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jll.com

# *Planning Statement*

***Former Army Reserve Centre, Wales and West Housing Association,  
Marine Road, Prestatyn***

# Contents

1.	Introduction	3
2.	Site Location and Description	5
3.	Planning History	7
4.	Proposed Development	8
5.	Pre Application Advice	12
6.	Planning Policy Context	13
7.	Planning Considerations	18
8.	Conclusions	23

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# 1. Introduction

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## Introduction

- 1.1. JLL has been instructed by Wales and West Housing Association to prepare this Planning Statement in support of an application seeking approval of full planning permission for the demolition of the former Army Reserve Centre buildings and the development of 47 new residential units comprising a mix of dwellings and apartments located at Marine Road, Prestatyn
- 1.2. The description of development is as follows:  
**‘Proposed demolition and redevelopment for residential development (Use Class C3) at Former Army Reserve, Marine Road, Prestatyn’**
- 1.3. In addition to this Statement, the planning application is accompanied by the following supporting documents:
  - Planning Application Form and Certificates (Prepared by JLL)
  - Statutory Planning Application Fee
  - Planning Drawings (Prepared by Creu Architects)
    - CREU-C523-001-C-LOCATION PLAN
    - CREU-C523-002-C-EXISTING SITE
    - CREU-C523-006-G-PROPOSED SITE
    - CREU-C523-007-E-PROPOSED SITE NORTH EAST AXO
    - CREU-C523-008-D-PROPOSED SITE SOUTH WEST AXO
    - CREU-C523-009-E-PROPOSED SITE SECTIONS 01
    - CREU-C523-050-H-APARTMENT PLANS LEVEL 00 & 01
    - CREU-C523-051-G-APARTMENT PLANS LEVEL 02 & ROOF
    - CREU-C523-052-F-APARTMENT ELEVATIONS
    - CREU-C523-053-D-APARTMENT ELEVATIONS
    - CREU-C523-060-E-TERRACE A PROPOSED 2B4P
    - CREU-C523-065-D-TERRACE B PROPOSED 2B4P
    - CREU-C523-070-E-SEMI A PROPOSED 3B5P
    - CREU-C523-075-D-SEMI B PROPOSED 2B4P
    - CREU-C523-080-E-SEMI C PROPOSED 1B2P WALKUP APARTMENT
  - Landscape Drawing and Schedule (Prepared by Above Zero)

- 134.01.01A- TA Centre, Marine Road\_Landscape GA
- 134.01.02A- TA Centre, Marine Road\_Planting Schedules
- Design and Access Statement (Prepared by Creu Architects)
- Landscape Drawing and Tree Planting Schedule (Prepared by Above Zero)
- Flood Consequences Assessment (Prepared by Weetwood)
- Preliminary Ecological Assessment (Prepared by Enfys Ecology)
- Transport Assessment (Prepared by Focus Transport Planning)
- Green Infrastructure Statement (Prepared by Wales and West Housing Association)
- Community and Linguistics Impact Assessment (Prepared by Wales and West Housing Association)

## Structure

1.4. This Planning Statement identifies and addresses the issues relevant to the consideration of the application submission, as follows:

- Site Location and Description – describes the physical characteristics of the planning application site and its immediate surroundings;
- Planning History of the Site – identifies the relevant planning history for the site;
- Proposed Development – provides a description of the proposed development;
- Pre Application- To be completed following the PAC process
- Planning Policy Context – describes the planning policies which are relevant to the proposed development;
- Planning Considerations – Provides an assessment of the proposed development against the policies, guidelines and other material planning considerations ; and
- Conclusions - sets out the conclusions of this statement.

## 2. Site Location and Description

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- 2.1. The application site is currently vacant, having formerly operated as the Army Reserve Centre, Prestatyn. It is understood the site closed in 2018. The site is previously developed and measures approximately 0.8ha. It is located to the north of Marine Road at the junction with Bastion Road, Prestatyn.
- 2.2. The existing building on the site comprises a two storey former Army Reserve Centre which fronts Marine Road along the southern boundary and wraps around the western boundary along Bastion Road.
- 2.3. The building has a white render finish on the front exterior elevation at the ground floor level. The second floor is a mixture of red brick and red engineering brick. The original window frames are still in situ, however large portions of the glass have been damaged and are boarded up.
- 2.4. The part of the building that stretches along the western boundary was previously used as office space and a workshop for army vehicles. There are garage doors along the eastern elevation of the building which provides access to the workshop area of the building. There is also a steel framed open fronted storage canopy along the eastern elevation which was used as an extension to the smaller workshop areas.
- 2.5. The part of the building along the southern boundary was used for army employee accommodation and amenity space including offices, kitchens, bars and social space.
- 2.6. Along the northern boundary of the site is a steel framed open fronted storage canopy which was previously used for vehicle storage and repair.
- 2.7. The rest of the site consists of hardstanding for the storage of vehicles, with secure fencing on all perimeters of the site.
- 2.8. Vehicular and pedestrian access to the site is currently taken from Marine Road.
- 2.9. The site sits immediately to the west of Prestatyn Fire Station. To the north of the site is the Prestatyn Gutter and beyond are residential dwellings along Highbury Avenue. Directly to the south of the site, along Marine Road, is a petrol station with retail kiosk and The Suhail Tandoori restaurant. Directly to the east of the site are a small number of residential properties on Marine Road. There are also two residential properties directly on the western boundary of the site on Bastion Road.



