Planning, Design, and Access Statement (Areas 1 & 3)

Project Aurora

Kellogg Company of GB Limited

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Basis of Report

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1.0 Introduction

This Planning, Design, and Access Statement (PDAS) has been prepared by SLR Consulting Limited (SLR) on behalf of Kellogg Company of GB Limited ('the Applicant') in support of a Planning Application being made to Wrexham County Borough Council (WCBC) to gain consent for the *"Proposed installation of temporary storage, welfare and office facilities (Areas 1 & 3) for a period of 24 months (2 years) and associated works"* at Kellogg's Wrexham manufacturing site, situated at Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT.

This application would allow for the installation of office and welfare facilities, these facilities are required on a temporary basis for up to 24 months (2 years) to support the project team undertaking a range of internal construction and production line expansion works. These works are anticipated to take 18 months to complete, but the temporary consent is seeking to accommodate a 'fallback' position of 24 months to allow for any unexpected project delays. All temporary storage, welfare and office facilities would be removed from the Site following completion of the works.

Further information regarding the development proposal is provided within Section 3 of this report, whilst the content of the planning application submission is detailed within Section 1.4 below.

This application relates to the areas known as Area 1 (Scope 1) and Area 3 (Scope 3) only, a further application for Area 2 (Scope 2) has also been submitted to the Council.

1.1 The Applicant and Landownership

1.1.1 Landownership and Applicant

Kellogg Company of GB Limited is a subsidiary of Kellanova that is responsible for the company's UK-based operations associated with the Kellogg's brand, including manufacturing at the Wrexham site. Kellogg Company of GB Limited is the freehold landowner and applicant for this application.

1.1.2 Kellanova

Kellanova (formerly Kellogg Company) is a cereal business home to brands including Kellogg's, Froot Loops and Rice Krispies, after company founder W.K. Kellogg, who created Corn Flakes in 1894. They are an American multinational food manufacturing company headquartered in Battle Creek, Michigan, United States. Kellanova produces cereal and convenience foods, including crackers and toaster pastries, and markets its products with several well-known brands, as previously mentioned.

Following on from the opening of the first UK Kellogg's factory (Trafford Park, Manchester) in 1938, Kellogg's opened its second UK factory in Wrexham, North Wales. The site was officially opened by HRH Princess Alexandra on 28th April 1978.

1.1.3 SLR Consulting Limited

Established in July 1994, SLR is a leading international environmental consultancy with an unrivalled reputation for providing expert, tailored services. With more than 100 offices across Europe, North America, Asia Pacific, and Africa, SLR is one of a very small number of truly international specialists providing advice and support on a wide range of strategic and site-specific issues, to a diverse and growing base of business, regulatory and governmental clients.

SLR specialises in the built environment, financial services, industry, infrastructure, mining & minerals, oil & gas and power sectors, delivering expert sustainability advice and project management support across these sectors.

SLR provides multidisciplinary advice, to both public and private sector clients, from in-house experts on a wide range of strategic and site-specific environmental and sustainability issues. SLR is nearly 3000 strong Worldwide spread throughout more than 100 Offices.

SLR is also recognised by the Institute of Environmental Management and Assessment ('IEMA') as a recommended consultancy to review Environmental Statements ('ES') for Environmental Impact Assessments ('EIA'). Further information on SLR can be found on its website: www.slrconsulting.com

1.2 Reason for Application

Kellanova is due to cease all operations at its Manchester Site by 2026, opting to move all production to its manufacturing facilities based within the Wrexham Industrial Estate site.

As a result of this move, the expansion of the production lines at the Wrexham factory is required. This will involve the dismantling of process and packing equipment, demolishing internal partitions and MEP installations, refurbishment of several areas, construction of a new Allergen area (which involves also new lockers and a new conditioned area for storage of Raw Materials) and installation of new process/packing equipment for the new production lines.

The majority of the internal works will not necessitate planning permission, albeit a separate application for external works, including the installation of additional plant and machinery on the roof of the building, will be submitted in due course.

As a result of the proposed construction works, a set of temporary storage, welfare and office facilities will be required on-site to aid the contractors and project management team. Further information regarding the proposed temporary facilities is provided within the description of the development section of this PDAS (Section 3.0).

1.3 Contents of Planning Application

This planning submission to WCBC comprises the following technical information and documents:

- Planning, Design, and Access Statement *(this document)*;
- Planning Application Forms and Certificates;
- Application Drawings including:
    - Site Location Plan Scope I & III @ Scale 1:2500 (dwg no. BPUK-124-C-501-A-LAY-0010-01);
    - Existing Site Layout Plan – Scope I @ Scale 1:200 (dwg no. BPUK-124-C-501-A-LAY-0012-00);
    - Existing Site Layout Plan – Scope III @ Scale 1:200 (dwg no. BPUK-124-C-501-A-LAY-0013-00);
    - Proposed Site Layout Plan – Scope I @ Scale 1:200 (dwg no. BPUK-124-C-501-A-LAY-0015-00);
    - Proposed Site Layout Plan – Scope III @ Scale 1:200 (dwg no. BPUK-124-C-501-A-LAY-0016-00);

- Proposed Elevations @ Scale 1:200 (dwg no. E2712C-E REVB); and
- Foul Drainage Connections Plan – Scope III @ Scale 1:200 (dwg no. BPUK-124-C-501-M-SIT-0016-0).

1.4 Assessment of the Proposal and Report Structure

As identified within Planning Policy Wales, planning applications should be determined in accordance with the approved or adopted development plan unless material considerations indicate otherwise.

This Planning, Design, and Access Statement seeks to provide a background and overview of the application proposal and an assessment of compliance with regard to relevant national and local policy. This document is structured as follows:

- Section 1 – Introduction;
- Section 2 – Site Location, Setting, and Description;
- Section 3 – Proposed Development;
- Section 4 – Design and Access;
- Section 5 – Planning Policy Context;
- Section 6 – Material Considerations; and
- Section 7 – Summary and Conclusions.

2.0 Site Location, Setting, and Description

This Section of the PDAS provides a description of the Site, the surrounding area, and provides an overview of relevant planning history, and should be read in conjunction with the application drawings.

2.1 Wider Site Context

Kellogg's Wrexham is situated within the Wrexham Industrial Estate on Bryn Lane, Wrexham, LL13 9UT. Wrexham Industrial Estate is located approximately 2km to the east of the urban area of Wrexham and is accessed via the A534 which provides onward links to the A5156 and A483 beyond.

