

20/09/2024



Planning Department
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Portia Banwell
E: portia.banwell@savills.com
DL: +44 (0) 7866 051307

2 Kingsway
Cardiff CF10 3FD
T: +44 (0) 29 20 368900
F: +44 (0) 29 20 368999
savills.com

Dear Sir / Madam,

APPLICATION FOR FULL PLANNING PERMSSION FOR A FAN ZONE

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 a Fan Zone at Wrexham Association Football Club, STŌK Cae Ras, Mold Road, Wrexham, LL11 2AH ("the Site").

Formed in 1864, WAFC is the oldest club in Wales and the third-oldest professional association football team in the world. WAFC is currently competing in EFL League One, having secured promotion in each of the last two seasons.

Following WAFC's acquisition in 2020 and the associated exposure from *Welcome to Wrexham*, there has been significant increase in the Club's visibility, the level of interest in the team's games and a broadening of community activities also. As such, WAFC is excited to further enhance the match day experience to fans, and the wider community through the provision of a Fan Zone. The Fan Zone will provide a safe entertainment space for WAFC fans to attend before matches, as well as having the potential to be used as an additional event space on an ad-hoc basis on non-matchdays.

Accordingly, please find enclosed the following drawings and plans submitted as part of this submission:

- Application Form & Ownership Certificates;
- Plans and Drawings (AFL Architects):
 - 231547-AFL-Z7-ZZ-DR-A-20016-Wrexham AFC Fan Zone Site Location Plan-P4
 - 231547-AFL-Z7-ZZ-DR-A-20017-Fan Zone Landscape Plan-P2
 - 231547-AFL-Z7-ZZ-DR-A-20018-Fan Zone proposed Elevations-P2
 - 231547-AFL-Z7-ZZ-DR-A-20019-Fan Zone Plan-P2
- Design and Access Statement (AFL Architects, ref. 231547-AFL-ZZ-ZZ-RP-A-00002 Wrexham AFC Fan Zone Design & Access Statement - Rev P3)
- Surface Water & Foul Water Strategy (Willis Hazell, August 2024)
- Noise Impact Assessment (Savills, September 2024)
- Transport Statement (Apex Transport Planning Ltd, September 2024)

Site Description

The proposed Fan Zone will be located off Crispin lane at the STŌK Cae Ras at Wrexham AFC, behind the existing temporary stand. The Site covers an area of 0.14ha.

To the north west of the Site is the Wrexham Glyndwr University Campus including the Students' Union and the William Aston Hall. Immediately to the north is the Wrexham Student Village, beyond that are sports pitches associated with the University and further University buildings. The east of the Site is bound by Crispin Lane, beyond that is the railway line and Wrexham General Rail Station. South west of the Site is

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Mold Road (A541) and an area of residential properties to the south of the road. Beyond that is Technology Park and the Wrexham Maelor Hospital.

The Site falls within Flood Zone A, and therefore is considered to be of little or no risk of fluvial or coastal / tidal flooding.

The Site itself has no known heritage assets or historic environment constraints. At a local level, the nearest listed buildings are Plas Coch (part of the University) (Grade II) approximately 500m to the north west and Wrexham General Rail Station (Grade II) approximately 500m to the south east. The nearest conservation area is Grosvenor Road Conservation Area approximately 700m to the south west.

There are no known Tree Preservation Orders across the Site.

The Site is not subject to any 'sensitive area' designations as set out within the 2017 Regulations¹.

Planning History

The STōK Cae Ras has been home to WAFC since being formed in 1864, evolving over time as investment is made in new stands and additional facilities. As a result, there have been a number of planning applications at the STōK Cae Ras. Table 1.1 below presents the relevant planning applications made relating to the STōK Cae Ras (i.e. the wider stadium as opposed to just the application Site).

