

Vicarage Lane Action Group

www.vicaragelaneactiongroup.co.uk

22nd January 2019

Mared Rees-Jones
WCBC Planning
16 Lord Street
Wrexham
LL11 1LG

Re: Proposed residential development for 44 no. residential dwellings (of which 25% - 11 no.) will be affordable), public open space, landscaping, means of highway and pedestrian access, local highway and pedestrian infrastructure improvements along Vicarage Lane, foul sewerage pumping station and new off-street resident parking provision for existing residents at Land West Of Bryn Isa Vicarage Lane Gresford Wrexham (P/2018/1063)

Dear Ms Rees Jones

I would like to object in the strongest possible terms to the planning application for 44no. residential dwellings on Vicarage Lane, Gresford (P/2018/1063) and ask that you recommend it be refused. I present this objection on the following grounds.

Contravention of UDP policies

The applicant states the proposed development should be assessed in part with reference to the policies of the emerging LDP in accordance with the guidance on the use of emerging local plans in Planning Policy Wales 9 (PPW9) para 2.14.1. (J10 Planning Statement, December 2018, para 2.9) However, as of December 2018, PPW9 has been superseded by Planning Policy Wales 10 (PPW10). Significantly, PPW10 contains no such provision as appears in PPW9 para 2.14.1. The proposed development should therefore be assessed according to the policies contained within the current adopted Unitary Development Plan (UDP) and PPW10.

The proposed development is contrary to a number of policies in the UDP and PPW10. Specifically, the development would be outside the settlement limit and therefore contrary to UDP policies PS1 and H5. It would, moreover, constitute inappropriate development within the Green Barrier and is therefore contrary to UDP policy EC1 and PPW10 paras 3.68 – 3.71. The development would also involve the loss of BMV Grade 3a agricultural land, contrary to UDP policies PS3, EC2 and PPW10 paras 3.54 – 3.55. The ecology report submitted along with the planning application identified an important hedgerow situated at the proposed entrance to the new development. (Kingdom Ecology Report, 6 November 2017, para 4.1.4) The removal of a significant part of this hedgerow, which is protected under the Hedgerow Regulations 1997, to accommodate the development entrance and new housing frontages would be contrary to UDP policy EC4. The development site is also within a Special Landscape Area and is therefore subject to UDP policy EC5. EC5 places strict controls on development within Special Landscape Areas other than for specific purposes, none of which are applicable to the proposed development.

The applicants have attempted to demonstrate that there are exceptional circumstances for approving the development despite its contravention of local and national planning policies. For example, the applicant claims the development will deliver the first affordable houses to be built in Gresford since the 1950s. (J10 Planning Statement, para 1.24) However, this statement ignores the houses built at Parsonage Close, Gresford by Grwp Cynefin (P/2015/0144) and at Bryn Y Groes, Chester Road, Gresford (P/2007/0100).

Dis-application of TAN1, para 6.2

Technical Advice Note (TAN) 1: Joint Housing Land Availability Studies (2015) para 6.2 has been dis-applied by the Welsh Government as of 18th July 2018. This was intended to relieve pressure on local authorities that cannot demonstrate a 5-year housing supply – which is the majority of local authorities in Wales – from being unduly pressured into approving developments that would otherwise be inappropriate. The dis-application of TAN1 para 6.2 is highly pertinent to this case. The proposed development is clearly contrary to a number of UDP policies; it should not be permitted despite these policies simply because WCBC is unable to demonstrate a 5-year housing supply.

Proposed site previously assessed and found unsuitable for development

The proposed site has been deemed inappropriate for development on a number of occasions by WCBC previously. The owners attempted to promote the site for development during the consultation on the drafting of the UDP. However, Planning Officers noted in response that they considered the site unsuitable for development. (See Wrexham Unitary Development Plan Public Deposit Edition - Summary of Representations and Responses, May 2001, H1/578/234 at p. 74, H8/579/234 at p. 122) I have attached a copy of the relevant extracts of this document along with my letter. (See Appendix 1)

The site was also deemed inappropriate for development during the preparation of LDP1. (Report to Planning Committee, Report no. HCWD/26/11, 4th July 2011, Appendix 2, site ref GR03LDPAS at pp. 141–2, site ref GR06LDPAS at pp. 143–4) An adjacent site at Trewythen Hall, Vicarage Lane was similarly deemed inappropriate. (Report to Planning Committee, Report no. HCWD/26/11, 4th July 2011, Appendix 2, GR09UDPAS at pp. 145–6) Please find a copy of the relevant extracts from this document in the appendix to this letter. (See Appendix 2)

More recently, the site was deemed inappropriate for development during the preferred strategy stage of the forthcoming LDP2. (Wrexham Local Development Plan 2013 – 2028 Preferred Strategy - Site Register, February 2016, site ref GRE15CS at p. 210) Again, the adjacent site at Trewythen Hall, Vicarage Lane was also deemed inappropriate. (Wrexham Local Development Plan 2013 – 2028 Preferred Strategy - Site Register, February 2016, site GRE08CS at p. 203) Relevant extracts from this document are also included in the appendices to this letter. (See Appendix 3)

Indeed, a planning application for a much smaller, less intrusive development on the adjacent site at Trewythen Hall (P/2014/0815) was refused and dismissed on appeal (APP/H6955/A/15/3095184). The appeal inspector concluded the development would constitute inappropriate development on Green Barrier land.

The site has consistently been found to be inappropriate for development and the current proposal should therefore be refused in line with the longstanding public views of WCBC.

Excessive additional traffic generation

Based on the TRICS-based average vehicular trip rates provided by AXIS in the Transport Statement, it is forecast that the development would generate 254 additional two-way trips daily along Vicarage Lane. (AXIS Transport Statement, para 5.2.4 and table 5.1) When subjected to a sensitivity test, based on traffic flow rates from a site at Kensington Grove, Wrexham, this number was revised up to 335 daily two-way trips. (AXIS Transport Statement, 5.3 and tables 5.2 – 5.3) Either of these numbers would represent a very significant increase on the current traffic volumes. Based on the figure of 956 for current two-way weekday flows (as at AXIS Transport Statement, para 2.6.4), 254 additional movements would represent an increase of 26.57%, while 335 additional movements would represent an increase of 35.04%.