The industrial estate, which houses a number of industrial and commercial units, is located approximately 1.77km to the east of Wrexham. The Kellogg's factory is situated on the northeastern side of the wider industrial estate. The National Grid Reference (NGR) for the approximate centre of the Site is **SJ 38817 50552**.

Below, **Figure 2-1** provides a contextual image of Kellogg's Wrexham site and the surrounding Wrexham Industrial Estate.

Figure 2-1: Aerial Image of Site



While the Site is largely set within a commercial/ industrial area, three residential properties are located immediately to the north, adjacent to the Ridley Wood Industrial Complex. A further residential property is located to the northwest, beyond Bryn Lane. Nevertheless, the surrounding area predominantly comprises a mixture of manufacturing, industrial, warehouse and waste recycling site uses.

To the north, the Site is bound by other industrial and commercial units, to the northwest is the Bryn Business Centre retail park, which houses CrossFit Wrexham, and All4Pets. Directly to the north, are other business units. Further afield, Bryn Lane bounds the entire Industrial Estate, beyond this are agricultural fields. Also to the north are the three residential units that have previously been discussed above.

2.2 Application Site

2.2.1 Kellogg's Site

The Application site is located within the wider Kellogg's manufacturing site, which is within the freehold land ownership of the applicant. The Kellogg's Wrexham site is approximately 17.9 hectares in area and comprises a large factory building (c. 43,000 sq m) and offices (c. 2,400 sq m) within the centre of the site. This wider site is identified by the blue line on the submitted Site Location Plan – Scope I & III (drawing no. BPUK-124-C-501-A-LAY-0010-01).

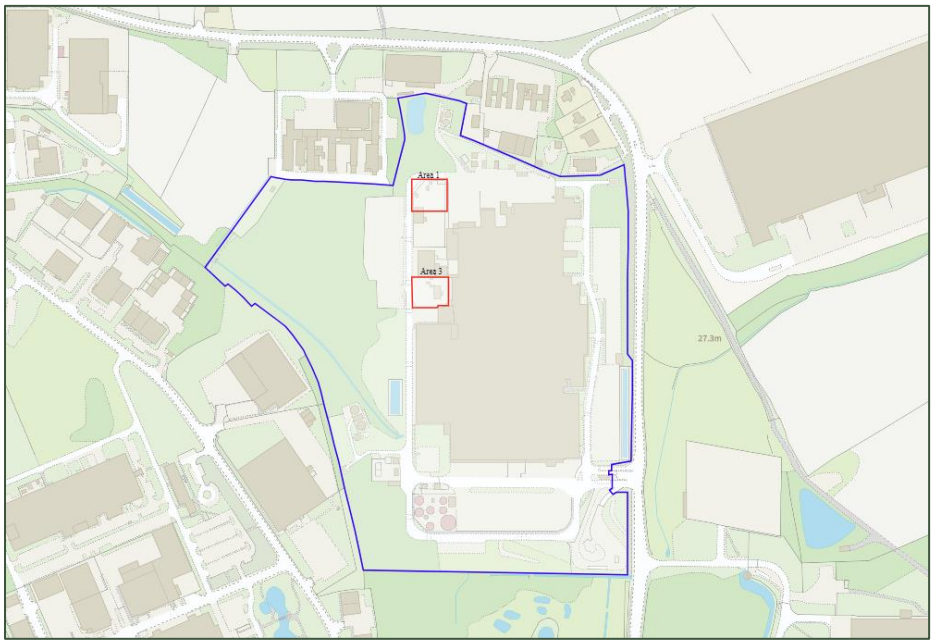
There is an internal road that encircles the central factory building allowing cars and HGVs to access all areas of the Site, whilst there are areas of parking situated along the eastern and western boundaries. There is also a weighbridge, associated with the HGV trailer parking to the southeast. The site is accessed via an entrance from Bryn Lane to the southeast of the Site, whilst loading bays are located on the northern and southern

The remainder of the site comprises soft landscaping, including areas of grass, trees and three ponds located within the north, east, and west. The wider site is also bound by areas of mature tree belts and further grassland and ponds.

2.2.2 Application Site Area

The Application Site comprises two areas situated along the western edge of the main factory building; for ease of reference, these are referred to as 'Area 1' and 'Area 3', Area 1 is situated to the north of the wider site whilst Area 3 is situated centrally within the wider site area. **Figure 2-2** shows an entire Site with the Areas highlighted, as shown both areas are situated along the factory's western boundary; these areas are described in more detail below.

Figure 2-2: Site Areas



2.2.2.1 Scope 1 (Area 1)

Area 1, referred to as Scope 1 on the Site Layout is situated to the northwest of the factory building and currently comprises existing temporary offices, contractors' compound and

other containerised storage. **Figure 2-3** below show the red line boundary of Area 1 which equates to approximately 1,394 m^2.

Figure 2-3: Red Line Boundary for Area 1



2.2.2.2 Scope 3 (Area 3)

Area 3, referred to as Scope 3 on the Site Layout, is situated to the west of the factory building, and the south of Area 1. This area is situated in the same compound as Area 1 and is currently comprised of containers.

Area 3 is approximately 1,667m^2 and is shown in **Figure 2-3** below.

Figure 2-4: Red Line Boundary for Area 3



2.2.3 Further Applications associated with the Site

As stated previously, this submission is one of two temporary applications being submitted to the Council to support the works being undertaken at the Kellogg's site

The other application submitted relates to a further office and welfare compound known as 'Area 2' (Scope 2), which is situated to the south of the factory building. **Figure 2-5** shows Area 2 below.

Figure 2-5: Red Line Boundary for Area 2



2.2.4 Environmental Constraints

As the Site is located within an existing Industrial Estate and is designated as a key employment area within the Wrexham Local Development Plan (Polices EM1 and EM2) there are few environmental designations situated on or near the Site.

2.2.4.1 Landscape Designations

The Site is situated within National Landscape Area (NLA) 13, Glannau Dyfrdwy a Wrescsam (Deeside and Wrexham). This NLA covers a large area with a wide variety of characteristics, this includes a rich industrial heritage that carries through to the present day.

