

# LDP2 - THE CEFN & CEFN MAWR

## FORWARD

All the recommendations made in this document for inclusion in the WCBC LDP2 are for the betterment of our community of The Cefn and Cefn Mawr at the Central section of the Pontcysyllte World Heritage Site. The picture opposite is an impression of what the Plas Kynaston Canal and Marina would look like with Open Park Land on one side and an appropriate housing development on the other. This would turn the former brown field Monsanto site in Cefn Mawr around for everyone in the county of Wrexham.

By the PKC Group

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## Introduction

The Plas Kynaston Canal, PKC Group was first formed in 2010 to respond to the Local Development Plan, LDP by the Wrexham County Borough Council, WCBC, and the imminent closure of the former Monsanto chemical works in Cefn Mawr. In 2010 the primary goal of the PKC Group was to raise awareness of the potential for the FULL REINSTATEMENT of the Plas Kynaston Canal all the way back to the rear of the Queens Hotel in Cefn Mawr, and get it incorporated into the WCBC LDP.

However, a small section of the chemical works in Cefn Mawr lying directly on the line of the former Plas Kynaston Canal, approximately 10% of the works was kept running and leased out to Du Pont for the production of nano technology materials. This only ceased production in 2014 and the remaining works were scheduled for removal by July 2015. Unfortunately the full reinstatement of PKC was not adopted in the former LDP as submitted by the WCBC to the Welsh Assembly Government, WAG.

Furthermore the LDP of 2010 was rejected by the WAG in 2012. This then required a new LDP to be drawn up, and so LDP2 in 2015.

## Public Support

Our proposal for the full reinstatement of the Plas Kynaston Canal all the way to the Queens Hotel in Cefn Mawr received wide spread and popular public support from our community. In 2010 we handed in a petition of 2000 signatures and over 40 letters of support from local businesses to the Lord Mayor of the Wrexham County Borough Council. This was further followed in 2011 by 1400 representations being submitted under the second round of the public consultation by WCBC at that time. This was singularly the most popular suggestion for incorporation into the LDP. In 2011 we also started our own Tourist Information Service at Lure It Fishing Tackle in Cefn Mawr, which has received regular calls and enquires since, indicating some of the potential our community has, and in 2011 we also started our website, [www.plaskynastoncanalgroup.org](http://www.plaskynastoncanalgroup.org)

In 2012 we put forward the option of site remediation and received a clear mandate with a 99.99% vote in favour of from those that took part, although there was some reluctance to mineral extraction. However the remediation company that we were hoping to engage with, and had shown interest in the site, Scottish Coal, went into liquidation and the proposal went no further.

However it served to clearly indicate the wishes of our local people to have the vacant ex Monsanto site cleaned up. During the same year we contacted Abraham Heights regards a cable car system and looked at the commercial viability of such. This would directly depend on the head count that could be achieved at the Windborne Gate central parking area and was even reported on ITV News. We remain hopeful for both the Windborne Gate as the central parking area for the Pontcysyllte Aqueduct & CCS.

In 2013 the Holly Bush Inn, Cefn Mawr's oldest pub was put for sale by the Pubfolio, the brewery holding company after years of neglect. Since then working in conjunction with the Townscape Heritage Initiative we have been carefully restoring the pub, the oldest section of which is built from the spoil produced during the construction of the Pontcysyllte Aqueduct. This project at the centre of Cefn Mawr has seen wide approval from a broad section of our community. Some of the compliments we have received are, "the leading heritage project in the village" and "the Rovers

Return of Cefn Mawr” and apparently according to quite a few of our regulars we serve the best beer in the Cefn. We were asked to keep the pub open, which we have done throughout the refurbishment program and we thank everyone for their continued support and custom during this period.

In 2014 following on from the £44 million pound line doubling up between Wrexham and Chester and the award of the franchise to Virgin Rail for a direct service between Shrewsbury and London, we suggested a station at Cefn Mawr. This received 3000 likes on facebook in three weeks when we were promoting the concept. During the same year the website saw the total number of visits pass a quarter of a million and a regular hit rate of 300 daily of which 90% are repeat customers.

In 2015 we are hoping to complete restoration of the Holly Bush Inn, and following on from this we will be embarking on the Cefn Mawr & Tesco Permeability Project to encourage footfall frequenting the new Tesco Supermarket, back in to the Traditional Shopping Centre of Cefn Mawr, Crane Street and Well Street. This is being widely supported by all local traders who realise the value of this proposal and would like to see more customers on the streets of Cefn Mawr and in their shops.

Eventually we will open a Cartographic Museum that will specialise in the Pontcysyllte World Heritage Site in the oldest section of the pub to attract more visitors to our community for both interest and research.

We are also, as this document proves, in the process of once again responding to the Local Development Plan, LDP2 for the WCBC and we ask everyone for their continued support in our proposals for our community and future of the Cefn and Cefn Mawr central to the Pontcysyllte World Heritage Site.

Furthermore we thank everyone for their support over the past five years and hope everyone will continue to support us and join in with this most important work for the future of our community, our economy, our children and our grand children.

## Communication

We will be holding meetings regards input for the LDP2 over the coming 18 months for our community which will be posted on our website under the page we are dedicating for this marked **LDP2**. The direct website address is <http://www.plaskynastoncanalgroup.org/ldp2/>

We can be contacted through our headquarters, the Holly Bush Inn, Well Street, Cefn Mawr, LL14 3AE, and telephone **01978 253 447** or our Tourist Information Service at Lure It Fishing Tackle **01978 822 823**.

We can be emailed at [pkcgroup@hotmail.co.uk](mailto:pkcgroup@hotmail.co.uk)

Our official facebook address is <https://www.facebook.com/plaskynastoncanalgroup>

We will also be putting notices out in the Local Community News Letter as and when necessary and writing stories for the Local Press. So if you fancy joining in and helping out please come along, we need all the help we can get and the beer is not too bad either at the Holly Bush Inn!

## LDP2 Introduction

**Please note text in italics is text taken from the LDP2 as proposed by WCBC.**

*The LDP2 sets out to present a general framework for planning in county of Wrexham that is in compliance with the Welsh Planning Policy WPP guide lines, by the Welsh Assembly Government, WAG. The LDP2 covers the following topics:*

1. *Natural Resources*
2. *Built and Historic Environment*
3. *Health, Recreation and Wellbeing*
4. *Waste*
5. *Minerals*
6. *Economy, Retail & Employment*
7. *Population (and housing)*
8. *Infrastructure*
9. *Climate Change*
10. *Transport*

*The Vision for the Local Development Plan is good and states that:*

*“By 2028, Wrexham will be a place where people can live active, healthy and independent lives, our economy will be strong, resilient and responsive to our strategic location within North East Wales and in close proximity to North West England. Wrexham will be a place where everyone feels safe and included which reduces inequalities and a place that positively responds to the quality and distinctiveness of our natural, built heritage and cultural assets”.*

**The PKC Group wish** to help WCBC achieve this and intend to provide positive input for the LDP2 regarding the Cefn area for the community of Cefn at the central section of the Pontcysyllte World Heritage Site. This will then improve the lot in accordance with the LDP2 for our community and the county of Wrexham as a whole.

The WCBC is now in the process of preparing the new LDP for the County Borough which will decide where and how much new development will take place in the County up until 2028. The first step that the PKC Group has been involved in was the consultation process for growth and spatial options to cater for the predicted increases in population. As such the PKC Group completed the Combined Survey Response form and returned to the WCBC.

## LDP2 Objectives & PKC Group Responses

In the Wrexham Local Development Plan 2013 – 2028 Vision, Objectives and Strategic Growth and Spatial Options for consultation with key Stakeholders Summary Document, the following objectives are listed. In return, here we have listed what we believe would be suitable responses that would help develop our community in terms of social wellbeing, environment, economic stability and employment prospects. These proposals would then coordinate with the criteria as set out by the Welsh Government and the WCBC under the LDP2.

**Please note text in italics is text taken from the LDP2 as proposed by WCBC.**



**Objective 1:** *Meet the future needs of a growing population by providing the right type, mix, quality and amount of development and infrastructure in sustainable and accessible locations, ensuring that the role of Wrexham as a key settlement of national importance in the Wales Spatial Plan, and the Wrexham – Deeside – Chester hub is strengthened.*

**The Cefn & Cefn Mawr**, because of its unique location at the centre of a number of major transport routes has a lot to offer under this objective with the right infrastructure development.

- The Cefn lies in the middle of three main road traffic routes in East / West and North South directions along the Dee Valley corridor (A5 & A539) and Welsh Borders (A 483 & A5).
- The Chester / Shrewsbury Railway Line runs through the centre of the community and can with the addition of a Railway Station offer the best solution for Park & Ride facilities in South Wrexham by far.
- The busiest stretch of UK inland water way, the Llangollen Canal, runs over the Pontcysyllte Aqueduct which is immediately adjacent to Cefn Mawr, and the Cefn lies at the centre of the Pontcysyllte World Heritage site corridor.
- Furthermore Offa's Dyke Long Distance Footpath runs through the area, and there is potential for a number of good cycle paths linking in with Llangollen, Pentre, Penycae and Ruabon.

Therefore the Cefn has a unique combination of transport modes in the Wrexham County Borough, road, rail, waterway, long distance footpath, cycle ways and green field sites. The Cefn simply offers the best option for a rural / urban combination transport hub for South Wrexham and the Pontcysyllte World Heritage Site.

**Objective 2:** *Foster mixed communities by delivering housing, including affordable homes to meet the needs of the County Borough, ensuring a range of dwelling types, sizes and tenure through the identification of deliverable housing land allocations with supporting social, environmental and physical infrastructure.*

**The Cefn & Cefn Mawr** has good potential for housing after remediation of the Brownfield sites of the former Air Products and Monsanto works. This could make a significant contribution to the overall targets set by the WAG while avoiding encroachment on Greenfield sites. This would provide housing in terms of the required type, quality and numbers.

**Objective 3:** *Ensuring a supply of jobs to support an increased workforce in the County Borough and surrounding area by providing economic development opportunities to allow existing businesses to expand and grow, and to ensure that the County Borough continues to provide the right type of employment land, in the right location to enable new businesses to locate in Wrexham and take advantage of its strategically accessible location within the wider North East Wales and North West England market regions.*

**The Cefn & Cefn Mawr**, the PKC Group Recommendations are about directly contributing to creating worthwhile, local employment, on a sustainable basis in a manner that will comply with all the aspirations of the LDP2. They are specifically designed to provide opportunity for existing businesses to expand and grow as well as encourage new venture on a sustainable basis that will complement our area and existing businesses as can be seen in this and associated supporting documents.

**Objective 4:** Is specifically about Wrexham Town and so the Cefn and Cefn Mawr is not applicable.

**Objective 5:** Celebrate and promote all our cultural, historical and natural heritage for tourism and economic development opportunities including realising the importance of protecting and enhancing the Outstanding Universal Value of the Pontcysyllte Aqueduct and Canal World Heritage Site and the associated features as well as the surrounding landscapes of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty together with other assets of cultural, heritage and tourism value for the regeneration benefits these will bring to a socially and economically deprived area of the County Borough.

**The Cefn & Cefn Mawr**, the above statement refers to a socially and economically deprived area but fails to name it, could this refer to the Cefn and Cefn Mawr? The Cefn is later identified as one of the more depressed areas of Wrexham in the LDP2 under another section. The Cefn recently lost the main sources of employment and has a higher than the average percentage of unemployment in the Wrexham County.

**Objective 6:** Promote and encourage a healthy, active and safe lifestyle that improves wellbeing through increasing accessibility to services and facilities by locating development in sustainable locations, protecting our green spaces for people and wildlife and designing safe, secure and walkable communities.

**The Cefn & Cefn Mawr** is in the right location to form a rural & urban transport hub and has a large population that is within walking or cycling distance of the village centre. Cefn Mawr was the former centre of the area before the advent of the motor car still retains its intertwined footpaths in the village and can once again become the community centre with the correct planning and infrastructure development. Furthermore the former Plas Madoc Leisure centre has now been taken over by a voluntary group and renamed, Splash Magic and is open for use. All this can be provided without encroaching on Greenfield sites.

**Objective 8:** Conserve, enhance and promote the local culture, character and distinctiveness of Wrexham through recognising, supporting and protecting the Welsh Language and the marked sense of place and local distinctiveness.

**The Cefn & Cefn Mawr** can contribute to this and has its fair share of Welsh speakers in the community as well as its own distinctive character.

**Objective 9:** Reduce the need to travel by car by locating new development in the most sustainable locations, within accessible distance by foot, bicycle, bus and rail to jobs, schools, community, leisure and health facilities, homes and shops, as well as seeking to alleviate known highway infrastructure capacity constraints on the road network within the County Borough.

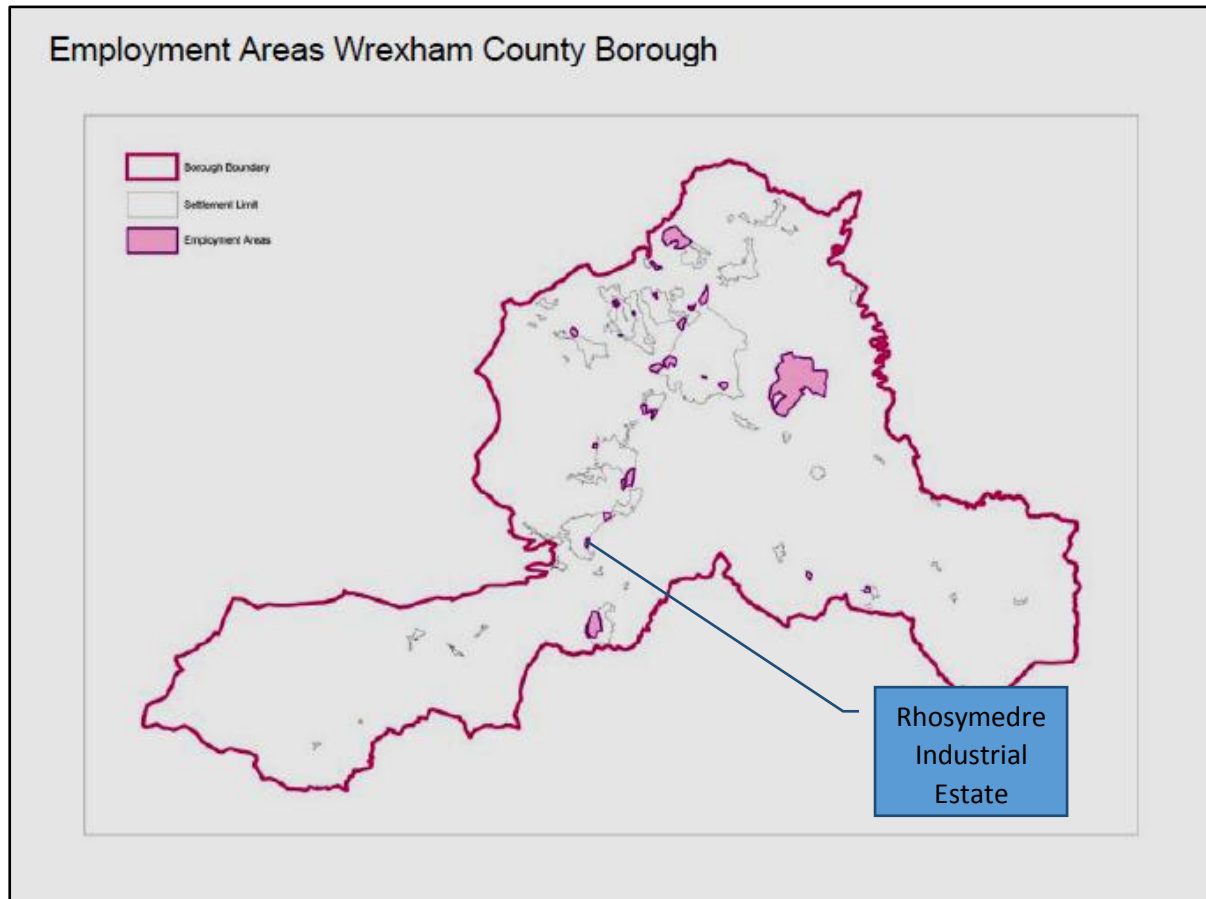
**The Cefn & Cefn Mawr**, again by introducing the correct infrastructure into the Cefn such as a Railway Station which would be within walking and cycling distance of a large number of people, would act as rural / urban transport hub for South Wrexham and the Dee Valley encouraging an increasing number of the population to use the train.

**Objective 10,** maximise our resistance to, and prepare for the consequences of climate change by reducing carbon emissions and the demand for energy, promoting the use of renewable resources, avoiding developing in areas of known flood risk and using a green infrastructure based approach to planning and design of all new development.

**The Cefn & Cefn Mawr**, in general has minimal susceptibility to flooding apart from the freak flooding that occurs from the former Delph colliery and therefore offers good security against these forecast conditions for the future.

## The Cefn & Cefn Mawr and Wrexham County

*The County has a population of 134,844, most of which is concentrated along the A483 (T) road corridor in a settlement pattern that reflects the traditional importance attached to mining and, latterly manufacturing. Wrexham's economy has been transformed in the past twenty years from one dominated by heavy and traditional industry into a major high tech manufacturing technology and services hub. Wrexham Industrial Estate is the UK's second largest industrial estate and among the largest in Europe. The remainder of the industrial estates are mainly located around the A483 corridor.*



*Manufacturing within the County of Wrexham still dominates the employment structure however this is in decline and is anticipated to continue. It is therefore essential to diversify the employment opportunities and encourage alternative inward investment to maintain national importance as a key strategic hub within North East Wales. Wrexham has recently been successful in gaining Welsh Government funding for regeneration initiatives through the Vibrant and Viable Places (VVP) programme with almost £11m being provided via the grant, and private investment support in the region of £14m.*

The Rhosymedre Industrial Estate is one of Wrexham's smallest industrial estates at only 2 hectares of available land. Perhaps some of this grant funding could be used in the Cefn to enable the economy to become more Vibrant and Viable? Note the former large industrial sites (still present) of both Monsanto and Air Products are not shown in the above map LDP2 map.

*Wrexham is a part of the Mersey Dee Alliance (MDA), a partnership which supports strategic economic activity. The MDA's geographical area of focus is North East Wales, West Cheshire and the Wirral. The area has a great diversity of business and is a major contributor to the UK economy and therefore Wrexham is well placed to tap into economic opportunities in both Wales and England.*

**Wrexham** is just one hours drive from major airports in Manchester and Liverpool and 90 minutes from Birmingham. Wrexham is well connected to most of the UK through road and rail links, including train services to London, the UK's largest tourist market. The Bidston railway corridor provides a link to Deeside and the Wirral and there are direct services to Chester, Cardiff and Birmingham International Airport, all running through The Cefn and Cefn Mawr between the Rhosymedre Industrial Estate and the new Tesco Supermarket.

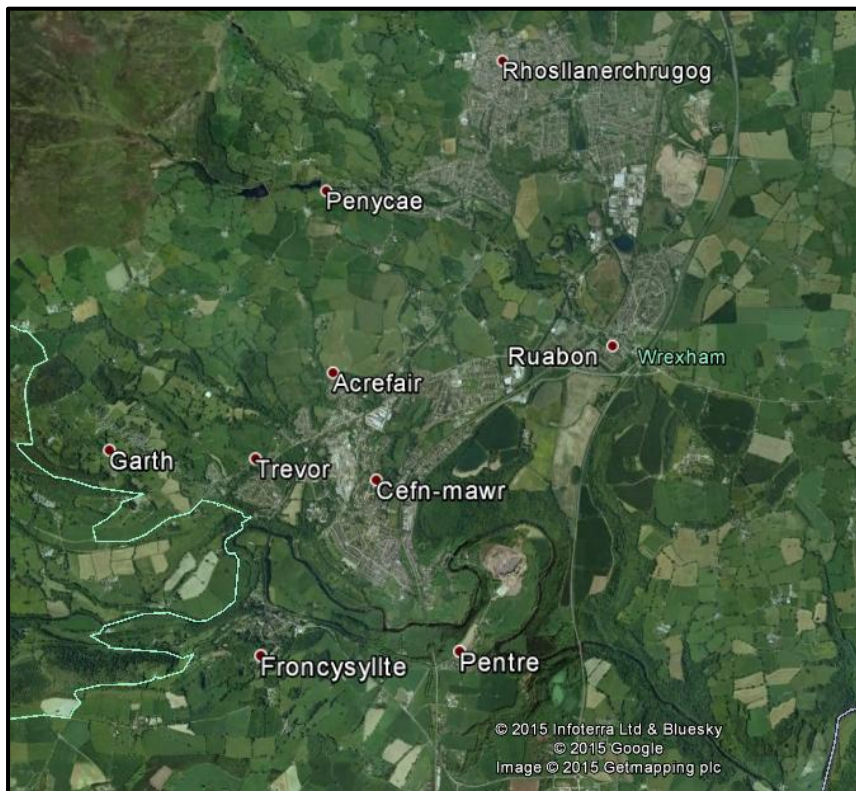
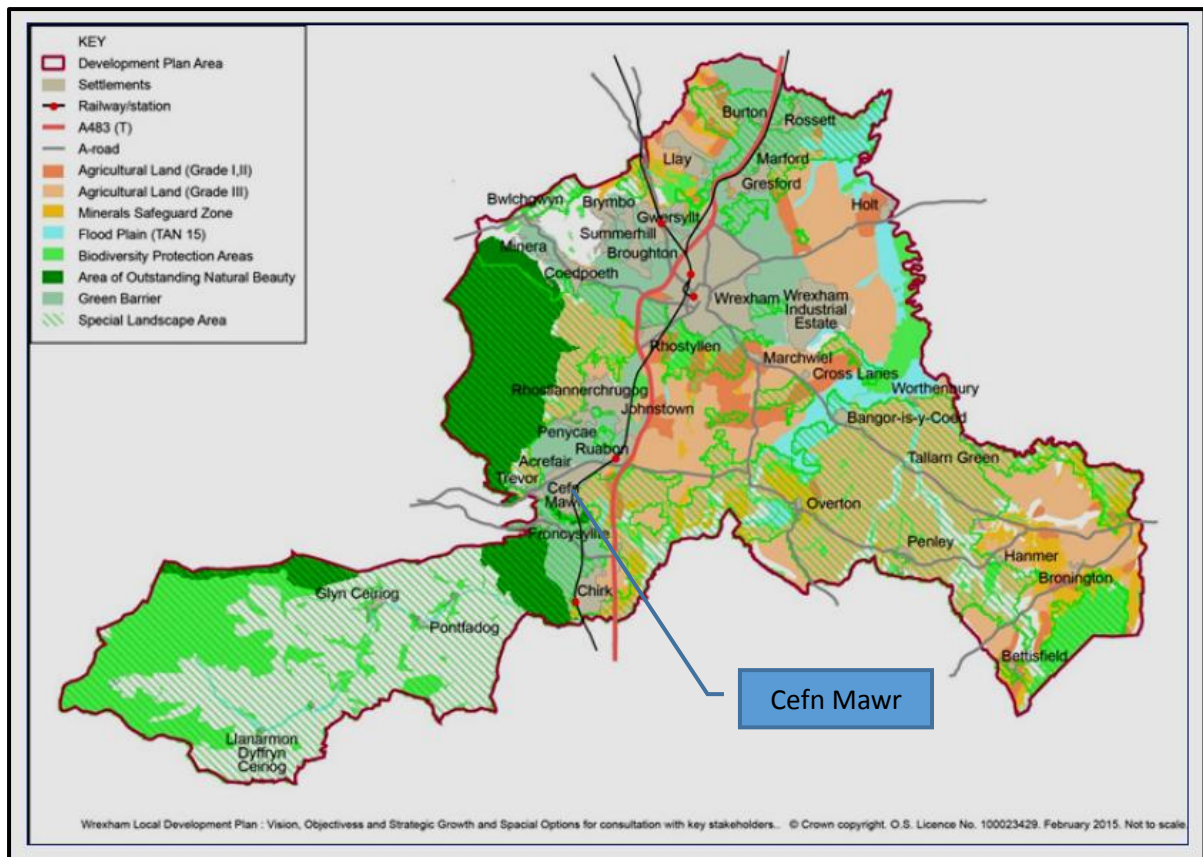


The County Borough benefits from a high quality natural environment with a number of internationally and nationally important sites for wildlife, as well as having a rich architectural heritage with a high number of Conservation Areas, Listed Buildings and Scheduled Ancient Monuments.

It is also home to the Pontcysyllte Aqueduct World Heritage Site with the far western areas of the County Borough forming part of the wider Clwydian Range and Dee Valley Area of Outstanding Natural Beauty where the Cefn & Cefn Mawr forms a central location at a road, rail, waterway and long distance footpath intersection.

There is nowhere else like it in Wrexham or North East Wales.





It can be clearly seen that Cefn Mawr lies at the centre of a number of villages in South West Wrexham County. Having one of the largest populations in the area, and largest on the Chester to Shrewsbury Railway Line outside Chester, Wrexham and Shrewsbury, coupled with the yet undeveloped tourist potential of the Cefn, Cefn Mawr, the Pontcysyllte Aqueduct, the Cefn Viaduct and Ty Mawr Country Park. Cefn Mawr can once again become the central transport hub for the area and the Dee

Valley under the aspirations of the LDP2 and Welsh Spatial Policy. Cefn Mawr and the Cefn lie at the central section of the Pontcysyllte World Heritage Site corridor and it is essential that this is developed with the correct infrastructure to support and foster the growth of the existing local businesses and community.

## Key Issues and Drivers for the LDP2 & Responses

- *Strengthening Wrexham Town as a key settlement of national importance with a focus for investment in future employment, housing, retail, leisure and services.*

**The Cefn & Cefn Mawr** can help achieve this for Wrexham Town, by establishing itself as a part of the top tourist attraction in North East Wales along the lines of a Hebden Bridge or Blists Hill model for the Pontcysyllte World Heritage Site, and as the transport hub for South Wrexham feeding into Wrexham Town mainly by rail to alleviate congestion on the A483.

- *There is a lack of Brownfield capacity to accommodate projected household growth in the County Borough.*

**The Cefn & Cefn Mawr** can provide significant Brownfield capacity with the remediation and redevelopment of the former Monsanto and Air Products sites.

- *The County Borough is over-represented in declining sectors of the economy such as manufacturing and the quality and diversity of the employment offer needs improving.*

**The Rhosymedre Industrial Estate** has been in decline for a number of years and is in need of commercial enterprise stimulus. A railway station with large park and ride facilities would stimulate growth on this estate and encourage new business to move in. The former main employers for the **Cefn & Cefn Mawr**, Monsanto and Air Products have moved manufacturing elsewhere in the world and now those sites lie idle or underused and are addressed in the recommendations presented by the PKC Group which will diversify and improve the employment prospects for the Cefn & Cefn Mawr, if adopted?

- *Significant population and household growth is predicted over the Plan period but the capacity of some settlements may be constrained.*

**The Cefn & Cefn Mawr** has some significant capacity for accommodating household growth on Brownfield sites but should be balanced so as not to be detrimental to the present community or the Pontcysyllte WHS status and AONB, such as happened in Dresden, Germany. WHS status was removed through inappropriate numbers of housing units being built.

- *There are transport infrastructure capacity constraints along the A483 trunk road and accessibility within Wrexham Town Centre is constrained.*

**The Cefn & Cefn Mawr** offers a solution to a large proportion of this by establishing it as a rural / urban transport hub for South Wrexham and the Dee Valley. This could then provide direct rail access into Wrexham Town centre without additional traffic on the A483 or in the Town of Wrexham itself.

- *Parts of the County Borough experience high levels of multiple deprivations with some areas amongst the highest 10% most deprived in Wales, including our Communities First areas.*

**The Cefn & Cefn Mawr** has its own fair share of these unfortunate circumstances.

- *Welsh language and Culture is a distinctive part of the fabric of some communities in the County Borough.*

**The Cefn & Cefn Mawr** has its own fair share of Welsh Speakers and supports the Welsh Language.

- *There is a need to prioritise infrastructure requirements through new development e.g. education, highways, public open space and affordable housing.*

**The practical proposals** for the Cefn and Cefn Mawr by the PKC Group will do this without encroaching on green field sites.

- *Maintaining, enhancing, restoring or adding to local biodiversity /geo-diversity, landscape and tree conservation interests.*

**The practical proposals** for the Cefn and Cefn Mawr by the PKC Group will do this very well, as it is a priority for all PKC Group Proposals to be environmentally friendly in all respects, and why the PKC Group is so supportive of the new LDP2.

- *Ensuring protection, conservation and enhancement of the County Borough's Area of Outstanding Natural Beauty (AONB), World Heritage Site (Pontcysyllte Aqueduct), other historic assets, protected species and European Designated sites including the River Dee Special Area of Conservation (SAC), Berwyn Special Protection Area (SPA) and Berwyn and South Clwyd Mountains SAC.*

**The practical proposals** for the Cefn and Cefn Mawr will do this very well, as it is a priority for PKC Proposals to protect the environment and heritage of our community in all respects. All our proposals are designed to add to and compliment such, please read them.

- *There is a need to identify, manage, expand and enhance the County Borough's Green Infrastructure network, including areas of public open space and recognising its importance in delivering local environmental, socio economic and health benefits.*

**The practical proposals** for the Cefn and Cefn Mawr by the PKC Group will do this very well, such as re-establishing former Brownfield sites within the community as public open green space in conjunction with the inland waterway system and why the PKC Group is so supportive of the new LDP2.

- *Dealing with the impact of climate change through adaptive planning locating new development away from areas of known flood risk.*

**The Cefn & Cefn Mawr** is not generally in a high flood risk area, apart from runoff from the former Delph Colliery which occasionally causes problems.

## LDP Strategic Growth and Spatial Options

*The options identified assume that housing development without employment in the same broad location, and vice versa, is less sustainable and is to be avoided. Similarly, infrastructure improvements need to be aligned with new development, including improvements to transport networks, utilities, green infrastructure, health, education and social facilities. Consequently, the term 'development' is used in the Spatial Options for Growth to refer to the balance of housing, employment and the accompanying infrastructure.*

**Comment:** we fully agree with this and make practical suggestion for the implementation of such in the Cefn and Cefn Mawr area. There has to be a balance so that our community can improve and add to the whole of the County Borough and North East Wales.

*It is important to note that the Spatial Growth Options put forward are not intended to define precise boundaries, sites or land use allocations at this stage. Such detail will form part of the Preferred Strategy stage later in the process.*

[www.wrexham.gov.uk/assets/pdfs/planning/ldp2/delivery\\_agreement\\_dec2014.pdf](http://www.wrexham.gov.uk/assets/pdfs/planning/ldp2/delivery_agreement_dec2014.pdf)

*It is critical that new development areas must be served or are capable of being served, by appropriate infrastructure. This includes for example appropriate transport routes and services, education provision, community facilities, utilities and drainage infrastructure. The likelihood of delivering new infrastructure in association with development will depend on a number of factors, not least of which will be likely opportunities for funding the delivery of development. The consideration of **funding opportunities for new infrastructure** must be integral to the assessment process and will influence the Preferred Strategy.*

*Developers have been given the opportunity to submit sites they wish to see included in the Plan. These are called, 'candidate sites' none of which have been endorsed by the Council at this stage. They will be carefully assessed to see if they merit inclusion in the Plan.*

**Comment:** The PKC Group was not made aware of this and will submit at the later date as indicated under the "LDP Strategic Growth and Spatial Options" from the LDP2.

*The Candidate Site assessments will continue alongside the work to formulate the LDP Preferred Strategy and the Council's appraisals on individual topic based planning issues such as flood risk, open space provision, employment land availability, urban capacity and infrastructure.*

**Comment:** This is good to see and we look forward to working with the WCBC for the best outcome for the Cefn and Cefn Mawr which is central to the Pontcysyllte World Heritage Site and a part of the County of Wrexham.