Looking the current traffic volumes at the AM and PM peak hours in the provided ATC counts, these give average peak AM two-way flows of 74 and average peak PM two-way flows of 101. (AXIS Transport Statement, Appendix 2) The TRICS-based forecast suggests the proposed development would add 26 two-way movements at AM peak and 24 movements at PM peak (AXIS Transport Statement, table 5.1); this would represent an increase of 35.14% and 23.76% respectively. Using the forecast AM and PM peak flows produced by the sensitivity test (AXIS Transport Statement, table 5.2), the forecast increase is 35.14% at AM peak and 31.68% at PM peak.

It is worth comparing these figures with those forecast for a proposed development at Pont Adam Crescent, Ruabon (P/2014/0241), which was refused and later dismissed on appeal (APP/H6955/A/14/2229577). The site at Pont Adam Crescent entailed a number of highways issues similar to those present on Vicarage Lane, namely portions of highly constricted roadway and inadequate pedestrian footway provision along the B5097. During the appeal, the inspector concluded that the potential increase at peak hours of 12.5% in traffic volume 'would be significant'. (APP/H6955/A/14/2229577, para 22) Given that the potential increase at Vicarage Lane could be up to almost three times that forecast at Pont Adam Crescent, the urgent concerns I and other residents have over the proposed scheme must be thrown into sharp relief. Such an increase in traffic would doubtlessly cause intolerable congestion and would pose a danger to pedestrians and other non-vehicular road users. Indeed, these concerns have been echoed by WCBC Highways Officers. In a letter to the applicants dated 18th September 2018, the Highways Officer noted that 'the proposed development has the potential to generate in excess of 300 additional vehicle movements per day along this section of Vicarage Lane which is considered to be a significant increase compared with existing traffic flows along this lane.' (J10 PAC Report, Appendix B)

It is also worth bearing in mind that Vicarage Lane is already used as a rat run to Wrexham Industrial Estate (WIE). The construction of 365 houses on land at Home Farm, Gresford Road, Llay (P/2014/0905) will further add to the traffic on Vicarage Lane as many residents from the new houses in Llay will no doubt be working at WIE. The effect of this would be to magnify any increase in traffic that would result from the proposed development on Vicarage Lane.

In summary, the proposed development is forecast to generate a significant increase in traffic volume and this increase would be unacceptable on road which struggles to cope with current traffic volumes.

Unsuitability of the proposed traffic mitigation system

I contend that the traffic mitigation scheme being proposed along the constrained section of Vicarage Lane as it approaches the traffic lights on Chester Road would not adequately remedy the identified highways issues and would, in fact, likely lead to increased congestion.

The applicants have provided a record of correspondence and meetings with WCBC and various statutory consultees in the Planning Statement and the Pre-Application Consultation Report. This shows that, even from the initial meeting with the applicants on 1st August 2017, WCBC Highways Officers have had concerns over the impact the proposed development would have on vehicular and non-vehicular users of Vicarage Lane. (J10 Planning Statement, Appendix A) Importantly, this record of correspondence also demonstrates that long-held concerns over the efficacy of the proposed traffic mitigation scheme have not been heeded. These concerns were expressed in a letter to the applicants dated 12th October 2017. (J10 Planning Statement, Appendix A) The same essential concerns were reiterated in a letter to the applicants dated 18th September 2018 as part of the pre-application consultation process. (J10 PAC Report, Appendix B) Despite this, the proposed traffic management

scheme remains the same as that presented as part of the pre-application consultation in August 2018. (See Curtins Transport Statement, 12th March 2018)

The reservations of WCBC Highways Officers vindicate the residents and regular users of Vicarage Lane who have expressed similar concerns. At a residents meeting held at Gresford Memorial Hall on 3rd September to discuss the proposed plans, people were asked to fill in contact/comment forms. 58 forms were returned, 33 with comments. 1 comment was neutral, while the remaining 32 expressed objections. 27 of the comments containing objections raised concerns over highways. Additionally, of the 24 comments sent to J10 Planning during the pre-application consultation period, 21 raised concerns over highways. (J10 PAC Report, pp. 17 – 21) The fact that in both instances such a high percentage of comments flagged highways issues demonstrates the level of concern local residents have over the potential highways impact and the inherent unsuitability of Vicarage Lane to accommodate a new housing development. The applicant has, however, largely ignored the concerns expressed by residents in their Pre-Application Consultation Report, instead playing down issues and insisting that the proposed traffic mitigation scheme will – despite the reservations of Highways Officers – be effective. Residents feel extremely aggrieved that these concerns are being ignored.

In their letter dated 18th September 2018, WCBC Highways Officers noted that the proposed traffic mitigation scheme would be ‘unacceptable’. The letter goes on to identify a number of specific potential issues with the proposed traffic scheme. These may be summarised as follows:

- 1) Westbound traffic may fail to see eastbound traffic arriving from Chester Road or Old Wrexham road in time to be able to stop and give way in the designated passing place. This would force eastbound traffic to stop and give way, which could lead to traffic backing up into the Chester Road junction.
- 2) Cars parking along the restricted section of Vicarage Lane could make the road impassable, especially for HGVs and other large vehicles.
- 3) The position of the swept curb would make it difficult for vehicles to turn into Old Wrexham Road from Vicarage Lane without encroaching over the centreline of the road.

In addition to this, there are a number of other potential problems that I could foresee arising from the proposed traffic management system. Agricultural vehicles, HGVs, and other large slow-moving vehicles necessarily travel along Vicarage Lane on a daily basis. Any traffic management scheme would have to be able to accommodate these vehicles effectively. However, I contend that the proposed scheme fails to do this.