2.2.4.2 Ecological Designations

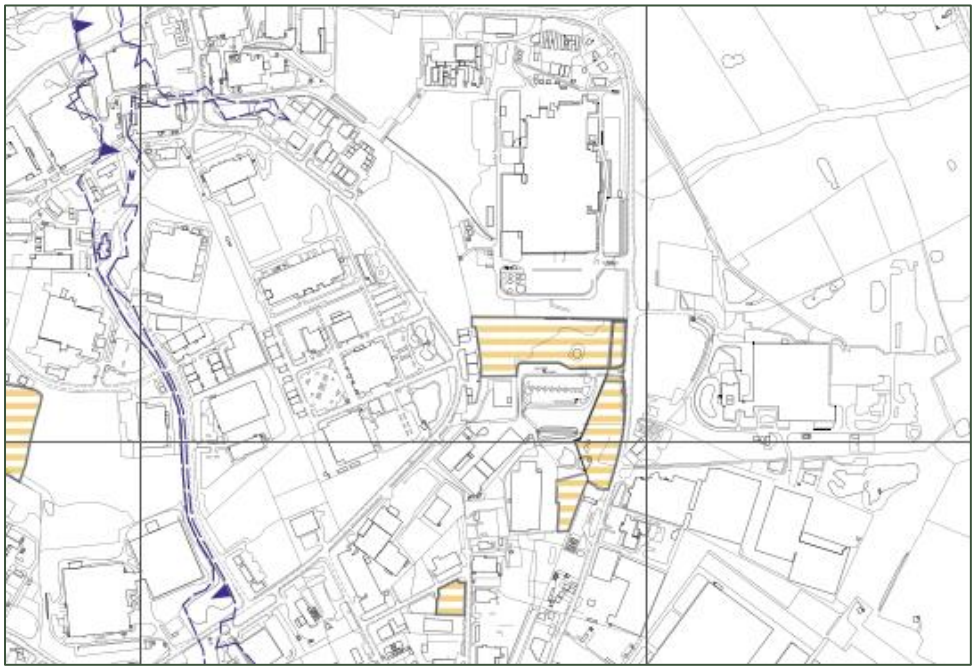
In terms of ecological designations, there are no designations situated on or near the Site, this includes Local Nature Reserves (LNR), National Nature Reserves (NNR), Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar Sites, Sites of Special Scientific Interest (SSSI), and Areas of Outstanding Natural Beauty (AONB).

The closed ecological designation to the Site is the Afon Dyfrdwy (River Dee) SSSI, which is situated approximately 2.42km to the east of the Site.

There are some areas of Ancient Woodland situated within the Wrexham Industrial Estate, however, none directly bound the Site.

On a local scale, there is a Local Designated Site of Nature Conservation and Geological Importance (Policy NE2) situated to the South of the Site. **Figure 2-6** below shows the constraints map sourced from WCBC that highlights this.

Figure 2-6: Constraints Map



2.2.4.3 Archaeology and Heritage

In terms of Archaeology and Heritage, there are no Scheduled Monuments or Listed Buildings situated on or near the Site.

The nearest Listed Buildings to the Site include:

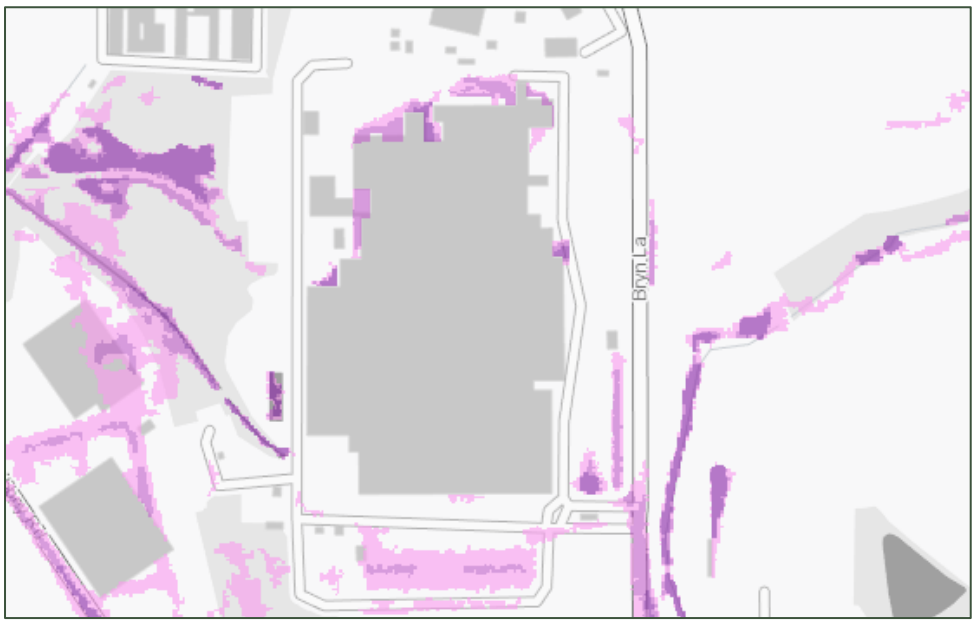
- New Holt Lodge Farm, Grade II Listed, 0.94km northwest;
- Cornish Hall, Grade II Listed 1.65km north;
- Chapel House Farm House, Grade II Listed, 1.28km east;
- Church of St Paul, Grade II Listed, 1.48km east;
- Plough Inn PH, Grade II Listed, 1.55km east; and
- Cobham Cottage, Grade II Listed, 1.68km east.

The nearest Scheduled Monument to the Site is the Sutton Green Round Barrow, which is situated approximately 2.40km to the southeast of the Site.

2.2.4.4 Flood Risk

In terms of Flood Risk, the proposed site is not situated within an area of risk from flooding from rivers or sea (EA Flood Map for Planning). However, there are small areas of the wider site that are at risk of surface water flooding, mostly centred to the north and south of the wider Kellogg's manufacturing site. **Figure 2-5** below shows the surface area flood risk.

Figure 2-7: Surface Water Flood Risk



As the Site is already set within an industrial context, there are already pre-existing surface water drainage systems on the Site that the proposal will utilise; as such, there will be no change in the surface water drainage at the site.

It is also not considered that the proposed temporary buildings will result in an increased flood risk on the Site.

2.2.4.5 Public Rights of Way (PRoW)

There are no Public Rights of Way (PRoW) dissecting or directly bounding the Site; there is a PRoW (ISY/6) to the northeast of the Wrexham Industrial Estate, which connects Ridley Wood Road to Francis' Lane.

To the east, lies another PRoW (ISY/18) which connects Bryn Lane to the B5130. Neither of the PRoW are likely to be negatively impacted by the proposed development, given the pre-existing industrial nature of where the Site is set.

