12/08/2024

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Dear Sir / Madam,

APPLICATION FOR FULL PLANNING PERMSSION FOR A TEMPORARY STAND EXTENSION

WREXHAM ASSOCIATION FOOTBALL CLUB, STŌK CAE RAS, MOLD ROAD, WREXHAM, LL11 2AH

On behalf of our client, Wrexham Association Football Club Limited ("WAFC"), Savills is instructed to submit an application to Wrexham County Borough Council ("WCBC") for full planning permission for an extension to the Temporary Stand at Wrexham Association Football Club, STōK Cae Ras, Mold Road, Wrexham, LL11 2AH ("the Site").

The Description of Development is:

> *"Temporary Stand Extension (capacity 3,020)"*

Please find enclosed the following drawings and plans submitted as part of this submission:

- Application Form;
- Plans and Drawings (AFL Architects):
  - 231547-AFL-Z4-00-DR-A-20001-Existing Site Plan-P4
  - 231547-AFL-Z4-00-DR-A-20010-Proposed Site Plan-P2
  - 231547-AFL-Z4-ZZ-D-A-20008-Temporary Stand - Proposed Toilets-P3
  - 231547-AFL-Z4-ZZ-DR-A-20004-Kop Temporary Stand Existing Elevations-P3
  - 231547-AFL-Z4-ZZ-DR-A-20005-Existing Temporary Stand Plan-P4
  - 231547-AFL-Z4-ZZ-DR-A-20006-Temporary Stand Landscape Plan-P4
  - 231547-AFL-Z4-ZZ-DR-A-20014-Kop Temporary Stand Proposed Elevations-P3
  - 231547-AFL-Z4-ZZ-DR-A-20015-Proposed Temporary Stand Plan-P2
  - 231547-AFL-ZZ-ZZ-DR-A-20000-Temporary Seats Site Location Plan-P4
- Design and Access Statement (AFL Architects, ref. 231547-AFL-ZZ-ZZ-RP-00001)
- Green Infrastructure Statement (Savills, July 2024)

Background

The previous Kop Stand has been decommissioned and removed from the site having been last used in 2010. Full planning permission for the permanent replacement Kop Stand, to accommodate 5,500 spectator seats, inclusive of a 500 capacity hospitality area, and a 600 capacity exhibition space, new public realm and associated works, was granted on 12 January 2023 (ref. P/2022/0725).

The Kop Development will create a 5,500 capacity general attendance and hospitality stand designed to current Green Guide requirements (operation and safety). This will provide modern high quality accommodation which will re-introduce the important Kop Stand to the stadium and re-create the four-sided Stadium. The replacement Kop Stand will see the overall capacity of the Stadium increase from 10,000 at present (with 3 stands) to 15,000.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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The replacement Kop Stand includes 500 seats in the hospitality on the upper tier of the Kop. The ground floor concourse will be a key circulation space on match day, while accommodating up to 600 visitors on non- match days for events and exhibitions. The Kop Development also includes a relocated Club Shop, enhanced community facilities and offices.

Progress is being made on the delivery of the new Kop Stand with the required discharge of planning conditions and detailed assessment of the costs and construction timeline.

In April 2024, an application was approved for the erection of a temporary stand with a capacity of 2,289 and an additional 20 wheelchair spaces (ref. P/2023/0907). This was due to the significant demand for tickets for WAFC home games and the likelihood that the replacement Kop Stand scheme would not formally commence until summer 2024.

Temporary Stand Extension

Planning permission is now sought for an extension to the approved temporary stand, to provide an additional 681 seats, allowing for an overall capacity of 3,020. The proposed extension will not cause the temporary stand to exceed the capacity of the permanent replacement Kop Stand, which will be able to accommodate 5,500 spectators.

Planning Policy Overview

Development Plan

Wrexham Local Development Plan (2013-2028)

The Wrexham LDP was adopted by the Council on 20/12/23 and covers the period 2013 to 2028. It forms part of the statutory development plan alongside Future Wales: The National Plan 2040.

