

Chapter 1: Introduction

1. Introduction

1.1. Introduction

This Environmental Statement (ES) has been prepared to accompany a hybrid planning application to Wrexham County Borough Council (‘Wrexham CBC’) submitted by Net World Sports (‘the Applicant’), for a mixed-use commercial development at a site located immediately north of Bryn Lane and Wrexham Industrial Estate, Wrexham (centred on National Grid Reference (NGR) SJ 38557 51096) (the ‘application site’).

1.1.1. Scheme Background and Context

The application site is bound to the north by Francis’ Lane, to the east by existing field boundaries and a public right of way, to the south by Bryn Lane, and to the west by Hugmore Lane / Industrial Estate Road. There are a number of residential dwellings in the surrounding area, the closest of which are located along Hugmore Road, adjacent to the western boundary of the application site

The application site is located immediately north of Bryn Lane and Wrexham Industrial Estate. Wrexham Industrial Estate the UK’s second-largest industrial estate comprising an area of over 500 hectares (ha) and recognised as both a regionally and nationally important employment area. In this regard, the Applicant has identified the application site as an opportunity to bring forward a substantial amount of employment-generating floorspace and has recently built another development within the Wrexham Industrial Estate which was completed in December 2022 and comprises their headquarters(planning reference: P/2020/0167). The area beyond the application site to the north and east primarily comprises agricultural land.

The application site predominantly comprises agricultural land and occupies an area of approximately 37.21 ha, separated into eight fields by a mix of intact and defunct hedgerows lined with intermittent trees. The agricultural land within the application site is denoted under the Welsh Government’s agricultural land classification system as ‘Grade 3b – moderate quality agricultural land’. In the central southern part of the application site, there is currently a residential property and barn structures that are in use, with an access road connecting them to Bryn Lane, known as ‘Little Acorns’. Little Acorns is owned by the Applicant. There is also an additional residential property in the central northern part of the application site, ‘Honeysuckle Cottage’, which is also owned by the Applicant and accessed from Francis’ Lane.

Wrexham CBC is currently preparing their Local Development Plan (LDP) (1), a revised strategic planning framework which will set the planning requirements for achieving sustainable development in the borough and will set out where and how much new development will be targeted for delivery over the period 2013 to 2028. Once adopted, the LDP will replace the current Unitary Development Plan as the primary planning policy document against which Wrexham CBC will consider planning applications. Wrexham CBC has decided not to adopt the plan at this stage, however it remains a material consideration with significant weight, as it has been found sound by a Planning Inspector. The application site is proposed as an employment allocation under Policy SP11 of the emerging LDP, as allocation reference KSS3 ‘Land to the north of Bryn Lane, Wrexham Industrial Estate’. This policy recognises the application site’s potential to deliver approximately 28 ha of employment land for industrial or storage & distribution uses (use class B), including an ecological network, a residential buffer zone, and necessary infrastructure.

Development of the application site in line with the emerging allocation would contribute to Wrexham CBC’s ambitions to deliver its borough-wide spatial strategy and would ensure there is adequate employment provision at Wrexham Industrial Estate to meet existing and future demand.

The Applicant’s proposals for the application site comprise the demolition of all existing buildings, site clearance and preparation works, and the re-development of the application site for a commercial development comprising industrial/storage & distribution floorspace, as well as potential ancillary retail/drive thru facilities, a hotel and a petrol filling station. totaling up to 135,889 sqm gross external area (GEA) of floorspace, and associated access, servicing, car and cycle parking, landscaping and ecological mitigation (referred to herein as ‘the proposed development’). The full description of development as it appears on the planning application is as follows:

“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 (Use Class B1c/B2/B8) with 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) with ancillary (integral) office floorspace (Use Class B1a), ancillary retail and drive thru facilities, a hotel and petrol filling 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).”