2.3 Planning History

Wrexham County Borough Council's online planning portal[1] provides access to all planning applications related to the Site. **Table 2-1** below details the planning applications associated with the Site.

Table 2-1: Planning History

Application Ref.	Description of Development	Decision	Determination Date
P/2023/0869	Discharge of condition 5 (biodiversity) of planning permission p/2023/0666	Granted	16/01/2024

[1] https://www.wrexham.gov.uk/service/search-planning-applications

Application Ref.	Description of Development	Decision	Determination Date
P/2023/0666	Installation of single-storey modular building for occupational health facilities to the workforce.	Granted	17/11/2023
P/2019/0152	Installation of a 20m silmline greenfield pole at the southern end of site with shrouded antennae and 0.3M link transmission dish with cabinets at ground level to house electronic apparatus	Granted	16/05/2019
P/2017/0380	Application for approval of details reserved by conditions imposed under planning permission P/2017/0090 – Conditions 4 and 5	Granted	Unknown
P/2017/0090	Single-storey rear extension to house new chocolate storage tanks (Kelloggs training centre portacabin)	Granted	11/04/2017
P/2017/0588	Introduction of 3 no. Air handling/air cleaning units on to the existing flat roof area of the building (emission points/flues extend upwards to 16m above ground floor level - 8m above respective roof level)	Granted	16/08/2017
P/2013/0248	Removal of Condition 1 of Planning Permission P/2008/0936 to allow the permanent retention of storage facility building	Granted	20/05/2013
2011/0573	Construction of new raised access walkway and canteen block Infill of existing 2-storey modular office block Construction of extended fully enclosed goods in canopy Installation of new chocolate tank and new enclosure	Granted	07/09/2011
P/2010/0811	Erection Of Bulk Syrup Storage Building	Granted	30/09/2010
P/2008/0936	Retention and continued use of temporary storage facility (previously granted under code no. P/2004/0982).	Granted	13/10/2008
2005/0112	Portable Foods Offices and Facilities Accommodation/ Upgrade.	Granted	19/04/2006
2005/1441	Silo Block Building	Granted	19/12/2005
2005/0112	Relocation of existing workshop and erection of 2 storey office complex	Granted	19/04/2005
P/2004/0982	Retention and continued use of temporary storage facility (previously granted under code no. P/2001/10/11)	Granted	26/08/2004
2004/0366	4 temporary Portakabins	Granted	22/03/2004
2004/0116	Installation of Goods/ Persons Lift and Lift Shaft – N.W. Exterior of Building (P.Fds.).	Granted	04/02/2004
P/2001/1011	Erection of temporary storage facility	Granted	23/10/2001
2001/0147	New Vehicle Entrance	Granted	22/10/2001
2000/1057	New Chiller Building (P.Fds.)	Granted	20/11/2000

Application Ref.	Description of Development	Decision	Determination Date
2000/0119	Buhler Room and Penthouse - 4th Process Roof	Granted	15/02/2000
2525	Tank Storage Facility (P.Fds.)	Granted	12/10/1998
2086	Erection of Temporary Toilet Block & Quick Break Area (3-year period)	Granted	09/06/1998
1580	Installation of Two Loading Doors and Canopy to Rear elevation (P.Fds.)	Granted	10/11/1997
21718	Extension to Existing Car Park	Granted	07/10/1993
14173	Relocation of previously approved Chimney adjacent to Boiler House	Granted	22/06/1987
14124	Extension to Existing High Voltage Substation	Granted	15/06/1987
13710	Extension to Cereal Manufacturing Facility Including Ancillary Plant & some Equipment Relocations	Granted	09/02/1987
13460	Relocation 2 Sugar Silos & Spent Grains Hopper plus Relocation of Contractors Office & Car Park	Granted	10/11/1986
12560	Extension to Flavour Penthouse	Granted	07/01/1986
12124	Extension to Effluent Treatment Plant	Granted	17/06/1985
11615	Extension to Admin. Building & Provision of Additional Car Parking	Granted	14/02/1985
11156	Erection of New North Plant Penthouse	Granted	03/08/1984
11056	Erection of Additional Water Dosing Building & Cooling Tower & Pumps	Granted	04/07/1984
10988	Amendment to Ref 10148 - Warehouse & Marshalling Building	Granted	25/05/84
10913	Erection of Penthouse on Existing Roof	Granted	23/05/1984
10722	Erection of Water Dosing Building & Cooling Tower & Pumps	Granted	10/03/1984
10351	Two New Penthouses & Cyclone Platforms on Existing Roof	Granted	29/11/1983
10148	Warehouse and Marshalling Building	Granted	27/07/1983
9548	Two Storey Extension to Packing Store and Single Storey Extension to Boiler House	Granted	03/03/1983
9376	Erection of Bulk Vehicle Sampling Bay	Granted	11/11/1982
4576	Erection of Three Palm Oil Tanks	Granted	25/10/1978
1264/5	Water Meter House and Chimney	Granted	21/04/1977
1264/4	Relocation of Oil Tank	Granted	06/09/1976
1264/3	Landscaping & Fencing	Granted	30/07/1976
1264/2	Water Tank & Pump House, Oil Storage Tanks, Bund Pipes & Gantry	Granted	16/06/1976

Application Ref.	Description of Development	Decision	Determination Date
1949	Gatehouse, Factory Entrance Layout, Weighbridge, Gas Meter & Govnr. House, Waste Storage Building	Granted	23/02/1976
1264/1	Minor Amendments to Erection of Factory (Ref 1264)	Granted	19/12/1975
1628	Erection of New Substation	Granted	20/11/1975
1264	Erection of New Factory to Manufacture Cereal Foods and Formation of New Access	Granted	26/06/1975
360	Erection of Factory for Production of Cereals, and Formation of New Access	Granted	08/08/1974

3.0 Proposed Development

This section of the PDAS aims to describe the proposed development at Kellogg's Wrexham manufacturing site, situated at Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT.

3.1 Description of Development

The proposed full application seeks consent for the following:

> *"Proposed installation of temporary storage, welfare and office facilities (Areas 1 & 3) for a period of 24 months (2 years) and associated works"*

The proposed development will comprise four temporary pre-fabricated containerised units across three separate areas of the site. Further information regarding these two areas is provided below.

