# Planning Statement

Section 73 Application
Kop Stand Development
STōK Cae Ras
Mold Road
Wrexham
LL11 2AH

**Prepared for:**

Wrexham Association Football Club Limited

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# 1. Introduction

### 1.1. Introduction

1.1.1. This Planning Statement ("Statement") has been prepared on behalf of Wrexham Association Football Club ("Wrexham AFC" or "the Club") in respect of the Kop Stand Development at the STōK Cae Ras, Mold Road, Wrexham, LL11 2AH ("the Site" or the "STōK Cae Ras").

1.1.2. The Application is submitted under Section 73 of the Town and Country Planning Act 1990 to amend Condition 2 which relates to the list of approved plans of Planning Permission P/2023/0776 (dated 9 January 2024) to allow for design changes to be made. The extent of the changes and the rationale is explained later in this Statement.

### 1.2. Section 73 Application Process

1.2.1. The Development Management Manual for Wales (2017) states that Section 73 applications can be used for the following:

- Extend the time limit of an existing permission (commonly referred to as a 'renewal' application)
- Allow 'minor material amendments' to planning permissions
- Allow the variation or removal of any other condition attached to a planning permission.

1.2.2. It is important to note that in terms of the amendments under Section 73 (which are explained later) there is no change to:

- Planning Permission boundary – the Section 73 mirrors the existing Permission.
- Land Use – no change to principal use as a stadium.
- The spectator capacity of the Kop Stand (5,500 limit) remains unchanged.
- Bulk and massing of the revisions is very similar to the existing Permission.

### 1.3. Application Documents

1.3.1. This application seeks to amend the design of the approved Kop Stand and therefore revised plans are submitted with this application. A Design & Access Statement ("DAS") has been produced to explain the design rationale, and updates have been prepared to some of the previously approved documents which are affected by the design changes.

1.3.2. The extent of requited information has been discussed, and agreed, with Wrexham County Borough Council ("WCBC"). The application deliverables are:

| Application Deliverable | Author |
|---|---|
| Planning Application Form & Notices | Savills |
| Site Location Plan (February 2025) | Populous |
| Planning Statement (January 2025) | Savills |

| | |
|---|---|
| Scheme Drawings (February 2025) | Populous |
| Design & Access Statement (February 2025) | Populous |
| Energy Strategy (January 2025) | Savills Earth |
| Ecology Appraisal (January 2025) | Buro Happold |
| Drainage Strategy (January 2025) | Buro Happold |
| Acoustic Note (January 2025) | Experience Studios |

### 1.4. Statement Structure

1.4.1. This Statement describes the revised drawings, the planning policy framework, assesses the planning merits of the revised designs, and concludes about the planning implications of the design update. In doing so, the Statement draws upon the other supporting documents (referenced above).

1.4.2. The remaining sections of this statement are structured as follows:

- **Section 2:** Provides a description of the Site, context and planning history;
- **Section 3:** Describes the Section 73 revised design proposals;
- **Section 4:** Identifies and summarises the most pertinent planning policy framework to the Site;
- **Section 5:** Undertakes an assessment of the revised design against the existing Planning Permission;
- **Section 6:** Draws together a summary and conclusion.

# 2. Site Description and Context

## 2.1. Site Description and Context

2.1.1. The Site on which the Kop Stand is to be developed is centred on grid reference SJ32885 50945. The Site covers an area of approximately 0.64ha, located entirely within the administrative area of WCBC.

2.1.2. The Site Location Plan (ref. WRX-POP-ZZZ-ZZZ-DR-AR-021001-P01) with the Site edged in red is enclosed and identifies the boundary of the proposed works. There is a blue line which represents other land in the control of the Club.

2.1.3. The Site is located entirely within the urban settlement boundary.

2.1.4. The Application Site is part of the STōK Cae Ras, which is the home Stadium for Wrexham AFC, and includes associated buildings, facilities, car parking and boundaries. The Site presently comprises Temporary Stand structures, including a Fan Zone (approved under application ref. P/2023/0907 and ref. P/2024/1323).

