

Appendix 2.2: EIA Scoping Report Addendum

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Matthew Phillips
Interim Head of Service Planning Policy
Wrexham Borough Council
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22 February 2023

By email

Dear Mr Phillips,

Land North of Bryn Lane, Wrexham Industrial Estate – Amended Request for a Scoping Opinion

We write to you on behalf of Net World Sports (the ‘Applicant’) regarding the proposed commercial development, including industrial and distribution, and ancillary retail/hotel floorspace, at a site north of Wrexham Industrial Estate, Wrexham (the ‘application site’).

A request for a scoping opinion under Regulation 14(1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (herein ‘EIA Regulations 2017’) was submitted to Wrexham County Borough Council (CBC) on 02 November 2022 (the ‘2022 EIA Scoping Report’) in respect of the proposed development. At the time of writing this letter, Wrexham CBC have not issued their scoping opinion and, based on the latest correspondence, it is understood this will be provided by 28 February 2023.

Since the 2022 EIA Scoping Report was submitted, the scheme designs have evolved and some minor amendments have now been made. The planning application type has also changed. The application will now seek hybrid planning permission, rather than outline permission.

This letter comprises an addendum to the 2022 EIA Scoping Report. This addendum, in combination with the original 2022 EIA Scoping Report, comprises an amended request for a Scoping Opinion, which has been submitted to Wrexham CBC under Regulation 14(1) of the EIA Regulations 2017 to confirm the scope and methodology of the EIA. It sets out the updated proposed development description, as well as a review of the scope and methodology presented in the 2022 EIA Scoping Report in the context of the recent scheme changes. This letter also provides an update, where relevant, in response to any pre-application discussions that have taken place since the 2022 EIA Scoping Report was submitted.

The amendments to the 2022 EIA Scoping Report are set out below. Where the commentary in the 2022 EIA Scoping Report has not changed or does not require further consideration in respect of the minor amendments,

these sections have not been repeated. Where minor amendments to the assessment approach and methodology are proposed, this is set out in the below sections.

2. Site Description & Development Proposals

Location of the Site

The red line boundary, as presented in the 2022 EIA Scoping Report, has been amended to include the three access points to the application site off the Bryn Lane/Industrial Estate roundabout and Bryn Lane. The updated red line boundary plan is shown in Figure 1.1. The total area of the application site is now 37.18 ha, an increase of 0.91 ha from that previously reported.

In respect of the application site conditions, the commentary in the 2022 Scoping Report remains largely valid. The additional land now included within the application site includes areas of publicly accessible highway as well as small areas of the adjacent verge, which comprises grasses and shrubs. This habitat is consistent with that described in the 2022 EIA Scoping Report; however, this will be confirmed via update surveys to capture this additional land, which will be reported in the Environmental Statement (ES) to accompany the planning application.

The Proposed Development

The Applicant now intends to submit an application for hybrid planning permission, comprising a detailed component (17.95 ha) and an outline component (19.24 ha), as shown in Figure 1.1.

Whilst it is noted that the amended proposals fall within the outline scheme maximum parameters set out in the 2022 EIA Scoping Report, the description of the development has been updated below to acknowledge the parts of the proposed development now being delivered in detail, as well as any other changes that have been considered when reviewing the technical scopes for the EIA.

The changes to the development description included in the 2022 EIA Scoping Report can be summarised as follows:

- Reduction in the maximum quantum of floorspace to be delivered from up to 160,000 sqm gross external area (GEA) to up to 150,000 sqm GEA;
- Of the total quantum of proposed floorspace, up to 82,600 sqm GEA will form the detailed component, which would comprise the construction of:
 - 1 large unit to deliver up to 43,500 sqm GEA B1c (light industry appropriate in a residential area), B2 (general industrial), and B8 (storage and distribution) uses;
 - Approximately 8 smaller units to deliver 39,100 sqm GEA B1c, B2 and B8 uses;
- Of the total quantum of proposed floorspace, 67,400 sqm GEA will form the outline component, which would comprise the construction of employment uses (B1c/B2/B8 use), ancillary retail/drive thru facilities and potential for a hotel and petrol filling station (A1, A3, C1 or *sui generis*). The overall quantum of A1, A3, C1 and/or *sui generis* use would not exceed 10,000 sqm GEA; and
- Cycle and pedestrian access would also be provided via the two new access points off Bryn Lane and the Bryn Lane/Industrial Estate roundabout and a separate cycle/pedestrian access point is no longer proposed.

