

PRE-APPLICATION CONSULTATION REPORT

Campus 2025

On behalf of Glyndwr University

August 2018

1 Introduction, Context and Purpose

- 1.1 This report is produced on behalf of Glyndwr University and accompanies seven major Planning / Listed Building / Conservation area applications, which are submitted on behalf of Glyndwr University to Wrexham County Borough Council. Collectively, these planning applications are referred to as “Campus 2025” and are a significant package of disposal of surplus assets and reinvestment in new academic and student accommodation facilities across Wrexham.
- 1.2 In accordance with the Town and Country Planning (Development Management Procedure Order) (Wales) Order 2012, a 28-day pre-application consultation exercise was undertaken on Campus 2025 between 18th June and 17th July 2018.
- 1.3 Whilst Campus 2025 comprises seven discreet Planning / Listed Building / Conservation Area applications, the public consultation exercise was undertaken on all applications at the same time, reflecting the linkages between the overall package of planning applications, as the sale of surplus land for development enables the redevelopment of new academic and student accommodation facilities at Glyndwr University. The seven separate applications are listed below:

Site	Proposal	Ref
Glyndwr University Plas Coch Campus	Detailed planning and Listed Building Application for Demolition of student union and other redundant buildings, and redevelopment of academic campus to provide new Learning Gateway and Inner Gateway Buildings, new Engineering Building, new Sports Hall Extension, redevelopment of multi-use games area, refurbishment of social learning and academic tuition space, together with new car parking, infrastructure, landscaping and public realm works.	Application One
Regent Street Arts College	Detailed Planning and Listed Building Application for refurbishment and improvement of Arts College, demolition of ancillary buildings and construction of new 107-bed student accommodation facility	Application Two
	Demolition required within conservation area of ancillary outbuildings within Arts School to enable construction of 107 bed student accommodation facility.	Application Three
Land at north west of Plas Coch Campus	Outline Planning Application Demolition of redundant student halls and construction of up to 410 apartments with access from B5101, together with car parking, site landscaping and associated infrastructure on surplus land within the overall Plas Coch academic Campus.	Application Four
Land west of Crispin Lane	Outline application for student accommodation facility of up to 197 bed spaces, with parking and landscaping.	Application Five
Dean/Holt Road	Outline planning application for the erection of up to 74 dwellings together with vehicular/pedestrian access from Holt Road, open space which can be used with adjoining land to the west to create a formal sports pitch, site landscaping, sustainable drainage and other related infrastructure	Application Six
Gatewen Road	Outline Planning application for the erection of up to 112 dwellings together with vehicular/pedestrian access from Gatewen Road, open space, site landscaping, sustainable drainage and other related infrastructure	Application Seven

2 Consultation Structure

- 2.1 Given the requirement to consult on all seven individual applications as outlined above, separate site notices were produced for each site. Copies of these notices are included at **Appendix One**.
- 2.2 All site notices were displayed in accordance with the statutory provisions at all sites from 18th June 2018 onwards.
- 2.3 Copies of site notices were also posted to all owners and occupiers of adjoining land. The properties which received a site notice are as follows:

Site	Proposal	Ref
Plas Coch Campus	<ul style="list-style-type: none"> All properties on Mold Road from the main roundabout with the B5101 to Maesgwyn Road All the retail park on the west of Plas Coch Wrexham FC (Racecourse Ground) 	Application One
Regent Street Arts College	<ul style="list-style-type: none"> All of Central Retail Park All properties with the "island" between Regent St, the A451 and A5252 All properties fronting Regent Street on the opposite side of the road between A5152 and Station approach All properties on Bradley Road which overlook the campus i.e. between Regent St and Central Road 	Application Two & Three
Land NW of Plas Coch Campus	<ul style="list-style-type: none"> The tennis centre to the north All Central Retail Park All of Ashfield Road Any houses on Crispin Lane from Wrexham Village north up to the junction with the B5101 	Application Four
Land west of Crispin Lane	<ul style="list-style-type: none"> Wrexham FC Wrexham General Railway Station The turf public house Nightingale Hospice Shop All of Wrexham Village (apologies -that is a big one – we need to do each flat) 	Application Five
Holt Road	<ul style="list-style-type: none"> All of Langford Close All of Goulbourne Avenue from Holt Road up to Blanter Way All of Monmouth Road from Crdigan Road, except the portion to the NE which does not contain properties which adjoin the site All of Denbeigh Close All of Oaklands Avenue All of Dean Road from Oaklands Avenue to the roundabout with Holt Road All properties on Holt Road up to St Andrews Crescent All of Ryder Close Carden Park Way from Fairmont Road northwards 	Application Six
Gatewen Road	<ul style="list-style-type: none"> Every cul-de-sac on the western edge of Whitehead Drive, up to the footpath All the houses on Gatewen Road from Hallview to Dale Road All properties on Moss Valley Road 	Application Seven