For example, consider a situation whereby a westbound HGV begins moving towards the traffic lights while they are on green, but the lights turn red part way through movement. Please see the plan appended to this letter. (See Appendix 4)

In this situation, the following problems arise:

- 1) The designated passing place is too small to allow the HGV to turn in sufficiently so as to leave adequate room for an eastbound vehicle to pass it.

- 2) If the HGV proceeded to wait at the traffic lights, it would block the box junction and thus prevent traffic accessing Old Wrexham Road. If vehicles have to wait to access Old Wrexham Road, this could result in traffic backing up onto the Chester Road junction.

Indeed, the problem of vehicles blocking the box junction leading to Old Wrexham Road is not specific to HGVs. Any vehicle larger than an average sized car would encroach upon the hatched area of the box junction. This includes large vans, the likes of which use the road on a daily basis to deliver parcels and groceries, to perform home improvement/repair works, and to travel to and from Wrexham Industrial Estate. This encroachment of the box junction, in combination with the swept curb on the corner of Vicarage Lane/Old Wrexham Road, would make it impossible for vehicles to turn onto Old Wrexham Road. The box junction could also very easily be blocked in a situation whereby a vehicle travelling from Old Wrexham Road pulls out to wait at the traffic lights as westbound vehicle is in the final stages of passing through the proposed mitigation system on Vicarage Lane. This would force the westbound vehicle to wait in the box junction and completely block access to Old Wrexham Road. It bears repeating that if vehicles have to wait to turn into Old Wrexham Road in any of these situations, it becomes highly likely that traffic could be forced to back up onto the Chester Road junction. Indeed, occurrences of incidents of conflict and congestion caused by traffic waiting to turn on to Old Wrexham Road carry an increased likelihood in future due to the recent approval of 12 new houses to be built on Old Wrexham Road (P/2018/0166).

Moreover, the proposed traffic scheme will severely impede the vehicular access for existing residents at 1 and 2 Vicarage Lane. I refer you to the diagram in Appendix 5. Eastbound vehicles waiting at the give way markings would block access to the rear of 2 Vicarage Lane. When approaching eastbound from the traffic lights, residents of 2 Vicarage Lane could not wait for the vehicles to clear as they would be preventing the westbound vehicles from moving forward. Any other eastbound traffic would also be forced to stop, thereby potentially backing traffic up to the junction. Similarly, residents of 1 Vicarage Lane would find that access to/from their garage is routinely blocked by vehicles waiting in the designated passing place.

All the above points demonstrate the complete unsuitability of the proposed traffic mitigation scheme. The applicants have attempted to demonstrate its workability with reference to a supposedly comparable scheme at Marl Drive, Llandudno Junction. However, I contend that the Marl Drive scheme is in no way comparable to that which is being proposed on Vicarage Lane. The Marl Drive scheme is fundamentally different in that its context lacks any of the constraints that define the situation at Vicarage Lane. Specifically:

- 1) The traffic lights at the junction on Chester Road essentially control how traffic is able to move into and away from the proposed Vicarage Lane scheme. Many of the entirely foreseeable issues with the Vicarage Lane scheme revolve around its proximity to and its symbiotic relationship with the traffic light junction. Eastbound traffic would be forced into the scheme to avoid impeding traffic at the traffic lights; meanwhile, the ability of westbound traffic to move away from the scheme would be entirely dependent on the changing of the traffic lights. By

contrast, traffic travelling in both directions at Marl Junction is free to move in and out of the one-way scheme at both ends.

- 2) The position of the access to Old Wrexham Road is likely to introduce problems that would cause congestion and the backing up of traffic. These problems have been noted above, specifically: vehicles turning from Old Wrexham Road to travel eastbound along Vicarage Lane may fail to see westbound vehicles travelling through the mitigation scheme; traffic arriving from Old Wrexham Road to wait at the traffic lights while vehicles are travelling westbound along Vicarage Lane would lead to blocking of the box junction and thus prevent access to Old Wrexham Road; large vehicles forced to wait at the traffic lights would block the box junction and prevent access of Old Wrexham Road. If traffic is forced to wait to turn into Old Wrexham Road, this could lead to traffic backing up onto the Chester Road junction. There is nothing within the context of the Marl Drive scheme that is comparable to the potential issues arising as a result of the location of the access to Old Wrexham Road within the context of the proposed Vicarage Lane scheme.
- 3) As has already been noted, the proposed Vicarage Lane scheme would be sited close to and surrounding access for existing residents. This would severely impede access for existing residents and, in doing so, likely lead to congestion and the backing up of traffic. The Marl Junction scheme did not have to account for any similar interactions with existing residential access.
- 4) Vicarage Lane sees a large amount of on-street parking which has the potential to hinder access into and out of the proposed mitigation scheme (see also below on on-street parking). Looking at the road on Google Street View, it does not seem that the scheme at Marl Drive suffers from this problem.

For all the above reasons, I contend that the proposed traffic mitigation scheme is inappropriate and would be ineffective in dealing both with current traffic issues and with potential issues that would arise from the proposed development.

On-street parking on Vicarage Lane

Vicarage Lane sees a large amount of on-street parking as many current residents lack parking provision on their properties. This, combined with the narrowness of the road, makes it difficult for the existing traffic to navigate the road unhindered and contributes to an unsafe environment for pedestrians. A substantial increase in traffic volumes, such as from the proposed development, would increase congestion associated with having to navigate parked cars and constitute an increased risk to pedestrian safety.

The applicants have proposed to provide 11 parking spaces on site for existing Vicarage Lane residents in order to reduce the on-street parking. (AXIS Transport Statement, paras 4.4.4 – 4.4.10) However, I contend that this will not be effective. First, the provision of 11 spaces is inadequate considering the number of cars that currently park on Vicarage Lane. Moreover, residents cannot be compelled to take

up the spaces, and many will prefer to continue parking outside their property; this was in fact pointed out by WCBC Highways Officers in their letter to the applicants dated 18th September 2018. (J10 PAC Report, Appendix B) People who use Gresford Branch Library, many of whom are elderly, currently park on Vicarage Lane. A video traffic survey conducted on 11th January 2019 confirms this, and I can provide this video footage for viewing if required. As there is nowhere else library users are able to park, this situation would continue in future.

