

PLAS KYNASTONCANAL GROUP

# PKC Group Paper for WCBC Portal Submission on Preferred Strategy

---

LDP2 Consultation Document

**David Metcalfe**

**3/17/2016**

## Contents

Introduction.....	2
Chapter 2: Context and Key Issues and Drivers .....	3
Chapter 3: Spatial Vision and Objectives .....	4
Chapter 4: Strategic Growth Options.....	5
Chapter 5: Spatial Options .....	6
Chapter 6: Strategic Policies.....	7
Policy SP 1 .....	9
Policy SP 2.....	10
Policy SP 4.....	11
Policy SP 5.....	13
Policy SP 6.....	15
Policy SP 7.....	16
Policy SP 8.....	17
Policy SP 9.....	19
Policy SP 10.....	20
Welsh Language.....	21
Policy SP 11 .....	21
Area of Outstanding Natural Beauty (AONB).....	22
Pontcysyllte Aqueduct and Canal and World Heritage Site .....	23
Tourism.....	24
Preferred Strategy Consultations .....	25

## Introduction

The PKC Group submitted the following comments in response to the Preferred Strategy Consultation by WCBC following a week end Public Consultation held in the Holly Bush Inn, Cefn Mawr on the 5<sup>th</sup> and 6<sup>th</sup> of March 2016.

This was held to ensure that most of the people of Cefn Mawr still supported and agreed with the proposals of the PKC Group for Cefn Mawr and to try and explain the proposed LDP2 as being written for the community of Cefn Mawr by WCBC. The Council was invited to participate in the consultation but since they had not planned one for the largest community outside Wrexham Town, they declined the offer.

Note text in italics is taken from the WCBC Preferred Strategy as it pertains to Cefn Mawr.

## Chapter 2: Context and Key Issues and Drivers

Cefn Mawr and surrounding villages at the centre of the WHS is the largest community outside Wrexham town and should be developed accordingly. It can become a prime asset for the county as a rural / urban transport hub for South Wrexham, the Dee Valley and the Pontcysyllte World Heritage Site. This can be accomplished by adopting the proposals we are making for Cefn Mawr for incorporation into the LDP2. These can be found on:

<http://plaskynastoncanalgroup.org/ldp2/>

The Key Drivers from the PKC Group for Cefn Mawr are:

- Correct Main Road Signage for Cefn Mawr, i.e. B&W Tourist Signposting
- Opening up of Windborne Gate for Central Parking for both Cefn Mawr & the aqueduct
- Reopening middle road as a part of Jessop's Tramway to connect the Cefn Mawr Village Centre with the aqueduct and the Windborne Gate Central Parking
- A new railway station at Cefn Mawr next to Tesco
- Reinstatement of the full length of the Plas Kynaston Canal all the way to the Queens Hotel in Cefn Mawr terminating in a 60 berth (or more) marina.
- Appropriate redevelopment of the ex-Monsanto and Air Products Brownfield sites.

These are sustainable development proposals that will improve the quality and diversity of our economy, which will alleviate unemployment in our community, currently one of the highest in Wrexham.

Furthermore by establishing Cefn Mawr as a rural / urban transport hub this will encourage more people to use public transport services rather than private cars and so will help with the reduction of CO2 production helping to mitigate climate change in a real sense.

The PKC Group full supports both the SDC and Future Generations Act, and these must be applied in the full context under the LDP2, and not glumly referred to while something else happens.

Establishing a railway station next to Tesco in Cefn Mawr as proposed by the PKC Group will provide significant relief for the over congested A483.

Our community of Cefn covering the whole area has Plas Madoc in the top 10% for Multiple Deprivation and Cefn Mawr not far behind in the top 30% with the highest unemployment rate in Wrexham, according to the LDP2 Evidence documents, Appendix 4 Settlement Function & Development. Therefore there is very good reason to look at and adopt what we say to alleviate this situation.

Cefn Mawr & aqueduct, is divided by the ex-Monsanto site at the very centre of Pontcysyllte WHS and immediately adjacent to the Clwydian & Dee Valley AONB. This needs to be remediated in accordance with the SDC, Future Generation Act and international law, while protecting our environment for our children and grand children.

<http://plaskynastoncanalgroup.org/monsanto-cefn-mawr/>

## Chapter 3: Spatial Vision and Objectives

### Economic

**Objective SO4:** *Promote active travel and use of public transport by locating new development in the most sustainable locations, and seek to alleviate known highway infrastructure capacity constraints on the road network within the County Borough.*

**Comment:** Establishing Cefn Mawr as a rural / urban transport hub for South Wrexham, the Dee Valley and the Pontcysyllte World Heritage Site will meet SO4 Objectives. By setting up the Windborne Gate parking area as the main parking area for tourists visiting the Aqueduct AND Cefn Mawr this will provide a park and ride facility where people will be encouraged to park their cars and either walk or ride on environmentally friendly forms of transport, like the horse drawn hackney services that will be provided. Furthermore a railway station at Cefn Mawr next to Tesco will help draw tourists for further afield such as London once services are reinstated as will be the case, most likely within the next 5 years given the average annual percentage rise of rail users. By situating railway station next to Tesco at the centre of the largest community outside Wrexham Town this will become one of the busiest stations on the line simply because it is within walking distance of so many people. This will then alleviate traffic congestion on the A483.

### Social

**Objective SO5:** *Facilitate mixed diverse communities by delivering housing, including affordable homes to meet the needs of the County Borough;*

**Objective SO6:** *Promote and encourage a healthy, active and safe lifestyle;*

**Objective SO7:** *Conserve, enhance and promote the local culture, character and distinctiveness of Wrexham including the Welsh Language;*

**Objective SO8:** *Ensure all development is supported by the necessary provision of, or improvements to infrastructure, services and facilities in an effective and timely manner to make development sustainable and minimise its effect upon existing communities.*

**Comment:** All the PKC Group Proposals for the LDP2 will help meet objectives SO5, SO6, SO7 & SO8 and are fully supportive.

### Environmental

**Objective SO9:** *Protect, manage and enhance the natural and historic environment and landscapes;*

**Objective SO10:** *Reduce carbon emissions and maximise our resilience to and mitigate and adapt to the impact of climate change;*

**Comment:** our Proposals for Cefn Mawr to be included in the LDP2 meet SO9 and SO10 objectives squarely on and therefore should be adopted. The proposals are for:

- Correct Main Road Signage for Cefn Mawr, i.e. B&W Tourist Signposting
- Opening up of Windborne Gate for Central Parking for both Cefn Mawr & the aqueduct
- Reopening middle road as a part of Jessop's Tramway to connect the Cefn Mawr Village Centre with the aqueduct and the Windborne Gate Central Parking
- A new railway station at Cefn Mawr next to Tesco
- Reinstatement of the full length of the Plas Kynaston Canal all the way to the Queens Hotel in Cefn Mawr terminating in a 60 berth (or more) marina.
- Appropriate redevelopment of the ex-Monsanto and Air Products Brownfield sites.