## Wider Area

- 2.10. The wider area to the north is predominantly made up of residential dwellings which are a mixture of two storey homes and bungalows. In addition is the applicant's established Nant Y Mor care home which lies 160m east of the site on Marine Road.
- 2.11. There are also three caravan parks approximately 0.5km from the site, including Pontins Holiday Park.
- 2.12. Prestatyn Beach lies approximately 0.8km north of the site and Bastion Gardens is approximately 0.4km north of the site.
- 2.13. At the beach front is Nova, one of North East Wales' biggest indoor visitor attractions which comprises a fitness suite, indoor adventure soft play, a café, restaurant, multi-purpose studios/functions rooms and a swimming pool and small splash pool.
- 2.14. Parc Prestatyn Shopping Park lies approximately 0.3km south of the site which comprises a Marks and Spencer and Tesco Superstore. Other retailers include TKMaxx, Sports Direct and Clarks. There are also various cafes, bars and restaurants within the area.
- 2.15. The nearest railway station is Prestatyn, situated approximately 0.3km south of the site providing services to Holyhead, Birmingham International, Manchester Airport, Cardiff and Llandudno.
- 2.16. The nearest bus stop is located 99m to the south of the site on Bastion Road providing services to Flint, Rhyl and Holywell.

### 3. Planning History

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- 3.1. A planning history search has been undertaken via a desktop search of Denbighshire County Council's public access.
- 3.2. No relevant planning history has been identified at the application site.

## 4. Proposed Development

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### Proposal

- 4.1. The proposed development is described on the application form as follows:  
***‘Proposed demolition and redevelopment for residential development (Use Class C3) at Former Army Reserve, Marine Road, Prestatyn’***
- 4.2. The proposal will be delivered by Wales and West Housing Association, an established registered provider of affordable homes in 13 local authorities across Wales.
- 4.3. The proposal will deliver 100% affordable homes as social rented accommodation.
- 4.4. The scheme will comprise:
- 26 x 1B2P apartment block,
  - 8 x 1B2P walk up apartments
  - 4 x 3B5P semi-detached houses
  - 2 x 2B4P semi-detached houses
  - 7 x 2B4P terraced houses
  - 50 x car parking spaces
  - 2 x Accessible parking spaces
  - Associated landscaping
- 4.5. The apartment block will be split over three storeys. On the ground floor there are eight one-bedroom apartments proposed along with a plant area and two stairwells. The first floor will comprise nine one-bedroom apartments and the second floor will comprise another nine one-bedroom apartments.
- 4.6. The two sets of walk-up apartments will be split over two storeys and comprise two apartments each to the ground floor and two apartments each on the first floor.
- 4.7. The four semi-detached houses are proposed over two storeys and comprise three bedrooms which are proposed to have one, one-person bedroom and two, two person bedrooms.
- 4.8. The two final semi-detached houses are proposed over two storeys and comprise two bedrooms which are proposed to have two, two person bedrooms.
- 4.9. Finally, there are seven terraced houses proposed over two storeys and comprise two, two person bedrooms.

### Site Layout

- 4.10. A detailed site plan has been prepared, outlining the layout of the proposed development.

- 4.11. The 26-apartment block is proposed to south west of the site, situated on the corner of the site in a prominent position along Marine Road, effectively in a similar footprint to the existing Army Reserve building.
- 4.12. There are two blocks of four walk up apartments proposed at the site. One block of four is proposed to the north west of the site and other block of four apartments is proposed to the north east of the site.
- 4.13. The six semi-detached dwellings are proposed to the north of the site and the seven terraced dwellings are proposed to south of the site.

