PLANNING STATEMENT

LAND SOUTH OF BRYN LANE, WREXHAM

Mauna Kea Ltd

Carter Jonas

Classification L2 - Business Data

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1.0 INTRODUCTION

1.1 Carter Jonas LLP is instructed by Mauna Kea Limited (the "Applicant") to act as planning agent in relation to a proposed development at Land South of Bryn Lane, Wrexham (hereafter referred to as "the Site").

1.2 Mauna Kea Limited is a fully owned subsidiary of Net World Sports ('NWS'). NWS is an award-winning global online retailer than specialises in sports, fitness, leisure, and home & garden supplies. NWS are a long-term investor and occupier within the Wrexham Industrial Estate, operating from their Headquarter Building off Bryn Lane. NWS are seeking to develop land in the wider area for further employment uses.

1.3 NWS' overall objective for the Site is to accommodate a range of uses, noting their business needs currently centre on providing space for manufacturing and storage. The intention is that NWS would occupy this building themselves accommodating a mix of these uses, with storage space fully utilised through the use of a Very Narrow Aisle racking system to take advantage of the height available in the building.

1.4 This would ensure that the remaining space is maximised for manufacturing purposes. This use is critical to support NWS' wider business operations and create greater resilience in terms of supply chain management. However, retaining flexibility is important, noting a purely logistics and warehousing use may ultimately be preferable either by NWS or should they ultimately not occupy the building. The planning application seeks to consider the reasonable worst-case scenario in assessments.

1.5 This Planning Statement has been prepared in support of a Full Planning Application for:

Demolition of existing structures, site clearance and preparation works, and erection of new employment facilities (Use Class B2 and B8) with ancillary office accommodation (Use Class B1a), landscaping, car and cycle parking, access arrangements, and other associated works.

1.6 This Statement should be read in conjunction with the following documents which accompany the planning application package

- Covering Letter prepared by Carter Jonass LLP
- Completed Application Forms prepared by Carter Jonas LLP
- Planning Statement prepared by Carter Jonas LLP
- Pre-application consultation report prepared by Carter Jonas LLP
- Design & Access Statement prepared by PACE & Nicholsons
- Site Location Plan prepared by PACE (Ref: 2042.P.001)
- Existing Site Plan prepared by PACE (Ref: 2042.P.002)
- Proposed Site Plan prepared by PACE (Ref: 2042.P.004)

- Proposed Elevations prepared by PACE (Ref: 2042.P.007)
- Proposed Sections prepared by PACE (Ref: 2042.P.008)
- Demolition Plan prepared by PACE (Ref: 2042.P.009)
- Proposed Office Plans prepared by PACE (Ref: 2042.P.006)
- First Floor General Assembly prepared by PACE (Ref: 2042.P.010)
- Second Floor General Assembly prepared by PACE (Ref: 2042.P.011)
- Existing Ground Levels (Earth Works Analysis) prepared by Tier Consult (Ref: T_23_2721-TCG-XX-XX-M3-C_0601 and T_23_2721-TCG-XX-XX-M3-C_0602)
- Proposed Ground Levels prepared by Tier Consult (Ref: T_23_2721-TCG-XX-XX-M3-C-6001 and T_23_2721-TCG-XX-XX-M3-C-6002)
- Landscaping Drawings prepared by Nicholsons, with drawing references as follows:
    - 1059-01-NLA.150 Bryn Lane South_Detailed Soft Landscape Design V3-1.Site Overview
    - 1059-01-NLA.150 Bryn Lane South_Detailed Soft Landscape Design V3-2.Inset 1
    - 1059-01-NLA.150 Bryn Lane South_Detailed Soft Landscape Design V3-3.Inset 2
    - 1059-01-NLA.150 Bryn Lane South_Detailed Soft Landscape Design V3-4.Inset 3
    - 1059-01-NLA.150 Bryn Lane South_Detailed Soft Landscape Design V3-5.Inset 4
    - 1059-01-NLA.150 Bryn Lane South_Detailed Soft Landscape Design V3-6.Inset 5
    - 1059-01-NLA.150 Bryn Lane South_Detailed Soft Landscape Design V3-7.Inset 6
    - 1059-01-NLA.150 Bryn Lane South_Detailed Soft Landscape Design V3-8. Initial Plant Schedule
- Landscape and Visual Impact Assessment (LVIA) prepared by Nicholsons
- Arboricultural Impact Assessment prepared by Bowland Tree Consultancy
- Ecological Impact Assessment prepared by The Environment Partnership
- Historic Environment Desk-Based Assessment prepared by The Environment Partnership
- Transport Assessment prepared by Cora IHT
- Travel Plan prepared by Cora IHT
- Flood Consequences Assessment prepared by Hilson Moran

- Phase 1 Contaminated Land Assessment prepared by Hilson Moran
- Air Quality Assessment prepared by Hilson Moran
- Low Carbon and Renewable Energy Assessment prepared by Hilson Moran
- Drainage Strategy prepared by Tier Consult
- Drawing Layout Drawings prepared by Tier Consult (Ref: T_23_2721-TCG-XX-XX-DR-C_5501 and T_23_2721-TCG-XX-XX-DR-C_5502)
- Utilities Statement prepared by Tier Consult
- Noise Assessment prepared by Tetra Tech
- BREEAM Assessment prepared by Ridge

1.7 This Planning Statement seeks to assess the proposal in the context of relevant material planning considerations and is structured as follows:

- Section 2: Describes the site and its surrounding context;
- Section 3: Describes the consultation process
- Section 4: Outlines the proposed development
- Section 5: Identifies the Development Plan and other material planning considerations relevant to the determination of this application;
- Section 6: Assesses the proposal in the context of the identified relevant Development Plan policies and other material considerations;
- Section 7: Summarises the planning case in support of the scheme

2.0 SITE AND SURROUNDINGS

2.1 The Site was previously in the ownership of the Welsh Assembly who have sought a buyer to deliver employment uses as soon as practically possible. The Site represents one of the few remaining 'gap sites' within the Wrexham Industrial Estate and, rarer still, one which benefits from access to Bryn Lane, a key access route. Therefore, it is critical that this land be used effectively for employment purposes to support national, regional, and local objectives.

Site Description

2.2 The site is located on the northern edge of Wrexham Industrial Estate (Figure 1), extending to approximately 3.72 ha and is currently accessed from Bryn Lane to the north, although it is not publicly accessible.

2.3 The Site was historically used for manufacturing purposes and has since predominantly become grassland which was previously grazed. It is situated between existing industrial units to the east, west, and south.

2.4 The northern, eastern, and southern boundaries are typified by trees and shrubland which is particularly dense in the south-eastern corner and northern boundary, separating the site from adjacent plots and Bryn Lane. The western boundary is bounded by security fencing.

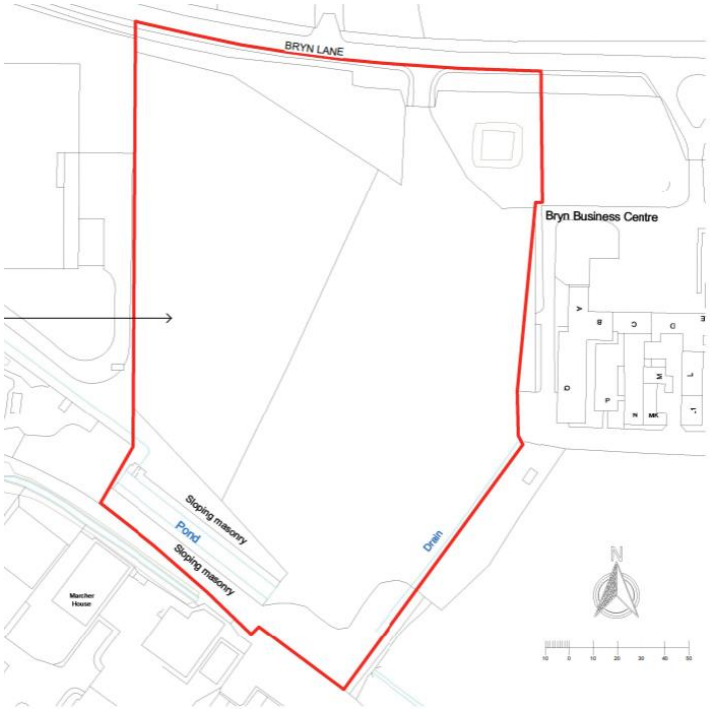


Figure 1: Application Site (red outline)

2.5 There are several existing features on site including a redundant fencing in the middle of the Site and a derelict, disused bunker in the north-western corner. These elements will be demolished as part of the

development. In the south-western corner, a man-made drain is present which will be retained through the scheme. In addition, there are other drains present at the eastern boundary.

Site Surroundings

2.6 The site is located within the Wrexham Industrial Estate. Wrexham Industrial Estate is the UK's second-largest industrial estate extending to over 550ha2 and is recognised as a regionally and nationally importance employment area. It is located 2.5 miles to the east of Wrexham Town Centre.

2.7 Bryn Lane to the north adjoins Industrial Estate Road which is a dual carriageway and a key road in the local highway network, linking Wrexham Industrial Estate to the A534, the path of which continues to Wrexham Town Centre.

2.8 Land to north of the Site is currently used as agricultural land. However, immediately beyond Bryn Lane, lies a single residential property and associated barn/agricultural buildings. Whilst currently tenanted, the property is owned by the Applicant and forms part of the wider "Land North of Bryn Lane" development which is pending determination (Application Reference: P/2023/0497).

2.9 This was submitted by the Applicant and validated on 19th July 2023. The hybrid planning application proposes a large employment proposal split into three parcels. Notably, the aforementioned property falls within the 'detailed' element of the hybrid application and will be demolished to deliver employment uses in the future.

2.10 To the east, south, and west of the site lie various industrial uses associated with the wider industrial estate. Adjacent uses include warehouses used for leisure, distribution, manufacturing, and storage alongside the Kellogg's Factory which occupies a substantial footprint to the south-east of the Site.