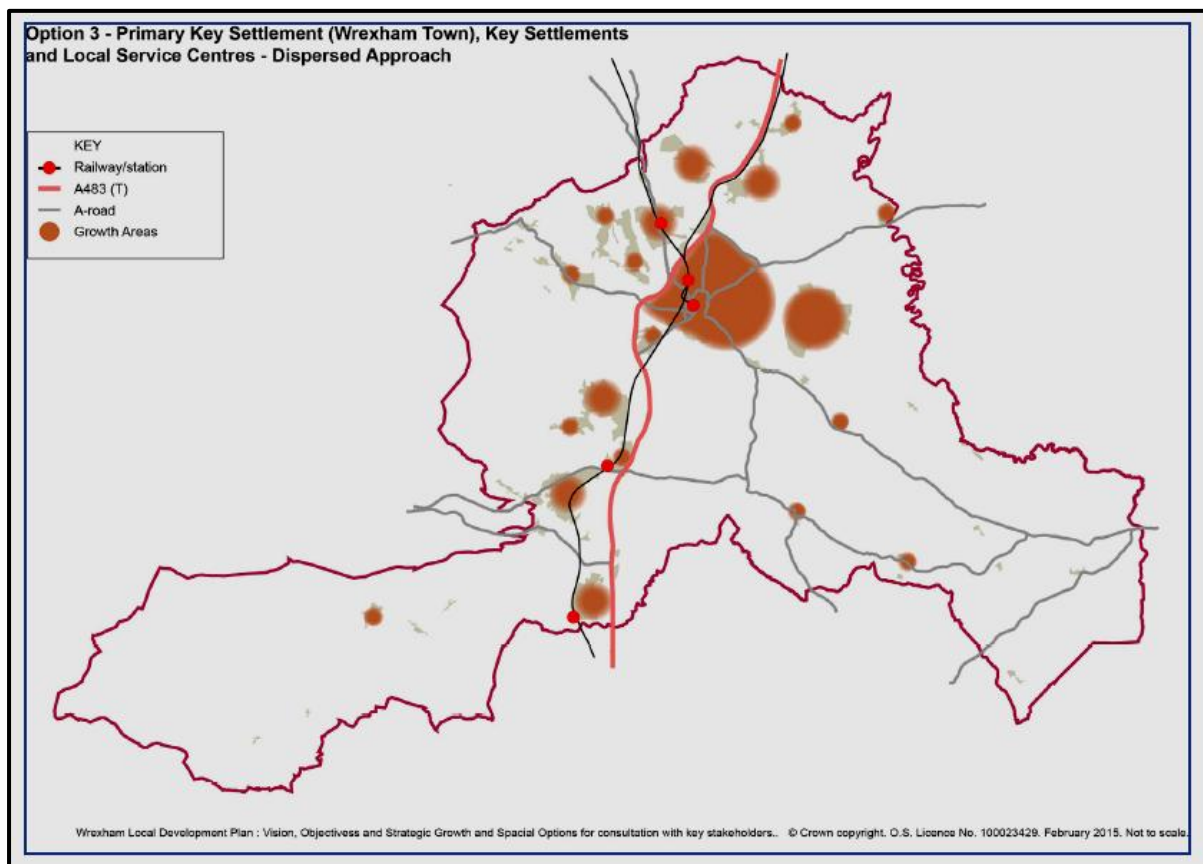


*Whilst the Candidate Sites that have been put forward to provide a context for considering strategic options, they do not represent the only areas of land that could potentially be allocated in the Plan. That is, it is possible for land not identified during the Candidate Sites process to lie within an area for potential growth and be suitable for allocation in the Deposit Plan. Should this arise, there will still be an opportunity to comment on these sites as part of the consultation process on either the Preferred Strategy and/or at the Deposit Stages.*

**Comment:** This will be done in accordance with WCBC procedures for such in the LDP2 process for the Cefn and Cefn Mawr which is central to the Pontcysyllte World Heritage Site and a key location for the Dee Valley and South Wrexham as a local service centre.

### Primary Key Settlement and Local Service Centres Option 3

Of the three options for development in the LDP2 the PKC Group prefers Option 3 or C as this would basically appear to be the most suitable for Wrexham County as a whole. Under this option the Cefn and Cefn Mawr area is indicated for growth. However this part of the LDP2 is not clearly defined and although the documents talks about jobs and housing, it does not offer any indication of how jobs, be they sustainable or whatever, are going to come about. The only thing offered is the apparent amount of land to be designated for such. Unfortunately this alone will not produce employment.



## Funding

*The private sector and central Government will have a key role in implementing the LDP through investment in housing (including affordable housing), employment, transport infrastructure and retail. Much infrastructure is also dependant on private sector investment, including water and sewage facilities. The Council will work closely with the private sector to make sure that investment is contributing to the objectives of the LDP.*

**PKC Group:** Supports this and makes contribution towards the LDP2 to bring about the best outcome for Cefn and Cefn Mawr which is central to the Pontcysyllte World Heritage Site as a part of the County of Wrexham. Furthermore all the proposals made by the PKC Group should be eligible for major funding as they meet all requirements for such. The PKC Group Proposals not only promote the Heritage of the Cefn and Cefn Mawr area, such as the Pontcysyllte Aqueduct, Cefn Viaduct, Ty Mawr Country Park etc., they also benefit the local community by directly improving the economy which will help generate employment opportunities on a local and sustainable level. Furthermore this will be achieved without introducing unfair competition to local businesses that are currently struggling in the community to make ends meet.

*The Council will be producing further documents including Master plans and development briefs at the appropriate time. These documents will provide certainty for the future land uses in particular areas and will help secure benefits and infrastructure through planning obligations.*

**PKC Group Response:** The group is concerned about this paragraph as having seen the ARUP Master Plan as unveiled by WCBC in 2013 and the later PLS Report unveiled in 2014, these proposals do nothing for the Cefn and Cefn Mawr and do not comply with LDP2 guidelines. They are solely based on the aqueduct with virtual disregard to the surrounding community and in the case of the PSL proposal involve the loss of open public space and green belt land for no good reason.

The ARUP Master plan is for a new retail type park at the Trevor Basin with a large and costly visitor centre. This will only continue to isolate Cefn Mawr at the centre of The Cefn from the tourist industry and will be counterproductive to the stated aims and objectives of the LDP2 and the economy of Cefn Mawr.

We ask, why not follow the guidelines of the LDP2 and use the available and historic infrastructure as proposed by the PKC Group which would support local existing businesses and improve the general economy and environment as indicated should be the case in the LDP2?

The PSL proposal is basically a 1.5 million pound café built on top of the Pontcysyllte Aqueduct on what is currently a green field site, complete with a car park extension into a pristine field, consuming even more greenbelt land when there is a brown field site immediately adjacent?

Again we ask, why not follow the guidelines of the LDP2 and use the available and historic infrastructure as proposed by the PKC Group which would support local existing businesses and improve the general economy without the loss of open public space and green belt land?

*The LDP is undergoing a Sustainability Appraisal throughout its preparation. This will make sure that the policies should deliver positive effects for the community and environment as a whole.*

**PKC Group Response:** The group hope that this will be the case when it comes to the ARUP Master Plan, PSL plan and other large “property developers” , supermarkets and retail parks.

## Developer Contributions

*The LDP will provide a general policy relating to requirements for developer contributions. The developer contributions required may include:*

- *Affordable Housing*

**We support** the quota for affordable housing and further suggests that they should be reflected in the housing numbers that could be accommodated on the ex-Monsanto site and should be built to the highest standards.

- *Local highway works*

**We support** the WCBC with highways and continue to ask WCBC for appropriate sign posting on main roads leading traffic to the Central Parking location for the area at the Windborne Gate. Please see our proposal on such.

- *Transport infrastructure – including new roads, new rail links, walking and cycling routes*

**The PKC Group will** be making representation and recommendation for:

1. The opening up the Windborne Gate parking area as the central tourist parking area for the Pontcysyllte Aqueduct, Cefn Mawr and the Cefn. The first stage in bringing tourism to the Cefn and with everything within walking distance.
2. Jessop's Tramway, which will link the centre of Cefn Mawr directly to the Aqueduct, Trevor Basin and the Windborne Gate parking area and be the second stage in bringing tourism to Cefn Mawr in real numbers, by horse drawn carriage.
3. Connection of the Windborne Gate parking area to the centre of Cefn Mawr by Cable Car, dependant on numbers at the Windborne Gate Parking Area (3rs stage).
4. A train station for Cefn and Cefn Mawr adjacent to the Tesco Supermarket with large park and ride facilities for both motorists and cyclists. The fourth stage of bringing tourism to Cefn Mawr, by National Rail.
5. The FULL Reinstatement of the Plas Kynaston Canal all the way to the Queens Hotel, terminating in a 60 berth marina. The fifth stage of bringing tourism to Cefn Mawr, by the inland waterway network and Llangollen Canal.

- *Offsite provision for open space provision.*

**We recommend** approximately half the ex-Monsanto site should be public open space, i.e. all the land to the West and South of the Plas Kynaston Canal would be open parkland.

- *Tree planting biodiversity and landscaping.*

**We advocate** this will be a feature of the Open Public Space Parkland on the ex-Monsanto site and the other land around Cefn Mawr formerly belonging to Monsanto.

- *Renewable energy.*

**We have looked** into the possibilities for a small hydroelectric scheme to be combined with the Plas Kynaston Canal Project and this can be appraised as a part of that package.

- *Public realm/town centre improvements*

**We have been working** in conjunction with the THI and WCBC on restoring the Holly Bush Inn at the very centre of the village. The oldest Pub in the Cefn and will be continuing through the course of 2015 with Cefn Mawr & Tesco Permeability Project. The Holly Bush Inn will also eventually host the planned Cartographic Museum for the Pontcysyllte World Heritage Site.

- *Public Art.*

**We have submitted** a basic proposal for reopening the Ebenezer as an Art Studio and School for the local and eventual tourist communities. This would help turn the currently depressed community of Cefn and Cefn Mawr around to being a Hebden Bridge or Blists Hill of the Pontcysyllte WHS, County of Wrexham and North East Wales.

- *Community Facilities*

**The PKC Group provides** the Holly Bush Inn as a public house and actively supports all other community facilities in the area and will continue to do so. If our recommendations for the LDP2 are adopted and implemented the PKC group will provide public toilet facilities as a part of the second phase of building works at the Holly Bush Inn at the very centre of Cefn Mawr.

- *School places/new schools*

**We try** to provide what support it can for local schools in the area and will continue to do so. It is intended that both the Cartographic Museum at the Holly Bush Inn and Ebenezer School of Art will work with local schools in the future providing additional educational opportunities for our younger people.

- *Health Provision*

**We try** to provide whatever support it can for local health services and will continue to do so.

## Settlement Hierarchy and Development Potential

Whilst it is likely that larger settlements in a more urban setting will tend to perform key functions, it is important to recognize that rural areas make up a significant part of the County Borough. National Policy highlights the interconnectedness of urban areas and rural hinterlands and the Cefn and Cefn Mawr in South Wrexham is an ideal example. Subject to effective transport links, larger settlements can provide a range of services and employment opportunities for those living in rural areas.

However, in more remote locations or where transport links are poor, this assumption may not be correct. In those instances consideration regarding the location of development may need a different approach. National Policy advises that development in rural areas should be directed towards local service centers or clusters of smaller settlements where sustainable functional linkages can be demonstrated, such as a transport hub in Cefn Mawr.

Cefn Mawr is a semi urban community surrounded by the other villages of the Cefn and rural communities. It can and should once again form the central hub for the area of South Wrexham, it once was before the dawn of the motor car. Coincidentally today in 2015 it is the motor car that is accounting for the success of the new Tesco Supermarket, simply because it is so much easier to go to the store in Cefn Mawr than drive into Wrexham on the overcrowded A483.

Settlement Hierarchy	Settlement
Tier 1: Primary Key Settlement	Wrexham Town
Tier 2: Key Settlement	Acrefair/Cefn Mawr Chirk Coedpoeth Gresford/Marford Gwersyllt Rhosllanerchrugog
Tier 3: Local Service Centres	Bangor Broughton Brymbo Glyn Ceiriog Holt Llay Overton Penley Penycae Rhostyllen Rossett Ruabon
Tier 4: Minor Village	Bersham Bradley Bronington Bwlchgwyn Crosslanes

	Dolywern/Llwynmawr Froncysyllte Garth Hanmer Llanarmon DC Marchwiell Minera Pentre Bychan Pentre Pontfadog Rhosrobin Southsea Tallarn Green Tanyfron Trevor
Tier 5: Hamlet	Bettisfield Burton Gwynfryn Halton Horseman's Green New Brighton Sydalit Tregeiriog Worthenbury

Please note that we are glad to see that Cefn Mawr / Acrefair is at the top of Tier 2 next to Wrexham in this table of Settlement Hierarchy from the LDP2. Cefn Mawr is central to 12 surrounding villages:

- Rhosymedre
- Plas Madoc
- New Bridge
- Cefn Bychan
- Froncysyllte
- Cysyllte
- Acrefair
- Penycae
- Ruabon
- Trevor
- Pentre
- Garth

Therefore Cefn Mawr should be the central hub for South Wrexham, the Pontcysyllte World heritage Site and Dee Valley with appropriate infrastructure such as a Railway Station to support the local communities transport needs in a sustainable way that will reduce CO2 emission while boosting the tourism industry in the County of Wrexham in accordance with the LDP2 and Welsh Spatial Plan policies.

## Appendix 4 - Settlement Function and Development Potential spreadsheet

	Acrefair/Cefn Mawr	Bangor	Berham	Bettisfield	Bradley	Bromington	Broughton	Brymbo	Burton	Bwlchgwyn	Chirk	Coedpoeth	Cross Lanes	Dolymern/ Llwynmawr	Froncysyllte	Garth	Glyn Ceirion	Gresford/ Marford	Gwersyllt	Gwynfryn	Halton	Hammer	Holt	Horseman's Green	Llanarmon DC	Llany	Marchiel
<b>Settlement Function</b>																											
<i>Employment/ Economic Opportunities &amp; Function</i>																											
Labour Force (% of population economically active)	Red	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Unemployed (% of economically active population out of work)	Red	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Employment Area Located in the settlement limit / distance to nearest employment area	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Employment Land Review	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Employment function conclusion	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
<i>Community Services and Retail Role</i>																											
School	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Health Care Provision	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Retail Provision	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Other facilities	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Recreation Capacity	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
<i>Sustainable Travel Options</i>																											
Public Transport Provision (bus)	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Public Transport Provision (train)	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Walking/ cycling	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Settlement Function Conclusion	2	3	4	5	4	4	3	3	5	4	2	2	4	4	4	4	3	2	2	5	5	4	3	5	4	3	4
<b>Development Opportunities</b>																											
Potential sites which can accommodate residential development (green or amber sites)	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
<b>Constraints</b>																											
Flooding	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Sewerage /waste water treatment	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Ecology	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Built heritage	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Agricultural land classification	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Mineral resource	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
School Capacity	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Highways capacity	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow

This table is taken from the WCBC LDP2 document called "Settlement Hierarchy and Development Potential" shows the conclusions that the WCBC has formed about our community in Cefn Mawr & Acrefair. The two most striking indications are the above average unemployment levels and the best potential for residential development. The green sector for the employment area is referring to the proximity of the Rhosymedre Industrial Estate; however the employment opportunities currently available as of 2015 on the Rhosymedre Industrial Estate are low with literally a lot of room for improvement. The Rhosymedre Industrial Estate needs a significant boost to encourage inward investment and increase employment levels in the area. Our proposals will do this if adopted into the LDP2 and followed through in very real terms, please just read on and find out how.



## Sustainability Appraisal Scoping Report

*Sustainability means treating the earth with respect so that it is in a healthy state for future generations. It also means making wise and sometimes challenging decisions in order to achieve positive benefits in economic, social and environmental terms.*

- SA - Sustainability Appraisal
- SEA - Strategic Environmental Assessment

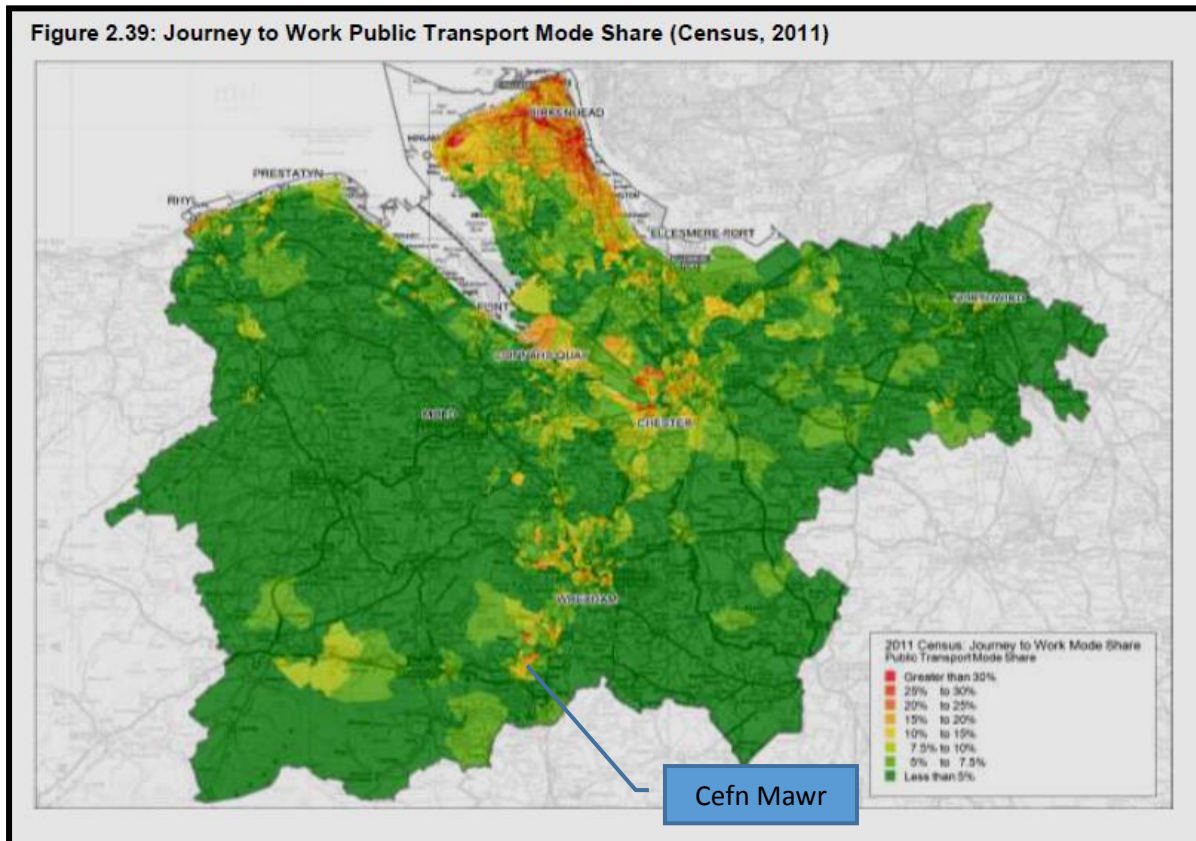
*Article 1 of the SEA Directive states that its objective is: “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”. The Directive requires the Council to assess the likely significant effects of its plans and programmes on: “the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship of the above factors” including “secondary, cumulative, synergistic, short, medium, and long-term, permanent and temporary positive and negative effects”.*



**The Cefn and Cefn Mawr** at the central location for South Wrexham, the Pontcysyllte World Heritage Site / Corridor and the Dee Valley.



The Cefn and Cefn Mawr lies at a central location for three of the main local employment areas, Wrexham, Oswestry and Llangollen, and at the mid point between Chester and Shrewsbury on the railway line. The Cefn and Cefn Mawr has the potential for good sustainable growth that can comply with all aspects of the SEA Directive and Welsh Spatial Planning Policy. As the old saying goes, location s every thing, and this needs to be made the most of by establishing the Cefn Mawr as a transport hub for South Wrexham, the Pontcysyllte World Heritage Site and Dee Valley.



This figure taken from the North East Wales Integrated Transport Task Force Technical Report by AECOM shows the areas where public transport mode share to work is highest based on the 2011 census for journeys to work data. Public transport usage is generally low with few areas greater than 30% mode share. However it does show that the Cefn and Cefn Mawr scores between 20 and 30% for South Wrexham. Therefore yet another good indication for establishing the Cefn & Cefn Mawr as the transport hub for South Wrexham and the Pontcysyllte WHS & Dee Valley.

Few areas of North East Wales have high public transport mode share, reflecting the lower population density, public transport provision and complexity of journey patterns in the area.

Furthermore in the following table from the same report by AECOM Llangollen is listed as a town that people migrate from, to other areas to work, however in the above figure Llangollen does not even feature, where as the Cefn & Cefn Mawr does. The Cefn & Cefn Mawr also outnumbers Llangollen and Chirk combined and is the largest community in the Pontcysyllte World Heritage site by far. Hence this is indicated in the above figure for transportation to work being in the region of 20 to 30% travelling to work by public transport. An integrated rail, bus and private car system would only serve to increase the usage of public transport at this location to the other major employment areas such as for example Wrexham Industrial Estate, Dee Side, Wrexham, Chester and Shrewsbury.

Table 2.3: Journey to Work Origin-Destination Movements within the Study Area, All Modes (Census, 2001)

	Destination																														Total From Origin
	Bebington	Birkenhead	Broughton	Buckley	Chester	Connahs Quay	Deeside	Denbigh	Ellesmere Port	Ewloe	Fint	Frodsham	Heswall	Holywell	Hoylake/West Kirby	Llanelwyl	Mold	Neston	Northwich	Prestatyn	Queensferry	Rhyl	Rossett	Ruthin	St Asaph/Bodelwyddan	Wallasey	Winsford	Wrexham	Wrexham Industrial Estate		
Bebington	4633	188	15	773	12	36	1861	14	26	13	372	6	29	25	379	34	9	77					9	86	18	2	38	8655			
Birkenhead	47	171	9	53	7	258	3	1597	12	31	9	823	6	91	12	289	33	9	77	9				2931	12	22	16	6527			
Broughton	13	18	37	777	1	181	76	28	27	6	12	6	57	1	9	96						3	3	9	6	49	37	1452			
Buckley	48	43	549		789	33	439	9	21	127	112	6	3	65	6	675	19	21	1	18	15	13	28	29	9	3	29	117	3233		
Chester	513	31	955	88	32	862	21	1856	83	138	6	31	57	33	15	28	139	231	27	38	18	38	3	59	89	152	313	255	6111		
Connahs Quay	63	52	725	215	1216		1478	6	342	172	446	6	3	145	6	41	21	9	38	741	27	6	25	33	27	9	121	114	6087		
Deeside	9	9	41	22	17	117		45	3	2	3	6	3	24	6	3	74								3	17	6	410			
Denbigh	6	8	16	26	3	21	15	27		28		6	67		66	1	231	6	212	467	3			87	16	1312					
Ellesmere Port	125	762	391	81	3988	34	9	3	25	112	68	78	12	97	68	56	17	24	229	18	15			12	211	11	76	95	6617		
Ewloe	42	39	316	112	74	353	361	5	185	87	4	6	36	9	233	21	12	6	219	9	6	6	21	12	12	113	38	2337			
Fint	16	19	252	68	372	32	453	12	114	43		6	4	245	3	268	3	6	34	148	26	6	9	5	6	82	2	2234			
Frodsham	36	31	11	259	3	32	12	3	1	3		6	3	6	3	136			7					6	6	56	3	11	634		
Heswall	111	243	43	6	362	33	15	475	1	18	7		558	2	289	21		25	6				3	3	61	12	23	12	2329		
Holywell	23	18	171	39	222	159	221	26	56	33	325	3		236	6	115	88	89					24	125	6	66	35	2089			
Hoylake/West Kirby	75	2682	31	9	226	34	92	38	3	7	3	516	3		3	124	13	3	3	3			3	822	9	19	1	4722			
Llanelwyl			4	3	24	6	5	12	12		7			13				6	6	3	19	5			17	52	194				
Mold	26	23	27	14	246	128	172	2	9	52	122	3	3	69	3	9	3	15	75	3	11	33	28	9	6	191	58	1340			
Neston	743	732	65	9	657	77	181	831	9	25	6	259	9	11	15	18	34		3	3	3	3	176	18	3	12	3899				
Northwich	38	45	19	12	398	24	25	3	162	3	6	69		6	3	3	6	9	3	9			3	15	1478	3	12	2354			
Prestatyn	13	3	135	52	2	125	189	154	46	21	156	4	299	7	137	6	3	63	1516			64	975	6	12	66	34	4088			
Queensferry	13	9	194	54	371	215	263	8	54	47		3	24		56	15	3	6				6	6	6	3	9	24	18	1407		
Rhyl	6	9	79	15	19	26	139	197	19	12	67		115	15	56		6	665	33			74	1389	6	3	46	28	3024			
Rossett	2	8	24	8	248	15	2	3	3	3			3	22				9	1							169	65	588			
Ruthin		8	8	14	36	19	25	133	3	7	13		7	8	68			6	6	38			67		65	12	543				
St Asaph/Bodelwyddan	6	3	18	3	18	12	27	91	18	1			3	3	15			83	276			26				21	6	630			
Wallasey	1686	58	73	6	314	38	187	917	6	31	3	349	3	754	7	125	15	3	53	6		3	3			21	18	4679			
Winsford	15	24	1	6	272	21		89	3	3	21		3	3	3	3	224				3			6	6	9	18	730			
Wrexham	3	21	162	57	617	91	16	13	119	27	63	6	3	33	6	27	125	9	15	6	54	31	159	28	42	9	21	2659	4422		
Wrexham Industrial Estate	12	12	13	3	121	14	7	22	3	3				3	17	6	6	3	9			13	3			227		497			
Total To Destination	3690	9535	4674	973	12497	1643	5717	690	8951	747	1906	248	2460	1189	1634	95	2285	1531	833	1149	2184	2327	282	572	3302	4514	1847	1884	3785		

Figure 2.20 shows the distance travelled to work for residents of the different local authorities in the study area.

The Cefn and Cefn Mawr should have been shown in the above table having one of the highest movements of people to and from work using mode share from their place of residence, for South Wrexham, i.e. between 20 to 30%. By improving the transport facilities at Cefn Mawr with the addition of a railway station and local bus services co-ordinated with it this would increase the number or percentage of people using the railway as a main form of transport. This would have the knock on effect of likewise reducing the number of people using private transport, i.e. the car and reducing traffic congestion on one of the busiest trunk road in North Wales, the A483. Then as a matter of course, since rail travel is far more efficient form of transport than the private car for mile per unit production of CO<sub>2</sub>, the carbon foot print for the area would also be reduced.

## Natural Environment Topic 1

### Key Outcomes

For Welsh Assembly Government in the 'Environment Strategy for Wales' (2006) are:

- *Greenhouse gas emissions are minimised, consistent with Wales contributing fully to meeting UK-wide targets in line with more specific Wales targets that are under development.*

**The Cefn & Cefn Mawr** can make a large contribution to this outcome by establishing Cefn Mawr as a transport hub for South Wrexham, the Pontcysyllte World Heritage Site and Dee Valley so encouraging more people to use a sustainable mode of transport such as the train and well connected public bus services timed to coincide with train times. This would be very similar to the MRT system employed in Singapore where local bus services for the area feed into the local centres that are connected by the MRT train service which is very successful. It is only by providing an efficient and speedy public transport service that the switch will be made back from private transport to a public transport system and Cefn Mawr has the potential for providing this which will contribute towards CO2 reduction.

- *Soil is managed to safeguard its ability to support plants and animals, store carbon and provide other important ecosystem services.*

**Soil management** is a top priority for the remediation of the ex-Monsanto sites.

- *The loss of biodiversity has been halted and we can see a definite recovery in the number, range and genetic diversity of species including those that need very specific conditions to survive.*

**Comment:** we fully support the protection of wild life and biodiversity, and currently maintain a small section of woodland for that purpose.

- *Environmental nuisances such as litter, fly-tipping, graffiti, dog fouling, fly-posting, noise pollution and light pollution are minimised.*

**The Community of Cefn & Cefn Mawr** are doing their best to minimise these anti social behaviours that are detrimental to our community.

- *A reduction in air pollution leads to increased life expectancy and ecological protection.*

Since the closure of Monsanto's works and the **cessation of H2S gas release** into the atmosphere there has been a noticeable improvement in health of the community.

- *The extent of contaminated land is better understood and actions are being taken to remediate contaminated land for beneficial use where appropriate.*

**Comment:** we hope that all assistance will be given in the remediation of the contaminated land of the ex-Monsanto site at the heart of our community. So that it can be put to **GOOD USE** for the benefit of our community, Wrexham County and North East Wales.

Remediation is the responsible action, rather than just ignoring the problem and hoping for the best. Remediation of the site will comply with the initial statement:

*Sustainability means treating the earth with respect so that it is in a healthy state for future generations. It also means making wise and sometimes challenging decisions in order to achieve positive benefits in economic, social and environmental terms.*

**This does not mean fencing it off and forgetting about it.**

- *The quality of our groundwater, rivers, lakes and coastal waters is maintained and enhanced.*

This has to be maintained and a responsible remediation program for the ex-Monsanto works site is a step in the right direction to isolating and establishing known barriers against water pollution of both the Dee River and the Llangollen Canal, both sources of drinking water for Wrexham and the Cheshire plain.

### Planning Policy Wales edition 6 (PPW 2014)

*Provide for the conservation and, where appropriate, enhancement of biodiversity and landscape outside designated areas, in particular identifying opportunities to conserve important local habitats and species, and to safeguard and manage landscape features of major importance for nature conservation or amenity.*

*Make appropriate provision for Local Nature Reserves and country parks and include, where appropriate, locally-specific policies for conserving native woodland and protecting and planting trees.*

*Clarify how biodiversity will be safeguarded outside statutory designated sites without unduly restricting development that is otherwise appropriate.*

*Provide for the protection and enhancement of open space of conservation value, seeking to identify opportunities to promote responsible public access for enjoyment and understanding of the natural heritage where this is compatible with its conservation and existing land uses.*

*Recognise the potential of, and encourage land uses and land management practices that help to secure carbon sinks.*

**Comment:** hopeful these policies can be applied to the ex-Monsanto site to help reclaim this Brownfield site back for a useful contribution to our community and the surrounding countryside. This would promote the re-introduction of wildlife within the open public space with the FULL reinstatement of the Plas Kynaston Canal, tree planting and appropriate landscaping.

The idea of simply fencing off the site indefinitely at the heart of our community that has a potential flood plain running through the centre leading to a major water course and immediately adjacent to a World Heritage Site and AONB is NOT TO BE PERMITTED.

Although the PKC Group is quite willing to work with the site owners for the remediation of the site and turning the site around, they will not agree to the site being maintained as is at the cost of our community. That would simply be selling out our community of the Cefn and Cefn Mawr.





The current barren concrete landscape of the former ex-Monsanto works, a brown field site in need of remediation at the centre of the community of The Cefn, immediately adjacent to the aqueduct.

**How any one can pretend to ignore this and talk about just fencing it off indefinitely is beyond us?**

*Local planning authorities should take into account the nature, scale and extent of contamination which may pose risks to health, new development should not be undertaken without an understanding of risk, or remediation, the impact of remediation on the natural and historic environments should be considered (PPW 13.6).*

*Where appropriate, development plans should indicate the general location of known areas of contamination and may also include specific proposals for sites known to be contaminated or where the site history suggests a risk of land contamination or the land is designated as contaminated under Part 2A of the regulations (PPW 13.6.2).*

*Plans may indicate that the local planning authority will need to be satisfied that any actual or potential contamination can reasonably be overcome. Policies for the rehabilitation and development of existing polluted land and derelict sites should also be included.*

**Comment:** The PKC Group have been doing this for the past five years and now propose a number of recommendations for inclusion in the LDP2. These will help turn this site around from the current eye saw that it is, to a setting and land use that will be suitable for the Pontcysyllte WHS and will help support the community of the Cefn and Cefn Mawr in compliance with all the goals and objectives of the LDP2.

### Green Belt:

*The purpose of a Greenbelt is to is; prevent the coalescence of large towns and cities with other settlements; manage urban form through controlled expansion of urban areas; assist in safeguarding the countryside from encroachment; protect the setting of an urban area; and assist in urban regeneration by encouraging the recycling of derelict and other urban land (PPW 4.8.3).*

*The construction of new buildings in a Green Belt or in a locally designated green wedge is inappropriate development unless it is for the following purposes: justified agricultural and forestry needs; essential facilities for outdoor sport and outdoor recreation, cemeteries, and other uses of land which maintain the openness of the Green Belt or green wedge and which do not conflict with the purpose of including land within it; limited extension, alteration or replacement of existing dwellings; limited infilling (in those settlements and other development sites which have been identified for limited infilling in the development plan) and affordable housing for local needs under development plan policies; or small scale diversification within farm complexes where this is run as part of the farm business (PPW 4.8.16).*

*Other forms of development would be inappropriate development unless they maintain the openness of the Green Belt or green wedge and do not conflict with the purposes of including land within it (PPW 4.8.17).*

**Comment:** how will this policy be implemented regards the planned car park extension under the SPL plan at the Trevor Basin into a green field when there is a suitable Brownfield site immediately adjacent? Also has this been considered with the recent planning application for another retail park on the A483 at the Ruabon roundabout? This will remove further green belt land as that is what it is planned to be built on, weather designated as such or not between Ruabon and Cefn Mawr.

