



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

Supporting Planning Statement
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1 Introduction

- 1.1 This supporting statement has been prepared by Civitas Planning Limited in support of this application which seeks planning permission for residential development.
- 1.2 The Applicant, Wales & West Housing Association are a registered social landlord who operate across Wales.
- 1.3 The application proposes the construction of 27 no. 1-bed affordable apartments with associated parking and servicing.
- 1.4 The Application Site is subject to an extant permission for residential development.

2 Site Description and Background

- 2.1 The application site extends to 0.16ha and although the site has now been cleared (ref: P/2016/1030) the site was previously occupied by the Ebeneser Chapel.
- 2.2 The application site is triangular in shape and lies on the eastern side of Chester Road, north of the centre of Wrexham. To the north lie numbers 4 & 6 Chester Road, residential properties. To the east is Wrexham Memorial Hall and south the war memorial itself. On the opposite side of Chester Road, west of the Application Site is the Coleg Cambria Iâl campus.
- 2.3 The application site lies within the settlement boundary of Wrexham in an area characterised by mixed use development.
- 2.4 The site is relatively flat with an open frontage to Chester Road (currently fenced) and mature trees along the south-eastern boundary.
- 2.5 The application site was previously occupied by the Ebeneser Chapel, built in 1975 to replace the original Chapel on Queen Street, it was consecrated in January 1976. The Chapel was demolished in 2017.

2.6 The pertinent planning history is as follows:

P/2016/0337

Demolition of former chapel and erection of 23 no. apartments, over four floors, with associated parking, external works and access.

Granted 23/3/2017

P/2016/1030

Demolition Notification

Approved 01/12/2016

P/2021/0313

Variation of condition 01 of planning permission P/2016/0337 to extend time period for commencement of development

Granted 19/08/2024

3 Proposal

- 3.1 This application proposes the construction of 27 no. 1-bed apartments, which will be available to persons on the housing register on a social rented basis, allocated in accordance with the Banding Scheme.
- 3.2 The proposed development consists of a single block of apartments constructed over 4 floors. To the ground floor will be 6 apartments with 7 apartments on each of the other floors; 27 in total. The apartments each consist of bedroom, bathroom and kitchen/living room.
- 3.3 The building will be finished externally in both smooth and textured brick, split faced block/stone cladding and Cedral click cladding. The hipped roof will be finished in dark grey concrete tiles with photovoltaic panels. Dark grey anthracite UPVC window frames are proposed laid out in a regular pattern.
- 3.4 To the rear of the building 9 parking spaces are proposed and an area available for the development of a sub-station. The parking spaces will be accessed via

private drive to the north of the development. To the south of the building an area for bin storage is proposed.

- 3.5 The design allows for an appropriate stand-off from the existing mature tree located at the southern end of the site. The tree will be appropriately protected during the course of construction.
- 3.6 The proposed apartment buildings will be constructed to a high standard, adopting a fabric first approach of highly insulating and sealing the external envelope. The building will have a varied external finish utilising brick textures and cladding board to provide visual interest. Dark grey fascias, soffits, bargeboards and rainwater goods will complement the external finish and use of complimentary cills break up the façade.
- 3.7 The majority of the site will be bounded by the existing brick wall that will be retained. A new brick wall will be installed along the site frontage and railings are proposed in the vicinity of the existing mature trees at the southern end of the site. Paving will be installed around the building to facilitate access and this will.
- 3.8 Soft landscaping in the form of hedgerow planting is proposed to western elevation, fronting the road, while to the rear of the site hedgerow and tree planting is proposed to the boundary. Ornamental planting areas are proposed at the southern end of the building and wildflower/meadow grassland is proposed along the eastern boundary of the site.
- 3.9 The soft landscaping will be managed by the maintenance team from Wales and West Housing who, as landlord, will maintain the communal areas of the site.

4 Legislative Context

- 4.1 Planning law requires that applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

- 4.2 The Wrexham Local Development Plan was adopted by the Council in December 2023. Also pertinent to this application is Future Wales: The National Plan 2040, Planning Policy Wales (Edition 12) and the relevant Technical Advice Notes. There are also a number of Local Planning Guidance Notes that have been referenced in developing this proposal.