1.1.2. Planning Documentation

This ES is one of a number of documents that have been submitted alongside the planning application. The full list of planning documents that have been submitted are listed in **Table 1.1.1.**

Table 1.1.1
Documents Submitted Alongside the Planning Application

Title
Planning Application Form
Covering Letter
Full suite of application drawings
Planning Statement
Environmental Statement
Design and Access Statement
Pre-Application Consultation Report
Energy Efficiency & Sustainable Development Report
Utilities Statement
Flood Consequence Assessment
Heritage Impact Assessment
Storm Water / SuDS Maintenance Plan
Shadow Habitat Regulations Assessment

1.1.3. Environmental Impact Assessment

Environmental Impact Assessment (EIA) is a systematic process for ensuring that the likely significant effects of a new development on its surrounding environment are fully identified and taken into account before that development is allowed to proceed. The aim of the EIA process is to provide the relevant decision maker (the ‘competent’ or lead authority’) with the information necessary to consider potential environmental impacts, to ascertain whether these are acceptable and to secure measures to mitigate any impacts likely to result in significant effects, or remove them completely, prior to granting relevant consents/permissions.

The purpose of Environmental Impact Assessment (EIA) is:

“to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process” (2).

1.1.4. Applicable EIA Regulations

The procedures for undertaking EIA for a development within the urban environment are set out within the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (3) (herein the ‘EIA Regulations 2017’).

1 Introduction

The EIA Regulations 2017 implement the requirements of EU Directive 2014/52/EU (4), which is an amendment of EU Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (5).

This ES has been prepared and submitted in accordance with the EIA Regulations 2017.

Under the EIA Regulations 2017, the proposed development is not Schedule 1 development, for which EIA would be mandatory. However, it is of a type listed within the descriptions of development contained within Schedule 2, falling under category 10(a) industrial estate development projects. A development is considered to be Schedule 2 development if any part of it lies within a ‘sensitive area’ or if it meets or exceeds the relevant thresholds and criteria for that category of development. The threshold/criterion for category 10(a) projects is as follows:

- i. The area of the development exceeds 5 hectares.

The proposed development does not lie within a sensitive area, as defined in the EIA Regulations; however, on the basis that the application site area (37.21 ha) exceeds the threshold criterion, the proposed development is considered to be Schedule 2 development and therefore falls within the scope of the regulations. Schedule 2 developments are considered to be ‘EIA development’ if they are likely to result in significant effects on the environment by virtue of factors such as their nature, size and location.

Given the scale and nature of the proposed development, the Applicant recognises that the proposed development is likely to give rise to significant environmental effects. As such, the Applicant has submitted this ES alongside the planning application to Wrexham CBC. No request for a screening opinion was submitted to Wrexham CBC.

1.1.5. The ES

The product of the EIA process is an ES. Regulation 2(1) of the EIA Regulations 2017 states that an ES has the meaning given by Regulation 17 which defines it as a statement that at least includes:

- a. a description of the proposed development comprising information on the application site, design, size and other relevant features of the development;
- b. a description of the likely significant effects of the proposed development on the environment;
- c. a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- d. a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;
- e. a non-technical summary of the information referred to in sub-paragraphs (a) to (d); and
- f. any additional information specified in Schedule 4 of the EIA Regulations 2017 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.

1.1.6. Structure of the Environmental Statement

The ES comprises the following:

- **Volume I: Non-Technical Summary (NTS)**, which contains a concise, accessible summary of the information contained in Volumes II and III, making it readily understandable to non-specialists;
- **Volume II: Main Volume of the ES**, which describes: the proposals, the alternative options considered, the baseline environmental conditions, the likely significant effects of the proposed development alone and in combination with the cumulative schemes, the proposed mitigation measures, and the residual environmental effects;
- **Volume III: Landscape & Visual Impact Assessment (LVIA)**, which, due to the size of the document, has been included as a separate volume, rather than as a technical chapter within Volume II; and
- **Volume IV: Technical Appendices**, which contains all of the technical reports that have informed the assessments reported within the technical chapters in Volume II.