2.1.5. To the north west of the Site is the Wrexham Glyndwr University Campus including the Students' Union and the William Aston Hall. Immediately to the north is the Wrexham Student Village, beyond that are sports pitches associated with the University and further University buildings. The east of the Site is bound by Crispin Lane, beyond that is the railway line and Wrexham General Rail Station. South west of the Site is Mold Road (A541) and an area of residential properties to the south of the road. Beyond that is Technology Park and the Wrexham Maelor Hospital.

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

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

2.1.8. There are no known Tree Preservation Orders across the Site.

2.1.9. The Site is not subject to any 'sensitive area' designations as set out within the 2017 Regulations[1].

## 2.2. Planning History

STōK Cae Ras

2.2.1. **Table 2.1** below presents the relevant planning applications made relating to the STōK Cae Ras (i.e. the wider stadium including the application Site).

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

| The Racecourse Ground / STōK Cae Ras | | | |
|---|---|---|---|
| **Reference** | **Description** | **Decision** | **Decision Date** |
| P/2024/1452 | Erection of concession stands, marquee, stage, fencing and associated works (known as the "*Fan Zone*") | Granted | 10/12/2024 |
| P/2024/1323 | Extension to current Temporary Stand to increase capacity to 3,020 | Granted | 07/10/2024 |
| P/2023/0776 | Removal of condition 3 (proposed Kop Stand spectator capacity limit) of planning permission P/2023/0725 | Granted | 09/01/2024 |
| P/2023/0325 | Discharge of condition 11 (drainage) of planning permission P/2023/0248 | Granted | 04/05/2023 |
| P/2023/0248 | Variation of condition 7 (contamination) of planning permission P/2022/0725 to amend condition wording | Granted | 12/04/2023 |
| P/2023/0247 | Discharge of conditions 4 (construction management plan), 5 (contamination) and 9 (piling) of planning | Granted | 11/04/2023 |
| P/2023/0907 | Erection of Temporary Stand (capacity 2,289) with additional 20 wheelchair spaces (in retrospect) | Granted | 10/04/2024 |
| P/2023/0706 | Advertisement consent for 4 signs | Granted | 02/10/2023 |
| P/2023/0707 | Advertisement consent for 6 fascia signs (non-illuminated) (in retrospect) | Granted | 02/10/2023 |
| P/2022/0725 | Kop development for 5,500 spectator seats, inclusive of a 500 capacity hospitality area, with a 600 capacity non-match day exhibition space, new public realm and associated works | Granted | 12/01/2023 |
| P/2022/1059 | Discharge of condition 4 (construction traffic management plan) of planning permission P/2022/0548 | Granted | 19/12/2022 |
| P/2022/1041 | Discharge of condition 3 (photographic survey) of planning permission P/2022/0548 | Granted | 12/12/2022 |
| P/2022/0548 | Erection of freestanding and stand mounted floodlights (and associated works) | Granted | 13/06/2022 |
| P/2022/0515 | Prior notification of demolition of buildings (existing Kop) | Granted | 24/06/2022 |
| P/2013/0215 | Erection of four signs at Glyndwr University Racecourse Stadium | Granted | 26/04/2013 |

| | | | |
|---|---|---|---|
| P/2012/0717 | New entrance doors and accessible ramp for club shop | Granted | 22/11/2012 |
| P/2012/0718 | New signage for club shop | Granted | 21/11/2012 |
| P/2012/0275 | Erection of 1 no. Fascia Sign | Granted | 15/05/2012 |

*Table 2.1: Planning History of STōK Cae Ras*

2.2.2. In June 2022 WCBC determined that prior approval was not required for the demolition works at the former (derelict) Kop Stand which comprised of (but is not limited to) the utility disconnection, tree felling / vegetation removal, asbestos removal, soft stripping, demolition of all structures down to existing floor slab level and the removal of ground floor slabs, foundations and drainage within the building footprint (Ref: P/2022/0515).

