Land off Davy Way, Llay Industrial Estate

Planning Statement

RA & CE Platt Ltd

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1.0 Introduction and Background

1.1 This Planning Statement [Statement] has been prepared by Nathaniel Lichfield & Partners [Lichfields] on behalf of RA & CE Platt Ltd [Platt] to assist Wrexham County Borough Council [the Council] in its consideration of an outline planning application for industrial development at Land off Davy Way located within Llay Industrial Estate, Llay [the Site].

1.2 The Site comprises a currently undeveloped 3.29 hectare [ha] parcel of land within the existing industrial estate. Platt is seeking outline planning permission with all matters reserved for an industrial development (Use Class B1(c) Light Industrial, B2 General Industry and / or B8 Storage or Distribution).

1.3 The purpose of this Statement is to assist the Council and the consultees in its consideration of the application and, having regard to Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, to demonstrate the conformity of the proposals with the development plan, relevant national policy, as well as any material considerations.

The Structure of the Statement

1.4 The following sections of this Statement are structured as follows:

1 Section 2.0 describes the application site and its surroundings, alongside any relevant planning history;

2 Section 3.0 sets out the development proposals;

3 Section 4.0 outlines the relevant planning policy framework for the determination of the application;

4 Section 5.0 provides an assessment of the planning considerations relevant to the proposals and sets out how the proposals conform with the development plan; and,

5 Section 6.0 concludes the Statement by detailing how the scheme constitutes sustainable development and consequently should be approved by the Local Planning Authority [LPA].

2.0 Site Description and Background

Site Location

2.1 The Site is located in the north of the settlement of Llay, at the north-eastern edge of Llay Industrial Estate. The Site is within the administrative boundary of the Council and is situated approximately 4.7 miles north of Wrexham and approximately 1 mile north-west of Llay.

2.2 The vast majority of the urban settlement of Llay is situated south of the Site. The immediate surrounding area comprises existing employment and commercial uses located north of the B5102 Llay Road and west of the B5373 Rackery Lane. Residential uses are predominantly located beyond the industrial estate to the south and existing countryside is situated to the north, east and west.

2.3 The Site is located within close proximity to bus stops located on Davy Way, situated adjacent to the Site's north-western corner, and Rackery Lane, located within approximately 330m of the Site. The stops offer services to Southsea, Gatewen, Caego and Wrexham. The nearest train stations to the Site are Caergwrle station, situated approximately 2.7km north-west of the Site, and Cefyn-y-Bedd, situated approximately 3.2km west of the Site. Both stations offer services operated by Transport for Wales between Bidston and Wrexham.

2.4 The Site is situated approximately 750m north-west of the B5102 Llay Road that connects to the A541 Wrexham Road to the east and the A483 to the west that connects Chester with Wrexham.

2.5 A Site Location Plan (ref. 13361-AEW-SI-XX-DR-A-0501 rev P4) is provided with this application, which identifies the exact location and extent of the Site.

Site Description

2.6 The Site comprises Land at Davy Way situated within Llay Industrial Estate. The Site is rectangular in shape and comprises vacant undeveloped greenfield land. The Site contains intermittent vegetation, semi-improved grassland and shrubbery. Scattered trees and hedgerows are located along the Site's boundaries, with a linear row of trees running north-east to south-west through part of the Site.

2.7 Two ponds are located on the Site. One pond is situated in a central location adjacent to the Site's southern boundary, with a further ephemeral pond located in the Site's north-eastern corner adjacent to the junction of Rackery Lane and Davy Way. This pond is largely dry and very shallow (i.e. during summer is largely indiscernible) and is only understood to collect water during substantive rain events.

2.8 The Site is bound:

- To the north-east by the B5373 Rackery Lane, beyond which is agricultural fields;
- To the south by existing industrial units within Llay Industrial Estate;
- To the south-west by the car parking associated with North Wales Police's office and an undeveloped parcel of land comprising trees and grassland; and,

- To the north-west by Davy Way, beyond which are two industrial units located on Llay Industrial Estate.

Site Constraints

2.9 The Site does not contain any statutory or locally designated heritage assets, nor does it contain any scheduled ancient monuments. The Site is not located within or adjacent to a Conservation Area. The nearest listed building is the Grade II Listed Rackery Hall (including attached forecourt walls), situated approximately 450m north-west of the Site.

2.10 The Development Advice Map [DAM] that accompanies Technical Advice Note 15 Development and Flood Risk [TAN15] confirms that the Site is located within Zone A, considered to be at little or no risk of fluvial or tidal/coastal flooding. A drainage ditch is located adjacent to the south-western boundary of the Site.

2.11 In terms of topography, the Site slopes gently from north to south.

2.12 The Site is located within the River Dee and Bala Lake Special Area of Conservation [SAC], identified as a nutrient sensitive catchment by Natural Resources Wales [NWR]. There are also three statutory nature conservation sites within 2km of the Site, two designated as Sites of Special Scientific Interest [SSSI] and one designated as a Local Nature Reserve [LNR]. The nearest SSSI, Llay Bog, is located approximately 1.2km south-west of the Site.

Planning History

2.13 There is no recent planning history of relevance on the Site. However, a number of planning permissions have been granted for employment uses elsewhere on Llay Industrial Estate. A summary is provided below.

Site of the Former Sharp Precision Warehouse, Davy Way

2.14 A detailed planning application (ref. P/2015/0583) was submitted on 27th July 2015 on the former Sharp factory site and adjoining land within the Llay Industrial Estate, adjacent to the Site's south-western boundary for:

"Demolition of existing portal frame warehouse and re-development to provide police office, storage, custody building with ancillary parking and new access from Davy Way"

2.15 The application sought the construction of an out-of-town Eastern Command and Custody Facility for the Police and Crime Commissioner of North Wales. Planning permission was granted on 17th December 2015.