I therefore contend that the applicants' proposal will fail to eliminate on-street parking or even reduce it to an acceptable level. Thus the current issues that on-street parking causes would be exacerbated by increased traffic and pedestrian travel resulting from the proposed development.

Insufficient capacity in local healthcare services

On 23rd August 2018, Betsi Cadwaladr University Health Board (BCUHB) made a response to a consultation on a planning proposal for 132 houses in Rossett (P/2018/0560). BCUHB noted that Alyn Family Doctors, which has surgeries in Rossett, Llay, and Gresford and serves approximately 13,000 patients, 'is under pressure' and that 'any additional patient demand will increase existing pressures'.

Although BCUHB recently rejected a request by Alyn Family Doctors to close the Gresford surgery, the surgery has been closed on a temporary since it was spared permanent closure. These intermittent temporary closures look set to continue as the practice faces untenable operating pressures.

Moreover, the services at the Alyn Family Doctors practice are due to come under additional pressure as a result of the aforementioned 365 houses to be built on land at Home Farm, Gresford Road, Llay (P/2014/0905).

As Alyn Family Doctors is already working to capacity by the admission of BCUHB and will somehow have to serve at least 365 additional households once new homes at Llay are built, I fail to see how it would it be able to accommodate residents from the proposed development at Vicarage Lane, Gresford.

Summary and conclusion

I have outlined above what I believe to be the principal points which demonstrate the inappropriateness of the proposed development.

These points may be summarised as follows:

- 1) The development is contrary to a number of policies in the adopted UDP and PPW10.
- 2) TAN1, para 6.2 has been dis-applied by the Welsh Government. WCBC therefore need no longer feel pressured into approving unsuitable and highly inappropriate developments such as this on the basis that they cannot demonstrate a five-year housing supply.

- 3) The proposed site has already been assessed and rejected as a development site on a number of occasions by WCBC.
- 4) The proposed development is forecast to increase traffic volumes on Vicarage Lane by as much as 35%. This would be entirely unacceptable as the road already struggles to accommodate existing traffic volumes.
- 5) The proposed traffic mitigation system will not effectively ameliorate existing or forecast traffic issues and is ill suited to the road and its context.
- 6) It is unlikely that the widespread practice of on-street parking along Vicarage Lane can be eliminated or even reduced to acceptable levels. On-street parking will continue to cause congestion and to constitute a risk to pedestrian safety. These issues would only be exacerbated by an increase in vehicular and pedestrian traffic as a result of the proposed development.
- 7) There is insufficient capacity in the local healthcare services to accommodate residents of the proposed development.

For these reasons, I ask that you recommend the application P/2018/1063 be refused. I would like to request that you include my letter and the appendices in your report for the consideration of the Planning Committee.

Yours sincerely

Vicarage Lane Action Group

Appendices

Appendix 1: Extracts from Wrexham Unitary Development Plan Public Deposit Edition - Summary of Representations and Responses, May 2001



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DRAFT WREXHAM UDP : OBJECTIONS AND REPRESENTATIONS

Address Vicarage Lane South, Gresford

Area 2.8 ha

Subject Housing

Scale 1:2500

Grid Ref. E335140 N354446

Reference(s) H1/578/234, H8/579/234

Appendix 1 cont.

H1/8/234 Gresford Vicarage Lane South	Karen Davenport	Land to the south west of Vicarage Lane, Gresford (OS field number 1545, to the south east of Cragenrasi) should be allocated for development for affordable rural accommodation. Gresford is short of reasonably priced housing and younger members of the community are often forced to leave the area to find housing they can afford. Desired Change: Allocate land south of Vicarage Lane, Gresford for the development of affordable housing and amend settlement limit accordingly.	Disagree. See Response H1/8/79/234.
H1/8/754 Gwersyllt Adjacent Woodlands Farm, Dadds Lane	Leason Homes Ltd	Request the allocation for housing development of an area immediately to the east of the proposed allocation. This would allow a total development of about 30 houses. The site would then be well related in scale and location to existing development, and integrated within the village. Desired Change: Allocate additional land adjacent to site 7, Woodlands Farm Dadds Lane, Gwersyllt (south east of pen ylyn) for housing.	Disagree. The site would encroach into open countryside and cause difficulties on the existing highway network.
H1/84/32 Gwersyllt Griffiths Road	Slansy Park Estate	Objects to the non-inclusion of land in the UDP. The site, previously recommended by one inspector for exclusion from the green barrier and by a second inspector for allocation for housing, is impossible to farm economically because of stock worrying and killing and severe and regular trespass from the adjacent housing estate. Any protection previously given by the former mineral railway line has been removed by the grant of permission for development. Desired Change: Include in settlement and allocate land at Griffiths Road, Gwersyllt (north of Slansy Park Farm) for housing.	Disagree. The site would encroach into open countryside and cause difficulties on the existing highway network.
H1/212/120 Gwersyllt: Lower Slansy	Mt C Jarvis	The land has the benefit of outline planning permission for employment development, but at this stage the economic viability of such a development is in question, taking into account the remedial works required to permit development of the site and the expensive works required to provide a new site access and associated arrangements. The site is a brownfield site and should fully be used in accordance with Government policy. Its development for residential purposes, perhaps with roadside uses, would be an appropriate use of this resource and would help avoid the need to develop greenfield sites. Such a development can be appropriately designed to take advantage of its location adjoining Green Barrier, and can be appropriately shielded from the commercial activities to its north. Desired Change: Site at Lower Slansy, Gwersyllt should be allocated for housing perhaps incorporating roadside uses.	Disagree. To allocate this land for housing would lead to a conflict of interests between industrial and residential uses.
H1/88/54 Gwersyllt: North East of Woodlands Farm, Dadds Lane	Leason Homes Ltd	Objects to non-inclusion of land north east of Woodlands Farm, Dadds Lane, Gwersyllt. Desired Change: Requests the addition of a small area immediately north-east of the site. This would be a minor alteration, would improve the layout of the site and would facilitate easier development with regard to road design.	Disagree. See response H1/8/754.
H1/868/380 Gwersyllt: Summerhill Road	Castlemead Homes	Object to exclusion of land off Summerhill Road Gwersyllt from settlement limit. The land lies to the east of the ridge line and contributes nothing to the Moss Valley, which does perform the function of separating the settlements of Gwersyllt and Moss. The exclusion from the settlement limit of the existing development at Chestnut Court and of the additional land adjacent to that development leaves it vulnerable to unauthorised uses, to the detriment of the amenity of residents. Desired Change: Amend settlement limit at Summerhill Road, Gwersyllt and allocate the land for housing.	Disagree. The site lies within a designated Green Barrier, its development would encroach into countryside extending the settlement limits of Gwersyllt across Summerhill Road. The existing development of low density 'senior executive' housing was a long standing commitment based on government guidance at the time and as a replacement for the former development of the site. These material considerations no longer apply, and Summerhill Road forms the natural physical and definable boundary at this point.