Policy CF3 (Regional Sports Stadia) states that the continued use of a number of sports stadia, including the STōK Cae Ras, will be safeguarded. Further, the policy notes that any development which would result in the loss of principal use at the Site will not be permitted. Development proposals which enhance existing facilities at the named stadia, including the STōK Cae Ras, will be supported by WCBC. It is clear that the LDP therefore supports the continued use and enhancement of the STōK Cae Ras.

It is considered that the principle of development has already been established through the approval of the Kop Stand in January 2023, and the approval of the temporary stand in April 2024.

Transport and Match Day Access

The consented Kop Stand was supported by a Transport Assessment (Ramboll, July 2022), which was followed by a Transport Technical Note (ref. RAM-TP-WAFC-TN01 P02) in support of the temporary stand application. The Technical Note concluded that the development fell within the parameters of the consented Kop development and, therefore, no additional transport reports were required.

The table below summarises a comparison of the transport features of the proposed temporary stand extension, with the consented temporary stand and the consented Kop Stand.

Feature	Consented Kop Stand	Consented Temporary Stand	Temporary Stand Extension Proposals
Seats	5,500 seats.	2,289 seats plus space for 20 additional wheelchairs.	681 additional seats (3,020 in total).
Hospitality / exhibition space	500 person hospitality area / 600 person non-	None.	

	match day exhibition space.	
On-site parking	No changes to existing car park provision.	
Pedestrian access	A new entrance is proposed from Crispin Lane, otherwise no significant changes to access by foot.	Pedestrians will use the existing entrance from Crispin Lane. The route to the stand will be tarmacked and tickets will be checked close to the temporary stand, so as to minimise queuing on Crispin Lane. (There will be no vehicular access via this route.)
Cycle access	No changes to the cycle parking facilities.	
Rail and bus access	No significant changes to access by public transport.	

Overall, the extension would result in an increase of total seating capacity (approximately 28%) from the temporary stand. However, the proposals would still be much lower than the proposed total seating capacity for the Kop Stand, and therefore it is considered that the temporary stand extension falls within the parameters of both the consented Kop development, and temporary stand.

Drainage

As above, the consented Kop Stand was supported by a Drainage Strategy Report (Ramboll, August 2022), which was followed by a Drainage Technical Note (ref. RAM-C-WAFC-TN01) in support of the temporary stand application. It was concluded that given the temporary stand would provide capacity for a significantly lower number than both the consented and historic Kop with a capacity of 2,309 it was assessed to be 'within' the parameters of the consented scheme. Therefore, no additional drainage reports were required to support the temporary application.

The table below provides a comparison of the proposed temporary stand extension, with the consented temporary stand and the consented Kop Stand in drainage terms.

Feature	**Consented Kop Stand**	**Consented Temporary Stand**	**Temporary Stand Extension Proposals**
Seats	5,500 seats.	2,289 seats plus space for 20 additional wheelchairs.	681 additional seats (3,020 in total).
Hospitality / exhibition space	500 person hospitality area / 600 person non-match day exhibition space.	None.	
External works	Proposed hard landscaping to the front of the development with porous surfacing pitchside of the proposed Kop.	No permanent change to the existing site surfacing.	
Foul water drainage	Discharge into the Welsh Water network, capacity restricted to 5000 (capacity of the historic stand) until phosphate permit / discussions are complete and approval for additional capacity	All foul water to be collected and discharged off site with no positive connection into the Welsh Water network.	

	is accepted.	
Surface water drainage	Discharge to ground via infiltration. Strategy is the same as the existing site status with no positive connection to any sewer network / water courses.	No change to the existing site drainage where water hits the site and naturally infiltrates to the ground.

Overall, the temporary stand extension does not propose any changes to the existing current site strategy, with water hitting the surface and infiltrating to ground through the surface finishes. In terms of foul water, the temporary stand extension does not discharge to the Welsh Water network, with no connection to be made until the consented Kop development is constructed. The capacity of the temporary stand extension is 2,480 fewer than the historic Kop, and therefore foul loads will continue to be significantly less.