Kop Stand

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

2.2.4. In January 2024, an amendment to the Planning Permission was approved under Section 73, which allowed the full 5,500 capacity to be used, and removed the restrictions on when the hospitality and conference spaces could be used.

2.2.5. This resulted in a revised Planning Permission (P/2023/0776) which has the following conditions:

| Condition | Purpose | Effect |
|---|---|---|
| Condition 1 | Development must commence by 12 January 2028 | Time limit |
| Condition 2 | Development to be built in accordance with the Approved Plans | Control of Approved Plans |
| Condition 3 | Spectators should not exceed 5,500, for football and non-football events. | Control on Capacity |
| Condition 4 | Construction Method Statement to be approved by WCBC | Required before Implementation |
| Condition 5 | Contaminated Land Risk Assessment to be approved by WCBC | Required before implementation |
| Condition 6 | Remediation strategy verification to be approved by WCBC. | Required before the Development is operational |
| Condition 7 | Long-term monitoring plan for land contamination to be approved by WCBC | Required before the Development is operational |

| | | |
|---|---|---|
| Condition 8 | Contamination works monitoring | No action unless unexpected contamination on site |
| Condition 9 | Details of piling or other foundation method to be approved by WCBC | Required before implementation |
| Condition 10 | Surface water drainage in accordance with approved plans | Control of Approved Plans |
| Condition 11 | Detailed materials to be approved by WCBC | Prior to use on site |
| Condition 12 | Public realm details to be approved by WCBC | Prior to substantial completion |
| Condition 13 | Net biodiversity benefit scheme to be implemented | Required before the Development is operational |
| Condition 14 | Public Realm Management Plan (PRMP) to be approved by WCBC | Required before the Development is operational |
| Condition 15 | Travel Plan to be approved by WCBC | Required before the Development is operational |
| Condition 16 | Noise should not exceed existing pre-existing background | Control condition |

*Table 2.2: Application P/2023/0776 Conditions*

2.2.6. A number of the conditions, which require approval before a start on site, have been addressed as follows:

| Condition | Purpose | Status |
|---|---|---|
| Condition 4 | Construction Method Statement to be approved by WCBC | Discharged 01/03/23 (Ref: P/2023/0247) |
| Condition 5 | Contaminated Land Risk Assessment to be approved by WCBC | Discharged 01/03/23 (Ref: P/2023/0247) |
| Condition 9 | Details of piling or other foundation method to be approved by WCBC | Discharged 01/03/23 (Ref: P/2023/0247) |
| Condition 10 | Surface water drainage in accordance with approved plans | Discharged 25/09/23 (Ref: P/2023/0325) |

*Table 2.3: Application P/2023/0776 Conditions*

Temporary Stand and Temporary Stand Extension

2.2.7. In April 2024, planning permission was granted (planning ref. P/2023/0907) for the erection of a Temporary Stand with a capacity of 2,289 and an additional 20 wheelchair spaces. This was due to the significant demand for tickets for Wrexham AFC home games, and likely delays in the commencement of the replacement Kop Stand. The Club identified an opportunity to introduce a Temporary Stand to provide a short-term opportunity to accommodate additional home supporters, create a four sided environment and demonstrate a commitment to delivering Stadium enhancements as part of the Club's vision and ambition.

2.2.8. In October 2024, planning permission was granted (planning ref. P/2024/1323) for an extension to the Temporary Stand to provide an additional 681 seats, allowing for an overall capacity of 3,020.

Wider Site

2.2.9. In 2006 part of the STōK Cae Ras and adjoining land was subject to a redevelopment scheme for the demolition of the existing east stand and existing car showroom to facilitate a mixed use development comprising of private residential apartments, student accommodation units, retail, site for new stand and associated works (Planning ref. P/2006/0443). Further, a Reserved Matters application pursuant to the outline planning permission above was submitted (Planning ref. P/2007/0125).