2.4 Copies of all notices were also forwarded to relevant Councillors, Community Councils and Specialist Consultees. These were all sent with an accompanying letter explaining the requirement for consultees to make representations.

2.5 A sample of one of these letters is included at **Appendix Two**. A list of the various consultees is below:

Holt Road	Gatewen Road	Wexham Village	Northern Gateway	Plas Coch Academic	Regent Street
Wrexham CBC (as planning authority)	Wrexham CBC (as planning authority)	Wrexham CBC (as planning authority)	Wrexham CBC (as planning authority)	Wrexham CBC (as planning authority)	Wrexham CBC (as planning authority)
Wrexham CBC (as highway authority)	Wrexham CBC (as highway authority)	Wrexham CBC (as highway authority)	Wrexham CBC (as highway authority)	Wrexham CBC (as highway authority)	Wrexham CBC (as highway authority)
Welsh Water	Welsh Water	Welsh Water	Welsh Water	Welsh Water	Welsh Water
Dee Valley Water	Dee Valley Water	Dee Valley Water	Dee Valley Water	Dee Valley Water	Dee Valley Water
Cllr Mike Davies (Rhosnesni Ward)	Cllr Alan Edwards (New Broughton Ward)	Cllr Mark Jones (Grosvenor Ward)	Cllr Mark Jones (Grosvenor Ward)	Cllr Mark Jones (Grosvenor Ward)	Cllr Alun Jenkins (Offa Ward)
Acton Community Council	New Broughton Community Council	Rhosddu Community Council	Rhosddu Community Council	Rhosddu Community Council	Offa Community Council
Sports Council for Wales				Theatres Trust	

3 Consultation Responses from Site Notices and Owners/Occupiers of Adjoining Land

3.1 Listed below are the various responses received for each of the sites. For each site, a table has been produced which details the issue, Glyndwr University's response to the comment raised and, where relevant, how the issue has been addressed with the proposals being taken forward.

Plas Coch Campus Academic (Application One)

3.2 The only response received was from Wrexham Civic Society. The society recognise Glyndwr's cultural and economic importance to the County Borough and welcomes the initiative to upgrade the facilities for the 21st Century.

Regent Street Arts College (Applications Two and Three)

3.3 The only response received was from Wrexham Civic Society. The society recognise Glyndwr's cultural and economic importance to the County Borough and welcomes the initiative to upgrade the facilities for the 21st Century. The following comments were raised:

Issue	Narrative	How Addressed
Recognise the need for improved access, so long as the frontage setting is restrained and uncluttered	Reviewed plans against this comment	Considered that current proposals deliver this ambition of being restrained and uncluttered.
Improvements to messy and shabby area behind the listed building are welcomed	A key requirement for Glyndwr University was to improve the rear courtyard of the site	Reviewed design and pleased that Civic Society support the proposals to improve the rear of the site.
Design of new buildings is commonplace	General comment on design	Reviewed design and considered that in responding to its surroundings, providing an effective solution for 107 new student bedspaces and with regard to the listed buildings, it is an acceptable proposal.