2.11 The Site is well served by public transport, with bus stops at Abbey Road and Ash Road North within walking distance of the site, approximately 250m to the south, providing regular bus services to Wrexham Town Centre.

Heritage

2.12 The site is not located within or near a Conservation Area. There are no listed buildings, Registered Parks & Gardens, or Scheduled Ancient Monuments within or directly adjacent to the site boundary, as shown in **Figure 2**.

2.13 Further information is provided within the Heritage Statement produced by TEP.



Figure 2: Extract from Historic Wales National Heritage List for Wales (Site marked in red, Listed buildings marked by blue pin)

Ecology

2.14 The site is not subject to any statutory nature conservation designations.

2.15 There are three internationally designated wildlife sites within 10km of the site, these are Afon Dyfrdwy a Llyn Tegid (River Dee and Bala Lake) which is a Special Area of Conservation (SAC) in Wales and England and a Site of Special Scientific Interest (SSSI) and is 3.1km to the east of the site. The Midlands Meres and Mosses Phase 2 Ramsar site is 3.5km to the north west of the site. The Johnstown Newt Sites are also a SAC 8km to the south west of the site. In terms of national designations, there is the River Dee and Bala Lake SSSI, and also the Vicarage Moss SSSI which is 3.7km to the north west of the site, Sontley Marsh SSSI located 4.7km to the south west of the site and Marford Quarry SSSI located 5km to the north west of the site.

2.16 More information regarding the ecology at the site is provided within the Ecological Impact Assessment produced by TEP.

Flood Risk

2.17 The Natural Resource Wales (NRW) flood risk map identifies the site as being within Flood Risk Zone 1 for tidal and fluvial flooding and therefore has a low probability of flooding (less than 1 in 1,000-year annual probability).

2.18 The risk of flooding from surface water map shows the site as predominantly being in an area at very low risk of overland and surface water flooding, with a number of isolated areas shown to be potentially at low to high risk of surface water flooding.

2.19 Further details regarding the risk of flooding at the site are provided in the accompanying Flood Consequences Assessment produced by Hilson Moran and the Drainage Statement produced by Tier.

Agriculture

2.20 The site's agricultural land classification is 3B, as denoted on the Welsh Government's "Agricultural land classification: predictive map". Therefore, the land is not considered to be "best and most versatile" (BMV).

Planning History

2.21 A search of the Council's online planning register has been undertaken, and no previous applications relate to the site. However, the relevant planning applications, which are in close proximity to the site, have been identified below.

Table 1: Relevant applications in the surrounding area

Reference	Address	Proposal	Decision
P/2023/0280	Land Off, Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT Developer: FI Real Estate	Hybrid planning application for (a) outline permission (all matters reserved except for means of access) for erection of up to 3 warehouse & distribution units (Use Class B8), including ancillary office accommodation, comprising up to 93,019 sqm net floorspace, service yards, car parking, HGV parking, internal circulation, landscaping and ancillary works; and (b) detailed permission for demolition, means of access, earthworks, drainage, landscaping, ecology zone and relative ecological mitigation measures, and ancillary works.	Granted 05/07/24
P/2023/0497	Land North Of, Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9US	Hybrid Planning application seeking: Full planning permission for the demolition of existing buildings and re-profiling of the site for development comprising the severable and phased construction of employment floorspace	Validated 19/07/23 and pending determination

Reference	Address	Proposal	Decision
	Developer: Net World Sport	(Use Class B1C/B2/B8) and ancillary (integral) office floorspace (Use Class B1a) and the provision of associated infrastructure including earthworks, sub-station, parking, landscaping, access from industrial Estate Road roundabout and Bryn Lane and internal estate road; and Outline planning permission for the severable and phased construction of employment floorspace (Use Class B1C/B2/B8) and ancillary (integral) office floorspace (Use Class B1a), ancillary retail and drive thru facilities, a hotel and petrol filing station (Use Class A1/A3/C1/SUI generis) and associated infrastructure including earthworks, internal estate road, parking and landscaping (all matters are reserved for future determination)	
P/2021/0436	Land South of Holt Road, Wrexham Developer: Barratt Homes and Bloor Homes	The application was for up to 600 dwellings with associated highways, landscape and open space.	Validated 04/05/2021 and pending determination (subject to Planning Appeal)

3.0 CONSULTATION

3.1 The following section summarises the consultation which has been undertaken with key stakeholders including WCBC, specialist consultees, and the local community. A headline review of engagement is provided below, with further details are provided within the accompanying Pre-Application Consultation Report.

Consultation with Wrexham County Borough Council (WCBC)

3.2 The application proposals have been discussed with WCBC Officers as part of extensive Pre-application discussions (reference ENQ/2024/1039).

3.3 The Council issued a pre-application response on 5th August 2024. The response identified planning and land use constraints at the site, summarised the relevant planning history, identified relevant planning policies, and provided pre-application advice.

3.4 The advice in general confirmed the principle of development and provided for commentary on key technical matters including Natural Environment, Traffic and Parking, Phosphorus, Renewable Energy and other general comments on the proposal.

3.5 An Environmental Impact Assessment (EIA) Screening Request was made on 17 October 2024 with the Council providing a Screening Opinion on 20 November 2024. This confirmed that the Proposed Development do not fall within Schedule 1 or 2 of the EIA Regulations. Therefore, an Environmental Statement was not required.

3.6 Separately, Carter Jonas have liaised with WCBC to agree viewpoints for assessment within the Landscape and Visual Impact Assessment. A response from WCBC was received on 21 November 2024 and further commentary is provided within that document.

3.7 The proposed development has evolved, and comments on the pre-application advice received have been considered. This is reflected in the submitted Design and Access Statement and reported in the technical assessments which support this application

4.0 PROPOSED DEVELOPMENT

4.1 This chapter provides a summary of the proposed development, including the use and accommodation schedule, scale and massing, access, and landscaping strategy.

Description of Development

4.2 The description of development is as follows:

Full Planning Application seeking:

"Demolition of existing structures, site clearance and preparation works, and erection of new employment facilities (Use Class B2 and B8) with ancillary office accommodation (Use Class B1a), landscaping, car and cycle parking, access arrangements, and other associated works"

4.3 A summary of the proposed development is provided below. This section should be read alongside the submitted plans and Design & Access Statement.

Proposed Uses

4.4 The proposals include a range of uses, including Use Classes B2 and B8 floorspace, including ancillary office space (Use Class B1a), car parking, cycle parking, and landscaping.

4.5 The proposed development comprises:

- Demolition of all existing structures, site clearance, and preparation works, including removal of vegetation and reprofiling of topsoil, where necessary;

4.6 Construction of a warehouse unit comprising 14,564 sq. m of floorspace for B2 (general industrial) and/or B8 (storage and distribution) with B1(a) (ancillary office space).

- Access and parking provision, including new access junctions, internal roads, and car parking. 146 car parking spaces are proposed.
- 30 cycle parking spaces within an external cycle store.
- Retention and enhancement of some existing on-site green spaces and provision of landscaping around the detailed component of the application; and
- Implementation of drainage measures and ancillary infrastructure, including a substation and traffic management / security measures.

Scale and Massing

4.7 The Proposed Development comprise a building with a maximum height to ridge of 26m and an approximate external footprint of 98m x 125m.

4.8 The building's scale and massing are not unusual within this part of the Wrexham Industrial Estate, particularly noting the Site's proximity to other buildings of similar scale. The most notable is the Kelloggs facility to the east which includes elements that reach a height of approximately 40m. In addition, adjacent to the west is the Wockhardt complex which reaches a height of approximately 25m.

4.9 Paragraph 2.9 explains the emerging Utopia City proposals to the north of the Site. These include proposes buildings with a range of heights. Outline planning permission is sought for buildings of 20m to ridge and 28.5m to ridge. Full planning permission is sought for units with heights ranging from 8m to 18.5m.

4.10 The scale and massing have been influenced by meeting likely occupier demand. NWS's current objective is to occupy the building themselves with a manufacturing and storage use to support their wider operations, noting that equipment needs may change over time and having a large space to accommodate a range of plant is important to support business continuity.

4.11 Similarly, the building has also been designed to accommodate a logistics use. The modern logistics warehouse is increasingly technology focused. High-reach automated cranes and sophisticated warehouse management systems (WMS) are being utilised to maximise storage capacity. Certain manufacturing pallet racking systems exceed heights of 40 metres, although various systems reach lower heights more consummate with the Proposed Development, and these are becoming more common, reflecting the broader trend of increasing warehouse heights and capacities.

Layout

4.12 The site layout has been informed by a review of opportunities and constraints. Most notably, the presence of land proposed for use as part of the Wrexham Industrial Estate's Strategic Ecological Network along the southern and eastern perimeter of the Site. Land around the eastern and southern perimeter of the Site has been retained for this use. In addition, dense vegetation and tree cover at the northern boundary at Bryn Lane has been retained.

4.13 A car park and drop-off, supported by internal circulation roads has been included at the front of the building. Associated structures including a substation and cycle store are provided, alongside a dedicated amount of landscaping for occupants.

4.14 A full vehicular route around the perimeter of has also been retained. The eastern road provides access for HGVs and refuse vehicles from the main site entrance off Bryn Lane to the service yard at the rear. The western road includes car parking and allows access to car parking spaces in the rear yard. This allows provides full building access for fire services.

4.15 The remainder of the site comprises the main building, which is set back from the main road and sits centrally within the plot, maximising distance from neighbours as far as possible. This set back creates an efficient layout where development and ecological requirements are balanced on the site, whilst allowing for reduced visual impact from views into the site.

4.16 The building layout comprises a warehouse/manufacturing facility occupying most of the ground floor which is serviced via the rear of the building via various loading bays. This space is effectively a void which occupies the remainder of the building up the roof.

4.17 The exception is space across ground, first, and second floor which is occupied by the ancillary office elements. These uses occupy a small footprint in the north-western corner.

4.18 The main entrance and circulation lobby for the building is located at ground floor, accessed from the north elevation. A connection is possible into the warehouse use from the rear of the lobby.

4.19 Ancillary office facilities at ground floor including meeting rooms, a canteen, toilets, and cycling/showering facilities. A central staircase leads up to the first and second floor, alongside a lift.