Site on Miners Road, Llay Industrial Estate

2.16 A detailed planning application (ref. P/2014/0298) was submitted on 1st May 2014 by Platt on Land on Miners Road within Llay Industrial Estate, Llay. The land parcel is located approximate 500m south-west of the Site. The application sought the following:

"Erection of industrial buildings (ancillary offices, reception facilities, storage and drivers unit)"

2.17 The application sought approval for new industrial buildings to include offices, a unit to house drivers facilities and a storage area to replace the existing portacabins on the Site. The application was approved on 30th June 2014.

3.0 Development Proposals

3.1 This application seeks outline planning permission for up to 11,613 sqm (up to 125,000 sq ft) of industrial development (Use Class B1(c), B2 and / or B8) based on gross external floorspace on the Site (to include ancillary office accommodation), with all matters reserved for future consideration.

3.2 The application is accompanied by a parameters plan that demonstrates the broad areas of the Site where development could come forward on; the locations of landscaping to deliver suitable landscape buffers, corridors and ecological mitigation; as well as the two potential points of access along the north-eastern boundary of the Site adjacent to Davy Way. The parameters plan fixes the maximum developable area on the Site, the maximum quantum of development that can be accommodated within the developable area and the maximum height of industrial buildings to be delivered on the Site (up to 20 metres above finished floor level [AFFL]).

3.3 The parameters plan shows two points of access into the Site from Davy Way where vehicular access could come forward at reserved matters stage. The two access point options are located between the existing gaps in the tree belt that runs north-east to south-west through part of the Site.

3.4 At this stage it is necessary to retain a level of flexibility in terms of the development layout, which will be dependent on the future occupier/s of the Site and subject to reserved matters approval. However, the application is accompanied by two illustrative layout plans prepared by AEW Architects (refs. 13361-AEW-XX-XX-DR-A-0503 rev P2 and 13361-AEW-XX-XX-DR-A-0504 rev P2) that demonstrate how industrial development could be accommodated on the Site. It is anticipated that the development would comprise either a single industrial building of up to 11,613 sqm (125,000 sq ft) or a combination of smaller buildings of varying sizes up to that maximum floorspace. The development is also likely to incorporate ancillary office accommodation

3.5 As such, one illustrative layout plan (ref. 13361-AEW-XX-XX-DR-A-0504 rev P2) highlights the provision of four industrial buildings comprising a total of seven individual premises utilising a central vehicular access point from Davy Way into the Site.

3.6 The second illustrative layout plan (ref. 13361-AEW-XX-XX-DR-A-0503 rev P2) shows one large industrial premises situated along the south-eastern boundary of the Site. Vehicular access is shown further west along Davy Way.

3.7 The illustrative layouts incorporate a curved internal vehicular arrangement to provide access to the industrial buildings. The layout plans also demonstrate how parking provision (to include disabled parking and parking for HGVs) could be accommodated on the Site.

3.8 The illustrative layouts also incorporate a series of open attenuation and ecological mitigation ponds situated parallel to Davy Way to provide drainage and ecological functions. Landscape corridors are shown along each of the Site's boundaries, with a large area of new and improved tree and landscape planting shown in the northern part of the Site.

4.0 Planning Policy Context

Introduction

4.1 This section of the Statement details the planning policy context for the application and describes the development plan policies relevant to the consideration of the proposal. It also provides an account of the prevailing national policy guidance and other adopted documents that represent appropriate material considerations.

Local Planning Policy

4.2 The adopted development plan for Wrexham comprises:

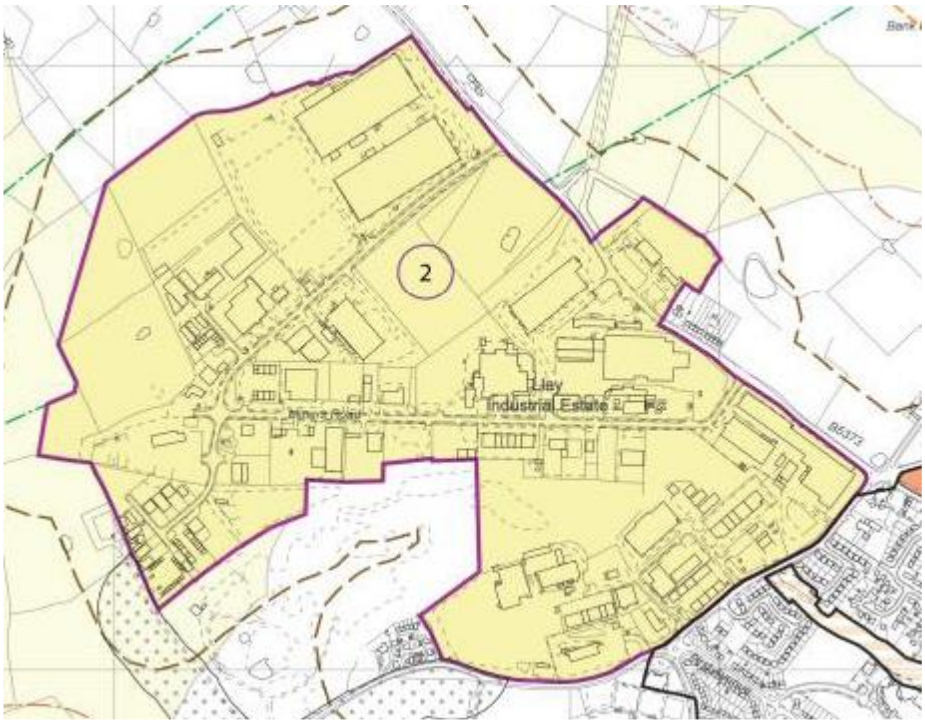
- Wrexham Local Development Plan [LDP] (adopted December 2023); and,
- Adopted Proposals Map.

Wrexham Local Development Plan 2013-2028

4.3 The Wrexham LDP was adopted by the Council on 20th December 2023 and provides the planning framework for future development between 2013 and 2028.

4.4 As identified on the Proposals Map that accompanies the LDP (Figure 4.1), the Site is part of the wider Llay Industrial Estate, which is recognised as an existing employment area. The Site is not specifically identified as a site allocation (as it was in the previous Local Plan). It does however form part of the Council's identified supply of employment land.

