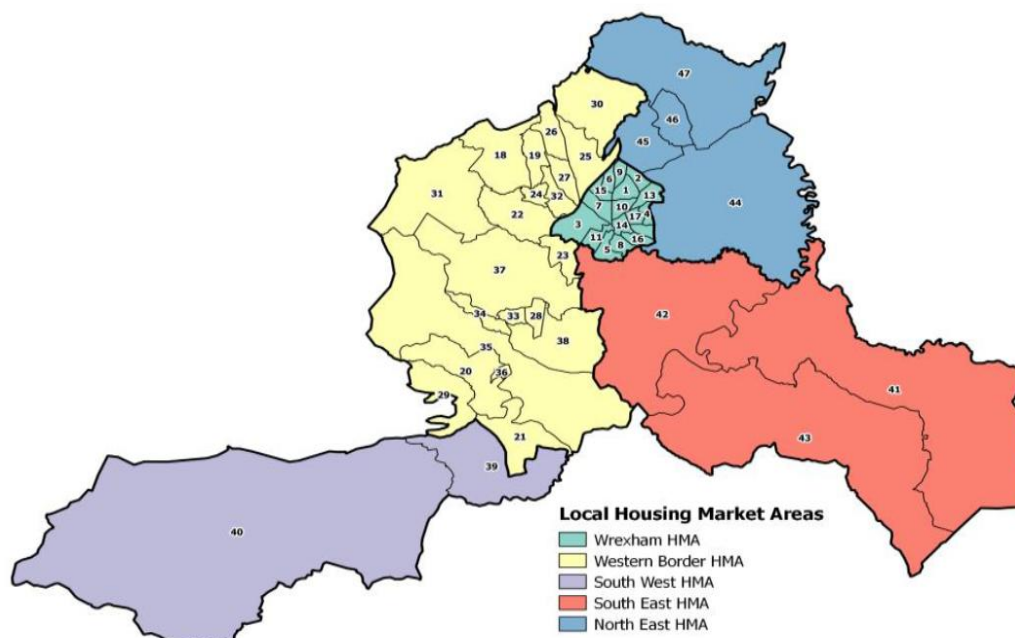
Other Material Planning Considerations / Evidence Base Documents

- 5.47. Wrexham County Borough Council has published a number of other material planning considerations and evidential based documents which are considered to be pertinent in the consideration of this Application; further details are set out below.

Local Housing Market Assessment Update 2017 (LHMA)

- 5.48. The Council's 2017 Local Housing Market Assessment (LHMA) Update was published in April 2018 and covered the period from 2014 onwards.
- 5.49. It also provides details of the five Local Housing Market Areas within Wrexham, shown below:

Figure 6: LHMA 2017 Local Housing Market Areas in Wrexham



- 5.50. The LHMA identified a household need for 157 new affordable homes a year across Wrexham County Borough.
- 5.51. Gwersyllt is identified as lying within the Western Border HMA. Tables 6.5 and 6.6 of the LHMA identified an affordable need for the following:

Table 6.5 Overall affordable housing need by sub-area									
Sub-area	Number of bedrooms and Table %						Total	Total (% need by area)	Base (no. households by sub-area)
	1	2	3	4	5	6			
South West	0.4	0.3	0.1	0.0	0.0	0.0	0.8	14	0.8
North East	3.3	1.3	0.5	0.1	0.0	0.0	5.2	87	5.2
South East	1.3	1.0	0.6	0.2	0.0	0.0	3.0	50	3.0
Western Border	26.1	14.0	7.9	1.3	0.1	0.0	49.3	826	49.3
Wrexham	21.8	12.1	6.3	1.4	0.1	0.0	41.7	698	41.7
Base (need by beds needed)	886	478	259	50	2	0	1,675	1,675	100.0
% need by bedrooms	52.9	28.5	15.5	3.0	0.1	0.0	100.0		

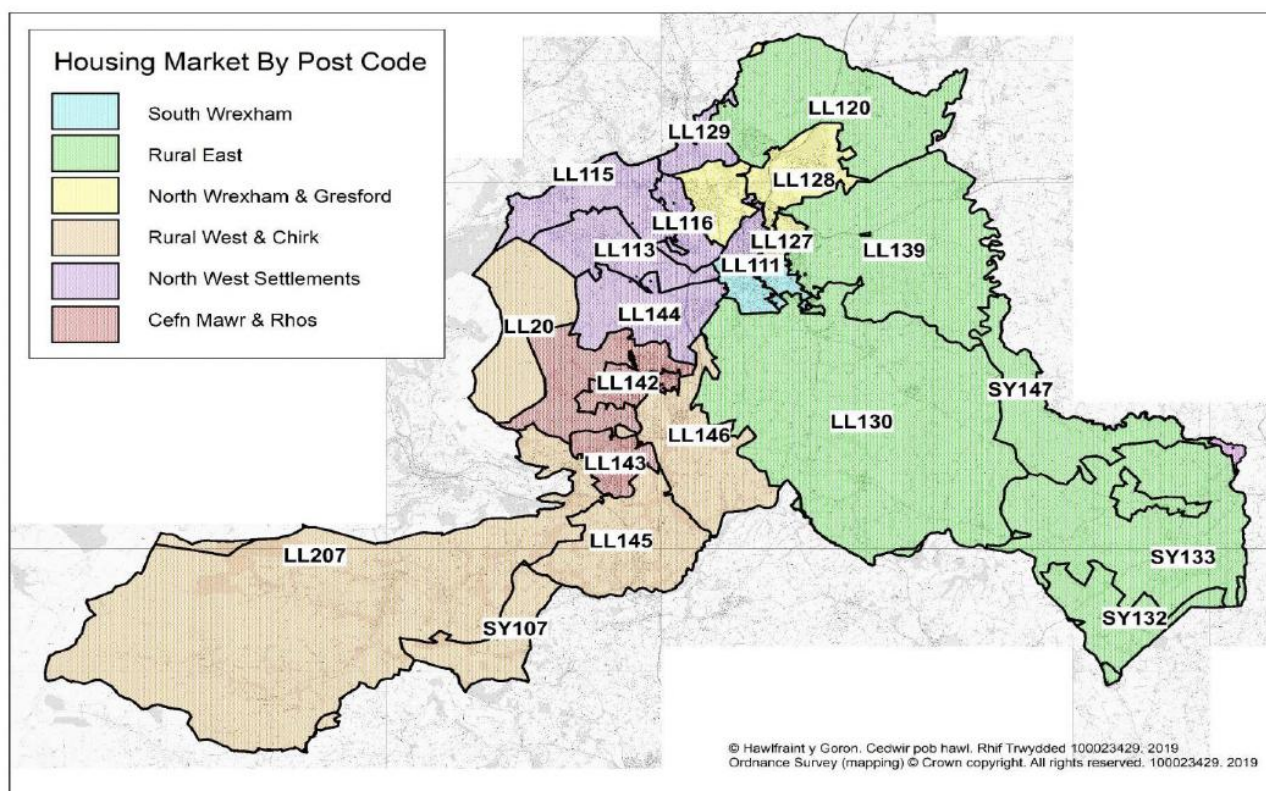
Table 6.6 Affordable housing need by sub-area and dwelling size									
Sub-area	Affordable need		Summary of Dwelling size						Total
	1 yr	5 years	1	2	3	4	5	6	
South West	1	7	50.0	35.7	14.3	0.0	0.0	0.0	100.0
North East	8	41	63.2	24.1	10.3	2.3	0.0	0.0	100.0
South East	5	23	42.0	32.0	20.0	6.0	0.0	0.0	100.0
Western Border	77	387	53.0	28.3	16.0	2.5	0.1	0.0	100.0
Wrexham	65	327	52.3	28.9	15.2	3.4	0.1	0.0	100.0
Total	157	785	72.3	14.2	9.2	2.8	0.0	1.4	100.0
Base	157	785							

- 5.52. Within the Western Border HMA, it is clear that there is a need for 1, 2 and 3 bedroom affordable homes.

Local Housing Market Assessment 2024 (LHMA)

- 5.53. The Council's Local Housing Market Assessment (LHMA) 2022-2037 was published in September 2024 and presented to the Council's Executive Board for approval on 12th November 2024. It was resolved that the LHMA be adopted by the Council.
- 5.54. The LHMA 2022 - 2037 identified six Housing Market Areas, based on postcode areas. These are shown below:

Figure 7: LHMA 2024 Local Housing Market Areas in Wrexham



- 5.55. Gwersyllt is identified as lying within the North Wrexham and Gresford Housing Market Area.
- 5.56. Table 69 of the LHMA sets out the estimated household need for affordable housing for **the first five years** of the LHMA period (2022-2027), as per below:

Table 69

Estimated Net Additional Annual Affordable Housing Need by HMA, Property Type & Tenure (Principal Projection)*								
HMA	1-bed social rent	2-bed social rent	3-bed social rent	4+ bed social rent	All Net Social Rent	Intermediate Rent	Low Cost Homeownership	Overall Net Affordable Housing Need
Cefn Mawr & Rhos	14			1	15	5	3	23
Nth. Western Settlements	21			4	25	10	8	43
Gresford & Nth. Wrexham	34			6	40	22	11	74
Rural East	8			2	10	33	6	49
Rural West & Chirk	6			0	6	2	1	10
South Wrexham	48			5	53	8	6	67
Wrexham County Borough	132			19	150	81	36	267

*Please note, as figures have been rounded up, they may not add precisely.

5.57. Table 71 of the LHMA sets out the estimated household need for affordable housing for the **remaining ten years** of the LHMA period (2027-2037), as per below:

Table 71

Annual Additional Housing Need - Remaining 10 years of LHMA period (Principal Projection) *							
HMA	Social Rented	Intermediate Rent/Low Cost Homeownership	All Affordable	Owner Occupation	Private Rented	Total Market Housing	Total Housing Need
Cefn Mawr & Rhos	0	1	1	2	2	4	4
North Western Settlements	0	1	1	2	3	5	6
Gresford & North Wrexham	0	1	1	2	2	4	5
Rural East	0	1	1	2	3	5	6
Rural West & Chirk	0	0	0	1	1	2	3
South Wrexham	0	1	1	2	2	4	4
Total Housing Need	0	5	5	11	13	24	29

* Please note figures may not add accurately due to the rounding up of numbers.

5.58. Within the North Wrexham and Gresford HMA, it is clear that there remains a **significant need** for affordable housing to come forward between 2022 and 2027 on an annual basis.

5.59. Table 87 of the LHMA sets out the overall additional affordable housing needs across each Housing Market Area for the 15-year LHMA Period, as per below:

Table 87

Additional Affordable Housing Need for 15 year period (10 year migration variant)*							
Annual Housing Need					15 year estimates		
HMA	Socially Rented	Intermediate Rent/ Low Cost Homeownership	Total Annual Affordable Need		Socially Rented	Intermediate Rent/ Low Cost Homeownership	Total 15 year Affordable Housing Need
Cefn Mawr & Rhos	5	7	12		76	104	180
Western Settlements	8	11	19		127	165	292
Gresford & North Wrexham	13	16	29		200	239	439
Rural East	3	20	23		50	301	351
Rural West & Chirk	2	4	6		32	54	89
South Wrexham	18	8	25		266	116	382
Overall Annual Need	50	65	115	Overall 15 Year Need	751	980	1,731

*Please note figures may not add up due to the rounding up of numbers.

5.60. The total 15-year affordable housing needs in the North Wrexham and Gresford HMA stands at 439 dwellings based on the 10-year migration variant.

5.61. Based on the projections, an additional 115 no. additional households are estimated to need affordable housing every year across the County Borough. In terms of tenure, this can be broken down into 50 no. households needing social rent and 65 no. households needing low-cost home ownership or intermediate rent.

5.62. The affordable housing needs in the North Wrexham and Gresford HMA for the period 2022 to 2027 have thus far failed to be met in the period 2022 to 2026 owing to the delays associated with housing delivery and the withdrawal of the Replacement Wrexham Local Development Plan.

5.63. **As such, there is a significant, unmet affordable housing need in the North Wrexham and Gresford HMA (and Wrexham County as a whole) which needs to be met.**

Affordable Housing Prospectus

- 5.64. The Council published its Affordable Housing Prospectus in April 2022. This provides details on the General Housing Needs across Wrexham broken down into Housing Market Areas (based on the LHMA).
- 5.65. This has demonstrated a high annual demand in the Western Border Housing Market Area (205 dwellings per annum) in which the Site was located (at the time of its publication). This was the highest demand of all the Housing Market Areas. The Prospectus identified a higher demand for 1, 2 and 3 bedroom dwellings, alongside a smaller demand for 4-bedroom homes (at the time of its publication).