4.20 The first and second floors are also occupied by ancillary office uses. These include meeting rooms, offices, workstations, and toilets.

4.21 The roof will include an access point for maintenance and a zone for Solar Panels to support BREEAM requirements and provide a renewable energy source for the development.

Appearance

4.22 The design philosophy for the building's external appearance aimed to blend modern high-end office and industrial aesthetics, aligning with the existing built environment and site character. The basis for external elevation material sections were:

- Utilising modern, industrial-grade materials reflecting the surrounding buildings' character.
- Incorporation of flat and profiled cladding systems and glazed fenestrations as a primary material for walls and roof, enhancing the modern industrial design aesthetic.
- Inclusion of a feature rainscreen canopy projection at glazed fenestrations to create a contemporary frontage.
- Selection of robust, low-maintenance materials ensuring long-term durability and good weathering performance.
- Design of heights and proportions to match the industrial scale of the proposed facility's development footprint.
- The colour palette predominately includes various shades of dark and light grey, with yellow uses to create contrast and draw attention to key features.

4.23 The principle northern elevation benefits from a metal-farmed curtain walling system with integral glazed entrance doors to the building, combined with a feature canopy surround in metal cassette rainscreen cladding. The elevation includes an amount of glazing for the office element, allowing for natural daylight to enter these areas and improve well-being within internal work-space environments. This high quality, contemporary approach is befitting a high-quality modern commercial/industrial development.

4.24 The southern elevation features the same primary materials for the walls and the overall design intention are carried through. This creates a coherent design which means the entire building presents positively. Various loading bays and service doors are included to allow for deliveries to take place.

4.25 In similar vein, the eastern and western elevation also feature the same primary materials for the walls and the overall design intention are carried through. The western elevation includes a small portion of glazed fenestration to support the office use.

4.26 The roof is concealed from ground level by hipped ends and a shallow parapet detail, adding visual interest. Lighter colours are utilised towards the top of the wall facades which softens skyline interruption

Access

4.27 The proposed development will be accessed by vehicles via the existing access of Bryn Lane. A new secondary pedestrian and cyclist entrance has been provided in the north-western corner of the Site, with the location seen as preferable as this represented the part of the northern boundary with the least dense vegetation cover.

4.28 As discussed above, vehicle circulation routes are provided through the Site allowing access to different areas for HGVs, emergency services vehicles, and cars as necessary.

4.29 The Proposed Development includes accessible design features such as Disabled Parking Spaces, drop kerbs, passenger lifts, and disabled toilets on all floors. Level access is achievable and will be designed to meet the relevant Building Regulations.

4.30 Recycled materials and general waste storage located within the yard ready for collection by specialist contractors. To enhance efficiency waste compactors are proposed.

Landscape

4.31 The landscape design approach occupies a unique position as it involves the integration of the proposed built form into the existing framework of the landscape. The wider site has a rich baseline of ecological and habitat assets that can be integrated with and enhanced over time. This can maximise the sustainable goals of the site and create a positive experience in terms of ecology and end users.

4.32 Key landscape design objectives include:

- Preserve existing valuable trees wherever possible on site, retaining trees continues a stable ecological element and a visual marker within the landscape.
- Protect and enhance land within the eastern and southern perimeter of the site to form part of the Wrexham Industrial Estate Strategic Ecological Network, as set out within planning policy. Within this, locate key vegetation and water elements where they can connect most effectively with the wider network. These have been designed generously, providing a corridor with a minimum width of 14m raising up to 33.5m.
- Strengthen the boundary planting to ensure that the current visual envelope is retained and weaker areas are improved.
- Ensure good maintenance of existing hedgerows and creation of new hedgerows within the new layout to link them together to create valuable habitats and wildlife corridors for all form of birds and mammals.
- Strengthening wildlife corridors – managing waterside vegetation, increasing wildflower potential, mosaic grasslands, rainwater harvesting, pollinator plants in car parks. A range of grassed areas can provide an array of species for habitat creation and foraging. Semi-improved

neutral grasslands, wildflower meadow species, verges with rough species rich together with perennials and ruderal grasses contribute to a mosaic of habitats which can be considered for the Site.

4.33 Building from these objectives, the landscape design has the following character areas.

- **Site entrance** – the road layout has been specifically designed to maintain notable, high quality mature trees near the entrance. Additional trees and layered scrub/thicket mix planting provide screening to integrate the existing planting in this area. Some ornamental planting and meadow grass to the thicket edge has been provided to indicate the entrance and work with Boundary Hedgerows.

- **Car park and front of building** - the car park area has limited planting to ensure safe visual corridors but also delineate crossing points and parking bay end points. Ornamental grasses and evergreen low hedges combine with fastigiate habit trees to soften the hardscape elements. Limited ornamental planting, species rich grasslands and a small tree group aim to soften the building form at the edges of the car park.

- **Northern boundary** – existing vegetation tapers off to the north-western corner which is why the pedestrian pathway access and cycle shelter are located here. The proposal is to increase the native buffer planting to ensure that screening is maintained in this area. Similar with the substation location, localized scrub / thicket planting will be planted to continue the screening following installation.

- **Eastern boundary** - part of the strategic ecological network and has features such as ditches, scrub and tree planting. To improve the network, additional planting has been suggested to further boost the vegetation in the area where some gaps and weaker areas exist. Wildflower grasslands border the higher planted areas allow a maintained edge during establishment period and beyond. Layered planting using smaller whip species mixed with larger trees on a grid basis ensure that a variety of native species are planted.

- **Southern boundary** – contains the existing stone lined drainage channel and managed buffer planting. The proposals suggest increasing scrub/thicket planting to the north of the channel to infill the gaps within the existing planting. These would include scrub and tree planting to link with existing trees, allow for a much stronger habitat and screening element rather than the fragmented and isolated planting that currently exists. ‘Hibernacula’ (log piles) will be installed at various locations along all boundaries to complement the current habitat creation strategy. This area is an important part of the Strategic Ecological Network watercourse corridor and with this in mind, an additional wildlife pond has been designed to acts as a potential link between the channel and nearby wet ditches.

- **Western boundary** - this area currently has no existing planting and a steel security fencing is dominant along this stretch. The proposed design would deliver a native hedge with additional hedgerow trees to screen the fencing and with species rich grass margin to provide a linking habitat corridor on this edge.

4.34 A total of 84 new trees are provided, compared to 2 lost, and 159 linear metres of new hedgerow is proposed, with no existing hedgerows lost across the Site.

5.0 PLANNING POLICY FRAMEWORK

5.1 The provisions contained within Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 require applications for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.2 The Development Plan for this site consists of the adopted Wrexham Local Development Plan (LDP) (adopted December 2023) and Future Wales: The National Plan 2040 (adopted February 2021). Other relevant material considerations include Planning Policy Wales (edition 12, February 2024) and other relevant local planning guidance notes and technical advice notes.

Legal judgements

5.3 Producing the LDP took many years, before being found “sound” by the Planning and Environment Decisions Wales (PEDW) on 27 February 2023. WCBC then subsequently voted not to adopt the LDP on 19 April and 14 June 2023.

5.4 A Judicial Review (JR) of those decisions was lodged by a consortium of developers (not including the Applicant) and heard by the High Court in November 2023. At this, these decisions were quashed and the Council were directed to adopt the LDP, which WCBC did in December 2023.

5.5 On 31 January 2024, a JR was launched into the High Court decision with a hearing taking place in October 2024. The judgement (“the Court of Appeal Decision”) was handed down on 20 December 2024 and subsequently the Welsh Government applied to the Supreme Court in January 2025 to be allowed the opportunity to appeal. No decision has been made on this application at time of submission. In tandem with the above a second legal challenge was lodged under Section 113 of the Planning and Compulsory Purchase Act 2004 (PCPA) (“the Section 113 Case”). This seeks to quash the LDP; however, this case had been halted waiting for the outcome of the Court of Appeal Decision, with no decision at time of submission.

5.6 Therefore, currently, the LDP remains an adopted document and remains relevant for decision-making in Wrexham. However, should the Section 113 legal challenge be successful, the Unitary Development Plan 2005 would likely become the relevant Development Plan Document for Wrexham. For completeness, this Statement considers the UDP alongside the LDP.

Wrexham Local Development Plan (LDP)

5.7 The Wrexham LDP is the planning policy document for the County Borough of Wrexham. It sets out key policies and land use allocations that will shape the future of Wrexham and guide development up to 2028. The Wrexham LDP replaces the previously adopted Wrexham Unitary Development Plan.

5.8 The LDP provides a spatial framework underpinned by the principles of sustainable development. It also provides a policy framework that integrates social, environmental, and economic issues relevant to the people who live, work, and visit the County Borough of Wrexham.

5.9 The following are considered to be relevant policies within the LDP:

- **Strategic Objective 2:** Support a vibrant, diverse, and competitive local economy that provides a range of job opportunities and enables new and existing businesses to grow in Wrexham County Borough with strategic growth in Wrexham City and Wrexham Industrial Estate and take advantage of its strategic accessible location within the wider North East Wales and North West England market region

- **Policy SP2**: Location of new development: New development is to directed within defined settlment limits and employment areas as identiiefed on the proposals map.

- **Policy SP5:** Planning obligations. Planning obligations will be sought to mitigate any impacts directly related to the development and will be assessed on a case-by-case basis in line with relevant planning legislation.

- **Policy SP8:** Economic growth employment and enterprise. To ensure the continued role of the County Borough as a key economic driver in North Wales and the wider region, the Plan will diversify the local economy and widen the economic base.

- **Policy SP9:** Wrexham industrial estate. The County's Key Business Sector Are and will be the primary focus for new employment development over the pan period for Class B1, B2, and B8 employment.

- **Policy SP11:** Transport and accessibility. Wrexham's transport network will be developed in a safe, efficient, and sustainable manner. This will be achieved by restricting development that would have an unacceptable impact on the safe and efficient operation of the transport network.

- **Policy SP12:** Design principles and master planning framework. All development will be required to be of a high quality, sustainable design which makes a positive contribution to the creation of locally distinctive places.