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

2.2.11. An application was granted in 2018 for up to 410 residential units with car parking, landscaping, and associated infrastructure (Planning ref. P/2018/0671). Various Reserved Matters applications have been submitted following the outline approval, with the application reduced to 90 detached and semi-detached homes (P/2021/0094). An outline planning permission was granted for student accommodation facility up to 197 bed spaces, parking, and landscaping (Planning ref. P/2018/0672) in 2019. An application for Reserved Matters (Planning Ref. P/2022/0551) was approved in 2022.

2.2.12. A further application to vary Condition 7 of Planning Permission P/2008/1296 to amend the wording of the condition was submitted in October 2024 and is presently under consideration by WCBC (Planning Ref. P/2024/1535). The application proposes to vary the condition to define the use of the site principally as student accommodation with flexibility for the summer holiday period to enable short-term lets for non-students.

# 3. Proposals

### 3.1. Proposals Overview

3.1.1. The scheme approved in January 2023, was the result of an initial design brief formulated in 2021, soon after the present Owners acquired Wrexham AFC. The scheme reflected the vison and ambition of Wrexham AFC at that time which was focused on repairing the STōK Cae Ras to be a 4-sided Stadium again. This was an important commitment from the Wrexham AFC Owners, as the Stadium had not had the Kop Stand in use for over 10 years.

3.1.2. The vision for the approved scheme began when Wrexham AFC was competing in the National League. Wrexham AFC has achieved great success on the pitch with back-to-back promotions in 2023 and 2024 and it is timely for the Owners to review the approach to the Kop Stand to ensure it meets the transformational profile and interest in the Club, alongside the ambition to continue progressing through the football pyramid.

3.1.3. As part of the refreshed approach to the Kop Stand, Wrexham AFC appointed Populous in October 2024 to lead the design review.

*3.1.4.* Populous is a global architectural design firm specialising in creating environments and venues that draw communities and people together. They have extensive experience in designing stadiums, arenas and event spaces across the globe. Populous state that their aim is to:

> "*create a home for Wrexham's passionate fans and the community that pays tribute to the heritage and traditions of the Club and the City itself. The Kop stand will be the epicentre of the atmosphere at the ground on matchday, while incorporating enhanced facilities that can be used every day throughout the year.*"

3.1.5. The STōK Cae Ras has been proposed as the host venue in North Wales for the final of the UEFA EURO Under-19s Championship Finals in summer 2026. This tournament was awarded to the Football Association of Wales to form the centrepiece of their 150th anniversary in the City of Wrexham where they were formed. The development of the new Kop Stand is important so as to portray the City of Wrexham in a positive way around the World, which may not be achieved with a three sided ground (as temporary stands cannot be used) and allow Wrexham to build on its rich heritage of hosting international matches and allowing it to host future international sporting events by achieving UEFA Category 4 Stadium certification.

3.1.6. The STōK Cae Ras is a key part of the Wrexham Gateway initiative to transform this important transport hub in the City. The Kop Stand represents the first major initiative that will be delivered.

### 3.2. Proposed Approved Scheme Amendments

3.2.1. The scheme amendments fall within key parameters that respect the existing planning permission, including:

- Land Use – the revised designs do not change the principal land use of the site as a Stadium.
- Application Site – the boundary of the Section 73 application is identical to the approved permission.
- Scale – the massing of the revised design is very similar to that of the approved permission.

- Capacity – the delivery of the revised design will still fall within the spectator capacity limit of 5,500.
- Public Realm – the scope for public realm enhancements on the site remain similar to the approved permission.
- Effects – the design envelope and structure enclosure is similar to the approved scheme so there is no material change to external noise receptors in the wider area, and of course the capacity remains the same as previously assessed (5,500). The revised Populous design and the acoustic modelling will, however, ensure maximum atmosphere is captured within the Stand.