Local Planning Guidance Notes

- 5.66. Wrexham County Borough Council has published the following Local Planning Guidance Notes ('LPGN') which are considered relevant in the determination of this Application:
- LPGN10 – Public Open Space on New Housing Developments
 - LPGN16 – Parking Standards
 - LPGN17 – Trees and Development
 - LPGN21 – Space around Dwellings
 - LPGN24 – Designing out Crime
 - LPGN27 – Development Contributions to Schools
 - LPGN28 – Affordable Housing
 - LPGN30 – Design
 - LPGN32 – Biodiversity and Development
 - LPGN35 – Great Crested Newt Mitigation Requirements

- 5.67. Compliance of the proposed development with these LPGNs is considered in Section 6 of this Statement.

Other Corporate Strategies published by Wrexham County Borough Council

- 5.68. Wrexham County Borough Council has published the following strategy which is considered to be relevant in the consideration of the proposed development and its justification.

North Wales Regional Homelessness Strategy 2018-2022

- 5.69. The primary aim of this Joint Strategy (working alongside the other North Wales Local Authorities) is stated to be addressing the root causes of homelessness. This is consistent with Part 2 of the Housing (Wales) Act 2014 which places a statutory duty on each Local Authority in Wales to carry

out a homelessness review and to formulate a homelessness strategy. A joint Strategy has been prepared by the six North Wales Local Authorities.

- 5.70. The Strategy confirms that in July 2018, there were 7,022 households on waiting lists across North Wales, 509 people in temporary accommodation, and 84 people sleeping rough.
- 5.71. Some of the key issues identified in the Strategy in relation to access to a home includes a shortage of funding, upfront letting agency fees, and a shortage of the right type of accommodation (amongst others).
- 5.72. The Strategy sets out the need for improved access to accommodation by increasing the housing supply that is suitable and accessible including social new build and utilising more PRS stock.

6 TECHNICAL AND POLICY ASSESSMENT

- 6.1. This Section of the Statement assesses the proposed development against the relevant policies of the development plan, and other material considerations, as documented in Section 5.

Principle of Development

- 6.2. As documented in Section 5 of this Statement, the Site is currently shown on the adopted UDP Proposals Map as lying outside but adjacent to the settlement boundary of Gwersyllt, in the Green Barrier. The proposed residential land-use would therefore be contrary to Policy EC1 of the UDP.
- 6.3. This Policy of the UDP lists a number of exceptions whereby development in the Green Barrier might be deemed appropriate. This does not include affordable housing.
- 6.4. More recent guidance on Green Barrier/Green Wedge is provided in PPW12, paragraphs 3.64 to 3.78.
- 6.5. Paragraph 3.75 of the PPW12 states that the construction of new buildings in a Green Belt or Green Wedge is inappropriate development unless it meets one of the listed exceptions. This does not include affordable housing.
- 6.6. Accordingly, in line with paragraph 3.74 of the PPW12, inappropriate development should not be granted planning permission except in **very exceptional circumstances** where other considerations clearly outweigh the harm which such development would do to the Green Belt or Green Wedge. These exceptional cases would therefore be treated as departures from the Plan.

Applicant's Case for Very Exceptional Circumstances

- 6.7. In accordance with Paragraph 3.74 of PPW12, we set out the Applicant's case for very exceptional circumstances below:

Time Expired Status of Development Plan

- 6.8. Following the withdrawal of the Replacement Wrexham Local Development Plan in March 2026, the UDP remains the development plan for the purposes of this Application; the weight to be afforded to the policies contained within the UDP will depend on their consistency with national planning policy set out in PPW12.
- 6.9. As set out in Section 5 of this Statement, the Plan period for the UDP expired back in 2011 and it is now considerably **out-of-date** together with the evidence base which underpinned it. This includes the settlement limits shown on the UDP Proposals Map, and which are controlled by Policy H5.

- 6.10. Accordingly, the weight to be afforded to Policy H5 is severely diminished, and the UDP settlement limits (along with policies within the plan) are out-of-date and in need of urgent review and adjustment.
- 6.11. The same applies to Policy H8 of the UDP. This allows for affordable housing in the countryside, in exceptional circumstances, where there is a proven need. Where this need cannot be met within settlement boundaries, priority will be given to the development of land on the edge of settlements. However, Policy H8 of the UDP places a restriction on such schemes comprising no more than 5 no. dwellings where they would not have a detrimental impact on countryside protection and conservation policies.
- 6.12. Whilst Policy H8 is out-of-date (and with it the 'cap' on dwelling numbers as part of affordable housing exception site schemes), it does nevertheless demonstrate a clear policy intent and commitment to help meet affordable housing needs on land outside but adjacent to settlement boundaries where there is a proven need, and where no alternative sites within settlement boundaries are available. This also aligns with the guidance contained in paragraph 4.2.35 of PPW12, which places importance on the need to deliver affordable housing and the role that affordable housing exception sites have to play in helping to meet identified requirements (as per paragraph 4.2.35 of PPW12). To this end, the proven need for affordable housing, together with the lack of alternative sites within the settlement boundary of Gwersyllt, forms part of the wider very exceptional circumstances case for the development of land in the Green Barrier as required by paragraph 3.74 of PPW12.
- 6.13. Having regard to the above, the UDP policies and settlement limits, where they are inconsistent with the withdrawn (and unadopted) LDP, are now outdated. Paragraph 7.8 of Development Plans Manual (Edition 3) advises that where development plans are outdated, Local Planning Authorities should give the plan decreasing weight in favour of other material considerations, such as national planning policy.
- 6.14. The evidence that underpins the withdrawn LDP is, in every respect, more up-to-date than the evidence that underpins the time-expired UDP. Moreover, the withdrawn LDP has been subject to Examination in Public, with the Inspectors concluding that subject to the binding changes set out in their Report (which were incorporated into the final version of the Written Statement and Proposals Maps at the time of its adoption), *"the Wrexham Local Development Plan satisfies the requirements of section 64(5) of the 2004 Act and meets the procedural requirements and tests of soundness."*
- 6.15. Paragraph 9.4.12 of the Development Management Manual 3 (DMM) acknowledges that the evidence underpinning an emerging LDP can be used as a material planning consideration when making planning decisions. To this end, whilst the Replacement Wrexham Local Development Plan

is no longer in place, the evidence that underpinned it remains more up-to-date than that which underpinned the time-expired UDP.

- 6.16. As documented in Section 5 of this Statement, the Site was allocated for a residential use in the Replacement Wrexham Local Development Plan under Policy H1, Site Ref. 7, for 96 no. dwellings. The settlement boundary of Gwersyllt was amended accordingly such that the Site was located within it. In doing so, the Council and the Replacement Wrexham Local Development Plan Inspectors accepted that the Site is a suitable and sustainable location for a residential land-use of 96 no. dwellings.
- 6.17. As it stands, there is a policy vacuum in Wrexham, whereby there is no up-to-date development and spatial strategy to meet the affordable housing needs of the County Borough in the short-term (i.e. at least the next five years). There is a pressing need to deliver new affordable housing in Wrexham, for the reasons set out below, and the proposed development would involve a suitable and sustainable Site on which to contribute towards these outstanding needs.

Affordable Housing Delivery in Wrexham Since 2013/14

- 6.18. Table 3 provides details of the additions to the affordable housing stock in Wrexham for the period from 2013/14 to 2023/24, covering the period of the LHMA 2017 Update and LHMA 2024 (as well as the now withdrawn Replacement Wrexham Local Development Plan period which commenced in 2013):

Table 3: New Dwelling Completions in Wrexham since 2013/14

Reporting Year	Total Housing Completions in Wrexham	Total Affordable Housing Completions S106, RSL, Public	Annual Affordable Additions to Housing Stock in Wrexham
2013/14	215	64	30%
2014/15	235	38	16%
2015/16	199	42	21%
2016/17	328	62	19%
2017/18	222	17	7.5%
2018/19	362	119	33%
2019/20	198	14	7%
2020/21	202	62	31%
2021/22	205	33	16%
2022/23	351	87	25%
2023/24	329	108	33%
2024/25	207	70	33.8%
2025/26	314	97	30.9%

Total	3,367	813	-
Average per Year	259	62.5	23.3%

Source: Appendix 2, Wrexham Council Housing Monitoring Report December 2024

- 6.19. The information set out in Table 3 above shows that the average annual affordable housing delivery rate in Wrexham County Borough over the 13-year period 2013/14 to 2025/26 has been 62.5 no dwellings.

Table 4: Gross Affordable Housing Delivery in Wrexham for period 2013/14 to 2025/26 v LHMA Net Need

Reporting Year	Net Annual Affordable Housing Need in Wrexham based on LHMA	Annual Affordable Additions to Housing Stock in Wrexham	Surplus / Shortfall per Year
Local Housing Market Assessment 2017			
2013/14	157	64	-93
2014/15	157	38	-119
2015/16	157	42	-115
2016/17	157	62	-95
2017/18	157	17	-140
2018/19	157	119	-38
2019/20	157	14	-143
2020/21	157	62	-95
2021/22	157	33	-124
Local Housing Market Assessment 2024			
2022/23	115	87	-28
2023/24	115	108	-7
2024/25	115	70	-45
2025/26	115	97	-18
Total	1,873	813	-1,060
Average per Year	144	62.5	-81.5

- 6.20. Table 4 above shows an annual average shortfall in affordable housing delivery of 81.5 dwellings per year in Wrexham between 2013/14 and 2025/26. There has been a cumulative shortfall of 1,060 affordable homes across Wrexham during that same period, when assessed against the annual net affordable housing needs set out in the LHMA 2017 and LHMA 2024.
- 6.21. **This represents a significant shortfall in affordable housing delivery over a 13-year period.**

Existing Affordable Housing Stock in Gwersyllt

- 6.22. Based on data provided by Wrexham Council on 11th June 2026, there are 640 Council-owned properties in Gwersyllt, comprising 162 no. 1-bedroom homes, 200 no. 2-bedroom homes, 267 no. 3-bedroom homes and 11 no. 4-bedroom homes.
- 6.23. Furthermore, the Council confirmed on 11th June 2026 that there were 10 void properties at that time, with a typical void time of 11.6 weeks.
- 6.24. Based on the Council's interactive mapping system for Gwersyllt, that are 159 households on the Housing Register, with 13 vacancies in the last 6 months. Demand is classified as High.

<https://www.google.com/maps/d/viewer?ll=53.06003920269501%2C3.00925354664195&z=14&mid=1FcJck2PvsccoAfSDTCHsvmGqaOvsZiSf>

- 6.25. This **high demand** and small number of existing Council-owned void properties provides further evidence of a clear need and desire for more affordable housing in the Gwersyllt area.

Wrexham Housing Register

- 6.26. As of January 2025, there are confirmed to be 3,257 households on the Housing Register across Wrexham County Borough.
- 6.27. 159 applicants have specified Gwersyllt as their **First Choice** of preference for an affordable home, as documented in Table 5 below:

Table 5: Housing Register – Applications for Gwersyllt Area as of January 2025

Property Type and Bedroom Numbers	No. of Applicants
1-bedroom	89
2-bedroom	41
3-bedroom	19
4-bedroom	10

Source: Wrexham County Borough Council, 5th June 2026

- 6.28. The Council has confirmed that based on recent turnover, this equates to a ratio of approximately 12 applicants per vacancy, indicating continued demand pressure in the Gwersyllt area.