- **Policy SP13:** Health and well-being. All development should seek to reduce health inequalities and provide opportunities for improving health and wellbeing.

- **Policy SP14:** Natural environment. Development will only be permitted where it seeks to protect, conserve, and enhance the natural environment including the strategic ecological network on Wrexham Industrial Estate.

- **Policy SP15:** Historic and cultural environment. Development will only be supported where it conserves, protected, and enhances cultural and heritage assets of the Borough and their settings, including archaeological remains.

- **Policy SP18:** Climate change. To mitigate against the effects of climate changes and adapt to its impacts, development proposals will need to demonstrate that they have taken into account measures set out.

- **Policy SP19:** Green infrastructure policy. Development will be required to maintain the extent, quality, and connectivity of multi-functional green infrastructure on or near a site and, where appropriate, to enhance it.

- **Policy DM1**: Development management considerations. Development must accord with or enhance the character and local distinctiveness of a site in terms of their siting, layout, scale, height, density, and landscaping.

- **Policy NE3**: Trees, Woodlands and Hedgerows. Development will only be permitted where it does not cause unacceptable harm to trees and hedgerows of significant public amenity, natural or cultural heritage value, or those that provide important ecosystem services.

- **Policy NE6:** Wastewater treatment and river water quality. 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 treatment of waste water.

- **Policy EM2**: Provision of sporting facilities for employees in business industrial and warehousing development

- **Policy T1:** Managing transport impacts. Development will be supported where it will facilitate increased journeys by more sustainable modes of travel, mitigate any significant adverse effects upon the transport network that arise from the Proposed Development, does not comprise the safe, effective, and efficient use of the highways network and does not have an adverse impact ton highway safety or create unacceptable levels of traffic generation, and will provide appropriate levels of parking and access arrangement.

- **Policy T2:** Active travel policy. New development will be supported where active travel is integral to the overall design of the scheme and makes a positive contribution to the place.

- **Policy RE1**: Development and renewable energy low carbon technology. Developers of key strategic sites will be required to incorporate schemes which generate energy from renewable and low carbon technologies, unless is not financial or technically viable to do so.

5.10 On 20 December 2024, a judgement was issued by the Court of Appeal concerning whether WCBC were legally obliged to adopt the LDP, concluding that it was not. The Welsh Government has sought leave to challenge this decision at the Supreme Court so the judgement cannot currently be considered final.

5.11 This judgement did not seek to quash the LDP remains an adopted document and remains the key document for decision-making in Wrexham. There is a second court case which seeks to quash the LDP, however this is still pending. However, regardless of this, the LDP (as found sound by a Planning Inspector at Examination) carries a significant amount of weight in decision-making.

Wrexham Unitary Development Plan (UDP)

5.12 For completeness, this Planning Statement also references policies from WCBC's Unitary Development Plan which was adopted in February 2005 covering a period from 1996 to 2011. This means that – if relied upon for decision-making, the UDP would be severely out of date. However, noting that WCBC may decide to do this, the Proposed Development has considered against the UDP.

5.13 The following are considered to be relevant policies within the UDP:

5.14 **Policy PS2 The Broad Location of Development -** Development must not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment.

5.15 **Policy PS4 The Broad Location of Development -** Development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car.

5.16 **Policy PS6 Employment** - Approximately 300 hectares of employment land will be made available for development between 1996 and 2011

5.17 **Policy PS8 Transport** - The transport network should be developed by providing an integrated range of travel options to and from principal residential, commercial, employment and education centres by making the best use of the existing road and rail network.

5.18 **Policy PS11 Biodiversity** - Priority will be given to proposals that enhance the biodiversity value of sites and support the creation of local nature reserves, ensuring the protection and enhancement of the land's natural conservation and landscape qualities.

5.19 **Policy GDP1 Development Objectives** – Development should be appropriately scaled, designed, and laid out to align with the site's characteristics while enhancing the appearance of the surrounding area.

5.20 **Policy EC4 Hedgerows, Trees and Woodland** – Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodlands, wildlife and other natural landscapes and water features.

5.21 **Policy EC6 Biodiversity Conservation** - Development within or near sites of biodiversity interest will only be permitted if it can be clearly demonstrated that the development's necessity outweighs the need to protect the site's intrinsic nature conservation value. If such development is approved, any damage must be minimised, and appropriate mitigation measures must be implemented.

5.22 **Policy EC11 Archaeology** – Development that would negatively impact the site or setting of a Scheduled Ancient Monument or an archaeological site of national significance will not be permitted. For non-scheduled sites of archaeological importance, development will only be allowed if an archaeological investigation has been conducted to assess the nature, extent, and significance of the remains.

5.23 **Policy EC13 Surface Water Run-Off** - Development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted.

5.24 **Policy E1 Employment Allocations –** Sufficient land will be allocated for employment development between 2001 and 2011 at Wrexham Industrial Estate.

5.25 **Policy CLF Informal Recreation** – The existing pattern of public rights of way will be protected, maintained and improved and any potential new routes will be identified and safeguarded.

5.26 **Policy T8 Parking** - Development granted planning permission will be required to provide vehicle parking spaces either on site or nearby, in accordance with the Council's current parking standards.

5.27 **Policy T9 Walking, Cycling and Horse Riding Routes** - Development proposals must, where feasible and appropriate, include walking and cycling routes that connect to existing or planned networks and integrate seamlessly with the public transport system

Future Wales: The National Plan 2040

5.28 Future Wales: the National Plan 2040 is the national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

Planning Policy Wales

5.29 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which, together with PPW, provide the national planning policy framework for Wales.

5.30 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.

5.31 Relevant Technical advice notes (TANs) include:

- **TAN 5:** Nature conservation and planning (2009)
- **TAN 11:** Noise (1997)
- **TAN 12:** Design (2016)
- **TAN 15:** Development and Flood Risk (2004)
- **TAN 18:** Transport (2007)
- **TAN 23**: Economic Development (2014)
- **TAN 24:** The Historic Environment (2017)

WCBC Local Planning Guidance Notes

5.32 WCBC has approved a series of local planning guidance notes that amplify the Development Plan policy. The following Guidance Notes are considered relevant to this application:

- Landscape and Development (Local Planning Guidance Note NO.7)
- Cycling (Local Planning Guidance Note No.15)
- Parking Standards (Local Planning Guidance Note No.16)
- Trees and Development (Local Planning Guidance Note No.17)
- Landscape and Industrial Development (Local Planning Guidance Note No26)
- Wrexham Industrial Estate Employment and Nature Conservation (Local Planning Guidance Note No.29)
- Biodiversity and Development (Local Planning Guidance Note No.32)

6.0 PLANNING ASSESSMENT

6.1 This section will address the compliance of the proposed development with regard to the adopted Development Plan and other material considerations highlighted in the earlier sections. In terms of the proposal, it is considered that the principal issues relate to:

- Principle of development
- Design
    - Scale and Density,

      Architectural Design Quality
    - Place Making
    - Inclusive Design
- Ecology
    - Trees and Woodland
- Landscape strategy
- Landscape and visual impact
- Impact on residential amenity
- Noise
- Transport
- Heritage
- Flood Risk and Drainage
- Air Quality
- Utilities

Principle of Development

Policy and Guidance

6.2 LDP Policy SP2 (Location of New Development) states that development will be directed within existing defined settlement limits of existing employment areas as identified within the LDP policy map. The site is identified within the existing boundary of Wrexham Industrial Estate (Policy Map 3).

6.3 LDP Policy SP9 confirms that the Country's key Business Sector Area is Wrexham Industrial Estate, as shown on the LDP Policy Map. This policy will support schemes within the industrial estate for new employment development. This development of new high-quality employment space will attract new occupiers to the state and expand existing businesses in accordance with LDP Policy SP9.

6.4 LDP Policy SP8 ensures continued economic growth, employment, and enterprise within the County Borough and the wider region. The plan aims to do this by diversifying the economy and widening the economic base by expanding the Wrexham Industrial Estate by 28ha.

6.5 Future Wales Policy 20 seeks to support growth and investment by focusing development in National Growth Areas. These areas are identified as Wrexham and the Wrexham Industrial Estate, Broughton, Buckley, Deeside, and the Deeside Industrial Park. The proposed development aligns with the Borough and Wales' long-term economic strategy and would deliver on the Local Authority's regeneration aspirations.

6.6 UDP Policy E1 highlights Wrexham Industrial Estate as the key focus for growth and new employment development within the region to support economic growth and job creation.

6.7 Technical Advice Note 23, "Economic Development," provides guidance to planning authorities on economic development. The guidance encourages economic development to be delivered in the most efficient, sustainable, and generally appropriate location, which supports the region's future economic growth.

Compliance of the Proposed Development

6.8 The Proposed Development is located within an existing employment area identified to support continued economic growth, employment, and enterprise within the County Borough and the wider region within the LDP and UDP.

6.9 As demonstrated in LDP Policy SP8 and UDP Policy E1, there is a continuing demand to expand Wrexham Industrial Estate. This proposal seeks to create 14,564 sq. m (GIA) of employment floorspace to support and expand the existing business within the industrial estate and support growth and investment to the wider site as National Growth Area.

6.10 Noting the requirement of TAN23, the following observations are made noting that any 'harm to the environment' would be restricted to the loss of semi-natural grassland present within the Site:

- **Alternatives** – this Site is sequentially preference in planning terms being located within an existing employment area where the uses promoted are encouraged. Whilst the Site is now grassed over, at least part of it was previously developed and historically used for manufacturing purposes. Within the Wrexham Industrial Estate, there are few 'gap sites' which could be available. This restricts the potential for an alternate, "windfall" site to come forward where an environmental impact would be lesser. WCBC has a single employment allocation via the LDP – Land North of Bryn Lane – where planning permission is already being sought for a range of uses, in line with Policy SP10. Therefore, without granting planning permission it is reasonable to assume that this opportunity will be lost.
- **Jobs accommodated** – the scheme will deliver 238 FTE roles in operation, with further indirect jobs created in the supply chain. Furthermore, during the construction phase,

additional direct and indirect jobs will be created. This is a significant opportunity to increase employment opportunities within Wrexham.