REFERENCE	DESCRIPTION	DECISION	DECISION DATE
P/2023/0907	Erection of temporary stand (capacity 2,289) with additional 20 wheelchair spaces (in retrospect)	Granted	10/04/2024
P/2022/0725	Kop development for 5,500 spectator seats, inclusive of a 500 capacity hospitality area, with a 600 capacity non-match day exhibition space, new public realm and associated works	Granted	12/01/2023
P/2022/0548	Erection of freestanding and stand mounted floodlights (and associated works)	Granted	19/10/2022
P/2022/0515	Prior notification of demolition of buildings (existing Kop)	Granted	24/06/2022
P/2013/0215	Erection of four signs at Glyndwr University Racecourse Stadium	Granted	26/04/2013
P/2012/0717	New entrance doors and accessible ramp for club shop	Granted	22/11/2012
P/2012/0718	New signage for club shop	Granted	21/11/2012
P/2012/0275	Erection of 1 no. Fascia Sign	Granted	15/05/2012

Table 1.1 - Planning History of STōK Cae Ras

Wider Site

In 2006 part of the Racecourse Ground and adjoining land was subject to a redevelopment scheme for the demolition of the existing east stand and existing car showroom to facilitate a mixed use development comprising of private residential apartments, student accommodation units, retail, site for new stand and

¹ (Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017)

associated works (Planning ref. P/2006/0443). Further, a reserved matters application pursuant to the outline planning permission above was submitted (Planning ref. P/2007/0125).

Adjacent to the Site there were two applications for the erection of 521 / 319 student bedroom development, construction in two blocks, together with access road, parking and development of east stand / multi-function arena which were granted in April 2009 (Planning ref. P/2008/1296/ and P/2008/1295).

More recently, two outline planning permissions were submitted. An application was granted for up to 410 residential units with car parking, landscaping, and associated infrastructure (Planning ref. P/2018/0671). Various reserved matters applications have been submitted following the outline approval, with the application reduced to 90 detached and semi-detached homes (P/2021/0094). An outline planning permission was granted for student accommodation facility up to 197 bed spaces, parking, and landscaping (Planning ref. P/2018/0672). An application for Reserved Matters was submitted in June 2022 (Planning Ref. P/2022/0551), and was approved in April 2023.

Proposed Development

WAFC is proposing further investment into the STōK Cae Ras and its facilities through the development of a Fan Zone behind the existing temporary stand. WAFC is keen to improve the matchday experience for its fans, and the Fan Zone is crucial in offering facilities expected of a football club with such high visibility and a global fanbase. As such, a full planning application is being submitted to WCBC, with a description of development as follows:

“Siting of timber clad concession stands, marquee, stage, fencing and associated works to create a ‘Fan Zone’”

It is anticipated that the Fan Zone will be used on home matchdays, opening three hours before kick-off and closing one hour after the final whistle. It is also proposed to be used at half time, but not whilst the game is in progress. The space could also be used on non-match days on an ad-hoc basis for other events, and will be limited to a capacity of 1500 at all times.

The Fan Zone will consist of a 15x20m marquee with a stage on the south side to be used for live music. There will also be a large screen TV, merchandise trailer, toilet facilities and timber clad concessions, as well as an area assigned for 5no. further pop-up concession stands, which will include licensed bars and food outlets. New tarmac is proposed to match the surface in the adjacent temporary stand areas.

Access to the Fan Zone will be the same as the temporary stand (as existing) off Crispin Lane. Once ticket holders go through the ticket check gate, those who hold the appropriate tickets will be granted access to the Fan Zone.

Further details are provided in the accompanying documents and drawings.

Planning Policy Overview

Future Wales: The National Plan 2040

The Welsh Government formally adopted “Future Wales: The National Plan 2040 (Future Wales)” in August 2019 and has been updated in February 2021. Future Wales outlines the Welsh Government’s strategies for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, delivering growth in the right areas, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities. Future Wales now forms part of the statutory development plan.

Future Wales sub-divides Wales into four regions with the application Site located within the North region. A total of 36 policies are contained within Future Wales of which 19 are thematic and the remainder relate to the four regions.

The following themes and pertinent policies are discussed below because they may be relevant to the determination of this planning application.

Location and Shape of Growth

Policy 1: Where Wales Will Grow identifies a series of National and Regional Growth Areas within which new development is generally to be focussed. One of the National Growth areas is Wrexham and Deeside, which includes the development Site.