Figure 4.1 Wrexham LDP Adopted Proposals Map



Source: Wrexham County Borough Council

4.5 The LDP contains a number of policies which are particularly pertinent to this application.

- **Policy SP8 (Economic Growth, Employment and Enterprise)** seeks to diversify the local economy and widen the economic base by ensuring an overall provision of 96.73ha of employment land within the County Borough.
- **Policy SP11 (Transport and Accessibility)** states that Wrexham's transport network will be developed in a safe, efficient and sustainable manner by restricting development that would have an unacceptable impact on the safe and efficient operation of the transport network; ensuring adequate level of car parking; and promoting increased use of walking and cycling.
- **Policy SP18 (Climate Change)** requires development proposals to seek to mitigate against the effects of climate change and adapt to its impacts by reducing carbon emissions.
- **Policy Sp19 (Green Infrastructure)** requires development to maintain the extent, quality and connectivity of multi-functional green infrastructure on or near a site.
- **Policy EM1 (Protection of Existing Employment Land)** seeks to protect the County Borough's existing employment areas for B Use Class employment generating uses, including the 82.7ha Llay Industrial Estate for B1, B2 and B8 uses.
- **Policy EM2 (Provision of Supporting Facilities for Employees in Business, Industrial and Warehousing Developments)** enables the provision for open space, public realm and leisure facilities subject to it not impacting on the status and character of the employment area; and the facility is of an appropriate size and scale to meet the needs of workers in the vicinity.
- **Policy NE3 (Trees, Woodlands and Hedgerows)** only permits development where it does not cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value. Where adverse effects cannot justifiably be avoided and sustainable integration is not possible then adequate mitigation will be required.
- **Policy NE6 (Waste Water Treatment and River Water Quality)** states that all new development will only be permitted where there is no adverse effect on the integrity of the River Dee and Bala Lake SAC in particular through the treatment of waste water. Development creating waste water discharges will be required to demonstrate there is no increase in phosphorus levels in the SAC.
- **Policy DM1 (Development Management Considerations)** requires development proposals to enhance the character of the site; not unacceptably effect the amenity of nearby occupiers; prioritise walking and cycling; and not give rise to highway or pedestrian safety or parking problems.
- **Policy T1 (Managing Transport Impacts)** seeks to encourage the use of the transport hierarchy to manage traffic impacts arising from development.
- **Policy MW5 (Sustainable Waste Management)** requires proposals to demonstrate how the production of waste will be minimised during all stages of the development.
- **Policy RE1 (Development and Renewable Energy / Low Carbon Technology)** requires major sites to incorporate schemes which generate energy from renewable and low carbon technologies unless not financially or technically viable to do so.

National Planning Policy

National Development Framework

4.6 The Welsh Government published the National Development Framework [NDF] (Future Wales: The National Plan 2040) on 24th February 2021. This is a spatial plan and sets out the direction for development in Wales up to 2040. The NDF addresses housing, energy the economy, transport and the environment at a national scale and seeks to sustain and develop a vibrant economy, achieve climate-resilience, and improve the health and well-being of communities.

4.7 **Policy 1 (Where Wales will grow)** identifies three National Growth Areas for growth in employment and housing opportunities, as well as investment in infrastructure. This includes 'Wrexham and Deeside'.

4.8 **Policy 20 (National Growth Area – Wrexham and Deeside)** states that Wrexham and Deeside will be the main focus for growth and investment in the North region. Strategic and Local Development Plans across the region must recognise the National Growth Area as the focus for strategic economic and housing growth.

Planning Policy Wales

4.9 Planning Policy Wales [PPW] was published in December 2018 and was last updated in February 2024. It sets out the land use planning policies of the Welsh Government. The central objective of PPW is to promote and provide a framework for sustainable development within Wales. Chapters of particular relevance to this application are summarised below.

4.10 **Chapter 2** deals with planning for sustainability. A key planning principle of the PPW is to grow the economy in a sustainable manner by planning for new supporting infrastructure and services and fostering economic activity.

4.11 **Chapter 3** highlights the importance of good design, promoting sustainable means of travel, enhancing local character and promoting legible development, and achieving efficient use and protection of natural resources.

4.12 **Chapter 5** seeks to ensure the creation of productive and enterprising places by providing well-connected employment and sustainable economic development. Where possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration.

4.13 **Chapter 6** seeks to create distinctive and natural places, by protecting, maintaining and enhancing biodiversity, increasing the resilience of ecosystems and the natural environment more generally. Developments are also expected to demonstrate how the Stepwise approach has been achieved to deliver a benefit to biodiversity.

Technical Advice Notes

4.14 PPW is supplemented by a series of Technical Advice Notes [TANS]. TANs of relevance are detailed below, and a brief summary of their content is provided.

- **TAN 5 (Nature conservation and planning)** provides guidance on how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.
- **TAN 10 (Tree preservation orders)** provides local planning authorities with adequate provision where appropriate for the preservation and planting of trees and landscaping. The effect of planning proposals on protected trees is a material planning consideration.
- **TAN 11 (Noise)** provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business.
- **TAN 18 (Transport)** describes how to integrate land use and transport planning and explains how transport impacts should be assessed and mitigated.
- **TAN 23 (Economic development)** provides guidance on the role of land use planning in generating wealth, jobs and income, principally around the B-classes.

Other Material Considerations

4.15 The following Local Planning Guidance Notes [LPGN] documents are also of relevance to the proposals:

- LPGN 17 (Landscape and Development);
- LPGN 16 (Parking Standards);
- LPGN 17 (Trees and Development);
- LPGN 26 (Landscape and Industrial Development);
- LPGN 30 (Design); and,
- LPGN 32 (Biodiversity and Development).