The specified information in Schedule 4 of the EIA Regulation 2017 is replicated in Error! Reference source not found., which also indicates where this information has been provided within this ES.

Table 1.1.2
Specified Information within Schedule 4

Specified Information	Where Provided
1. Description of development, including in particular:	
a. a description of the location of the development;	Vol II, Ch 3
b. a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;	Vol II, Ch 4 & 6
c. a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;	Vol II, Ch 4, 7- 12; and Vol III
d. an estimate, by type and quantity, of expected residues and emissions such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.	Vol II, Ch 4, 6 – 12; &Vol III
2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the applicant or appellant which are relevant to the proposed development and its specific characteristics and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	Vol II, Ch 5
3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.	Vol II, Ch 7 – 12; & Vol III
4. A description of the factors specified in Regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.	Vol II, Ch 7 – 12; &Vol III
5. A description of the likely significant effects of the development on the environment resulting from, <i>inter alia</i> :	
a. the construction and existence of the development, including, where relevant, demolition works;	Vol II, Ch 6 – 12; &Vol III
b. the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;	Vol II, Ch 6 – 12; &Vol III
c. the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;	Vol II, Ch 6 – 12; ; &Vol III
d. the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);	Vol II, Ch 6 – 12; &Vol III

1 Introduction

Specified Information	Where Provided
e. the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;	Vol II, Ch 6 – 12; &Vol III
f. the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;	Vol II, Ch 6 – 12; &Vol III
g. the technologies and the substances used.	Vol II, Ch 6 – 12; &Vol III
The description of the likely significant effects on the factors specified in Regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the relevant environmental protection objectives established at European Union level or at national level.	Vol II, Ch 6 – 12
6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	Vol II, Ch 6 – 12; &Vol III
7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.	Vol II, Ch 6 – 12, 14; &Vol III
8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.	Vol II, Ch 6 – 12; &Vol III
9. A non-technical summary of the information provided under paragraphs 1 to 8.	Vol I
10. A reference list detailing the sources used for the descriptions and assessments included in the environmental statement.	Vol II & III (all chapters)

Source: EIA (Wales) Regulations 2017

1.2. The Consultant Team

This ES has been written predominantly by CBRE Ltd’s Sustainability, Impact Assessment & Social Value (SIASV) team, with specific inputs from sub-consultants on the technical chapters. It has been prepared based on information provided by the Applicant, the architect, landscape architect, the technical consultants, and the planning consultant.

In accordance with Regulation 17(4)(a) of the EIA Regulations 2017, this ES has been prepared by persons who have sufficient expertise to ensure the completeness and quality of the statement, in the opinion of the relevant planning authority or the Welsh Ministers. **Appendix 1.1, ES Volume IV** provides a statement setting out the expertise of the people who prepared the statement, in accordance with Regulation 17(4)(b) of the EIA Regulations 2017.

The members of the Applicant’s consultant team are listed in Table 1.2.1 and authors of the ES chapters and technical appendices are listed in Table 1.2.2.

As discussed in ES Chapter 2 *EIA Methodology*, Section 2.5 Public Consultation, statutory pre-application consultation was undertaken in accordance with the Planning (Wales) Act 2015. The consultation was undertaken for a period of 28 days following submission of the full suite of application documents on 19 June 2023. Where new or updated ES chapters and

appendices have been produced following this consultation period, this has been clarified in Table 1.2.2 using brackets next to the document name.