3.2.2. The main changes, which are allowed within the Section 73, are as follows:

1. Building position – the footprint of the proposed Stand is adjusted very slightly, which will allow an amendment to the pitch.
2. Floorplans – the revised approach has allowed a re-organisation of various player facilities at the Stadium, back of house requirements (such as media space) and flexibility on hospitality options. These amendments also meet the requirements for UEFA games including officials' spaces. The updated plans also include access to a roof terrace, which will allow views across the City and into the Stadium.
3. Players' Tunnel – the revised floorplans include the opportunity for players changing facilities which link into a tunnel feature to allow access to the pitch through the Kop Stand. The Owners see this as an amazing experience for players to emerge within the Kop Stand amongst 5,500 home supporters.
4. Future capacity – the Owners' ambition means that future Stadium enhancements require a forward looking vision of the Stadium's development, and on the Kop Stand this is reflected in some future-proofing by building a structure that could allow a capacity above 5,500. It is important to note that the additional structure represents an investment risk by Wrexham AFC as utilising the additional space will be entirely dependent upon a future planning application (separate to this Section 73 Application).
5. Design – the reorganisation of the floorplans, the UEFA compliant requirements, the reset of the Owners' vision and the appointment of Populous has led to a new design approach. The Populous Design and Access Statement explains the rationale behind the elevational design, the relationship between ground floor activities and the upper floors, the façade treatments and materials.

3.2.3. These changes will provide a revised set of drawings to reflect the design and replace those previously approved under Condition 2 of the existing Planning Permission (Ref: P/2023/0776).

3.2.4. The remaining conditions on the existing Planning Permission will apply to these Section 73 changes.

# 4. Planning Policy Overview

## 4.1 National Planning Policy

*Future Wales: The National Plan 2040*

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

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

4.1.3. The Section 73 Application relates only to design changes as the principle of development, scale & massing, spectator capacity and impacts on matters such as transport, residential amenity have all been covered by the existing Planning Permission.

**Development Plan**

4.1.4. The existing Planning Permission for the replacement Kop Stand was originally considered at Planning Committee in November 2022. In terms of the development plan the proposal was considered against policies within the Unitary Development Plan (UDP) and the Local Development Plan (LDP).

4.1.5. Since the decision the LDP has been adopted by WCBC, though in December 2024 there has been further legal decisions regarding the status of the development plan. The Section 73 Application relates only to an alteration of design of an extant Planning Permission (which is capable of implementation). The following paragraphs pick up the key policies on the UDP and LDP.

*Wrexham Unitary Development Plan 1996-2011 (February 2005)*

4.1.6. Policy GDP1 states that all new development within the county should ensure that scale, design and layout accords to the character of the Site, while contributing positively to the nearby locality. Further, the policy notes that proposals should ensure the development of sustainable communities, through promoting the economic, social and environmental well-being of the area.

*Wrexham Local Development Plan 2 (LDP2) (2013-2028)*

4.1.7. Policy CF3 (Regional Sports Stadia) states that the continued use of a number of sports stadia, including the STōK Cae Ras, will be safeguarded. Development proposals which enhance existing facilities at the named stadia, including the STōK Cae Ras, will be supported by WCBC.

**Other Material Planning Considerations**

*Planning Policy Wales (Edition 12) (February 2024)*

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

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

# 5. Assessment

## 5.1. Introduction

5.1.1. This section of the Planning Statement assesses the key planning considerations relevant to the Kop Stand Development, taking into account the policy framework, planning history and analysis within the supporting application documents.

## 5.2. Land Use

5.2.1. The Site has been consistently recognised in development plan policy as being encouraged for further enhancements. The Section 73 Application does not alter the land use context already approved under the existing Planning Permission.

## 5.3. Design

5.3.1. A Design and Access Statement ('DAS') accompanies the application and sets out full detailed analysis of the Site, its context and design evolution. That document should be referred to for full details and design critique. It is worth highlighting the DAS conclusions:

> *Stok Cae Ras marks a special moment in the history of the oldest international football ground in the world (that still hosts international football). It provides the opportunity to restore the traditional 4-sided enclosure of the stadium with a piece of architecture that reflects the history and heritage of the City of Wrexham, while providing new and improved facilities that respond to the requirements of present day and future sports fans and visitors.*
>
> *It provides a new piece of civic architecture that complements some of the other landmarks within the City and creates a new destination for visitors to the City and the local community. It reflects the confidence that the football club can play a key role in the rejuvenation and development of the City through its role in the Wrexham Gateway Project, as well as enhancing the facilities that the stadium can offer the football club.*
>
> *The upgrading of facilities to meet UEFA Category 4 specifications are central to the wider vision of bringing international sport back to the Stok Care Ras and the public benefit that this will bring to the local community of hosting these events in North Wales.*
>
> *The architectural design of the building, with its distinctive shape and form, seeks to provide a new identity for eh Stok Cae Ras that reflects the commitment of the generations of spectators who have supported the club since it was formed in 1864, while looking to a more confident where local, national and international spectators can gather and enjoy the action on the pitch.*

## 5.4. Heritage Impact

5.4.1. The Site itself has no known heritage assets or historic environment constraints within its red line boundary. The existing Planning Permission concluded no harm to any nearby heritage assets, and given the bulk and massing of the revised

scheme is almost identical then the principle of similar conclusions are likely. The Section 73 purposes a revised design with elevational treatment and materials.

5.4.2. The DAS contains elevational plans and context with the nearest listed buildings being Plas Coch (part of the University) (Grade II) approximately 500m to the north west and Wrexham General Station (Grade II) approximately 500m to the south. There is no harm to the setting of these listed buildings.

5.4.3. The nearest conservation area is Grosvenor Road Conservation Area, approximately 700m to the south-east of the Site. The Grosvenor Road Conservation Area was first designated by WCBC in September 1990, and later amended in July 2007. Given the distances and topography it is clear that the Kop Stand will not be harmful to the character or appearance of the Conservation Area.

**5.5. Drainage and Flood Risk**

5.5.1. According to the Natural Resources Wales Flood Map for Planning, the Site is not within an area at risk of flooding from rivers and sea, and the Site has not experienced any historic flooding. In terms of flooding from Surface Water and Small Watercourses, parts of the Site are covered by Flood Zone 2 and 3, however this is minimal.

5.5.2. The exiting Permission was accompanied by a Drainage Strategy. This report has been updated by Buro Happold to reflect the revised designs for the Section 73 application. The Drainage Strategy conclusions are:

> *Surface Water*
> *The overall proposed surface water drainage strategy remains consistent with the strategy presented in drawing WRXRAM-ZZ-ZZ-DR-CD-00102, whereby there is no material change to the proposed surface water management train and SuDS strategy.*
> *The changes to the catchment areas do not have a significant impact on the proposed surface water drainage strategy as both the public realm and stand area are hardscape and have the same runoff coefficient, therefore the total impermeable area is largely the same.*
> *The area between the front of the stand and the pitch is to be permeable, as per The Original Strategy Document.*
>
> *Foul Water*
> *The overall foul water drainage strategy remains unchanged from The Original Strategy Document. Foul water flows are to be collected in a below ground drainage network and discharged to the adjacent Welsh Water sewer network.*

5.5.3. Surface water drainage will be designed up to the 1 in 100-year storm event with an allowance of 40% for climate change. This will ensure that the peak rate of storm water leaving the developed site is controlled and accounted for within the design.

**5.6. Energy**

5.6.1. The Section 73 design changes have been assessed against the relevant planning policies and the Building Regulations 2010 (Approved Document Part L2 (2022)). The conclusions set out in the Energy Statements are:

*The design aligns with the Energy Hierarchy outlined in Planning Policy Wales (adopted February 2024) and includes the following features:*

*Minimising energy demand by utilising a fabric first approach and specifying low U-Values and air permeability along with passive design measures to reduce heat loss, and*

*Efficiently uses energy through a highly efficient ventilation system, reversible Air Source Heat Pumps (ASHP) for heating and cooling, and a dedicated ASHP for hot water eliminating fossil fuels*

*The potential carbon emission savings for the development on the proposed site is estimated to be 66% over the TER baseline of Part L2 (2022).*

**5.7. Noise**

5.7.1. The existing Planning Permission was supported by an acoustic assessment to demonstrate the effects of the scheme on nearby receptors. The scale of the replacement design, and the extent of enclosure on the Kop Stand will not materially change the impacts. A note has been produced from Experience Studios which explains their analysis. The design work by Populous will enhance the acoustics within the new Kop Stand helping to amplify the atmosphere.