## Chapter 4: Strategic Growth Options

### 4.1 Overview

*As well as considering local aspirations of demand for new homes and jobs, it needs to be ensured that the final requirement is one that can be delivered.*

### 4.2 Review of the Growth Options

*Guidance states that options must be realistic and sustainable.*

**Comment** All PKC Group Proposals are realistic and sustainable for our community and the county of Wrexham that will provide new job opportunities and suitable space for housing without consuming Greenfield sites. Our proposals are deliverable and economically viable and should be incorporated in the LDP2 for Cefn Mawr.

### **B: Accordance with the Wales Spatial Plan and Wellbeing Goals (soundness test 1 – does the Plan fit?);**

*Sustainable development is at the heart of the planning system and there is now also a duty on public bodies in Wales to carry out sustainable development as a result of the introduction of the Wellbeing of Future Generations (Wales) Act 2015.*

*Ensuring that the right level of growth is selected in the right locations will allow the economy to continue to prosper and assist in making Wrexham a more equal County by improving access to job opportunities which will help people out of poverty and improve their health and wellbeing prospects.*

**Comment** the PKC Group fully supports both SDC Sustainable Development Charter and the Wellbeing of Future Generations Act 2015 by the Welsh Assembly Government. Furthermore all the PKC Group Proposals for the LDP2 are designed to support our community in Cefn Mawr on a sustainable basis for generations to come in compliance with both the Charter and Act, simply because this is the best thing to do. And by assisting the economy of Cefn Mawr to recover this will improve the equality, general health and wellbeing in Wrexham County.

### **F: Deliverability and capacity factors (soundness test 3: will the Plan deliver?)**

*The Council must make sure that new infrastructure and community facilities are provided as part of new development, where they are necessary. At the same time, we must make sure that any extra costs placed on developers do not render schemes to become unviable. The ability to practically deliver the required number of jobs and homes included in the selected growth option is a relevant consideration in assessing growth levels as deliverability and viability is a key test of soundness that the Plan must meet. Closely linked to this is the capacity of the area to accommodate the additional levels of growth including the timely provision of necessary supporting infrastructure, particularly transport solutions and the capacity of the development industry to deliver growth. This level of growth put forward in option B will allow the most appropriate range of sites to come forward at Deposit Plan stage to ensure that the plan will deliver.*

**Comment** We sincerely hope that the council will deliver on **Deliverability & Capacity** and a step in the right direction for this would be the adoption of the PKC Group Proposals for Cefn Mawr in the LDP2. For instance a new Railway Station in Cefn Mawr by Tesco would also result in dramatic growth on the Rhosymedre Industrial Estate which it would also facilitate. This will serve local industry, encouraging growth and the planned increase in population, due to the significant number of housing units indicated for the area.

## Chapter 5: Spatial Options

### 5.2 Sustainable Development Patterns

*The key messages regarding sustainable settlement patterns include locating development to reduce the need to travel by car by maximising accessibility to employment opportunities, services and facilities by walking, cycling and public transport. Development should be directed to existing urban areas which are well served by public transport, and which benefit from concentrations of jobs, facilities and services.*

**Tier 2: Key Settlement** – Settlements which support communities, but which are dependent upon the Primary Key Settlement for some key amenities. Some services are present and they have good access to public transport.

**Comment:** The reduction on the need to travel by car needs to be implemented for Acrefair/Cefn Mawr which is at the top of the tree and next to Wrexham Town due to the size of the combined community. This is why Cefn Mawr should become the Rural/Urban Transport Hub for South Wrexham, the Dee Valley and the Pontcysyllte WHS. Once again a railway station at Cefn Mawr will do this and will serve the largest community outside Wrexham Town in the county and will go hand in hand with promoting economic growth on the Rhosymedre Industrial Estate and establishing Cefn Mawr as an end destination in its own right within the WHS, which will have significant positive benefits for the county as a whole.

### 5.6 The Councils Preferred Spatial Strategy

*The proximity and accessibility of Wrexham Industrial Estate (WIE) to Wrexham Town provides sustainable opportunities for people to live and work in the same area, reducing the need to travel and commute out of the Borough to access employment opportunities elsewhere.*

**Comment:** Reducing the need to travel or commute out of the Borough is a very strong reason for a Railway Station at Cefn Mawr between Tesco and the Rhosymdre Industrial Estate. This will form the main basis for establishing Cefn Mawr as the transport hub for South Wrexham, Dee Valley and Pontcysyllte WHS. This will also cause a significant increase in commercial activity and viability on what is presently an almost derelict and disused industrial area. By situating the railway station as said this will attract inward investment from companies because of the improved transport facilities available. Furthermore there is a large work force immediately available within walking distance and over a period of time such as the LDP2 to 2028 we can expect a complete turnaround of the Rhosymedre Industrial Estate to one of high productivity with the latest and leading edge companies seeking to move in. This is a win win situation for Cefn Mawr and the county of Wrexham.

Please note table shown in Appendix 4 of the “Settlement Hierarchy and Development Potential” document, page 29 shows the conclusions that the WCBC has formed about our community in Cefn Mawr & Acrefair. The tables refers to an employment area which can only be the Rhosymedre Industrial Estate and is shown in green. 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 commercial business investment which will increase employment levels in the area. A railway station between Tesco and the industrial estate will provide the stimulus for this to occur.

## Chapter 6: Strategic Policies

### 6.1 Overview

Chapter 4 and 5 have provided an outline of the Councils Preferred Growth and Spatial Strategy for the Local Development Plan over the period 2013 – 2028. The key components of the LDP Preferred Strategy therefore comprise the:

- Provision for 11,715 new homes to deliver a requirement of 10,650;
- Provides opportunities to deliver 7500 new jobs in the County;
- Delivers in the region of 53ha of employment land; and
- Concentrates development in the following sustainable locations in accordance with the findings of the settlement hierarchy and SA:
  - The Key Settlements of Acrefair / Cefn Mawr, Chirk, Coedopeth, Gresford / Marford, Gwersyllt and Rhosllanerchrugog;

**Comment:** We have seen reference to 950 housing units indicated for the Western Villages which obviously includes Acrefair/Cefn Mawr and we are wondering of the 950 how many are allocated to our area? We also stress that correct provision should be made for population increases in available infrastructure as well as alleviating the economic deprivation. Our community is already suffering from the highest unemployment levels in the county and it is ironic in this LDP that the worst housing areas quoted, are creations of past local authorities. We do not want to see a repeat performance at Cefn Mawr as things are bad enough already.