Land North West of Plas Coch Campus (Application Four)

3.4 No Responses were received from properties adjoining the site, or as a result of the site notices.

Land West of Crispin Lane

3.5 No Responses were received from properties adjoining the site, or as a result of the site notices.

Holt Road (Application Six)

3.6 For Holt Road, a pro-forma letter has been used by 174 of the 228 total respondents. This letter contains four common objections, which are listed A-D in the table below. Beyond these common objections across all the pro-forma letters, respondents were able to list any additional objections / comments upon the pro-forma letter, which are listed below. In addition, 54 respondents did not use the pro-forma letters and provided their own comments, which are also listed within the table below:

Issue	Narrative	How Addressed
Common Issue A Local requirement to play more than one game concurrently. General objection to loss of open space, leading to a potential rise in anti-social behaviour.	The land is currently private property and does not have any status as a formal pitch and the teams could be told they can no longer play football on the land at any time. Glyndwr University will be required to sell this surplus asset to invest in its main campus and continue to attract students.	The proposed gifting of land to Wrexham CBC or a community trust will secure its future use as a sports pitch.
Common Issue B Loss of green space for exercise and dog walking. Acton Community is already below recommended open space provision.	The land is private property of Glyndwr University. Land transfer to create a formal sport pitch is proposed. Open Space will therefore be enhanced within Acton Community, as the land can be safeguarded.	The proposed gifting of land to Wrexham CBC/community trust will secure its future use as a sports pitch.
Common Issue C Increase in traffic on Holt Road, increasing risk of accidents and congestion	Site is within urban area of Wrexham and within the most sustainable settlement within Wrexham CBC.	Transport Assessment demonstrates the site can be brought forward without any significant highway impacts.
Common Issue D Glyndwr University promoting an ethical moral and environmental message.	There is an acknowledged housing crisis within the UK. Need for decision makers to make a balanced decision, which places significant weight on housing need.	Planning Statement outlines the case for new housing to be provided via Para 4.2.4 of PPW.
Health Impact	Reduction in play space could lead to obesity	Land for a formal sports pitch is proposed
Schools, doctors, hospitals and other infrastructure	Concern regarding impact on existing services	Potential S106 mechanism to address any requirements
Principle	The land is surplus to requirements for Glyndwr University and helps to address the housing shortage within Wrexham	No change
Green space policy TAN16 and para 3.7 of PPW	As per planning statement, the subject site is not a public asset	No change. Requirement to balance housing need
Overlooking	Proposed site layout complies with standards regarding separation distances	No change
Lack of greenspace within Wrexham vs number of teams.	The land is currently used by Borrass Park Albion, although no formal lease is in place.	The proposed gifting of land to Wrexham CBC or a community trust will secure its future use as a sports pitch.

Gatewen Road (Application Seven)

3.7 Two individual responses were received from properties which adjoin the site. The issues raised are listed below as follows:

Issue	Narrative	How Addressed
Housing is very much needed	Acknowledges the need	Acknowledged housing need which the application responds to.

Issue	Narrative	How Addressed
Habitats and wildlife – requests some green corridors	This has been considered via the ecological surveys and advice from Glyndwr’s ecological consultants.	Ecologists recommendations are incorporated within the masterplan.
Noise Pollution	Site is not within an area where noise pollution is a significant issue.	Site replicates adjoining residential development and therefore does not place development within a noisy area.
Traffic Congestion	Site has significant credentials in sustainable transport.	Transport Assessment demonstrates the site can be brought forward without any significant highway impacts.
GP Surgery Capacity	Local healthcare infrastructure is the responsibility of the NHS. Any significant improvements could be secured via a planning obligation.	NHS has a responsibility to ensure capacity exists, which includes meeting the needs of a growing pollution – the same requirement which results in the housing need.
Education Capacity	Local education infrastructure is the responsibility of the Local Authority. Any significant improvements could be secured via a planning obligation.	Local Education Authority has a responsibility to ensure capacity exists, which includes meeting the needs of a growing pollution – the same requirement which results in the housing need.

4 Responses received from Specialist Consultees, Councillors and Community Councils

Councillors and Community Councils

4.1 Responses were received from three Local Councillors. Cllr Marc Jones (Grosvenor Ward Member) sits on the planning committee and therefore declined from making any public comments.