**The layout of the 26-apartment block would be as follows:**

Ground floor

- 8 x one- bedroom apartments
- 1 x plant room

First floor

- 9 x one-bedroom apartments

Second floor

- 9 x one-bedroom apartments

**The layout of the walk-up apartments would be as follows:**

Ground floor

2 x one bedroom apartment

First Floor:

2 x one bedroom apartment

**The layout of the semi detached houses would be as follows:**

Ground floor

1 x kitchen area  
1 x lounge area  
1 x downstairs w/c

First Floor

2 x bedrooms  
1 x bathroom

**The layout of the terraced houses would be as follows:**

Ground floor

- 1 x kitchen area
- 1 x lounge area
- 1 x downstairs w/c

#### First Floor

- 2 x bedrooms
- 1 x bathroom

- 4.14. A total of 50 car parking spaces are proposed at the site which include two disabled parking spaces. The car parking spaces are proposed to sit in the middle of the site, in front of the dwellings and apartments.
- 4.15. A bike store is proposed on the ground floor of the apartment block and all of the proposed houses will include secure by design compliant sheds with space for a bicycle. The walk-up apartments will also include a bike rack, the location of which is to be decided during the full planning application stage.
- 4.16. A bin store is proposed to the east of the site, to the north of the large apartment block.
- 4.17. Pedestrian and vehicular access is proposed along the southern boundary of the site off Marine Road. A pedestrian route is also proposed at the western perimeter of the site

## Landscaping

- 4.18. The landscaping scheme incorporates a diverse mix of native and ornamental plants. The site perimeter features native hedgerow planting, with approximately 192 linear meters proposed along various boundaries.
- 4.19. There are several tree species that have been proposed as well as areas of wildflower meadow, particularly in the northern part of the site, complemented by spring bulb plantings.
- 4.20. Amenity grass areas are incorporated throughout, especially near building frontages. There is a variety of species of ornamental plants and hedges that have been proposed. The scheme also integrates sustainable drainage features, with a SuDS land depression area designated for wildflower growth and natural plant colonisation in the north east corner of the site
- 4.21. Hard landscaping elements include various paving types, parking areas, patios, and timber knee railing with warning signage.

## Housing Standards

- 4.22. The proposed scheme has been designed to meet and largely exceed the housing standards in Wales, applying the Lifetime Home Standards, incorporating guidelines from local and national planning policy which tie in with the Welsh Development Quality Requirements (WDQR), Manual for Streets, and the Equality Act. This comprehensive approach ensures a well considered layout that prioritises accessibility, inclusivity and sustainability, setting a benchmark for future residential developments within Denbighshire.

- 4.23. The proposed development fully adheres to Appendix B of the WDQR with regard to minimum floor areas for affordable housing. The 26 apartments in the large apartment block range between 51sqm and 53sqm. Though this is below the minimum requirement by 2%, they sit within the acceptable buffer of 5%, and the quality of the apartments proposed have not been compromised in line with the guidance in the WDQR.
- 8 x 1B2P walk up apartments
  - 4 x 3B5P semi-detached houses
  - 2 x 2B4P semi-detached houses
  - 7 x 2B4P terraced houses
- 4.24. The eight 1B2P walk up apartments range between are 50.6sqm and 54sqm. Though the 50.6sqm apartments are less than 1% below the minimum requirements, they sit within the acceptable buffer of 5%, and the quality of the apartments proposed have not been compromised in line with the guidance in the WDQR.
- 4.25. The four, 3B5P semi detached houses have a floor area of 93sqm. Though this is less than 1% below the minimum requirements, they sit within the acceptable buffer of 5%, and the quality of the apartments proposed have not been compromised in line with the guidance in the WDQR.
- 4.26. The two 2B4P semi detached houses have a floor area of 85sqm meaning the floor area is 1.7% more than is required by the guidance set out in the WDQR.
- 4.27. The two 2B4P terraced houses have a floor area of 85sqm meaning the floor area is 1.7% more than is required by the guidance set out in the WDQR.

## Planning Wales Act and Wellbeing Future Generations Act

- 4.28. It should be noted that more recently, the Planning (Wales) Act requires a development to be sustainable, with this requirement being in accordance with the Wellbeing of Future Generations Act 2015, the main objective of which is to ensure *'that the land development contributes to the economic, social, environmental and cultural wellbeing of Wales.'*
- 4.29. The Wellbeing of Future Generations Act, defines 'Sustainable Development' as follows 'the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals', it is considered that the proposed scheme adopts the principles of sustainable development.

## 5. Pre Application Advice

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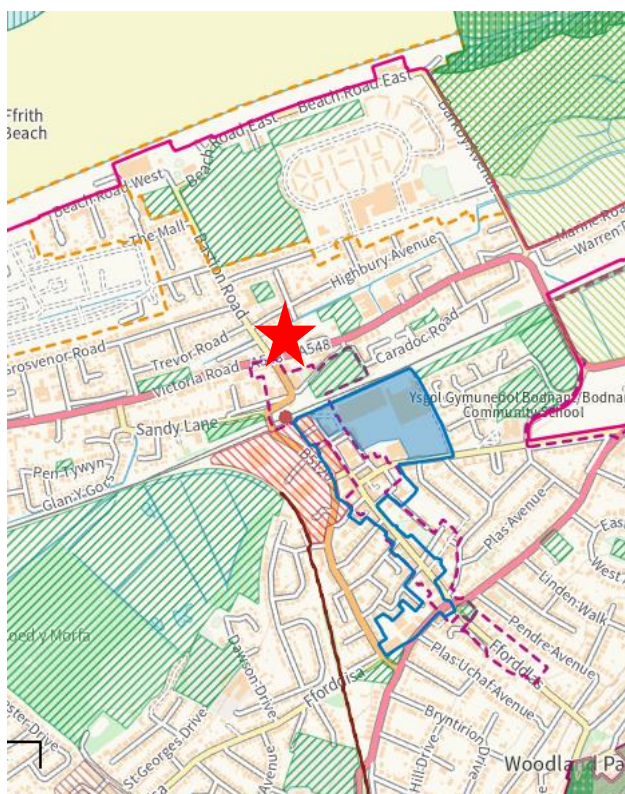
To be completed following the PAC process