### 6.2 Delivering Sustainable Development

*The principle aim of the Councils Preferred Strategy is to contribute to sustainable development. In land use planning terms Sustainable Development principles are set out in chapter 4 of Planning Policy Wales (Edition 8, January 2016). The strategy does not replicate the national policy position but it is expected that all new development, by complying with policies in the development plan, will contribute towards the achievement of sustainable development.*

**Comment:** The PKC Group fully supports the SDC and hopes that it will be implemented for all and not forgotten when it doesn't suit large property developers etc. Sustainable Development is about developing the local community which has been forgotten all too often over the past years with the result of decimating our communities with large multi nationals that act as vacuum cleaners for any available cash in the community. Wrexham Town Centre as most town centres are is prime example of this type activity. We hope Cefn Mawr is not going to be blighted with a ring of supermarkets as has been hinted at, or is WCBC really missing what SDC is all about?

### Economic Growth Employment and Enterprise

*The location of the County Borough means it is well placed to tap into the economic opportunities in both Wales and North West England. It also benefits from good connections to much of the UK through road and rail links and internationally, being within 45 mins drive from major airports in both Manchester and Liverpool and 90 minutes from Birmingham.*

*One of the principal objectives of the LDP is to 'Support a vibrant, diverse and competitive local economy that provides a range of job opportunities to enable new and existing businesses to grow in Wrexham'. It is essential therefore that the County Borough has an adequate employment land supply to accommodate the projected growth while allowing choice and flexibility to meet the varying nature of future employment needs and demands.*

## PKC Group Paper for WCBC Portal Submission on Preferred Strategy

Submitted 17<sup>th</sup> March 2016

*This is emphasised in the Council's Economic Prosperity Strategy (2012-2017) which recognises the need for Council intervention to guide the development of the local economy and confirms the Council's commitment to securing enough of the right land or buildings to attract high quality employment opportunities in the most sustainable and accessible locations.*

**Comment:** Economic Growth Employment & Enterprise is good reasons for a Railway Station at Cefn Mawr and establishing Cefn Mawr as a Rural/Urban Transport Hub for South Wrexham, Dee Valley and the Pontcysyllte WHS. Furthermore once the Wrexham London services are resumed we are only a couple of hours from London, the biggest tourist market in the UK.



## Policy SP 1

### Economic Growth, Employment and Enterprise

- *Providing a level of growth which allows opportunities to deliver approximately 7500 jobs in the County Borough over the Plan period across a wide range of employment sectors;*
- *Ensuring there is sufficient land for high tech, high value and quality business development, which is accessible to public transport, the primary road network and employment markets;*
- *Provide local employment opportunities in key service centres;*
- *Targeting growth sectors and ensuring the availability of a range of sites;*
- *Supporting and encouraging the creation of a sustainable and diverse rural economy;*
- *Maintain and enhance the County Borough's tourism, culture and leisure offer taking into account of the unique character, local distinctiveness and heritage of the area and its context in the wider sub region;*

*One of the principal objectives of the LDP is to 'Support a vibrant, diverse and competitive local economy that provides a range of job opportunities to enable new and existing businesses to grow in Wrexham'. It is essential therefore that the County Borough has an adequate employment land supply to accommodate the projected growth while allowing choice and flexibility to meet the varying nature of future employment needs and demands.*

*This is emphasised in the Council's Economic Prosperity Strategy (2012-2017) which recognises the need for Council intervention to guide the development of the local economy and confirms the Council's commitment to securing enough of the right land or buildings to attract high quality employment opportunities in the most sustainable and accessible locations.*

*The Preferred Strategy sets out an employment land requirement of some 53ha and an increase of some 7550 jobs over the plan period which is broadly compatible with the ELR findings.*

*As traditional employment uses tend to generate lower land values than some other uses, e.g. housing or retail, there can be pressure for employment land to be lost to these uses, which can be difficult to replace. While some existing sites which may not have a reasonable prospect of being used for economic development can be de-allocated, the Deposit Plan will contain a policy to safeguard existing and identified future employment sites for employment use, including land at Wrexham Gateway and Wrexham Technology Park for high quality (B1) employment development.*

*In principle the re-use of buildings in rural areas, small scale rural tourism and business development, subject to specific criteria/ limitations.*

**Comment:** The PKC Group Proposals for inclusion in the LDP2 will certainly help towards SP1 goals of delivering this for Cefn Mawr and the County of Wrexham. Once again the proposals are for:

- Correct Main Road Signage for Cefn Mawr, i.e. B&W Tourist Signposting
- Opening up of Windborne Gate for Central Parking for both Cefn Mawr & the aqueduct
- Reopening middle road as a part of Jessop's Tramway to connect the Cefn Mawr Village Centre with the aqueduct and the Windborne Gate Central Parking
- A new railway station at Cefn Mawr next to Tesco
- Reinstatement of the full length of the Plas Kynaston Canal all the way to the Queens Hotel in Cefn Mawr terminating in a 60 berth (or more) marina.
- Appropriate redevelopment of the ex-Monsanto and Air Products Brownfield sites.

And can be down loaded from: <http://plaskynastoncanalgroup.org/ldp2/>

## Policy SP 2

### Infrastructure Priorities and Developer Contributions

- *Highway network and public transport improvements;*
- *Public Open Space and Green Infrastructure;*
- *Community facilities;*
- *Affordable Housing;*
- *Surface Water management; and*
- *Ecological mitigation.*

**Comment:** PKC Group proposals for Cefn Mawr for inclusion in the LDP2 will help and support SP2 objectives with public transport improvements, Green and Open Space, Community Facilities, Affordable Housing, Surface Water Management and Ecological Mitigation.