5.0 Conformity with Development Plan

Principle of Development

5.1 The proposals seek to deliver an industrial development of B1(c), B2 and / or B8 employment floorspace on an undeveloped part of the existing Llay Industrial Estate, situated within the settlement limits of Llay. As set out in LDP Policy SP2 (Location of Development), new development should be directed to the defined settlement limits and employment areas identified on the Council's Proposals Map. Llay is identified as a Tier 2 Key Settlement, and seeks to protect existing employment areas, including Llay Industrial Estate, which is a designated employment area under LDP Policy EM1 (Protection of Existing Employment Land). The policy protects the 82.7ha site for B1, B2 and B8 uses, and consequently proposals that will deliver B Use Class employment generating uses will be supported by the Council.

5.2 Consequently, the provision of a scheme comprising a mix of B1(c), B2 and / or B8 uses will help to complement and enhance the employment offer on the surrounding Llay Industrial Estate; help to safeguarding the existing industrial estate; and help to support future local and regional economic growth in accordance with LDP Policy SP8 (Economic Growth, Employment and Enterprise). It is therefore considered that the scheme fully accords with all policies at a local level, as well as TAN 23 (Economic Development).

Design and Layout

5.3 As previously mentioned, details of the scheme's layout and appearance will be submitted for future reserved matters approval. However, in accordance with LDP Policy DM1 (Development Management Considerations), two illustrative layout plans accompany the application that demonstrate the potential for the Site to accommodate up to 11,613 sqm (125,000 sq ft) of high-quality employment development.

5.4 The parameters plan (ref. 13361-AEW-SI-XX-DR-A-0502 rev P04) shows the broad location where employment development could come forward on, with the area adjacent to Davy Way in the north-western part of the Site proposed for new and improved landscaping and sustainable urban drainage features. The broad location of landscaping seeks to retain the linear row of trees running north-east to south-east through part of the Site.

5.5 The application is seeking approval for industrial buildings of a maximum height to ridge of 20m AFFL. This height has been driven by market requirements to achieve the internal heights required by an occupier should a single unit of up to 11,613 sqm be delivered on the Site. Consequently, it is considered that the maximum height parameter will provide a suitable degree of flexibility to make most efficient use of this defined employment site in the future. In addition, new and existing trees and hedgerow planting along the Site's boundaries, particularly along Davy Way and Rackery Lane, will provide screening into the development to protect visual amenity.

5.6 The proposed development would make a positive contribution to the established character and identity of the locality. In finalising the scheme's design at reserved matters stage, the broad approach to design quality, illustrated in the accompanying Design and Access Statement prepared by AEW Architects, will be applied.

Highways, Accessibility and Parking

Highways and Access

5.7 LDP Policy DM1 (Development Management Considerations) and Policy T1 (Managing Transport Impacts) require development proposals to incorporate measures to prioritise walking, cycling and public transport use; whilst not giving rise to highway safety, pedestrian safety or parking problems on site. To demonstrate that a scheme will not compromise the safe and efficient use of the highway network, major developments should be accompanied by a Transport Assessment and Travel Plan.

5.8 In accordance with local planning policy, the planning application is accompanied by a Transport Assessment prepared by Mode Transport Planning. The report assesses the sustainability of the Site for use by a variety of transport modes, including walking and cycling. It also considers the impact that the proposed development will have upon the capacity of the surrounding highway network.

5.9 The parameters plan (ref. 13361-AEW-SI-XX-DR-A-0502 rev P04) indicates two potential vehicular access options from Davy Way into the Site to create flexibility in bringing forward one or both access locations at reserved matters stage. Both options will require the delivery of new priority junctions from Davy Way, comprising a 7.3m wide carriageway and 15m kerb radii.

5.10 Based on the existing speed limit of 20mph along Davy Way, visibility splays of 2.4m x 25m can be achieved in both directions within the adopted highway from the two potential access junction locations. Additionally, it has been demonstrated that a 16.5m articulated HGV can enter and exit both access options in forward gear.

5.11 Mode Transport Planning has undertaken a trip generation exercise derived by TRICs. This exercise has been based on the delivery of up to 10,671sqm of gross internal employment floorspace on the Site. It is anticipated that the development will generate up to 78 two-way trips during the AM peak hour and up to 76 two-way trips during the PM peak hour.

5.12 On the basis that the proposed development will result in an increase of 30 or more two-way vehicle movements during the AM or PM peak period, capacity analysis has been undertaken on the Rackery Lane / Chapel Lane / B5102 / B5373. The analysis shows that the scheme is expected to have a negligible impact on the local highway network, given the relatively low number of development trips when distributed across the network.

Parking

5.13 The LDP requires that an adequate level of parking provision is incorporated into a scheme, with the Council's parking standards, set out in LPGN 16 (Parking Standards), explaining the parking levels that should be applied dependent on the Site's use.

Table 1

Type of Development	Parking Standard	Cycle Parking Standard
B2 General Industry	1 car space per 50sqm gross floor space	1 cycle space per 500sqm gross floor space

Type of Development	Parking Standard	Cycle Parking Standard
B8 Storage and Distribution	1 car space per 100sqm gross floor space	1 cycle space per 1000sqm gross floor space

Source: The Council's LPGN 16

5.14 Final parking arrangements do not form part of this outline application. Notwithstanding this, the accompanying illustrative layout plans demonstrate how parking provision could be accommodated on the Site.

5.15 As shown in ref. 13361-AEW-XX-XX-DR-A-0504 rev P2, a total of 158no. car parking spaces are shown, including 12no. accessible spaces. This equates to 1 space per 64sqm. At this stage, the split between B2 and B8 uses on the Site is unknown and will be dependent on the requirements of the end-operator/s. Based on a 50:50 split between B2 and B8 land uses and to comply with the Council's parking standards, a total of 153 parking spaces would be required on-site. The proposed provision is largely in line with the Council's standards and therefore should be deemed acceptable by the Council.

5.16 However, parking provision will be confirmed at reserved matters stage when end-operators' parking requirements are known.

Pedestrian and Cycling Arrangements

5.17 Footways will be provided within the Site that link to existing footways along Davy Way. This will help to better connect the Site to existing public transport services, including the bus stops on Davy Way situated within 150m of the site access points. Additional services towards the centre of Llay are available from bus stops located on the B5102 Llay Road, accessible via Rackery Lane.