4.2 Cllr Mike Davies (Rhosnesni Ward Member) submitted a detailed objection on the proposals for Holt Road. The issues raised are as follows:

Issue	Narrative	How Addressed
Variations between 77 units and 70 units discussed at presentation.	An earlier presentation hosted by Glyndwr had suggested the scheme would be 70 units.	Reflects the evolution of the design and work-in-progress.
Site was previously described with a presentation as brownfield.	Site is not brownfield	No change required.
Conflict with strategic aims of development plan	Suggestion that development plan seeks to focus growth in deprived areas within settlement limits	Site is within settlement limits and development plan is now significantly out of date, therefore attaches less weight in decision making process
Site is a playing field	Suggests that because site is a playing field, within an area identified as having a deficit of open space, then its loss would be contrary to advice in PPW.	Site has no status as a playing field and will be disposed of by Glyndwr University. Proposed land transfer will result in a sports pitch which is owned by Wrexham CBC or community trust
Wrexham CBC Open Space Audit identifies the land as "Amenity Open Space"	The land has no status as a sports pitch and Glyndwr are not obliged to provide public access or facilitate sports on the land.	No change required
Use of pitches	Suggests more than one pitch is marked on the land	There is no formal agreement in place to provide any pitches on the land.
Access from Holt Road	Queries the feasibility of existing pedestrian crossing and distances to other accesses	Crossing will not be affected and transport assessment details junction separations distances to acceptable.
Ethical and environmental position of Glyndwr University	Suggests that the land should not be sold	Land provides land for a formal sports pitch and addresses the significant environmental, economic and social need for additional housing in Wrexham.

4.3 Cllr Phil Wynn (Brynyffynnon Ward Member) submitted a detailed series of comments in relation to Plas Coch and Regent Street as follows:

Issue	Narrative	How Addressed
Car Parking Survey for Plas Coch requested in October, when campus is busier	Requests additional survey and details of phasing arrangements to ensure parking provision is provided early in the development trajectory	Does not require any amendments to the transport assessment, but further details may be provided in due course, following consultation with Highway Authority.
Vehicle Access on Mold Road	Requests further information on various scenarios,	Outside the scope of the subject applications.

Issue	Narrative	How Addressed
	including when Racecourse Ground is being used	
Double Yellow Lines on Crispin Lane	Suggest a scheme is investigated to remove parked cars from Crispin Lane	Transport Assessment does not find an issue, plus this is outside of the scope of the subject applications.
Regent Street Parking	Concerns raised about occupants of student accommodation parking on near-by residential streets, plus relationship between service vehicle lay-by and junction.	Highway engineers reviewed this issue and will provide further information within transport assessment.

Community Councils

4.4 Acton Community Council held a special meeting to consider the pre-application consultation and responded by letter of 11 July 2018. The letter confirms the Community Council's strong opposition to the proposals, on the basis of:

- Site is not brownfield
- Deficit of open space within the local area
- Loss of amenity and negative effects on health and wellbeing
- Contrary to National Guidelines and the Well-Being of Future Generations (Wales) Act 2015
- Highways – Holt Road currently at capacity
- Surface water and flooding concerns
- Local infrastructure such as education, healthcare, GP Surgeries shopping and other amenities

Much of these concerns e.g. Highway capacity and surface water drainage are addressed within the technical assessments which accompany the application. The concerns regarding amenity and open space (on private land) will need to be balanced by Wrexham CBC as Planning Authority against the need to provide new housing and the need to enable improvements to Glyndwr University to take place, which requires the sale of surplus assets to generate revenue.

All responses from Wrexham CBC Councillors and Community Councils are contained within **Appendix Three**.

Specialist Consultees

As per the table outlined at Paragraph 2.5 of the report, individual consultees were notified by letter. The following responses were received.

Welsh Water

4.5 Welsh Water provided comments on all the proposed planning applications which comprise Campus 2025. Copies of all these responses are contained within **Appendix Three**. For

Applications One to Three and Five, then Welsh Water have confirmed that domestic foul flows from the proposed development can be accommodated within the existing public sewage system and that there are no issues with the capacity of the relevant sewage treatment facilities. For Application Four (410 apartments NW of Plas Coch Campus) Welsh Water have requested further dialogue and information via the planning process.