And can be down loaded from: <http://plaskynastoncanalgroup.org/ldp2/>

## Policy SP 4

### Transport and Accessibility

*In accordance with the priorities of the Joint Local Transport Plan, new development and associated transport infrastructure should:*

- *Enhance transport network resilience and take steps to adapt our transport networks to the effects of climate change;*
- *Integrate with strategic public transport services;*
- *Improve access to jobs and employment, homes, services, healthcare and facilities by locating new development in close proximity to existing infrastructure by walking, cycling and public transport;*
- *Provide adequate levels of car and cycle parking where required taking into consideration the location and accessibility of the site to existing public transport facilities and the type, mix and use of development proposed.*

*Opportunities to improve public transport including cycle, bus and rail facilities will be taken wherever possible through improved services and connections, interchange facilities and parking at railway stations.*

*The level of housing and economic growth within the Plan will have significant impacts on the transport network that will require considered management and mitigation. The Preferred Strategy is mindful that growth will lead to an inevitable increase in trips but seeks mitigation by locating development, especially where it is likely to generate significant levels of movement, in locations supporting the transport hierarchy.*

*The spatial strategy directs the majority of new development to Wrexham Town in accordance with the transport hierarchy; then to tiers 2-3 where the need to travel is reduced due to local provision of services accessible by walking/cycling and where good sustainable travel options (bus and rail) are available to Wrexham Town.*

*The Joint Local Transport Plan (JLTP, 2015) identifies the A483 trunk road as being of local, regional and national importance. At its intersections with the County Road network, particularly at junctions 3, 4, 5 and 6 (to the western side of Wrexham Town) there are significant existing capacity constraints. Inevitably growth, regardless of its location within the County Borough, is likely to exacerbate this issue unless a suitable solution, including significant funding from Welsh Government can be found over the lifetime of the Development Plan. This constraint poses a barrier to the delivery of the Key Strategic mixed use housing.*

LDP Objectives	SO1, SO2, SO3, SO4, SO5, SO6, SO8, SO9, SO10 & SO12
Evidence base	<ul style="list-style-type: none"> <li>• Topic Paper: Transport (February 2016)</li> <li>• Joint Wrexham and Flintshire Affordable Housing and Community Infrastructure Levy Viability Assessment (November 2014)</li> <li>• Joint Local Transport Plan (2015)</li> <li>• Draft Sustainable Urban Mobility Plan (2015)</li> <li>• Active Travel (Wales) Act 2013</li> <li>• Draft Wrexham Strategic Road Capacity and Improvement Study (February 2016)</li> <li>• Wrexham Town Centre Accessibility Study (Ryder Landscape Consulting, 2015);</li> <li>• Wrexham Transport Accessibility Study (Crowd Dynamics, December 2009)</li> <li>• Future of Rail in Wrexham (January 2015)</li> </ul>
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	<ul style="list-style-type: none"> <li>• Sustainable transport for unallocated development</li> <li>• Traffic management policy for the identified primary road network, trunk roads and core network.</li> <li>• Potential policy for the protection of disused railway lines for future transport/recreation use.</li> <li>• Further identification of priority network improvement;</li> <li>• SPG: Transport to cover parking, set out any requirements for Transport Assessments in locally sensitive areas for developments that fall outside of the thresholds contained in PPW.</li> </ul>

**Comment:** Once again the PKC Group Proposals meet the requirements of Transport and Accessibility of SP4 for Cefn Mawr the largest community in the county of Wrexham outside Wrexham Town, as well as the surrounding villages of the Cefn at the centre of the Pontcysyllte WHS.

Once again the proposals are for:

- Correct Main Road Signage for Cefn Mawr, i.e. B&W Tourist Signposting
- Opening up of Windborne Gate for Central Parking for both Cefn Mawr & the aqueduct
- Reopening middle road as a part of Jessop's Tramway to connect the Cefn Mawr Village Centre with the aqueduct and the Windborne Gate Central Parking
- A new railway station at Cefn Mawr next to Tesco
- Reinstatement of the full length of the Plas Kynaston Canal all the way to the Queens Hotel in Cefn Mawr terminating in a 60 berth (or more) marina.
- Appropriate redevelopment of the ex-Monsanto and Air Products Brownfield sites.

And can be down loaded from: <http://plaskynastoncanalgroup.org/ldp2/>

## 6.4 A Resilient Wrexham

*The County Borough's natural environment is of outstanding quality and beauty. The diversity of both statutory and non-statutory landscape, habitats, species and geological features, and their relationship with the urban area, contribute enormously to the County Borough's distinctive and attractive character. Much of the landscape of the County Borough is of outstanding visual amenity value, including the recently extended Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) which forms part of the wider landscape setting surrounding the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS).*

*As well as making the County a special place to live and visit, the natural environment contributes significantly to the quality of life and economy of the area. As one of the County's most valuable assets, all reasonable steps should be taken to ensure that development conserves and enhances the quality of natural heritage, whilst balancing the need to facilitate sustainable economic growth and provide sufficient housing. This approach allows for appropriate development in line with the principles of sustainability, which seek to balance environmental, economic and social needs.*

*As well as the preservation and enhancement of the natural environment, the Plan should seek to reduce the causes and adapt to the consequences of climate change. Chapter 5 outlines the sustainable settlement pattern which reflects the approach advocated in Planning Policy Wales. This approach seeks to minimise the causes of climate change. As well as reflecting sustainable development principles within the spatial strategy, national guidance identifies the need to undertake an assessment of the opportunities and potential for renewable energy in the area.*

## Policy SP 5

### Protecting, Conserving and Enhancing the Natural Environment

- *The Clwydian Range and Dee Valley Area of Outstanding Natural Beauty recognising the importance it has in contributing to the Outstanding Universal Value and setting of the Pontcysyllte Aqueduct and Canal World Heritage Site;*
- *Special Landscape Areas recognised for their outstanding local landscape character;*
- *natural landscape features such as trees, hedges and forests and the green networks between them which contribute to the quality and diversity of the natural environment and play an important role in mitigating the impact of climate change; and*
- *The quality of natural resources including water, air and soils*

*The natural environment is one of Wrexham County Borough's greatest resources. However, increasing populations, the need to supply additional housing, provide employment sites, changing rural practices and economies, and climate change are all placing significant pressure on the County's natural environment. The policy approach recognises the potential conflict in accommodating growth and protecting natural assets and seeks to balance this conflict by identifying and protecting the designations and assets which are of most significance to the County Borough.*

*Protection, conservation and enhancement of the natural environment will allow for appropriate development in line with the principles of sustainability - to balance environmental, economic and social needs. Appropriate development will need to conserve and enhance valued countryside, landscapes, wildlife and significant geological sites, minimise harmful impacts on biodiversity and landscape character and identify and provide, where possible, mitigation and compensation for environmental losses.*

*The policy identifies those international, national and local designations which are identified as making an important contribution to the environmental quality of the County Borough. Development should seek to conserve and enhance those areas of designation. It is recognised that the Plan should have regard to the relative significance of international, national and local designations in considering the weight to be attached to nature conservation interests and should take care to avoid placing unnecessary constraints on development. Beyond this, the Deposit Plan will seek to support the development of an integrated network of high quality multi-functional Green Infrastructure both within the County Borough and wider sub region recognising the importance of such facilities to biodiversity, wellbeing, amenity, sustainability and climate change.*

*The Deposit Plan will also seek to promote accessibility to the countryside and green open space, developing and maintaining Green Infrastructure links with communities and urban areas; as well as recognising the importance of open space, sport and recreational areas to biodiversity, wellbeing and amenity. The Plan will also protect and enhance existing areas of open space as well as set out standards for the provision of new areas and facilities.*