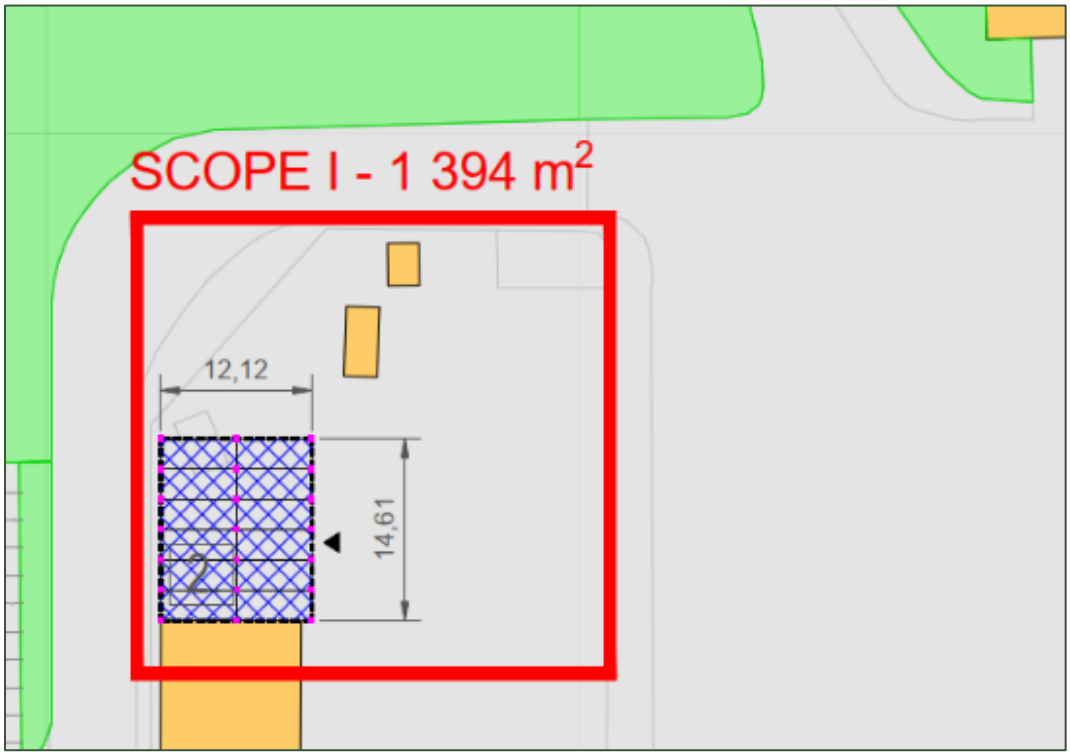
3.2 Area One

Area One, which is located to the northwest of the existing factory building, will comprise a singular temporary structure for use as a Project Contractors Workshop (Temporary Building #2). The structure will be one storey in height and comprise of 12 containerised units. This provides maximum dimensions of 2.6m in height, 12.12m deep and 14.61m wide; equating to a footprint of 177m^2.

The structure is proposed to be used for the storage of materials and tools, and also provide an open area for minor fabrication works associated with the wider project works proposed at the site (i.e. the installation of new production lines etc.).

Figure 3-1 below shows the proposed site layout for Area One, the full drawing is attached to this application as drawing no. BPUK-124-C-501-A-LAY-0015-00.

Figure 3-1: Proposed Site Layout – Area One



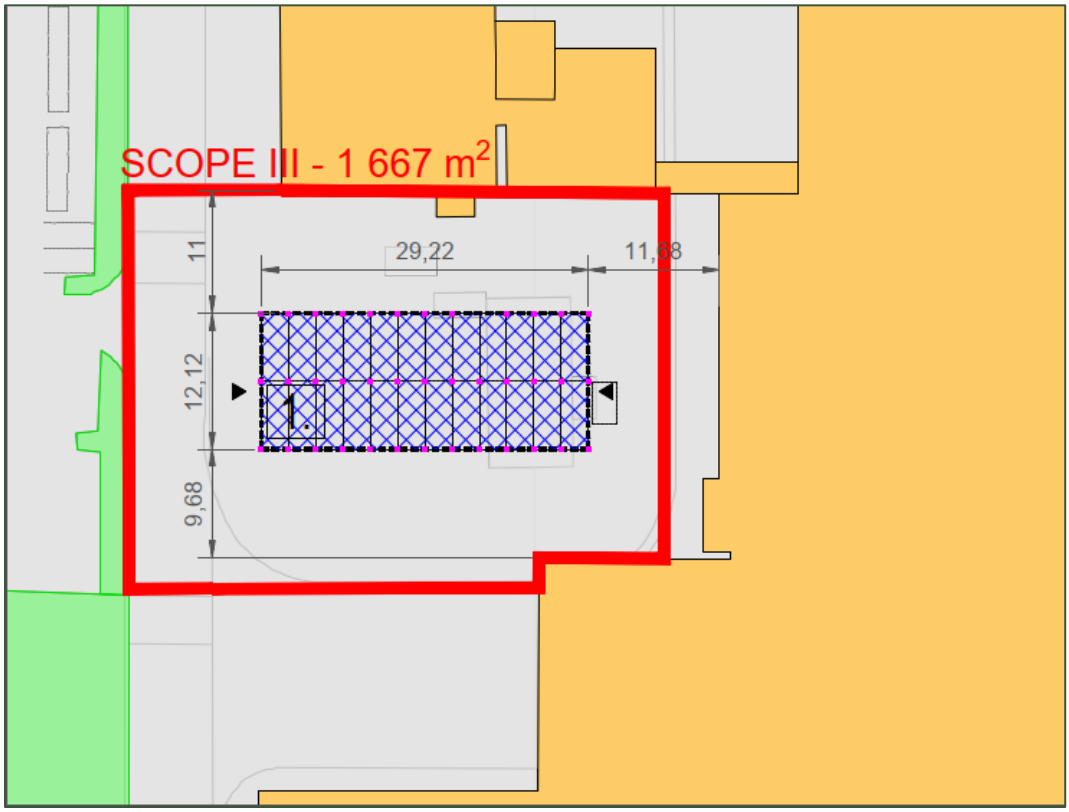
3.3 Area Three

Area Three will comprise of a singular temporary structure utilised for offices (Temporary Building #1). The proposed temporary office building will be two storeys in height, comprising 24 containerised units per floor. This provides maximum dimensions of 5.2m in height, 12.12m deep and 17.05m wide; equating to a footprint of 355m^2.