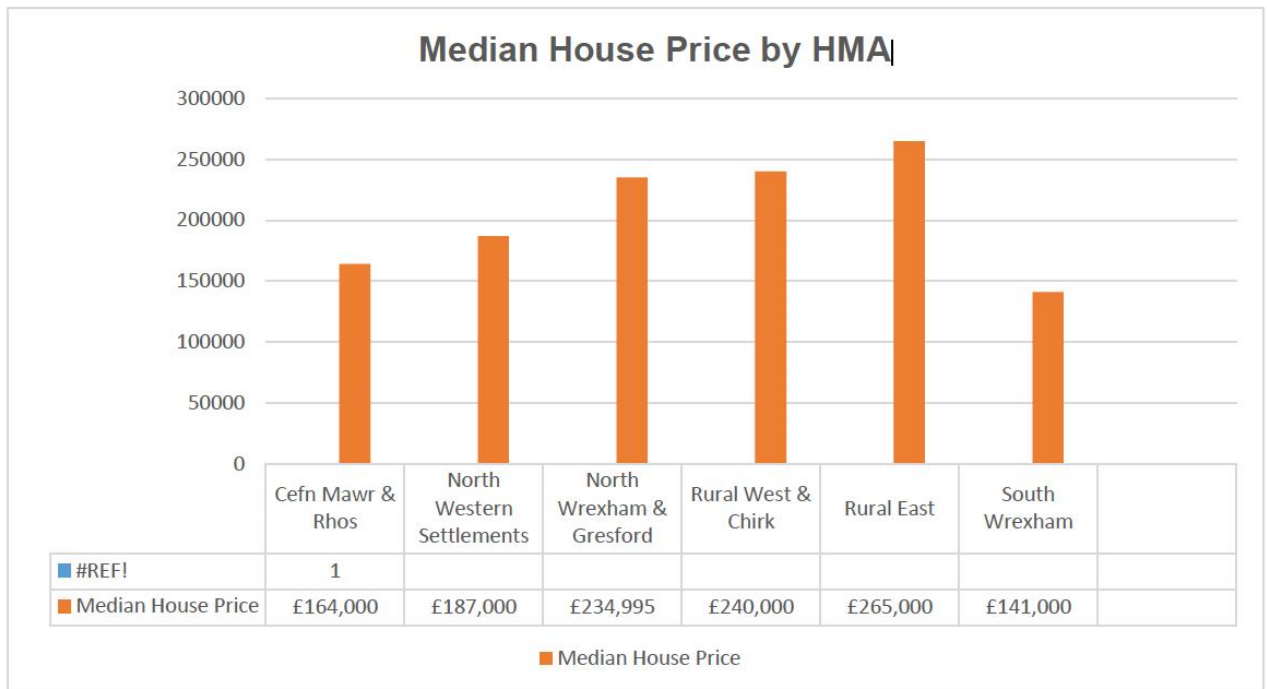
- 6.29. The Housing Register demonstrates a demand that is weighted towards 1 bedroom accommodation, which significantly exceeds supply. It also reflects a consistent structural imbalance across the County Borough where smaller units are in particularly high demand.
- 6.30. Alongside the Housing Register, the Tai Teg Housing Register list details of applications made by Area and Property Type seeking accommodation in intermediate rented housing. The Council confirmed on 11th June 2026 that there are currently 62 no. households registered on the Tai Teg Register who have selected Wrexham as their First Choice Area preference; this figure only covers first choice preference selections, with the overall level of demand across the County Borough likely to be much higher. Gwersyllt has been selected by 8 no. households on the Tai Teg Register albeit the actual level of need and demand for housing in Gwersyllt may be higher, particularly where households are not registered are seeking alternative tenures, or are applying through other routes.
- 6.31. In summary, both the Housing Register and Tai Teg Housing Register demonstrate a strong, current demand for affordable housing stock across the County Borough including within the Gwersyllt area. The demand for property types and bedroom numbers shown on these Registers is reflected in the proposed development.

Waiting Times

- 6.32. The Council has advised that waiting times can vary across the County Borough depending on the property type and location that is being sought.
- 6.33. Given the level of demand for smaller properties, which significantly outstrips supply, waiting times to access a suitable property can be significant.
- 6.34. The Council has advised that it does not publish routine average figures due to the levels of variance across property types and locations.

Affordability

- 6.35. Table 10 of the Council's LHMA 2024 contains details of Median House Prices by HMA in Wrexham. This is extracted below:

Table 10 - Median house prices

- 6.36. The LHMA 2024 confirms that average house prices in the County Borough (£205,332) remain slightly below the Welsh average of £213,816. However, this is **exceeded** in the North Wrexham and Gresford HMA in which the Site is located.
- 6.37. Table 12 of the Council's LHMA 2024 contains details of House Prices to Earnings Ratio. This is extracted below:

Table 12 - Overview of affordability

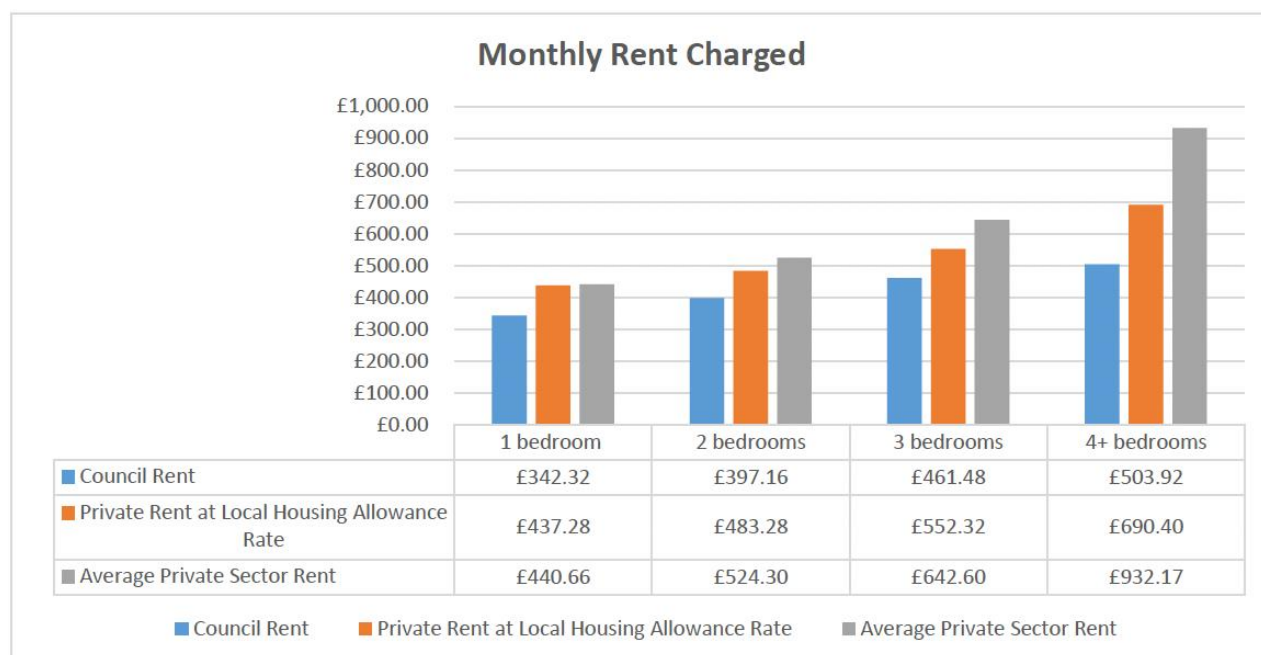
House Price to Earnings Ratio					
Area	Median House Price	Median Earnings	Ratio – House Price to Earnings	Lower Quartile House Prices	Ratio – Lower Quartile House to Earnings
Wales	£190,000	£31,350	6.1	£136,000	4.3
North Wales	£190,000	£31,450	6.0	£143,000	4.5
Wrexham C.B.	£182,250	£33,014	5.5	£140,000	4.2
Cefn Mawr & Rhos HMA	£164,000	£26,753	6.1	£120,000	4.4
North Western Settlements	£187,000	£34,442	5.4	£144,743	4.2
Gresford & North Wrexham	£234,995	£36,956	6.3	£206,929	5.6
Rural East	£265,000	£39,152	6.7	£181,667	4.6
Rural West & Chirk	£240,000	£32,800	7.3	£160,417	4.9
South Wrexham	£141,000	£29,109	4.8	£119,597	4.1

6.38. The above table illustrates that in the North Wrexham and Gresford HMA, there are **significant affordability issues** for people seeking to access a home at both at the Median House Price and Lower Quartile House Price, with mortgage lending typically capped at 4% to 4.5% of gross annual income.

6.39. As documented in the LHMA 2024, first time buyers accessing a 90% mortgage in the North Wrexham and Gresford HMA would need a deposit equivalent to 63% of the median earnings for that area.

Rental Costs

6.40. Table 41 of the Council's LHMA 2024 contains details of Comparative Rental Costs in Wrexham. This is extracted below:

Table 41 - Comparative Rental Costs

- 6.41. This information shows the difference between the Local Housing Authority rental rates and the average private sector rents charged in the County Borough. It also highlights that for those who are on a reduced income, being able to meet this shortfall will prove very difficult, especially if households are in need of larger properties. In the case of 3 and 4 bedroom properties, the difference between the monthly average Council rents and Private Sector Rents is £181.12 and £428.25 respectively.

Median House Prices

- 6.42. Statistical information is available at a more localised level to understand the median house prices, and how these compare to the Ward and County averages. This comprises the HPSSA datasets 2, 9 and 37.
- 6.43. Based on the Middle Layer Super Output Area (MSOA) data for Code Area W02000080 'Wrexham 003' in which the Site is located (i.e Gwersyllt), the following median house price have been identified:
- **March 2013** – median house price of £123,000
 - **March 2023** – median house price of £182,500
- 6.44. This shows an increase of £59,500 to the median house price over a 10-year period at a local level, equating to a **48.3% increase**.

- 6.45. At a Ward level of Gwersyllt South (and East), the median house price was £139,250 in March 2013, increasing to £194,000 in March 2023, an increase of 39.3% over a 10-year period.
- 6.46. In Wrexham as a County, the median house price was £134,250 in March 2013, and £182,000 in March 2023, an increase of 35.5% over a 10-year period.
- 6.47. Accordingly, the median house price increase in the MSOA area has **exceeded** both the Ward and County level increases between March 2013 and March 2023.

Lower Quartile House Prices

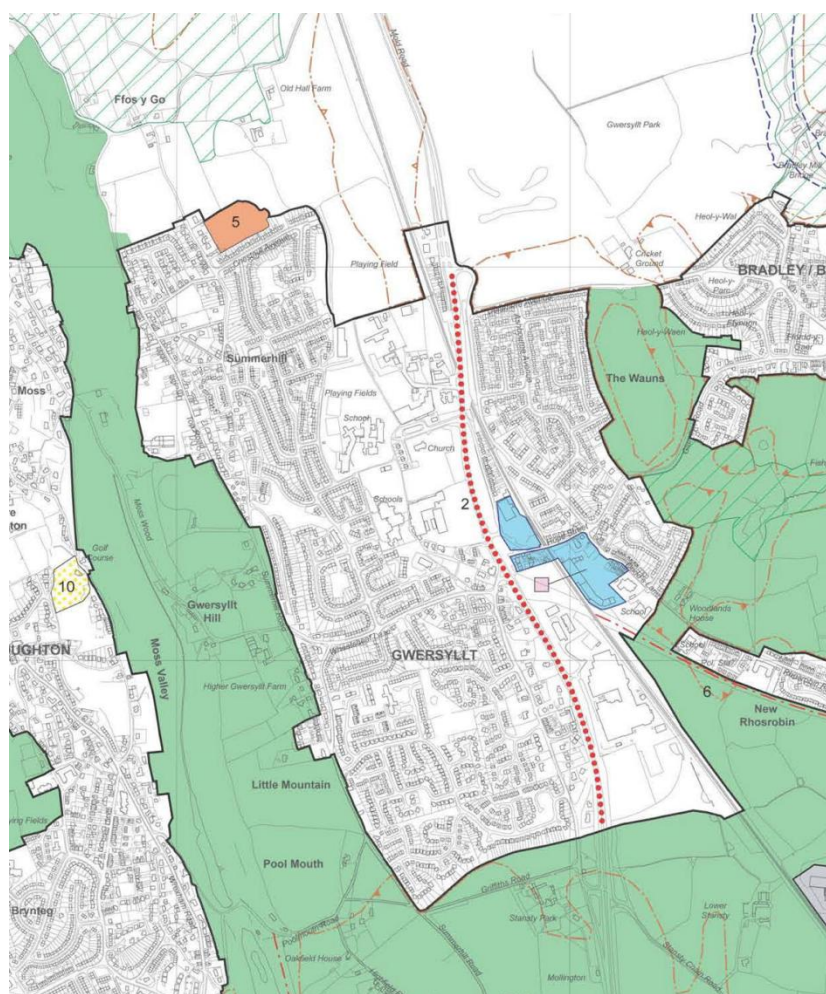
- 6.48. As with the median house prices, statistical information is available at a more localised level to understand the lower quartile house prices, and how these compare to the Ward and County averages. This comprises the HPSSA datasets 4, 15 and 39.
- 6.49. Based on the Middle Layer Super Output Area (MSOA) data for Code Area W02000080 'Wrexham 003,' the following lower quartile house price have been identified:
- **March 2013** – lower quartile house price of £105,000
 - **December 2022** – lower quartile house price of £165,000
- 6.50. This shows an increase of £60,000 to the lower quartile house price over a 9+ year period at a local level, equating to a **57.1% increase**.
- 6.51. At a Ward level of Gwersyllt South (and East), the lower quartile house price was £110,000 in March 2013, increasing to £169,000 in December 2022, an increase of 53.6% over a 9+year period.
- 6.52. In Wrexham as a County, the lower quartile house price was £100,000 in March 2013, and £140,000 in December 2022, an increase of 40% over a 9+year period.
- 6.53. Accordingly, the lower quartile house price increase in the MSOA area has **exceeded** both the Ward and County level increases between March 2013 and December 2022

Alternative Land and Buildings in Gwersyllt

- 6.54. As set out in Section 5 of this Statement, the UDP was adopted in 2005 and covered the period up to 2011. It has been time-expired for 15 years.
- 6.55. The UDP contained one housing allocation in Gwersyllt, namely Site Ref. 5 at Bottom Road for 33 no. dwellings. That parcel of land has been built out.