Table 1.2.1
Consultant Team

Role	Company
Applicant/Developer	Net World Sports
EIA Consultant	CBRE SIASV
Planning Consultant	CBRE Planning
Architect	Stephen George & Partners (SGP)
Landscape Architect	Nicholsons
Flood Risk & Drainage Consultant	Tier
Utilities Consultant	Tier
Energy & Sustainability Consultant	Synergy
Socio-Economics Consultant	CBRE SIASV
Transport Consultant	Cora IHT
Noise & Vibration Consultant	Tetra Tech
Air Quality Consultant	Redmore Environmental
Ecology, Biodiversity & Arboricultural Consultant	The Environment Partnership (TEP) / Rachel Hacking Ecology
Landscape & Visual Consultant	Nicholsons
Built Heritage and Archaeology Consultant	The Environment Partnership (TEP)
Ground Conditions/Land Contamination Consultant	Tier

Table 1.2.2
ES Chapter and Technical Assessment Authors

Chapter/Appendix	Title	Author
Volume I	Non-Technical Summary (updated)	CBRE SIASV
Volume II	Main ES Volume	CBRE SIASV
Chapter 1	Introduction (updated)	CBRE SIASV
Chapter 2	EIA Methodology (updated)	CBRE SIASV
Chapter 3	Application Site & Surrounding Area	CBRE SIASV
Chapter 4	The Proposed Development (updated)	CBRE SIASV
Chapter 5	Alternatives and Design Evolution	CBRE SIASV / Applicant
Chapter 6	Construction Strategy & CEMP	CBRE SIASV / Applicant
Chapter 7	Socio-economics	CBRE SIASV
Chapter 8	Transport (updated)	Cora IHT
Chapter 9	Air Quality (updated)	Redmore Environmental
Chapter 10	Noise & Vibration (updated)	Tetra Tech
Chapter 11	Biodiversity (updated)	The Environment Partnership
Chapter 12	Ground Conditions & Contamination	Tier

1 Introduction

Chapter/Appendix	Title	Author
Chapter 13	Intra-Development Cumulative Effects (updated)	CBRE SIASV
Chapter 14	Summary of Mitigation & Residual Effects (updated)	CBRE SIASV
Chapter 15	Glossary & Abbreviations	CBRE SIASV
Volume III	Landscape and Visual Impact Assessment	Nicholsons
Volume IV	Technical Appendices	
1.1	Technical Consultant CVs	EIA Consultant Team
2.1	EIA Scoping Report	CBRE SIASV
2.2	EIA Scoping Report Addendum	CBRE SIASV
2.3	Draft Scoping Opinion Email Correspondence	CBRE SIASV / Wrexham CBC
2.4	Formal EIA Scoping Opinion and Consultee Comments	Wrexham CBC & consultees
2.5	Cumulative Scheme Scoping Email Correspondence	Wrexham CBC
2.6	Statutory Pre-Application Consultation Consultee Comments (new)	Wrexham CBC & consultees
7.1	Socio-economics Baseline	CBRE SIASV
8.1	AADT Traffic Figures (updated)	Cora IHT
8.2	AAWT Traffic Figures (updated)	Cora IHT
8.3	Transport Assessment (updated)	Cora IHT
8.4	Framework Travel Plan	Cora IHT
8.5	Transport Assessment Scoping Report & Response	Cora IHT
9.1	Air Quality Impact Assessment (updated)	Redmore Environmental
10.1	Demolition and Construction Stage Noise Assessment (updated)	Tetra Tech
10.2	Completed Development Stage Noise Assessment (updated)	Tetra Tech
11.1	Consultation	TEP
11.2	Ecology Desk Study	TEP
11.3	Phase 1 Habitat Survey Technical Appendix	TEP
11.4	Arboricultural Impact Assessment	TEP
11.5	Hedgerows Regulations Assessment	TEP
11.6	Great Crested Newt Technical Appendix	TEP
11.7	Bat Roost Technical Appendix	TEP
11.8	Bat Activity Technical Appendix	TEP
11.9	Breeding Bird Technical Appendix	TEP
11.10	Winter Bird Technical Appendix	TEP
11.11	Lesser Silver Water Beetle Survey (updated)	TEP / Rachel Hacking Ecology
11.12	Bat Tree Roost Survey Technical Appendix (new)	TEP
11.13	Off-site Mitigation Drawings (new)	Nicholsons
12.1	Preliminary Risk Assessment (PRA) Report	Tier
12.2	Phosphate Assessment Technical Note.	Tier

1.3. Determination of the Planning Application

The Applicant has prepared and submitted to Wrexham CBC an electronic copy of the four volumes of this document that together constitute an ES under the EIA Regulations 2017. This has been discussed and agreed with the planning case officer.