## 6. Planning Policy Context

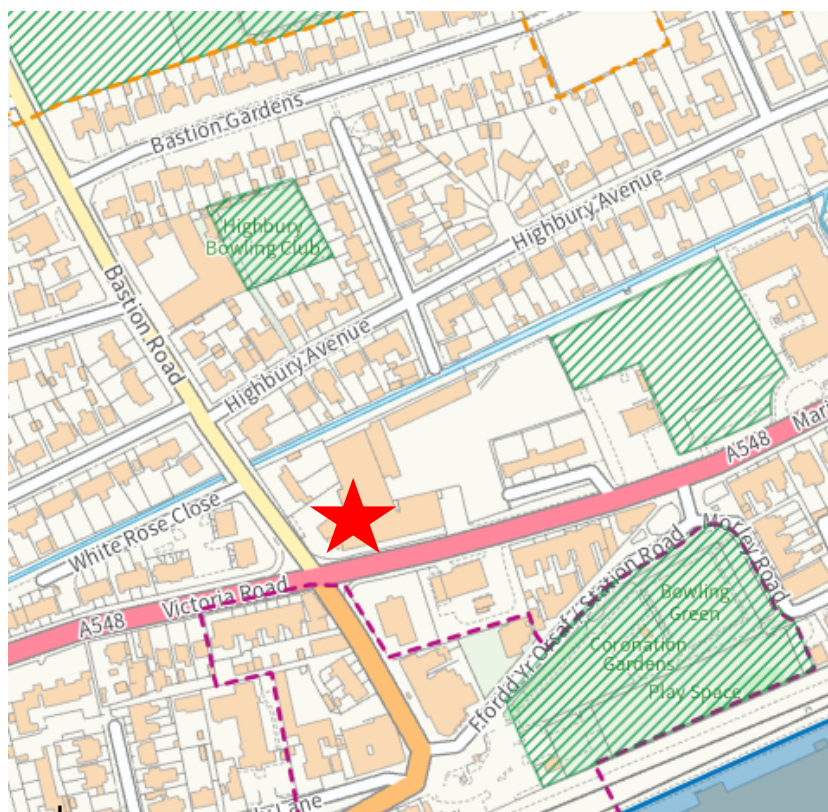
- 6.1. When determining a planning application, the relevant authority (in this case Denbighshire County Council) as the Local Planning Authority will be under statutory obligation, as imposed by Section 38(6) of the Planning and Compulsory Purchase Act 2004 to make their determination in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2. The current Denbighshire Local Development Plan 2006-2021 was adopted in June 2013. The plan is currently under review and is at the Preferred Strategy stage in its progress. The last consultation on the Preferred Strategy was between 8<sup>th</sup> July 2019 and 30<sup>th</sup> August 2019. The strategy was approved by Council on 9<sup>th</sup> May 2023.
- 6.3. The Deposit Plan is awaited.
- 6.4. The adopted LDP is now time-expired, therefore the weight to be afforded to the local policies will depend on the degree of consistency of the LDP in line with Planning Policy Wales (PPW) (July 2024)
- 6.5. The Planning Wales Act and Wellbeing of Future Generations (Wales) Act 2015 are also recognised as part of this proposal.

### Local Planning Policy

- 6.6. As identified in the local plan polices map, the site lies within the Prestatyn Development Boundary and is not allocated for a specific use.