This office building will be utilised by the on-site Project Management Team and Client Team (namely Blue Projects and Kellanova). The office building will comprise workspaces, meeting rooms, changing rooms, toilets, and a small canteen. Again, the upper floors would be accessible via cantilevered metal stairs attached to either end of the structure (please see Figure 4-1 below for an example image).

Figure 3-1 below shows the proposed site layout of Area Three, the full drawing is attached to this application as drawing no. BPUK-124-C-501-A-LAY-0016-00.

Figure 2-8: Proposed Site Layout – Area Three



3.4 Foul Sewer Connection & Surface Water Drainage

Given that a number of the units contain either toilet or kitchen facilities, it will be necessary to make temporary connections to the onsite foul sewers which run under the circular internal access road. A set of drainage plans have been submitted in support of the application.

Given that the proposed temporary units are to be located on areas of existing hardstanding, no additional surface water drainage provision needs to be made at the site. All surface water would continue to fall onto the existing hardstanding areas and would utilise the existing drainage network on site; there would be no increase in surface water drainage runoff from the site.

3.5 Parking

Staff and third-party contractors will park within existing designated parking areas. There is sufficient parking within the wider site area that this will not impact the day-to-day operations of the site

3.6 Waste and Other

Again, there are sufficient existing waste and recycling facilities within the wider application site area and additional provision does not need to be made as part of this application. Furthermore, all existing ad-hoc facilities such as designated smoking areas or cycle storage can also be utilised by staff and third-party contractors and no additional provision need be made.

4.0 Design and Access

4.1 Design

All of the temporary structures on Site will be provided by Algeco Co. a third-party supplier dedicated to such temporary facilities. All the temporary structures will be uniform in design and in keeping with the wider appearance of the Kellogg's manufacturing facility and other permanent structures on Site (namely the pre-consented modular structures granted under application P/2023/0666).

Example images have been provided by the Client to aid visualisation of the proposed temporary structures.

4.1.1 Temporary Structure – Outside

As shown in the image below, the temporary structures will all be made of stacked containers, these containers will be grey and in keeping with the pre-existing buildings already on-site.

Figure 4-1: Temporary Structures – Outside



Figure 4-2: Temporary Structures – Outside



4.1.2 Temporary Structures – Inside

The following images depict the likely design of the proposed temporary structures, as stated above these will largely be in-keeping to current buildings on Site.

Figure 4-3: Bathroom and Changing Facilities





Figure 4-4: Office



4.2 Access

4.2.1 Existing Access

Access to the Site as a whole is via Bryn Lane, the Site entrance is situated to the southeast. There is an internal road that encircles the central factory building, this road will provide access to the temporary buildings.

4.2.2 Offices

The proposed office units will be used by approximately 250 no. of staff members, this includes the Client team, project management team, and contractors.

The proposed office units will be in use during the working hours of 07:00 – 19:00, from Monday to Saturday. On occasion when production is not taking place, additional construction works may take place beyond these hours and on Sundays.

4.2.3 Storage Areas and Workshops

The storage areas and workshops will all be used during the working hours of 07:00 – 19:00, Monday to Saturday.

4.2.4 Vehicular Access

The application does not propose any alterations to the existing site access or the internal roads on Site.

4.2.5 Inclusive Access

The proposed development will not impact the current access to the Site nor any existing access arrangements for those with physical impairments or disabilities.

Notwithstanding, the proposed temporary units themselves will only be accessible at the upper floor level by way of exterior metal staircases which are not accessible by those in a wheelchair.

4.2.6 Emergency Access

As the existing site access can comfortably accommodate large delivery vehicles, it will be suitable for access by all forms of emergency vehicles should there be a requirement for them to attend the site.

5.0 Planning Policy Context

This section of the PDAS describes the relevant planning policy framework associated with the proposal. This section provides a review of the statutory development plan and key planning policies at a national and local level.

5.1 National Policy

5.1.1 Planning Policy Wales, Edition 12 (PPW) (2024)

Edition 12 of Planning Policy Wales (PPW) was issued in February 2024 and sets out the relevant land use planning policies of the Welsh Government.

The central objective of the PPW is to ensure that the planning system contributes to the delivery of sustainable development, improves the social, economic, environmental, and cultural well-being of Wales, as per the Planning (Wales) Act 2015, the well-being of future generations (Wales) Act 2015 and other key legislation.

The PPW is separated into subject areas and chapters. The following topics are considered to be of relevance to the proposed development.

- Section 3 – Strategic and Spatial Choices; and
- Section 5 – Productive and Enterprising Places

5.1.1.1 Section 3 – Strategic and Spatial Choices

Paragraphs 3.61 – 3.63 discuss supporting infrastructure, this section highlights the importance of providing adequate and efficient infrastructure within Wales. It is stated within paragraph 3.62 that *'Planning authorities should, in conjunction with key providers, take a strategic and long term approach towards the provision of infrastructure as part of plan making*'.

Paragraph 3.63 goes on to state that *'development should be located so that it can be well serviced by existing or planned infrastructure'*. The proposal is to be based within the Wrexham Industrial Estate, within the Kellanova site which is a pre-established manufacturing site.

Overall, it is considered that the proposed development would result in a positive impact on the Welsh economy, the proposal, while temporary, will allow for the expansion of a key manufacturer within Wales.

The proposed temporary structures themselves will also be of high quality and will be in keeping with the surrounding industrial setting.

5.1.1.2 Section 4 – Active and Social Places

Section 4 of the PPW refers to Active and Social Places, these places are described as those *'which promote our social, economic, environmental, and cultural well*-being'. In regard to the proposed development, the topic of retail and commercial development would be of relevance.

Section 4.3 refers to retail and commercial development, it highlights within paragraph 4.3.1 that *'retail and commercial centres are hubs of social and economic activity and the focal point for a diverse range of services which support the needs of local communities'*.

Overall, it is considered that the work at the wider Kelloggs Site is vital in terms of providing for the local economy and establishing Wrexham as a key hub for manufacturing within

Wales. Therefore, the proposed development is considered a vital player in elevating the current manufacturing on-site.

5.1.1.3 Section 5 – Productive and Enterprising Places

Section 5 of the PPW covers productive and enterprising places, this covers the economic components of placemaking within Wales.

In reference to the economy, the PPW states that '*a prosperous Wales can be achieved through increased economic activity across all sectors at all scales*'.

Section 5.1 refers to economic infrastructure, stating that '*infrastructure … plays a pivotal role in maintaining the economic well-being of Wales*', the section goes on to state that '*poor infrastructure can be both a disincentive to investment and growth, and have a detrimental impact on quality of life, prosperity, and the well-being of communities*'.