Policy 2: Shaping Urban Growth and Regeneration states that growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. It then goes on to identify seven key principles for placemaking:

- Creating a rich mix of uses;
- Providing a variety of housing types and tenures;
- Building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;
- Increasing population density, with development built at urban densities that can support public transport and local facilities;
- Establishing a permeable network of streets, with a hierarchy that informs the nature of development;
- Promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders, and;
- Integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment.

Policy 3: Supporting Urban Growth and Regeneration – Public Sector Leadership notes that the Welsh Government will play an active role in supporting urban growth and regeneration. The public sector should show leadership and apply placemaking principles to ensure sustainable places.

Policy 12: Regional Connectivity encourages a modal shift away from the private car by incorporating measures that encourage active travel and the use of public transport.

National Growth Area: Wrexham and Deeside

Policy 20: National Growth Area – Wrexham and Deeside identifies that the area will be the main focus for growth and investment in the North Region. Wrexham and Deeside will be recognised as areas of focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing and transport infrastructure.

Development Plan

Wrexham Local Development Plan (2013-2028)

The Wrexham LDP was adopted by the Council on 20th December 2023 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.

Policy SP8 (Economic Growth, Employment and Enterprise) seeks to ensure the continued role of the County Borough as a key economic driver in North Wales and the wider region by maintaining and enhancing the tourism, culture and leisure offering by taking into account the unique character, local distinctiveness and heritage of the area and its context in the wider sub region.

Other Material Planning Considerations

Planning Policy Wales (Edition 12) (February 2024)

Planning Policy Wales (“PPW”) forms the overarching national planning policy documents within Wales, providing guidance to LPAs about the determination of planning applications through their development management functions. Although it does not have development plan status, it is capable of being a material consideration in the determination of planning applications.

Paragraph 1.18 states that there is a presumption in favour of sustainable development in accordance with the development plan for an area unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.

Assessment

Principle of Development

The Site is located in a sustainable location within the existing STōK Cae Ras, which has been identified as a stadium to be safeguarded and facilities enhanced in the LDP, and where the introduction of additional uses complementary to the site's principal use are supported. This is due to the STōK Cae Ras' contribution to the quality of life of WCBC residents, as well as to the County Borough's identity and economic vitality.

The proposals will provide a complementary use to the established use at STōK Cae Ras as a major sports venue, adding to its vibrancy and act to diversifying the Borough's cultural, leisure and tourism facilities in accordance with Policies CF3 and SP8 of the LDP.

The planning policies and corporate objectives of the Borough are to enhance the County Borough's tourism, culture and leisure offer taking into account the unique character, local distinctiveness and heritage of the area and its context in the wider sub region, as well as retaining the existing principal use of sports stadia, which the proposals fully accord to.

The proposal will also support a range of jobs and employment opportunities, once operational, thereby contributing to the local economy, and supporting the LDP's objective 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.

In view of the above, and the aim to create a sustaining and developing a vibrant economy, and delivering growth in the right areas as set out in Future Wales, it is considered that the principle of establishing a Fan Zone within the curtilage of the STōK Cae Ras is accordance with the Future Wales and development plan.

Amenity

Policy DM1 of the LDP requires development to not have an unacceptable effect on the amenity of the occupiers of nearby properties/land; and provide a satisfactory standard of amenity for the occupiers/users of the development itself. Paragraph 2.7 of PPW12 notes that placemaking in development decisions happens

at all levels and involves considerations at a global scale, down to the very local level, such as considering the amenity impact on neighbouring properties and people.

The nearest residential dwellings to the Site lies approximately 50 metres to the south on the opposite side of Mold Road. There are also several blocks of student accommodation approximately 50 metres to the north of the Site. Considering the distance from the Site to the neighbouring residential properties, it is considered that the development would not cause any adverse impact upon residential privacy or amenity. Additionally, it is considered that any existing or future occupier of nearby residential / student accommodation is aware of its setting adjacent to a large football stadium, and thus it is reasonable to assume their general acceptance to match day activities at the STōK Cae Ras and its curtilage.