RD1 - Development Boundary



- 6.7. The below policies are considered relevant to the proposed development.
- 6.8. **Policy BSC 1- Growth Strategy for Denbighshire** sets out that *'new housing within the County will be required to meet the needs of local communities and to meet projected population changes... Developers will be expected to provide a range of house sizes, types and tenure to reflect local need and demand and the results of the Local Housing Market Assessment.'*
- 6.9. **Policy BSC 2- Brownfield Development Priority** sets out that proposals in the Lower Growth Towns will be directed towards previously developed land, except where greenfield land is allocated for development in the Plan.
- 6.10. **Policy BSC 5- Affordable Housing** sets out that the affordable housing policy targets 2,250-3,000 homes over the plan period, requiring a minimum 10% affordable housing for developments of 3+ units, with on-site provision for 10+ units and financial contributions for smaller developments. This percentage increases to 30% if sale prices rise 10% above 2009 levels, with additional requirements if prices rise 20%. Specific policies mandate all homes to be affordable for local needs. The actual provision is determined by the Affordable Housing Supplementary Planning Guidance, and 100% affordable housing sites are limited to 10 units or less to maintain mixed communities.
- 6.11. **Policy BSC 11- Recreation and Open Space** sets out that *'Existing recreation, public open space, allotments and amenity greenspace will be protected and where possible enhanced. Development that would result in the loss of public or private land with recreational and/or amenity value will only be permitted where alternative outdoor provision of equivalent or greater community benefit is provided.'*

- *The County minimum standard of 2.4 hectares per 1,000 population will be applied to all development sites.*
- *Open space should always be provided on site. Commuted sums will only be acceptable where it is demonstrated that development would not be financially viable should the full requirement for open space be provided on site or where it is impractical to provide the full requirement for open space on site.*
- *Where there is no identified shortfall of open space in the local area the Council will, where appropriate, expect developers to make a financial contribution by means of a commuted sum to mitigate the impact of increased usage on the existing open space and equipment in the area.'*

6.12. **Policy PSE 1- North Wales Coast Strategic Regeneration Area** states that 'In the North Wales Coast Strategic Regeneration Area the Council will support proposals which:

- *retain and develop a mix of employment generating uses in town centres; or*
- *provide new family residential accommodation; or*
- *enable the retention, enhancement and development of tourism related facilities; or*
- *address existing problems of deprivation in a manner which is consistent with the principles of sustainable development.*

6.13. **Policy ASA 3- Parking Standards** explains that '*Development proposals, including changes of use, will be expected to provide appropriate parking spaces for cars and bicycles. If the use of a property or premises requires parking infrastructure for mobility impaired people, these facilities will be taken into account when determining the amount of parking space required. Consideration will be given to the following circumstances (where they apply) in determining parking provision:*

- *The site is located within a high-densely populated area;*
- *Access to and availability of public transport is secured;*
- *Parking is available within reasonable distance of the site;*
- *Alternative forms of transport are available in the area*

6.14. **Policy RD1 Sustainable Development & Good Standard Design** sets out that development in the development boundary will be supported providing that proposal meet a number of criteria including:

- Respecting the site and surrounds
- Makes the most of efficient land (minimum 25 dwellings per hectare)
- Protects and where possible enhances the local natural and historic environment
- Does not unacceptably affect prominent public views into or out of or across any settlement or are of open countryside
- Incorporates existing landscape or other features
- Does not negatively impact the amenity of local residents, other land and property users or characteristics of the locality.
- Provides safe and convenient access for disabled people, pedestrians, cyclists, vehicles and emergency vehicles.
- Does not have an unacceptable impact on the local highway network

- Does not prejudice land or buildings safeguarded for other uses
  - Satisfies physical or natural environmental considerations relating to land stability, drainage and liability to flooding, water supply and water abstraction from natural watercourse
  - Takes account of personal and community safety
  - Incorporates sustainable landscaping measures
  - Has regard to the generation, treatment and disposal of waste
- 6.15. **Policy RD5-The Welsh Language and the Social and Cultural Fabric of Communities** explains that to be able to make an informed decision on applications that may have an effect on the future of the Welsh language within communities, applications will usually be expected to submit a:
- Community Linguistic Statement
  - More detailed assessment in the form of a 'Community and Linguistic Impact Assessment' in all settlements where developments are on a larger scale comprising proposals such as 20 residential units or more.
- 6.16. **Policy VOE 6- Water Management** sets out that all development will be required to incorporate water conservation measures, where practicable. Major development proposals should be accompanied by a Water Conservation Statement.

## Planning Policies for Wales

- 6.17. Chapter 2 People and Places paragraph 2.8 explains that proposals and decisions must seek to promote sustainable development and support the well being of people and communities across Wales.
- 6.18. Chapter 3 Strategic and Spatial Choices paragraph 3.5 sets out that development should place people at the heart of the design process, acknowledge diversity and difference, offer choice where a single design solution cannot accommodate all users, provide for flexibility in use and provide buildings and environments that are convenient and enjoyable to use for everyone.
- 6.19. Chapter 4 Active and Social Places paragraph 4.2.1 sets out that planning authorities must understand all aspects of the housing market in their areas which will allow them to develop evidence based market and affordable housing policies in their development plans. New housing development in urban and rural areas should incorporate a mix of market and affordable house types, sizes and tenures to cater for local needs and create sustainable communities.
- 6.20. Chapter 4 paragraph 4.2.33 sets out that proposals for residential sites that comply with up-to-date development plan policies for the inclusion of an element of affordable housing should be requirements of national policy.
- 6.21. Chapter 6 paragraph 6.6.25 sets out that development should reduce, not increase, flood risk arising from river and/or coastal flooding on and off the development site.