5.18 It is considered that pedestrian access from the site onto Davy Way is sufficient to serve the development. Davy Way connects onto Rackery Lane, which has a pavement on the development side of the road. This provides direct pedestrian connectivity to the local services and facilities located to the south-east. The route via Davy Lane is safe and convenient. As the application is submitted in outline the future internal arrangement and distribution of buildings and their respective access is unknown. It is not therefore considered appropriate to require any other pedestrian access at this time. Furthermore, it is proposed to retain the existing landscape screening along the north-eastern boundary with Rackery Lane to assimilate the development in its wider setting. Any footpath in this location would reduce the effectiveness of this screening. Furthermore, a pedestrian access into the Site from this on Rackery Lane isn't considered necessary to make the development acceptable in planning terms. An access from Rackery Lane would only introduce a very short reduction in walk time to these services in comparison to entering and exiting the Site from Davy Way by foot. Therefore, the proposed access from Davy Way should be accepted by the Local Highways Authority. It should therefore not be a requirement of the outline planning permission. In any event the arrangement of the buildings and yard areas is not known at this stage. Thus, the benefit of such an access remains unknown, and to require such an access will prejudice the flexibility of the future layout of the site.

5.19 The Transport Assessment demonstrates that the centre of Llay is located within a 2km cycle catchment of the Site, further evidencing the Ste's accessibility by a range of sustainable travel modes.

5.20 Additionally, to comply with LDP Policy T1 (Managing Transport Impacts), a Framework Travel Plan [FTP] has been prepared by Mode Transport Planning. The FTP seeks to minimise the number of single occupancy private car trips generated by employees of the development, by encourage the use of more sustainable transport modes. The document sets out the principal strategies that will be put in place once the Site is in occupation for employment use. These include the appointment of a Travel Plan Co-ordinator; providing a Travel Pack to all employees promoting the range of travel options available; and promoting car sharing, amongst other measures.

5.21 The scheme therefore incorporates measures to encourage walking, cycling and public transport use to and from the Site in accordance with LDP Policy DM1 (Development Management Considerations and Policy T1 (Managing Transport Impacts).

Environmental Assets

Noise

5.22 A Noise Impact Assessment has been prepared by E3P in support of this planning application. As part of the assessment, an unattended background and ambient sound survey has been carried out along the eastern boundary of the Site, a location deemed representative of the closest existing residential receptors.

5.23 The survey was carried out between 10am on Thursday 11th April to 7am on Tuesday 15th April 2024 to include a full weekday and weekend time period.

5.24 A 3D noise model has been constructed to determine the impact of noise resulting from the proposed sources of sound from the development. The model has been used to predict the Rating Level at the receptors which has been compared with the lowest typical background sound level, accounting for any acoustic characteristics associated with the sound in accordance with BS 4142:2014+A1:2019.

5.25 The assessment determined that the predicted rating levels would fall well below the existing typical measured background sound level, during daytime and nighttime periods, at all receptors. As such, no adverse impact is predicted, and no mitigation measures are required.

5.26 Overall, no adverse noise impact is expected and consequently, the proposals will safeguard the environment from noise pollution arising from the development in accordance with LDP Policy DM1 (Development Management Considerations).

Ecology

5.27 A Preliminary Ecological Appraisal [PEA] of the Site has been undertaken by E3P. The PEA outlines that there are no statutory designated sites located within 1km of the Site. However, one Local Wildlife Site [LWS] is situated within 1km of the Site, comprising Nant-y-Gaer and Llay Valley LWS located approximately 650m south-east. However, due to the

lack of statutory designated sites and the distance between the Site and the LWS, the proposals are not considered to have any impact on any designated sites.

5.28 The Site comprises other neutral grassland, mixed scrub, other broadleaved woodland, treelines and waterbodies. Three treelines were identified on the Site located along the Site boundaries and separating the two grassland fields.

5.29 Great crested newt [GCN] eDNA surveys were undertaken by Atmos Consulting Ltd on the two waterbodies located on the Site during the 2024 GCN survey season. Waterbody 1 (an ephemeral pond located in the north-eastern part of the Site) was found to be dry during the survey. Waterbody 2 returned negative results for the presence of GCN. Therefore, it is considered that the waterbodies on-site are not GCN breeding waterbodies. To mitigate the loss of the existing waterbodies on the Site, the illustrative layouts show the reprovision of the ponds. It is intended that one of these ponds will provide a replacement of the existing filled pond on the Site to continue to serve an ecological function. It is also intended that the series of open attenuation features shown on the submitted plans will serve both a drainage and ecological function.

5.30 [redacted] possible. However, the habitats on-site were assessed as having suitability for badgers, as well as foraging and commuting bats, nesting birds, common amphibians and reptiles.

5.31 The PEA includes a series of mitigation measures, including recommending that, where possible, the treelines and broadleaved woodland are retained and protected through development; implement a lighting design to ensure sensitive habitats on site are maintained as dark areas during and post-construction; and implementing precautionary working methods for badger and retiles.

Landscaping and Trees

5.32 The application is accompanied by an Arboricultural Impact Assessment [AIA] prepared by Tree Solutions, the purpose of which is to identify the impact of the proposed development on trees within the Site.

5.33 The tree survey identified 18 individual trees (T1-T18), six groups (G1-G6) and two hedgerows (H1-H2). In order to accommodate development on the Site, it will be necessary to remove G2; reduce the northern canopy and remove 10 trees to the north-east of G1; remove T17 and T18; remove a small section of G5 and the G3 trees (if required). However, these trees have been categorised as 'C' grade purely on collective value, and are therefore considered to be of low quality. However, appropriate compensation will be provided as part of the future landscaping proposals for reserved matters approval to mitigate the loss of these trees.

5.34 As shown on the parameters plan and illustrative masterplans, the linear belt of trees is proposed to be retained in such a way as to create an attractive frontage to the industrial development. Overall, the AIA concludes that the long-term future of existing trees has informed the parameters plan for the Site so that the significant arboricultural assets have been retained where possible. As such, the proposals seek to prevent unacceptable harm to trees of significant value in accordance with LDP Policy NE3 (Trees, Woodlands and Hedgerows), the PPW and TAN 10.