- 4.6 For surface water, then Welsh Water have highlighted the need to use the approach outlined in Part H of the Building Regulations 2000, which is a hierarchical approach, preferring infiltration and disposal to watercourses in liaison with the Land Drainage Authority.
- 4.7 For Application Six (Holt Road) then Welsh Water have also confirmed that there is sufficient capacity within the network to accommodate the additional foul flows and that a new connection be made to the existing network in Holt Road. Welsh Water also confirmed that there are no issues with the capacities of the relevant sewage treatment facilities.
- 4.5 Welsh Water did however raise an issue in relation to asset protection. Glyndwr University's consultant team are aware of the presence of a 1300mm foul sewer which runs within the site close to the eastern boundary. This asset requires a 6.5m easement at either side. The initial strategy was to divert this sewer, via Section 185 of the Water Industry Act 1981. Having looked further at this issue, Glyndwr University have now decided (primarily due to cost and for ease of delivery of a housing development) to amend the site layout, so that this sewer remains in place, with a new road running on top of the pipeline.
- 4.6 For Application Six (Holt Road) then Welsh Water have also confirmed that there is sufficient capacity within the network to accommodate the additional foul flows and that a new connection be made to the existing network in Holt Road. Welsh Water also confirmed that there are no issues with the capacities of the relevant sewage treatment facilities.
- 4.7 For Application Seven (Gatewen Road) then Welsh Water highlighted the presence of an existing 80mm rising main sewer. This has already been factored into the site layout. In terms of the proposed scheme within the red-line of the application site, then there is no need to amend any aspects. Welsh Water have however commented on the initial proposal to discharge foul flows into the combined sewer in Coronation Road and consider that there is insufficient capacity within this sewer to accommodate new flows without causing detriment to the services provided to existing customers, or to the protection of the environment.
- 4.8 The two potential routes forward are outlined by Welsh Water as follows:
- a) Foul flows be taken to manhole SJ31510102, which is further from the site but a dedicated foul sewer, rather than the combined system closer to the site.
 - b) Commission Welsh Water to undertake a Hydraulic Modelling Assessment, to establish whether a closer point of connection can be facilitated.

On the basis of the above, the outline planning application does not need to be amended, although it is acknowledged that this issue will need to be resolved via the consideration of any planning application. Glyndwr University are now commissioning a Hydraulic Modelling Assessment via Welsh Water, which will provide the necessary background data to resolve this issue.

Highway Authority

4.9 Wrexham County Borough Council as Highway Authority made comments on the four transport reports. Note, Applications One, Four and Five are covered by one overall transport assessment, which looks at the cumulative impact across the Plas Coch Campus. The comments on the individual sites are as follows:

Issue	Narrative	How Addressed
Trip generation impact of demolished student accommodation	Need to clarify that the proposed demolition of the existing on-campus student accommodation has been considered to be off-set by the proposed extension to the Wrexham Village on-site student accommodation.	Clarification regarding this issue to be provided within amended transport report.
Rerouting of university traffic to Crispin Lane and Mold Road	Need to clarify the impact on Crispin Lane and Mold Road. The nature of the junctions proposed as priority junctions will mean that university traffic exiting onto a congested network will, in effect, be held within the university campus.	The impact of moving the routes for vehicles accessing the campus has been fully accounted for within our assessment and we have demonstrated that the impact is negligible
Access off Mold Road (splitter island)	Suggested improvement to proposed junction.	Amend the junction plans to show an extended splitter island instead of hatching as is currently shown. A detailed scheme can be conditioned to follow.
Crispin Lane / Stansty Road junction	Further traffic surveys have been conducted that capture this junction, so the impact is fully assessed.	Suggest Glyndwr seek clarification regarding why it is considered this junction is being questioned in layout or design terms - there appears to be good visibility and it looks to be appropriate for its setting
Stansty Road / New Road junction	Further traffic surveys have been conducted that capture this junction, so it is fully assessed.	No change required.
Crispin Lane / Mold Road junction	Legacy issue from previous planning application (approved) for student accommodation, which requires third party land.	Seek further discussion with Wrexham CBC Highways to fully understand the issues and potential solutions for this junction.
A483 / A541 Junction 5	Highlighted as a potential issue.	Further traffic surveys have been conducted that capture this junction, so Glyndwr will be fully assessing the impact on the wider network.
Assessment of 15 years growth	Modelling issue.	Revised future year modelling to account for 15 years growth to be provided.