5.7.2. The mechanical plant on the revised Kop Stand will comply with existing acoustic controls.

**5.8. Ecology**

5.8.1. The approved Kop Stand of January 2023 was supported by a Preliminary Ecological Appraisal, which proposed a number of measures to encourage biodiversity, which was supported by Natural Resources Wales. Since that approval, the former derelict Kop Stand has been demolished.

5.8.2. This Section 73 Application is supported by an Ecological Appraisal by Buro Happold. The key findings and recommendations of the updated information states:

*Following the demolition of the old stand and site clearance the site now has low ecological value. The UK Habitat survey identified that the site currently comprises hardstanding, a temporary stand, a fan zone with small storage units, artificial unvegetated surfaces, and small patches of sparsely vegetated urban land with short ephemeral and perennial vegetation, stones and rubble.*

*The Preliminary Roost Assessment (PRA) found no bat roosts or evidence of roosting bats. The temporary structures on site (including the stand and small buildings) lack features suitable for roosting bats and are considered to have negligible potential for supporting them. Therefore, no further bat surveys were required.*

*No evidence of other protected or priority species was found during the survey, and the site provides limited habitat to support them. Consequently, no further species surveys were required.*

*Recommendations include mitigation measures and enhancements such as landscaping that incorporates wildflower and pollinator-friendly planting, integration of sustainable drainage systems green walls and gardens where feasible, as well as the provision of habitat features such as bat and bird boxes and features supporting invertebrates. All of these will contribute to delivering a Net Benefit for Biodiversity.*

5.8.3. The details of the public realm will be submitted as part of the discharge of Conditions 12 and 13.

**5.9. Environmental Impact Assessment (EIA)**

5.9.1. In June 2022, a Screening Request was submitted to WCBC under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment)(Wales) Regulations 2017 to determine if the proposals should be subject to an Environmental Impact Assessment ("EIA"). On 17 August 2022, WCBC confirmed that an EIA would not be required given that the proposals did not meet the relevant criteria as set out in Regulation 2 of the EIA Regs. Given the Section 73 proposals are the same in terms of scale and capacity to the previously approved Kop Stand (P/2023/0776), then clearly no EIA would be required.

# 6. Conclusion

6.1.1. This Planning Statement has been prepared in support of a Section 73 planning application on behalf of Wrexham AFC in relation to the Kop Stand development, to amend Condition 2 which relates to the list of approved plans of permission P/2023/0776 to allow for design changes to be made.

6.1.2. The scheme approved in January 2023, was the result of an initial design brief formulated in 2021, soon after the present Owners acquired Wrexham AFC. The scheme reflected the vison and ambition of Wrexham AFC at that time which was focused on repairing the STōK Cae Ras to be a 4-sided Stadium again. This was an important commitment from the Wrexham AFC Owners, as the Stadium had not had the Kop Stand in use for over 10 years.

6.1.3. The vision for the approved scheme began when Wrexham AFC was competing in the National League. Wrexham AFC has achieved great success on the pitch with back-to-back promotions in 2023 and 2024 and it is timely for the Owners to review the approach to the Kop Stand to ensure it meets the transformational profile and interest in the Club, alongside the ambition to continue progressing through the football pyramid.

6.1.4. The profile of Wrexham AFC, and the delivery of the revised Kop Stand, would allow the STōK Cae Ras to be a host venue for the Euro Under-19s Championship Finals in summer 2026. The requirements for hosting such tournament games require a range of facilities that the new Kop Stand allows the Stadium to fulfil. In hosting international fixtures, it builds on the Stadium's rich heritage of international fixtures and a platform for many more in the future.

6.1.5. Overall, the Kop Stand will have a transformational effect on Wrexham AFC, the Wrexham Gateway, the City and North Wales.