5.35 LDP Policy SP19 (Green Infrastructure) requires development to protect the green infrastructure features most valuable for both nature and people; and in instances where loss of green infrastructure is unavoidable, provide mitigation and compensation for the lost assets on a site-specific basis. Furthermore, LDP Policy SP14 (Natural Environment) states that development will only be permitted where it seeks to protect, conserve and enhance the natural environment, including natural landscape features such as trees and hedges. The parameters plan for approval shows the locations of the Site where landscaping is proposed to come forward to provide new and improved green infrastructure, landscape buffers, green corridors and ecological mitigation. Whilst the landscaping details will be approved at reserved matters stage, the scheme will deliver new and improved areas of landscape planting to enhance the site's ecological value.

5.36 Chapter 6 of the PPW (Distinctive and Natural Places) advises that a Stepwise approach should be applied to any trees or hedgerows to be removed. A Green Infrastructure Statement [GIS] has been prepared by E3P that makes a series of green infrastructure recommendations that has informed the creation of the landscaping strategy in accordance with the Stepwise approach to deliver a net benefit to biodiversity on-site. This includes retaining and protecting treelines and the existing woodland in the first instance and like-for-like replacement should any be lost as a result of the development. Additionally, it is envisaged that the area of landscaping at the front of the Site, adjacent to Davy Way, will incorporate a range of native and non-native plant species, grasses and shrubs as well as planted SuDS features within and surrounding the drainage features to collectively deliver biodiversity and drainage benefits. The scheme will be developed to create species diversity whilst enhancing the biodiversity value on-site

5.37 In addition, the GIS includes the recommendations set out in the PEA. For example, it includes measures to prevent harm to common amphibians, badgers and reptiles through the implementation of Precautionary Working Methods to ensure effective mitigation measures are in place in line with the Stepwise Approach.

Flood Risk and Drainage

5.38 LDP Policy DM1 (Development Management Considerations) requires schemes to not increase the risk of flooding but also make adequate provision for sustainably dealing with foul and surface water drainage.

5.39 A Flood Consequences Assessment [FCA] has been prepared by Tier Consult Group [Tier] in support of this application. The FCA has been carried out in accordance with guidance contained in TAN15 (Development and Flood Risk) and associated Development Advice Maps [DAMs].

5.40 The DAM that accompanies TAN15 confirms that the Site is located within Zone A: Considered to be at little or no risk of fluvial or tidal/coastal flooding. This indicates that the justification test is not applicable and there is no need to consider flood risk further. The Flood Map for Planning [FMfP] shows that the Site is located within Flood Zone 1 for flooding from rivers and the sea. However, a small portion of the Site is located within Flood Zone 2 and 3 for flooding from surface water and small watercourses.

5.41 The proposed development is classified as 'less vulnerable' and TAN15 states that 'less vulnerable' uses are appropriate at this location. Furthermore, in accordance with TAN15, the proposals will not increase flood risk elsewhere.

5.42 The flood risk at the Site will be further managed and mitigated using a number of risk management techniques, including the use of Sustainable Urban Drainage Systems [SuDS]. Consequently, the Site's flood risk can be considered to be limited, with a low or very low annual probability of flooding from all sources.

5.43 The two potential vehicular access options into the Site are not located within the floodplain. Therefore, a permanently safe and dry access can be maintained.

5.44 Two indicative drainage layouts have been prepared by Tier to demonstrate that the proposals shown in the two illustrative layout plans for the Site can be suitably drained. The drainage layouts demonstrate how surface water will either drain into the existing sewer system located along Davy Way or to the existing watercourse situated on adjacent land via an outfall location in the southern corner of the Site. SuDS features, such as filter drains and permeable paving, will be incorporated into the surface water drainage proposals to improve water quality prior to discharging to the wider natural surface water drainage network. Additionally, the illustrative layouts also incorporate a series of open attenuation ponds situated parallel to Davy Way that will provide both drainage and ecological functions.

5.45 However, the detailed drainage scheme for the Site is a matter to be determined at the reserved matters stage when the layout is known. We welcome the use of a suitably worded condition to this effect to be attached to the grant of the outline planning permission.

5.46 The proposals are therefore deemed acceptable in relation to flood risk and drainage matters and comply with all material requirements of national planning policy, as well as LDP Policy DM1 (Development Management Considerations).

Nutrient Neutrality

5.47 LDP Policy NE6 (Waste Water Treatment and River Water Quality) requires development creating waste water discharges to demonstrate there is no increase in phosphorus levels in the River Dee and Bala Lake SAC.

5.48 Additionally, in accordance with NRW's advice for proposed developments within River SACs, the development would need to be assessed to determine whether it is likely to have a significant effect on the SAC.

5.49 In terms of phosphates and nutrient neutrality, the existing guidance highlights that the types of development that may be affected include new residential developments and commercial developments where overnight accommodation is provided.

5.50 Whilst the scheme proposes a new commercial development on the Site, no overnight accommodation will be provided and therefore it is not considered that the scheme is impacted by nutrient neutrality restrictions. However, we have given consideration to any possible associated impacts of the scheme on nutrient levels entering the SAC nonetheless.

5.51 Given the scale and location of the development, it is anticipated that almost all employees at the development will be local, either within Wrexham or the immediate surroundings. As

such they are already residents in the locality and the associated discharges are already accounted for in the catchment. The proposals will not give rise to additional discharges compared to the existing situation. It is therefore considered that the scheme will not create an adverse effect on the designated SAC in and around the River Dee.

5.52 In the unlikely event that some of these employees may commute to the development from outside the catchment, any impact on discharge flows will be negligible.

5.53 The Site is also located in an area served by public sewers that drain to the Gresford Waste Water Treatment Works [WwTW]. As highlighted in the pre-application response from the Council, the WwTW has an up to date Environmental Permit. However, in order to conclude that the development is unlikely to have a significant impact on the SAC, Welsh Water will need to confirm that there is capacity to treat additional wastewater from the proposed development within the Environmental Permit limits.