As a result, the proposals are not expected to have significant adverse impact on the amenity of nearby occupiers.

Noise

A Noise Impact Assessment (NIA) has been undertaken by Savills to establish if operation of the Fan Zone would be compliant with relevant national and local planning policy and guidance upon which the planning application will be determined. A fundamental part of this consideration is whether noise emissions (noise received at receptors) from the events are likely to result in complaint from NSRs assuming a normal subjective response to noise.

The closest noise sensitive receptors (NSRs) to the proposed fan zone are the Wrexham Student Village student accommodation located adjacent to the site, as well as properties on Mold Road approximately 100m to the south.

The results of the assessment show that the operation of the proposed Fan Zone, including the ad hoc screenings of away day matches, would result in minimal adverse impact at the nearest residential dwellings, of a similar magnitude and character that currently effects the area.

Whilst some adverse effects may result these would be limited to daytime periods only, i.e. not affecting sleep, and would be limited in terms of the number of times per year these occur. Furthermore, the character of the sound is in keeping with the general use of the site, i.e. fans of the local community congregating to watch football.

Consequently, from a noise perspective, operation of the fan zone would be compliant with National Planning policy and Local Planning Policy as well as guidance set out in the Code of Practice on Environmental Noise Control at Concerts document.

Transport

The Application is supported by a Transport Statement prepared by Apex Transport Planning Ltd which provides the necessary information for the Local Highway and Planning Authority to consider the merits of the proposals in terms of location, connectivity, highway safety, parking, access and the impact on the local highway network.

The Fan Zone will only be available to those who have purchased a matchday ticket; therefore, the proposals would not generate any additional trips to the stadium on matchdays, and conversely could have a positive impact due to increased visitor dwell time and a resulting reduced concentration of visitors arriving immediately before kick-off, or departing immediately following the final whistle.

For non-matchdays, when considering the consented capacity of 600 for the non-matchday exhibition space, the Fan Zone proposal would provide an additional capacity of 900 to that of the consented. However, the consented exhibition space would typically operate between was 09:00 and 17:00 on weekdays, with some

events occurring in the evenings; whereas the proposed Fan Zone will only operate during the evenings (outside of the local peak periods) on weekdays and during the day on weekends.

There is sufficient capacity for both weekday and weekends to accommodate the likely parking demand for the Fan Zone, however, given the nature of the proposed development with the licensing of alcohol on the premises, it is considered reasonable to suggest that the Fan Zone will likely reduce the existing percentage of car trips to the stadium and increase sustainable modes of travel.

In addition, the local highway network and public transport connections accommodate much higher demand on matchdays, which provides a worst-case scenario in terms of trip generation to and from the site. Therefore, it follows that the relatively low-level of trips generated by the Fan Zone on non-matchdays can also be suitably accommodated on the network, especially as they occur outside of the network peak periods.

Access

Access to the Fan Zone will be via the existing access on Crispin Lane which serves the current temporary stand. Once ticket holders gain access via the ticket gate, entry to the fan zone will be granted for those with the appropriate tickets.

No amendments to the highway are proposed, with only internal circulation and controls beyond the ticket check gates.

Drainage

Foul Drainage

The strategy follows the same approach to that submitted for the original temporary stand application where the spectator capacity of the temporary stand is lower than that of the consented scheme.

The capacity of the consented Kop Stand is 5,500 and the capacity of the temporary stand has been increased to 2,964. In addition, the Fan Zone has been added to the rear of the temporary stand which has a capacity of 1,500. However, the 1,500 capacity for the Fan Zone forms part of the existing capacity of the stadium – ie not additional.

Using a pro-rata method to establish the increased foul flows on the figures calculated by Ramboll in the original temporary stand application the revised foul flow rate is 8.23l/s. This remains below the consented peak of 16l/s.

Surface Water

The Fan Zone will create an additional area of hardstanding on the Site. The surface water strategy adopted here is to follow the same principles as the original temporary stand application and maintain the original site characteristics. There were no positive surface water connections on the Site previously and the surface water infiltrated to ground. Infiltration tests were undertaken as part of the Kop Stand design which confirmed infiltration is viable. Reference should be made to the Ramboll report attached for infiltration test results.