- **Special merit** – the Proposed Development will support Council's strategic objective to deliver a Strategic Ecological Network through the Wrexham Industrial Estate, as envisaged through the LDP. The Site will include a landscaping scheme which improve its ecological value beyond its existing condition. This will include a Wildlife Pond – noting there are none currently on Site – that could support a Great Crested Newt population alongside hibernaculum. This will improve the Favourable Conservation Status of this important protected species.

Design (Architecture & Landscape)

Policy and Guidance

6.11 Planning Policy Wales sets out that good design is fundamental creation of sustainable places where people want to live work and socialise with design not just being about good architecture but about the relationship between all elements of the natural and built environment. Specifically, TAN 12 Design sets out the objectives of good design and there is a focus on collaboration of design.

6.12 UDP Policy GDP1 sets out how amenity of the public should be safeguarded. LDP Policy SP12 states that all development will be required to be of a high-quality sustainable design, which makes a positive contribution to the creation of locally distinct places, ensuring compliance with the specific master planning frameworks.

Compliance of the Proposed Development

6.13 The design of the Proposed Development is explained within Section 4 which covers both architecture and landscape architecture.

6.14 Overall, the Proposed Development has been designed with regard to the design-based policies strategy development plan and the PPW guidance on good design as well as all other material considerations.

Architecture

6.15 It is considered that the Proposed Development represents high quality architecture that will be in keeping with its location within the Wrexham Industrial Estate. As noted within Section 4, the design philosophy for the building's external appearance aimed to blend modern high-end office and industrial aesthetics, aligning with the existing built environment and site character.

6.16 Critically, the Proposed Development has been subject to design evolution prior to settling on the final configuration which forms this planning application. In summary, this process started with a multi-scheme on site prior settling on the single unit concept. Further work took place to understand constraints, including the Strategic Ecological Network, and to refine the approach to design elements alongside establishing a landscaping scheme.

6.17 In addition, a key driver behind the design is the desire to achieve BREEAM Excellent on the Proposed Development. This has informed the approach to internal and external design; for example, driving the inclusion on PVs on the roof.

Landscaping

6.18 The approach to landscape architecture is important for the Site, noting the presence of the Strategic Ecology Corridor within its boundaries. The Site's eastern and southern perimeters are a focal point for high quality, ecologically diverse landscaping treatment.

6.19 The landscape strategy prepared and submitted as part of this planning application sets out the effects upon the character of the Site and its immediate setting, and that of the surrounding published character. In summary, ecology corridors have been created as part of the extensive green infrastructure network, with trees and hedgerows retained where possible. Where it was not possible to retain existing features, replacements are proposed. Overall, a high-quality approach to landscaping has been achieved which maximises the use of existing features.

6.20 It is therefore considered that the landscape strategy conforms with the aims set out in the national and local policies in terms of enhancing biodiversity and preventing harm to existing features, with replacement planting seeking to mitigate any impacts where this is unavoidable.

Inclusive Design

6.21 The Proposed Development benefits from at-grade access and includes disabled car parking. Lifts and disabled facilities are included within the building, ensuring that access through the building is achievable by all.

Ecology (including Arboriculture)

Policy and Guidance

6.22 Ecology is considered in the submitted Ecological Impact Assessment produced by TEP. An Arboricultural Impact Assessment has been produced by Bowland Tree Consultancy.

6.23 There are three internationally designated wildlife sites within 10km of the site, these are Afon Dyfrdwy a Llyn Tegid (River Dee and Bala Lake) which is a Special Area of Conservation (SAC) in Wales and England and a Site of Special Scientific Interest (SSSI) and is 3.1km to the east of the site. The Midlands Meres and Mosses Phase 2 Ramsar site is 3.5km to the north west of the site. The Johnstown Newt Sites are also a SAC 8km to the south west of the site. In terms of national designations, there is the River Dee and Bala Lake SSSI, and also the Vicarage Moss SSSI which is 3.7km to the north west of the site, Sontley Marsh SSSI located 4.7km to the south west of the site and Marford Quarry SSSI located 5km to the north west of the site.

6.24 PPW requires developments to minimise impacts on ecosystems and to positively impact local biodiversity. Technical Advice Note 5 Nature Conservation and Planning is a key TAN in relation to nature conservation and biodiversity.

6.25 PPW includes several paragraphs (6.4.9 – 6.4.17) which explain the Stepwise approach.

6.26 PPW states that "*Planning authorities should protect trees, hedgerows, groups of trees and areas of woodland where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial and identified green infrastructure function"* (para. 6.4.25).

6.27 UDP Policy EC4 states that development proposals should incorporate the conservation and management of hedgerows, trees, and other landscape features, along with new planting, to enhance the character of the landscape. This is emphasised further by LDP Policy NE3 Trees, Woodlands and Hedgerows sets out that development will only be permitted where it does not cause unacceptable harm to "trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value or those that provide important ecosystem services." The policy continues to state that where adverse effects cannot be avoided, adequate mitigation will be required which will include new planting within the site.

6.28 UDP polices EC6, PS11 and LDP policies SP14, SP19 and NE3 detail the need to protect and enhance biodiversity. Harm should be kept to a minimum, and compensatory measures should be provided in instances where harm does occur.

6.29 LDP policy SP9 governs the Wrexham Industrial Estate and notes that land is protected on the estate for a strategic ecological network for a number of local, national and internationally protected species and habitat.

Compliance of the Proposed Development

6.30 This section covers the following elements: i) Ecology and Trees on Site, ii) Provision of the Strategic Ecological Corridor on-site, iii) Impact of Proposed Development and on-site mitigation, iv) the Stepwise Approach, v) Off-site mitigation, and vi) Overall conclusion

Ecology and Trees on Site

6.31 The Ecological Impact Assessment confirms that the Site is not within any Designated Sites, however it falls within the Afon Dyfrdwy SSSI Impact Zone. The scheme falls within a single Impact Risk Zone (IRZ) for the River Dee (England); however, the proposals do not meet any of the risk parameters identified for this IRZ,

6.32 In terms of flora, an extended Phase 1 habitat survey was undertaken on 8th November 2023 with an additional repeat survey undertaken in June 2024. TEP have produced a summary of key habitat features within the scheme:

Habitat Type ***(corresponding JNCC Phase 1 habitat type)***	**Area (ha) or length (m)**
Semi-improved Neutral Grassland	3.21ha
Scattered Broad-leaved trees	-
Hedgerows with trees (Species poor)	58m
Native species rich hedges and trees	152m
Tall Ruderal	0.01ha

Habitat Type *(corresponding JNCC Phase 1 habitat type)*	Area (ha) or length (m)
Scattered Scrub	0.15ha
Plantation	0.22ha
Buildings	0.02ha
Bare ground with ephemeral short perennial	0.05ha
Wet Ditch/Standing water	0.05ha

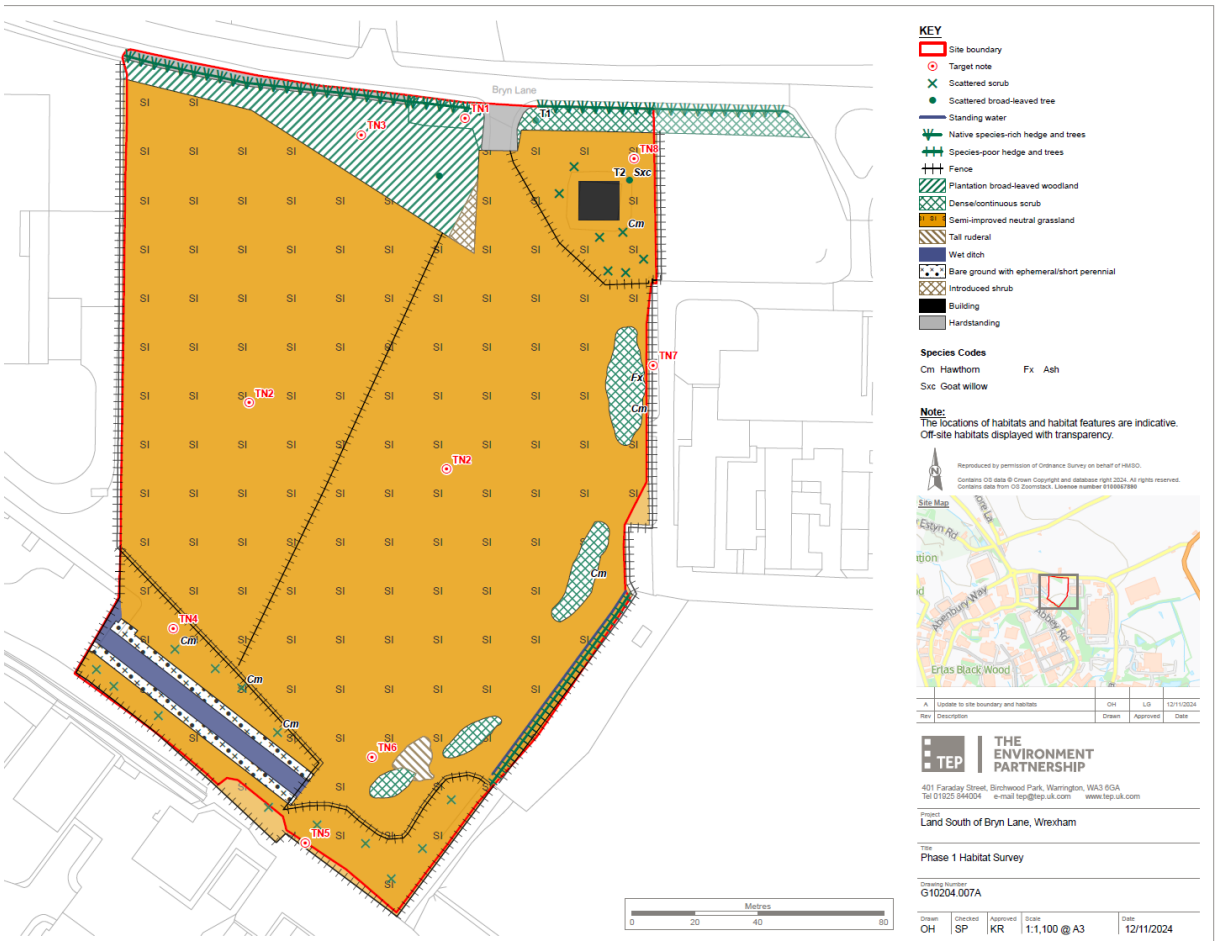


Figure 1 - Phase 1 Habitat Survey Plan

6.33 The above identifies that the Site is dominated by two large open, previously grazed semi-improved neutral grasslands, made up of common grasses. The remainder of the site comprises various forms of

woodland and hedgerows (species poor and native species-rich). An existing, sloped drainage ditch is located in the south-western corner.