Principle of Development

- 4.3 Future Wales: The National Plan 2040 Policy 7 sets out the national strategic approach to delivering affordable housing and that the focus is on driving increased provision. In principle Future Wales supports the delivery a scheme that seeks to deliver only affordable housing provision. Likewise Planning Policy Wales (Edition 12) supports affordable housing and the development of previously development land.
- 4.4 Para.3.55 of PPW states 'in settlements, such land [previously developed land] should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome'.
- 4.5 The Application Site lies within the Wrexham settlement boundary and in accordance with Local Development Plan Policy SPS2: Location of Development, new development will be directed to the defined settlement limits as identified on the Proposal Map. This is consistent with PPW which at para.4.2.17 goes on to state that 'maximising the use of suitable previously developed and/or underutilised land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites'.
- 4.6 The Application Site also lies within the Wrexham City Centre Masterplan Area and the proposed development of this site will support the regeneration, renewal and enhancement of Wrexham City centre consistent with policy SP7 and R2 of the development plan. Policy R2 also requires that development proposals are compatible with the with the Masterplan vision, objective and aims. Specifically, the proposed development responds to objective 5:

Provide opportunities for town centre living

Provide a range of attractive housing choices within the town centre through the re-use of vacant or underused land and the conversion of vacant office space above retail units.

- 4.7 This application proposes the redevelopment of a previously developed site and responds directly to an existing identified need for this form of affordable housing.
- 4.8 PPW states at para.4.2.25 that a community's need for affordable housing is a material planning consideration which must be taken into out in determining relevant planning applications.
- 4.9 LDP Policy H2 supports the provision of affordable housing on windfall sites. This application is policy compliant as it proposes solely affordable provision. 27x 1-bed apartments are proposed as a significant proportion of persons on the on the Housing Register are in need of a 1-bed property and a preference for a property within this estate office area.
- 4.10 The modest contribution to social housing stock is also supported by LDP policy SP13 which seeks to address detriments to health; access to good quality housing being an important component of general health and wellbeing.
- 4.11 LDP Policy SP1 requires that new development will be expected to maximise affordable housing delivery where there is an identified need, which this proposal does. The proposed development, at 27 units, far exceeds a 30 dwellings per hectare density and represents a sustainable use of this previously development land and is compliant with the City Centre Masterplan which encourages higher density development and high-rise development in and adjacent to the town centre where appropriate.
- 4.12 The proposed development of this site for affordable housing is therefore acceptable in principle and indeed the site has extant permission for residential development; this fallback position being a material consideration.
- 4.13 We are firmly of the view however that the development now proposed carries significant benefits over and above the development granted by permission ref: P/2021/0313. The timing of the grant of permission ref: P/2021/0313 and the

parent permission (ref: P/2016/0337) mean that the scheme approved did not include any on-site affordable housing provision and rather a contribution was to be made, secured via the associated Section 106 agreement. While that monetary contribution would no doubt be put to good use in the ongoing delivery of affordable housing to meet unmet need, the extant permission didn't make 100% affordable provision to meet an existing unmet need.

- 4.14 The proposed scheme will deliver 27 units to eligible persons who are currently in housing need. The delivery and management of this housing will be undertaken by an established registered social landlord with significant operating experience. It is fully expected that the affordable nature of these properties will be secured in perpetuity via an appropriately worded legal agreement and thus the properties will remain affordable and continue contributing to meeting housing need into the future.

Design Principles

- 4.15 LDP policy SP12, Design Principle and Masterplanning Framework sets out the expectation that all developments must demonstrate how they have taken account of local characteristics in order to create high quality, sustainably designed places.
- 4.16 As set out within the accompanying Design and Access Statement the application site lies within a well-established urban area and detailed site analysis has informed the development proposal.
- 4.17 In accordance with LDP policy DM1 the proposed development by virtue of its siting layout, scale, height, design, density, use of materials and landscaping enhances the character of the area and the visual appearance of the site. The proposed development will not result in unacceptable impacts on amenity and as set out in the Design and Access Statement provides a safe and accessible space.
- 4.18 The proposed development will be constructed to a high standard and through adoption of modern methods of construction will represent an energy efficient development including on-site generation through the use of solar panels.