### Technical Advice Note 5: Nature Conservation and Planning (2009)

*Plan to accommodate and reduce the effects of climate change by encouraging development that will reduce damaging emissions and energy consumption and that help habitats and species to respond to climate change (PPW 2.2.1 and 2.3.2)*

*Development policies and, where appropriate, supplementary planning guidance, should promote opportunities for the incorporation of wildlife and geological features within the design of development and green infrastructure (PPW 2.9.4).*

**PKC Group Proposals** agree and comply with these statements fully.

*Protect ancient woodlands, veteran trees and other trees of nature conservation value.*

*Encourage the conservation and management of features of the landscape of major importance for wild flora and fauna.*

*Give local expression to the protection and, where possible, enhancement of species and their habitats, especially those with legal protection and those of principal importance for biodiversity conservation in Wales.*

**PKC Group Proposals** agree and comply with these statements fully.

### Woodland for Wales (2011)

*Woodlands and trees are used more creatively in new development and in the restoration of industrial sites to provide people with better quality, easily accessible green space.*

*Improve access to urban woodlands, especially for people who currently do not have easy access to green spaces.*

*Ensure that the environmental benefits of trees in modifying microclimate and drainage are taken into account in planning guidance and development control, and when creating sustainable urban drainage systems.*

*Promote the contribution that urban woodlands and trees could make to other policy agendas, including those which concern climate change, health, social welfare, lifelong learning and biodiversity, and the management of water and soil resources.*

*In our parks, gardens, towns and countryside, individual trees, and particularly veteran trees, are better managed for their biodiversity, landscape, heritage and cultural value.*

*Woodland cover is to increase at a national level.*

**PKC Group Proposals** agree and comply with these statements fully and in fact maintain two urban woodland areas for the community and biodiversity. A large proportion of the trees in the Cefn and Cefn Mawr were planted in the 1980's as a part of the plant a tree program at that time and have now reached maturity.

*Trees play an important role as a carbon sink and can help regulate our climate, with large trees disproportionately storing more carbon. Protection of existing trees and planting new trees resilient to climate change is a way of combating climate change. Development is a major threat to trees and woodlands, however much of the threat to trees comes from development outside of the planning system.*

*The drive to reduce carbon emissions produces tensions with Air Quality as the amount of Oxides of Nitrogen (NOx) produced by petrol and diesel fuelled engines increases as carbon emissions are reduced. This is a significant problem for air quality in congested town centres and around major roads and points to the need for balance in evaluating proposed solutions, this is potentially significant for Wrexham.*

### Climate Change:

*There is uncertainty about the impacts of climate change, but the UK Climate Change Impact Programme (UKCIP) has modelled a number of scenarios based on different emission projections. In general terms, the model suggests that Wales can expect:*

- *Hotter average temperatures and an increase in the number of hot and dry summers, and an increase in the number of extremely hot days.*
- *Milder winters and a reduction of snowfall.*
- *Increase in winter rainfall and in the frequency of intense rainfall resulting in river and coastal flooding*
- *Increased pressure on sewer systems and increases in winter storm damage*
- *Habitat and species loss, for example in uplands and wetlands*
- *Summer water shortages and increased incidence of low river flows (coupled with higher demand)*

- *Anticipated implications of climate change, such as heavy downpours will increase the risk of subsidence, a risk of erosion and cause the loss of nutrients from soils*
- *Hotter, drier summers will impact on the growing seasons, resulting in changes to agricultural production.*
- *Increasing thermal discomfort in buildings and health problems in summer, including heat-related deaths linked to high air pollution*

*Climate change has the potential to negatively affect the borough's ecology, habitats, trees and woodlands. Ecology is sensitive to the environmental conditions that arise from the climate; sunshine hours, temperatures, seasonal variations, soils, rainfall etc all interact to create an environment supporting native ecology. Changes in climate, summer droughts are predicted to increase in eastern Wales with more incidents of extreme weather, will change the subtle interactions within the environment and threaten native ecology.*

*Climate change also has the potential to increase the numbers and types of problematic pests & diseases, with increased activity of pests in the summer and decreased mortality during the winter. The recent sudden influx of exotic pests and diseases in Britain, including oak decline and red band needle blight on pines may be attributed to recent climatic changes in the UK.*

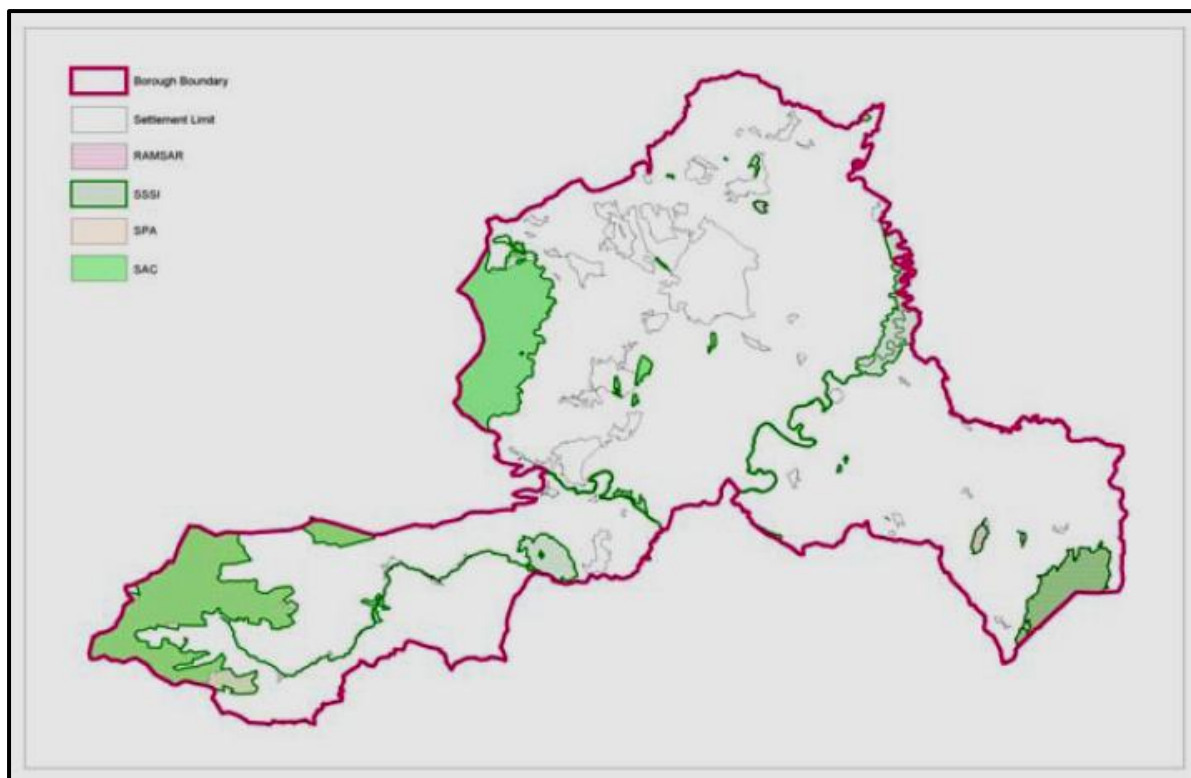
### Biodiversity and Conservation

*Biodiversity in Wrexham County Borough possesses an extremely rich and varied array of habitats and species. There is incredible diversity resulting from differences in soils, topography, land use and legacies of the past. To the west, the open moorland of the Ruabon and Esclusham Mountains are a valuable habitat for several important bird populations including the most important site for black grouse in Wales. The River Ceiriog Valley and surrounding Berwyn Mountains are a patchwork of small farms, woodlands, open moorland and scrub. In the eastern lowland areas of the borough including the River Dee and its floodplain, extensive areas of floodplain meadow support an array of breeding birds, insects and small mammals. The extremely dense occurrence of ponds in the lowlands is of European importance and essential for the protection of the great crested newt population. Fenns, Whixall and Bettisfield Moss National Nature Reserve, once formed part of a huge lowland raised bog site which developed after the last glaciation. The peat body supports dozens of locally and nationally rare species and is of European importance.*

### Designated Habitats in the County of Wrexham

- *River Dee and Bala Lake SAC*
- *Berwyn SPA, Berwyn and South Clwyd Mountains SAC*
- *Johnstown Newt Sites SAC*
- *Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses SAC*
- *Midlands Meres and Mosses (Phase 2) Ramsar site*





### River Dee and Bala Lake SAC

*Current issues, some stretches have been canalised, altering the natural habitats. Elsewhere, embankments have been increased to act as flood barriers, and some are collapsing into the river, particularly affecting migrating and spawning salmon. One of the main concerns is that high nutrient levels are entering the river via licensed discharges and agricultural run-off. The river is affected by impacts over a geographically large area and has numerous tributaries that also transport nutrient enriched water into the main river. The Dee provides water resources for its own catchment area and also for parts of the West Midlands and North West of England. Consideration of water abstraction and water quality should be made with regards to future LDP growth levels. Disturbance could be an issue at locations of intensive recreational use. New housing close to the river could disturb otters. Siltation from construction close to the river and its tributaries is also a potential source of pollution. Invasive and non-native species are increasing within the SAC, including Chinese mitten crab *Eriocheirsinensis*, signal crayfish *Pacifastacusleniusculus* and zebra mussel *Dreissenapolymorpha*.*

*Requirements to resolve current issues and prevent further adverse effects*

*The main concern relates to nutrient enrichment, with the River already being adversely affected by increasing nutrient levels. The review of consents by the Environment Agency Wales will make a significant contribution to the management of nutrient levels, but the Local Development Plan should ensure that nutrient levels are not exacerbated by new development.*

*Prevention of siltation via appropriate management of construction, and the assessment of the current state of embankments along the river by Environment Agency Wales will also assist in the management and protection of the SAC. Project level protected species surveys and assessment for developments in close proximity to the river and its tributaries should include the potential effects on otters.*

*Other non-Local Development Plan initiatives could include redirecting recreation toward the more altered sections of the river, in order to protect the more sensitive locations; and strategies for the control of non-native species.*

### Sites of Special Scientific Interest in the County of Wrexham

- *River Dee,*
- *Ruabon/ Llantysilio Mountains and Minera*
- *Pandy Quarry, Berwyn*
- *Chirk Castle Parkland and Vicarage Moss*
- *Hanmer Mere*
- *Llay Bog,*
- *ChawwarelSingret*
- *LlynBedydd*
- *Shell Brook Pastures*
- *Cloy Brook Pastures*
- *Marford Quarry*
- *Sontley Marsh, Fenns, Whixall, Bettisfield, Wem and Cadney Mosses*
- *Nant Y Belan and Prynella Wood*
- *Stryt Las A'rHafod / Johnstown Newt Site*
- *Gatewen Marsh*
- *Old Pulford Brook Meadows*

### Habitat Connectivity, Green Infrastructure and Wildlife Corridors

*Connectivity is a measure of the size and distribution of patches of habitat and the relative ease with which typical species can move through the landscape between the patches. Maintaining and improving connectivity is important in ensuring the long-term survival of biodiversity in a fragmented landscape, especially under a changing climate.*

*Patches of habitats can include protected habitats but can also include foraging/roosting/breeding habitats and features such as veteran trees, hedgerows, old buildings etc. They can also include a patchwork of landscape features that fall under the umbrella term of Green Infrastructure, this is a network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect villages, towns and cities.*

*Well connected, good quality green infrastructure is important because it can help enhance our quality of life, provide access to natural green spaces, manage flooding and pollution, support wildlife and form corridors that allow species to move between important habitats. The provision of linkages between habitats and to adjacent areas is increasingly important as species face additional pressures from impacts of climate change.*

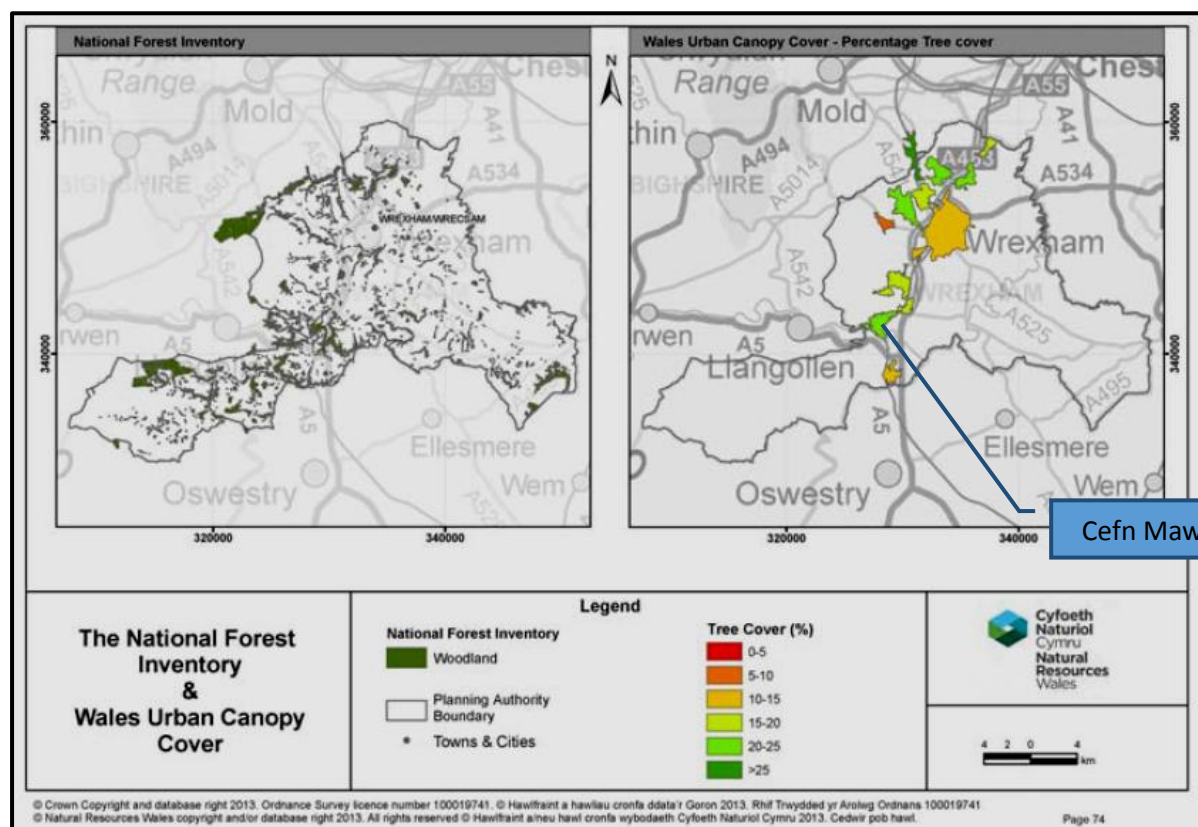
*Consideration should be given to maintaining and enhancing connectivity between habitat types and the removal of barriers to migration e.g. migration routes of eels. Consideration should also be given to risks to Habitats as 'biodiversity' are not restricted to natural habitats but may include structures and other features e.g. mines.*

## Trees

*Trees contribute to local character and landscape and are a fundamental element of good design. They contribute to people's quality of life and sense of wellbeing, provide a habitat for wildlife, help provide natural green spaces encouraging active lifestyles, produce oxygen, store carbon, intercept and absorb rainfall thereby reducing flood risk, absorb pollutants which help in reducing the causes of respiratory illnesses, filter noise, provide shelter and shade moderating the 'heat island' affect and help alleviate heat related premature deaths.*

*Trees are often the dominant features of green space; their stature and beauty help define urban spaces. A study by the Council of publically accessible open space in Wrexham reveals that a high proportion of spaces are of low naturalness. The planting of trees is one of the ways of increasing the naturalness of the County Borough's urban public open spaces thus improving quality of place and encouraging use of the spaces.*

*A survey of tree canopy cover gives an indication of whether tree coverage is increasing or is on the decline, this is of particular relevance in urban areas where trees and the planning system have the greatest interaction. The 2009 figures show that the average canopy cover percentage for urban areas in Wrexham County Borough is 13.9% of the urban land mass, which is 0.3% decrease from the 2006 average urban canopy cover figure.*



**Note:** Cefn Mawr has a high percentage of woodland canopy cover within its urban boundary and this is largely due to the National Campaign of Plant a Tree in the 1980's lead locally by the Wrexham County Borough Council to gain the government grant funding for such. This transformed the rundown and barren landscape of Cefn Mawr into a much more green area that now represents one of the highest wooded urban areas in the county. This needs to be taken into account as an asset to the area and indiscriminate removal of trees curtailed.

## Trees – Ancient, Veteran & Notable.

*Ancient, veteran and notable trees provide important habitat, are the biggest of their species, and may have important historic or cultural associations such as historic parkland.*

*Notable trees of special interest include the ancient yews at Llanermon Dyffryn Ceiriog, Gresford and Overton, with the latter being listed as one of the Seven Wonders of Wales, the ancient “Oak at the Gates of the Dead” in the Ceiriog Valley, the “Broad Oak” in Acton and a number of veteran and notable trees on the Wynnstay Estate near Ruabon, including a large rare yellow-leaved English Oak. Some of the ancient yew trees in the County Borough are well over a thousand years old and the Pontfadog Oak is believed to have been an old tree in 1165 when nearby Owain Gwynedd’s forces and King Henry II armies fought the battle of Crogen.*

## Trees – Ancient Woodland

*Ancient Woodlands are areas that are believed to have had a continuous woodland cover for at least 400 years. Studies show that ancient woodlands are typically more ecologically diverse and have a higher nature conservation value than those that have developed more recently or those where woodland cover on the site has been intermittent. They may also be culturally important and have historical and archaeological significance because of low levels of disturbance. Ancient Woodlands are a finite resource which cannot increase so what remains is precious and irreplaceable and should be protected.*

*An inventory of ancient woodland undertaken in 2011 by Forestry Commission Wales reveals that there are 1,846 hectares of ancient woodland in the County Borough. This is approximately 3.7% of the County Borough’s land mass and is just under 2% of the ancient woodland in Wales, which totals 95,000 hectares. Of the 1,846 hectares of ancient woodland 763 ha are ancient semi-natural woodland, 95 ha is ancient semi-natural woodland of unknown origin, 313 ha is plantations on ancient woodland sites, with the remaining 675 ha being restored ancient woodland sites.*

**Comment,** it would be good to link the ancient woodland of Tan y Cut Woods on the south bank of the River Dee to the Ty Mawr Country Park on the north side of the river as was originally planned in



the 1980's when the country parks were set up. This would then provide a circular walk along the Canal and River Bank between the Pontcysyllte Aqueduct and the Cefn Viaduct. This would help encourage people visiting the aqueduct to explore a wider area.



## Water Resources

*Water is precious and is a basic need essential for life. It's also vital to the economy; it is used in our homes, to generate power, run industries, and to grow food.*

*The future for water in Wales is uncertain. Increases in population and changes in lifestyle, together with climate change, mean that we need to plan for the next 40 years and beyond. If we don't, our society faces the real possibility of not having enough water for people and the environment.*

*In Wales it is Natural Resources Wales's responsibility to decide how much water is taken from the environment for human and business use, without compromising the environment. They also deal with all aspects of water such as managing abstraction, flood risk and water quality, and are able to look at the water environment in its entirety. Working in this way allows them to address the needs of society, businesses and the environment.*

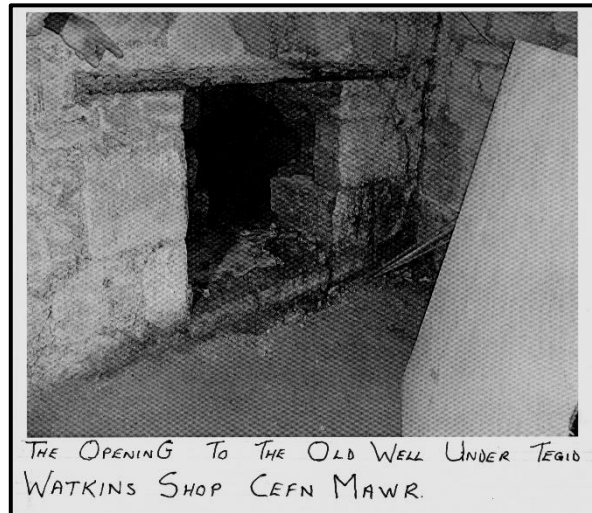
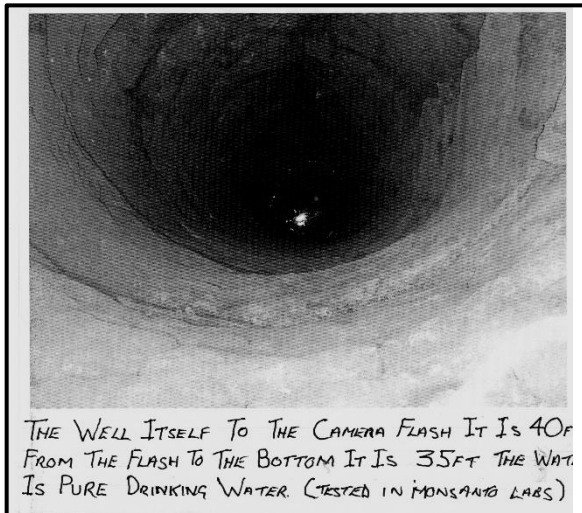
## Water Framework Directive, River Basin Districts & River Basin Management Plans

*The Water Framework Directive (WFD) establishes a framework for the protection of surface waters (rivers, lakes, estuaries and coastal waters) and ground waters. It requires NRW to achieve 'good' statuses in all water bodies by 2027; this means that the qualities of water bodies to support natural biological communities are free from pollution.*

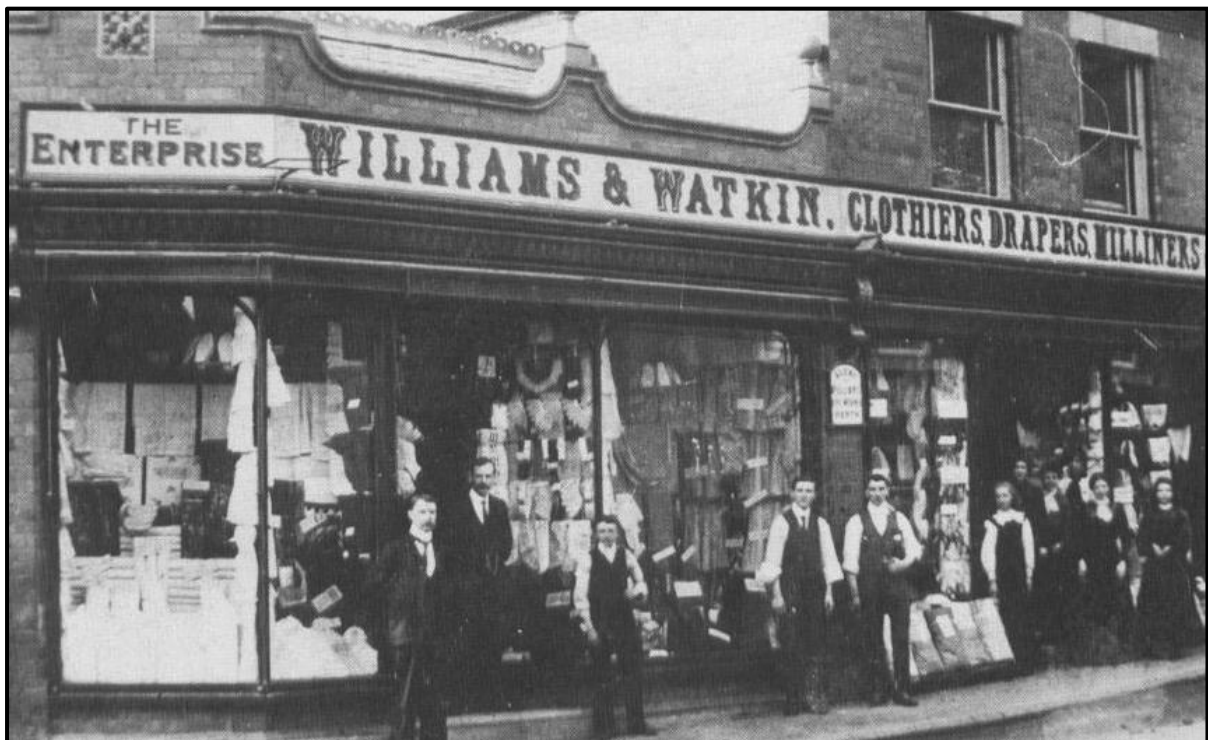
*River Basin Management Plan's (RBMP) are the tool by which NRW deliver the aims of the WFD. The majority of the County Borough falls within the River Dee RBMP which forms much of the evidence base for this section and a small part within the Severn River Basin. The aim of the first Dee RBMP is to achieve 50% of all water bodies achieving good or better status by 2015.*

*The WFD classifies waters according to their ecological and chemical statuses replacing the previous General Quality Assessment scheme. The WFD assessment considers over 30 elements grouped into ecological status (this includes biology as well as phosphorous and PH) and chemical status ('priority substances' such as mercury).*

## Cefn Mawr and Watkins Well

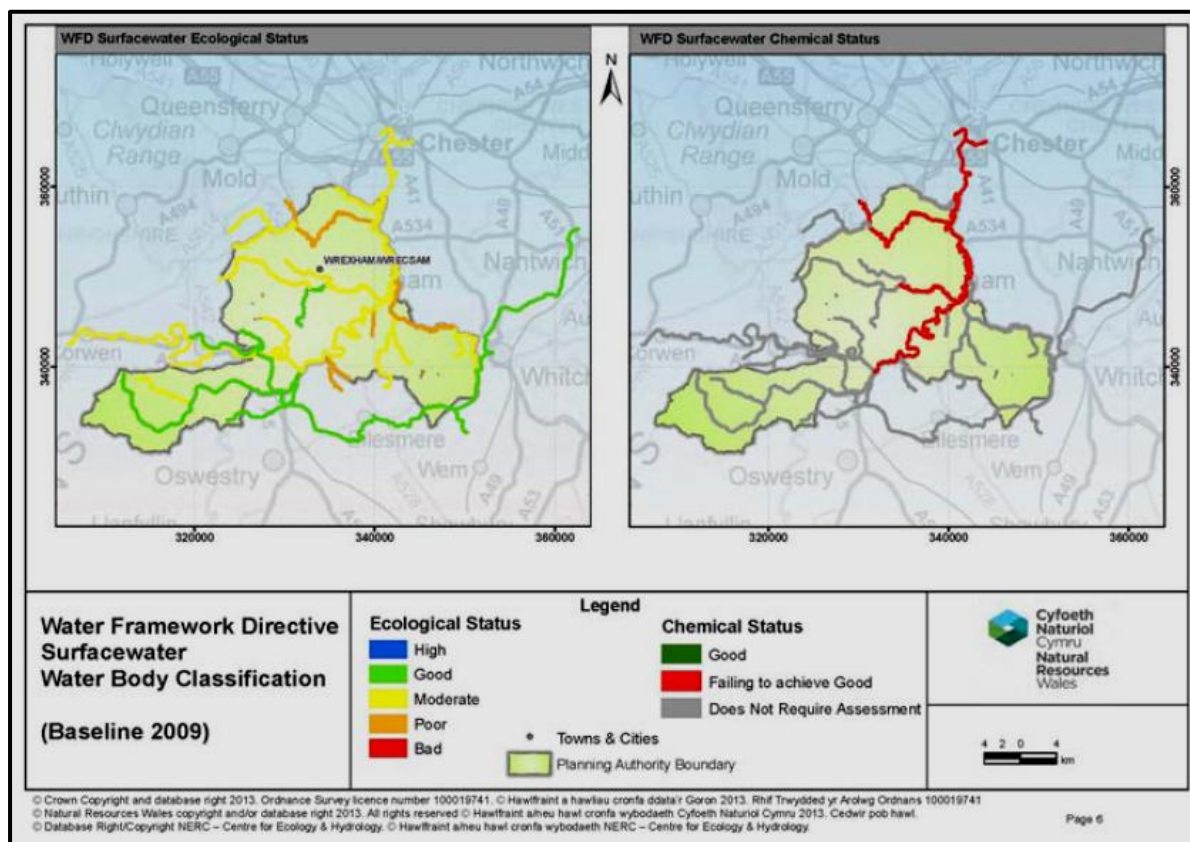


Cefn Mawr is built on a sandstone ridge and is a relatively dry area having no natural running water. The nearest sources are Trefynant & Abernant Brook to the west and Rhosymedre Brook to the East. Therefore wells were sunk and it just so happens that Well Street in Cefn Mawr starts at the Cefn Square. Below the Enterprise Store, Watkins Well can still be found. No doubt the well assumed the name of the shop above it. This actually formed a part of the adit system for what was the Cefn Colliery. Most adits are designed to slope slightly upwards from the entrance so that water will flow freely out of the mine.



Mr Williams and Mr Watkins with their staff outside the shop in 1905, indicating the business they were doing at that time. As young men they had worked together in Birmingham and Williams who was from the Cefn persuaded Watkins to set up business with him in the busy colliery area.

## Water Framework Directive and Chemical Contamination



**Question:** why do the chemical contaminations only appear at the confluence of the Ceiriog River with the Dee River? The Ceiriog River is relatively clean so should not be the source of contamination unlike some of the sites further upstream on the River Dee which could be contributing to the chemical contamination, such as the ex-Monsanto Chemical Works?

Trefynant Brook runs through the site before entering the River Dee and the storm drains for the site empty out into the River Dee.

Water Framework Directive: Surface Water Status (% in each class)					
Ecological Status			Chemical Status		
	Wrexham	Wales		Wrexham	Wales
Bad	0%	0.3%	Fail	100%	22%
Poor	19%	8%			
Moderate	45%	63%			
Good	35%	29%	Good	0%	78%
High	0%	0%			

The contamination of the River Dee is causing a 100% failure against the 2009 base line figures, which then gives a very high failure rate against Wales as a whole, i.e. 78% above the national average.

Water Resources - Surface Water Status (Chemical) – Indicator 5.12	<div>Wrexham Wales</div> <div>Fail 100% 22%</div> <div>Good 0% 78%</div> <div>No deterioration from the baseline, achieve good by 2015/2021/2027</div> <div>NRW Local Evidence Pack 2013 Baseline data 2009</div>		There could be many reasons for failure, abandoned mines and contaminated land, acidification, agriculture, industrial discharges, natural conditions, septic tanks, sewage discharges and urban development.
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## Reasons for Failure for Water Bodies in Wrexham

*Natural Resources Wales have analysed all the reasons for failure to identify the main issues impacting on the water environment. Responsibility for rectifying these issues rests with land managers, farms, businesses, water companies, government bodies, local communities and planners. The top five reasons for failure that Planning Authorities can and should address through the planning process are:*

*Barriers to Fish migration – Ensure that planning applications that include impoundment are compliant with the WFD.*

***Abandoned Mines and Contaminated Land – Ensure that risks posed to groundwater from land contamination are mitigated and remediation is put in place where necessary.***

*Sewage Discharges – ensure via the LDP that sufficient sewage capacity exists for current and future needs; work with NRW to ensure planning applications do not impact negatively on water quality; work with NRW to plan for the long term sewerage and development pressures.*

*Flood Protection and Land Drainage – ensure that existing and proposed flood protection structures and operations incorporate mitigation; locate new development outside of flood plains; managed re-alignment of flood defences delivers environmental improvements where appropriate and ensure new SUDS deliver solutions for the management of surface water quality and quantity.*

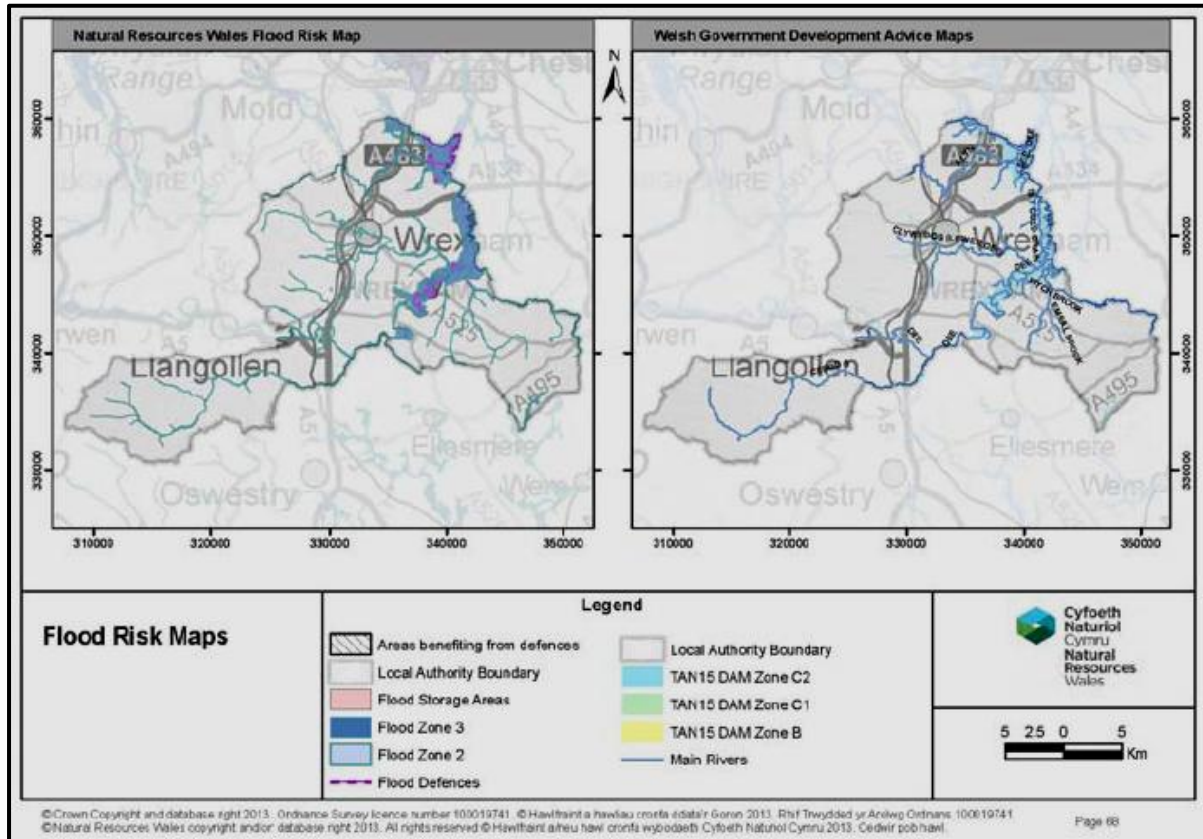
*Urban and Transport Development – identify opportunities to restore urban rivers e.g. by removing redundant weirs and reinstating riparian habitat and trees; address diffuse pollution; ensure planning decisions take regard of the RBMP and support the delivery of environmental improvements.*

*Future demand for water will be driven by changes in climate and pressure from development and growth. Population growth is likely to remain the most significant driver for change in household demand for water through to the 2050s. EAW have modelled growth, forecasts indicate that there is likely to be a slight decline in total demand for water in Wales from 2008 to 2018. The decline is driven by a reduction in per capita consumption (pcc), and industrial and business use, which offsets the forecast growth in population. Beyond 2020 the picture is less clear with wildly conflicting implications for water use.*



## Flood Risk

Flood risk is the combination of two components; the likelihood (or probability) of a particular flood event occurring and the consequence (or impact) that the flood event would have if it occurred. The sources of flood risk are river flooding, tidal flooding, surface water flooding, sewer flooding and groundwater flooding.