6.34 There are no existing wildlife ponds on Site, although the Wrexham Industrial Estate's status as home to an important population of Great Crested Newts (a protected species for whom the protection of their Favourable Conservation Status is important) is noted.

6.35 The survey did identify the presence of New Zealand Pygmyweed and it is proposed that a further survey take place prior to commencement of development to establish whether this has spread and if mitigation is required.

6.36 In terms of fauna, the aforementioned Phase 1 habitat survey identifies parcels of trees and scrub that have potential for foraging birds, located in east, south and west. The site walkover did not identify any notable species on-site (including no recordings of bats, amphibians – including Great Crested Newts, hedgehogs, badger setts, or birds). The habitat on-site is not considered to be suitable for significant invertebrate populations such as the Dingy Skipper. No evidence of reptiles was noted at the site during the Phase 1 habitat survey.

6.37 However, there is potential for amphibians ranging, badgers foraging (but not breeding), and for bats, nesting birds, reptiles, and hedgehog to be present within the site.

6.38 When specifically considering Great Crested Newts (GCN), TEP note that the nearest record of GCN was 100 metres northeast; however, these ponds have Bryn Lane acting as a barrier to movement. There is no confirmed breeding onsite as an Edna survey carried out in 2024 by a licensed TEP ecologist resulted in a negative result. There is connectivity to the ponds further south, however the nearest ponds that have records of GCN are over 500 metres from the site boundary.

6.39 When considered as a whole, the eastern and southern boundaries of the site, contains optimal terrestrial habitat for amphibians with foraging and resting opportunities and connectivity to the ponds in the wider landscape to the south. If there is to be loss of terrestrial grassland habitat, there will be minimal implications with regards to the proposals and amphibians.

6.40 The Arboricultural Impact Assessment produced by Bowland Tree Consultancy was informed by a site visit in January 2024. This has identified 12 individual trees and eight groups of trees on Site. Of these, a single tree was deemed to be Category A (High Quality) with a further 3 trees and 2 groups of trees deemed to be Category B (Moderate Quality). No trees were deemed to be Veteran Trees and it is assumed that the Site is not subject to any Tree Preservation Orders.

Impact of the Proposed Development and on-site mitigation

6.41 The Proposed Development will occupy a significant portion of the Site, consummate to its role as a prominent gap site within the Wrexham Industrial Estate where planning policy protects and encourages employment use. However, additionally, a large portion of the Site has been given over to 'green space' which is ecologically valuable, noting the dual role that the Wrexham Industrial Estate has for wildlife and provisions within WCBC's LDP for delivering a Strategic Ecological Network. The Proposed Development facilitates this policy objective.

6.42 The submitted drawings illustrate the site layout which would lead to the loss of semi-improved natural grassland to facilitate development. However, a large portion of the prominent southern and eastern perimeter of the Site have been retained to contribute towards the Strategic Ecological Network which will include a Wildlife Pond that is suitable for GCN (a net gain compared to the existing situation) alongside hibernculas across the Strategic Ecological Network.

6.43 In addition, the Site's western and northern boundaries also have ecological value. Together, this land comprises a substantial "green space" within the Site and is a significant contribute towards mitigating any ecological harm.

6.44 The "development site area" – comprising the red line boundary minus the pavements on Bryn Lane and road access" – is 3.68ha. The "green space" on site (which excludes any developable area, including the principal building, substations, cycle shelters, and footpaths within the site) covers 1.18ha. Noting WCBC and NRW's previous position on establishing a ratio for provision of "green space", this equates to a 32% on-site provision.

6.45 Overall, the Proposed Development represents an improvement from an ecology perspective including the delivery of the Strategic Ecology Network requires under WCBC's LDP. This represents an improvement in quantum of ecologically valuable land on Site and in terms of quality.

6.46 In addition, the Ecological Impact Assessment produced by TEP proposes the following mitigation measures:

- Biosecurity measures should be implemented including washing and disinfecting of footwear, tools, and machinery, within a controlled bunded area, to ensure that invasive species and zoonotic diseases are not brought onto or spread across or offsite as a result of the works. Should a Biosecurity Risk Assessment be required then this can be secured via Planning Condition.

- Bat boxes can be incorporated on suitable trees within the site.

- Precautionary working measures such as hand searches and staged vegetation clearance should be adopted to minimise the risk of harm or injury to reptiles during vegetation clearance. Measures should be outlined within a protected/priority species to ensure no harm or injury to reptiles if present on site.

Stepwise Approach

6.47 Planning authorities must follow a stepwise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for.

6.48 Biodiversity enhancement should be provided proportionate to the scale and nature of the development and that enhancement measures could include on site, locally relevant, habitat creation and/or could be part of the development itself favouring the use of native species using biodiverse nature based solutions such as SuDS, green roofs, grassland management for wildflowers or reptile refugia, woodland expansion, and wetland creation.

6.49 The Site falls within the Wrexham Industrial Estate, a designated employment site where such growth is directed under adopted planning policy. Therefore, it is not practical or appropriate to Avoid (Step 1) development altogether.

6.50 The Proposed Development has sought to minimise impact (Step 2) on biodiversity and ecosystems through protecting land at the southern and eastern perimeters. This land is considered the most valuable habitat, supporting the potential for movement of species through the Site. This land forms part of the Site given over to the Strategic Ecological Network. In addition, existing trees and vegetation on the northern boundary with Byrn Lane have been protected and the site access has been specifically designed to avoid impact on higher quality trees.

6.51 Step 3 seeks to ensure that any damage to biodiversity and ecosystems is fully mitigated wherever possible. As noted above, the most ecologically valuable part of the Site has been protected and enhanced. The development of the Site (located within a designated employment area) will require the loss of semi-natural grassland which comprises common species. Paragraph 6.44 of this Planning Statement notes that 32% of the existing site is given over to 'green' uses which are ecologically valuable. This is a generous provision which balances economic development with ecological mitigation.

6.52 Step 4 considers mitigation. On-site mitigation includes the delivery of land to form part of the Strategic Ecological Network. In addition, the Proposed Development will deliver a new wildlife pond as part of this area. This represents a net increase in wildlife ponds – suitable for use by GCN – on the Site as there are none existing currently. This is considered a significant benefit in terms of biodiversity and will help maintain the Favourable Conservation Status of GCN. In addition, off-site mitigation is also proposed as part of a robust approach to ecology. This is outlined below.

Off-site mitigation

6.53 The Applicant has reflected on WCBC and NRW's previous position regarding an appropriate amount of ecologically value land as a ratio against the "development site area". Within the Wrexham Industrial Estate, on unallocated sites, the FI Real Estate "Kingsmoor" scheme has been referenced as a precedent delivering a 45% ratio.

6.54 The Applicant has engaged with WCBC and NRW on delivering an Eastern Strategic Ecology Corridor for the Wrexham Industrial Estate, as part of a holistic approach recognising their various land holdings and development aspirations in the area. Noting that the on-site provision is 33%, a further 0.5ha of off-site land would be required to meet the 45% ratio. This will be provided within the Eastern Strategic Ecology Corridor and include additional Wildlife Ponds suitable for GCN.

6.55 It is considered that the economic benefits from the Proposed Development, combined with its location within the Wrexham Industrial Estate (an existing employment centre) and the TAN23 justification presented earlier in this Planning Statement support an off-site solution, in addition to the proposed landscaping scheme.

6.56 A planning application identifying this land will be submitted and the Applicant is willing to accept a Grampian Condition or legal agreement requiring this land to be delivered.

Overall conclusion

6.57 The Ecological Impact Assessment and Arboricultural Impact Assessment demonstrate that the Proposed Development's impact on ecology and trees can be mitigated. The Proposed Development will deliver on a strategic objective for WCBC and NRW to create a Strategic Ecological Network through the Wrexham Industrial Estate.

6.58 The proposed landscaping scheme includes high quality, ecological value land throughout and includes a new Wildlife Pond suitable for GCN. An additional amount of ecological valuable land is proposed off-site. These measures allow the scheme to demonstrate adherence to the Stepwise approach.

6.59 Overall, the proposals represent an improvement on the site in terms of ecology and play an important role in delivering strategic ecological improvements that will support the Favourable Conservation Status of GCN.

Landscape and Visual Impact

Policy and Guidance

6.60 Environmental sustainability is a key objective of good design, as identified in PPW. This includes enhancing biodiversity.

6.61 LDP Policy SP14 and SP15 seek to protect conserve and enhance the natural environment and green infrastructure. In accordance with emerging Policy NE3, development will only be permitted where it does not cause unacceptable harm to trees, woodlands and hedgerows. If adverse impacts cannot be avoided, adequate mitigation will be required.

6.62 Chapter 3 of PPW covers strategic and spatial choices and at 3.3, it encourages good design to make better places. It states that good design is fundamental to creating sustainable places where people want to live, work and socialise. It further states that design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places.

6.63 Policies relating to the natural environment and landscape character are set out in Chapter 6: Distinctive and Natural Places of PPW.

Compliance of the Proposed Development

6.64 A Landscape and Visual Impact Assessment (LVIA) has been prepared by Nicholsons and submitted as part of this planning application.