- 4.19 The development is in an area with good walking, cycling and public transport links and an appropriate and informed level of parking provision is made on site.
- 4.20 Appropriate consideration has also been given to designing out crime and reference had to Local Planning Guidance Note 24. The development allows for natural community surveillance and it will be ensured that parking and communal spaces are well lit. The properties will also meet Secured by Design standards.
- 4.21 In comparison to the development permitted under application ref: P/2021/0313 it is considered that the 27 apartments now proposed are far less imposing as the development doesn't extend to 5 floors, isn't positioned as close to the boundary with the adjoining dwellings, nor does the development extend along the rear boundary of the site like that approved under P/2021/0313. The proposed development is more compact and gives careful consideration to the space around the building and how this is treated.
- 4.22 The proposed development is therefore compliant with the policies of the Development Plan and advice provided within TAN 12 and national planning policy in this regard.
- 4.23 The Application Site lies in relatively close proximity to a Conservation Area, west of the site. There is however no direct intervisibility between the conservation area to the west and the application because of the university buildings that lie between the two. It is considered that the proposed design does not therefore compromise the preservation of the conservation area and is compliant with policy SP15.
- Residential Privacy and Amenity*
- 4.24 LDP policy DM1(B) requires that development proposals do not have an unacceptable effect on the amenity of the occupiers of nearby property/land and that appropriate provision is made for the amenity of the occupiers of the development itself.
- 4.25 Local Planning Guidance Note 21 sets out space standards for residential development requiring 22m between habitable room windows that directly face

one another and at least 12 metres between a habitable room window and blank elevation.

- 4.26 The relationship between the proposed development and no.4 Chester Road is particularly key as the closest neighbouring development to the Application Site. There are no windows to habitable rooms within the northern elevation of the proposed development and the distance between this elevation and habitable rooms in the southern elevation of the two storey portion of no. 4 Chester Road well exceeds 12m in distance.
- 4.27 The distance between the proposed development and the collage buildings west of the application site also far exceeds the advised separation distances in Note 21.
- 4.28 Consideration has also been given to the overbearing impact of development on this site on the neighbouring dwelling and the difference in scale between a single residential dwelling and neighbouring apartment development. Material to the assessment of this aspect of the proposal is the extant planning permission. While the extant permission allows for three storey development adjacent 4 Chester Road and this application proposes 4 storey development the height of the development overall is less, and the development is set further away from the shared boundary. The proposed development is also concentrated along the western boundary with the road, as opposed the extant permission that allows for a 'v' shaped building that would affect a greater proportion of the shared boundary with the adjoining residential dwelling.
- 4.29 Within the proposed development itself the design ensures that each property is private and that the residents will experience an appropriate level of residential amenity. The proposal is therefore compliant with LDP policy DM1(B).

Transport and Accessibility

- 4.30 LDP policy SP11 restricts development that would have an unacceptable impact on the safe and efficient operation of the transport network.

- 4.31 The application proposes the site is accessed from Chester Road at the northern end of the site where there is an existing dropped curb. This access arrangement reflects that approved by the extant permission.
- 4.32 The proposed access drive extends from the highway in an easterly direction and wraps around the rear of the building providing access to 9 no. car parking spaces. The access will be gated and the gates set back within the site allowing vehicles to leave the highway and not impede traffic.
- 4.33 The point of access is designed so as to have sufficient visibility to operate as a safe point of access to and from the site and there is sufficient space within the site to allow vehicles to turn and leave in forward gear.
- 4.34 The existing pedestrian footway to the front of the site will remain unaltered.
- 4.35 The application proposes secure cycle storage at ground floor level within the development.
- 4.36 This application does not however propose a policy compliant level of parking provision. There is good reason for this. The Applicant is a well-established housing association, and it is known from their significant operating experience that parking provision in developments of this type in urban settings is simply not necessary.
- 4.37 The occupants of these type of affordable units are unlikely to all own cars and so it is considered that the provision of 9 spaces on site is sufficient to meet the needs of the occupants of these properties and not result in any unacceptable highways impacts.
- 4.38 The application is supported by a Transport Statement which expands on this point further and establishes that TRICS data supports the operational knowledge of the Housing Association and census data that demonstrates car ownership levels amongst occupants of social rented housing is significantly lower than across all households in Wrexham.
- 4.39 The Transport Statement sets out the assessment of the proposal and concludes that the proposal will not compromise the safe, effective and efficient use of the highway network. The proposed development is therefore in

accordance with the requirements of LDP policy T1 and through the existing footway to the front of the site and cycle storage within the site this enables people to choose active forms of travel in accordance with policy T2.