Wrexham Unitary Development Plan Public Consultation: Responses to Comments on the Draft Development Plan

Appendix 1 cont.

31	National Assembly for Wales Planning Division	(Indication should be provided of how need would be demonstrated to the Council's satisfaction when planning permission for such development is sought. Referring to the borough wide needs assessment should be considered. Desired Change: Amend policy to indicate how need would be demonstrated to the Council's satisfaction.	Agree. Add the following after first sentence, paragraph 6.17: "Proposals will be assessed in relation to the Wrexham Housing Needs Survey (1999). This identified a shortfall of just over 1000 social sector dwellings and nearly 600 private rented sector units; this demand varies dramatically between local settlements. However, the areas where demand is being generated may not necessarily be the locations where future needs and demands should be, or can be met given the many and varied local planning constraints."
H8/579/234 Gresford Vicarage Lane South	Karen Daveyport	See Response H1/579/234. Desired Change: Allocate land south of Vicarage Lane, Gresford for the development of affordable housing and amend settlement limit accordingly.	Disagree. The extension to the settlement area would be highly undesirable as it would encroach into the green barrier and Special Landscape Area designation. The allocation would constitute highly unattractive ribbon development along Vicarage Lane, which would detrimentally affect its rural character. The allocation would also result in the coalescence of Gresford with the scattered group of houses to the east at Gresford Bank. This green barrier is therefore essential in conserving the character of the area and would be undermined by the proposed allocation. Its development would also set a precedent for the development of the land surrounding Trewythen Hall and to the east of Old Wrexham Road, which, cumulatively, would destroy the special character and setting of Gresford. Policy H6 permits the development of small groups of affordable housing in appropriate circumstances, although it is highly unlikely that this site would be considered acceptable, given that it does not form a logical extension to the settlement limit.
6.16/213/121	Trefnu Cymunedol Cynnu	Supports the recognition of the need and plans for affordable housing. However, the plan should include a mechanism to judge the extent of need for, and provision of, affordable housing. Desired Change: The retention of paragraph 6.16 along with a mechanism to judge the extent of need for, and provision of, affordable housing to be written in the plan.	Disagree. The planning system is empowered only to provide the general land use conditions within which operational procedures and mechanisms designed to implement affordable housing can be developed.
H9/63/18	The Central Gypsy Council	Requests earlier representation on Circulars 2/94 and 76/94 "Gypsy Sites and Planning" be shown respect. Desired Change: None	Noted.
H9/1202/434	Councillor Klaus Armstrong-Braun Finnish Green Party	Object to Policy. It is illegal, it discriminates against non-gypsy people. If the gypsies were pure Romany (an ethnic race) it could be seen to be right, but the majority are "travellers", tinkers etc. & in law have no more rights in planning than a householder with a caravan. What happens if the site was not needed after a year or so like a forestry or agricultural worker? Would the site be ripe for dwellings as has happened in one of the neighbouring counties a few years ago. Desired Change: Delete policy from plan.	Disagree. See paragraph 9.1.9 Planning Guidance (Wales) Planning Policy - First Revision April 1989. "Local Authorities should indicate the regard they have had to meeting the accommodation needs of gypsies. It is important that local planning authorities make adequate provision for gypsy sites in their development plans."
H10/1204/434	Councillor Klaus Armstrong-Braun Finnish Green Party	Object. Desired Change: Add in ii) after "existing buildings" - "outbuildings" (as in farm building complex).	Disagree (c) (ii) refers to the curtilage of the existing dwelling. This means the land immediately surrounding the dwellinghouse, but within the confines of the boundary. If there are outbuildings outside the curtilage then it would be unacceptable to erect a dwelling in such a location. Policy H3 deals with such instances. Such detail is not required here. It would lead to confusion.

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Housing	Support as potential affordable housing rural exception site or extra care	of traffic and use. 11. Site considered unsuitable in UDP. 12. Support strategy and methodology of LDP.
Highways	Object to site Visibility splay can be met but would require removal of mature trees and an established hedgerow. Close proximity to the village centre but unable to provide a footpath link along Vicarage Lane therefore an unsustainable location.	13. Result in large extra colony 14. Should be retained as Green Barrier and Special Landscape Area.
Relevant Planning History		
None.		
Response and Recommendation		
The site is located on the edge of Grestford in a western village and does not accord with the deposit plan strategy of directing development to within defined settlement limits in order to regenerate brownfield land in either Wrexham Town or the Western villages. In addition, the site has trees and access constraints which would discourage development on the site and as a result is not considered suitable for allocation. There are opportunities for development of affordable housing rural exception sites in the western and rural villages but in this instance there are other sites on the edge of settlement which would be more suitable than this one for such development and the site constraints could not be overcome to allow development in this area. No change to deposit plan.		
Sustainability Appraisal and Habitat Regulation Implications		
Prior to the Deposit Plan this site was appraised using the Council's Sustainability Appraisal Candidate Site Methodology and rejected at stage 1 (not compliant with the Preferred Strategy). The representative has not presented additional information in relation to the appraisal, the onus of proof the site is compliant with the SA/SEA requirements rests with the representative. No information has been supplied with regards to the Habitats Regulations. If this site were to be allocated by the inspector further assessment on the SEA/SA/Habitats would be required.		