## Technical Advice Note 15 (TAN 15): Development, flooding and coastal erosion

TAN 15 provides guidance on flood risks and coastal erosion for local planning authorities in Wales to consider in development plans and planning decisions. It established flood zones based on probability of flooding and defines development vulnerability categories (highly vulnerable, less vulnerable, water compatible).

The TAN sets out that development should be directed away from area at highest risk of flooding (Zone 3) where possible. Some development may be acceptable in Zone 2 if justified, and flood consequences can be managed. Flood Consequences Assessments are required for developments in Zones 2 and 3 to assess risks and impacts.

### Planning Wales Act and Wellbeing of Future Generations Act

- 6.22. It should be noted that more recently, the Planning (Wales) Act requires a development to be sustainable, with this requirement being in accordance with the Wellbeing of Future Generations Act 2015, the main objective of which is to ensure *'that the land development contributes to the economic, social, environmental and cultural wellbeing of Wales.'*
- 6.23. The Wellbeing of Future Generations Act, defines 'Sustainable Development' as *'the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals'*, thus requires development to adopt the principles of sustainable development.

## 7. Planning Considerations

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### Introduction

- 7.1. When determining a planning application, the relevant authority (in this case Denbighshire County Council) as a Local Planning Authority will be under statutory obligation, as imposed by Section 38(6) of the Planning and Compulsory Purchase Act 2004 to make their determination in accordance with the Development Plan unless material considerations indicate otherwise.

### Principle of Development

- 7.2. The site is not allocated within the Denbighshire Local Plan 2006-2021 for any use type. The surrounding area is primarily made up of residential properties under use classes C2 and C3. It is considered the principle of the proposed use, residential use Class C3, is acceptable at the site.
- 7.3. The site's location within the Prestatyn Development Boundary, as identified in the local plan policies map, makes the site a suitable area for new housing development.
- 7.4. In line with Policy BSC 2, the proposal prioritises the redevelopment of previously developed land, involving the demolition of the former Army Reserve buildings. This approach supports the efficient use of land and contributes to urban regeneration.
- 7.5. The most recent Local Housing Market Assessment (2019) identifies that there is a clear need for affordable housing in Denbighshire, with 34% of the population in need of social housing and 23% in need of intermediate housing. The assessment also realises that there is a requirement for one and two bedded social housing properties. The scheme proposes to provide 100% social rented (therefore affordable housing) one, two and three-bedroom properties. This aligns with local policy BSC 5 and addresses the identified local housing needs by contributing to the county's affordable housing targets.
- 7.6. The development offers a range of house sizes and types, including apartments and houses and a range of one, two and three bedrooms, meeting the requirements of Policy BSC 1. This mix reflects local need and demand, as outlined in the Local Housing Market Assessment.
- 7.7. The development adheres to Policy RD1 by respecting the site and surroundings, making efficient use of land, and providing safe access for various users. It also incorporates sustainable design principles and considers the local context.
- 7.8. At a national level, the proposal supports key principles in Planning Policy Wales, including promoting sustainable development, supporting well-being, and providing a mix of housing types to create balanced communities.

### Design

- 7.9. The design, appearance and functionality of the proposed development has been carefully considered by Creu Architects with relevant national and local design led policy guidance.

- 7.10. The final scheme (Option 18) represents a well-considered response to the site's constraints and opportunities, particularly addressing flood mitigation requirements by setting the development platform at a minimum of 5.92m AOD with finished floor levels at 6.13m AOD.
- 7.11. The proposal creates a high-quality residential environment with a mixture of dwelling types including 4 three-bedroom houses, 9 two-bedroom houses, 8 one-bedroom walk-up apartments, and 26 one-bedroom common access apartments.
- 7.12. The architectural approach draws inspiration from the existing TA Centre building, incorporating complementary materials such as varied brick textures, cladding, and horizontal storey banding.
- 7.13. A distinctive feature of the apartment block will be to introduce height at the corner with Marine Road and Bastion Road. This will reflect the height of the existing building on the corner. The existing height is a tower feature sometimes referred to as a 'clocktower', however it is just a tower feature, not a clocktower and has no historic merit. The site does not fall within a Conservation Area nor is the building a designated or non-designated heritage site.
- 7.14. The proposed apartment block therefore reflects the height of this prominent corner creating a strong identity on arrival at the site. The scheme embraces place-making principles through the creation of shared surfaces, a central SUDS basin, and generous public open space (approximately 445m<sup>2</sup>).
- 7.15. The layout has been carefully designed to maintain a 3-metre easement to the watercourse and accommodate the required drainage infrastructure.
- 7.16. The development has been designed in accordance with the recommendations of the Weetwood Flood Consequences Assessment, which confirms that with the proposed mitigation measures, the site can be developed in accordance with planning policy requirements.