DP Objectives	SO6, SO7, SO9, SO10
Evidence Base	<ul style="list-style-type: none"> <li>• Natural Environment Topic Paper;</li> <li>• Strategic Green Wedge Review: Phase 1 (February 2016)</li> <li>• Special Landscape Area Review (ongoing);</li> <li>• Habitat Regulations Assessment (February 2016) ;</li> <li>• Sustainability Appraisal (February 2016)</li> <li>• That potential issues associated with disposal of wastewater are recognised and addressed during the development of the LDP'</li> </ul>
Topic / criteria based policies in the deposit Plan	<ul style="list-style-type: none"> <li>• Criteria based natural environmental policies</li> <li>• Special Landscape Areas;</li> <li>• Strategic ecological network on Wrexham Industrial Estate;</li> <li>• Green Infrastructure</li> <li>• Managing Surface Water</li> </ul>

**Comment:** All PKC Group Proposals for Cefn Mawr for incorporation into the LDP meet the requirements for Protecting, Conserving and Enhancing the Natural Environment in accordance with SP5 and can be downloaded from <http://plaskynastoncanalgroup.org/ldp2/>

## Green Wedge

LDP Objectives	SO7, SO9
Evidence Base	<ul style="list-style-type: none"><li>• Natural Environment Topic Paper;</li><li>• Strategic Green Wedge Review (Stage 1, February 2015);</li><li>• Strategic Green Wedge Review (Stage 2) – to be completed for Deposit Plan;</li></ul>
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	<ul style="list-style-type: none"><li>• Green Wedge defined on LDP proposals map;</li><li>• Topic Based Green Wedge Policy</li></ul>

**Comment:** The green wedge seems more like the thin end of the wedge with the way the LDP is currently being applied by WCBC.

## Policy SP 6

### Promoting Health and Wellbeing

- Ensuring that all new developments provide opportunities for healthy living and improve health and well-being through the encouragement of walking and cycling, high quality design, access to services, open space, green infrastructure, sports facilities and opportunities for recreation;
- Supporting the improvement of education and skills training, access to job opportunities and encouraging lifelong learning to help reduce poverty;

*Access to greenspace, and opportunities for recreational exercise, have been shown to help improve mental health and wellbeing.*

**Comment:** PKC Group fully supports SP6 and the Proposals for the LDP2 will help with new development around Cefn Mawr by providing opportunity for healthier living and well being. The proposals for the infrastructure and open park land will encourage walking and cycling in preference to driving to the local public service infrastructure and for enjoying the open green spaces.

PKC Group Proposals can be downloaded from: <http://plaskynastoncanalgroup.org/ldp2/>

### Open Space, Sport and Recreation

*Open space is important for people's health and social and economic wellbeing, as well as contributing to the environmental quality of the County Borough. All playing fields and areas used for recreational play such as children's equipped play grounds and multi-use games areas are significant for recreational, social and amenity value.*

*The provision of public open space in association with new developments is important to ensure that the appropriate amount and type of open space is provided in the right place to enable recreational needs to be met locally. The Deposit Plan will identify, protect and enhance areas of open space used for sports and recreation. New developments which require open space provision will be expected to create new open spaces on-site in accordance with the Council's open space standards set out in the Open Space Audit and Assessment of Need once completed.*

**Comment:** PKC Group fully supports Open Space, Sport and Recreation and their proposals for the LDP2 will help with new development around Cefn Mawr. The full reinstatement of the Plas Kynaston Canal is an ideal example of such. The proposals for the infrastructure and open park land will encourage walking and cycling in preference to driving for enjoying open green spaces by providing a park and walk, cycle or ride facilities at the very heart of the WHS and Dee Valley AONB.

PKC Group Proposals can be downloaded from: <http://plaskynastoncanalgroup.org/ldp2/>

### Allotments and Food Growing

*Allotments contribute towards sustainable communities, healthy living, biodiversity and help foster improved interaction between different social groups, as recognised by Planning Policy Wales and TAN 16: Sport, Recreation and Open Space (2009). The Council, alongside private groups, provide allotment gardens in the County Borough for use by the local population. There is increasing interest in allotment gardening both nationally and locally, it is important therefore that existing provision is protected for continued use as allotments, and that the terms of Section 23 of the 1908 Allotments Act as amended, which require Local Authorities to provide allotments where there is identified demand, are met.*

**Comment:** Sounds Great

## Policy SP 7

### Housing Provision

Provision is made for 11,715 new homes in order to deliver a requirement of 10,650 over the period 2013 – 2028.

Key to sustaining the economic prosperity of the County Borough is ensuring that a continued supply of new homes is provided to meet the needs of an increasing population. The Plan deviates above the 2011 based Welsh Government household projections and makes provision for 11,715 new homes in order to deliver a housing requirement of 10,650 units with a 10% flexibility allowance over the Plan period.

There remains however a shortfall that needs to be provided for the remainder of the Plan period, a proportion of which will result in the need for Greenfield sites on the edge of existing settlements to be allocated. The majority of the remaining allocations (approximately 6,740 new homes) are directed to Wrexham Town, the most sustainable settlement within the County Borough through the allocation of Brownfield sites within settlements and via Key Strategic Greenfield Sites for mixed use housing and community facilities. Further non-strategic sites will be identified through the Deposit Plan and an identification of the approximate level of potential allocations within each tier is identified in the reason justification for policy SP8: Location of New Development.

The Council must make sure that new infrastructure and community facilities are provided as part of new development were necessary. At the same time, it must make sure that any extra cost placed on developers does not render schemes to become unviable and ultimately, not delivered on the ground.

Densities within existing settlement limits vary between 30 – 50 dwellings per hectare on average, with higher density development within Wrexham Town and Wrexham Town Centre. Higher density developments can assist in urban and rural regeneration by increasing possible population numbers to support communities, social facilities and public transport, as well as reducing Greenfield land take.

LDP Integrated Objectives	SO1, SO2, SO3, SO5 & SO9
Evidence Base	<ul style="list-style-type: none"> <li>Wrexham Local Housing Strategy - Local New Housing Landscape (2013-2018)</li> <li>Older Persons Accommodation Needs Assessment (2013)</li> <li>Local Housing Market Assessment (March 2015);</li> <li>Joint Wrexham and Flintshire Affordable Housing and Community Infrastructure Levy Viability Assessment (November 2014);</li> <li>Candidate Site Register (February 2016)</li> </ul>
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	<ul style="list-style-type: none"> <li>Non-strategic housing allocations in tiers 1, 2, 3, and 4;</li> <li>Windfall development including small scale infill proposals;</li> <li>Former Flexsys / Monsanto Site, regeneration policy;</li> <li>Housing in the Countryside (infill, barn conversions, replacement dwellings and rural enterprise dwellings – TAN6);</li> <li>Affordable Housing Rural Exceptions;</li> <li>SPG: Affordable Housing</li> <li>SPG: Development in the open countryside</li> </ul>

**Comment:** The PKC group would like to see more information pertaining to Cefn Mawr as this is currently pretty vague. However the group fully supports the reference to infrastructure and transport requirements were once again the PKC Group proposals for inclusion in the LDP will provide a lot of the answers for Cefn Mawr and surrounding villages in South Wrexham.