Surface water flooding occurs following intense rainfall, which due to the large volume of water exceeds the ability of the drainage system to cope leading to localised flooding. The PFRA identified that surface water flooding was the most prominent cause of flooding for Wrexham County Borough.

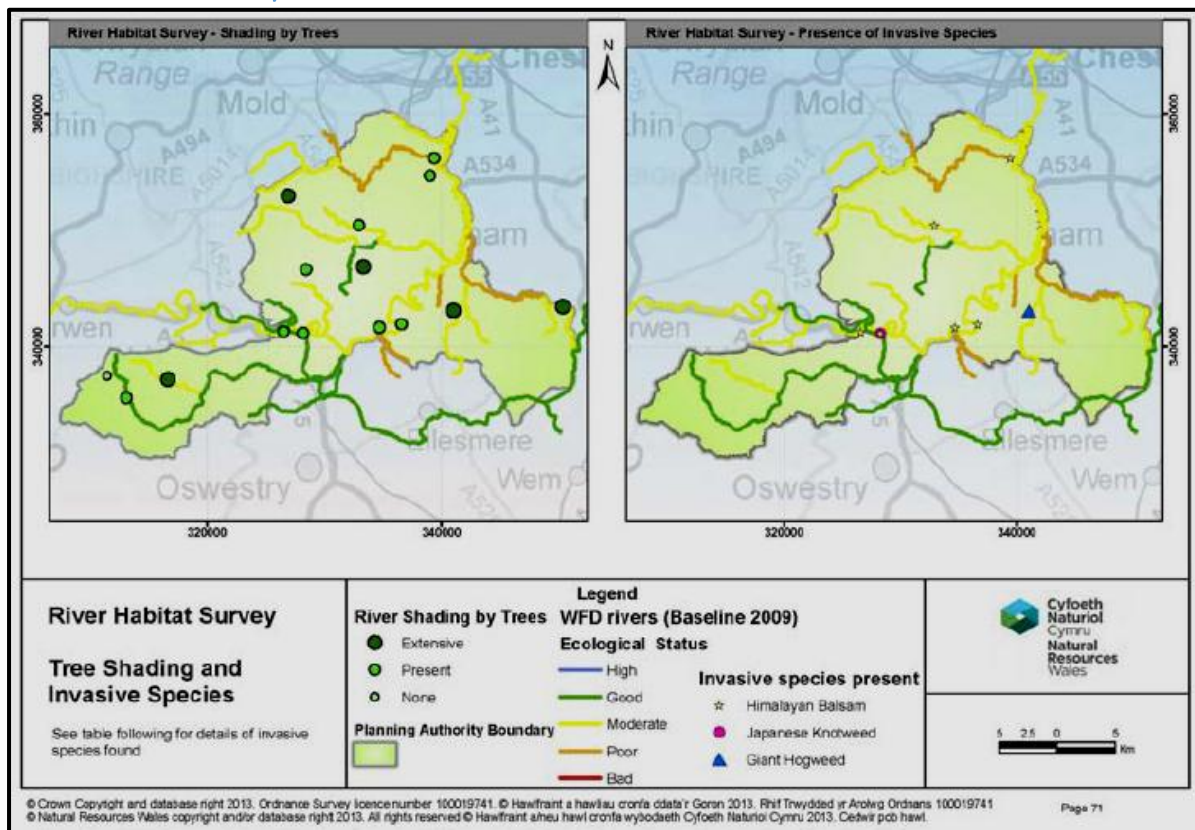
These areas are concentrated around Wrexham, Llay Industrial Estate, Wrexham Industrial Estate and urban villages of Gwersyllt, Rhosllanerchrugog, Ruabon, Coedpoeth, **Cefn Mawr**, **Acrefair**, Chirk and Glyn Ceiriog, Ceiriog Valley.

Areas within the C2 flood risk zone are parts of Wrexham, Bangor, **Cefn Mawr** and New Broughton.

**Comment:** the flooding in Cefn Mawr & Acrefair is due to run off from the former Delph open cast colliery works where ground drainage is now poor causing surface drainage along the Llangollen Road (A539). This limited flooding is restricted to a relatively small area.

The major water course in the area is the River Dee and although levels of the river Dee can rise all the villages of the Cefn are situated well above the water line apart from the hamlet of Cysyllte and a few houses at New Bridge.

## River Habitat Survey



The RHS survey provides an assessment of the physical character of river habitats and assesses changes to it. The Habitat Modification Class (HMC) is based on an assessment of the presence and extent of artificial modifications. Where there are long stretches of reinforcement or re-sectioning, the river is less likely to be able to offer habitats for wildlife.

**Riverside trees and shading** - Trees are an important feature of river channel and riparian habitats, they help to protect banks from erosion, act as habitats, they help provide suitable shelters for wildlife and provide shading.

**Invasive non-native plants on river banks** - RHS collects data on three invasive non-native plants - Himalayan balsam, Japanese knotweed and giant hogweed. These plants can cause problems by displacing the natural plant species and also causing bank erosion when they die in winter. As RHS only records plants growing by the riverside, the results only show their distribution in riparian habitats.

## Salmon

The River Dee is a principal river for Salmon (a protected species) the population of which in the Dee are considered to be at risk due to fishing, water quality/quantity, river channel structure and siltation, and in river obstructions to migration.

## Air Quality

*Good air quality is important for human health, wildlife, soils, water quality and the wider environment. Compared to around 50 years ago environmental air quality nationally is generally very good. However, serious health problems such as respiratory, cardiovascular illness and even premature death can also be associated with air pollution. It is estimated that there are over 32,000 premature deaths in the UK each year from air pollution. The effects are most commonly felt by sensitive and vulnerable groups such as the infirm, people with asthma, children and the elderly. It is also often the case that those living in deprived areas suffer the worst air pollution.*

**The Cefn & Cefn Mawr** has had more than its fair share of air pollution over the past sixty years and was known for such. The place stank. H<sub>2</sub>S, Hydrogen Sulphide emissions from the Monsanto Chemical works did nothing for the health of the local population.

Signs of H<sub>2</sub>S pollution at low levels 0 – 10ppm are:

- Bad egg smell
- Irritation to the eye
- Nausea
- Headaches

**H<sub>2</sub>S is a toxic gas** and is lethal in high doses, every Sunday the ex works used to test the warning siren which if sounded at any other time was a signal to go indoors and hide from the gas cloud. Furthermore in addition to H<sub>2</sub>S releases there was a large Chlorine plant in the works and chlorine gas became famous for its use in the trenches during the First World War.

## Nitrogen Oxides (NO and NO<sub>2</sub>)

*Nitric oxide (NO) is mainly derived from road transport emissions and other combustion processes such as the electricity supply industry. NO is not considered to be harmful to health. However, once released to the atmosphere, NO is usually very rapidly oxidised to nitrogen dioxide (NO<sub>2</sub>), which is harmful to health. NO<sub>2</sub> and NO are both oxides of nitrogen and together are referred to as nitrogen oxides (NO<sub>x</sub>).*

*Nitrogen dioxide can irritate the lungs and lower resistance to respiratory infections such as influenza. Continued or frequent exposure to concentrations that are typically much higher than those normally found in the ambient air may cause increased incidence of acute respiratory illness in children.*

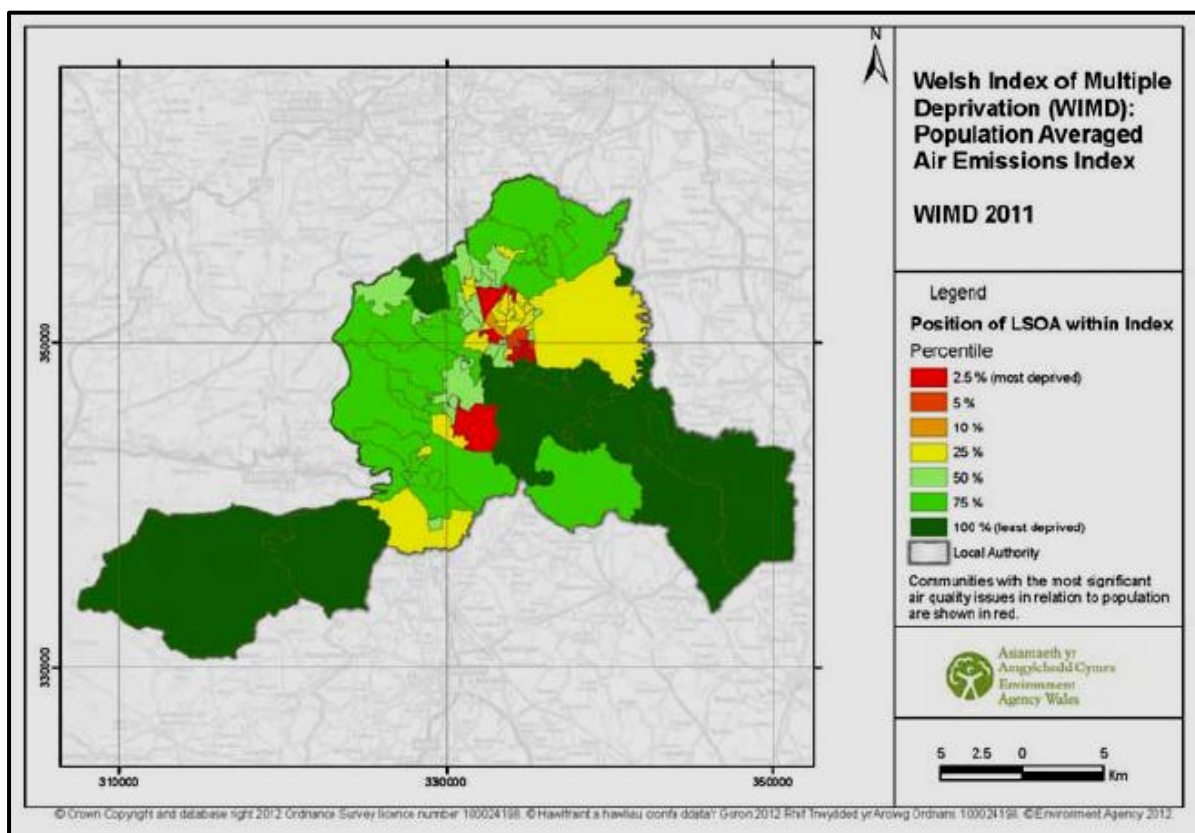
*High levels of NO<sub>x</sub> can have an adverse effect on vegetation, including leaf or needle damage and reduced growth. Deposition of pollutants derived from NO<sub>x</sub> emissions contribute to acidification and/or eutrophication of sensitive habitats leading to loss of biodiversity, often at locations far removed from the original emissions. NO<sub>x</sub> also contributes to the formation of secondary particles and ground level ozone, both of which are associated with ill-health effects. Ozone also damages vegetation.*

*The current UK National Air Quality Strategy objectives for nitrogen dioxide are a concentration of 200 µg m<sup>-3</sup> measured as a 1 hour mean not to be exceeded more than 18 times a year and an annual mean of 40 µg m<sup>-3</sup> not to be exceeded. There are no AQM areas in the county borough.*

### Welsh Index of Multiple Deprivation: Air Quality

Air quality is believed to be a good proxy measure of the quality of the surrounding environment. Poor air quality suggests proximity to certain activities such as traffic, domestic combustion and industrial sites – activities that could have a negative impact on quality of life, the local environment and health. The Air Quality indicator uses data on concentrations of pollutants (benzene, nitrogen dioxide, sulphur dioxide, particulates, carbon monoxide and ozone) and Air Quality Management Area data.

Air quality is the preferred measure of risks from air pollution but air emissions data provides a good set of complementary data covering pollutants that are not included in the Air Quality indicator. Emissions data are good indicators of proximity to polluting activities. The map below identifies areas where communities are suffering deprivation caused by air emissions, with the red areas the most deprived.

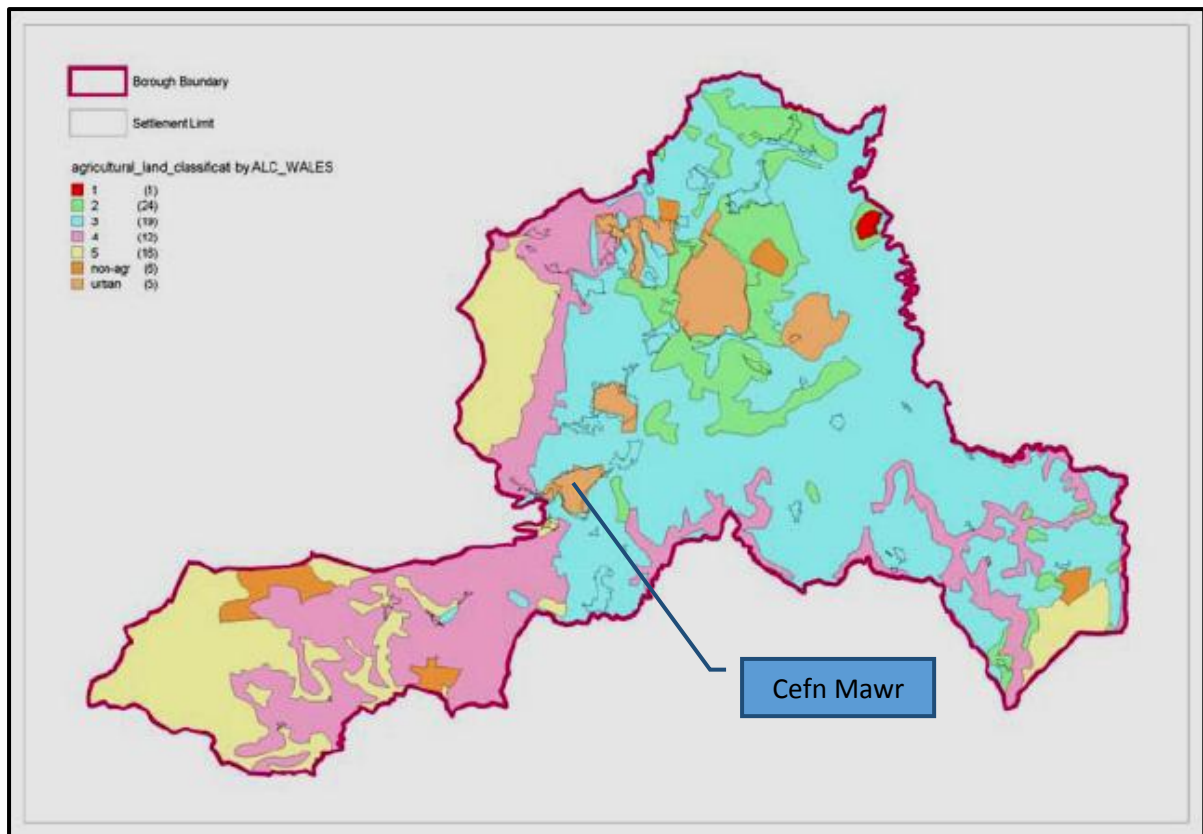


### Agricultural Land

The Agricultural Land Classification provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. The classifications are based on the long term physical limitations of land for agricultural use. Factors affecting the grade are climate, site and soil characteristics and the important interactions between them.

Land is classified into 5 grades. The best and most versatile agricultural land is defined as grades 1, 2 and 3a by Planning Policy Wales. This is the land which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals. National, policy supports the protection of the 'best and most versatile' agricultural land which should only be developed if there is an overriding need and either previously developed land or land from lower agricultural grades is unavailable or available lower grade land has an environmental value that outweighs the agricultural considerations.





**Cefn and Cefn Mawr** and all the proposals for the area by the PKC Group do not intrude on any Greenbelt land or open green spaces within the community and the Cefn is indicated as urban on the above map of Agricultural Land Classification by the Welsh Government for the County of Wrexham.

### Soil Function

*Soils are the biggest store of carbon in the world and have an important role to play in nature in terms of carbon sequestration, flood alleviation, hosting species as well as having agricultural value. The integrity of soils is affected directly by such things as dumping waste and indirectly via emissions. Much of Wrexham's soil contamination is historical, however, pollutant loading from wastes applied to land continues, along with the deposition of atmospheric pollutants. The main effects are nutrient enrichment, acidification, organic contamination and pathogen contamination.*

### Derelict land

*Wrexham County Borough is a largely urbanised area with a legacy of historical industrial land uses, consequently it has many Brownfield sites. **These sites have the potential to become a valuable resource for local communities and the borough as a whole.** Bringing derelict land and other previously developed land back into use is also a key way of reducing the demand for building on 'green field' land, but such sites are usually more expensive to develop.*

### Soil - Land with Contamination

*The Contaminated Land (Wales) Regulations, 2006 sets out a regime to deal with contaminated land.*

***The Regulations place a duty on all local authorities to inspect land in their area to identify and remediate sites where contamination is causing unacceptable risks to human health and/or the wider environment using the risk assessment approach.***



*A number of sites have been assessed but none meet the Regulations definition of 'contaminated land'. Land with contamination is different under the Regulations and Planning Policy to contaminated land, the latter has a strict meaning in the Regulations while the former is discussed below.*

*The county borough has a legacy of land contamination resulting from previous heavy industrial uses (e.g. mining, steel making, tanning) and more recent industries (e.g. **munitions and chemicals**), this land is spatially distributed in the areas associated with these industries, urban areas, industrial estates and the **western villages**.*

*Land with contamination does not necessarily pose a risk to humans or the environment. It is therefore not always necessary to remediate land with contamination. In fact land contamination often only creates a problem when the land is used for an unsuitable purpose and/or the contamination is so significant it is affecting controlled waters or adjacent land and/or receptors such as people and animals.*

*Development may open up pathways for contamination to affect people, controlled waters, animals and flora. Consequently land which has a potentially contaminative historic use, may require a Phase 1 Preliminary Risk Assessment to ensure land is suitable when developed and is managed effectively. **Depending on the findings of the Phase 1 Preliminary Risk Assessment planning consent may require a Phase 2 intrusive investigation and a scheme of remediation.***

**This is the ex-Monsanto site at Cefn Mawr** and an intrusive survey has already been conducted. This is a contaminated site in the middle of a community immediately next to the Pontcysyllte Aqueduct at the central section of the Pontcysyllte World Heritage Site. The site also lies immediately adjacent to the Dee Valley AONB in the Vale of Llangollen.

If this site is not remediated and redeveloped appropriately this will go against all the aspirations of the LDP2 and directives of the Welsh Assembly Government in the present round of Local Development Planning?

**The Environmental Protection Act 1990 states the Local Authority is obliged to identify the appropriate person responsible. In a case where the polluter cannot be found or is no longer in existence the Act states that the liability for the clean-up or remediation lies with the current land owner or occupier of the land.**

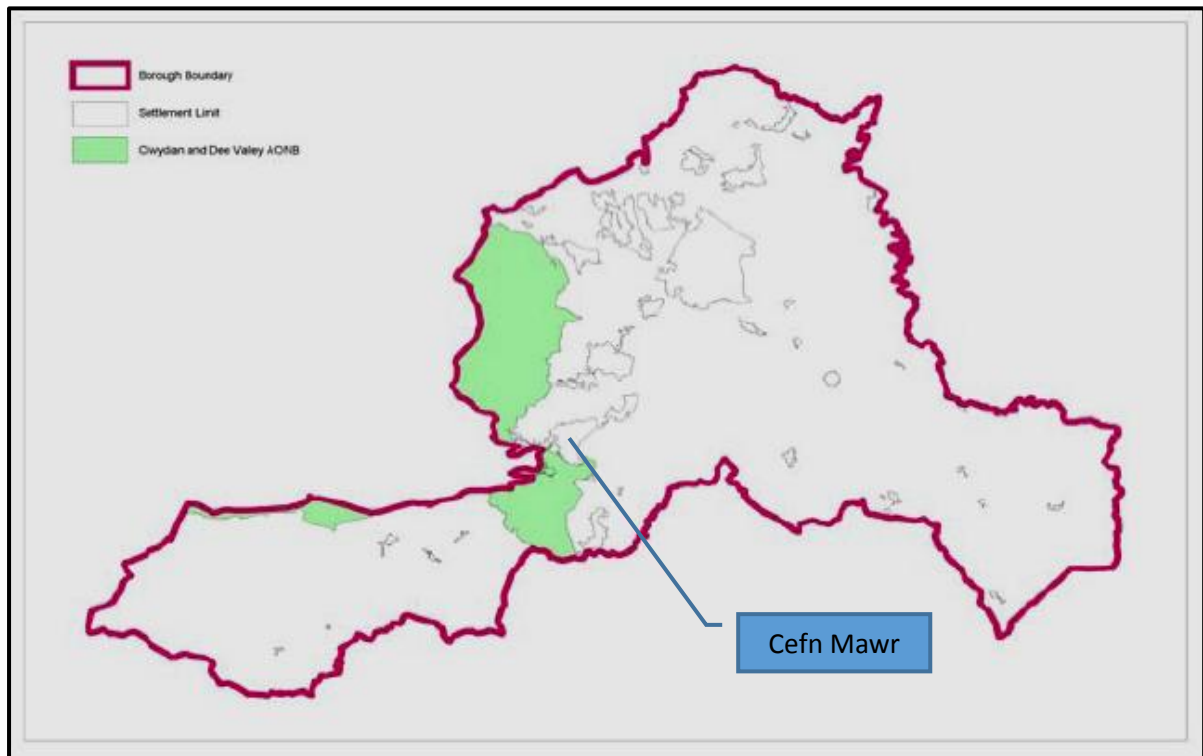
If ignored and left this will cause further hardship to the community of the Cefn and Cefn Mawr for an undetermined period in terms of both continued and unnecessary economic depression and health problems. The option for leaving the site in the currently contaminated state to the detriment of the community is not to be accepted.

The PKC Group is more than willing to work with both Eastman's (the current site owners) and WCBC to bring about a suitable solution to the site that will meet the goals and aspirations of the LDP2 as stated. The PKC Recommendations will then enable the ex-Monsanto site to be turned around for the benefit of the Cefn & Cefn Mawr, the County of Wrexham, North East Wales and the Welsh Nation as a whole.

**The PKC Group are seeking access to the URS Intrusive Survey Report.** We would like access to this for a full assessment of the findings on a voluntary basis rather than having to force the issue through the freedom of information act. So we publicly ask for this courtesy.

### Area of Outstanding Natural Beauty

*In March 2011 the Countryside Council for Wales (CCW) made the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (Designation) Order. The Minister for the Environment and Sustainable Development confirmed the Order on 22nd November 2011. In doing so, land including southern parts of the Clwydian Range together with the Vale of Llangollen and the Dee Valley were formally designated as an Area of Outstanding Natural Beauty (AONB).*



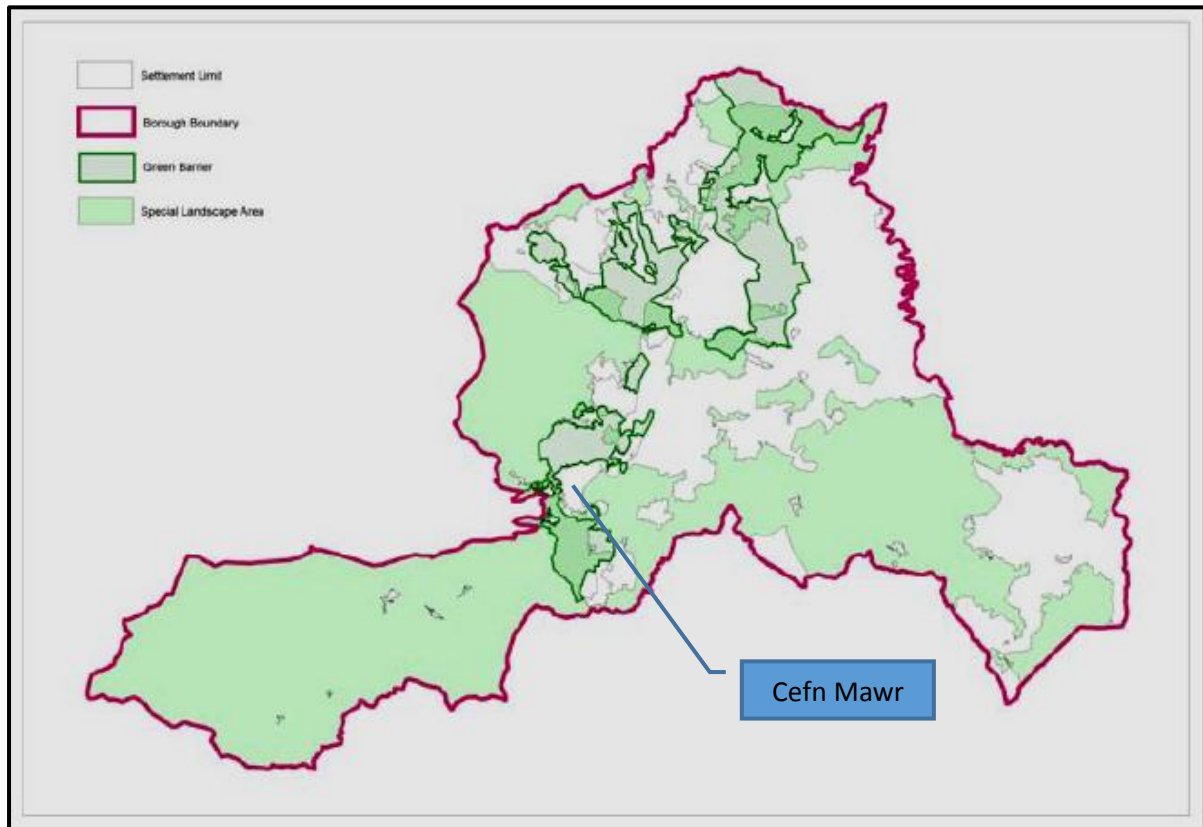
*AONB designation seeks to manage natural beauty for the benefit of social, economic and environmental wellbeing. AONB Management Plans are a community led strategies implemented by partnerships of organisations and interested parties. The plans do not dictate actions within the designated areas and do not control agriculture, business or economic development activities but seek to positively manage change.*

*Within the existing Clwydian Range AONB a Joint Advisory Committee oversees delivery of the AONB Management Plan. The Committee comprises local authorities, organisations representing the interests of landowners and farmers, local business and groups interested in landscape conservation. A new Joint Advisory Committee has been established to cover the entire designated area in 2012. The new Advisory Committee will agree and guide the activities proposed in the Clwydian Range and Dee Valley interim statement and action plan.*

**The Cefn & Cefn Mawr** is immediately adjacent to the AONB and the ex Monsanto site is on the very boarder of such, therefore yet another reason for turning this now unused Brownfield site around to a more appropriate use such as suggested by the PKC group. Our proposals for reinstating the Plas Kynaston Canal all the way to the Queens Hotel and new marina will coordinate well with the Llangollen Canal and the Pontcysyllte WHS as well as the AONB. This will be accompanied with open park land to the south and west of the canal with an appropriate housing development to the north side of the canal.

### Special Landscape Areas & Green Networks

*These were assessed in 2010/2011 using LANDMAP and CCW guidance on local landscape designations following the direction of the Planning Policy Panel, who wished to see SLA retained and added to where justified by LANDMAP. CCW guidance is clear on the requirement for community consultation in identifying locally valued landscapes and endorsing areas included. The broad strategic scale at which LANDMAP considers the landscape does not allow locally valued landscapes to be identified consistently across the authority. It is important that evidence relied upon to underpin the SLA is made available early enough to help identify environmental constraints and aid sustainable strategic land allocation decisions.*



*Green networks form links with 'Habitat Connectivity, Green Infrastructure and Wildlife Corridors' and are of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect villages, towns and cities have valuable landscape functions.*

*The pattern of green space, its naturalness and access has been mapped for the entire authority. This strategic mapping work links to many agendas and planning policy areas; planning and protection of urban green space; tranquil areas as a measure of local environmental quality; a context for green infrastructure, planning for climate change adaptation; local food production, play and recreation, habitats and sustainable networks; flood capacity and mitigation potential within urban green spaces; health and wellbeing benefits through physical activity and mental stimulation.*

**The Cefn & Cefn Mawr** is surrounded by Special Landscape Areas, and all the PKC Group proposals fall within the settlement limits as indicated, to simply make more efficient use of existing infrastructure and vacant sites, without crossing any green barriers, or consuming any Greenbelt land. All the recommendations and proposals by the PKC Group meet all the requirements of the LDP2 and are environmentally friendly.

## Noise

*Noise can cause annoyance, interrupt conversation, disturb sleep and, in extreme conditions, cause physical damage to those affected. Addressing noise at the planning stage of new noise generating or noise sensitive developments can help resolve many of the issues but it does not reduce the overall environmental noise because of other factors such as the growth in the number of vehicles on our roads.*

**We Suggest**, get more people to use the train, this will reduce the road noise significantly, and a Railway Station at Cefn Mawr will do this, by putting a railway station where it can be accessed easily, that provides large parking facilities, so people can dump the car, and within walking and cycling distance of a lot of people. This will reduce noise levels and congestion on our main roads.



The site for the new Railway Station would be in the cutting between the Tesco Supermarket and the Rhosymedre Industrial Estate. The embankments on each side would ensure that noise levels would be reduced to a minimum for the community to the left of picture and the new industry that would no doubt be established on the Rhosymedre Industrial Estate to the right following the construction of the new Cefn Railway Station.

Furthermore on the subject of noise all PKC Group Recommendations / Proposals produce minimal noise levels such as canals and provision for horse drawn vehicles.

## Built and Historic Environment Topic 2

### Planning for Sustainable Buildings

*Development proposals should mitigate the causes of climate change by minimising carbon and other greenhouse gas emissions associated with their design, construction, use and eventual demolition. The overall aspiration is to secure zero carbon buildings while continuing to promote low and zero carbon technologies.*

**We actively support** the restoration of buildings rather than demolition and rebuilding where ever possible and increasing the thermal efficiency of those buildings to reduce heating requirements, CO2 emissions and subsequent heating bills. The recent restoration of the Holly **Bush Inn in Cefn Mawr** by the PKC Group is an ideal example of such practice. We practice what we preach.

*Development proposals should also include features that provide effective adaptation and resilience to the effects of climate change for example sustainable urban drainage systems. The Welsh Government has set sustainable construction standards in relation to levels of the Code for Sustainable Homes or BREEAM for nondomestic uses.*

**We actively support** correct and suitable drainage systems, and planning for the future climate changes regarding such.

### Historic Environment - Planning Policy Wales Edition 5 (2012)

- *Reflect national policies for the preservation and enhancement of the historic environment*
- *Set out proposals for re-use or new development affecting historic areas and buildings*
- *Reflect national policies for the protection and enhancement of sites of archaeological interest and their settings. Archaeological remains identified as being of national importance should be identified for preservation*

**We actively agree** with these policies and further promote them by making recommendation for the full reinstatement of the Plas Kynaston Canal and Jessop's Tramway, both important historic infrastructure assets to the community of Cefn & Cefn Mawr that can be restored to satisfy the objectives of the LDP2.