- 6.56. There are no other housing allocations in the UDP in the neighbouring Urban Villages of Broughton and Tanyfron, nor the nearby settlement area of Bradley, which remain available and undeveloped.
- 6.57. Following the withdrawal of the Replacement Wrexham Local Development Plan in March 2026, there are **no new housing allocations** beyond those identified in the UDP adopted in 2005.
- 6.58. The Council's Candidate Site Register, published to inform the preparation of the Replacement Wrexham Local Development Plan, has been withdrawn.
- 6.59. There are no available sites within the settlement boundary of Gwersyllt, nor in the neighbouring Urban Villages and Bradley, on which the proposed development could otherwise be accommodated.
- 6.60. Furthermore, Gwersyllt is surrounded by Green Barrier to the south, west and east, with a playing field and a designated Special Landscape Area to the north, which restrict its growth. This is shown on the UDP Proposals Map extract below:

Figure 8: Unitary Development Plan Proposals Map Extract of Gwerysllt



6.61. Accordingly, there are **no available, alternative sites** that are sequentially preferable to the Site now subject to this Application on which to locate the scale and type of development that is now proposed.

Role and Function of the Site in the Green Barrier

6.62. The proposed land-use, namely residential, does not constitute one of the exceptions to development in the Green Barrier, as documented in Paragraph 3.75 of PPW12. It is therefore considered appropriate to assess the Site against the five purposes of the Green Barrier as set out in Paragraph 3.67 of PPW12, in order to establish the Site's role and function within the Green Barrier.

6.63. This is undertaken below:

a) Prevent the coalescence of large towns and cities with other settlements

6.64. The Green Barrier within which the Site is situated forms part of a Green Barrier between Gwersyllt to the immediate north Wrexham Town (Stansty/Plas Coch) to the south, as shown below:

Figure 9: Green Barrier between Gwersyllt and Stansty/Plas Coch



- 6.65. The physical separation between the settlement edge of Gwersyllt (i.e. northern boundary of the Site) and the nearest built form south of the A483 extends to c. 722m. This would reduce to c. 652m as a result of the proposed development (i.e. to the nearest proposed dwelling).
- 6.66. The Site itself benefits from well-defined boundaries at all sides, such that it would provide for a contained residential development.
- 6.67. The allocation of the Site for housing in the Replacement Wrexham Local Development Plan, prior to its withdrawal, demonstrates that the Site was considered suitable by the Council and Inspectors for a residential land-use of 96 no. dwellings and that its removal from the Green Barrier would not give cause to concerns over coalescence.
- 6.68. Given that a physical separation of c. 652m would remain, together with the presence of a permanent and defensible boundary further south in the shape of the A483 road infrastructure, it is considered that there is no reason to consider that the proposed development would in any way erode the identity of either Gwersyllt or Wrexham Town (Stansty/Plas Coch).
- 6.69. Whilst the development would reduce the gap between Gwersyllt and Rhosddu Industrial Estate to the south-east, this is physically separated by the presence of the permanent Wrexham - Bidston railway line and existing vegetation (that would be retained), whilst the eastern edge of the proposed development will also comprise public open space and a Great Crested Newt Mitigation Area such that built form will not extend up to the railway line. This will retain visual and physical separation. Furthermore, the Industrial Estate is itself separated from the residential areas of Stansty/Plas Coch and itself physically separated from those areas by the A483.
- 6.70. Accordingly, the proposed development would not conflict with this purpose and would not result in the coalescence of large towns.

b) Manage urban form through controlled expansion of urban areas

- 6.71. The Site represents a logical extension to the settlement of Gwersyllt at its southern edge. The Site is well-contained with existing urban influences on its character to the north and west. The proposed development represents an efficient and considered use of the Site, respecting the transition between the urban area to the north and west and the open agricultural land to the south. The scale of development is considered to be proportionate to the Site and its setting, as evidenced through the proposed net density of 44.2 dwellings per hectare.

c) Assist in safeguarding the countryside from encroachment

- 6.72. As with any large housing scheme, the proposed development will inevitably result in a change to the character and appearance of the Site and the loss of existing countryside. However, and as

shown on Drawing Ref. MRGWR-SP.01 Rev. N, the development area of the Site has been carefully designed such that it will not fully extend up to the eastern boundary and will retain some green infrastructure with it.

- 6.73. The proposed development provides for what would effectively be perceived as a small and logical extension to the settlement in this location, using the natural field boundaries, to support its organic growth and protect the countryside beyond from further encroachment.
- 6.74. The ability to address the significant affordable housing needs in Wrexham, until such time that a Replacement Local Development Plan is in place, will inevitably require the release of land in the countryside.

d) Protect the setting of an urban area

- 6.75. As outlined above, the proposed development will not cause the coalescence of settlements. It will ensure that Gwersyllt, Wrexham Town (Stansty/Plas Coch) and Broughton remain clearly identifiable and separate urban areas. The provision of public open space and a Great Crested Newt Mitigation Area within the eastern part of the Site will ensure that the proposed development successfully integrates with both its built and natural surroundings.

e) Assist in urban regeneration by encouraging the recycling or derelict and other urban land

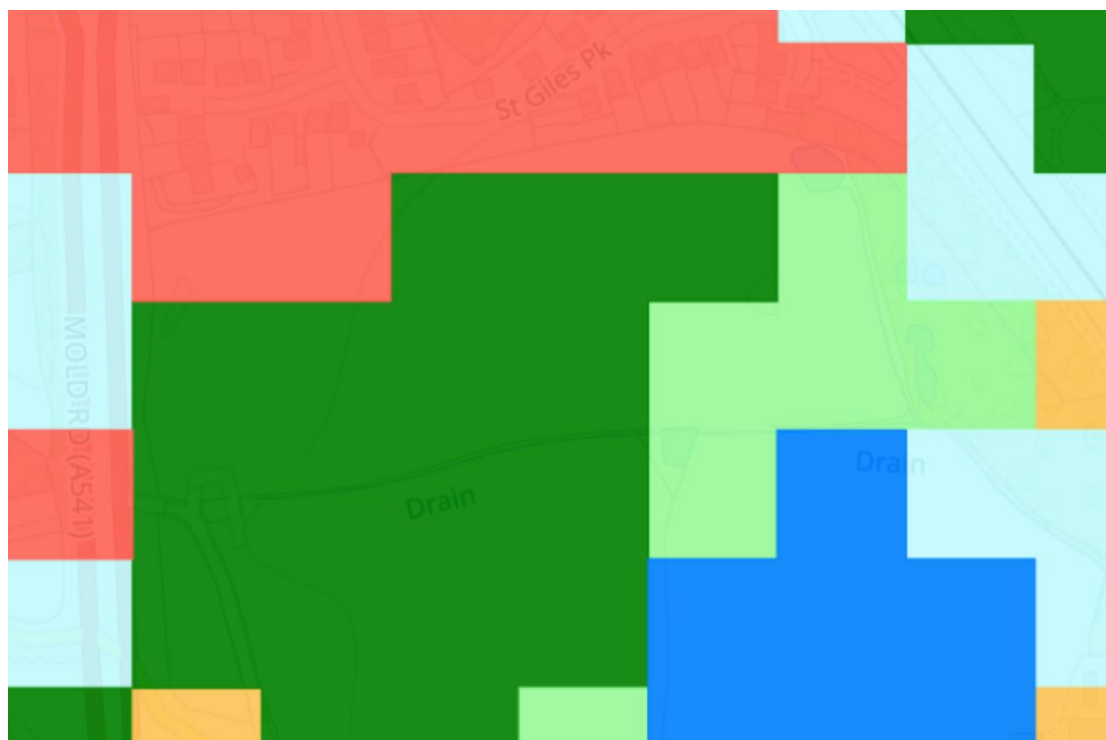
- 6.76. For the reasons set out earlier in this Section, there is no other urban land within the settlement boundary of Gwersyllt nor neighbouring settlement areas in which to locate the scale and nature of development proposed as part of this Application. The withdrawal of the Replacement Wrexham Local Development Plan means that there is no up-to-date development and spatial strategy in place to meet the affordable housing needs of the County Borough, and this will remain the case in the short-term (i.e. at least the next five years).
- 6.77. To this end, the proposed development of the Site would in no way prejudice the Council's development and spatial strategy, nor compromise the delivery of derelict or other urban land.
- 6.78. In summary, it has been demonstrated that the development of the Site would not conflict with the purposes of including land within the Green Barrier such that this would be a determinative factor weighing against the proposed development.
- 6.79. As part of the evidence base to the Replacement Wrexham Local Development Plan, the Council published a Strategic Green Wedge Review (October 2017). Within this, the Site was identified as lying within 'Area 5 – Land south of Gwersyllt' and assigned Site Ref. GWE06CS for the purposes of the Review.

- 6.80. The Council's Review concluded that Site Ref. GWE06CS could *"potentially be developed without significantly undermining the function of the Green Wedge."*
- 6.81. As outlined in Section 5 of this Statement, the Site was subsequently released from the Green Barrier and allocated for 96 no. dwellings in the Replacement Wrexham Local Development Plan prior to its withdrawal.
- 6.82. The conclusions of the Council's Strategic Green Wedge Review therefore reflect the conclusions of our own assessment undertaken above.

Agricultural Land Quality

- 6.83. Based on the Welsh Government's Predictive Agricultural Land Classification Mapping, the Site comprises a mix of Urban Land, and Grade 3a and Grade 3b agricultural land as shown below:

Figure 10: Welsh Government Predictive Agricultural Land Classification Map



- Grade 1
- Grade 2
- Grade 3a
- Grade 3b
- Grade 4
- Grade 5
- Non Agricultural
- Urban

6.84. Policy EC2 of the UDP only allows for the development of Grade 1, 2 and 3a agricultural land where it does not lead to the irreversible loss of that land. However, the weight to be afforded to that policy is considerably diminished given the time-expired nature of the UDP and the absence of any new spatial and development strategy to meet the housing needs of Wrexham in the short-term (i.e. next five years) following the withdrawal of the Replacement Local Development Plan in March 2026.

6.85. To this end, reference should be had to paragraph 3.59 of PPW12 which states:

“When considering the search sequence and in development plan policies and development management decisions, considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if 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 agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.”

6.86. Based on the above, it is clear that PPW12 does not strictly preclude the development of best and most versatile agricultural land. Instead, it is necessary to satisfy the tests set out within paragraph 3.59; we undertake this exercise below:

a) There is an overriding need for the development;

6.87. It has been demonstrated within this Statement that there is a significant affordable housing need in both Wrexham County and at a local level that simply will not be met without the release of greenfield land.

6.88. Given the identified affordable housing needs set out within this Statement, it is considered that the delivery of affordable housing should be viewed as a significant priority for the Council. The loss of a small parcel of Subgrade 3a best and most versatile agricultural land would not have a significant impact on the quantum of such land availability in Gwersyllt nor around Wrexham as a whole based on the Welsh Government's ALC Mapping (and the amount of Grade 1, Grade 2 and Grade 3a land which is identified).