Biodiversity and Nature Conservation

- 4.40 LDP policy SP14: Natural Environment states that development will only be permitted where it seeks to protect, conserve and enhance the natural environment.
- 4.41 The Application Site is previously developed land and albeit the chapel has now been demolished and the site cleared of the building materials the majority of the site is laid to hardstanding.
- 4.42 The site has been subject to Preliminary Ecological Assessment and found to have limited ecological value and to not provide suitable habitat for any protected or notable species beyond birds and hedgehogs. There are however two high quality mature trees at the southern end of the Application Site and a number of medium and low quality trees along the eastern boundary of the site.
- 4.43 These trees have been the subject of an arboricultural impact assessment and it is proposed that the series of trees immediately adjacent the eastern edge of the site will be removed (as was also approved by the extant permission) and that the three remaining trees will be appropriately protected during construction works and retained as part of the proposed development.
- 4.44 The application proposes tree planting to mitigate the effect of the proposed removal of trees on the eastern boundary. It is proposed to plant 4 no. rowan trees as well as installing native hedgerow species.
- 4.45 In addition to planting the application also proposes the installation of 3 no. bat boxes at the southern end of the site and 2 no. swift bricks in the northern elevation. It is considered that these steps will successfully achieve the incorporation of green infrastructure into the proposal and deliver on-site biodiversity gain through higher quality habitats and improved connectivity.
- 4.46 The proposed development is compliant with national planning policy and LDP policies SP19, NE1 and NE3.

Drainage

- 4.47 The proposal is supported by a drainage strategy that proposes foul connection to the existing sewer in the highway fronting the site. This is reflective of the existing permission and pre-application discussions with DCWW has not raised any concerns with this proposed arrangement.
- 4.48 In regards surface water, a soakaway is proposed to the rear of the site, beneath the proposed parking/turning area and surface water will be managed wholly within the site. The development of 27 no. apartment is greater than the number proposed by the extant permission but as these units are only 1-bed dwellings the occupation capacity is far less than the extant permission would allow. The impact of the proposal on phosphorous discharges into the SAC catchment, and the capacity of the Five Fords Waste Water Treatment Works to deal with this will therefore be less than if the extant permission were to be implement. This is a material planning consideration and the Applicant is therefore of the view that the proposed development is complaint development plan policy NE 6 as this proposed development would not result in adverse effects over and above the impact of the development already permitted.

Open Space Provisions

- 4.49 LDP policy CF2 states that developments of 10 or more dwellings must include provision for public open space. On-site provision is the Council's preference but the LDP recognises that this isn't always feasible or achievable, and thus provision and/or improvement of existing local provision off-site will be considered and secured through planning obligation and commuted sum.
- 4.50 The provision of public-open space isn't feasible or achievable on this site the Applicant is therefore accepting of the requirement to contribute to the improvement of existing local provision.

Education Provision

- 4.51 LDP policy SP5 identifies that planning obligations will be sought to mitigate the impacts of development and that this may include sums for education provision. Reference to the Local Planning Guidance Note 27 advises that

contributions will not be sought for 1-bed properties and the proposal is thus policy compliant in this regard.

Sustainability

- 4.52 In regards climate change and local plan policy SP18 the proposed development has been designed with a fabric first approach of highly insulating the sealing the external envelope to improve environmental sustainability and thermal efficiency.
- 4.53 This construction approach will be supplemented through on-site energy generation through solar photovoltaic panels and use of appropriately specified appliances internally to reduce water consumption.
- 4.54 As se out above the occupants of these properties are statistically less likely to be reliant on private motor vehicles but the development also encourages more sustainable modes of transport through appropriate provision of secure cycle storage and through safe access to the existing network of pavements that serve the local area and facilitate access on foot.

5 Conclusion

- 5.1 This Application proposes the construction of 27 no. 1-bed affordable dwellings. The proposal is a well-designed response to the development site and represents a good opportunity to redevelop a site that has not been in active use for some time.
- 5.2 The Application is supported by the appropriate assessments and reports which have informed and the development of this proposal which has also been led by the policies of the development plan, national planning policy and the available guidance notes.
- 5.3 The proposed development is complaint with planning policy, with the exception of parking provision, and will make a modest contribution to the

affordable housing stock in the borough. The evidence demonstrates that there is a need for such dwellings in the locality.

- 5.4 It is acknowledged that there is some conflict with policy in respect of parking provision however material to the consideration of this is the evidence about demand for parking in the social housing sector, plus the significant experience of the applicant as a housing association managing these types of properties.
- 5.5 For the reasons set out within this statement is therefore respectfully requested that planning permission be granted.