5.54 Tier has consulted Welsh Water, who has provided the written response in the Appendices. Whilst Welsh Water hasn't specifically stated that flows can be accommodated within the Environmental Permit limits, this is implied on the basis that it confirms that flows can be accommodated within the public sewerage system. Additionally, the response confirms that no problems are envisaged with the WwTWs for the treatment of domestic discharges from the Site.

5.55 The scheme should therefore be deemed entirely acceptable with regards to LDP Policy NE6 (Waste Water Treatment and River Water Quality).

Amenity of Surrounding Occupiers

5.56 LDP Policy DM1 (Development Management Considerations) requires development proposals to not have an unacceptable effect on the amenity of occupiers of nearby properties and land.

5.57 The proposals for the employment use of the Site have been designed to complement the range of surrounding employments uses located on the existing Llay Industrial Estate. The application is accompanied by a Noise Impact Assessment, which provides suitable mitigation measures to ensure that any noise implications from the Site's future operations are minimised. Additionally, consideration has been given to support the health and wellbeing for employees of the Site, by incorporating areas of landscaping to encourage dwell time and providing footpaths to promote active lifestyles.

Energy and Sustainability

5.58 LDP Policy SP18 (Climate Change) seeks to mitigate against the effects of climate change by ensuring proposals reduce carbon emissions and promote energy efficiency. Additionally, to accord with Policy RE1 (Development and Renewable Energy/Low Carbon Technology), major development exceeding 1000sqm must incorporate schemes which generate energy from renewable and low carbon technologies unless financially or technically unviable.

5.59 To comply with the adopted LDP, the application is accompanied by a Low Carbon and Renewable Energy Assessment, prepared by Orbis. The development will follow the principles of the energy hierarchy to reduce carbon emissions. This shall include measures for demand reduction by increasing the thermal efficiency of the building envelope and

promoting energy efficiency. The assessment also considers the incorporation of low carbon and renewable technologies for the Site, including incorporating solar photovoltaics. The use of these technologies will be determined at reserved matters stage.

Sustainable Development

5.60 It is considered that the proposed development will comply with the key principles of sustainable development, providing economic, social and environmental benefits in accordance with the PPW.

1 **Economic Role** – The proposed industrial development will result in further investment into Llay Industrial Estate and will contribute to building a strong, responsive and competitive local economy. The economic benefits of the scheme are shown in Appendix 1. In particular, the proposals will generate £11.9m in construction value and contribute an additional £10.9m in Gross Value Added [GVA] annually over the construction period. The scheme will also support the vitality of Llay and the surrounding area through temporary job creation during the construction of the development, including generating 45 construction jobs and an additional 54 jobs in the supply chain. During the operational phase of the development, the scheme will create 212 direct jobs and will increase expenditure in the local economy by £16.5m annually. The scheme will also deliver revenue benefits for the Local Authority, specifically £188,016 annually in business rate revenues.

2 **Social Role** – The development proposals will lead to a number of skilled jobs being created, and it is likely that a wide variety of roles will be provided, offering the potential for training and career progression. The proposals will improve accessibility to employment opportunities, providing employees with the financial capabilities to promote social wellbeing, enhance their quality of life and support the communities in which they reside.

3 **Environmental Role** – The documents submitted in support of this planning application demonstrate that the proposed development will not adversely impact the natural, built or historic environment. The parameters plan incorporates areas of new and improved landscaping, as well as ecological corridors and buffers. The scheme will help to achieve a net benefit for biodiversity through enhanced landscaping features, the incorporation of new and improved blue and green infrastructure, and the utilisation of existing features on the Site. Additionally, as set out above, measures to improve energy efficiency and increase energy conservation will be considered and implemented where appropriate, although this will be agreed at reserved matters stage.

5.61 Overall, it has been demonstrated that the proposals constitute sustainable development in the context of the PPW and the principle aim of the LDP.

6.0 Conclusions

6.1 This application seeks a flexible outline planning permission for the delivery of up to 11,613 sqm of industrial development, with all matters reserved for later determination.

6.2 In summary:

- Whilst the application site isn't specifically allocated for employment development, it is located within the wider Llay Industrial Estate, which is shown as an existing employment site on the Council's adopted Proposals Map. The site is therefore protected for B1, B2 and B8 employment generating uses.
- The Site is predominantly surrounded by compatible employment, industrial and commercial uses.
- The introduction of B1(c) / B2 / B8 employment uses on an under-utilised greenfield Site will help to complement and safeguard the employment offer on the surrounding industrial estate.
- The Site is located on the edge of the industrial estate, adjacent to Rackery Lane, which is well connected to the surrounding road network. The accompanying Transport Assessment shows that the impacts of delivering up to 11,613 sqm of employment development from a highways perspective would be acceptable.
- The outline proposals are considered to be acceptable in principle from an air quality; ecology; flood risk and drainage; and noise and amenity perspective.
- The proposal will result in further investment into Llay Industrial Estate and will encourage sustainable local and regional economic growth in accordance with LDP Policy SP8 (Economic Growth, Employment and Enterprise.
- The proposal is in accordance with the aims and objectives of the Development Plan as a whole.

6.3 This Statement has also demonstrated that the application proposals constitute sustainable development in the context of the PPW and the LDP. In particular, the proposals will safeguard B Use Class employment generating uses to assist foster economic activity, attract inward investment and support the growth of the local and regional economy.

6.4 On this basis, it is considered that the proposals fully accord with national and local policy and other relevant material considerations and as such, should be approved by the Council.