Section 5.4 refers to economic development, this section of the PPW highlights that the Welsh Government '*seeks to maximise opportunities to strengthen the foundational economy*' and that '*the planning system should be supportive of this aim*'.

The proposed development will aid in the expansion of infrastructure within Wrexham and Wales, this aligns with the economic vision that is set out in the PPW.

5.1.1.4 Section 6 – Distinctive and Natural Places

Section 6 of the PPW refers to Distinctive and Natural Places, stating that *'The characteristics and environmental qualities of places vary across Wales, creating distinctive or unique features associated with their particular natural or cultural heritage and these should be recognised and valued, in and of, themselves and should be protected and enhanced'*.

Section 6.2 of the PPW refers to green infrastructure, within this section, the value of green infrastructure is highlighted with paragraph 6.2.3 stating that *'the components of green infrastructure, by improving the resilience of ecosystems, can result in positive benefits to well-being including flood management, water purification, improved air quality, reduced noise pollution and local climate moderation, climate change mitigation and food production'.*

Overall, the proposed development is unlikely to result in a significant impact on any green infrastructure that is present on the Site due to the proposal's temporary nature.

Further to this Sections 6.3 (Landscape), 6.4 (Biodiversity and Ecological Networks), and 66 (Water and Flood Risk) have also been reviewed.

Overall, it is considered unlikely that the proposed development would have a significant impact on any of the highlighted topics, this is both due to the temporary nature of the development and also because the proposed development is due to be on a pre-established industrial area.

5.2 Local Policy

5.2.1 Wrexham Local Development Plan 2 (LDP2) 2013 to 2028

The Wrexham Local Development Plan was adopted in December 2023 and replaced the Wrexham Unitary Development Plan, it covers the plan period of 203 to 2028 and forms part of the Statutory Development Plan.

The following policies are of relevance to the Site:

- Policy SP2: Location of Development;

- Policy SP6: Green Wedge;
- Policy SP8: Economic Growth, Employment, and Enterprise;
- Policy SP9: Wrexham Industrial Estate;
- Policy EM1: Protection of Existing Employment Land;
- Policy EM2: Provision of Supporting Facilities for Employment in Business, Industrial and Warehousing Development; and
- Policy EN2: Local Designations for Nature Conservation and Geological Importance.

5.2.1.1 Policy SP2: Location of Development

Policy SP2 refers to the location of development, it states that 'new development [should be] directed to the defined settlement limits and employment areas as identified on the Proposals Map'.

Referring to the Proposals Map, the Wrexham Industrial Estate is highlighted as a key strategic site, under Policy SP9. Paragraph 3.25 states that *'directing development to these key areas makes the best use of existing infrastructure and services'*.

Overall, it is considered that these temporary structures are vital to the future of the wider Kellogg's Site as they will aid in the expansion and longevity of the company at their Wrexham location.

The expansion of the manufacturing line will likely result in further employment opportunities for local people in the surrounding area, while also solidifying Wrexham and Wales as a key food manufacturer within the UK.

5.2.1.2 Policy SP6: Green Wedge

Policy SP6 refers to areas within Wrexham that have been designated as Green Wedges to ensure the protection and openness of land.

There is a green wedge situated to the west of the Wrexham Industrial Estate. Due to the temporary nature of the proposal and that the proposed offices will not encroach on the wedge it is considered that the proposal is unlikely to result in negative impact.

5.2.1.3 Policy SP8: Economic Growth, Employment, and Enterprise

Policy SP8 supports the expansion and growth of Wrexham regarding employment and enterprise, the policy aims to ensure that Wrexham continues to be '*a key economic driver in North Wales and the wider region'*.

Paragraph 3.59 goes on to state that 'one of the objectives of the Plan 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'.

Overall, it is considered that the proposal will accord with Policy SP8, this is because the proposed development is intended to aid in the internal construction works that are due to take place to expand the manufacturing line already located on Site.

Kellanova is a global brand, and allowing for the expansion of its production line within Wrexham provides a great opportunity for economic growth, solidifying Wrexham's place as a key employer within North Wales.

This also aligns with national policy, which designated Wrexham as a National Growth Area.

5.2.1.4 Policy SP9: Wrexham Industrial Estate

Policy SP9 refers to Wrexham Industrial Estate (WIE), which has been designated as the County's Key Business Sector Area as per the Plan's proposal map. Policy SP9 states that WIE will be the *'primary focus over the plan period for class B1, B2, and D8 employment'*.

Paragraph 3.66 goes on to state that the purpose of Policy SP9 is to 'set out the importance of WIE on a local and regional basis and to ensure its protection and promotion as the County Borough's Key Business Section area'.

Overall, it is considered that the proposal aligns with this policy. The proposal will aid in the vital expansion of Kellanova's manufacturing line allowing for further employment opportunities with the WIE, which this Policy supports.

5.2.1.5 Policy EM1: Protection of Existing Employment Land

Policy EM1 highlights the County Borough's aim to ensure that existing employment areas are protected from non-employment-related land uses. The policy highlights Wrexham Industrial Estate as a key protected employment area, to be used for B1, B2 and B8 use classes.

The proposal aims to aid in the construction of vital expansion works to Kellanova's manufacturing lines, this is likely to result in

5.2.1.6 Policy EM2: Provision of Supporting Facilities for Employees in Business, Industrial, and Warehousing Developments

Policy EM2 allows for the provision of open space, public realm, leisure, food and drink, and childcare facilities should they be appropriate within the context of the pre-existing employment areas.

It is considered that the proposed temporary structures will be of an appropriate nature and scale and will be used to provide essential supporting facilities for the internal construction work.

5.2.1.7 Policy NE2: Local Designations for Nature Conservation and Geological Importance

Policy NE2 refers to local designations relating to nature conservation and geological importance, it states that developments can only be permitted if they do not adversely impact the locally designated sites, habitats and species.

While there is a designated area situated to the south of the Site, it is overall not considered that the proposed development would impact the local designation.

6.0 Material Considerations

6.1 Water Environment

As stated previously, given their location on existing areas of hardstanding, the proposed temporary structures will not result in a significant increase in the risk of flooding to the Site from surface water. The proposed temporary structures will utilise the current drainage already in use at the Site.