6.89. Whilst the loss of best and most versatile land is a material planning consideration, so too is a community's need for affordable housing consistent with paragraph 4.2.26 of PPW12; in the case of this Application, the delivery of 83 no. affordable homes to meet an identified need and housing

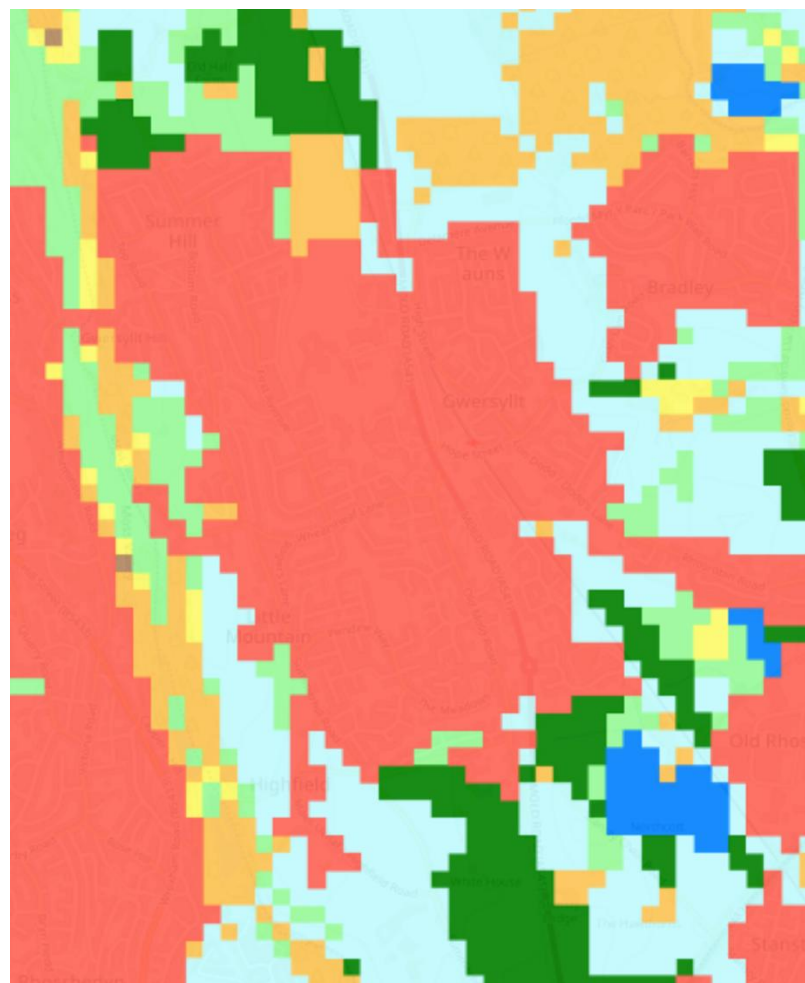
shortfall is considered to significantly outweigh any harm arising from the loss of a single, contained parcel of agricultural land.

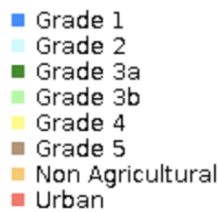
b) And, either previously developed land or land in lower agricultural grades is unavailable or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations.

6.90. There is no previously developed land available in Gwersyllt capable and available of contributing towards the outstanding affordable housing needs at the scale now proposed.

6.91. Furthermore, the ALC Mapping published by Welsh Government clearly demonstrates that there is very limited deliverable land of a lower agricultural grade available at the edge of the settlement boundary of Gwersyllt which is available and capable of being developed, to meet this need. This is shown on the extract below at *Figure 11*:

Figure 11: Predictive Agricultural Land Classification of Gwersyllt settlement





Source: *DataMap Wales*

- 6.92. Whilst it is acknowledged that PPW12 is a material planning consideration when it comes to the loss of best and most versatile agricultural land, the same applies in respect of meeting a community's affordable housing needs as per paragraph 4.2.26 of PPW12. For the purposes of this Application, the policy exceptions set out in paragraph 3.59 of PPW12 are considered to be fully satisfied to justify the proposed development of the Site in question.
- 6.93. The Council clearly needs to balance the importance of meeting affordable housing needs and the historic shortfall in housing delivery against the minor loss of Subgrade 3a best and most versatile agricultural land; however, given the lack of any sequentially preferable sites, it is unclear how the outstanding evidenced County-wide and local affordable housing needs will otherwise be met, particularly given the absence of a new Local Development Plan in the short-term (i.e. within the next five years).
- 6.94. It is the Applicant's position that the proposed development satisfies the requirement of paragraph 3.59 of PPW12.

Deliverability of the Site

- 6.95. An Affordable Housing Delivery Statement is submitted as part of the Application.
- 6.96. This confirms the commitment to deliver 83 no. affordable homes, secured by way of planning obligation within a S106 Agreement.
- 6.97. To provide appropriate reassurance to the Council that a RP will be secured to deliver the affordable homes, it is proposed that a Grampian planning condition be included on any planning approval (Decision Notice) preventing the commencement of development until such time that an Affordable Housing Scheme has been submitted to and approved by the Local Planning Authority. A planning condition requiring submission and approval of an Affordable Housing Scheme prior to commencement can clearly set out tenure, quantum, timing, and delivery triggers.
- 6.98. The Applicant has advised that they would anticipate the Site could be completed within c. 24 months from any grant of planning permission. Accordingly, the proposed development will make

an immediate and significant contribution towards addressing the affordable housing needs in Wrexham.

Caselaw

6.99. There have historically been previous appeal decisions elsewhere in Wrexham for schemes comprising residential development in the Green Barrier. These comprise the following:

- **Application Ref. P/2016/0189 in Wrexham for 189 dwellings issued on 10/06/2019** – this application was refused by Wrexham Council owing to the site's location in the Green Barrier. Following an Application (Ref. 3182282), and the dis-application of paragraph 6.2 in TAN1, the Application was re-opened. In considering the change in Policy, the conducting Inspector recommended that the Appeal be allowed.

In considering the Inspector's recommendation, the Welsh Government agreed that considerable weight should be given to the need to increase housing land supply, notwithstanding that the emerging Local Development Plan was at the Examination stage. Indeed, this was considered to constitute one of the very exceptional circumstances to allow for this residential development in the Green Barrier.

- **Application Ref. P/2018/0560 in Wrexham for 132 dwellings (across two parcels of land) issued on 14/02/2020** – this application was refused by Wrexham Council owing to the site's location in the Green Barrier and a Special Landscape Area. Following an Application (Ref. 3231048), the conducting Inspector recommended that planning permission be allowed on the following grounds:

- The Wrexham Unitary Development Plan is time-expired;
- Residential development in the Green Barrier would conflict with Policies PS1, EC1, EC5;
- Given the time-expired nature of the Unitary Development Plan, it attracts less than full weight in the determination of the Application;
- The absence of an up-to-date development plan renders the Council without a five-year housing land supply;
- The need to increase the supply of housing weighs significantly in favour of the proposal;
- The submitted version of the LDP identifies a need to significantly increase the supply of housing within the area;
- The Council accepts that such housing need can only be satisfied through the development of undeveloped sites;

- The overriding benefits of the proposals, and the fact that the housing requirements cannot be met without the loss of best and most versatile agricultural land, justify the loss of best and most versatile agricultural land; and
- The time-expired UDP, the lack of housing land supply and consistency of the Application proposal with the emerging LDP, coupled with the sustainable location and positive benefits of the scheme, weigh substantially in favour of the development and are considered to comprise very exceptional circumstances to outweigh the harm to the Green Barrier and its wider countryside/landscape status.

The Minister for Housing and Local Government agreed with the Inspector's recommendation and reasoning for approving the Appeal.

6.100. These previous appeal decisions clearly demonstrate that, despite the dis-application of paragraph 6.2 in TAN1, the lack of a sufficient land supply can continue to attract considerable weight from the decision-maker when considering the sustainability credentials of development proposals as a whole against the development plan and other material considerations.

6.101. Accordingly, it is the Applicant's contention that the proposed development, and the very exceptional circumstances to justify it when considered in their totality, are comparable to the cases outlined above such that they outweigh any conflict with time-expired development plan Policies PS1, EC1, EC2 and H5 and should be supported.

Summary Position on Very Exceptional Circumstances

6.102. Having regard to all of the above, the Applicant considers there to be **compelling very exceptional circumstances** that exist to justify and support the proposed development. These can be summarised as follows:

- **Development Plan** – the UDP is time-expired and the evidence base underpinning it is significantly out-of-date. The much more up-to-date evidence base to the Replacement Wrexham Local Development Plan, and the Site's allocation within it for 96 no. dwellings confirmed that the Site is a suitable and sustainable location for housing. Furthermore, Policy H8 of the UDP, whilst out-of-date (and with it the restriction that it places on affordable housing exception sites comprising more than 5 no. dwellings), shows a clear policy intent to help meet proven affordable housing needs on land outside and adjacent to settlement boundaries where no alternative sites within settlement boundaries was available; this remains a priority of national planning policy as a material planning consideration set out in paragraphs 4.2.26 of PPW12, including affordable housing exception sites (as supported by paragraph 4.2.35 of PPW12). Following the withdrawal of the Replacement Wrexham Local Development Plan, there is no up-to-date development and spatial strategy to meet the

significant affordable housing needs in Wrexham County Borough and this requires proactive decision-making given that no such strategy will be in place in the short-term (i.e. within the next five years);

- **Affordable Housing Delivery** – the annual average rate of affordable housing delivery in Wrexham during the 13-year period from 2013/14 to 2025/26 has equated to just 62.5 dwellings. This is a significant shortfall when assessed against the LHMA 2017 annual net need for 157 affordable homes at a County Borough level, and the LHMA 2024 annual net need for 115 affordable homes at a County Borough level. This has led to an increasing, unmet affordable housing need across Wrexham, with a cumulative shortfall of 1,060 affordable homes in the County between 2013/14 and 2025/26 (against the identified LHMA 2017 and LHMA 2024 needs for the same period). The lack of delivery is also down in part to the significant shortfall in overall housing delivery across Wrexham County since 2013/14 against the annual requirements (market and affordable housing);
- **Affordable Housing Need Considerations** – there are a number of affordable housing needs indicators, as follows:
 - The LHMA 2024 has identified a need for 439 affordable homes in the Gresford and North Wrexham HMA between 2022 and 2037, the highest of all the HMA's in Wrexham. Given the absence of an up-to-date development and spatial strategy, there is little prospect of this need being met without positive and pro-active decision-taking in the interim;
 - The Council's interactive mapping demonstrates that in Gwersyllt, there are 159 households on the Housing Register with just 13 vacancies in the last 13 months. There is a **high demand** for affordable housing stock in Gwersyllt;
 - There is a significant need for affordable housing of different types and size in the Gwersyllt area based on the 159 applicants that have identified Gwersyllt as a First Choice area in the County Borough on the Housing Register and the Tai Teg Register. The actual level of need and demand for housing in Gwersyllt may be higher for the reasons set out earlier in this Section;
 - The County Borough Register for affordable housing comprises 3,257 households, a significant number of households in need;
 - Median (+48.3%) and Lower Quartile House (+57.1%) price increases in the MSOA area where the Site is located have **exceeded** the Ward and County averages, all of which have increased significantly over the 10+year period from March 2013 to December 2022/March 2023;

- The House Price to Earnings Ratio table contained within the LHMA 2024 provides clear evidence of **significant affordability issues** in the North Wrexham and Gresford HMA, with the highest levels of unaffordability across the County Borough;
 - The Comparative Rental Costs table contained within the LHMA 2024 illustrates a significant gulf in monthly rental costs between public and private sector properties. Accessing these properties is a **significant financial challenge** for those on a reduced income; and
 - Waiting times to access an affordable home across the County Borough can vary by property type and location, with those households seeking smaller accommodation often waiting for a significant amount of time. The number of Council-owned void properties in Gwersyllt (awaiting new tenants/occupants) stands at just 10 at the time of writing.
- **Alternative Land and Buildings** – there is no other land or buildings within the settlement boundaries of Gwersyllt and immediately adjoining community areas where the proposed development could otherwise be accommodated. This is a key consideration of Policy H8 of the UDP, despite it being out-of-date, and thus remains a matter for consideration as part of the wider justification. All of the historic UDP housing allocations in Gwersyllt and its neighbouring community areas have been built out and there are no new housing allocations in Wrexham at this time in the absence of a Replacement Local Development Plan and this will remain the case in the short-term (i.e within at least the next five years);
- **Role and Function in the Green Barrier** – the proposed development of the Site would not conflict with the five purposes of including land within it. Furthermore, the Site's allocation in the now withdrawn Replacement Wrexham Local Development Plan confirmed that the Site is a suitable and sustainable location for housing, and that its release from the Green Barrier would not compromise the role and function of the Green Barrier in this location;
- **Best and Most Versatile Agricultural Land** – whilst the proposed development would result in the loss of some subgrade 3a best and most versatile agricultural land, this has to be balanced against the wider, evidenced affordable housing needs in Gwersyllt and at a local level. These needs can only be addressed through the release of greenfield land and, as outlined above, it has previously been deemed acceptable for the Site to be developed for housing through its allocation in the Replacement Wrexham Local Development Plan prior to its withdrawal. The loss of the land to development would not compromise the availability of best and most versatile agricultural land at a local or County level;
- **Deliverability** – the proposed development is capable of being completed with 24 months of a grant of planning permission, enabling it to make an immediate contribution towards the

identified affordable housing needs in Gwersyllt and the North Wrexham and Gresford HMA. The proposed dwellings will be managed by a Registered Provider and remain affordable in perpetuity as required by paragraph 4.2.35 of PPW12; and

- **Caselaw** – previous appeal decisions in Wrexham have confirmed that the release of land in the Green Barrier to meet identified housing needs, in the absence of an up-to-date Local Development Plan, can attract considerable weight from the decision-maker when considering the sustainability credentials of development proposals as a whole against the development plan and other material considerations.