- *Make it clear that development proposals will be judged for their effect on the character and appearance of conservation areas*
- *Emphasise the need to protect both the World Heritage site itself and its setting*
- *Take into account the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales*

**All the Recommendations** by us will meet these criteria and address the problems identified therein. The proposals will have a positive effect on the character and appearance of the Cefn Mawr and Pontcysyllte conservation areas complimenting and improving such.



### Protection of World Heritage Sites (DCLG: 2009)

*The outstanding universal value of a World Heritage Site indicates its importance as a key material consideration to be taken into account by the relevant authorities in determining planning and related applications. Any site specific proposals for an area within the World Heritage Site should have special regard for the site, its setting and buffer zone. World Heritage Site status is a key consideration and local planning authorities should aim to satisfy the following principles:*

- *Protect the World Heritage Site and its setting, including any buffer zone, from inappropriate development.*
- *Strike a balance between the needs of conservation, biodiversity, access, the interests of the local community, visitors and the sustainable economic use of the World Heritage Site in its setting.*
- *Protecting a World Heritage Site from the effect of changes which are relatively minor but which, on a cumulative basis, could have a significant effect.*
- *Enhancing the World Heritage Site where appropriate and possible through positive management.*
- *Protecting World Heritage Sites from climate change and ensuring that mitigation is not at the expense of authenticity or integrity.*

**We openly support** all these policies for the protection of the Pontcysyllte Aqueduct World Heritage Site at the central section, The Cefn & Cefn Mawr and all our recommendations and proposals are designed to complement the WHS status whilst also serving the community.

*The setting of a World Heritage Site is the area around it (including any buffer zone) in which change or development is capable of having an adverse impact on the World Heritage Site, including an impact on views to or from the Site. The UNESCO Operational Guidelines seek protection of the immediate setting of each World Heritage Site, of important views and of other areas that are functionally important as a support to the site and its protection.*

**We agree** with this but also point out that more should be taken into account. Non development can also have an adverse effect by detracting from the WHS & AONB, take for instance the Ex-Monsanto Site as a prime example. Proposals that interact with the site in a positive way for the benefit of all, addressing the negative aspects should be given preference, and the focus moved from just catering for the tourist with disregard for the surrounding community.

All the PKC Group proposals are designed to do this, because to develop the tourist industry at the central section of the WHS and increase the dwell time of people visiting the area this has to be done. Therefore the PKC Group proposals and recommendations look at the whole area of the Cefn & Cefn Mawr and how the local community can be supported by developing the tourism industry. Note the community of the Cefn & Cefn Mawr comes first in this case as this is the resident community and has to be actively involved in the process rather than excluded from it.

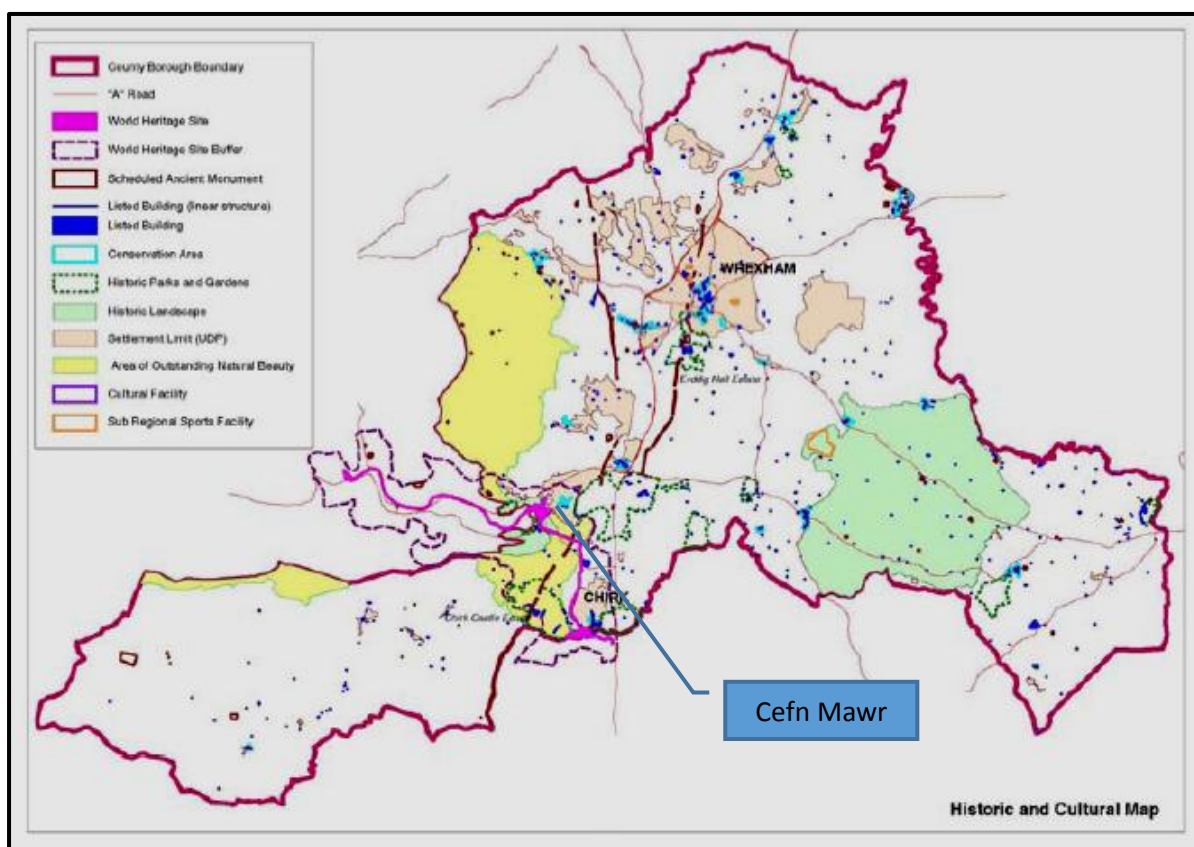
### Destination Management Plan 2012-2017 (WCBC 2012)

*The key challenge for WCBC and the wider tourism and visitor economy is to boost visitor numbers and spend in the WCBC area. The Destination Management Plan (DM Plan) identifies an ambitious shared vision and common goals for the future growth of the visitor economy of Wrexham County Borough (WCB). The priorities are: Investment in the key hubs of the World Heritage Site, Erddig Hall, Chirk Castle Chirk and the Ceiriog Valley; an events strategy for the town of Wrexham; visitor accommodation development; a sense of place; visitor management and partnership and performance.*

*Tourism is a key growth sector for the local economy. Tourists are looking for ‘immersion’ in a culture, unique experiences, authenticity, exploration, adventure and personal fulfilment from their holiday experience. The county borough’s key destinations (WHS, Erddig and Chirk Castle) and the county borough’s sense of place, townscape and landscape provide important opportunities to tap into tourism and drive regeneration. (Destination Management Plan)*

**PKC Group Response**, there is a problem in most of the DM planning for the central section of the WHS in that the Cefn & Cefn Mawr has largely been left out of it, and the focus has been solely based on catering for the tourist only. Simply reading the literature on such confirms this in both the ARUP Master and Pleydell Smithyman Development Plans for the WCBC and CRT respectively.

Therefore the PKC Group are now making a series of recommendations and proposals under this LDP2 to redress these omissions and promote our community to where it should be, as a central hub for both the Pontcysyllte World Heritage Site, the Dee Valley and South Wrexham and forming an integral part of the tourist attraction package for the central section of the WHS. This would then promote our community on similar lines to a Hebden Bridge or Blist Hill model and add to the general overall appeal of the WHS, Wrexham and North East Wales.



### Landscape & Design

*There is a need to improve landscape design within and around the periphery of urban centres generally, both to ensure transition with outlying areas and along sensitive or important routes and also in respect of public realm works in order to improve the overall visual quality of the urban environment. Key hubs for the development of tourism identified in the Destination Management Plan; the World Heritage Site, Erddig Hall, Chirk Castle Chirk and the Ceiriog Valley.*

**Comment:** the World Heritage Site must include the Cefn Community at its central section and is a very viable option.

## Cultural and Historic Heritage

*Little is known of Neolithic life in the area as this period generally leaves few traces although artefacts have been found in Borrás. There are 27 Bronze Age barrows listed in the S.M.R. (Sites and Monuments Record) two of which are in the town of Wrexham itself (Fairy Mount, Fairy Road and Hillbury Road).*

*Little is also known of the Iron Age in Wrexham. There are the dramatic landscape features of the Forts (Bryn Alyn (near Bradley), Y Gaer (near Pentre Broughton) and Y Gardden (near Ruabon) dominating important strategic positions but most of these have never been fully excavated and some have unfortunately already been quarried away. The landscape that surrounded them is buried and may be retrieved by future research.*

*Evidence of Roman occupation can be found at Holt, where a tile and pottery works were constructed on the banks of the River Dee and at Ffrith where the remains of buildings have been located. In recent years evidence of Roman occupation nearer the town centre, was found during the construction of the Plas Coch retail park. It is alleged that during the construction of the retail development in 1991, a hoard of Roman currency coins was discovered by workmen, however all of the coins disappeared. In 1995 further construction work on the site revealed traces of Roman field boundaries, hearths and a corn drying kiln. It is thought that these are the remains of a farmstead.*

*The identity and sense of place in Wrexham has been strongly influenced by its geography as a border town between Wales and England. The construction of Watt's Dyke and Offa's Dykes are the visible symbols of struggle for control of the Welsh border from the 7th to 9th centuries. The final Anglo-Norman victory in the 12th century led to the construction of Chirk. Other important settlements of the time were Holt and Bangor-is-y-coed at the limit of navigation on the River Dee, an important monastic centre. There are a number of significant churches in the area in particular Wrexham, Gresford and Holt, and there are many derelict and decaying chapels within the old mining towns of the borough.*

*The western part of the borough was transformed from the late 18th Century onwards by rapid industrialisation profiting from the occurrence of coal and iron. The legacy of industrialisation can be seen in the settlement patterns of the borough and the remains of the buildings, Minera (Lead Mines), elsewhere a significant number of colliery buildings survive with significant colliery landscapes, there was clay extraction and brick-making at Brymbo, Gwersyllt, Coedpoeth, Wrexham, Rhosllanerchrugog, Ruabon, Newbridge and Acrefair. A principle industry was iron and steel making with historic remains at Bersham and Brymbo, other significant industries were engineering, chemicals, brewing, peat extraction and textiles.*

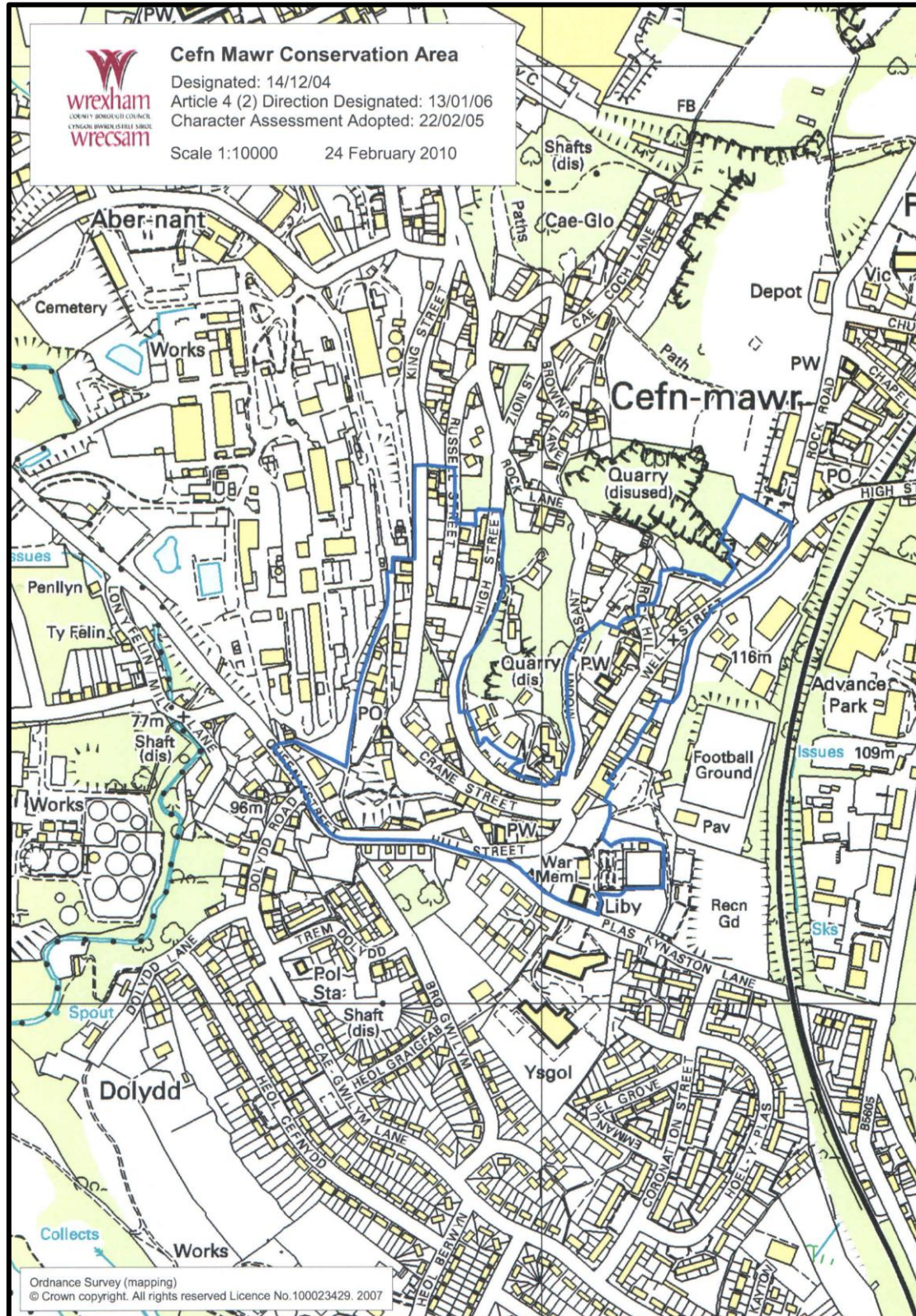
**Comment,** Iron Bridge is famous for one Iron Bridge and yet the iron bridges made at the Plas Kynaston Iron Foundry, that are still in use today go virtually un-noticed and form a major contribution to our industrial heritage. Please see:

<http://www.plaskynastoncanalgroup.org/plas-kynaston/plas-kynaston-foundry/>

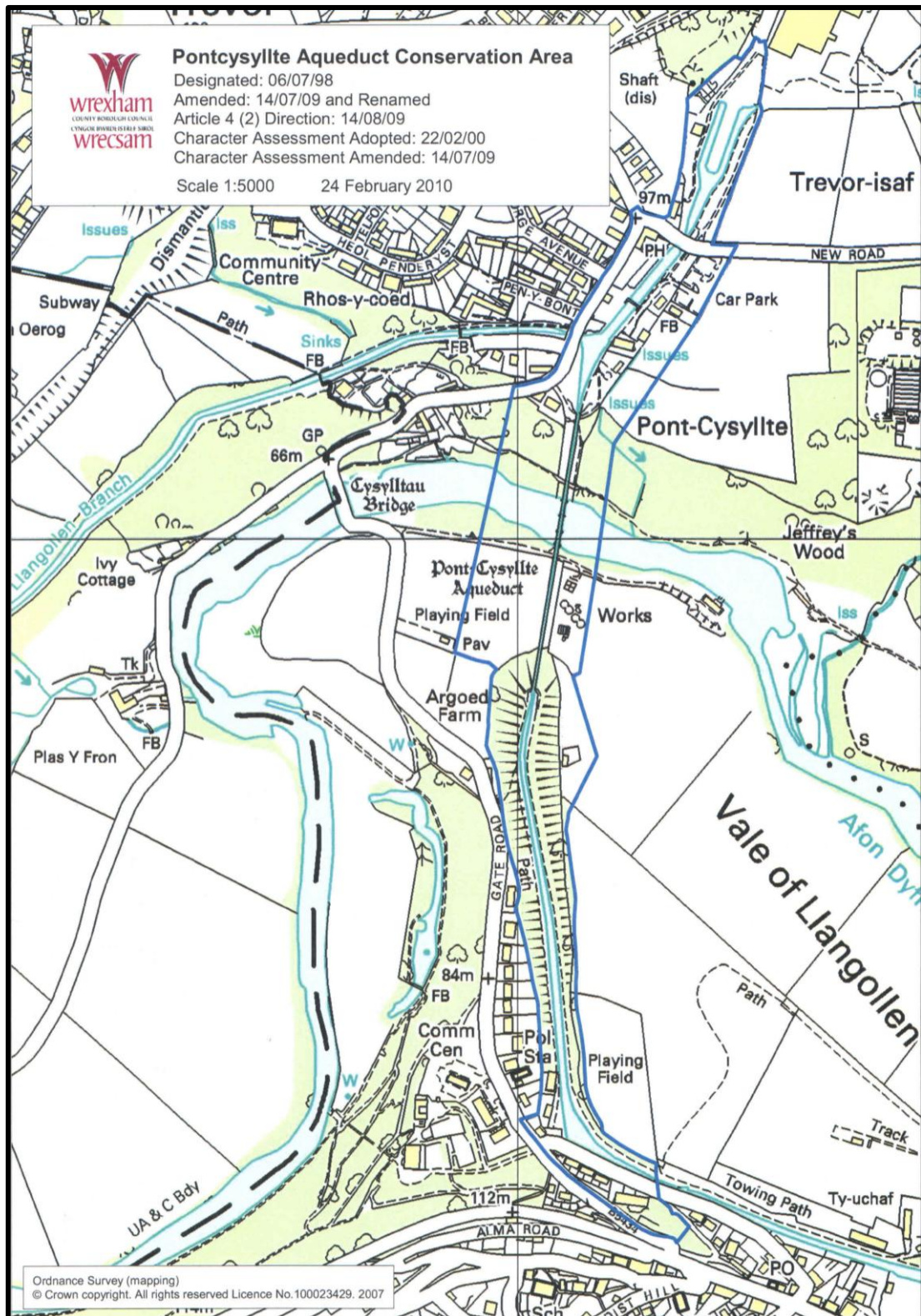


## Conservation Areas

There are 23 conservation areas including **Cefn Mawr & the Pontcysyllte Aqueduct** in the county of Wrexham and there are Article 4(2) Directions, areas judged as having special merit requiring additional controls in place at **Cefn Mawr, Pontcysyllte Aqueduct**, Chirk, Bangor, Fairy Road, Gerald Street/Grosvenor Road, Holt, Overton, Rossett, Ruabon and Salisbury Road.

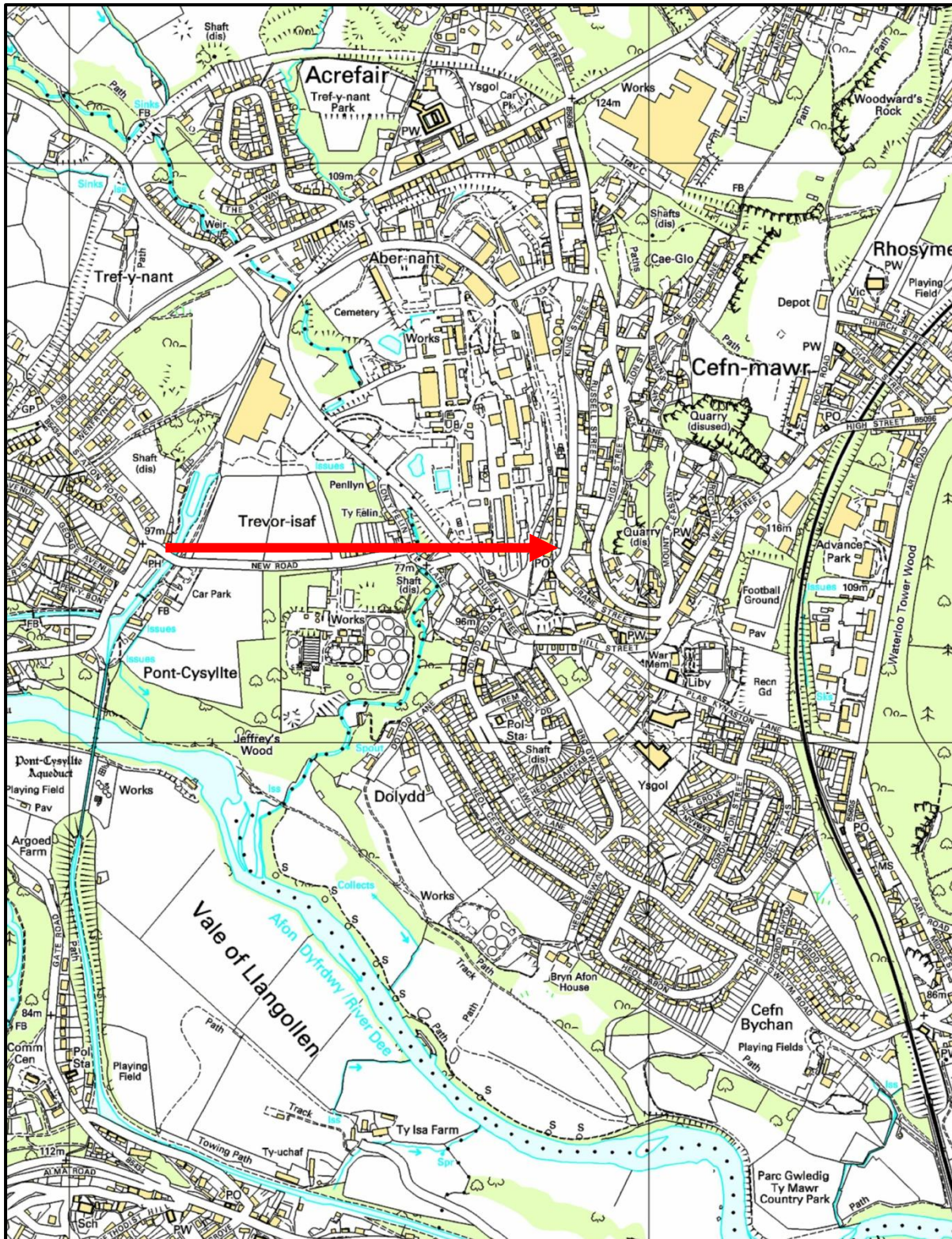






**NOTE:** the two conservation areas are only half a mile apart and it makes sense to connect them together with appropriate infrastructure that complies with the LDP2 and all guide lines issued by the WAG. This would consist of reopening Jessop's Tramway, to enable a horse drawn hackney service to be operated and the full reinstatement of the Plas Kynaston Canal all the way to the Queens Hotel terminating in a 60 berth marina.



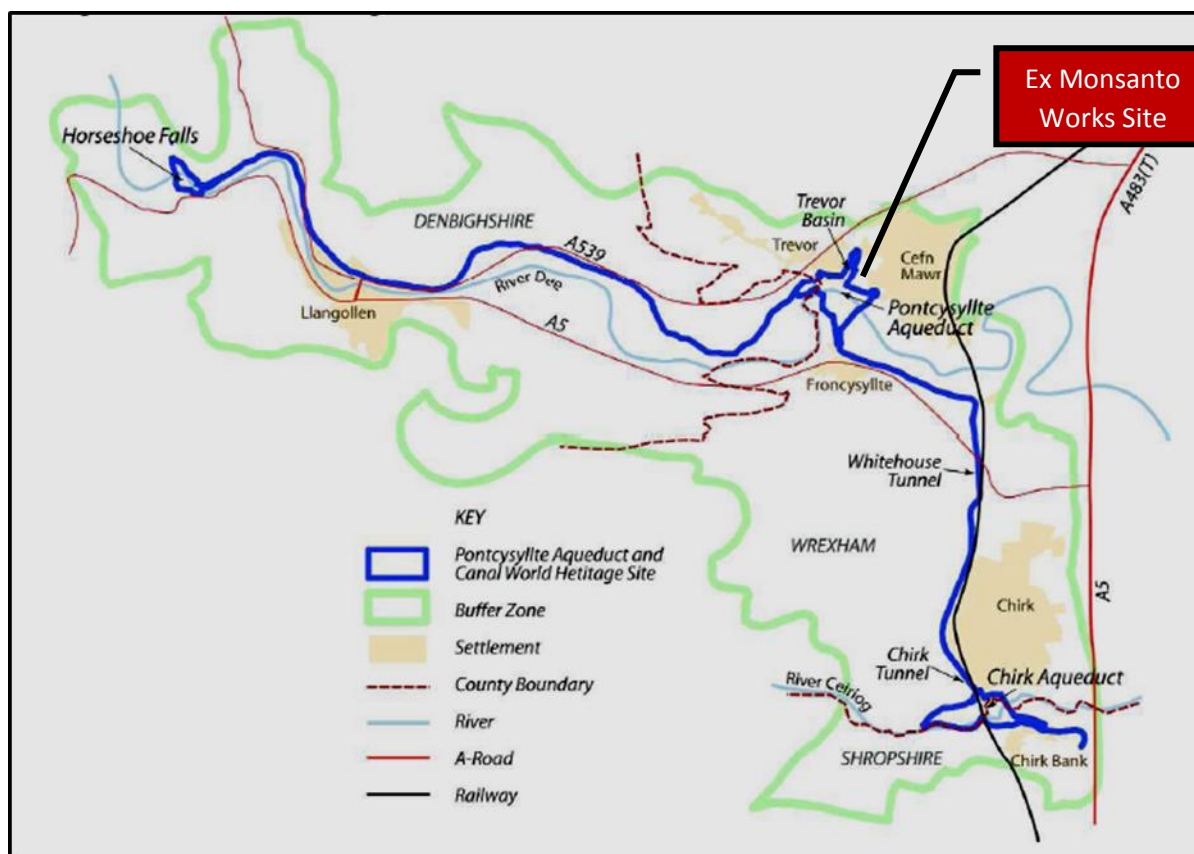


**The distance** from the Telford Inn at the Trevor Basin to the Post Office on Crane Square in Cefn Mawr is **676mts** as the crow flies, so reuniting the community is not that great a task in reality. See the proposals for Jessop's Tramway and the Plas Kynaston Canal. Both of which suit the LDP2. Jessop's tramway is one mile long following a gentle gradient engineered in 1805 for horse drawn vehicles, such as horse drawn hackney carriage service operating between the Trevor Basin, the Windborne Gate Parking Area and the centre of Cefn Mawr.



### Pontcysyllte Aqueduct and Canal World Heritage Site

The Pontcysyllte Aqueduct and Canal was inscribed by UNESCO as a World Heritage Site in June 2009. The World Heritage Site forms a linear corridor which extends from the Horseshoe Falls west of Llangollen (Denbighshire) to Gledrid Bridge to the east of Chirk Bank (Shropshire). The area inscribed within the World Heritage Site incorporates the Pontcysyllte Aqueduct and associated engineering features Horseshoe Falls, Chirk Aqueduct, the Llangollen feeder canal, cuttings, embankments and tunnels. The immediate visual setting of the Horseshoe Falls, Pontcysyllte Aqueduct and Chirk Aqueduct are also included.



The Outstanding Universal Value of the World Heritage Site is not contained purely within the inscribed area. The cultural, settled and aesthetic landscape which contribute to the presentation, setting, sense of arrival and history of the World Heritage Site are all important to the integrity of the designation. Buildings, archaeology, views and landscape features combine in places to form distinctive character and sense of place which complement the experience and understanding of the World Heritage Site.

A Buffer Zone has therefore been drawn around the World Heritage Site to allow historic, cultural and landscape elements which contribute to the authenticity and integrity of the Site and therefore to its Outstanding Universal Value to be conserved. The boundary follows the principal ridgelines of the Dee, Chirk and Ceiriog valleys to include the Site's broad landscape and visual context.

The Buffer Zone itself is not of Outstanding Universal Value, it simply defines the outer limits of a zone containing areas which by association with the World Heritage Site important to the Site's Outstanding Universal Value. It is not the purpose of the Buffer Zone to impose a blanket conservation approach to the entire area, but to encourage sustainable development which through contextual awareness conserves and enhances the World Heritage Site.

**PKC Group Fully Supports**, and makes the positive contribution of prompting the remediation of this.....the ex-Monsanto works site, looking at Trevor Basin from Cefn Mawr.



This vacant and contaminated site literally stands between centre of Cefn Mawr and the ability to support itself on a sustainable tourism based economy in conjunction with North East Wales's top tourist attraction. This immediately next to the AONB and within the Pontcysyllte World Heritage Site cannot be allowed to continue. Otherwise the LDP2 may as well be filled in the bin. Surely this cannot be allowed to continue, as said sometimes .....

***Sustainability means treating the earth with respect so that it is in a healthy state for future generations. It also means making wise and sometimes challenging decisions in order to achieve positive benefits in economic, social and environmental terms.***

The full statement of Outstanding Universal Value for the Pontcysyllte Aqueduct and Canal and the criteria the site meets can be found at <http://whc.unesco.org/en/list/1303>

*The former industrial village of **Cefn Mawr has been identified** by a number of sources including Landmap and 'An Industrial Archaeological Survey of the area around the Pontcysyllte Aqueduct and Canal' as **of particular significance and even international significance**, partly because of its historic relationship with the World Heritage Site, and the Pontcysyllte Aqueduct. **As a relatively well preserved example of an unplanned industrial settlement**, Cefn Mawr makes a particular contribution to the understanding of the WHS and its industrial hinterland. The central area contains the Grade 2 listed Plas Kynaston which was linked to the Kynaston family that owned the Plas Kynaston Foundry from where the Aqueduct's ironwork was cast.*

*Several of the central streets trace the line of the old industrial tramway network and it is likely that important archaeology remains beneath them. The old quarries provide visual evidence of the area's past, and the built heritage comprising a mixture of Cefn stone and Ruabon brick and terra cotta records and preserves the evolution and development of these very important historic local industries which are themselves **of regional and national significance**.*

Please see <http://plaskynastoncanalgroup.org/plas-kynaston/plas-kynaston-foundry/>

*The Industrial Archaeological Study of the area around the Pontcysyllte Aqueduct and Canal recommends archaeological excavation to improve interpretation of the industrial origins of the World Heritage Site, for example one of the brick works around the Cefn Mawr area (Newbridge or Acrefair) associated with the site. This would provide opportunities to improve the visitor attractions in the area and provide synergy with the regeneration of the locality.*

**Comment:** although we see Cefn Mawr mentioned in the same section as the Pontcysyllte Aqueduct under the LDP2 we have yet to see ANY proposals or recommendations about how to unify the fragmented area. Cefn Mawr became isolated from the inland waterway network during the expansion of the Monsanto Chemical Works, back filling in the Plas Kynaston Canal Branch and closing Oily Works Road which is a part of Jessop's Tramway and literally creating an atmosphere (HS2 releases) where people did not want to come to. Now the community of Cefn Mawr remains isolated by the vacant site which is an eye saw immediately next to the aqueduct and AONB?

**The PKC Group are making** proposals and recommendations for inclusion in the LDP2 that will turn this site around and open up links in ways that will coordinate with the inland waterway and national rail that will encouraging tourism to not only visit the aqueduct but also explore the wider area of the Cefn & Cefn Mawr. This will increase the dwell time and establish the Cefn & Cefn Mawr as a tourist destination in its own right, while meeting all the requirements of the LDP2 and Welsh Assembly Government and helping to provide a sustainable income for the community. The main site specific proposals for the Cefn Area are:

- Central Free Parking at the Windborne Gate
- Jessop's Tramway reopened to enable a horse drawn hackney service between the Aqueduct, the Windborne Gate parking area and the centre of Cefn Mawr.
- The FULL reinstatement of the Plas Kynaston Canal all the way back to the Queens Hotel in Cefn Mawr, terminating in a 60 berth marina.
- Landscaping for open park land on the former site to the south side of the PKC Canal.
- A cable car system between the Windborne Gate and the Crane in Cefn Mawr (this will be dependent on head count numbers in the Windborne Gate parking area).
- A railway station at Cefn Mawr between the Tesco Supermarket and the Rhosymedre Industrial Estate.
- An appropriate number and mix of housing units to the north of the PKC canal that will not detract from the WHS inscription and designation.

These proposals will do exactly what they say on the tin. They will turn the presently depressed community and vacant brown field site around to a more sustainable and economically viable hub for South Wrexham and North East Wales.



## Heritage Assets

*There is a range of heritage assets owned by the County Borough Council Bersham Colliery, Bersham Heritage Centre and Ironworks, Brymbo Steelworks, Clywedog Trail, Holt Castle, Minera Lead Mines, Penrhos Engine House and Wrexham Museum. A full inventory of heritage assets is underway and may be useful to identify priorities for conservation/development.*

**Comment:** we note that the Plas Kynaston Hall and gardens are not listed here and is the most historical heritage asset in Cefn Mawr, more so than Plas Kynaston House which is listed. Unfortunately this building is in a poor state of repair even though presently owned by WCBC.