Consequently, the new area of hardstanding has been specified as being fully permeable, with open graded permeable asphalt on a Type 3 sub-base with 30% voids to allow the water to infiltrate to ground.

Safety, Security and Management

The Fan Zone will be the subject of careful management as part of the Club's operations to ensure the safe and effective operation of the STōK Cae Ras as a whole.

The Fan Zone will be appropriately staffed, including by SIA trained staff, to ensure capacity is not exceeded, security searches undertaken and anti-social behaviour strictly managed. Full stand checks will be carried out both prior to and following a match in all stands and Fan Zone. It is also worth noting the Fan Zone will adhere to its requirements and obligations under its licence under the Licensing Act 2003.

Public Benefits Including Economic, Social And Environmental

A primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the economic well-being of Wales, amongst other things, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. Chapter two states that the planning system should enable development which contributes to long term economic well-being, making the best use of existing infrastructure and planning for new supporting infrastructure and services. Local planning authorities should consider the contribution development would make to achieving wider strategies, for example the growth or regeneration of certain areas. Therefore, significant weight should be placed on the need to support economic growth through the planning system.

Policy SP8 of the LDP seeks to ensure the continued role of the County Borough as a key economic driver in North Wales and the wider region. The proposals represent investment by the Club into the local area, sustaining local jobs and vibrancy. As a result, there are considered public benefits in support of the proposed development.

Green Infrastructure Statement (GIS)

Updated policy within PPW (Edition 12, February 2024) includes the requirement for all planning applications to be accompanied by a proportionate GIS describing how green infrastructure has been incorporated into the proposal and demonstrate how the 'step-wise approach' has been followed (Paragraph 6.4.21). The Site covers an area of 0.14ha, and is located entirely on hardstanding. The fabric of the Site is completely hard in nature, with no existing vegetation. There is therefore no biodiversity or environmental quality within the Site.

PPW states that the GIS will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach has been applied.

The step-wise approach is ordered as per: (1) avoid; (2) minimise; (3) mitigate/restore; compensate on site (4); and (5) compensate off site.

(1) Avoid

Due to the nature of the Site, and the protection of continued use and enhancement of sports stadia, including STōK Cae Ras, in the Wrexham County Borough Local Development Plan (LDP) 2013 – 2028, the development is unable to be located elsewhere. However, regardless of this, the entirety of the Site consists of previously developed land, comprising hard standing (sealed surface). It is considered that the Proposed Development would not have any significant adverse effects on ecology or biodiversity.

(2) Minimise

Given the Site does not contain any existing vegetation, the Proposed Development therefore does not have any negative effects on ecology or biodiversity.

(3) Mitigate/restore

As the Site does not contain any existing vegetation, the Proposed Development therefore does not have any negative effects on ecology or biodiversity.

(4) Compensate on site

As the Site does not contain any existing vegetation, the Proposed Development therefore does not have any negative effects on ecology or biodiversity, and therefore it is not necessary to provide compensation on Site.

(5) Compensate off site

As the Site does not contain any existing vegetation, the Proposed Development therefore does not have any negative effects on ecology or biodiversity, and therefore it is not necessary to provide compensation off Site.

Overall, the Proposed Development will result in the efficient re-development of a previously developed (brownfield) Site and have no adverse impacts on ecology or biodiversity.

Conclusion

The Fan Zone will assist in attracting visitors to the STōK Cae Ras, enhancing the experience of those attending on matchday and non-match days, contributing to the established use at STōK Cae Ras as a major sports venue, adding to its vibrancy and act to diversifying the Borough's cultural, leisure and tourism facilities. The proposal will support jobs and provide investment and expenditure locally. The Fan Zone will broaden the leisure offer of the STōK Cae Ras, and therefore complies with a number of local planning policies.

I look forward to receiving confirmation that the application has been registered in due course. Should you require any further information, please do not hesitate to contact me.

Yours faithfully



Portia Banwell
Associate Director