6.103. **In view of the above, it is clear that the need to increase the supply of and access to affordable housing in Wrexham has become increasingly crucial, and there is a pressing need to address issues of affordability within Gwersyllt. The proposed development will make a significant contribution towards meeting some of these needs, across a range of house types and sizes, and affordable and intermediate rented tenures.**

6.104. The findings of this Section, together with Section 5, demonstrate evidence of genuine local need for affordable housing,

Housing Mix, Affordable Housing and Density

6.105. As set out in Section 4 of this Statement, the proposed development will comprise the following housing mix:

- 6 no. 1-bed ground floor apartments;
- 6 no. 1-bed first floor apartments;
- 2 no. 2-bed bungalows
- 43 no. 2-bed semi-detached houses;
- 9 no. 3-bed semi-detached houses;
- 8 no. 3-bed corner-turner houses;
- 4 no. 4-bed semi-detached houses; and
- 5 no. 4-bed detached houses

6.106. The proposed development will incorporate 83 no. affordable homes, 75% in excess of the policy requirement set out under Policy H7 of the UDP, Local Planning Guidance Note 28 and Table 11 of the Local Housing Market Assessment 2024),

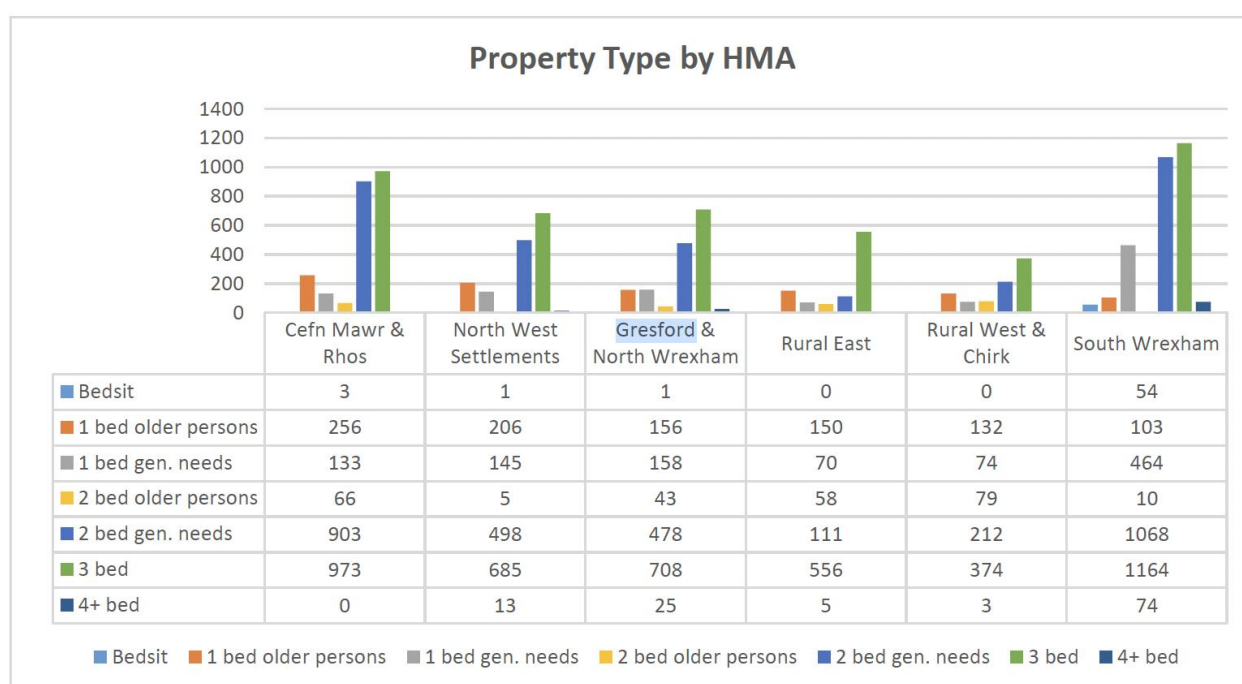
6.107. The proposed affordable properties take the form of 1, 2, 3 and 4 bedroom apartments, bungalows, semi-detached and detached homes responding to the housing needs identified in the LHMA 2017 and 2024, the Affordable Housing Prospectus, and the Housing Register/Tai Teg Register..

6.108. Details of the proposed housing split are set out below:

- 14.5% 1-bed apartments;
- 54% 2-bed bungalows and semi-detached houses;
- 20.5% 3-bed semi-detached houses and corner-turners; and
- 11% 4-bed semi-detached and detached houses, including corner-turner.

6.109. The proposed housing mix does include a larger percentage of 2 bedroom properties when compared to the wider mix. However, this is considered to be reflective of the housing needs set out earlier in this Section, and Section 5, as well as the findings of Table 22 of the LHMA 2024 as extracted below:

Table 22- Distribution of stock by property type



6.110. The above table illustrates that there are a high proportion of 3-bedroom properties in the Gresford and North Wrexham HMA relative to the number of smaller units.

6.111. The proposed affordable housing tenure split will be intermediate rent and social rent, in accordance with Wrexham County Borough Council approved tenure requirements.

- 6.112. The proposed housing mix is considered to appropriately align with the housing needs identified in the Council's LHMA 2017 and 2024 as set out in Section 5 of this Statement and the Council's Housing Register.
- 6.113. The provision of affordable housing is a material planning consideration to be taken into account in the determination of this Application consistent with paragraph 4.2.26 of PPW12.
- 6.114. The proposed net density across the Site will be 44.20 dwellings per hectare taking account of the Site's location, surroundings, configuration and wider policy requirements (including open space, Great Crested New Mitigation Area and landscaping).
- 6.115. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policy H7, LPGN28, Table 11 of the Local Housing Market Assessment 2024, TAN2 and PPW12.

Locational Sustainability

- 6.116. As demonstrated in Section 2 of this Statement, the Site evidently occupies a sustainable location. It benefits from very good access to local services and amenities, and local bus services. It is well-connected via the existing footpath network and which will be improved as a result of the proposed development. The wider economic, social, environmental and cultural well-being benefits of the proposed development are considered in Section 7 of this Statement.

Layout and Design

- 6.117. As documented in Section 4 of this Statement, careful consideration has been afforded to the proposed layout taking account of the Site's surroundings and context, technical and policy requirements including accessibility (road widths, visibility splays, pedestrian linkages), topography, impact on trees/hedgerows/ecology, impact on heritage assets, and privacy/amenity (of nearby existing residential properties).
- 6.118. This has informed the careful preparation of a Site Layout which has sought to limit as much as possible the impact on existing trees and hedgerows within and surrounding the Site. It will provide for a sustainable and logical extension to the settlement.
- 6.119. The creation of two-storey dwellings on the Site is considered appropriate having regard to the Site's surrounding context, the prevailing local character, and its physical characteristics. The layout and siting of the proposed dwellings is in accordance with the Council's spacing standards in LPGN21.

- 6.120. The house types, plot sizes and palette of materials have been designed to provide for the efficient use of land, whilst delivering high-quality accommodation and a high-quality living environment which raises the standard of design in the immediate locality but at the same time is reflective of the local character. The layout also provides for the natural surveillance of properties and public spaces/pedestrian and cycle linkages within the Site from properties with a view to designing out crime and to ensure the well-being of residents. There are no blank wall elevations onto any open public open space (i.e Plots 45 to 52).
- 6.121. The proposed net density across the Site will be 35.89 dwellings per hectare; this is considered to be acceptable taking account of the guidance contained in emerging Replacement LDP Policy SP1, which seeks a minimum density of 30 dwellings per hectare, and the wider policy requirements to be met across the Site.
- 6.122. Each property is designed to allow for access by people of all abilities.
- 6.123. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policy GDP1, LPGN21, LPGN24, and LPGN30, TAN12, and PPW12.

Trees and Hedgerows

- 6.124. An Arboricultural Impact Assessment (AIA) has been undertaken across the Site and is submitted with the Application.
- 6.125. The proposed development has sought to retain existing tree and hedgerow planting, as well as providing compensatory/additional soft landscaping.
- 6.126. In doing so, it has been established that the following trees and hedgerows will need to be removed from the Site to accommodate the proposed development:
- H1 in part; (Category C2)
 - H2 in part (Category C2)
 - H3 in part (Category C2)
 - H4 in part (Category C2)
 - G6 (Category C2)
 - G7 in part (Category C2)
 - G8 (Category C2)
- 6.127. As can be seen above, no Category A or B species are to be removed to facilitate the proposed development.

- 6.128. In addition to the above, the AIA has assessed the potential for the proposed development to impact on other retained trees and hedgerows. This includes a number of additional trees/groups of trees as listed in Table 1 of the AIA, owing to issues relating to the provision of new hard surfaces/services, the construction of new buildings, pruning requirements, and indirect physical impacts.
- 6.129. Tree protection measures are proposed to minimise/mitigate the impact of the proposed development on these species, namely tree protection fencing to be erected prior to the commencement of development. Such measures can be secured through an Arboricultural Method Statement which can be secured by way of planning condition, if it is deemed necessary.
- 6.130. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies EC4 and GDP1, LPGN17, TAN5, and PPW12.

Landscaping and Public Open Space

- 6.131. As documented in Section 4 of this Statement, Landscape Plans have been prepared and are submitted with the Application; these set out the Applicant's intentions to provide new and compensatory tree and hedgerow planting across the Site. They also provide details of the proposed boundary treatments within (between plots) and at the perimeter of the Site, and all hard landscaping.
- 6.132. As set out above, existing trees and hedgerows are only proposed to be removed where they are required in order to secure vehicular and pedestrian connections, and to facilitate the proposed development as whole (including new hard surfaces and built form).
- 6.133. The Application is supported by a Landscape and Ecological Management Plan covering a period of 30 years. This contains a series of landscape design and management objectives and detailed proposals to annually maintain the soft landscaping and ecological areas across the Site during that period and represents a firm commitment on the part of the Applicant to ensure that a high-quality green infrastructure network is provided and maintained across the Site. This sits alongside the submitted Green Infrastructure Statement, which provides details of how the proposed development has sought to avoid, minimise, mitigate, compensate and enhance any impacts of the proposed development on biodiversity and green infrastructure.
- 6.134. As detailed in Section 4 of this Statement, 0.36 hectares of public open space will be provided towards the eastern edge of the Site. This will include an attenuation basin as part of the surface water drainage strategy. An existing landscape and buffer zone will also be provided extending to 0.06 hectares.

- 6.135. Details relating to the maintenance of the public open spaces can be secured by way of a planning obligation.
- 6.136. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies CLF5 and GDP1, LPGN10, TAN16, and PPW12.