## Policy SP 8

### Location of New Development

Over the Plan period, development within the County Borough is directed to the following locations in order of priority in accordance with the sustainable Settlement Hierarchy:

- Within the Key Settlements (Tier 2 ) of Acrefair / Cefn Mawr, Chirk, Coedpoeth, Gresford / Marford, Gwersyllt and Rhosllanerchrugog

<b>Tier 2 - Key Settlements</b>	<ul style="list-style-type: none"> <li>• Acrefair / Cefn Mawr</li> <li>• Chirk</li> <li>• Coedpoeth</li> <li>• Gresford / Marford</li> <li>• Gwersyllt</li> <li>• Rhosllanerchrugog</li> </ul>	930	<p><u>Housing:</u></p> <ul style="list-style-type: none"> <li>• Brownfield allocations;</li> <li>• Greenfield allocations; and</li> <li>• Windfall sites;</li> </ul> <p><u>Employment:</u></p> <p>Protection of existing employment areas where appropriate;</p>	<p><u>Housing:</u></p> <ul style="list-style-type: none"> <li>• Settlement limits may change in the Deposit Plan to include allocations (sites that can deliver 10 or more units) for new housing development in some of these areas;</li> <li>• Small site less than 10 to contribute to overall housing requirement via windfall development – policy relating to windfall development required in deposit plan;</li> <li>• Regeneration policy required in relation to the former Flexsys / Monsanto site in Cefn Mawr;</li> </ul> <p><u>Employment:</u></p> <p>Policy protecting existing employment areas where appropriate with such areas defined on the proposals map.</p>
---------------------------------	--	-----	--	--

LDP Objectives	SO1, SO2, SO3, SO4, SO4, SO5, SO6, SO7, SO8, SO9, SO12
Evidence Base	<ul style="list-style-type: none"> <li>• Background Paper 2: Settlement Hierarchy and Development Potential (February 2016);</li> <li>• Candidate Site Register (February 2016);</li> <li>• Background Paper 3: Key Strategic Sites (February 2016);</li> <li>• Background Paper 5: Site Assessment Methodology (February 2016);</li> <li>• Initial Sustainability Appraisal Report, Preferred Strategy (2015)</li> </ul>
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	<ul style="list-style-type: none"> <li>• Non-strategic housing allocations in tiers 1, 2, 3, and 4;</li> <li>• Windfall development including small scale infill proposals;</li> <li>• Former Flexsys / Monsanto Site, regeneration policy;</li> <li>• Housing in the Countryside (infill, barn conversions, replacement dwellings and rural enterprise dwellings – TAN6);</li> <li>• Affordable Housing Rural Exceptions;</li> <li>• SPG: Affordable Housing;</li> <li>• SPG: Development in the open countryside;</li> <li>• Protection of any new or existing employment areas;</li> <li>• Key Strategic Site: Employment</li> </ul>

**Comment:** Not a lot of information is given here other than 930 housing units for the western villages. Reference is made to the former Flexsys / Monsanto Site Regeneration Policy which has yet to be sighted.

## Policy SP 9

### Key Strategic Sites and Area of Search

The majority of new growth in the County Borough will be delivered within the Primary Key Settlement of Wrexham Town and Wrexham Industrial Estate by the respective development of the following two Key Strategic Sites (KSS) and Area of Search as indicated on the Key Diagram:

Mixed Use Housing and Community Facilities: KSS1: Lower Berse Farm, Ruthin Road, Wrexham to accommodate the delivery of:

- approximately 1260 new homes including an element of affordable housing;

Mixed Use Housing and Community Facilities: KSS2: Land to the east of Cefn Road including land to the south of Holt Road and Bryn Estyn Lane, Wrexham to accommodate the delivery of:

- approximately 1500 new homes including an element of affordable housing;

Background Paper 3, Key Strategic Sites provides further information about the KSS and the preferred area of Search. It is expected that prior to the submission of any Planning application on these sites that developers and other interested parties work with the Council and local community to bring forward a comprehensive master plan incorporating all the elements outlined in the above policy. A map of each KSS proposal is shown in Appendix 5.

### No Comment

## 6.8 A Wrexham of Vibrant Culture and Thriving Welsh Language

This section of the strategy relates to the historic environment including elements which contribute to our sense of place and identity. It also sets out sustainable design principles which will apply to all new development in the County Borough and is closely linked to the theme of 'a Wrexham of Cohesive Communities'.

### Conserving, Protecting and Enhancing the Historic Environment

The historic environment is central to the appearance, culture and character of Wrexham County Borough. It contributes to our sense of place and cultural identity; it enhances our quality of life, adds to local distinctiveness and is an important economic and social asset. It is vital that the historic environment is appreciated, protected, actively maintained and made accessible for the general wellbeing of present and future generations.

Wrexham has a rich, varied and high quality historic environment which is evidenced in the wealth of listed buildings, conservation areas, scheduled ancient monuments, historic parks, gardens and landscapes and the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS). The historic environment has key role to play in fulfilling the objectives of the LDP whether they form part of the key commercial and retail core with Wrexham Town Centre, contribute towards a growing tourist economy or add to the cultural and historical identity of the County Borough. The Council is keen to ensure that historic assets are protected from inappropriate development and the opportunity is taken, where possible, to enhance historic areas, buildings and landscapes.