Waste Water

A Wastewater Management Statement (Savills, February 2024) was submitted in support of the temporary stand, and outlined that the foul water from the temporary stand will be discharged off site through the use of portable toilets with self-contained foul tank and will not be positively connected into the Welsh Water below ground drainage infrastructure. The allowable discharge for the consented Kop application (P/2023/0248) is a peak of 16 l/s which is significantly more than the temporary stand (ref. P/2022/0725).

The temporary stand extension includes the provision of 4no. additional toilets: 2no. x Male. 2no. x Female, which will only be available to home fans and remain in place for a number of months prior to the construction of the permanent Kop Stand.

As with the previous temporary stand application, the self-contained tanks will be emptied after each match by Universal Tankers, who will provide a Waste Transfer Notice noting their licence numbers and waste location. Universal Tankers are an accredited provider of portable toilets. Universal Tankers will only be using Ellesmere Port Waste Water Treatment Works for discharge, which is an A23: Biological Treatment Facility in Cheshire. Please see details below:

Permit number	UP3492CP
Waste Management Licence No.	53444
Pre-EA Permit Ref	53444
Licence Holder Name	UNITED UTILITIES WATER LIMITED

The Permit has been provided alongside this statement, which authorises United Utilities Water plc (“the operator”) to operate a waste operation at Ellesmere Port Waste Water Treatment Works.
The Permit states that the operator shall take appropriate measures to ensure that:

> (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
> (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
> (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review. The total quantity of waste accepted at the site shall be less than 450,000 tonnes a year.

Given the temporary stand extension will provide capacity for a significantly lower number than both the consented and historic Kop, it is considered that foul loads will remain significantly less. The additional four

toilets, which will be for home fans only on match days, are provided as part of the temporary construction which will only be in place for a number of months, and do not discharge to the Welsh Water network, it is considered that the temporary stand extension falls within the parameters of the previously consented temporary stand.

Noise

The consented Kop Development was supported by a Noise Impact Assessment prepared by Ramboll in 2022 (ref. RUK2021N00485-RAM-RP-00004) which concluded that overall, the mode of operation of the stadium during matches is unlikely to significantly change when compared to existing operations. As a result, noise impacts during match day activities will generally be at or below the noise levels currently experienced at the nearest sensitive receptors. The same applies to road traffic and pedestrian access to the grounds.

A Technical Note was prepared by Ramboll (ref. RAM-AE-WAFC-TN01), in support of the temporary stand, which concluded that it would have no effect on the current noise levels experienced by receptors closest to the stand.

The table below provides a comparison of the proposed temporary stand extension, with the consented temporary stand and the consented Kop Stand in terms of noise.

Feature	**Consented Kop Stand**	**Consented Temporary Stand**	**Temporary Stand Extension Proposals**
Seats	5,500 seats.	2,289 seats plus space for 20 additional wheelchairs.	681 additional seats (3,020 in total).
Canopy	Yes	No	
Hospitality / exhibition space	500 person hospitality area / 600 person non-match day exhibition space.	None	
New plant	Roof top plant, including air source heat pumps and air handling plant	Generator to power toilets	

It is considered that the change in noise from the consented temporary stand to the temporary stand extension would be marginal. When compared with the noise proposed to be generated from the consented Kop Stand, the temporary stand extension will have no effect on the current noise levels experienced by receptors closest to the stand.

EIA

In June 2022, a screening request was made to determine whether the Kop Stand proposals triggered the need for formal Environmental Impact Assessment (EIA). It was concluded that the proposals did not trigger the need for EIA. Given this, it is not considered that the Temporary Stand extension will trigger EIA.

I trust that the application and supporting documents are in order and that the application may be registered and validated without delay. If there is anything I can do to assist or accelerate your consideration of this application, please do not hesitate to contact me.

Yours faithfully



Portia Banwell
Associate Director