Appendix 1 Economic Benefits Infographic

LICHFIELDS

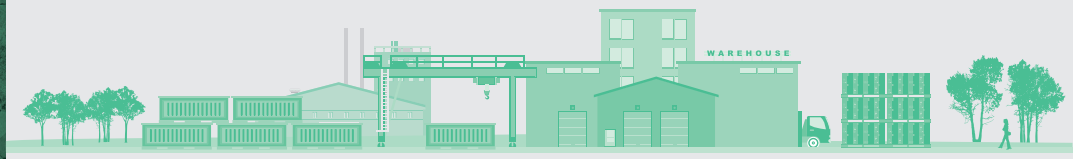
The economic benefits of

Land at Llay Industrial Estate, Wrexham

The delivery of up to 11,613 sqm of employment development on land at Llay Industrial Estate will help to complement the surrounding commercial uses in the area, whilst creating new jobs and promoting local and regional economic growth.



The proposal



up to 11,613 sqm of employment development

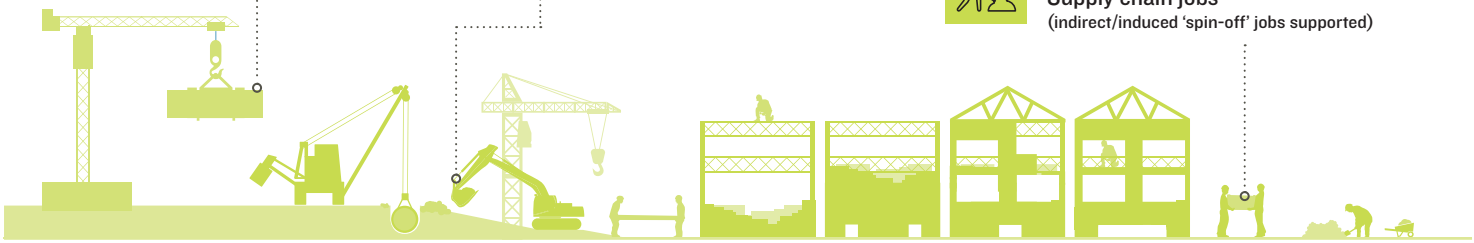
Construction benefits

£11.9m
Construction value
(total construction cost)

£10.9m GVA
Economic output
(additional GVA p.a.)

45 Jobs
Construction jobs
(temporary jobs over the 2 year build period)

54 Jobs
Supply chain jobs
(indirect/induced 'spin-off' jobs supported)



Operational and expenditure benefits

212 Direct jobs
(additional jobs from new commercial/community uses)

61 Supply chain jobs
(indirect/induced jobs supported)



93 Supported jobs
(from increased expenditure in local area)

£16.5m
Economic output
(additional GVA p.a.)

Local Authority revenue benefits

£188,016
Business rate revenues
(p.a.)



Analysis and design by Lichfields (April 2024)

(LF67079/01)

Appendix 2 Welsh Water Response

Dŵr Cymru
Welsh Water

Developer Services
PO Box 3146
Cardiff
CF30 0EH

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E.mail: developer.services@dwrcymru.com

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Caerdydd
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E.bost: developer.services@dwrcymru.com

Mr Worran Lloyd
Tier Consult
Unit 5 Office Village
Sandpiper Way
Chester Business Park,
Chester
Cheshire
CH4 9QZ

Date: 15/04/2024
Our Ref: PPA0008671

Dear Mr Lloyd

Grid Ref: 332621 356746
Site Address: Rackery Lane, Llay
Development: General industrial, 160 employees

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development.

APPRAISAL

Firstly, we note that the proposal relates to general industry staffing 160 employees and acknowledge that the site comprises of a potential windfall development with no allocated status in the Local Development Plan (LDP). Accordingly, whilst it does not appear an assessment has been previously undertaken of the public sewerage and watermains systems, we offer the following comments as part of our appraisal of this development.

Public Sewerage Network

The proposed development site is located in the immediate vicinity of a mixed sewerage system, comprising foul and surface water public sewers, which drains to Gresford Wastewater Treatment Works (WwTW).

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Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in Welsh and English

Dŵr Cymru Cyf, a limited company registered in Wales no 2366777. Registered office: Pentwyn Road, Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn Nelson, Treharris, Morgannwg Ganol CF46 6LY.

You are also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist you may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus in and around your site. Please be mindful that under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

Surface Water Drainage

As of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. As highlighted in these standards, the developer is required to explore and fully exhaust all surface water drainage options in accordance with a hierarchy which states that discharge to a combined sewer shall only be made as a last resort. Disposal should be made through the hierarchical approach, preferring infiltration and, where infiltration is not possible, disposal to a surface water drainage body in liaison with the Land Drainage Authority and/or Natural Resources Wales.

It is therefore recommended that the developer consult with Wrexham County Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please note, DCWW is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation. Please refer to further detailed advice relating to surface water management included in our attached Advice & Guidance note. In addition, please note that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.

Foul Water Drainage – Sewerage Network

We have considered the impact of foul flows generated by the proposed development and concluded that flows can be accommodated within the public sewerage system. We advise that the flows should be connected to the foul sewer at manhole SJ32565801 in Davy Way to the west. Should a planning application be submitted for this development we will seek to control these points of communication via appropriate planning conditions and therefore recommend that any drainage layout or strategy submitted as part of your application takes this into account. However, should you wish for an alternative connection point to be considered please provide further information to us in the form of a drainage strategy, preferably in advance of a planning application being submitted.

You may need to apply to Dwr Cymru Welsh Water for any connection to the public sewer under Section 106 of the Water industry Act 1991. However, if the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com

Foul Water Drainage – Sewage Treatment

Please note that the Natural Resources Wales have recently released Planning Advice relating to increased phosphate levels in several river Special Areas of Conservation (SAC). Applications for new development in these areas need to consider the requirements set out in the planning advice and should form part of the local planning authority's decision making when determining planning applications. The flows from this development would eventually drain to our Gresford Wastewater Treatment Works which has a phosphate consent. Notwithstanding this no problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site. If the development will give rise to a new discharge (or alter an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a Discharge Consent is independent of the planning process and a consent may be refused although planning permission is granted.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at **developer.services@dwrcymru.com**

Please quote our reference number in all communications and correspondence.

Yours faithfully,



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We welcome correspondence in Welsh and English

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Owain George
Planning Liaison Manager
Developer Services

<u>Please Note</u> that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.

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Gymraeg neu yn Saesneg

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