**Comment:** PKC Group supports.

## Policy SP 10

### Conserving, Protecting and Enhancing the Historic Environment

- Conservation Areas;
- The Outstanding Universal Value of the Pontcysyllte Aqueduct and Canal World Heritage Site

*Depending on the circumstances, the Council may agree to the minimal level of enabling development in order to secure the building's future and any such proposals should be in line with the English Heritage document 'Enabling Development and the Conservation of Significant Places' (2008).*

*The historic environment can add value to regeneration proposals and attract businesses to the Borough, acting as a stimulus for local economic growth including tourism. The Borough's heritage also strengthens local distinctiveness and sense of place for residents and visitors.*

*The Townscape Heritage Initiative (THI) project in Cefn Mawr has been instrumental in attracting business and investment via heritage led regeneration and there are similar other areas of the County Borough where a similar approach would help achieve the vision and objectives of the LDP such as in Wrexham Town Centre and Brymbo. Policies in the Deposit Plan will outline the approach to be taken.*

LDP Objectives	SO2, SO3, SO7, SO9
Evidence Base	<ul style="list-style-type: none"> <li>• Topic paper: Historic Environment;</li> <li>• Topic Paper : Natural Environment;</li> <li>• The Clwyd 'Register of Landscapes, Parks and Gardens of Special Interest in Wales' (1995).</li> <li>• Pontcysyllte Aqueduct and Canal World Heritage Site Management Plan</li> <li>• Enabling Development and the Conservation of Significant Places' (Historic England, 2008)</li> </ul>
Topic / criteria based policies required in the deposit Plan including SPG's	<ul style="list-style-type: none"> <li>• World Heritage Site - Protection of the Outstanding Universal Value, authenticity and integrity and siting of tourist facilities as well as supporting infrastructure;</li> <li>• Buildings at Risk – reduction, management, bring back into use and enabling development;</li> <li>• Development within Conservation Areas;</li> <li>• Alterations to unlisted buildings within Conservation Areas;</li> <li>• Alterations to shop-fronts in Conservation Areas;</li> <li>• Heritage Assets and Regeneration – Focused areas of Wrexham Town Centre, Cefn Mawr &amp; Brymbo;</li> <li>• Archaeological remains</li> <li>• Conservation Area Character Assessments &amp; Management Plans</li> <li>• Cefn Mawr and District: Understanding Urban Character</li> </ul>

**Comment:** The reference to the THI in Cefn Mawr is true for investment in the fabric of buildings however the economic commercial base of Cefn Mawr as a going community is extremely precarious, especially since the arrival of Tesco and a large movement of customers from the traditional shopping centre of Cefn Mawr to the new Tesco Supermarket. The truth of the current situation is that the economy of Cefn Mawr is in decline despite the work of the THI. Cefn Mawr needs to be reunited to the aqueduct to bring tourism into Cefn Mawr in meaningful numbers or eventually all the shops restored under the THI scheme will close and all the conservation work will be lost. Cefn Mawr could become the first Ghost Town Conservation Area in the not too distant future.

The PKC Group Proposals for the LDP2 directly look at this and how to do it on a working basis: <http://plaskynastoncanalgroup.org/ldp2/>

## Welsh Language

*The future wellbeing of the Welsh language and its contribution to Welsh cultural heritage is dependent on a variety of key factors such as education, demographic change and community activities and economic prosperity.*

**Comment:** The PKC Group supports the Welsh Language

## Policy SP 11

### Sustainable Design Principles

*Proposals which can demonstrate high quality, sustainable design will be supported; all new development should:*

- *Respect local character and amenity and achieve a sense of place through the appropriate mix, layout, design and orientation of new buildings including the public realm;*
- *Ensure connectivity of places and ease of movement and legibility, with priority for pedestrians and cyclists;*
- *Promote safe, inclusive and secure environments and access routes;*
- *Make the best use of high quality, sustainable materials;*
- *Mitigate and adapt to the predicted effects of climate change;*
- *Provide for the sustainable management of water and waste;*
- *Promote multifunctional and adaptable public spaces including provision for public art where appropriate;*
- *Incorporate and increase green infrastructure and opportunities for biodiversity in the design and layout of new buildings and spaces;*
- *Be sympathetic to heritage, environmental and landscape assets; and*
- *Incorporate on site energy efficiency measures and provide for renewable energy generation either on site or through carbon offsetting measures;*

LDP Objectives	SO3, SO4, SO5, SO6, SO7, SO8, SO9, SO10
Evidence Base	<ul style="list-style-type: none"> <li>• Topic Paper: Transport (February 2016)</li> <li>• Topic Paper: Historic Environment (February 2016)</li> <li>• Topic Paper: Natural Environment (February 2016)</li> <li>• Topic Paper: Health and Wellbeing</li> <li>• Topic Paper: Wrexham Town Centre and Retail</li> <li>• Wrexham Town Centre Public Realm Study (AECOM;2015);</li> </ul>
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	SPG: Design

**Comment:** All PKC Proposals for Cefn Mawr for inclusion in the LDP2 are fully compliant with Sustainable Design Principles which they are in fact drawn up on. The PKC Group is a signatory to the SDC and this lies at the forefront of PKC Group Planning. Our proposals respect the local character of Cefn Mawr for layout, design and public realm. The proposals ensure connectivity that enables movement of people on foot or by bicycle and to use public transport. The proposals are sympathetic to heritage, environmental landscapes and assets providing opportunity for biodiversity alongside the community.

The PKC Group supports the SDC <http://plaskynastoncanalgroup.org/pkc/sdc/>

## Area of Outstanding Natural Beauty (AONB)

*The Clwydian Range and Dee Valley AONB includes parts of the Counties of Denbighshire, Flintshire and Wrexham. Within the County Borough the AONB covers Ruabon Mountain in the east, and the area surrounding the Pontcysyllte Aqueduct and Canal World Heritage Site and Chirk Castle*

LDP Objectives	SO7, SO9,
Evidence Base	<ul style="list-style-type: none"> <li>• Topic Paper: Natural Environment (February 2016)</li> <li>• The Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) draft Management Plan for the AONB (2014 - 2019).</li> </ul>
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	<ul style="list-style-type: none"> <li>• Topic based policy which outlines the approach to the determination of applications for development affecting the AONB.</li> </ul>

**Comment:** The PKC Group supports the AONB and points out that the community of Cefn Mawr and the ex Monsanto and Air Products sites are immediately adjacent to the AONB. These sites should be remediated and developed accordingly.

## Pontcysyllte Aqueduct and Canal and World Heritage Site

*Pontcysyllte Aqueduct and Canal World Heritage Site was inscribed onto the UNESCO World Heritage List on 27 June 2009. The site stretches for 11 miles; from Gledrid in Shropshire, through Wrexham where the canal is carried above the River Dee and spans the Vale of Llangollen by the Pontcysyllte Aqueduct, and continuing westwards into Denbighshire where the site terminates at the Horseshoe Falls.*

*The site contains a number of outstanding and internationally important features. The aqueduct and the eleven miles of canal centred upon it utilised a concentrated series of innovative engineering solutions to negotiate a challenging upland landscape and for two centuries it remained as the tallest navigable aqueduct in the world. The site is a spectacular example of canal engineering, an architectural masterpiece set in a dramatic landscape, exemplifying improvements in transport during the industrial revolution. It is of outstanding universal value (OUV). The aqueduct and canal, its immediate setting and key views to and from the site and its wider historic and social context (e.g. the immediate locality provided materials and engineering expertise) that underpin the justification for building the aqueduct and canal are critical to the interpretation of the site and in understanding the integrity and authenticity of the outstanding universal value.*