## Main Sustainability Issues Identified

1. *Pontcysyllte Aqueduct and Canal World Heritage Site and its Outstanding Universal Value are of international importance and require protection together with its buffer zone and attributes of value within the buffer zone.*
2. *There are a number of areas and types of development where design needs to be particularly sensitive; Clwydian Range and Dee Valley AONB and Special Landscape Areas; historically sensitive sites (WHS, Conservation Areas, Listed Buildings etc); transitional areas between urban and rural fringes; sites adjacent key gateways and landmarks along the A483; public realm; and key destination hubs such as Erddig Hall and Chirk Castle.*
3. *Key visitor destination hubs (World Heritage Site, Erddig, Chirk Castle and Wrexham) present opportunities for sustainable tourism development.*

**The Cefn & Cefn Mawr** should also be one of these primary tourist definitions, hence maybe the wording should be Cefn Mawr and the aqueduct as it once was?



View of **Aqueduct & Cefn** from Canal, before the construction of the Monsanto Chemical Works.





View of Aqueduct & Cefn Mawr in 2014 after the demise of the Monsanto Works.



The Aqueduct, Cefn Mawr.

## Community Wellbeing and Cohesion Topic 3

### United Nations Convention on the Rights of the Child (UNCRC 1990)

1. *Have a flying start in life;*
2. *Have a comprehensive range of education and learning opportunities;*
3. *Enjoy the best possible health and are free from abuse, victimisation and exploitation;*
4. *Have access to play, leisure, sporting and cultural activities;*
5. *Are listened to, treated with respect, and have their race and cultural identity recognised;*
6. *Have a safe home and a community which supports physical and emotional wellbeing; and*
7. *Are not disadvantaged by poverty.*

**We Support**, all these aims in the LDP2 by the UNCRC.

### Our Healthy Future: Welsh Government (2009)

*Highlights ten action areas for Wales, these are; reducing inequities in health, improving mental well-being and workplace health, cutting smoking levels, increasing physical activity, reducing unhealthy eating, stopping the harm from alcohol and drugs, cutting the number of teenage conceptions, cutting the number of accidents and injuries and increasing immunisation rates.*

**We Support**, all these aims in the LDP2 by the Welsh Government.

### Planning Policy Wales edition 6 (2014)

*This guidance states that the Welsh Assembly Government's main planning objectives in relation to sport and recreation are to promote a more sustainable pattern of development by creating and maintaining networks of facilities and open spaces in places well served by sustainable means of travel. Social inclusion, improved health and well-being by ensuring that everyone, including the elderly and those with disabilities, have easy access to good quality, well designed facilities and open space.*

*Formal and informal open green spaces, including parks with significant recreational or amenity value, should be protected from development, particularly in urban areas where they fulfil multiple purposes, not only enhancing the quality of life, but contributing to biodiversity, the conservation of nature and landscape, air quality and the protection of groundwater. Such open spaces also have a role in climate protection and in enabling the adaptation of urban areas to the impacts of climate change, for example by contributing to flood management and helping to reduce urban heat island effects.*

### Climbing Higher – WG Strategy for Sport & Physical Activity (2005)

*Medical research has established the link between sport, physical activity and health. Diet is also crucial. While all groups benefit from increasing the intensity and frequency of exercise, the greatest health gains are achieved when the sedentary become more active, even at a low level.*

*A daily total of just 30 minutes of moderate intensity activity, which can include brisk walking, dancing, aerobics, vigorous gardening, skateboarding, swimming, or cycling to work, undertaken five times a week is enough to drastically reduce the risk of premature death and as much as halve the risk of developing a major chronic disease such as coronary heart disease/diabetes and cancer.*

*Physical activity is as important to economic prosperity as it is to health. Not only do health and fitness form part of any sensible definition of wellbeing, but healthy people are also more productive. At the same time the sports and active recreation industries are both important and growing. The unique natural environment of Wales is to be used as well as admired. Access to open countryside offers significant opportunities for more active recreation, as well as associated health, business and education opportunities.*

**PKC Group agrees.**

### Technical Advice Note 16: Sport, Recreation and Open Space (January 2009)

Chapter 3 of TAN16 relates specifically to Local Development Plans and identifies issues that should be addressed in the development plan. This includes guidance on the following:

- *protecting and enhancing existing sport and recreation facilities and open spaces*
- *planning new open space and recreation facilities*
- *major sport and recreation facilities*
- *provision for children and young people*

*In addition, TAN16 states that LDP policies should be founded on robust evidence derived from the POS survey, with paragraph 3.2 continuing to state that ‘the LDP should set out the strategic vision for the authority with regard to providing, protecting and enhancing facilities for sport, physical activity, open space and recreation, and provide clear area-based or criteria-based policies.*

*Plans should consider the scale and distribution of facilities and activities when allocating sites for open space and recreational use. Particular regard should be given to the needs of communities, which have poor provision of open space and recreation facilities, and to those of socially and economically disadvantaged communities’.*

**Observation,** perhaps more assistance could be given to Splash Magic, the former Plas Madoc Leisure Centre and the best facility the Cefn & Plas Madoc had up until its closure in 2014 by the WCBC.

### Technical Advice Note 20: Planning and the Welsh Language (2013)

*The Welsh Language is part of the social and cultural fabric of Wales. The future of the language will depend on a wide range of factors particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities. The land use planning system should where feasible and relevant contribute to the future wellbeing of the Welsh language by establishing the conditions to allow sustainable communities to grow.*

**We support this.**

### Wrexham County Borough Council Play Sufficiency Assessment 2013

*Due to concerns about obesity levels within Wales (3rd highest in Europe) Welsh Government made the assessment of Children’s Play Provision within Wales a statutory duty for all local authorities. The key assessment findings are;*

- *Secure spaces and opportunities for play in close proximity to children’s homes within play streets, public realm, green space and green networks*
- *Secure a wide range and variety of spaces for play to offer different play types, experiences, allowing for choice, access for all, accommodation and uncontested use*



- *Design high quality play rich environments, which invite and stimulate play within fixed play provision and natural play environments*
- *Enhance the play value characteristics of existing green space*
- *Ensure safe access*
- *Support communities in understanding local play needs, the types, provision and characteristics of spaces needed; involve all age groups and encourage community ownership through their planning and design*

**We support but** question the wisdom of Reads Yard Coach & Car Park for the Pontcysyllte Aqueduct being immediately next to a children's playground? **This exposes the children to high levels of NOx when the coaches start up, and is a safety hazard if small children are playing in the parking area, is this wise?**

### Accessible Natural Greenspaces & Green Networks

*Accessible natural greenspace has been assessed across the authority. Local standards are met at a county wide level with 67.8 hectares of accessible natural greenspace per 1000 population. Local provision within 300m of where people live is deficient with 43.8% of the population not having accessible natural greenspace. Sites which contribute include public and private urban greenspace, parks, cemeteries, former colliery spoil tips, some country parks, disused railway tracks and the World Heritage Site canal towpath.*

*Opportunities to resolve this deficit would come from enhancing all existing greenspace of low naturalness; accessing and enhancing school playing fields where practical; developing and promoting footpath links from urban edges to rural natural sites; negotiating safe access to private natural sites; provision of new strategic multifunctional greenspace along urban edges as part of green infrastructure planning.*

*A review of Unitary Development Plan proposed walking and cycling routes has demonstrated that while there are potentially routes that could provide valuable connections, recreation and tourist routes e.g. disused railway from Bangor on Dee to Cross Lanes and the disused railway west of Trevor to Llangollen, many are constrained and unlikely to be delivered. There will need to be a further review in the LDP.*

**We support** access to green space, and actively participate.

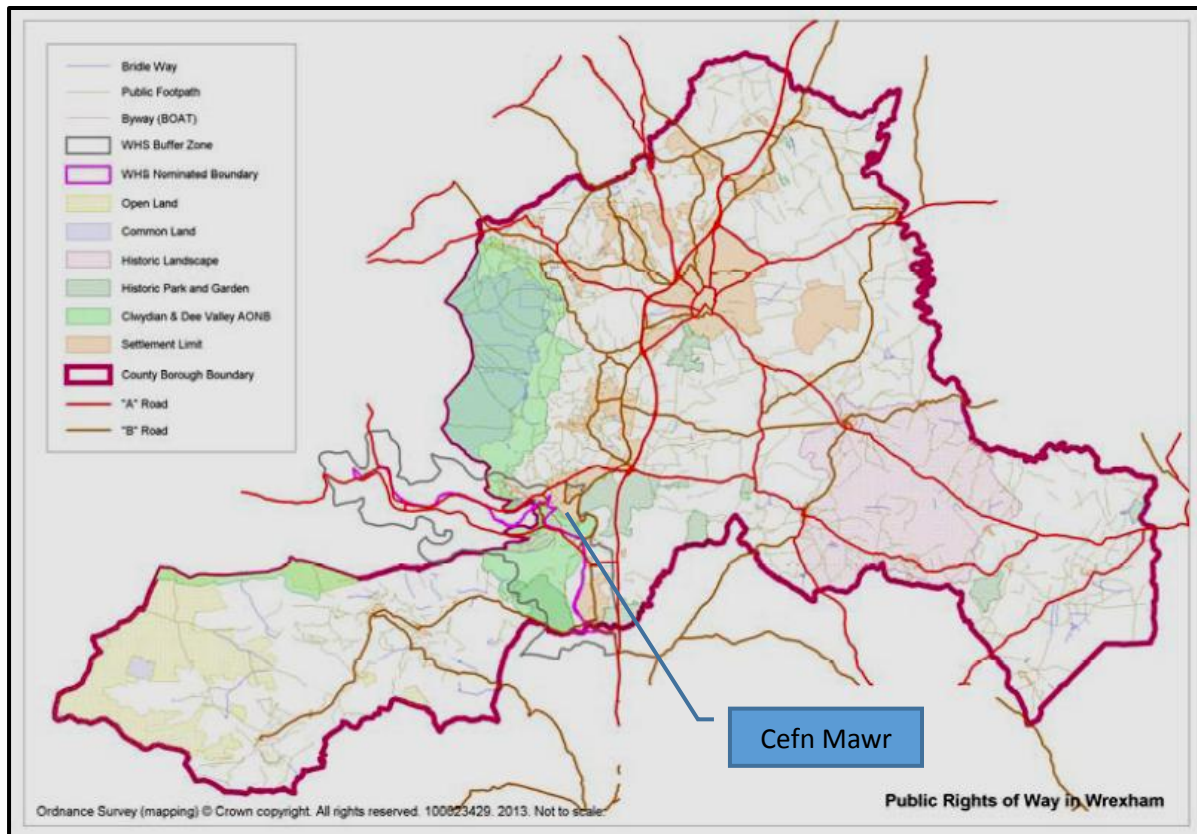
### Natural Environment & Public Access

*The unique and inspiring natural environment of Wales offers opportunities for public access encouraging healthy activities and economic regeneration while maintaining the eco-system functions of the environment. The Countryside and Rights of Way Act 2000 opens up large areas of Wales for public access, the combined area of open country and registered common land in Wales is about 360,000 hectares, or about 20% of the land area of Wales. This offers significant opportunities for more active recreation in the countryside, as well as associated health, business and education opportunities.*

*Within the County Borough we have the Clwydian Range and Dee Valley AONB, Pontcysyllte Aqueduct and Canal World Heritage Site with its buffer zone, locally distinctive landscapes such as the Ceiriog Valley, Chirk Castle and Erddig House, Maelor historic landscape, a range of registered parks and gardens and country parks. These are significant quality landscapes and heritage assets which can help address economic tourism, regeneration, education, access, recreation, health and wellbeing, sense of place, community cohesion and many other issues contained within this paper.*

*Facilitating public access to the natural environment is a network of footpaths, bridleways and byways. A range of former railway lines and disused land which are now inaccessible or uninviting to use could provide additional linkages facilitating public access to natural green spaces. By considering how linkages could be made or enhanced there may be opportunities for development to enhance access to natural green spaces and green networks.*

*There are a number of country parks of regional and local value, these are Alyn Waters, Ty Mawr, Nant Mill, Minera Lead Mines, Stryt Las, BoncyrHafod, Moss Valley, Acton Park, Ponciau Banks, Bryn Kinalt Park and Bellevue Park.*



## Wellbeing

*Contributors to individual and community wellbeing are multi-faceted and include issues such as deprivation, poverty, unemployment, crime and safety, community spirit, Welsh language, education and skills and the built and natural environments.*

**Comment:** this topic is called **Community Wellbeing and Cohesion**, firstly if the present situation of a divided community between the Trevor Basin and that of Cefn Mawr is not addressed and the economy of Cefn Mawr continues to fall this will only lead to further unrest and eventual anti social behaviour through social deprivation and inequality. This will detract from all the aspirations of the LDP2 and the WHS.

However if the site specific proposals of the PKC are adopted into the LDP2 these will unite the currently divided community and provide the economic stimulus to promote cohesion and community well being. The Cefn & Cefn Mawr is at a cross roads in its future which can either have good or bad results for both the community and WHS Inscription. We think the choice is clear.



## Waste Topic 4

### National Waste Strategy: Zero Waste (2010)

*The National Waste Strategy sets out the overarching strategy for dealing with waste in Wales. The document sets out an aspiration to reduce the use of landfill dramatically over the next decade through a significant increase in recycling, composting and through the use of energy from waste.*

- 1. By 2025 sectors in Wales to be recycling at least 70% of their waste – this includes businesses, households and the public sector. This will go a long way to helping us achieve zero waste.*
- 2. By 2050 achieve zero waste. This will mean that products and services will be designed so they have eliminated waste entirely.*

*To support these targets individual waste sectors have their own targets; household waste is to reduce by 1.2% p.a. (halving the volume by 2050); Construction and Demolition waste will reduce by 1.4% p.a. (60% reduction by 2050); Commercial and Industrial Waste will reduce by 1.6% p.a. (68.5% reduction by 2050); Commercial waste will reduce by 1.2% p.a. (halving the volume by 2050); and Industrial waste reduced by 1.4% p.a. (60% reduction by 2050).*

*It is clear that there is a need for infrastructure to enable waste to be dealt with in a sustainable way. The planning system has a key role to play in the delivery of the infrastructure required, including facilities for re-use, recycling and composting facilities, energy from waste facilities, and those facilities which deal with residual waste.*

### Waste management in Wrexham

*Wrexham, like the rest of the UK, has historically relied upon landfill for the management of waste. This reliance on landfill is a waste of potential resources and contributes towards global warming through the release of greenhouse gases. In order to change this, European and National legislation seeks to drive the management of waste up the waste hierarchy through the establishment of an integrated network of facilities to deal with waste sustainably.*

### Hazardous waste

*Waste is considered hazardous if it poses harm to human health or the environment either immediately or over a period of time. Hazardous waste can be produced by all waste streams. In 2010 North Wales produced 44,282 tonnes of hazardous waste, which is a relatively small percentage of the overall waste produced in 2010. Levels of waste produced by individual local authorities are therefore comparatively small and often require specialist facilities which can handle materials classified as hazardous waste. Arising's are too low to merit the provision of such specialist facilities in each local authority area.*

### Landfill

*There are two operational landfill sites in the County which accept non-hazardous and inert waste:*

- Pen Y Bont landfill (operated by FCC Environment)*
- Hafod (operated by Cory Environmental Resource Management)*

## Main Sustainability Issues Identified

1. *Wrexham has historically relied on landfill to deal with waste. Policy changes at the European and national level mean that this cannot continue, resulting in the need for additional facilities to deal with the waste produced. Landfills produce methane, which is a potent greenhouse gas<sup>4</sup>. Reducing reliance on landfill through waste reduction, recycling and recovery can help reduce the impact of waste management on climate change.*
2. *The North Wales Regional Waste Plan 1st Review undertook an SEA as part of the Areas of Search work and identified a number of sustainability objectives, including:*
  - *Ensure the prudent use of resources – encourage the reuse of brownfield land, avoid the use of good quality agricultural quality land*
  - *Minimise greenhouse gas emissions through the transportation of waste*
  - *Air quality – proximity to residential properties, Air Quality Management Areas*
  - *Protect and Enhance the landscape, townscape and cultural heritage*
  - *Minimise adverse effects on water quality – aquifers, source protection zones, river quality objectives*
  - *Avoid increasing flood risk*
  - *Protect biodiversity – avoid protected sites*
  - *Provide employment opportunities – ensure communities can access the jobs created by waste management*
  - *Protect local amenity – avoid county parks, public forests, common land*
  - *Minimise increase cost of waste management – consider the proximity to urban areas and strategic road network, construction requires due to slope*
  - *Minimise impacts on health- consider the proximity of residential development to waste management uses.*

**PKC Group Suggestion:** prevention is better than cure. Although this suggestion goes well beyond the scope of the LDP2, it is certainly one that would help in the reduction of waste while likewise helping in the recovery of our community and general economy, **TAX PACKAGING**, simple really.

**The PKC Group is a leading recycler in our community** simply because 80% of our commercial business does not produce any waste. How do we do it, we run the village pub, the oldest Pub in Cefn Mawr. Our beer comes in glasses drawn from barrels which are delivered and returned for refilling, so we produce very little waste.

The Holly Bush Inn was built from the spoil produced during the construction of the Pontcysyllte Aqueduct, so even our pub is built from recycled materials. We have also recycled the building recently with an extensive restoration program preserving and reusing much of the original materials in partnership with the THI & WCBC after years of neglect by the breweries.

**Taxing Packaging** will incur tax revenue for the government and encourage people to seek fresh produce that will help local economies. People would also seek out their local for a social pint that costs less to both their pocket and the environment by not producing any waste. A simple solution that will work well and make some money for the government! Have a pint on us for that one.

## Minerals Topic 5

### Minerals Planning Policy Wales (2001)

*Minerals Planning Policy Wales introduces the requirement for the LDP to contribute towards meeting the local, regional and UK needs for minerals, to safeguard mineral deposits which society may need for future working, address inactive sites, and ensure the impact of mineral extraction on the environment and alternative land uses is minimised. Local authorities are required to “provide positively for the working of mineral resources to meet society’s needs through as far as practicable, the identification of areas for future working where this can be undertaken in a sustainable way; and to safeguard deposits of minerals from permanent development that would prevent or hinder their subsequent extraction for future generations”*

*In relation to coal, MPPW states that “the objective of the Government’s central energy policy is to ensure a secure, diverse and sustainable supply of energy at competitive prices”. Although national energy policy has been revised since the publication of MPPW, the aim to ensure a secure and affordable supply of energy remains. The ability to ensure security of supply through the recovery of remaining UK coal reserves is recognised as a way of helping the UK achieve this aim.*

*In order to reduce the impact of aggregate production, local authorities are required to identify buffer zones around permitted and allocated mineral extraction sites (in line with Minerals Planning Policy Wales). MTAN 1 identifies the minimum distance that should be maintained for sand and gravel (100m) and hard rock quarries (200m).*

### Evidence

*Wrexham has a wealth of minerals which have been exploited in the past, including coal, limestone, peat, sand and gravel, slate, quartzitic sandstone and clay. Extraction is currently limited to sand and gravel, with Wrexham currently the largest producer of sand and gravel in the region.*

*A key information source regarding mineral resources in the County are obtained from the British Geological Society (BGS) Mineral Resource Map of Wales. The maps, which cover the whole of Wales, are published at a scale of 1:100,000 and include material of intrinsic economic interest. The information shown on the maps includes mineral resources which are inferred from available geological information, where levels of confidence regarding the quality, extent and accessibility of the resource are low.*

*Another key resource is the BGS Aggregates Safeguarding Maps of Wales. Access to mineral resources can be prevented or restricted (sterilised) by non-mineral development and the process of ‘mineral safeguarding’ ensures that this does not occur unnecessarily when development plan allocations are made. An effective safeguarding system requires the adoption of ‘mineral safeguarding areas’ and the adoption of suitable policies to manage development in these areas. In order to indicate the relative importance that can be attributed to particular mineral resources there are tiers of safeguarding, category 1 resources are of national importance, category 2 are of more local importance and category 3 may be of importance to supply locally but not in other areas.*

*Minerals can only be worked where they occur, whereas for other forms of development, such as housing, alternative locations may be available. The purpose of safeguarding minerals is therefore to ensure that important resources are not sterilised by development which can be suitably located elsewhere. Historically, the presence of minerals has not always been given adequate consideration during the planning determination process, resulting in the unnecessary loss of mineral reserves.*

## Clay

*Clay extraction is a traditional local industry which, until recently, used to supply clay for tile making. Ruabon was a major centre for brick making, exploiting the carboniferous age Ruabon Marl (or Etruria Marl) which is known for its quality. Hafod Clay pit is the only remaining permitted clay pit in Wrexham, though material is not currently exported from the site. There is a planning application currently being considered for the extraction and exportation of clay at the site. As with coal, there is no forecast of need and no landbank of permitted reserves.*

*Production of clay from Wales has declined significantly over the last few years, with no pressure for additional extraction in the County Borough. Furthermore, no clay from Wales is currently used in the making of bricks, pipes and tiles (Source: Annual Minerals Raised Inquiry 2010).*

## Limestone

*The limestone outcrop runs along the border with Wrexham and Denbighshire. In Wrexham, the outcrop falls along the Ruabon and Eglwysseg Mountain ranges, which fall within the Clwydian Range Area of Outstanding Natural Beauty. Within Wrexham, the area is a statutory protected site for nature conservation. Other smaller deposits of limestone occur on the southern border of the County and fall within a designated Special Landscape Area.*

## Coal

*Much of the local authority is underlain by the Denbighshire coalfield, which is separated from the Flintshire coalfield by a narrow outcrop of Dinantian and Namurian strata. Much of the North Wales coal field is located at depth, though there are resources of primary and secondary coal located in Wrexham and Flintshire.*

*Coal is not currently worked in Wrexham, however, historically coal has been worked at a number of sites which has left potential issues of land stability and other safety risks associated with former coal mining activities. Proposals for new development in areas where coal working is known to have occurred are likely to need a Coal Mining Risk Assessment. Remedial work may be required in order to ensure any risks are mitigated. Such remediation may involve extraction of surface coal.*

*Appendix A of MTAN 2: Coal contains detailed information regarding the North Wales Coalfield, and indicates that there are opportunities for opencast coal mining in the coalfield, particularly in the Denbighshire coalfield as the area is more rural. The Denbighshire coalfield extends from Caergwrle in the north to Chirk in the south and has a mixture of primary and secondary shallow coal resources. There is no forecast of need and no landbank of permitted coal reserves, such as for aggregate minerals.*

## Coal bed methane

*Coal bed methane is a form of natural gas that is extracted from deep coal seams. Whilst it is a relatively new technology to the UK, the presence of coal within the authority means there may be demand for coal bed methane extraction over the life of the LDP. It is not possible to determine where resources of coal bed methane may be viable to extract given the nature of the resource and therefore where such resources may require safeguarding.*

**Comment,** this is fracking.

### Quartzitic sandstone with potential for silica sand and silica rock

*There are extensive deposits of quartzitic sandstone (locally known as millstone grit) with potential for silica sand and silica rock around the Esclusham Mountain/Ruabon Mountain area. This is localised degraded Millstone grit of high silica purity. It is not unique, but is still worked near Eryrys, in Denbighshire.*

**Note:** Historically, quartzitic sandstone has been exploited locally for building stone and this is what was used to build the Pontcysyllte Aqueduct and Cefn Viaduct at Cefn Mawr extracted from local quarries of the Cefn.

### Dolerite intrusions with potential for high PSV

*There are limited surface deposits of dolerite intrusions with potential for high PSV in the south west of the County Borough.*

### Main Sustainability Issues Identified

- *Minerals are a finite resource*
- *Mineral extraction can only take place where the mineral occurs*
- *Mineral extraction is a temporary use of land, although operations can occur over relatively long periods of time*
- *Mineral extraction sites can have detrimental impacts on the environment if not carefully sited, taking into account issues such as groundwater, biodiversity and so on*
- *Mineral extraction can impact on air quality*
- *Mineral extraction can have a detrimental impact on the landscape if not carefully sited and restored*
- *Mineral extraction is a potential source of employment in rural areas.*

**We Support** the LDP2 and Minerals Planning Policy for Wales. The Cefn is rich in mineral deposits as indicated in the LDP2 and the group looked at the possibility of shallow depth mineral extraction in 2012 as a part of a remediation package. The leading remediation company in the UK, Scottish Coal was approached regarding the ex-Monsanto Chemical Works Site in Cefn Mawr, to try and find a solution for the site and future development of such.

Local Community Consultation was held and although some reservations were expressed verbally regarding mineral extraction, a ballot gave a **99.99% vote in favour of the remediation**. This therefore clearly says people want the place cleaning up.

Unfortunately, following the community consultations Scottish Coal withdrew and went into liquidation shortly afterwards.

However PKC Group remains in contact with the site owners, now Eastman's and hopeful that a solution can be found. The PKC Group sees this LDP2 as another step in the right direction towards that goal. Therefore we have prepared this extensive response to the LDP2 as we seek to work with all parties for a positive and sustainable outcome for our community.



## Economy, Employment and Retail Topic 6

### People, Places, Futures – The Wales Spatial Plan (2008 Update)

Wrexham County Borough together with Denbighshire and Flintshire lies within the 'North East Wales – Border and Coast' spatial area as identified in the Wales Spatial Plan. It lies on the urbanised and industrialised border with North West England forming a strategic hub with Deeside and Chester. The plan's vision for this area being:

*'An area harnessing the economic drivers on both sides of the border, reducing inequalities and improving the quality of its natural and physical assets'*

Wrexham is identified as a key settlement of national importance, being a key hub, business sector and regeneration area. North East Wales is highlighted as making a very important contribution to both the Welsh and UK economy. Its future prosperity is closely linked to North West England, in particular West Cheshire. The cross-border linkages to West Cheshire and Chester are therefore crucial. Development of cultural, retail, administrative and leisure functions within Wales has lagged behind employment and housing growth, with Chester providing the majority of these functions.

Key elements of the spatial strategy for this area include **strengthening key hubs as a focus for investment for future employment and improving the quality and diversity of the economy**. The Spatial Plan further suggests that there are opportunities for significant employment growth in health, particularly around Wrexham hospital. It also emphasises the importance of maintaining the quality of the offer of established key employment sites including the major industrial estates of Wrexham and Deeside and through the provision of a range of complementary strategic employment sites to attract high quality employers. Wrexham is identified as an area that competes in the international market in the field of mainstream manufacturing. It is important that the **quality and value of existing sectors within the spatial area are improved**, with the focus being on developing existing sectors, namely high manufacturing, financial and business services, public service administration, health and social care, **tourism retail and leisure**.

### Planning Policy Wales Edition 6 (2014): Chapter 7 – Supporting the Economy

For planning purposes the Welsh Government defines economic development as development of land and buildings for activities that generate wealth, jobs and incomes. Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services. The construction and energy sectors are also important to the economy and are sensitive to planning policies (PPW 7.1.1).

### The Welsh Assembly's key objectives for economic development include:

- Co-ordinate development with infrastructure provision
- Support national, regional, and local economic policies and strategies
- Align jobs and services with housing, wherever possible, so as to reduce the need for travel, especially by car
- Promote the re-use of previously developed, vacant and underused land
- Deliver physical regeneration and employment opportunities to disadvantaged communities.

**The Cefn & Cefn Mawr**, we have a disadvantaged community with a lot of Brownfield land for reuse that could once again provide local jobs and improving the environment in real terms.

*In applying these and other considerations, local planning authorities should aim to **steer economic development to the most appropriate locations**, rather than prevent or discourage such development (PPW 7.1.4).*

**The Cefn & Cefn Mawr** is one of those areas where a large transformational change can be brought about that satisfies all the goals of the LDP2 and the Welsh Spatial Planning Policy as stated.

*Effective planning for the economy requires local planning authorities to work strategically and co-operatively steering development and investment to the **most efficient and most sustainable locations**, regardless of which local authority area they are in. In addition, **travel-to-work patterns** do not necessarily respect local authority boundaries and it is essential that local planning authorities identify and make adequate provision for their role in the regional and sub-regional economies of Wales.*

*While some employment can be created in rural locations, **new development will be required in many areas**. New development sites are **likely to be small and should generally be located within or adjacent to defined settlement boundaries, preferably where public transport provision is established**.*

**This is Rhosymedre Industrial Estate**, unfortunately this is under used at present with a lot of vacant land and disused buildings. However with the provision of Cefn Railway Station it would be turned around and become a very busy place offering many more local jobs within walking distance of Cefn Mawr. By establishing Cefn Mawr as an urban / rural transport hub for South Wrexham, Dee Valley and Pontcysyllte WHS with a railway station between the Tesco Supermarket and the Rhosymedre Industrial Estate this will provide a much needed stimulus for land use at the Rhosymedre Industrial Estate. This will then encourage new business to set up because of the transport links and transform what is currently an underused industrial estate to one of the top performing sites in the county borough. Furthermore it is within walking distance of one of the largest communities in the Wrexham County.

#### PPW 7.1.1 indicates that development plans should:

- *Reflect work with neighbouring authorities and other relevant stakeholders to plan strategically for employment land provision*
- *Be underpinned by an up to date and appropriate evidence base to support policy choices and land allocations for economic development*
- *Using this evidence base, as far as is practicable set out an economic vision for the area, including a broad assessment of anticipated employment change by broad sector land use*
- ***Include policies relating to future development on existing employment sites to protect them from inappropriate development***
- *To encourage the regeneration and re-use of sites which are still suitable and needed for employment*
- ***Seek to promote and facilitate development that will deliver physical regeneration***
- *In safeguarding existing sites and providing new sites, prioritise sites that deliver appropriate job and training opportunities to disadvantaged communities*
- ***Concentrate development that attracts large numbers of people, including retail and offices, in city, town and village centres***

**Warning Comment:** Cefn Mawr has managed to preserve its traditional identity and can become a unique tourist attraction linked to the aqueduct increasing the tourist trade in the area, but if it is surrounded by new outlying retail parks and supermarkets it will be strangled to death.

## Planning Policy Wales - Planning for Retail and Town Centres

The Assembly Government's objectives (PPW 10.1.1) for retailing and town centres are to:

- *Secure accessible, efficient, competitive and innovative retail provision for all the communities of Wales, in both urban and rural areas.*
- ***Promote established town, district, local and village centres as the most appropriate locations for retailing, leisure and other complementary functions.***
- ***Enhance the vitality, attractiveness and viability of town, district, local and village centres.***
- ***Promote access to these centres by public transport, walking and cycling.***

Wherever possible this provision should be located in proximity to other commercial businesses, facilities for leisure, community facilities employment. **Town, district, local and village centres are the best locations for such provision at an appropriate scale (PPW 10.1.2).**

**Corner shops in urban areas, village shops in rural areas, and public houses** and other individual outlets with a retail function which are not part of established centres, can play a vital economic and social role and their loss can be damaging to a local community. Their role needs to be taken into account in preparing development plans (PPW 10.1.4).

**Response**, the application of the above is exactly what is required for the Cefn & Cefn Mawr to revitalise the traditional shopping centre as it once was. This is seen as a welcome break from the previous 30 years of outlying retail parks and supermarkets that rely on the private car to access. This was extremely limited thinking and has been at the cost of our traditional community centres for many years. One only has to walk around Wrexham & Oswestry or most town centres to see this today, in 2015. The PKC Group hope Cefn Mawr can be saved before it is destroyed by the latest unthinking round of retail outlets that have been proposed for the area.

*Local planning authorities should develop a clear strategy and policies for retail development which seek to achieve vital, attractive and viable centres. They should set out a framework for the future of town, district, local and village centres in their area which promotes a successful retailing sector supporting existing communities and centres.*

*Development plans should establish the existing hierarchy of centres, identify those which fulfil specialist functions and be clear about their future roles. Development plans should also identify changing pressures and opportunities and devise appropriate responses to them. In some situations it may be necessary to take pro-active steps to identify town or city centre locations for expansion. In others it may be necessary to identify measures to **reinvigorate centres**, or to manage decline in the relative importance of a centre as other centres expand. Dealing with change may mean redefining the boundaries of centres or identifying acceptable changes of use (PPW 10.2.1).*

**The Cefn & Cefn Mawr** being situated at the centre of the Pontcysyllte World Heritage Site between the two largest civil engineering constructions in the corridor, the Pontcysyllte Aqueduct and the Cefn Viaduct, and on the Chester to Shrewsbury main railway line, has the potential to become a "Hebden Bridge or Blists Hill" of the WHS, Wrexham County and North East Wales. Cefn Mawr has the potential to full fill that role for the County Borough as is being promoted by the PKC Group in the recommendations and proposals for the LDP2.