#### Accessibility

- 7.17. The scheme also incorporates appropriate accessibility measures, ensuring all dwellings meet Building Regulation Approved Document M standards.
- 7.18. Other accessible features include:
- Clear opening into each dwelling flat of 775mm
  - Unobstructed corridor width
  - Short lengths (no more than 2m) of local permanent obstruction such as radiators.
  - Switches and socket outlets for lighting and other equipment will be at heights between 450-1200mm above finished floor level.
- 7.19. Overall, the proposal represents a high-quality, distinctive and sustainable development that respects local character while creating an attractive, sociable, accessible and secure residential environment for future residents.

## Sustainable Design

- 7.20. Within the Design and Access Statement prepared by Creu Architects, section 8.5 sets out that the following will be incorporated into the building design:
- Highly insulated and sealed external envelope.

- Sustainable heating and generation (e.g Solar PV Panels)
- Internal potable water consumption reduced by the specification of appropriate appliances
- Insulating materials will avoid the use of substances that have a global warming potential (GWP) of 5 or more.

7.21. Sustainability has been addressed through a fabric-first approach to construction, south-oriented roofs for potential PV installation, and ecological enhancements including bat and bird boxes, hedgehog highways, and native species planting.

## Highways and Access

- 7.22. A Transport Assessment has been produced by Focus Transport Planning in support of this planning application.
- 7.23. The Transport Assessment evaluates the highways and transport impact of the proposed residential development of 47 new dwellings at the former Army Reserve site.
- 7.24. The Site has good access to local amenities and public transport options. There are bus stops located approximately 160m from the site on Marine Road and the B5120 which provide regular services to surrounding areas. Prestatyn Railway Station is also approximately 200m south of the site, offering regional rail connections.
- 7.25. The location of the proposed development allows practical walking and cycling access to a range of everyday destinations within Prestatyn, including shops, schools, leisure facilities and employment areas, in line with Local Policy RD1.
- 7.26. Vehicular access to the proposed development will be via a new priority junction onto Marine Road, located approximately 20m east of the existing site access. The new access has been designed to adoptable standards, with 5.5m carriageway width and 2m footways on both sides. Visibility splays of 2.4mx25m+ can be achieved in both directions, which is suitable for the 20mph speed limit on Marine Road.
- 7.27. The internal layout incorporates a 6m wide access road leading to an adoptable turning head. Beyond this, a 6m shared surface route provides access to the remaining dwellings and apartments. A pedestrian link is also proposed to Bastion Road at the western perimeter of the site.
- 7.28. The TA estimates that the 47 dwellings would generate approximately 20 two-way vehicle trips in the AM peak hour and 24 in the PM peak hour. This equates to less than 1 additional movement every 2 minutes during peak periods.
- 7.29. Detailed capacity assessments have been undertaken for the site access junction and the Marine Road/Bastion Road/Victoria Road signalled junction. The modelling demonstrates that both junctions would continue to operate within capacity in future year scenarios with development traffic. The maximum impact is predicted to be 3-4% increase in traffic on Marine Road.

## Ecology

- 7.30. Enfys Ecology Limited has carried out a series of ecological assessments including a Preliminary Ecological Appraisal (PEA), Preliminary Bat Roost Assessment (PRA) and an otter and water vole survey at the Site in support of this application.

### PEA

- 7.31. The PEA found that the site has limited ecological value. A strip of tall ruderal vegetation was identified along the northern boundary of the site. Prestatyn Gutter, a watercourse running along the northern site boundary, provides some habitat connectivity. No invasive non-native species were recorded within the site boundary. The site has low potential for most protected species due to lack of suitable habitat. Recommended enhancements include native tree/shrub planting and creation of a "hedgehog highway".

### PRA

A Preliminary Roost Assessment found the buildings to have low potential for roosting bats. A small number of common pipistrelle droppings were found in two store rooms of Building 3. Two emergence surveys recorded no bats emerging from the buildings. Building 3 is also considered to be an occasional night roost/feeding perch for a low number of common pipistrelles. A European Protected Species licence will be required for works to Building 3. Mitigation includes timing of works, supervised demolition, and provision of new bat boxes

### Otter and Water Vole Survey

- 7.32. Prestatyn Gutter was surveyed for signs of otter and water vole as part of the ecological assessment. No evidence of otter was found, but the watercourse provides potential habitat. Old water vole burrows were identified along the banks, but no recent signs were seen. The watercourse had recently been dredged, potentially removing more recent signs. Reasonable Avoidance Measures are recommended to protect these species during works. Any works to the banks would require further survey and potentially licensing for water vole