Number of bedrooms	Seeking clarification for number of bedroom at NW of Plas Coch.	Need to clarify that the outline application needs to make an assumption, as the final bedroom split is unknown.
TRICS data	Modelling issue. Suggested that ITP respond providing further justification as to	Further narrative to be provided on why the trip rates are appropriate based on the type of accommodation, accessibility and location. Nearly 3 vehicular movements per day for each apartment is still in excess of many towns and cities within the UK.
Discrepancy in car parking survey results	Issue of dates of surveys and corresponding student numbers at Glyndwr University in previous years.	Further clarification to be provided within transport assessments.
Car parking survey period	Issue regarding data.	Further clarification to be provided within transport assessments.
Campus Car parking capacity	Request for additional onsite car parking.	Requires further discussion with Wrexham CBC Highways to determine acceptable way forward.
PRS car parking capacity	Query regarding whether 390 spaces for 410 apartments is sufficient.	Further response required. Car ownership in the local area is only 88 cars per 100 dwellings.
Construction Traffic Management Plan	Suggested to manage construction process.	To be discussed either by provision at outline stage or via planning conditions.

Theatres Trust

- 4.10 The National Advisory Body for Theatres were consulted, due to the fact that Application One includes the William Aston Hall. Having undertaken a review of the proposals, the Theatres Trust conclude that the William Aston Hall is unaffected by the proposed development and is likely to benefit by virtue of the wider improvements to the University site. The Theatres Trust therefore support the proposals. A copy of this letter is also contained within Appendix Three.

Sports Council for Wales

- 4.11 Sport Wales have objected to the proposals for Holt Road. Within the response, it is stated that:

“The proposal’s supporting information states that the land earmarked for development is not a formal sports pitch and should not be assessed as such. Sport Wales understands that the area is capable of forming a sports pitch and has been used as such in the past. Sport Wales therefore requests adequate evidence, ideally in the form of a playing pitch strategy, that the area concerned is not needed to meet the sporting needs of the local area. The lack of use as a sport pitch does not indicate a lack of need.”

Even if the site is not needed for formal sport, consideration should be given for its retention for other open space uses. The Welsh Government's Technical Advice Note (TAN) 16 Sport, Recreation and Open Space states "When not required for their original purpose, they may be used to help meet the need for informal recreational or amenity land in the wider community. Only where it can be clearly shown that there is no deficiency, should the possibility of their use for alternative development be considered".

- 4.12 Glyndwr University have sought to engage further with Sport Wales, as the situation facing Glyndwr is that Campus 2025 needs to take place to secure the longer-term future of the whole University. Therefore, the surplus land at Holt Road will be sold and the university are obliged to sell for best value. Given that this is the case and as the land is not a public facility, then Glyndwr are seeking to demonstrate to Sport Wales that their land is not a public resource, which would be protected in the same way a public playing field. At the time of writing this pre-application consultation report, further discussions are ongoing. A copy of the initial response from Sport Wales is included within **Appendix Four**, together with all those responses received from Specialist Consultees.
- 4.13 Alongside the statutory process, Glyndwr University met with the Chief Executive of the Higher Education Funding Council for Wales (HEFCW) on 28th June 2018 and were offered support for the proposals. HEFCW also amended Glyndwr University's Financial Commitments Threshold to allow for Campus 2025 to proceed.
- 4.14 Briefing sessions were also offered to all Wrexham CBC Councillors in respect of Campus 2025, together with relevant Welsh Government Ministers.

5.0 Summary and Conclusions

5.1 A comprehensive pre-application consultation exercise as undertaken by Glyndwr University from 18th June 2018 to 17th July 2018 on all seven submissions which collectively comprise the Campus 2025 package.

5.2 The response level was positive, with over 250 individual responses to the overall consultation. These comments have resulted in

- amendments to the Holt Road masterplan
- detailed technical revisions and additions to the transport work
- additional work being undertaken in respect of foul flows from the Gatewen Road site.
- Further work ongoing regarding car parking at Plas Coch

5.3 As the statutory process outlined within the Town and Country Planning (Development Management Procedure) (Wales) Order 2016 have now been discharged in full, then this report sits alongside the seven submissions which comprise Campus 2025, which are described earlier within this report.

***Narvo Asset Management
August 2018***