*Good access to, and convenient movement within, town centres are essential. Development plans should encourage the provision of good access to town and other centres for walkers and cyclists and for public transport, allowing for bus priority measures and public transport facilities. They should also encourage easy access to and within centres, and appropriate facilities, for people with limited mobility (PPW 10.2.6).*

**The Cefn & Cefn Mawr** was largely built before the age of the motor car and has lots of footpaths and retains many tramways with good gradients for cycling. The streets are narrow but with appropriate public transport services (mini bus) timed to coincide with trains at the Cefn Station in the centre of the community, this would form a working example of the desired goals of the LDP2. The transport hub would support further retail and commercial enterprise within the community.

However for this to work it should be remembered that this has to support the local economy, if large retail outlets operated by multi nationals are allowed to open up all around the place this will destroy any chance of such. Large retail chains and supermarkets remove money from the communities' economy and spoil the chances of sustainability.

*Local planning authorities should consider through their development plans whether new sites should be identified in town, district, local or village centres for retail development, leisure development or other uses best located in centres. Smaller scale retail provision, including appropriately sized supermarkets, leisure facilities, and other facilities such as local health centres, branch libraries, area offices of the local authority and primary schools should preferably be located in district, local and village centres (PPW 10.2.9).*

**Comment:** the local authority has to abide by this as too much destruction has been wrought by inappropriate retail parks and supermarkets being built all over the place for the last thirty years forcing a lot of local independent traders out of business. Cefn Mawr is currently surviving but another round of catering for conglomerates at the expense of our local traders will kill the village.

### PKC Statement for Local Traders and Multi Nationals:

**Local traders** are what they are, in general they work and live in the community. Hence they also tend to spend their wages or earnings at a local level and this helps to sustain the local economy.

**Large Supermarkets and Multi National Retail Chains do not.** This form of retailing removes money from the local economy like a vacuum cleaner, these retail outlets may provide some local employment but the profits go elsewhere, and as a small point, most likely out of Wrexham County.

Does anyone disagree?

*In deciding whether to identify sites for retail and leisure developments, local planning authorities should in the first instance consider whether there is a need for additional provision for these uses. Where the current provision appears to be adequate in quantity, the need for further allocations must be fully justified in the plan. This may be the case if new provision can be located where it (PPW 10.2.10);*

- *Is highly accessible by walking, cycling or public transport*
- *Contributes to a substantial reduction in car journeys*
- *Contributes to the co-location of facilities in existing town, district, local or village centres*
- *Significantly contributes to the vitality, attractiveness and viability of such a centre*
- *Alleviates a lack of convenience provision in a disadvantaged area*





Well Street in Cefn Mawr before the age of the car.....this old traditional village centre is within walking distance for the greater majority of our community, and was once a thriving busy village before the age of the car. To discourage the use of private transport, and get people to move to a greener life style producing less CO2 these traditional village centres need to be revitalised where ever suitable and possible. The village centre of Cefn Mawr still lies at the centre of the entire community of Cefn and can once again form the hub for the all the surrounding villages at the centre of the World Heritage Site, loosely referred to as the Cefn in this document.

*Where a need is identified for such new development, local planning authorities should adopt a sequential approach to the selection of sites. The sequential approach should also be used when allocating sites for the other uses best located in existing centres. **First preference should be for town centre locations**, where suitable sites or buildings suitable for conversion are available. If they are not available, then consideration should be given to amending the boundaries of existing centres so that appropriate edge-of centre sites are included. Where this is not practical, then district and local centres might be considered and, only then, out-of-centre sites in locations that are accessible by a choice of means of transport (PPW 10.2.11).*

**Comment**, this statement would seem to indicate a welcome end to the retail parks.

*Development plans should (PPW 10.2.13):*

- *Establish the strategic role to be performed by the main centres in the retail hierarchy*
- *Set out measures to reinvigorate particular centres, as appropriate*
- *Set out detailed policies to achieve vital, attractive and viable centres*

**The Cefn & Cefn Mawr** is at hierarchy level 2 in the LDP2 and certainly suits the above. However it needs protection from indiscriminate property development lead by mutli nationals and retail chains.

## Wrexham County Borough Council -Council Plan 2012-2016

*The Council Plan is an overarching plan setting out the Council's overall objectives and priorities for the performance and improvement of Wrexham County Borough. One of the four strategic themes is, 'creating a vibrant, diverse and inclusive economy'. The priority outcomes of which, as based upon the three main outcomes of the Economic Prosperity Strategy (WCBC 2012), are:*

- *People want to live, work, learn, visit and invest*
- *Businesses can locate and grow in the County Borough*
- *People can prosper as individuals and in their communities*

**Comment:** these are the reasons why we are saying what we are saying for the community of the Cefn & Cefn Mawr.

## Economic Prosperity Strategy (2012)

*The strategy re-evaluates the current economic circumstances facing the County Borough and through this evaluation identifies three, key desired outcomes for the economy:*

**Outcome 1** - *The strategy recognises the need to attract people and businesses to the area and acknowledges we need to build the right physical environment and the right image or 'profile.'*

**The Cefn & Cefn Mawr** can have a big impact here setting a shining example for the County of Wrexham and the Welsh Nation as a whole. There is potential to turn the depressed community still in the wake of the industrial closures around to one of a top tourist attraction that acts as a transport hub and commercial centre for South Wrexham, the Dee Valley and the Pontcysyllte World Heritage Site while meeting all the goals of the Welsh Spatial Plan and the LDP2.

**Outcome 2** - *The second part of the strategy recognises the need to support entrepreneurs and businesses, identify their training and skills gaps and develop business relationships.*

**The PKC Group** hope Wrexham County Borough Council are willing to work with them in the LDP2 which the PKC Group support for the betterment of the community of the Cefn & Cefn Mawr. Furthermore the PKC Group have already made a significant investment in the reconstruction of the community of Cefn & Cefn Mawr in both terms of financial commitment, time allocation and forward planning.

**Outcome 3** - *The third element of the strategy addresses the social aspect of economic development. The gap between the poorest and average households is wide, and widening.*

**Comment,** people need jobs and employment, and all PKC proposals and recommendations are designed to improve such opportunity for our community which is currently has one of the highest unemployment rates in the County of Wrexham.

## Destination Management Plan 2012-2017

*The key challenge for WCBC and the wider tourism and visitor economy is to boost visitor numbers and spend in the WCBC area. The Destination Management Plan identifies an ambitious shared vision and common goals for the future growth of the visitor economy of Wrexham County Borough (WCB). The priorities are investment in the key hubs of the:*

*World Heritage Site, Erddig Hall, Chirk Castle Chirk and the Ceiriog Valley.*

**The PKC Group** is concerned about the DMP because to date the community of the Cefn & Cefn Mawr has been left out. Although the Cefn & Cefn Mawr lies immediately adjacent to the Pontcysyllte Aqueduct and offers all that is needed for the area with the potential to expand without encroaching on green belt land the community has not been included apart from insignificant references.

A simple examination of both the ARUP Master plan for the Trevor Basin and the later Pleydell Smithyman proposal for the Pontcysyllte Aqueduct will confirm this, as do the very titles for such. Furthermore both of these schemes would have extreme difficulty in complying with the stated aims of the LDP2 and the WPP.

It is only since WHS inscription that the concept Cefn Mawr and the Aqueduct being two separate areas has been borne. However the local community do not see it this way as is reflected in the PKC Group Proposals. Our proposals will meet all the goals and are aimed at improving the whole area for all the villages central to the World Heritage Site, loosely called the Cefn in this document.

*Key elements of the spatial strategy include strengthening key hubs as a focus for investment for future employment and improving the quality and diversity of the economy, with a focus on high value manufacturing and services (Wales Spatial Plan)*

**The Cefn & Cefn Mawr** can be a key hub, with good road, rail and inland waterway access that will attract investment.

*To facilitate regeneration and promote social and environmental sustainability; co-ordinate development with infrastructure provision; support national, regional, and local economic policies and strategies; align jobs and services with housing, wherever possible, so as to reduce the need for travel, especially by car; promote the re-use of previously developed, vacant and underused land; and deliver physical regeneration and employment opportunities to disadvantaged communities (Planning Policy Wales 7.1.3)*

**Comment**, all this can be achieved at the **Cefn & Cefn Mawr**.

*Seek to promote and facilitate development that will deliver physical regeneration (Planning Policy Wales 7.5.1)*

**Comment**, this is what is needed for the Cefn & Cefn Mawr.

### Employment Land Availability

*Concentrate development that attracts large numbers of people, including retail and offices, in city, town and village centres (Planning Policy Wales 7.5.1)*

*Sufficient land for employment uses that are well served by infrastructure should be designated for employment in order to meet identified and unidentified needs. Such sites should be viable and deliverable. Provide targets on land provision for employment uses (Planning Policy Wales)*

*Promote established town, district, local and village centres as the most appropriate locations for retailing, leisure and other complementary functions (Planning Policy Wales)*

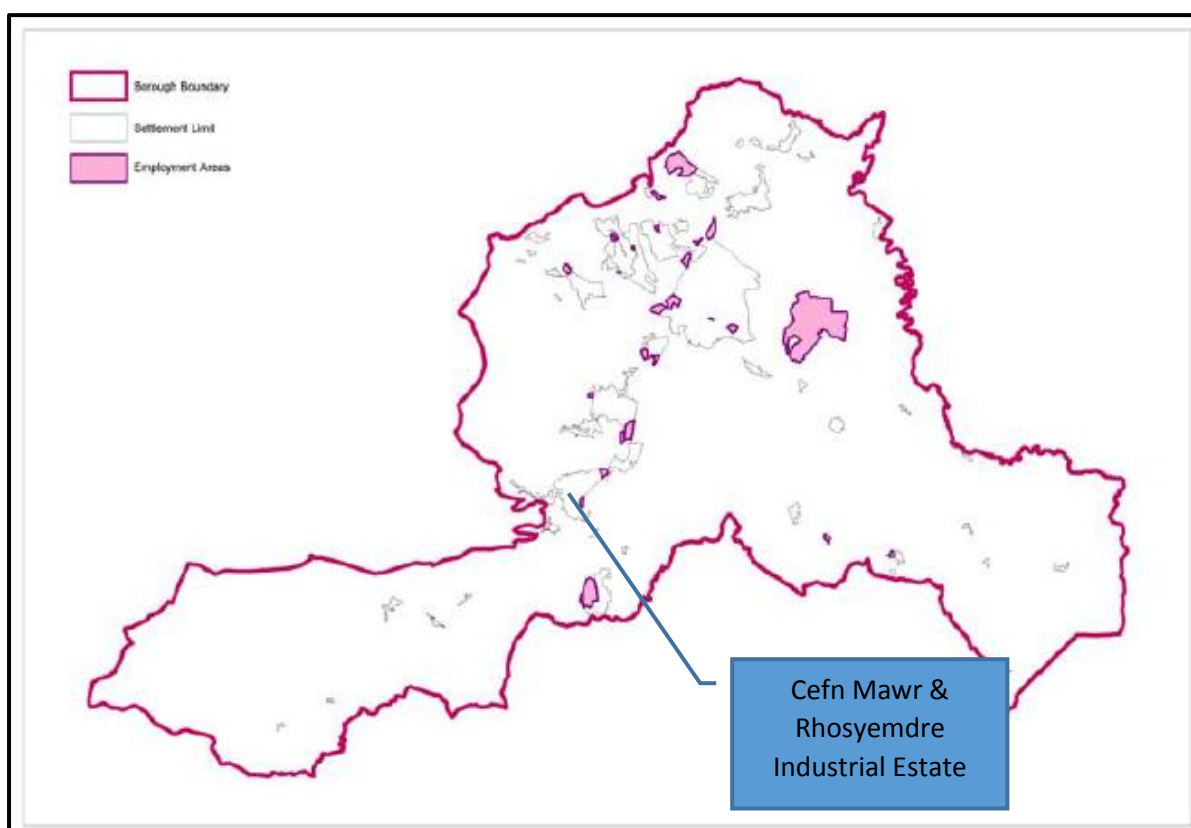
*Enhance the vitality, attractiveness and viability of town, district, local and village centres (Planning Policy Wales)*

*Promote access to these centres by public transport, walking and cycling (Planning Policy Wales)*

**Table 2**

Cluster	Vacancies <sup>1</sup>	Permissions <sup>2</sup>	Allocations <sup>3</sup>	Comments
1. Chirk and the Ceiriog Valley	None	None	None	No provision for future employment land in the cluster area.
2. North East Wrexham (Gresford and Rossett)	Rossett Business Park	None	Bluebell Lane, Gresford	
3. Coedpoeth and the North West	Limited office space but no industrial space at Five Crosses	Two permissions for expansion of existing uses (Minera Roof Trusses and Tomlinson's)	None	The only employment site in the cluster area is at full capacity.
4. Cefn Mawr/Acrefair	None	One permission to expand an existing use	2ha at Wynnstay and Advance Park	

**Please note** that in the above table from the LDP2 it indicates there are no vacancies at the Wynnstay / Rhosymedre Industrial Estate which is wrong. This site is virtually unused with only low level service industry present. Even the petrol station has closed, but may be reopened if Tesco could gain access. A railway station at Cefn Mawr would turn the fortunes of the estate around and new investment would follow, providing significant increases in local employment opportunity.

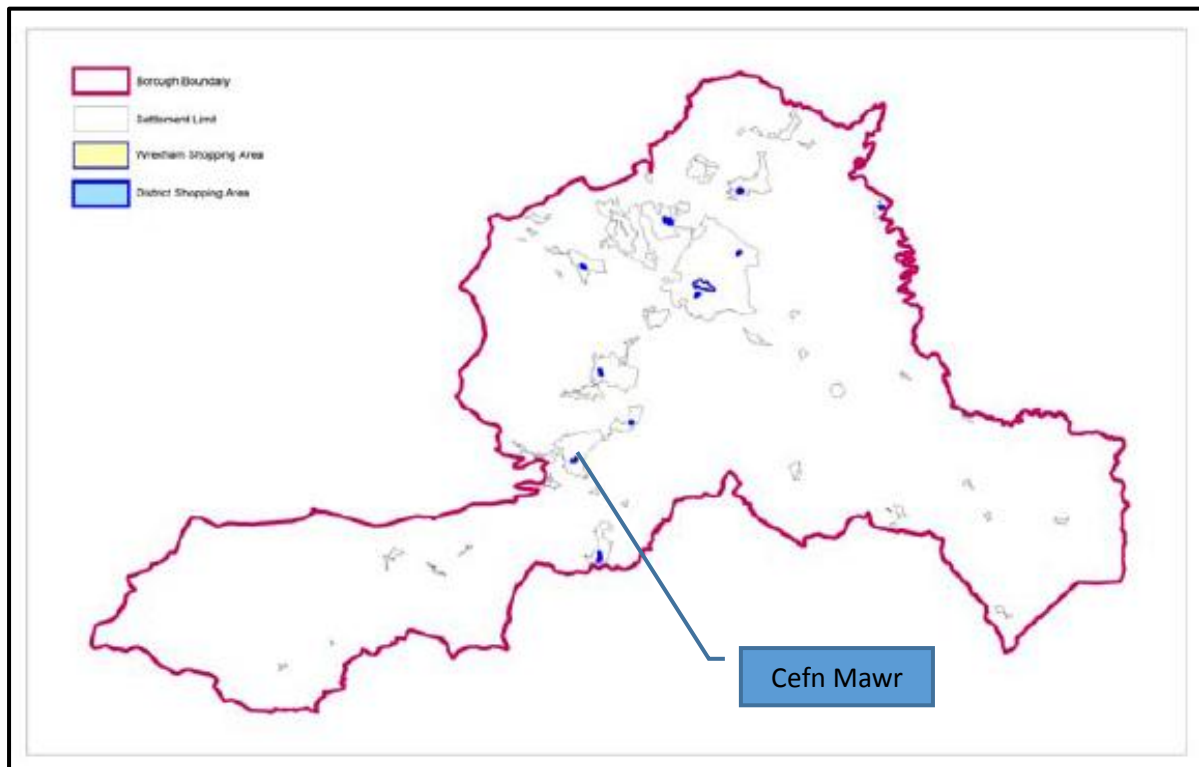


Wrexham is supported by a network of district centres that meet local need shopping or top up needs, in the Unitary Development Plan these are located in Borrass Park, **Cefn Mawr**, Chirk,



*Coedpoeth, Gresford, Gwersyllt, Holt, Penybryn, Ruabon and Rhos. These are typically small parades of local shops and services, though Borrass, **Cefn Mawr** and Gwersyllt have 'mini-supermarkets' providing a wider range of goods.*

**Comment,** this is obviously out of date, since the new Tesco Supermarket now dominates Cefn Mawr and is no 'mini-supermarket' having one of the highest store head counts at just under half a million annually. Unfortunately this has come at the expense of the local traditional shopping centre of Cefn Mawr on Crane Street and Well Street. The current financial stability of the local economic community is very weak after the closure of the main employers, Air Products and Monsanto and the opening of a large supermarket.



### Wrexham County Borough Retail Needs

*In retail planning a fundamental requirement is to establish 'need' for additional retail floor space based on predictions for consumer spending, population changes, spending leakages to other neighbouring authorities and other relevant economic trends. Information about need will inform the decision whether new retail space needs to be allocated and if so, it raises the question of where is the best location within the retail hierarchy.*

**PKC Comment:** Questions should be asked about the impact that such will make on the existing retail business community as there are only so many customers to go round with a finite spending ability. The constant barrage of supermarkets and retail parks is destroying our own retail economy. Surely this is what the Local Authority Planning Department should be doing, protecting the local economy. Unfortunately all too often the LA has been accommodating the multi nationals at the expense of the small trader. This has been called progress, and one of the main justifications has been more jobs created, which is a fallacy, as those jobs come at the expense of others.

### District Centre Issues

*A review of the district centres and evidence base will be required to determine the future role of the district centres to meet local needs. The review will need to consider local needs, current role, function, occupancy, and character, and shopping centre boundary, availability of development sites following a sequential search and relationship of the centre to the hierarchy. Opportunities for intervention, enhanced role, allocations or managing relative decline in the centres will be considered.*

### Opportunities to meet local need shopping

- *To support the long term prosperity of the County Borough there is a need to diversify the local and rural economy with a focus on high value manufacturing and services.*
- *The economy and employment growth should be supported alongside social and environmental considerations.*
- *The levels of employment and housing growth should be coherent to achieve sustainable patterns of development and to reduce the need to travel.*
- *Economic regeneration is required to rejuvenate some of the more deprived areas of the County Borough and to manage change.*
- *There is a need for more employment land for business development, but also a need to protect environmental assets and promote a sustainable economy.*
- ***The district centres perform important roles in sustaining local communities, meeting local needs and reducing the need to travel. The role of the centres should be supported and should not be undermined***

**Comment,** we support all these points in the LDP that should be applied to our community and the protection of. We would like to see WCBC follow these.

### Planning Considerations Identified

- *The development of the Western Gateway into a low carbon mixed use business-park, helping to attract hi-spec employers has great potential to achieve the economic aims for the County Borough.*
- ***The development of Pontcysyllte Aqueduct and Canal World Heritage Site as a tourist attraction has potential to regenerate a deprived community and diversify the local rural economy.***
- *Key visitor attractions, the World Heritage Site, Erddig Hall, Chirk Castle and the Ceiriog Valley and Wrexham town centre are key investment hubs.*
- *There is limited supply of employment land available for development in Chirk and the Ceiriog valley, Coedpoeth and the north-west.*
- *Wrexham town centre is supported by a range of district centres that are important for the provision of local services and employment; they perform important roles in sustainable communities and their roles and functions should be protected and enhanced. There are centres in Borrass Park, **Cefn Mawr**, Chirk, Coedpoeth, Gresford, Gwersyllt, Holt, Penybryn, Ruabon and Rhos.*

**Comment,** we would like to see these considerations applied to our community and actively support them. A show of such willingness is indicated by completion this document on such, by our group in support of our community and the LDP2.

However we are given cause to question whether this LDP2 is going to be applied across the board or just to certain sections of the community?

Please see this link regarding the latest planning approval for a huge retail park on the A483 in our area which clearly does not comply with the above and is destined to consume more green fields and require more use of the private motor car?

**The Leader 1<sup>st</sup> April 2015**

Huge retail, care and homes plan gets the go-ahead

<http://www.leaderlive.co.uk/news/146106/huge-retail-care-and-homes-plan-gets-the-go-ahead.aspx>



This is not an objection just a question, if property developers are allowed to plough up fields like these for their developments what chance do we have of remediating the Brownfield sites left in our community?

There is something fundamentally wrong here as this clearly goes against all the Welsh Assembly Government guide lines regarding planning and the proposed LDP2.

## Population and Housing Topic 7

### The Wales Spatial Plan (2008 Update)

*The scale of population growth that needs to be accommodated is challenging, with a projected growth of 330,000 persons across Wales between 2006 and 2031 (ONS, 2007).*

*The general principles for new housing growth are:*

- *It should be linked to public transport nodes, including walking and cycling networks.*
- *It should take account of environmental constraints, including flood risk.*
- *It should meet high standards of energy efficiency.*

*Housing developed near public transport nodes should be at higher than current densities to promote use of public transport and to increase opportunities for combined heat and power systems and accommodating appropriate development in smaller settlements and rural areas is vital for supporting the development of more rural communities.*

**The Cefn & Cefn Mawr** is an urban community at the centre of the rural communities of South Wrexham and by combining the transport systems available, footpath, canal, rail and road in both east west and north south directions, it will form a transport hub for South Wrexham.

### Key elements of the Welsh Spatial Plan & Strategy include:

- *Developing and supporting strategic hubs around Wrexham-Deeside-Chester.*
- *Focusing on areas in need of regeneration including the rural hinterland.*
- *Enhancing links between areas of opportunity and areas of need, particularly sustainable travel links.*
- *Identifying and developing complementary future roles of settlements and centres within the region.*
- *Protecting and enhancing sensitive areas of natural, built and historic importance.*

**Comment**, all these key elements are applicable to the Cefn & Cefn Mawr.

### Planning Policy Wales Edition 6 (2014)

*The Welsh Assembly Government will seek to ensure that:*

- *Previously developed land is used in preference to Greenfield sites.*
- *New housing and residential environments are well designed, environmentally sound (especially energy efficient) and make a significant contribution to promoting community regeneration and improving the quality of life.*
- *Development that is easily accessible by public transport, cycling and walking.*
- *The overall result of new housing development in towns and villages or edge of settlement is a mix of social and market housing that retains and, where practical, enhances important landscape and wildlife features in the development.*
- *Attractive landscapes around development with usable open space and regard to biodiversity, nature conservation and flooding.*



*In identifying sites to be allocated for housing in development plans, local planning authorities should follow a search sequence, starting with the re-use of previously developed land and buildings within settlements, then settlement extensions and then development around settlements with good public transport links.*

*Local planning authorities should consider the following criteria in deciding which sites to allocate for housing in their development plans:*

- *The availability of previously developed sites and empty or underused buildings and their suitability for housing.*
- *The location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility.*
- *The capacity of existing and potential infrastructure to absorb further development, and the cost of adding further infrastructure.*
- *The scope to build sustainable communities to support new physical and social infrastructure.*
- *The physical and environmental constraints on development of land.*
- *The compatibility of housing with neighbouring established land uses.*
- *The potential to reduce carbon emissions through co-location with other uses.*

**Comment,** all these points suit the **Cefn & Cefn Mawr** with its Brownfield sites and potential as a transport hub for South Wrexham at the centre of the Pontcysyllte World heritage Site.

*It is important to recognise that development in the countryside should embody sustainability principles benefitting the rural economy and local communities while maintaining and enhancing the environment. To safeguard the character and appearance of the countryside, reduce the need to travel by car, economise on the provision of services new houses away from existing settlements or areas allocated for development must be strictly controlled.*

## Infrastructure Topic 8

### Water

*Maintaining and upgrading water infrastructure is the responsibility of regulated water and sewerage or water only companies. Key drivers for investment are:*

- *Ensuring compliance with statutory obligations (including many European obligations) for drinking and environmental water quality*
- *Managing water resources and water availability and ensuring security and resilience requirements are complied with.*

*Dee Valley Water is in early stages of preparing AMP6 which is due to be sent to Ofwat in spring 2014 covering the investment period 2015-2020. In preparing AMP6, WCBC Planning supplied DVW with Welsh Government Population projections. In discussion with DVW, the following has been identified as an issue for potential investment:*

- *There may be a need for an additional reservoir in Acrefair.*

*The AMP5 investment plan identified investment in waste water treatment at Five Fords Wrexham, Cefn Mawr and Coedpoeth.*

*While consultation on the first Local Development Plan 2006-2021, is not directly relevant to this LDP, the response from Welsh Water help identify capacity constraints that may be of value in shaping the spatial strategy. The following constraints were identified;*

*There are capacity issues at Cefn Mawr. This would have implications for the re-development of the former Flexsys site which may need to wait until Waste Water Treatment works were upgraded in an AMP or the developer must fund their own upgrade. The Flexsys site may require phasing until the end of the plan period to tie in with Welsh Water investment plans.*

*Another issue that arose from consultation on the first LDP revolves around the conflict arising from Welsh Water's duty to protect the environment and its duty to supply water to domestic users. Water companies have a statutory duty to connect domestic users to the waste water network regardless of capacity at local treatment works. If a new housing development exceeded current capacity and there are no investment plans to meet the demand the connections would still need to be made. Consequently there is a risk water quality may suffer with implications for European Designated wildlife sites such as the River Dee SAC. It is important for water services and for the integrity of environmental resources that water companies can plan investment to ensure that capacity meets demand.*

**Comment:** could the water treatment plant for the ex Monsanto works not be used to treat waste water from the community?



## Telephone

*British Telecom (BT) has a statutory obligation to supply capacity as and when required. When a new housing or employment development is built, infrastructure requirements will be met by BT. The main service issues relate to the availability and speed of broadband, issues recognised by the WG in PPW paragraph 12.1.4.*

*Broadband is a high speed Internet service enabling users to download files, view television programmes and films, take part in video conferencing and online gaming and access a wide range of other media, information and services online but not all households are able to receive a broadband service. While BT currently offers up to 16meg speeds within Wrexham, there are areas significantly slower and customer demand is requiring better performance.*

*Distance from the exchange is critical, with speed performance best within 5km of an exchange; this means that broadband speed is significantly slower in rural areas such as parts of the Ceiriog valley and the Maelor.*

*BT are investing in super-fast broadband (up to 24mb) and have upgraded the Wrexham North and Gresford exchange to provide new services from June 2012, however this is limited to around 15,000 homes and businesses.*

*The Welsh Government is embarking on a programme to facilitate the deployment of a broadband infrastructure capable of delivering fast and ultrafast broadband services to 100% of premises across Wales. The Economic Renewal Programme aims to provide every business in Wales with access to next-generation broadband by the middle of 2016 and domestic premises by 2020 at a minimum speed of 30 Mbps.*

**Comment:** the sooner the better.

## Gas

*Wales and West Utilities are the owner, operator and developer of the gas distribution system in most of Wales including Wrexham. The Distribution Network receives gas from fifteen National Transmission Off-takes around the Network and transports it to the meters of more than 2.3 million industrial, commercial and domestic consumers. They are responsible for operating the distribution network and making new connections. There is an off-take facility at Maelor that draws from the grid system for local supply.*

*Wales North is expected to experience a 7.3% reduction in annual demand by 2022 compared to previously estimated 8.6% reduction over the 10 year period. This decrease is influenced by factors such as an increase in general fuel prices, coupled with increased energy efficiency measures.*

*There is a Gas Power Station enquiry in progress at Bryn Lane, Wrexham, however, as it stands, no new load growth investment has been confirmed for the forecast period of 2013-2022. However there are operational pressures with a growing requirement to facilitate renewable and other forms of gas (e.g. coal bed methane) into the Gas Network.*

## Electricity

*The National Grid delivers electricity to the county borough but end users are able to choose their actual supplier. The National Grid operates the 400kV and 275kV high voltage distribution network across the UK. The generating companies supply the power into the system and the distributors feed it to individual consumers. The National Grid is responsible for ensuring that demand and generation balance. During consultation on the 2006 version of the Local Development Plan the National grid did*

*not raise any capacity issues relating to the planned growth levels or spatial strategy, nor did they highlight the need for additional network development in the county borough to serve other local authority areas. However the National Grid informed WCBC that they reserve right of access to their distribution network, and in planning development, we need to account for access to overhead lines.*

*Supply into the National Grid comes from a number of different suppliers but none of them have power stations within the county borough.*

*Scottish Power Energy Networks are the local distributor connecting the National Grid to individual properties; they are responsible for restoring supply, making new connections and maintaining the performance of the network. During consultation on the 2006 version of the Local Development Plan, Scottish Power raised concern that essential network improvement works may be required to meet the growth strategy of the plan and to meet pressures from renewable energy production. National Grid raised similar concerns with regards to essential infrastructure development outside of settlement limits. Both companies request the LDP to support essential improvements which may be required outside of settlement limits and reconcile this support with other policies such as landscape protection.*

*The sustainability issues for Infrastructure are:*

- 1. Locating development where there is insufficient infrastructure capacity or an ineffective mechanism to address capacity constraints is unsustainable.*
- 2. Development can make a positive contribution to community sustainability by facilitating new infrastructure previously lacking.*
- 3. Due to viability issues, development may not be able to fund all necessary infrastructures to support the development or local communities.*
- 4. Where development is not capable of supplying all the desired infrastructure needs a set of priorities will be required to ensure the most important infrastructure can be supplied.*
- 5. Increased demand for water, water abstraction, arising from development and its impact on designated environmental sites, particularly the River Dee, is a key issue.*



## Climate Change & Energy Topic 9

*Our current patterns of energy use are unsustainable and are having a huge impact in terms of contributing to climate change, an insecure energy supply and fuel poverty. The Government has recognized the need for change and is seeking an 80% reduction (from 1990 levels) in carbon dioxide emissions by 2050. Strong and early action is required, with an emphasis on reduced demand, energy efficiency and the promotion of low carbon technologies, particularly from decentralized sources.*

*The Local Development Plan must seek to provide planning policies that will facilitate the conditions to move towards low carbon lifestyles. This will need to be achieved in line with the principles of sustainable development, ensuring that economic, social and environmental objectives are secured together.*

### Climate Change Act 2008

*Climate change and energy security are key priorities of both the UK and Welsh Governments. The use of fossil fuels is seen as a major contributor to greenhouse gas emissions and a major cause of global climate change. Moving towards a low carbon energy based economy is a Government priority as a means to tackle the causes of climate change and improve energy security. The generation and use of renewable and low carbon energy sources has a key role to play in this and the UK Government is committed to meeting the EU target of 15% of energy from renewable sources by 2020.*

*The Act gives the UK government a statutory duty to reduce greenhouse gas emissions by 80% between 1990 and 2050, and by at least 34% by 2020. It also establishes a carbon budgeting system which caps emissions over five year periods.*

*The LDP should play its part in delivering these targets by:*

- *Promoting renewable methods of energy production and their use in new development*
- *Promoting energy efficiency and energy conservation in new development*
- *Promoting other measures that mitigate the causes of climate change (e.g. the protection/enhancement of carbon sinks)*
- *Ensuring that the location and design of new development has regard to the potential risk, causes and consequences of flooding*
- *Locating and designing development so as to minimize travel demand, particular by cars and other motor vehicles, and where it is accessible by a range of forms of travel/transport*

### The Planning and Energy Act, 2008,

*This enables local planning authorities in Wales to set reasonable requirements in the LDP for the generation of energy from local renewable sources and low carbon energy and for energy efficiency. The Act is complemented by the policies contained in PPW that cover such issues and provides a legal basis for the implementation of LDP policies against the national framework. The Act requires that LDP policies must not be inconsistent with relevant national policies, and the new powers of local planning authorities under the 2008 Act are also subject to the requirements of section 62 of the Planning and Compulsory Purchase Act 2004.*

## Climate Change Strategy for Wales (WAG, 2010)

*This sets a greenhouse gas reduction target of 3% per year on all emissions except heavy industry and power generation, with overall reductions of at least 40% by 2020. Areas of focus will be:*

- *Behaviour change resilient to climate change*
- *Leading by example by WAG and the public sector*
- *Increased energy efficiency, making low carbon transport a reality, and building the skills needed to ensure that Wales can make the most of opportunities from a low carbon economy*
- *Ensuring that approaches to R&D, technology, innovation and skills help Wales gain maximum benefit from climate change related business and research*
- *Supporting adaptation*
- *Ensuring that land use planning promotes sustainable development and enables a move towards a low carbon economy.*

*The LDP should:*

- *Ensure that buildings are energy efficient, and in sustainable locations*
- *Support the development of renewable energy*
- *Support local food production*
- *Encourage low carbon and resource efficient businesses*

## A Low Carbon Revolution - Energy Policy Statement (2010)

*The Energy Policy Statement sets out Welsh Governments sustainable development framework to accelerate the transition to an efficient low carbon based economy. Set in the context of increasing greenhouse gas emissions, in addition to increasing uncertainty about the future availability of fossil fuel resources, the Statement sets three objectives, as follows;*

- *To maximise energy savings and energy efficiency in order to make producing the majority of the energy we need from low carbon sources more feasible and less costly.*
- *To meet our energy needs securely from low carbon sources. We will move to resilient low carbon energy production via indigenous (and thus secure) renewables, on both a centralised and localised basis.*
- *To ensure that the transition to low carbon maximises the economic renewal opportunities for practical jobs and skills, strengthens and engages our research and development sectors, promotes personal and community engagement and helps to tackle deprivation and improve quality of life.*

*The LDP should:*

- *Help to support a step-change in the energy efficiency performance of all housing stock*
- *Progressively increase the standards for new-build housing towards zero carbon aspirations*
- *Support small-scale renewable developments and other forms of local energy generation*
- *Support anaerobic digestion, biomass, and other larger renewable energy generation projects*

*Based on Wales' natural advantages in areas such as wind and marine renewable resources, Welsh Governments aim is to renewably generate up to twice as much electricity annually by 2025 as is used today and by 2050, at the latest, be in a position where almost all of our local energy needs, whether for heat, electrical power or vehicle transport, can be met by low carbon electricity production.*

## Carbon Emissions

*Climate change is probably the greatest long-term challenge facing the human race, and is a serious and urgent issue. The climate is already beginning to change as a result of past greenhouse gas emissions and this trend shows no sign of abating. Publications by Nicholas Stern (2006) and Intergovernmental Panel on Climate Change (IPCC) (2007) highlight the urgent need to take action now.*

*Globally, greenhouse gas emissions have increased steadily since the industrial revolution. The Stern Report states that greenhouse gas concentrations in the atmosphere now stand at around 430ppm CO<sub>2</sub> equivalent, compared with only 280ppm before the Industrial Revolution. The stock is rising, driven by increasing emissions from human activities, such as energy generation, increased amounts of movement and land-use change. Emissions have been strongly correlated with GDP across time and countries, although this is now changing. UK emissions of the 'basket' of six greenhouse gases covered by the Kyoto Protocol decreased by 24.9% in 2012 on the baseline figures, some of which is probably due to the effects of the economic recession (DECC UK emission statistics, 2013).*

*Carbon dioxide (CO<sub>2</sub>) accounts for most greenhouse gas emissions, and is the only gas measured on a local authority basis. In WCBC, CO<sub>2</sub> emissions decreased by 18% between 2005 and 2011. About 60% of WCBC's CO<sub>2</sub> emissions are generated by industry, 24% by domestic uses, and 16% by traffic.*

## Main Sustainability Issues & Considerations Identified

*The per capita carbon emissions in the County Borough are significantly higher than the Welsh and UK averages, however this figure is skewed by industrial outputs as Wrexham has a disproportionate amount of industry.*

***Transport is a significant contributor to carbon emissions and road transport accounts for almost all transport carbon emissions in the County Borough. Promoting more sustainable travel modes can significantly reduce these emissions.***

*Renewable energy generation can contribute to a reduction in carbon emissions, national government is committed to a significant contribution to energy supply from renewable sources and the planning system is tasked with optimising renewable energy production.*

*Local level generation is applicable anywhere, consideration of the impact of these in sensitive locations such as the AONB, World Heritage Site and its buffer zone and other heritage, design and landscape sensitive locations will need to be considered.*

***Locating development where there is good accessibility by public transport, walking and cycling to services, jobs and retail will provide the best opportunities to reduce the need to travel.***

**Comment:** the most appropriate way for the Cefn & Cefn Mawr in the Pontcysyllte World Heritage site and next to the AONB to respond to climate change is to establish itself as a transport hub for South Wrexham, the WHS and Dee Valley. This will promote more investment and facilities within walking or cycling distance to use locally or encourage more people if going further afield to travel on well-timed and efficient by public transport services.