6.65 The landscape impact assessment evaluated the influence on the character of the Site and its surroundings, as well as the broader character of the area. It determined that the proposed development would not cause any significant landscape impacts, with the most notable effect being a moderate to moderate/minor adverse impact on the character of the Site and its immediate surroundings.

6.66 A total of seven views were selected by Nicholsons as part of the visual impact assessment and presented as "wireline views". In agreeing the views with WCBC, officers enquired about whether an eight view from north-east of the NWS HQ building close to the junction of Ridleywood Road. Nicholsons consider that this is not required, as the Kelloggs factory and a whole range of other employment

buildings occupy the intervening space between the receptor and the site. It is considered that a significant effect would not be generated.

6.67 The Visual Impact Assessment indicated that the Site's visual environment is significantly limited to the west, south, and east due to the presence of tall vegetation and structures. However, broader views are accessible from receptors to the north, including users of public highways and Public Rights of Way.

6.68 However, the assessment concluded that none of the visual receptors would experience significant effects, the most significant being adverse effects of Moderate/Minor significance upon the users of public footpaths crossing agricultural land to the north. The LVIA report on the embedded mitigation which forms part of the scheme, including the retention and enhancement of existing vegetation and trees around the Site's perimeter. This is particularly for the northern boundary on Bryn Lane, where the existing trees are being retained.

6.69 Furthermore, any impact from these receptors would be significantly reduced through the delivery of the Utopia City scheme which occupies a large swathe of land to the north of the Site. This is subject to a live planning application which is pending determination and is an allocated site within the LDP, giving a high likelihood of delivery taking place.

Noise

Policy and Guidance

6.70 LDP Policy DM1 is clear that development must not have an unacceptable effect on the amenity of nearby properties by virtue of noise, disturbance, and overlooking.

6.71 PPW states in Paragraph 6.7.6 that any new developments must address impacts arising as a result of locations where there are sensitive receptors and not create inappropriate soundscape.

6.72 TAN11 states that development should not cause an unacceptable degree of disturbance and should reduce noise pollution and implement measures to mitigate noise levels from a development within the local area.

Compliance of the Proposed Development

6.73 A Noise Assessment has been prepared by Tetra Tech in support of the application.

6.74 The anticipated noise levels resulting from the proposed construction activities have been forecasted at nearby representative locations. This assessment aims to determine the highest external noise levels at neighbouring properties due to the expected construction activities related to the proposed development, and to evaluate whether the noise generated from standard operations will remain within these limits.

6.75 In summary, the assessment findings indicate that the proposed development's impact on nearby sensitive receptors is at most 3dB lower than the existing background levels. Therefore, it remains within the No Observed Adverse Effect Levels (NOAEL) relative to the relevant criteria and policy and noise levels do not surpass the measured background and are therefore considered acceptable. However,

Buildings Services Plant noise limits have also been suggested to ensure that noise levels do not exceed the measured background.

Transport

Policy and Guidance

6.76 Transport planning in Wales has a very strong focus on following an accessibility-led approach. This is developed from the national policies set out in Planning Policy Wales.

6.77 PPW identifies a series of objectives of good design relating to transport, including the following:

- Access: ensuring access for all;
- Character: sustaining or enhancing local character; promoting legible development, I successful relationship between public and private space quality choice and variety, innovative design; and
- Movement: promoting sustainable means of travel

6.78 TAN18 Transport guides in relation to the integration of land east planning and transport parking design access ability sustainable modes of transport and infrastructure development.

6.79 LDP Policy SP11 (Transport & Accessibility) and UDP Policy PS8 (Transport) sets out that the transport network will be developed in a safe, efficient, and sustainable manner by restricting any development that would have an unacceptable impact on its safe and efficient operation.

6.80 LDP Policy T1 sets out that development will be supported where it will facilitate increased journeys by more sustainable modes of travel, mitigate any significant adverse effects upon the transport network that arise from the proposed development, does not compromise the safe, effective, and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation, and provide appropriate levels of parking and access arrangements.

6.81 LDP Policy DM1 Development Management Considerations confirms that development proposals must prioritise walking, cycling and public transport ahead of travel by car.

6.82 LDP transport policies T2 (Active Travel) and T3 (Passenger Travel) emphasise the priority given to sustainable modes of travel. LDP Policy T3 states that in order to reduce the dependency on private cars, developments should enhance the promotion and marketing of public transport alternatives through Travel Plans. In accordance with this policy, a Framework Travel Plan has been prepared and submitted as part of this planning application.

Compliance of the Proposed Development

6.83 The Travel Plan submitted by Cora IHT outlines a comprehensive strategy for managing site access points while also encouraging sustainable and active transportation options. The primary objective of the travel plan is to decrease the number of journeys made by single-occupancy vehicles to and from the site. Initial target has been set to ensure that there is a commitment to achieve a 10% reduction in

the number of single occupancy car trips to and from the site. This will be achieved by implementing a set of initiatives aimed at promoting sustainable travel options and reducing dependence on cars.

6.84 Access to the site for vehicles is intended to be facilitated through the existing priority entrance located to the north of the site. This entrance will undergo improvements to enhance its capacity and functionality, specifically to accommodate vehicles, which require additional space for manoeuvrability. The proposed upgrades will ensure safe and efficient entry and exit for larger transport vehicles, thereby supporting the site's operational needs as required by Policy SP11 of the LDP, which states "*Restricting development that would have an unacceptable impact on the safe and efficient operation of the transport network"*.

6.85 A Transport assessment has been prepared by Cora IHT in support of the application. The transportation aspects concerning the development site are outlined, along with details of the development proposals. This includes an evaluation of anticipated traffic volumes, the resulting effects on the adjacent highway network, and considerations regarding accessibility and connectivity.

6.86 The planned car parking area is situated in the northwest of the site, adjacent to the main internal access road. The service area is positioned to the south, allowing HGVs and refuse vehicles to navigate along the internal access road on the eastern side of the main building. Additionally, there is a secondary route on the western side of the building that connects the car parking area and the service area, designated for emergency access and overflow parking.

6.87 A total of 146 parking spaces are being proposed, which includes 15 designated disabled spaces (accounting for 10% of the total provision) and 26 spaces equipped with electric vehicle charging stations. The car parking provision has been devised having had regard to WCBC's Parking Standards, noting that 146 car parking spaces relates directly to the policy requirement for a B8 use.

6.88 To provide comfort that the proposed car parking would be able to accommodate the likely demand, the Transport Assessment provides a provides the car parking accumulation assessment based on the agreed trip rates for B2 and B8 use respectively.

6.89 It can be deduced from the car parking assessment that the maximum demand would range between 58 (all B8) to 167 (all B2) spaces. As the application is for flexible use, there is a requirement for flexibility accommodating different end users or a mix of uses.

6.90 Even for the B2 calculation, the worst case might not reflect reality. For example, the potential for shift-working (depending on operator requirements) might reduce demand at any one time. Equally, "working from home" potential, a development since the car parking standards were produced, might lower demand for parking at any one time from the ancillary office element.

6.91 Ultimately, the potential for car parking on site has been maximised whilst not allowing for an overprovision which, in turn, encourages the use of sustainable transport modes. In addition, it allows for a large footprint building that creates the fullest employment benefits possible on a rare vacant, gap site in the industrial estate.

6.92 A parking facility for 30 bicycles is planned next to the pedestrian and cycling path leading into the site. This bike parking area will be situated within the car park, conveniently near the building entrances to promote usage and improve security adhering to "Maximising Parking Standards" in Technical Advice Note 18: Transport.

6.93 When assessing the proposed development's impact on the local highway infrastructure, the effect will be minimal compared to projected background 2030 levels and the proposed Bryn Lane site access junction would operate well within capacity.

6.94 The Transport Assessment concludes proposals are acceptable in highways and transportation terms and supported by both Planning Policy Wales and the relevant Technical Advice Notes.

Heritage/Archaeology

Policy and Guidance

6.95 The Planning Policy Wales (PPW) 2024 outlines the national planning policy framework regarding the historic environment, further supported by Technical Advice Note 24 “The Historic Environment” (2017). Chapter 6, titled "Distinctive and Natural Places," of PPW emphasises the significance and value of the country's unique historical character.

6.96 Chapter 6 states *“special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for historic, scenic, aesthetic and nature conservation reasons*”

6.97 Paragraph 6.1.9 states that “*Any decisions made through the planning system must fully consider the impact on the historic environment103 and on the significance and heritage values of individual historic assets and their contribution to the character of place”*

6.98 Paragraph 6.123 states *“The planning system recognises the need to conserve archaeological remains. The conservation of archaeological remains and their settings is a material consideration in determining planning applications, whether those remains are a scheduled monument or not”*

6.99 Technical Advice Note (TAN) 24 complements the guidance outlined in the Planning Policy Wales (PPW) by focusing on the historic environment. It offers direction on how development plans and planning decisions should take into account historic assets.

6.100 UDP Policy EC11 states that development which would directly affect the non-scheduled sites of archaeological importance will only be permitted if an archaeological investigation has been carried out to determine the extent and significance of the remains.

6.101 LDP Policy 16 indicates that development will be supported if it protects, conserves, preserves, or enhances the cultural and historical assets of the county borough along with their surroundings.

Compliance of the Proposed Development

6.102 The proposed development is supported by a Historic Environmental Desk-Based Assessment prepared by The Environmental Partnership and is submitted in support of the application.

6.103 The baseline assessment indicates that the 1km Study Area includes a singular historic asset: a Grade II listed farmhouse situated approximately 560 meters northwest of the proposed development site. Given the distance between the proposed site and this historic building, there will be no impact on the designated asset.

6.104 It is determined that the likelihood of undiscovered historic assets with archaeological significance is low.

6.105 The assessment also considered the impact of the development on a number of recorded historic assets. This assessment considers that the proposed development site will not impact the settings of any historic assets within the study area.

6.106 However, on the findings from the trial trench evaluation, consultations with Heneb - Clwyd-Powys Archaeology have determined that a targeted strip, map, and sample excavation should be conducted on the site of the former factory before any development takes place. This archaeological work is advised in line with paragraph 6.1.27 of PPW (2024), TAN 24, and policy SP15 of the Wrexham Local Plan (2023).