Highways and Road Safety

- 6.137. As documented in Section 4 of this Statement, vehicular (and pedestrian/cycle) access to the Site will be provided for through the creation of a new access from Mold Road at the western boundary of the Site, designed to adoptable standards.
- 6.138. The proposed arrangements, including road and footpath widths, as described in Section 4 of this Statement are considered to be acceptable and will facilitate safe movements by vehicles (include refuge), pedestrians and cyclists of all abilities into and out of the Site, and through it, as well as providing safe connectivity to the immediate surroundings. The proposed development should encourage and facilitate Active Travel as a result.
- 6.139. Cycle parking will be provided as part of the proposed development, with a minimum provision of two secure cycle parking spaces per dwelling, to facilitate and encourage sustainable travel.
- 6.140. In respect of car parking provision within the Site, the standards are those set out in LPGN16. The total parking requirement is 186 no. spaces based on the Council's standards. A total of 179 no. spaces, inclusive of 8 no. visitor spaces, are proposed. This leaves a shortfall of 7 no. spaces, relating only to 1-bedroom and 3-bedroom dwellings. Justification for the proposed level of car parking is provided in Section 3.20 of the accompanying Transport Statement, which we don't intend to repeat. However, this provides a robust case as to why the level of car parking proposed is considered to be acceptable.
- 6.141. The Transport Statement has assessed the potential impacts of the proposed development on the local highway network and road safety.
- 6.142. In terms of trip generation, it has been established that the proposed development will generate a total of 40 no. two-way vehicle movements in the AM peak hour, and 37 no. two-way vehicle movements during the PM peak hour.
- 6.143. This proposed increase in traffic is not anticipated to have a material impact on the operation or safety of the local highway network on Mold Road and will be barely perceptible during peak hours, and less so outside of the peak hours. Accordingly, there are no highway or transport related reasons to withhold planning permission for the proposed development. Furthermore, it is not

considered that there is any requirement for any additional assessment of the local highway network.

- 6.144. The accompanying Highways Technical Note (dated 5th June 2026) submitted as part of the Application provides a further detailed technical response to comments raised by Officers at the Local Highway Authority to date in relation to accessibility, visibility splays, car parking, plot parking and trip generation amongst others and should be read alongside the Transport Statement.
- 6.145. As a condition of any planning permission, the Applicant is willing to accept the requirement to submit a Construction and Environmental Management Plan, and which will include details of construction traffic, site compound, contractor parking, and construction hours amongst others.
- 6.146. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies GDP1, GDP2, T8 and T9, LPGN16, TAN18, and PPW12.

Nature Conservation

- 6.147. A detailed Preliminary Ecological Appraisal (PEA) has been undertaken across the Site.
- 6.148. The PEA has assessed the Site for features of ecological importance and in doing so, has considered the impacts of the proposed development on ecological habitats.
- 6.149. The PEA has established the following:
- The Site provides habitat for badger and small mammals, within the scrub, semi-improved grassland, species poor hedgerow, scattered trees, ponds and ditches. It is therefore recommended that a Badger Reasonable Avoidance Measures Method Statement is produced and implemented during works to avoid harm to this species;
 - The Site provides suitable habitat for Water Vole. If works are to occur within 5m of the ponds and ditches adjacent to the Site boundaries, a survey for water vole should be undertaken;
 - The Site provides habitat for hedgehog within the scrub, semi-improved grassland, species poor hedgerow and scattered trees. It is therefore recommended that a Hedgehog Reasonable Avoidance Measures Method Statement is produced and implemented during works to avoid harm to this species. It is advised that gaps of at least 13cm by 13cm are left under any new garden fences to enable hedgehog to roam freely within the area following development;
 - The semi-improved grassland, species poor hedgerow, scattered trees, and scrub provide suitable habitat for nesting and foraging bird species. Vegetation clearance and building

roof works should be undertaken outside of the nesting bird season to avoid any impact on nesting birds;

- Bat records were returned within 2km of the Site. The closest record was 196m south of the Site. No buildings are present on the Site. The habitats on the Site provide moderate suitability for commuting and foraging bats and will require bat activity surveys to be carried out once a month between April and October, along with the deployment of two static bat detectors for a minimum of five nights per month. The trees within the Site boundary were assessed to provide negligible to low potential for bats; and
- No non-native species were identified on the Site.

6.150. The PEA contains a number of enhancement measures in Section 5, including the provision of bird boxes, bat features and landscaping works. These are shown on the submitted Bird and Bat Box Plan and Landscape Plans. These measures are also consistent with the enhancement measures set out in Section 6 of the accompanying Bat Activity Survey and Static Detector Report.

Bats

6.151. In line with the recommendations of the PEA, a Bat Activity Survey and Static Detector Report is submitted as part of this Application. This has concluded the **low to moderate** levels of bat activity were recorded during the bat activity survey on 21 May 2026 and static deployment, with common pipistrelle, soprano pipistrelle, noctule, Natterer's bat and Daubenton's bat species found using the Site for commuting and foraging. Activity was predominantly concentrated to the north and east of the Site, where habitats are to be retained and enhanced. Due to the low to moderate levels of bat activity recorded throughout the surveys, and areas of key commuting and foraging habitat to be retained and enhanced, it is considered that there will be no adverse impact on bats provided the recommendations set out in Section 7 of the Bat Activity Survey and Static Detector Report are followed;

Great Crested Newts

6.152. Given the location of the Site in close proximity to 6 no. ponds and 2 no. ditches, these have been assessed for their potential to support Great Crested Newts. In doing so, it was assessed that Ponds 1 to 4 have **average** suitability for Great Crested Newts for breeding, Pond 5 has **poor** suitability and Pond 6 has **below average** suitability.

6.153. The 2 no. ditches along the eastern and southern boundaries of the Site were assessed as having **excellent** suitability for use by Great Crested Newts for breeding.

6.154. In light of these findings, and as shown on the submitted Site Layout, a dedicated Great Crested Newt Mitigation Area is proposed as part of the development, located adjacent to the eastern edge

of the Site and separated from the proposed built form by public open space. This is intended to avoid and mitigate direct impacts to the species as a result of the proposed development and associated works. The Mitigation Area will comprise 2 no. ponds, hibernacula and boundary hedging, and the enhancement of the existing grassland that is present.

- 6.155. As part of this Application, the Applicant has prepared a Great Crested Newt Mitigation Strategy; this is intended to ensure that the proposed development will not have a detrimental impact on the conservation status of Great Crested Newts in the locality during construction and post-construction (though a long-term management plan).
- 6.156. The Applicant's approach is considered to align with the requirements of the Council's LPGN35: Great Crested Newt Mitigation Requirements and best practice.

Summary

- 6.157. As outlined earlier in this Section, the Application is also supported by a Landscape and Ecological Management Plan covering a period of 30 years. This contains a series of management objectives and detailed proposals to annually maintain the soft ecological areas across the Site during that period and represents a firm commitment on the part of the Applicant to ensure that a high-quality green infrastructure network is provided and maintained across the Site.
- 6.158. Accordingly, and subject to following recommendations set out in the Survey, the proposed development is considered to respond positively to and is consistent with UDP Policies Ec6 and GDP1, LPGN32, LPGN35, TAN5 and PPW12.

Flood-Risk and Drainage

- 6.159. As documented in Section 2 of this Statement, the Site lies in Flood Zone A. It is therefore deemed by Natural Resources Wales to be at a low risk of surface water, groundwater, fluvial and tidal flooding, as confirmed in the accompanying Flood Consequences Assessment and Drainage Strategy. The Site is also not deemed to be at risk of flooding from artificial sources (reservoirs/canals/sewers).
- 6.160. In accordance with TAN15 and the latest national standards on Sustainable Urban Drainage Systems documented in the Flood and Water Management Act 2010, a drainage strategy has been prepared and is submitted with the Application (as set out in the accompanying Flood Consequences Report and Drainage Strategy and shown on Drawing Ref. 7956 / SK01 Rev. J). This has identified the proposed surface water and foul water drainage solutions as set out in Section 4 of this Statement. Full details of the proposed drainage solution will need to be agreed in consultation with the statutory consultee bodies (LLFA and Welsh Water).

6.161. Accordingly, and subject to the recommendations set out in the FCA and Drainage Strategy, the proposed development is considered to respond positively to and is consistent with UDP Policies EC12, GDP1 and GDP2, TAN15 and PPW12.

Noise Impact Assessment

6.162. Given the location of the Site adjacent to Mold Road, and its proximity to the Wrexham-Bidston Railway Line, a Noise Assessment has been undertaken and is submitted with the Application. In conclusion, this has established that:

- Road traffic noise levels are such that some modest noise mitigation measures will be required to ensure appropriate control of external and internal noise levels;
- Railway noise levels are low, and as such no specialist noise mitigation measures for the control of external and internal noise levels will be necessary; and
- An appropriate sound insulation scheme for the proposed development can be provided, comprising:
 - Double glazed windows, where required;
 - Trickle vent ventilation, where required; and
 - Acoustic fencing to rear gardens, where required;

6.163. The Site Layout has had regard to the findings of the Noise Impact Assessment in respect of the siting and orientation of residential plots within the Site.

6.164. A Scheme of Noise Mitigation is capable of being secured by way of planning condition.

6.165. Accordingly, and subject to the recommendations set out in the Noise Impact Assessment, the proposed development is considered to respond positively to and is consistent with UDP Policy GDP1 and PPW12.

Air Quality Assessment

6.166. An Air Quality Impact Assessment (AIA) has been prepared and is submitted as part of the Application. This Assessment has been undertaken given that the nature of the proposed development could potentially lead to adverse air quality impacts at sensitive locations during the construction and operational phases, as well as the exposure of future residents to any existing air quality issues at the Site.

6.167. The headline findings from this Assessment are as follows:

- During the construction phase of the proposed development there is the potential for air quality impacts as a result of fugitive dust emissions from the Site. Site-specific dust control measures were subsequently determined. Following implementation, the residual significance of potential air quality impacts from dust generated by earthworks, construction and trackout activities are predicted to be **not significant**;
- Potential impacts during the operational phase of the proposed development may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the Site. Due to the low number of vehicle trips generated by the proposed development, air quality impacts are predicted to be **not significant**. The dispersion modelling results predicted that annual mean NO₂, PM₁₀ and PM_{2.5} concentrations across the Site were below the relevant AQOs at the proposed sensitive use; and
- The proposed development has the potential to expose future residents to elevated pollution levels. Dispersion modelling was therefore undertaken and results verified. The results of the dispersion modelling assessment indicated that predicted annual mean NO₂, PM₁₀ and PM_{2.5} concentrations were below the relevant AQOs across the proposed development. As such, the Site is **considered suitable** for the proposed end use from an air quality perspective.

6.168. The findings of the AIA demonstrate that the Site is suitable for the proposed residential land-use.

6.169. Accordingly, and subject to the recommendations set out in the Air Quality Assessment, the proposed development is considered to respond positively to and is consistent with UDP Policy GDP1 and PPW12.

Welsh Language

6.170. As set out previously in this Statement, the Site was proposed to be allocated under Policy H1 of the emerging Replacement Wrexham Local Development Plan prior to its withdrawal. Given the nature of the proposed development now subject to this Application, as an affordable housing scheme for local people, it is not considered that the proposed development would cause harm to the Welsh language and would not conflict with UDP Policies GDP1 and GDP2, TAN20 and PPW11. Indeed, it is considered that the proposed development will help to retain local people with a connection to Gwersyllt and Wrexham County, in turn having a neutral to minor positive impact on the Welsh Language, potentially reducing levels of out-migration (and with it an otherwise negative impact on the Welsh Language).

6.171. A number of enhancement measures could be considered which would support the local community and linguistic effects. These could include bi-lingual street names and signage, local advertisement/marketing of the properties, the preparation and submission of a Construction Method Statement, and a detailed lighting design.

Planning Conditions

6.172. As outlined within this Statement, the Applicant is willing to accept a number of planning conditions related to the proposed development where these satisfy the six tests set out in the Welsh Government Circular published in October 2014 and WGC 016/2014. These include, amongst others:

- All drawings/plans submitted for Approval;
- Drainage (surface water and foul water);
- Materials;
- Construction and Environmental Management Plan;
- Tree protection measures (as per Arboricultural Method Statement);
- Landscape and Ecological Management Plan;
- Great Crested Newt Mitigation Strategy;
- Bat Activity Survey and Static Detector Report (and recommendations contained within);
- Reasonable avoidance measures (as per PEA);
- Scheme of Noise Mitigation; and
- Street lighting.