## Transport Topic 10

### Planning Policy Wales Edition 6 (2014)

*The transport objectives of the Welsh Assembly Government are to extend choice in transport and secure accessibility in a way which supports sustainable development and helps tackle the causes of climate change by:*

- *Encouraging a more effective and efficient transport systems.*
- *Greater use of the more sustainable and healthy forms of transport.*
- *Minimising the need to travel.*

***The Welsh Government supports a transport hierarchy in relation to new development that establishes priorities in such a way that, wherever possible, that they are accessible first by walking and cycling, then by public transport, and finally by car.***

*Land use planning can help to achieve the Welsh Government's objectives for transport through:*

- *Reducing the need to travel, especially by private car.*
- *Locating development where there is good public transport access.*
- *Locating development near other related uses to encourage multipurpose trips and reduce the length of journeys.*
- *Improving accessibility by walking, cycling and public transport.*
- *Ensuring that transport is accessible to all, taking into account the needs of disabled and other less mobile people.*
- *Supporting traffic management measures.*
- *Ensuring that, as far as possible, transport infrastructure does not contribute to land take, urban sprawl or neighbourhood severance.*

*The development plan should:*

- *Set out the land use / transportation strategy, addressing accessibility and the provision of strategic and integrated transport facilities, including roads, **railways and interchanges**.*

**Comment:** this document does exactly that for the Cefn & Cefn Mawr.

- *Ensure that new housing, jobs, shopping, leisure and services are highly accessible by public transport, walking and cycling.*
- *Encourage higher density and mixed-use development near public transport nodes, or near corridors well served by public transport.*
- *Ensure that development sites which are highly accessible to non-car modes are used for travel intensive uses, reallocating their use if necessary.*

**Comment:** this document does exactly that for the Cefn & Cefn Mawr.

- *Locate major generators of travel demand within existing urban areas, or in other locations that can be well served by public transport, walking or cycling.*
- *In rural areas, designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development.*



**Comment:** this is the Cefn & Cefn Mawr, which lies at the centre of the Pontcysyllte World Heritage Site.

- *Include specific measures to promote walking and cycling.*
- *Set out policies to promote the use of public transport including new and improved interchange facilities and, where appropriate, park and ride schemes.*
- *Include appropriate traffic management policies.*
- *Identify the primary road network, including trunk roads, and separately identify the core network.*

**Comment:** this is the Cefn & Cefn Mawr, which lies at the centre of the Pontcysyllte World Heritage Site and on the East West A5 & A539 junction with the North South Chester to Shrewsbury Railway Line, A483, Offas Dyke Footpath and Llangollen Canal. With ample opportunity for park and ride schemes to reduce CO2 emission.

- *Identify proposals for new roads and major improvements to the primary route network and the broad policy on priorities for minor improvements.*
- *Include policies and proposals relating to the development of transport infrastructure other than roads.*
- *Identify, and where appropriate protect, routes required for the sustainable movement of freight.*

**Comment:** this is all applicable to the Cefn & Cefn Mawr.

- *Protect disused transport infrastructure, including railways, rail sidings, ports, harbours and inland waterways from development that would compromise their future transport use, where re-use is a possibility.*
- *Minimise the adverse impacts of transport infrastructure projects on the natural, historic and built environment and on local communities.*

**Comment:** this is directly applicable to the Cefn & Cefn Mawr and the available infrastructure in the area.

### People, Places, Futures, Wales Spatial Plan (2004) and Update (2008)

*Identified below are certain key statements from the Spatial Plan Update relating to transport in North East Wales.*

- *Strengthening key hubs and supporting locally accessible jobs and services outside these hub areas.*
- *The importance of cross border linkages to Chester and West Cheshire, Wirral, Liverpool and Warrington / Manchester / Birmingham and the West Midlands.*

**The Cefn & Cefn Mawr** not only offers the best option for a local transport hub for South Wrexham but also combines the option of cross boarder linkages for work in other areas, securing work from other areas and the import of tourism to North East Wales top tourist attraction, the Pontcysyllte Aqueduct at a central location.

- *Reducing the impact on the environment and protected areas.*
- *Sustainable solutions to the needs of freight traffic across North Wales.*
- *Efficient, effective and sustainable connectivity between key settlements, education and employment areas.*
- *Role of transport in supporting tourism.*
- *Resilience of the transport network*

**In the Cefn & Cefn Mawr** no new construction is needed as such other than reinstating former transport routes and facilities. This will simply achieve all the desired goals of the Welsh Special Plan as indicated above without encroachment on green belt land.

### Wales Transport Strategy (2008)

*The long term outcomes are split into three domains, social, economic and environmental.*

- *Social - Improve access to healthcare, education, training, lifelong learning, shopping and leisure facilities; encourage healthy lifestyles; improve the actual and perceived safety of travel.*
- *Economic - improve access to employment opportunities; improve connectivity within Wales and internationally; improve the efficient, reliable and sustainable movement of people and freight; and improve access to visitor attractions.*
- *Environmental - increase the use of more sustainable materials; reduce the contribution of transport to greenhouse gas, air pollution and other harmful emissions; adapt to the impacts of climate change; improve the impact of transport on the local environment, on our heritage, transport and biodiversity.*

**Cefn & Cefn Mawr Transport Hub for South Wrexham** would simply achieve all the above outcomes for South Wrexham, the Pontcysyllte WHS and the Dee Valley.

1. Cefn Mawr still has good medical facilities that will improve with an upturn in the local economy when Cefn Mawr is set up as the urban / rural transport hub for South Wrexham. Furthermore there will also be a similar improvement across the social base as opportunities increase and private enterprise invests back into the community.
2. By setting up Cefn Mawr as the transport hub for South Wrexham, Pontcysyllte WHS and Dee Valley this will result in a far greater movement of people by public transport. They will be both travelling outside the area seeking work elsewhere and into the area as visitors to the historically important industrial villages of the Cefn, Cefn Mawr, Cefn Viaduct, Ty Mawr Country Park and Pontcysyllte Aqueduct at the centre of the Pontcysyllte World Heritage Site.
3. The best way to get people to use public transport and reduce CO2 emission is to make it convenient and easy to use. A railway station at the centre of Cefn Mawr would be within walking or cycling distance of a large proportion of South Wrexham's population. The villages of the Cefn represent the largest population outside Wrexham. Furthermore a well-timed and coordinated local bus service linked into train times would serve to encourage larger numbers of people onto public transport. This would then be very similar to the highly successful MRT system in Singapore at a fraction of the cost.

4. Since all that is required is the reinstatement of former facilities this will not infringe on heritage, Greenbelt land or biodiversity, but rather effect an improvement in all areas by reducing CO2 emission and subsequent acid rain formation while reinstating former heritage for its original purpose.

*In delivering the transport strategy priority actions are:*

- *Reducing greenhouse gas emissions and other environmental impacts from transport.*
- *Integrating local transport.*
- *Improving access between key settlements and sites.*
- *Enhancing international connectivity.*
- *Increasing safety and security.*

**Cefn & Cefn Mawr** as a transport hub will reduce greenhouse gas emission impact by encouraging more people to use well timed and integrated public transport service between key settlements such as Wrexham, Chester & Shrewsbury whilst also enhancing international connectivity between the Pontcysyllte WHS and Birmingham International Airport. Furthermore as an additional point a transport hub orientated around Cefn Railway Station situated between Tesco and Rhosymedre Industrial Estate will spur a dramatic upturn in the commercial success and employment levels on the Rhosymedre Industrial Estate as companies locate there due to good road and rail access.

### National Transport Plan (WG 2010)

*Building on the priority areas identified in the Wales Transport Strategy the NTP has the following aims;*

- *To continue to establish sustainable travel centres across Wales.*
- *Integrate the impact of travel into wider decision making.*
- *Increase healthy and sustainable travel choices, including walking and cycling - make it easier for people to be less reliant on the private car and to use public transport, walking and cycling more frequently.*
- *To improve the quality and integration of local bus services.*
- *Improve the provision of, and access to, rail services, including improvements for disabled people and vulnerable users.*
- *Improving access to key sites and services - enable people to access key sites and services more sustainably, particularly where access is currently difficult.*
- *Managing our road infrastructure - operate, improve and maintain the trunk road network to meet our statutory obligations and deliver our strategic objectives.*
- *Improving the safety of the road network - continue to improve the safety of the road network, with special emphasis on reducing casualty rates of vulnerable users.*
- *Improving the sustainability of freight transport - improve the sustainability of freight movements, including supporting the modal shift of freight from road to rail where environmental, economic and social benefits can be achieved.*
- *Improving the sustainability of transport infrastructure and reducing environmental effects - Use sustainable construction and maintenance methods to reduce the environmental effects of the transport infrastructure for which we are responsible.*

**Comment:** again setting the **Cefn & Cefn Mawr** up as the **transport hub** for South Wrexham, the Pontcysyllte World Heritage Site and the Dee Valley will achieve these aims.

## Taith North Wales Regional Transport Plan (2009)

*The North Wales Regional Transport Plan Priorities are:*

- *Efficiently meeting North Wales' diverse transport needs*
- *Improve passenger transport profile and performance*
- *Reducing congestion and journey times*
- *Supporting development of towns and other key centres*
- *Safe, efficient, sustainable transport networks*
- *Improving rail services for North Wales*
- *Environmentally-friendly and efficient freight*
- *Smart traffic planning and management*
- *Sustainable transport - Increasing current levels of cycling and walking by residents and visitors*

**Comment:** again setting the **Cefn & Cefn Mawr** up as the **transport hub** will contribute to all of this.

## Active Travel (Wales) Act 2013

*The Welsh Government want to make walking and cycling the most natural and normal way of getting about. "We want to do this so that more people can experience the health benefits; we can reduce our greenhouse gas emissions; and we can help address poverty and disadvantage. At the same time, we want to help our economy to grow, and take steps to unlock sustainable economic growth. This can be done through more people walking and cycling, as it will reduce congestion, reduce the number of days lost through sickness and support the cycling and tourism industries in Wales.*

**Comment:** if the WCBC is willing to work with us and adopt the concept of Cefn Mawr being a transport hub for South Wrexham with Cefn Railway Station at the centre between Tesco and the Rhosymedre Industrial Estate then the PKC Group with Tesco will be looking to provide a large cycle storage facility for park and ride at the station. The PKC Group are also seeking backers within the rail industry.

*The Act sets out requirements for Local Authorities in Wales to:*

- *Identify and map the network of routes within their areas that are safe and appropriate for walking and cycling.*
- *Identify and map the enhancements that would be required to create a fully integrated network for walking and cycling and develop a prioritised list of schemes to deliver the network.*
- *Deliver an enhanced network subject to budget availability and following due process.*
- *Consider the potential for enhancing walking and cycling provision in the development of new road schemes.*
- *Enhance walking and cycling provision in new road schemes unless it would be unreasonable to do so and have regard to the needs of walkers and cyclists in exercising a range of highway authority functions.*
- *Do this in a manner that will promote active travel journeys.*

*The first three points will only apply in settlements that are specified in a Direction to be made by the Welsh Ministers. The local settlements for the proposed Direction are; Wrexham Built Up Area – BUA (comprised of Built Up Area Subdivisions of Bradley, Rhostyllen and Wrexham BUASDs), Rhosllanerchrugog BUA (**Cefn Mawr**, Rhosllanerchrugog, Ruabon, **Trevor** BUASDs).*



### Wales Infrastructure Investment Plan (2012)

*For the next few years the Government's policy is to put more emphasis on growth-promoting economic policy and on generating employment. Welsh Governments investment in infrastructure must reflect that priority, consequently the vision for the Infrastructure Investment Plan is to boost jobs and growth.*

*Transport can help deliver economic infrastructure by delivering networks that support economic activity such as roads, the transport system can also help tackle poverty and increase wellbeing. Key transport interventions are:*

- *Roads; Prioritise investment which contributes to economic growth – addressing urban congestion and improving access to key areas and improving the capacity of key east-west routes.*
- *Rail, give strategic direction and procure services and projects.*

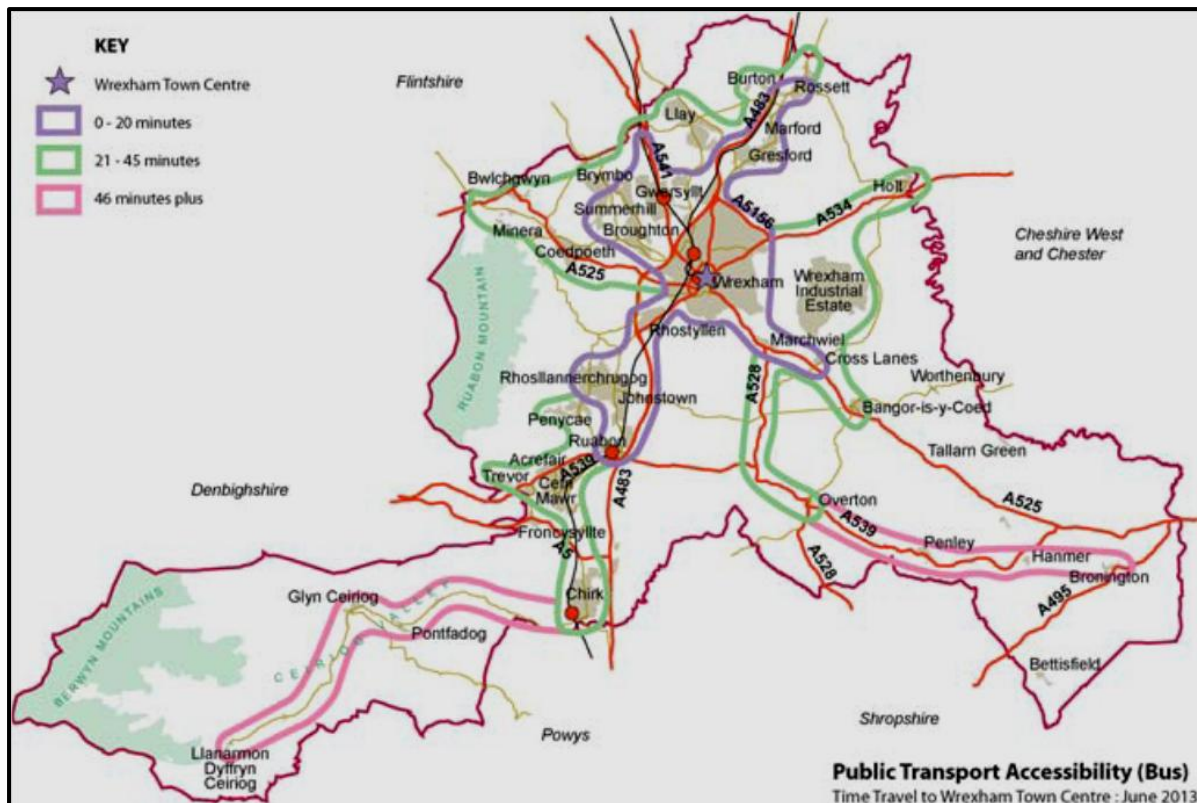
**Comment:** again setting the **Cefn & Cefn Mawr up as the transport hub** will in addition to providing a viable public transport link to other areas for employment it would also serve to:

- To the east of Cefn Mawr Rhosymdre Industrial Estate would see a dramatic uptake in land usage as new commercial activity moved onto the estate as a result for good transport connectivity by road and rail.
- This would increase employment opportunities for local people that could literally walk to work, a stated objective of both the LDP2 and WAG.
- How many Industrial Estates can be directly accessed in Wrexham without laying new track?
- The railway line connects to the national and international tourist market to bring people to the Pontcysyllte World Heritage Site, which again will be reflected in the number of people employed in the tourist sector.
- The cohesion of Cefn Mawr and the Pontcysyllte Aqueduct with the development of Windborne Gate Parking, Jessop's Tramway and the Plas Kynaston Canal will only serve to increase the visitor count to the west of Cefn Mawr and further job opportunities in the tourist, catering and retail sectors.
- In parallel to this we will see a renaissance of the traditional shopping centre in Cefn Mawr resulting in increased employment prospects in the retail sector and a general uplift of the economy of the Cefn.

Please note the above are sustainable employment prospects for the community, but during the construction & restoration phases short term employment will be available for a local labour force and tradesmen.

A stated aim of the PKC Group which has been practiced as far as possible is to use local labour on all its projects and one which will be pursued in the future. We practice what we preach because it makes sense, other we wouldn't bother saying it!

Not only are we saying this we are currently working on this and will complete the Holly Bush Inn Restoration in 2015 and hopefully the Cefn Mawr & Tesco Permeability Project in 2016. If our submission to the WCBC for the Ebenezer is successful we also hope to reopen that in the near future. However this is also subject to increasing the foot fall in the Cefn & Cefn Mawr which can be achieved by working with us and adopting our proposals in the LDP, and practical implementation.



### Sustainable Transport

More sustainable forms of transport offer opportunities to reduce carbon emissions make more efficient use of the existing transport infrastructure and help address issues of health, poor exercise levels and accessibility.

### Walking and Cycling

In North Wales 21% of the Workplace population live within 2km of their employment site, however, only 10.4% travel to work on foot. A further 16% live within 5km and yet only 1.8% of the total workplace population choose to cycle to work. Whilst the opportunity to walk and cycle is available to those living in close proximity to work, few choose these options as modes of transport.

### Rail Passenger Services

A recently completed rail study (the North Wales Rail Strategy Study) undertaken for Taith has identified opportunities for rail service enhancements.

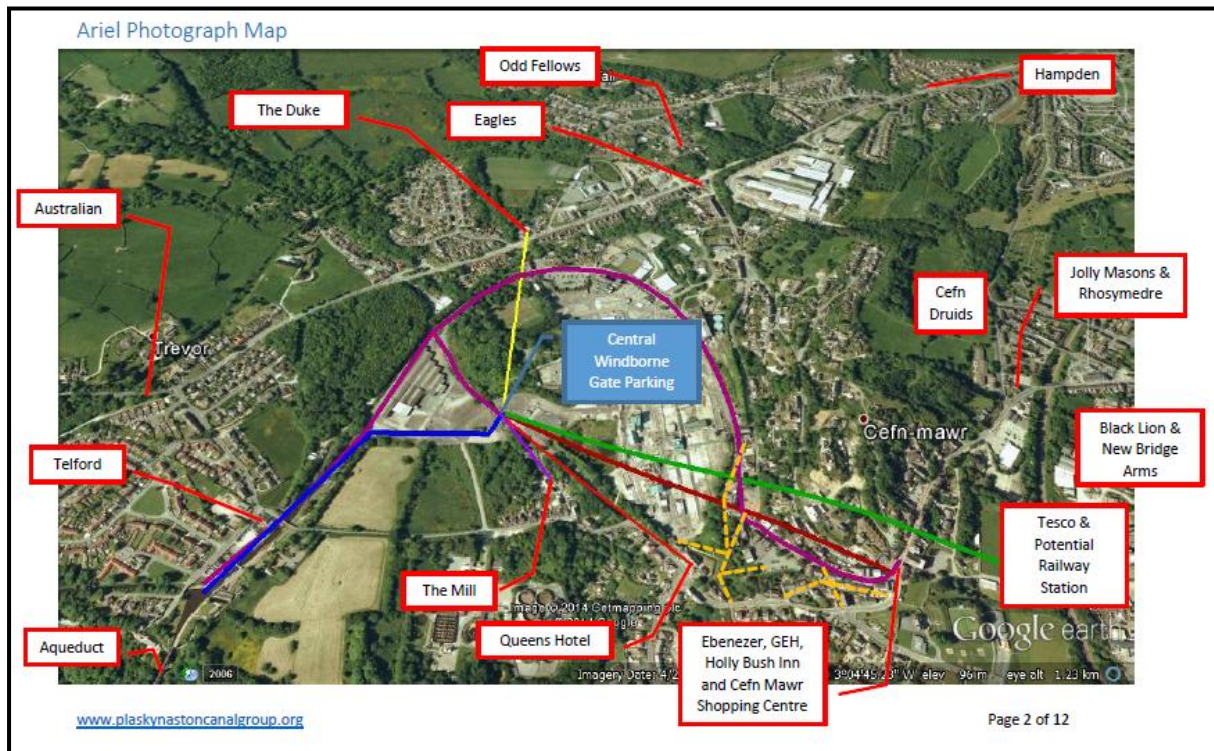
The most significant infrastructure improvement is the recently funded project to redouble the single track section from Saltney Junction to Wrexham. Consequent aspirations for new stations at Rossett and Johnstown may follow when this project is complete.

Improving accessibility to rail stations by public transport, walking and cycling.

**Comment:** Although reference to Johnstown is made in the LDP2, we see the Cefn & Cefn Mawr as a much better choice for all the reasons stated so far and backed up by our proposal for such under the LDP if a choice has to be made, however if stations could be built at both sites so much the better.

## PKC Group Proposals:

- The Windborne Gate Parking Area
- Jessop's Tramway (Jessop's Tramway is shown in
- Cefn Railway Station
- Plas Kynaston Canal & Marina



The Windborne Gate Parking Area central to our community and the aqueduct, please see our document, Windborne Gate Parking. In that document you will find the WALKING distances for all the facilities marked on the above aerial photograph. The Windborne Gate Parking area would then be linked into the Aqueduct and Cefn Mawr by another low carbon transport system for those that

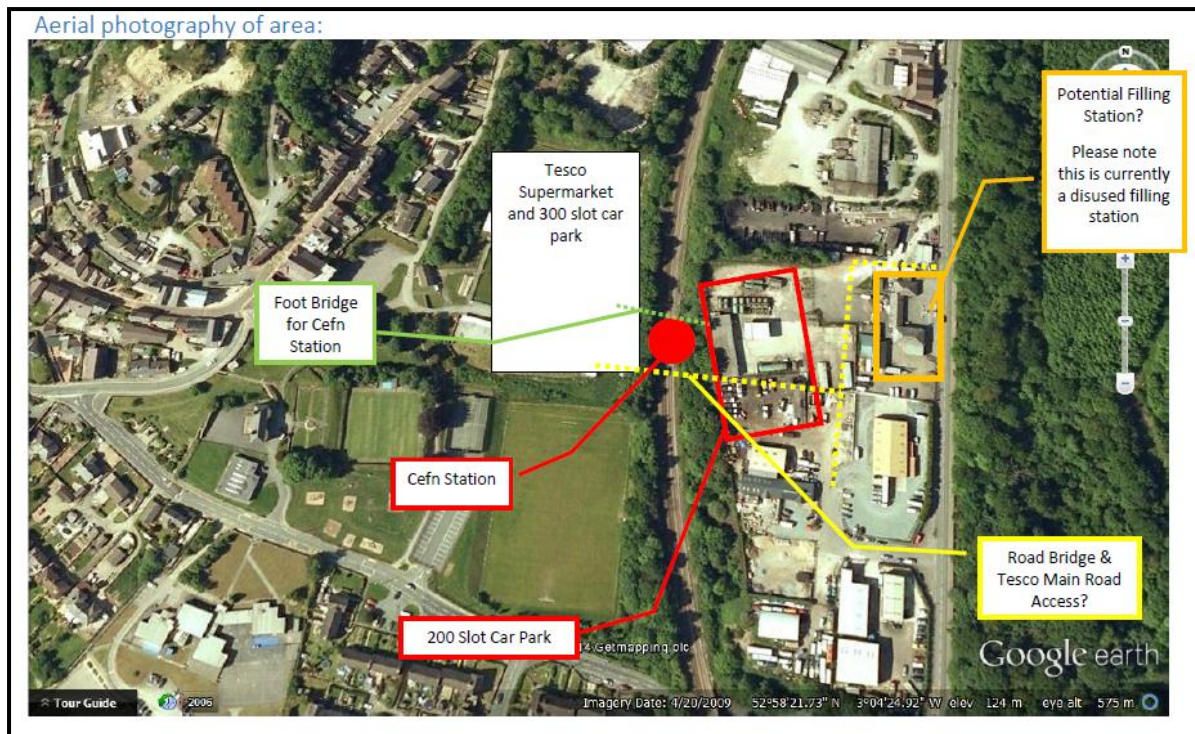
prefer to ride rather than walk.



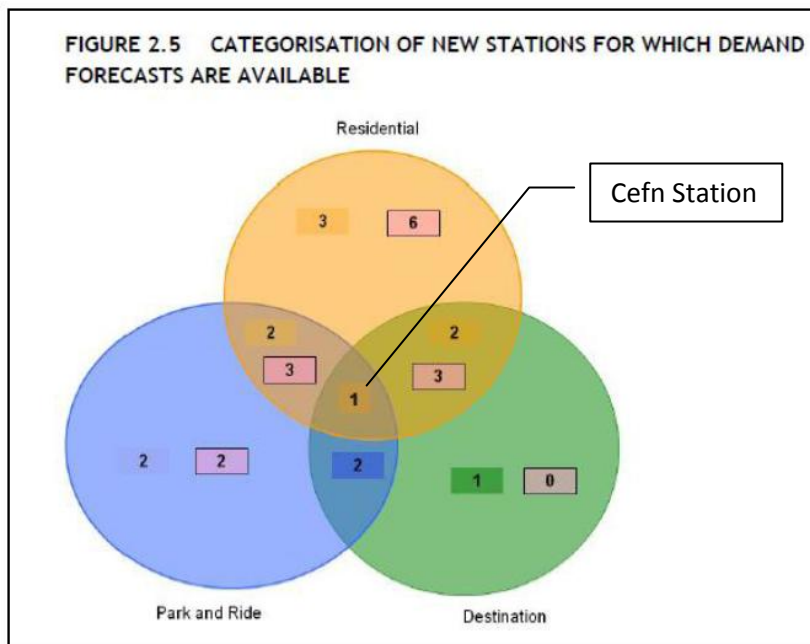
A horse drawn hackney service running between the three locations along a restored section of Jessop's tramway which is exactly the right gradient for such. This would then not only provide a low carbon transport system, it would also be very appealing to the

tourist and would be sustainable in real terms, providing further employment opportunities.





Cefn Railway Station situated between the Tesco Supermarket and Rhosymedre Industrial Estate, if a new station can be installed for South Wrexham, this is the place to put it. Please see our supporting proposal for such. This like all our other ideas has received wide spread support from our community.



Cefn Station scores very highly on this type of chart for new stations because it would serve (1) a large residential population, (2) it would provide a large park and ride facility for the Dee Valley travelling to Wrexham, Chester, Shrewsbury or further afield, (3) a reliable transport mode for Dee Side and other areas of high employment, (4) it would serve as a destination stop on three counts (5) as a commercial & retail centre,

(6) place of employment being immediately next to Rhosymedre Industrial Estate, (7) the primary and central stop for the Pontcysyllte WHS, Historical Village of Cefn Mawr & the Cefn, and Clwydian AONB.

The PKC group doubt that there any better locations to build a station in the UK than here in Cefn Mawr and wonder if any could score so high on an appraisal for such.





Remediating the ex Monsanto site and the reinstatement of the Plas Kynaston Canal terminating in a 60 berth marina at the Queens Hotel in Cefn Mawr. This then brings in another transport system not mentioned in the LDP2 that would add to the general economy of the Cefn in a positive way. This again would lead to further employment opportunities becoming available on a sustainable basis. After all, the canal system of the inland waterway has been working for the last 200 years.

Further to this if WCBC will work with us and adopt our proposals for the Cefn & Cefn Mawr into the LDP2:

- The Windborne Gate Parking
- Jessop's Tramway
- Cefn Station
- The Plas Kynaston Canal & Marina

And if the Wrexham County Borough Council have got their figures right about the tourist visitor head count for the Pontcysyllte World Heritage Site as of 2014 then the PKC Group will put a business case together for a Cable Car System linking the Windborne Gate Parking Area to the Crane in Cefn Mawr and install it.



## List of Abbreviations

PKC	Plas Kynaston Canal
WCBC	Wrexham County Borough Council
WAG	Welsh Assembly Government
WHS	World Heritage Site
UNESCO	United Nations Educational, Scientific and Cultural Organization
WPP	Welsh Planning Policy
LDP	Local Development Plan
ITV	Independent Television
PPW	Planning Policy for Wales
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SAC	Special Area of Conservation
UKCIP	United Kingdom Climate Change Impact Program
TPO	Tree Preservation Order
HMC	Habitat Modification Class
EAW	
RBMP	River Basin Management Program
WFD	Water Framework Directive
NRW	Natural Resources Wales
ppc	Per Capita Consumption
SuDS	Sustainable Drainage Systems
PFRA	Preliminary Flood Risk Assessment
RHS	River Habitat Survey
H <sub>2</sub> S	Hydrogen Sulfide (Gas)
NO <sub>x</sub>	Nitrogen Oxide (Gas also referred to as NO & NO <sub>2</sub> )
CO <sub>2</sub>	Carbon Dioxide
ppm	parts per million
AQM	Air Quality Management
AONB	Area of Outstanding Natural Beauty
CCW	Countryside Council for Wales
SLA	Special Landscape Area
CRT	Canal & River Trust
DMP	Destination Management Plan
SMR	Sites & Monuments Record
DCLG	
UNCRC	United Nations Convention on the Rights of the Child
TAN	Technical Advice Notice
MTAN	Minerals Technical Advice Notice
MPPW	Minerals Planning Policy Wales
BGS	British Geological Society
WSP	Wales Spatial Plan
AMP	Asset Management Plan
DVW	Dee Valley Water
BT	British Telecom
Mbps	Mega bytes per second
kV	Kilo Volts
EU	European Union