Furthermore, the areas within which these units are to be located are identified as falling within Flood Zone 1. As the total area of the proposed site does not total 1ha and the Site is also not situated within an area of high flood risk, a Flood Consequences Assessment is not required to support the application.

6.2 Ecology

The proposed temporary structures will not result in a negative impact on any areas of habitat on site, nor will they impact any known protected species in proximity to the application site.

6.3 Noise

The proposed temporary structures, whilst supporting the implementation of other works at the site, would not raise any new sources of noise beyond those already experienced through the day-to-day operations of the site. The temporary structures and the uses contained therein will comply with the noise limitation already imposed on site through previous permissions at the site.

A separate application will be submitted in due course regarding any new or replacement plant and/or machinery to be accommodated on the roof of the main building. This will be supported by an appropriate noise impact assessment.

6.4 Air Quality

The proposed temporary structures, whilst supporting the implementation of other works at the site, would not raise any new sources of air quality beyond those already experienced through the day-to-day operations of the site.

A separate application will be submitted in due course regarding any new or replacement plant and/or machinery to be accommodated on the roof of the main building. This will be supported by an appropriate air quality assessment

6.5 Transport

The proposed temporary units will not create significant levels of additional traffic beyond that already consented on site. Indeed, given that the proposed internal works could be undertaken without consent, any associated traffic movements arising from the project team and third-party contractors would occur even if permission for the temporary units was not sought.

Furthermore, staff and third-party contractors will park within existing designated parking areas within the wider Kellogg's site. There is sufficient parking within the wider site area that this will not impact the day-to-day operations of the site

7.0 Summary and Conclusions

7.1 Summary

This Planning Design and Access Statement (PDAS) has been prepared by SLR Consulting Limited (SLR) on behalf of Kellanova ('the Client') to support the full planning application for:

> *"Proposed installation of temporary storage, welfare and office facilities (Area 1 & 3) for a period of 24 months (2 years) and associated works"*

This PDAS, which supports the application, has provided a thorough overview of the proposed development, including an analysis of relevant planning policy, and an analysis of the potential environmental effects.

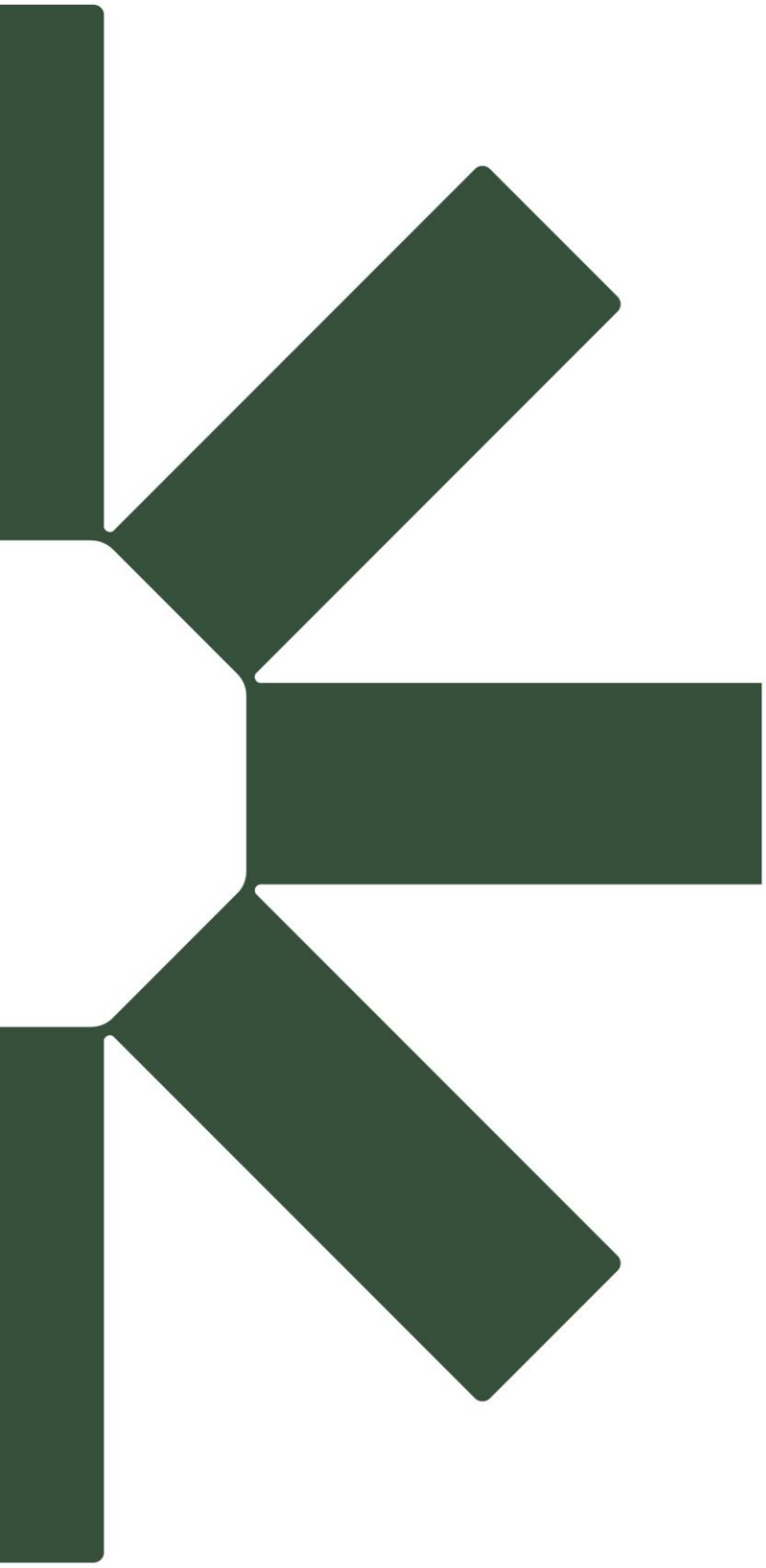
It is our view that on the basis of the points provided within this document, Wrexham County Borough Council should grant permission for this application and continue to support the continued success of Kellogg's food manufacturing facility within Wrexham Industrial Estate.

7.2 Conclusion

The proposed development would comply with the current national and local planning policy relevant to the consideration of this application. As such, the content of this PDAS clearly indicates that the site is entirely suitable for the proposed development.

On this basis, it contended that there are no other material considerations and that the planning balance lays in favour of planning permission being granted.

We trust this document has provided sufficient information to allow for a positive determination of the application.



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