Suggested site for development: GR06LDPAS: Vicarage Lane South, Gresford		Community: Gresford	Ward: Gresford East and West
Settlement: Gresford/Marford			
Current Use: Agricultural			
Proposed Use: Residential / Extra Care			
Area (Ha): 2.8			

Internal Comments

Landscape Open countryside and SLA providing attractive rural views from adjacent residential properties; well maintained hedgerow frontage with scattered mature hedgerow trees; rural character and qualities are strong and need to be conserved. Recommendation: Discount site

Ecology There are some reasonably good hedgerows and a valuable in field tree. An ecological survey will be required and enhancement of part of the site for newts and other wildlife.

Trees Developable. Trees and hedgerows within the site, however these will not be a constraint to development, subject to a full BS5837 assessment and high quality trees and hedgerows being incorporated into the development design.

External Comments

CCW GCN within 500m of site.

Mr G J Davies

Welsh Water Sewerage: No problems are envisaged with the public sewerage system for domestic foul discharge from this development.

Mr Paul Brown

Community Council Concerns raised in regards to rural aspect, loss of valuable agricultural land and extra traffic would be generated along this inadequate country lane.

Mr M Paddock

Gresford

Policy considerations and constraints

Within Special Landscape Area?	<input checked="" type="checkbox"/>	Within SAC Buffer?	<input type="checkbox"/>
Within Green Barrier?	<input checked="" type="checkbox"/>	Within RAMSAR site?	<input type="checkbox"/>
Affects Conservation Area	<input type="checkbox"/>	Minerals Resource protection or buffer?	<input checked="" type="checkbox"/>
Affects Listed Buildings?	<input type="checkbox"/>	Compatible Land use?	<input type="checkbox"/>
Agricultural land grade 1, 2 3a?	<input checked="" type="checkbox"/>	Brownfield Site?	<input type="checkbox"/>
Within Flood Plain zone C1 or C2?	<input type="checkbox"/>	Settlement Pattern	<input type="checkbox"/>
Impact on public open space?	<input type="checkbox"/>	Wholly Within Settlement Limit	<input type="checkbox"/>
Within Local Wildlife Site?	<input type="checkbox"/>	Partially Within Settlement Limit	<input type="checkbox"/>
Within SSSI?	<input type="checkbox"/>	Outside Settlement Limit	<input type="checkbox"/>
Within SSSI Buffer?	<input type="checkbox"/>	World Heritage Site	<input checked="" type="checkbox"/>
Within SAC?	<input type="checkbox"/>	World Heritage Site Buffer	<input type="checkbox"/>
Footpath on or adjacent to site?	<input type="checkbox"/>	Archaeological Interest	<input type="checkbox"/>
HSE	<input type="checkbox"/>	Canal	<input type="checkbox"/>
Woodlands, or important groups of trees (inc those with TPOs)	<input checked="" type="checkbox"/>	Capacity of infrastructure unable to support additional?	<input type="checkbox"/>

General Reqs

Received


Summary of General Reqs

Objections to the site on the grounds of:

1. Greenfield site outside settlement
2. Vicarage Lane is too narrow, has no pavements and no off road parking and could not accommodate significant increases in additional traffic.
3. Encroachment into Green Barrier and Special Landscape Area.
4. Unattractive and overbearing development that would destroy village character.
5. Impact on wildlife and habitats
6. Form urban sprawl
7. Unsuitable in UDP.
8. Loss of high quality agricultural land.
9. Support methodology and strategy of LDP.

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Housing	Support as potential affordable housing rural exception site or extra care	10. Increased demand on services and schools 11. Green Belt and Special Landscape Area designation should be retained.
Highways	Object: There may be scope to provide access and visibility splays but this site is in an unsustainable location given the lack of footway provision along Vicarage Lane.	
Relevant Planning History		
None.		
Response and Recommendation		
<p>The site is located on the edge of Gresford in a western village and does not accord with the deposit plan strategy of directing development to within defined settlement limits in order to regenerate brownfield land in either Wrexham Town or the Western villages. In addition, the site has trees, ecology and access constraints which would discourage development on the site and as a result is not considered suitable for allocation. There are opportunities for development of affordable housing rural exception sites in the western and rural villages but in this instance there are other sites on the edge of settlement which would be more suitable than this one for such development and the site constraints could not be overcome to allow development in this area. No change to deposit plan.</p>		
Sustainability Appraisal and Habitat Regulation Implications		
<p>Prior to the Deposit Plan this site was appraised using the Council's Sustainability Appraisal Candidate Site Methodology and rejected at stage 1 (not compliant with the Preferred Strategy). The representative has not presented additional information in relation to the appraisal, the onus of proof the site is compliant with the SA/SEA requirements rests with the representative. No information has been supplied with regards to the Habitats Regulations.</p> <p>If this site were to be allocated by the inspector further assessment on the SEA/SA/Habitats would be required.</p>		

Suggested site for development: GRESFORD RD, NEWYIELD HALL VICARAGE LANE GRESFORD	
Settlement: Gresford/Marford	
Current Use: None	
Proposed Use: Extra Care Homes	
Area (Ha): 1.8	
	