Flood Risk and Drainage

Policy and Guidance

6.107 Paragraph 6.6.25 of the PPW states that development should reduce and must not increase flood risk. LDP Policy SP19, Climate Change, states that to mitigate the impacts of climate change, development proposals will need to demonstrate that they avoid areas susceptible to flood risk in the first instance, in accordance with the sequential approach set out in national guidance. Development which would increase flood risk will be prevented. The potential effects of climate change should be assessed when preparing a Flood Consequence Assessment for development sites.

6.108 UDP Policy EC13 is clear that development which could result in unacceptable adverse impacts on the water environment due to additional surface water run-off will not be permitted.

6.109 LDP Policy DM1 (Development Management Considerations) states that development proposals must not increase the risk of flooding but make adequate provisions for sustainably dealing with foul and surface water drainage and not result in an unacceptable impact on the water environment.

6.110 TAN 15 “Development, flooding and coastal erosion” provides technical guidance that supplements the policies set out in PPW in relation to flooding and coastal erosion. It provides a framework within which the flood risks arising from rivers, the sea and surface water, and the risk of coastal erosion can be assessed.

Compliance of the Proposed Development

6.111 A Flood Consequence Assessment (FCA) has been prepared by Hilson Moran in support of the proposed development. This document highlights all the possible sources of flooding that may affect the area, including fluvial, pluvial, groundwater, sewer and reservoir flooding.

6.112 The Flood Map for planning has identified the site as located within Flood Zone 1 (Zone A), indicating that the site is low risk (less than 1 in 1000 years or 0.1% annual probability of flooding in any given year), from fluvial sources from both coastal and riverine flooding.

6.113 Certain parts of the site fall within Flood Zone 3 for surface water, indicating a potential risk of flooding greater than 1% in any given year. These areas are primarily located in the south, near the existing pond

and watercourse. Development in the southern section of the site will be limited, and much of the vegetation along the southern and eastern boundaries will be preserved to establish a Strategic Ecological Network around the perimeter of the site.

6.114 Based on the guidance set out in TAN15, the site is located in a Fluvial Flood Risk Zone A, indicating a low risk of flooding from fluvial sources. Consequently, the justification test is not required. Based on both local and national policy there is no further need to assess flood risk, making the development suitable in terms of flood risk considerations.

6.115 A Drainage Statement has been produced by Tier. The proposed development is 3.72 ha with a max impermeable area of 2.41 ha. The greenfield QBAR rate for the development area equates to 1.3 l/s based on the site area above. As such it is proposed to restrict peak surface water flows to 1.3 l/s off site.

6.116 A hierarchal approach has been taken to surface water drainage. The ground infiltration testing has not been carried out on the site at this stage. From the desktop study reviewing the BGS and soilscapes mapping, the ground conditions defined do not suggest that infiltration is achievable.

6.117 There is an existing watercourse along the southern and eastern boundaries of the site, however any connection to these watercourses are subject to agreement with WCBC to discharge flows from the development, although this is a last resort once all other options are exhausted. This is also noting potential conflict with the Strategic Ecological Network around the southern and eastern perimeter of the Site.

6.118 There is a possibility of a highway drain located to the north of the development on Bryn Lane. However, this has not been explored due to the topography of the site, which predominantly falls from north to south.

6.119 Noting the above, the proposed surface water drainage strategy will comprise the following elements:

- Surface water runoff from roofs, private drives and any adoptable highways, will drain via a piped network and an open swale to an attenuation facility which will provide attenuation storage (approximately 2200m3) for all flows up to and including the 1 in 100-year event plus 40% for climatic change.
- SuDS features, such as permeable paving and swales, will be incorporated into the surface water drainage proposals to aid in the mitigation requirements for water quality prior to discharging to the wider natural surface water drainage network. the proposals also include a petrol/ oil interceptor with an enhanced silt retention providing greater pollution mitigation indices.
- Other SuDS features have been considered, however due to the limitations of the site, they are deemed not suitable. Ponds were considered to be included in the Strategic Ecology Network, but the depths that could be achieved in the limited area was prohibitive. Ponds were also considered for attenuation; however, a priority was given to breeding ponds as there is a need for ecological improvement in this area. These ponds could not be considered in the drainage strategy

6.120 The foul flows from the development are proposed to connect to the existing public combined sewer that traverses the southern extents of the site. Other options were considered impractical. From previous discussions with Dwr Cymru Welsh Water (DCWW) on another project within the industrial estate, the feedback is that there is no capacity within the existing sewer network to accept any flows from any future development. However, officers also confirmed that individual Hydraulic Modelling was

not required for the Proposed Development and, instead, a solution for the Site could be captured within the wider proposals being considered from Utopia City (where Hydraulic Modelling has already been undertaken).

6.121 Historically, DCWW have suggested there is no intention to invest and upgrade the infrastructure within their current management plan. However, in November 2024, DCWW confirmed their intent to start a new five-year investment plan (AMP8). If approved, the company's plans for the five years from 2025-2030 will result in its biggest ever capital expenditure programme worth £4bn, with £2.5bn of that total invested to improve the environment. Ofwat approved AMP8 in December 2024.

6.122 The Applicant will engage with Welsh Water to establish a mutually agreeable option for Foul Water, noting that this issue impacts multiple schemes in the Wrexham Industrial Estate.

Air Quality

Policy and Guidance

6.123 PPW sets out the land use planning policies for a range of environmental considerations, including air quality. Chapter 6, Section 6.7 - Air Quality and Soundscape, provides a framework for addressing air quality and states that the planning system should maximise its contribution to achieving well-being goals, and in particular a healthier Wales, by aiming to reduce average population exposure to air pollution alongside action to tackle high pollution hotspots. PPW states that any new developments should address any implications arising as a result of its association with, or location within, air quality management areas or areas where there are sensitive receptors. Development should not create areas of poor air quality and should seek to incorporate measures which reduce the overall exposure to air pollution (para. 6.7.6).

6.124 UDP Policy GDP1 states that all new developments must protect the environment from negative impacts of pollution generated by the development, including air pollution.

Compliance of the Proposed Development

6.125 The proposed development is supported by an Air Quality Assessment prepared by Hilson Moran. This report outlines the results of the assessment, focusing on the potential air quality effects during both the construction and operational phases of the Proposed Development.

6.126 The proposed development has the potential to impact air quality due to road traffic exhaust emissions associated with vehicles traveling to and from the development during construction and operational use. An assessment was conducted to evaluate the existing conditions and gauge the potential impacts of the development, along with possible mitigation strategies.

6.127 Surrounding the application site the majority of receptors are places of employment, predominantly industrial in nature. These receptors are of medium sensitivity and there are estimated to be between 10 and 100 within 20m of the Application Boundary. There are no ecological receptors located within 50m of the Application Site, or within 500m of the likely construction traffic route and therefore consideration of these receptors has been scoped out for the assessment.

6.128 The potential risk of dust contamination from the proposed development to nearby existing receptors is considered to be medium for earthworks, construction, and trackout activities if no mitigation measures

are put in place. Conversely, the risk of human health impacts associated with these activities is assessed as low, again in the absence of any mitigation.

6.129 Overall, the residual impact is minimal however in line with Chapter 6 of the PPW and other material considerations, several essential mitigation measures should be integrated into the proposals including an 'air quality positive' design strategy. These measures should include sustainable transport initiatives like cycle parking, provisions for electric vehicle (EV) charging, and the use of all-electric systems for heating and hot water. Additionally, preserving the tree border along Bryn Lane will create a natural vegetation barrier, helping to reduce the influx of traffic-polluted air to the Proposed Development.

Utilities

Policy and Guidance

6.130 There is no relevant policy or guidance for this discipline.

Compliance of the Proposed Development

6.131 A Utilities Statement has been produced by Tier. The proposed development impacts on a number of the existing utility networks in the vicinity in a relatively minor way and involves straightforward "business as usual" type diversions to electricity, water and telecom networks to facilitate the development. All of these diversions have been confirmed as feasible by the relevant asset owners.

6.132 The development requires new incoming electricity, water and telecom supplies. All utility providers (electricity, water, telecoms) have been consulted and all have developed preliminary feasibility studies to confirm that they are able to provide new infrastructure and capacities to support the development.

6.133 The scheme has been proven, by the applicant's investigations up to planning stage, to be deliverable from a Utilities (electricity, gas, water, telecoms) perspective.

7.0 SUMMARY CONCLUSIONS

7.1 This Planning Statement has been prepared on behalf of Mauna Kea Limited to support a planning application for an employment development (B2 and B8) with ancillary office space (B1(a)), Landscaping and associated infrastructure at Land South of Bryn Lane, Wrexham.

7.2 The Site is located within the Wrexham Industrial Estate which is a designated employment site within Wrexham and an area which the Council wishes to direct employment growth through its Local Development Plan. The Proposed Development is supportive of this objective.

7.3 The Applicant's overall objective for the Site is to accommodate a range of uses, noting their business needs currently centre on providing space for manufacturing and storage. This is projected to deliver in the region of 238 FTE jobs in operation, with further direct and indirect employment opportunities during the operational and construction phases.

7.4 The Proposed Development represents high quality design both in terms of architect and landscape architect, presenting a modern industrial building which is in keeping with its location on the Wrexham Industrial Estate. The landscaping strategy retains and enhances existing features on site, including the creation of a new wildlife pond which will support wider ecological objectives on the Wrexham Industrial Estate.

7.5 The proposal is accompanied by a range of plans and technical reports to set out the proposals and address technical planning matters where relevant. The supporting information demonstrates that the proposed development is acceptable when measured against national and regional planning policies and guidance in the context of relevant material planning considerations.

7.6 This statement and the accompanying supporting information are considered to show that there are no material considerations that would be adversely affected by the proposed development.

7.7 As such, we consider that the proposal is acceptable when measured against relevant local, regional and national planning policies, and there are no material planning considerations that would support the refusal of the application. Therefore, we consider that the application can be supported, and we respectfully request that planning permission be granted.

Carter Jonas