Upon submission, Wrexham CBC will publicise the planning application in line with their statutory duty and it will be available to view on Wrexham CBC’s website:

<https://planning.wrexham.gov.uk/planning/search-applications>

In accordance with Regulation 18(3), once it has received the ES, the local authority shall:

- a. send to the Welsh Ministers within 14 days of receipt of the statement, one copy of the statement, a copy of the application and of any documents submitted with the application;
- b. inform the Applicant of the number of copies required to enable the authority to comply with sub-paragraph 3(c);
- c. forward to any consultation body, which has not received a copy directly from the Applicant, a copy of the ES and inform any such consultation body that they may make representations; and
- d. where the authority are aware of any particular person who is or is likely to be affected by, or has an interest in, the application and who is unlikely to become aware of it by means of electronic publication or site notice or by local advertisement, send a notice to such person containing the details set out in regulation 19(2)(b) to (k) and the name and address of the authority.

1.3.1. Determination Period

As per Regulation 18(1), Wrexham CBC shall not determine the EIA application until the expiry of 30 days from the last date on which a copy of the statement was served to any of the consultees. The determination must also be made after the expiry of 30 days from the display of the site notice, from the date of publication in the local newspaper and from the date of advertisement on the Council’s website (whichever is later).

In contrast to a non-EIA planning application, which should be decided upon within either 8 or 12 weeks of submission, those applications accompanied by an ES are to be decided within 16 or 20 weeks of submission respectively (Regulation 61(2)).

1.3.2. Copies of the ES & Comments on the ES

The ES and the planning application will be available to view and download at Wrexham CBC’s planning applications website:

<https://planning.wrexham.gov.uk/planning/search-applications>

For anyone without personal access to the internet, the documents can be viewed online at any of Wrexham CBC’s libraries through the computer/internet facilities available.

Comments on the planning application and ES should be addressed to Mr Matthew Phillips at the address below or may be made online via Wrexham CBC’s planning applications website.

Mr Matthew Phillips
Wrexham County Borough Council
Planning and Regulatory Service
Guildhall
Wrexham
LL11 1AY

1 Introduction

Paper copies of this ES can be obtained for £750.00 (to reflect printing and distribution costs) by contacting:

CBRE Ltd - Sustainability, Impact Assessment & Social Value
Henrietta House
Henrietta Place
London
W1G 0NB

Alternatively, an electronic copy of the ES can be obtained for £10.00 by contacting CBRE at the above address.

Charges for paper and electronic copies of the ES are made in accordance with Regulation 23 of the EIA Regulations 2017.

1.3.3. Alternative Formats

The text size used in this document has been chosen to cut down on the quantity of paper required in its production. A large text version of this document is available upon request. Please note that printing costs may vary from those stated above.

1.4. Works Cited

1. Council, Wrexham County Borough. Draft Wrexham Local Development Plan 2013-2028. 2023.
2. Department for Communities and Local Government. Planning Practice Guidance. Planning Portal. [Online] 2014. [Cited: 18 November 2014.] <http://planningguidance.planningportal.gov.uk/>.
3. Welsh Government. The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. Cardiff : s.n., 2017.
4. European Parliament & Council. Council Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment. 2014. 2014/52/EU.
5. —. Council Directive 2011/ 92/ The Assessment of the Effects of Certain Public and Private Projects on the Environment. 13 December 2011. 2011/ 92/EU.
6. ACME Inc. How to Insert Citations. London : ACME Inc., 2016.
7. HM Government. The Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020. London : s.n., 2020.
8. —. The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018. 2018.