## Flood Risk

- 7.33. A Flood Consequences Assessment and Drainage Statement has been prepared by Weetwood in support of this application, in accordance with the requirements of TAN15.
- 7.34. The assessment demonstrates that while the site is located in flood zone 3, the proposed development can be completed safely and without increasing flood risk elsewhere, subject to implementing appropriate mitigation measures.
- 7.35. The proposed flood mitigation includes setting the development platform at a minimum level of 5.80m AOD and finished floor levels at 6.14m AOD. This will ensure the development remains dry during the 1 in 1000 year tidal flood event including climate change allowances. Surface water will be managed sustainably through the use of an attenuation basin, restricting discharge rates to 50% of the existing brownfield runoff. This approach complies with local and national SuDS standards.
- 7.36. The assessment confirms there is sufficient capacity in the public sewer network to accommodate foul flows from the development. Overall, the flood risk and drainage proposals have been designed in accordance with relevant planning policy and technical standards. The development meets the justification test for zone 3 and will not increase flood risk to the site or surrounding areas.

## Welsh Language

- 7.37. In accordance with Policy RD5, a Community Linguistic Statement or Impact Assessment will be submitted to address potential effects on the Welsh language, ensuring the development is culturally sensitivity.

## Sustainable Development

- 7.38. In line with the Wellbeing of Future Generations Act, which defines '*Sustainable Development*' as follows '*the process of improving the economic, social, environmental and cultural wellbeing of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the wellbeing goals*', it is considered that the proposed scheme adopts the principles of sustainable development.
- 7.39. The proposed scheme is for the redevelopment of a brownfield site which has been vacant and contributing negatively to the local area since 2018. It will provide a new build scheme to deliver energy efficiencies and therefore reduce carbon emissions which will lend itself well to the residents of the affordable homes. The enhanced landscaping that has been proposed as part of the scheme will also bring environmental benefits by allowing existing and new habitats to evolve at the site.
- 7.40. The introduction of new homes in the Prestatyn area will allow people to improve their economic and social wellbeing due to the security of quality homes which are also affordable, in turn improving their health, resulting in the ability to find and secure work (where they do not already have work). Not only does this benefit the individual resident, but the Prestatyn area due to money being earned and spent within the locality.
- 7.41. Accessibility to good quality housing also provides social benefits. Affordable, safe and comfortable living conditions contribute to reduced stress, anxiety and depression, therefore leading to an improved quality of life. On a community scale, well designed neighbourhoods with quality housing foster social cohesion and tend to have lower crime rates, contributing to safer and more engaged communities.
- 7.42. The application site represents a suitable location for residential development, being located at an established residential area and within an accessible location. The site is particularly accessible as it is within a practical walking distance of regularly frequent public transport services (by bus and train) and a wide range of everyday local shops, services & facilities.
- 7.43. Overall, the proposed development meets the overarching objectives of the local development plan, PPW and the Wellbeing Act, therefore bringing significant well-being and sustainability benefits.

## 8. Conclusions

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- 8.1. This Planning Statement has been prepared on behalf of Wales and West Housing Association in support of the full planning application for the demolition and redevelopment of the Former Army Reserve site to provide new affordable housing accommodation at Marine Road, Prestatyn. The proposed description of development is as follows:
- 8.2. *'Proposed demolition and redevelopment for residential development (Use Class C3) at Former Army Reserve, Marine Road, Prestatyn'*
- 8.3. The proposal aligns with local and national planning policies, particularly in terms of redeveloping a vacant, brownfield site within the Prestatyn Development Boundary, providing 100% affordable housing, offering a mix of housing types and sizes to meet local needs, and adhering to sustainable development principles.
- 8.4. The layout creates a strong frontage along Marine Road and Bastion Road, with careful articulation of materials and fenestration that follow the rhythm and principles of the former buildings.
- 8.5. The development features high-quality architectural design that responds sensitively to the site context. The apartment block incorporates a distinctive tower element that reflects the existing building known to many as the 'clocktower', however is not a clocktower. The scheme uses complementary materials including varied brick textures, cladding, and horizontal storey banding that draw inspiration from the existing Army Reserve Centre building
- 8.6. The Transport Assessment demonstrates that the site is well-connected to local amenities and public transport, with minimal impact on the local highway network.
- 8.7. Ecological assessments have been conducted, with appropriate mitigation measures proposed to protect and enhance biodiversity on site.
- 8.8. The Flood Consequences Assessment shows that, with proposed mitigation measures, the development can be completed safely without increasing flood risk elsewhere. The scheme contributes to the economic, social, environmental, and cultural well-being of the area, in line with the Well-being of Future Generations Act.
- 8.9. In conclusion, the proposed development will deliver 100% affordable housing with a social rent model. It represents a high-quality, sustainable residential scheme that will make a positive contribution to Prestatyn's housing supply and local community. It accords with relevant planning policies and addresses all material considerations. Therefore, it is respectfully requested that planning permission be granted for this development.

# Planning Statement

**We can support you with expert advice that reflects your business needs and priorities**

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