Internal Comments	External Comments
Landscape Open countryside, the pattern of trees and overgrown hedgerows within the site are important local landscape features and of high habitat potential. A development pattern allowing for the retention of these features would be difficult to achieve. Recommendation: Discount site!	CCW Mr G J Davies GCN within 500m of site.
Ecology This site has a high ecological value, many mature trees with the potential to support bats and birds cover the site with little opportunity for mitigation on site.	Welsh Water Mr Paul Brown Sewerage: No problems are envisaged with the public sewerage system for domestic foul discharge from this development.
Trees Parkland setting, with many TPO trees, which precludes development as there simply isn't enough space to allow development without losing significant protected trees.	Community Council Mr M Paddock Gresford Valuable mature tree would be removed. Park land close to residential land and no footpaths.
Housing Support as potential affordable housing rural exception site or extra care	
Policy considerations and constraints	
Within Special Landscape Area?	Within SAC Buffer?
Within Green Barrier?	Within RAMSAR site?
Affects Conservation Area	Minerals Resource protection or buffer?
Affects Listed Buildings?	Compatible Land use?
Agricultural land grade 1, 2, 3a?	Brownfield Site?
Within Flood Plain zone C1 or C2?	Settlement Pattern
Impact on public open space?	Wholly Within Settlement Limit
Within Local Wildlife Site?	Partially Within Settlement Limit
Within SSSI?	Outside Settlement Limit
Within SSSI Buffer?	World Heritage Site
Within SAC?	World Heritage Site Buffer
Footpath on or adjacent to site?	Archaeological Interest
HSE	Canal
Woodlands, or important groups of trees (inc those with TPOs)	Capacity of infrastructure unable to support additional?
General Reps Received Summary of General Reps	
10	Objections to the site on the grounds of: 1. Increased volume of traffic on rural lane which has no footpath, off road parking, no street lighting and poor surface from existing high volume of users. 2. Harm village character. 3. Loss of green belt. 4. Lack of need for additional housing. 5. Existing infrastructure under strain. 6. Schools at capacity. 7. Impact on wildlife and habitats. 8. Unsuitable for allocation in UDP. 9. Support methodology and strategy of LDP. 10. Increased demand on services and schools

Highways	Object There may be scope to provide access and visibility splays, but this site is in an unsustainable location given the lack of footway provision along Vicarage Lane.	11. Green Belt and Special Landscape Area designation should be retained.
Relevant Planning History	None.	
Response and Recommendation	The site is located on the edge of Grestford in a western village and does not accord with the deposit plan strategy of directing development to within defined settlement limits in order to regenerate brownfield land in either Wrexham Town or the Western villages. In addition, the site has trees, ecology and access constraints which would discourage development on the site and as a result is not considered suitable for allocation. There are opportunities for development of affordable housing rural exception sites in the western and rural villages but in this instance there are other sites on the edge of settlement which would be more suitable than this one for such development and the site constraints could not be overcome to allow development in this area. No change to deposit plan.	
Sustainability Appraisal and Habitat Regulation Implications	Prior to the Deposit Plan this site was appraised using the Council's Sustainability Appraisal Candidate Site Methodology and rejected at stage 1 (not compliant with the Preferred Strategy). The representative has presented additional information in relation to the appraisal, the onus of proof the site is compliant with the SA/SEA requirements rests with the representative. No information has been supplied with regards to the Habitats Regulations. If this site were to be allocated by the Inspector further assessment on the SEA/SA/Habitats would be required.	

Appendix 3: Extracts from Wrexham Local Development Plan 2013 – 2028 Preferred Strategy - Site Register, February 2016

Wrexham Local Development Plan 2013 – 2028 Candidate Site Register

Site Ref: GRE08CS

Site Address: Land Adjoining Trewythen Hall,
Vicarage Lane, Gresford

Settlement: Gresford/Marford

Community: Gresford

Ward: Gresford East & West

Size Ha: 0.87

Greenfield: No

Brownfield: Yes

Settlement Hierarchy Tiers: 2

With Planning Permission
as of 1st April 2015: N/A

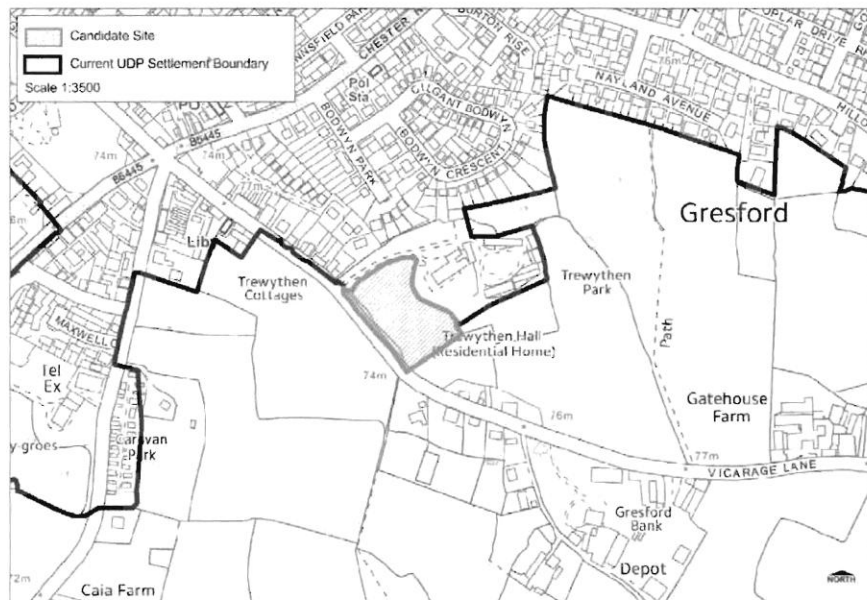
Current Use: Garden

Proposed Use: Residential

Small Sites: No

Large Sites: Yes

Comments: The site complies with the Council's Preferred Strategy, however there are site constraints that are unlikely to be overcome to allow the site to be developed.



Appendix 3 cont.