*There is a need to provide essential facilities to meet the needs of visitors to the site. Since the site lies largely within open countryside it is not always possible for these facilities to be located within developed areas and it is therefore recognised that limited development (such as car parking, toilets) in the open countryside will be necessary. Essential facilities must be sensitively located, landscaped and designed so as not to conflict with the reasons for designating the site. Bilingual signage and interpretation is also expected.*

*The aqueduct and canal and its immediate environs extend into Denbighshire and Shropshire and as such the WHS Management Plan makes recommendations on the production and formulation of joint policy and Supplementary Planning Guidance to ensure a consistent approach across the 11 mile site. The existing joint Supplementary Planning Guidance (Local Planning **Guidance Note 33 – Pontcysyllte Aqueduct and Canal World Heritage Site**) has been prepared to reflect this requirement and is likely to be carried forward in its current form for the Deposit Plan.*

LDP Objectives	SO2, SO7 & SO9
Evidence Base	<ul style="list-style-type: none"> <li>• Historic Environment Topic Paper (February 2016)</li> <li>• Natural Environment Topic Paper (February 2016) ;</li> <li>• Pontcysyllte Aqueduct and Canal World Heritage Site Management Plan</li> </ul>
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	Policies in the Deposit LDP will need to be consistent with those of neighbouring Authorities (Denbighshire and Shropshire) and seek to protect OUV, authenticity and integrity of the site as well as to ensure tourist facilities and infrastructure are appropriately sited.

**Comment:** The PKC group supports the preservation of the aqueduct and WHS however we have serious reservations about the DMP, Destination Management Planning for the central section at Cefn Mawr and the Aqueduct simply because both mater plans produced by two independent firms of consultants for WCBC and CRT have not included the community of Cefn Mawr in the plans. These plans are:

- Pontcysyllte Aqueduct & Canal Visitor Centre and Master Plan Concept by ARUP prepared for WCBC and what was then British Waterways dated January 2012.
- Trevor Basin Hub Pontcysyllte, Aqueduct and Canal World Heritage Site Development Plan prepared for WCBC & CRT by Pleydell Smithyman dated December 2014.

Neither of these documents includes the local community in the planning strategy.

## Tourism

Sustainable tourism development has been identified by Welsh Government, Wrexham County Borough Council and its partners as being vital to economic prosperity. In 2014 the visitor economy was worth over £100m to the local economy, with 1.74m visitors supporting 1620 full time jobs with the general trend for the visitor economy showing signs of steady growth. Tourism can contribute to the social, economic and environmental objectives for the LDP and can help deliver the strategy for Economic growth, employment and enterprise (SP1), Wrexham Town and Wrexham Town Centre (SP3) and Promoting Health and Wellbeing (SP6).

A key role for the LDP will be to facilitate tourism land use actions and priorities from the Economic Prosperity Strategy 2012-2016, Destination Management Plan, WCBC (2012-2017), WCBC (2015). **Key priorities will be enhanced visitor facilities and infrastructure at the World Heritage Site.**

There are other tourism opportunities that may arise from the AONB, heritage assets, rural development and recreational development that may arise from disused land, parks, former railway lines, canals and rivers and cycle/walking routes.

The strategic policies for Transport and Accessibility (SP4), Protecting, Enhancing and Preserving the Natural Environment (SP5) and Historic Environment (SP12) will all help contribute to the promotion of tourism.

LDP Objectives	SO1, SO2,SO3, SO4,SO6, SO7, SO9
Evidence Base	<ul style="list-style-type: none"> <li>• Topic Papers: Employment, Historic Environment, Wrexham Town Centre and Retail (all February 2015);</li> <li>• Economic Prosperity Strategy 2012-2016;</li> <li>• Destination Management Plan 2012-2017</li> <li>• Draft Wrexham Town Centre Masterplan 2015;</li> </ul>
Topic / criteria based policies in the deposit Plan including any potential supporting SPG's	<ul style="list-style-type: none"> <li>• Criteria based policy to support tourism opportunities in the deposit Plan including within rural areas;</li> <li>• Criteria based policy to preserve, protect or enhance tourism, sport and leisure facilities;</li> <li>• Wrexham Town centre regeneration policies</li> <li>• Visitor accommodation criteria policies</li> <li>• Re-use of buildings in rural areas</li> <li>• Farm diversification policy</li> </ul>

**Comment:** The PKC Group are concerned about the visitor facilities and infrastructure being planned for the WHS at the aqueduct and Trevor Basin. This is because this planning totally ignores the historic village of Cefn Mawr which is in serious economic recession while planning for more new shops, bars and hotels where the bulk of the tourists currently go simply because of the present parking situation. If the main parking is centralised at the Windborne Gate as proposed for this LDP2 by the PKC Group people could also visit Cefn Mawr as well as the aqueduct and use the facilities in the village rather than build new in direct competition, to the struggling economy of Cefn Mawr. The present DMP is not destination management planning, it is disaster management planning and will create serious social inequalities in the area over the period of the LDP.



## Preferred Strategy Consultations

Venue	Address	Date	Time
<b>Rossett &amp; Burton Village Hall</b>	Station Avenue, Rossett, Wrexham, LL12 0EH	Tuesday 16 <sup>th</sup> February 2016	09.00am – 1.00pm
<b>Guildhall, Meeting Room 1</b>	Rhosddu Road, Wrexham, LL11 1AY	Thursday 18 <sup>th</sup> February 2016	09.00am – 1.00pm
<b>Glyn Wylfa Centre</b>	Castle Road, Chirk, Wrexham, LL14	Wednesday 24 <sup>th</sup> February 2016	3.00pm - 7.00pm
<b>Gwersyllt Resource Centre, Activity Room</b>	Second Avenue, Gwersyllt, Wrexham, LL11 4ED	Wednesday 2 <sup>nd</sup> March 2016	09.00am – 1.00pm
<b>Wrexham Council Ruthin Road Offices</b>	Ruthin Road, Wrexham	Tuesday 8 <sup>th</sup> March 2016	3.00pm - 7.00pm
<b>Pentre Gwyn Community Centre</b>	Abenbury Road, Wrexham, LL13 0NT	Friday 18 <sup>th</sup> March 2016	09.00am – 1.00pm
<b>Overton Village Hall</b>	Penyllan Street, Overton, Wrexham, LL13 0EE	Thursday 24 <sup>th</sup> March 2016	3.00pm - 7.00pm

**Comment:** Please note that although Acrefair /Cefn Mawr is top of the tier 2 of Key Settlements for the “Location of New Development” and is the largest community in the county of Wrexham outside Wrexham Town, no consultation was planned for our community.