Planning Obligations

6.173. The Applicant is committed to engaging in discussions with Officers at Wrexham County Borough Council in relation to securing planning obligations where these satisfy the requirements set out in UDP Policy GDP2 and Regulation 122 of the Community Infrastructure Levy Regulations which require that:

- The obligations must be necessary to make the proposed development acceptable in planning terms;
- The obligation must be directly related to the proposed development; and
- The obligations must be fairly and reasonably related in scale and kind to the proposed development.

6.174. Any requests for financial contributions consistent with the aforementioned policy tests must be justified by up-to-date evidence.

6.175. The S106 Agreement would include a planning obligation to secure 25% of the affordable housing as required by Policy H7 of the UDP, Local Planning Guidance Note 28, and consistent with the Local Housing Market Assessment 2024.

7 CASE FOR DEVELOPMENT

- 7.1. Having regard to the Technical Assessment in Section 6 of this Statement, this Section goes on to consider the proposed development in the context of the overarching objectives of sustainable development as documented in paragraph 2.28 of PPW11.

Social Benefits

- 7.2. The proposed development will deliver the following **Social** benefits:
- The delivery of 83 no. new dwellings in Wrexham County Borough where there is an evidential need for new affordable housing as set out in the LHMA, the Council's Affordable Housing Prospectus, and the Housing Register/Tai Teg Register. The proposed development will involve the development of land previously allocated for housing in the Replacement Wrexham LDP prior to its withdrawal – as such, the Site has previously been adjudged to be suitable and sustainable for a residential land-use by the Council and the Local Development Plan Inspector. Its proposed development will provide for a logical extension to the settlement of Gwersyllt at its south-eastern edge and will not compromise the role and function of the Green Barrier in this location;
 - The delivery of 83 no. affordable homes, significantly in excess of the minimum 25% required by Policy H7 of the Wrexham Unitary Development Plan, Local Planning Guidance Note 28 and Table 11 of the Local Housing Market Assessment 2024. These will comprise a mix of 1, 2, 3 and 4 bedroom homes across affordable and intermediate rented tenures reflecting the findings of the LHMA, the Council's Affordable Housing Prospectus, and the Housing Register/Waiting Lists and which will be accessible by local people; and
 - The creation of a high-quality living environment which is a) proportionate to the size of the settlement based on an acceptable density per hectare, b) positively contributes to the character and appearance of the Site and its context by raising the quality of design in the area, and c) is consistent with the Council's LPGNSs, Technical Advice Notes, and the placemaking aspirations set out in PPW11.

Economic Benefits

- 7.3. The proposed development will deliver the following **Economic** benefits:
- The creation of direct construction jobs (on and off-site) over the lifetime of the build programme, and indirect jobs through the local supply chain via the purchase of goods and services;

- Increased local expenditure (convenience, comparison, leisure, services) to help support and sustain the local community and businesses;
- Annual Council Tax contributions to Wrexham County Borough Council from the 83 no. proposed new dwellings;
- Gross Value Added to the local economy generated by future residents of the proposed development; and
- Potential planning obligations where these satisfy Regulation 122 of the CIL Regulations, including a financial contribution towards primary and secondary education if justified.

Environmental Benefits

7.4. The proposed development will deliver the following **Environmental** benefits:

- Existing trees and hedgerows within and at the perimeter of the Site will be retained wherever possible, other than where removal is required to facilitate the proposed development. Landscaping, including new tree and hedgerow planting across the Site, provides the opportunity to achieve net gains in biodiversity whilst at the same time minimising the landscape and visual impacts of the proposed development;
- The proposed development is not likely to give cause to the loss of any features of significant ecological value, nor cause harm to any protected species. A Great Crested Newt Mitigation Area is proposed adjacent to the eastern edge of the Site to provide a dedicated mitigation zone for these protected species;
- The proposed surface water drainage measures which will not increase or exacerbate flood-risk or surface water run-off elsewhere;
- The creation of safe and adoptable access arrangements from Mold Road, and which will facilitate and encourage safe pedestrian and cycle movements by connecting to the existing network through the creation of new footway linkages;
- Development on a sustainable site which provides the opportunity for future residents to travel by foot and public transport to access shops, education, jobs and services, reducing the reliance on private car travel and with it providing for a reduction in carbon emissions. The Site's location means that future residents will enjoy very good access to education, shops and services by walking and cycling, provided for through new and safe linkages,

consistent with the guidance criteria set out in Section 4 of the accompanying Transport Statement. Where the use of the private car is required, the proposed development will have a barely perceptible impact on the highway network and road safety;

- The proposed development will not have any adverse impact on the historic environment, including the setting and significance of nearby heritage assets;
- The proposed development will not create any adverse impacts in relation to noise, contamination and air quality/odour; and
- Construction of energy efficient homes using established techniques which the Applicant applies to all of its new-build properties.

Cultural Well-Being

7.5. The proposed development will deliver the following **Cultural** benefits:

- The Applicant recognises that the proposed development presents the opportunity for an overall positive community and linguistic impact. To this end, and if deemed necessary, they are willing to consider the provision of bilingual signage within the proposed development amongst other measures such that the proposed development has the potential for a positive community and linguistic impact;
- The proposed development will not cause harm to any existing heritage assets nor assets of cultural significance; and
- There is no evidence to suggest or support any view that the proposed development cannot be integrated within the settlement, and nor that it would impact on the safety and cohesion of the community. As outlined earlier in this Statement, the Site was allocated under Policy H1 of the Replacement Wrexham Local Development Plan for 96 no. dwellings prior to its withdrawal, and its suitability for a residential land-use was fully tested as part of that plan-making process by independent Inspectors at the Examination in Public.

8 CONCLUSIONS

8.1. This Statement has been prepared in support of a detailed planning application for the proposed development of Land at Mold Road, Gwersyllt, Wrexham.

8.2. The description of development for which detailed planning permission is sought is:

“Residential development at Land at Stansty Fields, Mold Road, Gwersyllt, Wrexham, LL11 4AX”

8.3. This Statement has demonstrated that whilst the proposed development would conflict with Policy EC1 of the adopted UDP, the latter is now time-expired together with the evidence underpinning it.

8.4. Following the withdrawal of the Replacement Wrexham Local Development Plan in March 2026, the UDP remains the development plan for the purposes of this Application; the weight to be afforded to the policies contained within the UDP will depend on their consistency with national planning policy set out in PPW12.

8.5. As set out in Section 5 of this Statement, the Plan period for the UDP expired back in 2011 and it is now considerably out-of-date together with the evidence base which underpinned it. This includes the settlement limits shown on the UDP Proposals Map, and which are controlled by Policy H5. Accordingly, the weight to be afforded to these policies is severely diminished and the UDP settlement limits are out-of-date and in need of urgent review and adjustment.

8.6. The evidence that underpins the withdrawn Replacement Wrexham Local Development Plan is, in every respect, more up-to-date than the evidence that underpins the UDP. Moreover, the withdrawn LDP has been subject to Examination in Public, with the Inspectors concluding that subject to the binding changes set out in their Report (which have been incorporated into the final version of the Written Statement and Proposals Maps), *“the Wrexham Local Development Plan satisfies the requirements of section 64(5) of the 2004 Act and meets the procedural requirements and tests of soundness.”* To this end, its evidence base can still carry weight in the determination of this Application.

8.7. As documented in Section 5 of this Statement, the Site was allocated for a residential use in the Replacement Wrexham Local Development Plan under Policy H1, Site Ref. 7, for 96 no. dwellings. The settlement boundary of Gwersyllt was amended accordingly such that the Site was located within it. In doing so, the Council and the Replacement Wrexham Local Development Plan

Inspectors accepted that the Site was a suitable and sustainable location for a residential land-use of 96 no. dwellings.

- 8.8. The proposed development now subject to this Application would continue to represent a logical extension to the settlement at its south-eastern edge delivering a balanced mix of much-needed, high-quality affordable housing which provides for the efficient and sustainable use of the land. It has been demonstrated that the release of the Site for development will not conflict with the five purposes of including land within the Green Barrier, consistent with the conclusions of the Council's own Strategic Green Wedge Review prepared as part of the Replacement Wrexham Local Development Plan evidence base.
- 8.9. The proposed housing mix responds to identified affordable housing needs. There is a **significant unmet housing need across the County as a whole, including within Gwersyllt as an Urban Village**. The delivery of new affordable housing should be directed towards those areas with an identified need and which are sustainable enough to accommodate the proposed level of growth presented as part of this Application.
- 8.10. The Joint Regional Homelessness Strategy identifies the need to increase affordable housing delivery across the County and the proposed development will do just that through the provision of affordable rented and intermediate rented homes for local people who are registered on the waiting list. This in turn will help the Council to meet its identified affordable housing needs and with it support a wide range of households with urgent accommodation needs, including those who are homeless.
- 8.11. In determining this Application and assessing the compliance of the proposed development with the development plan, it is considered that the following weighting should be applied in the planning balance:
- The proposed development should attract **very significant weight** for the delivery of a balanced mix of 83 no. new affordable homes (affordable and intermediate rented) responding to the significant affordable housing delivery shortfall in Wrexham since 2013/14 and proven annual net needs at a local, HMA and County-wide level as evidenced within this Statement, consistent with paragraph 4.2.26 of PPW12. The proposed dwellings will be managed by a Registered Provider and remain affordable in perpetuity consistent with the requirement of paragraph 4.2.35 of PPW12. The proposed development will deliver 62 no. additional affordable homes over and above the Policy requirement set by UDP Policy H7, Local Planning Guidance Note 28, and Table 11 of the Local Housing Market Assessment 2024, a significant benefit. Whilst the scale of the proposed development exceeds 5 no.

dwellings as set by Policy H8 of the UDP, this Policy is out-of-date; paragraph 4.2.26 of PPW12 affords significant weight to the delivery of affordable housing as a material planning consideration, with paragraph 4.2.35 set out the important role that affordable housing exception sites will have to play in meeting proven affordable housing needs;

- **Positive weight** should be afforded to the efficient use of a greenfield parcel of land at the edge of the defined settlement boundary of Gwersyllt, one of the most sustainable locations for growth in the County Borough as a designated *Urban Village*, to deliver much-needed new affordable homes;
- **Positive weight** should be attached to the ability to deliver 83 no. high-quality dwellings and a sustainable living environment consistent with the development plan and national planning policy placemaking objectives, ensuring that the scale, design and siting of the proposed dwellings will conserve the settlement's character and setting, and that the proposed dwellings are of an appropriate and sensitive scale and design so not to unduly harm the character and appearance of the countryside;
- **Positive weight** should be attached to the associated economic benefits of the proposed development;
- **Positive weight** to the net biodiversity benefits that are capable of being achieved on the Site, in line with the development plan and national planning policy/legislative requirements;
- **Positive weight** to the provision of green infrastructure, ecological enhancement and public open space that is capable of being provided within the Site, integrated as part of the proposed development, full details of which can be secured by way of planning condition;
- **Moderate weight** should be attached to the potential neutral to minor positive impact on the Welsh Language, providing new affordable homes for local people who wish to continue to live in Gwersyllt, the North Wrexham and Gresford HMA and Wrexham County, but who otherwise struggle to access a home as a result of increasing house prices/affordability constraints and housing stock availability;
- **Limited weight** should be afforded to the spatial and visual change to the Green Barrier arising from the proposed development. The Site is well-contained, benefiting from natural field boundaries, and there are permanent and defensible boundaries which mean that the development of the Site would in no way cause issues of coalescence with neighbouring

Wrexham Town and settlement areas. The proposed development will not compromise the role and function of the Green Barrier in this location; and

- **Limited weight** to the minor loss of Grade 3a agricultural land when balanced against the wider social, economic and environmental benefits set out in Section 7 of this Statement.

- 8.12. In the overall planning balance, the proposed sustainable development is considered to be acceptable, **collectively delivering social, economic, environmental, cultural well-being and public benefits which, as presented throughout this Statement, can amount to very exceptional circumstances.**
- 8.13. As it stands, there is a policy vacuum in Wrexham, whereby there is no up-to-date development and spatial strategy to meet the affordable housing needs of the County Borough in the short-term (i.e. at least the next five years). There is a pressing need to deliver new affordable housing in Wrexham, and the proposed development would involve a suitable and sustainable Site on which to contribute towards these outstanding needs consistent with key objectives of national planning policy set out in PPW12, the Future Wales – *National Plan*, and TAN2.
- 8.14. The Applicant therefore kindly requests that detailed planning permission be granted in accordance with paragraph 1.18 of PPW12.