Wrexham Local Development Plan 2013 – 2028 Candidate Site Register

Site Ref: GRE15CS

With Planning Permission
as of 1st April 2015: N/A

Site Address: Land South of Vicarage Lane and
East of Old Wrexham Road, Gresford

Current Use: Vacant Land

Settlement: Gresford/Marford

Proposed Use: Mixed Use

Community: Gresford

Small Sites: No

Ward: Gresford East & West

Large Sites: Yes

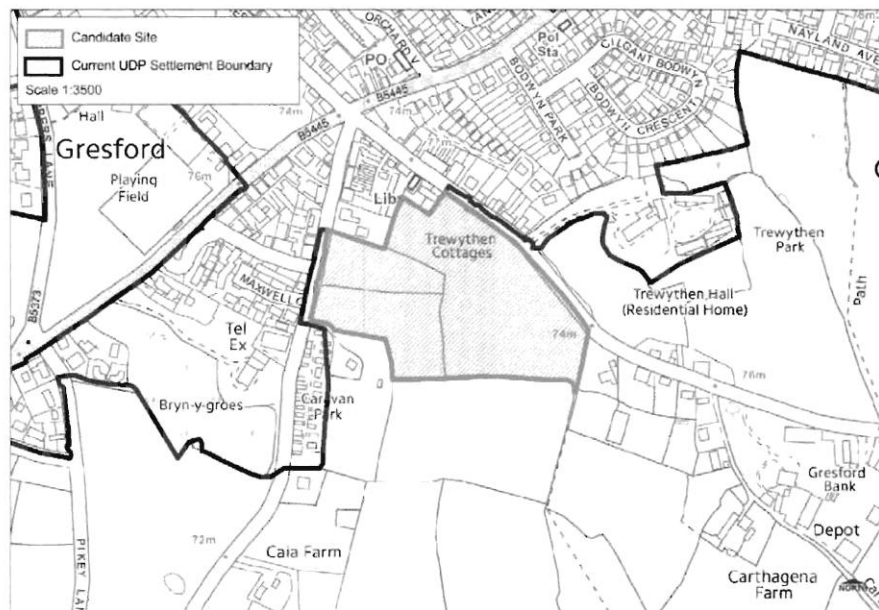
Size Ha: 4.4

Comments: The site complies with the Council's
Preferred Strategy, however there are site constraints
that are unlikely to be overcome to allow the site to be
developed.

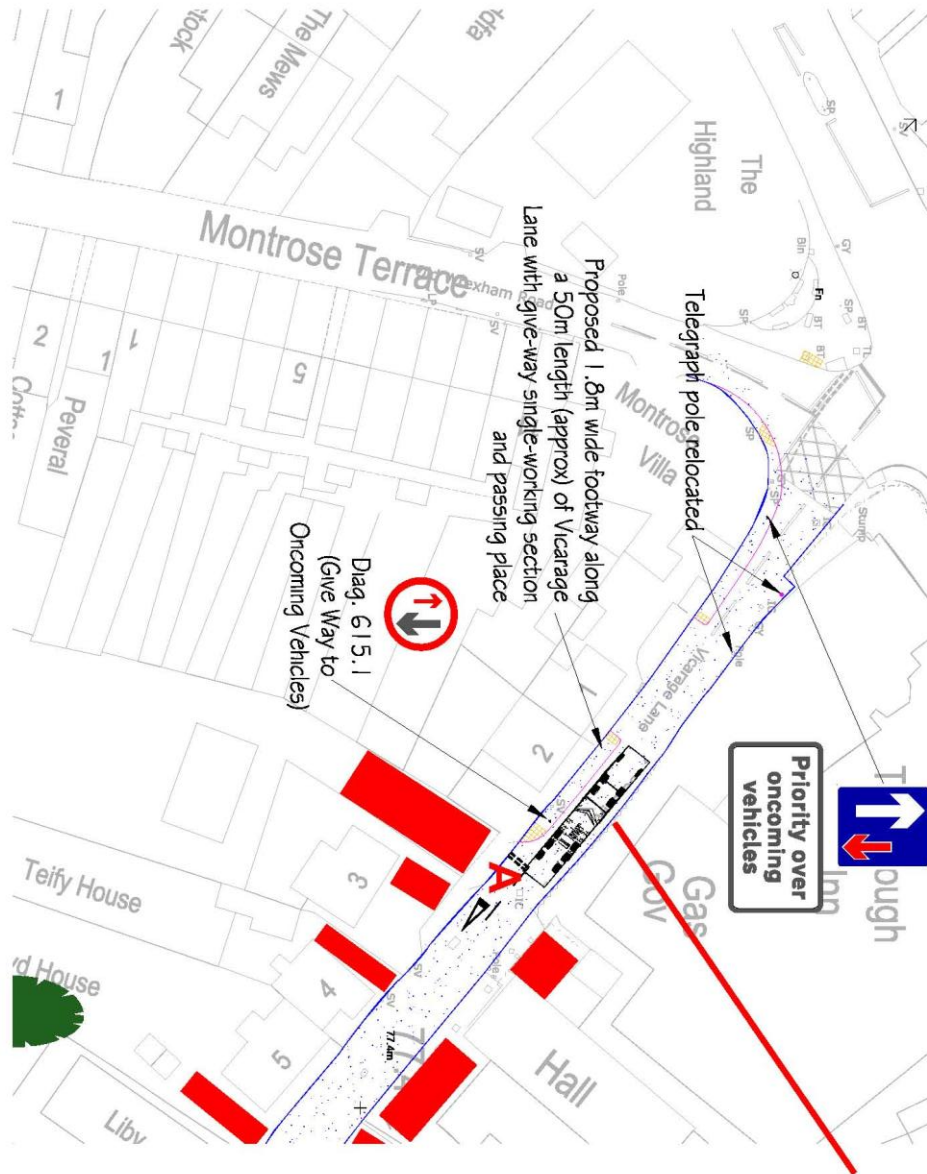
Greenfield: Yes

Brownfield: No

Settlement Hierarchy Tiers: 2



Appendix 4: Westbound HGV movement through traffic mitigation system while traffic lights change from green to red



Tanker is approaching the traffic lights which are on green as the tanker passes the give way at point A so the tanker proceeds towards the lights but they then turn red when the tanker is in the position shown on the drawing to the left.

Appendix 5: Proposed traffic mitigation system and interaction with access for existing dwellings