The complete updated proposed development description for this amended request for a scoping opinion is as follows:

- Demolition of existing buildings, site clearance and preparation works, including removal of vegetation and reprofiling of topsoil, where necessary;
- Detailed Component:
 - Construction of a new warehouse unit, providing up to 43,500 sqm GEA of floorspace for B1c (light industry appropriate in a residential area), B2 (general industrial), and B8 (storage and distribution) uses (Unit 2);
 - Construction of approximately 8 new smaller industrial units, providing a total of up to 39,100 sqm GEA of floorspace for B1c (light industry appropriate in a residential area), B2 (general industrial), and B8 (storage and distribution) uses;
- Outline Component:
 - Construction of up to 67,400 sqm GEA of floorspace for B1c (light industry appropriate in a residential area), B2 (general industrial), and B8 (storage and distribution) uses, ancillary retail/drive thru facilities and potential for a hotel and petrol filling station (A1, A3, C1 or *sui generis*). The overall quantum of A1, A3, C1 or *sui generis* use floorspace would not exceed 10,000 sqm GEA;
- The proposed buildings will be up to 28.5m in height above ground level;
- Access and parking provision, including new access junctions, internal roads, service yards and car and HGV parking. Two new junctions are proposed providing vehicular access, as well as cycle and pedestrian access, from Bryn Lane/Industrial Estate Road. Up to 1,500 car parking spaces and up to 300 HGV trailer spaces and 15 HGV lorry spaces are anticipated;
- Retention and enhancements of some existing on-site green spaces and provision of landscaping around the site;
- Implementation of drainage/attenuation measures; and
- Off-site ecological enhancement including the relocation of ponds.

Given the proposed site access and main arterial internal roads are now located within the detailed component of the proposed development, access within the outline component is no longer proposed to be fixed. The outline component will therefore seek to reserve all matters associated with scale and massing; internal layout; appearance; access; and landscaping.

When considering the outline component of the proposals, the assessments reported in the EIA will be based on the following parameters:

- Development plots parameter plan, including maximum building heights;
- Maximum floorspace schedule; and
- Principles for the design of the development set out in the Design & Access Statement, which will be secured through subsequent reserved matters applications.

The detailed component of the proposed development will be defined by the following detailed plans, which will form the basis of the assessments of this part of the proposals:

- Detailed planning application drawings;
- Detailed floorspace schedule; and

- Detailed landscape strategy.

3. EIA Methodology

Approach to Technical Assessment of Parameters

The approach set out in the 2022 EIA Scoping Report remains valid with respect to the assessment of scheme parameters for the outline component. As noted in the section above, the basis of the assessments for the detailed component will be informed by the detailed plans and scheme information.

Cumulative Effects

The original list of cumulative schemes for inclusion in the inter-development cumulative assessment is set out in Table 3.6.1 of the 2022 EIA Scoping Report. In email correspondence with Matthew Phillips at Wrexham CBC on 16 December 2022, Matthew initially recommended that three cumulative schemes be considered in the EIA in addition to those listed in Table 3.6.1 of the 2022 EIA Scoping Report.

Upon review of these cumulative schemes and further correspondence with Matthew Phillips, it is considered that significant inter-development cumulative effects are not likely to arise in relation these three schemes for the reasons set out below:

- Wilkinson Business Park scheme, Clywedog Road South, LL13 9AE (P/2018/1087) was requested to be considered due to the sensitivity of the location from an ecological perspective. The project ecologists have reviewed the scheme and have confirmed that, based on the distance from the application site (approximately 2km southwest) and the presence of intervening development, there is unlikely to be any connectivity between the two sites. On this basis, no significant inter-development cumulative effects are anticipated in combination with the proposed development and as such it is proposed to be screened out of the cumulative assessment to be reported in the ES.
- Village Bakery scheme, Coed Aben Road, Wrexham Industrial Estate, LL13 9UH (P/2021/1189) was requested to be considered on the basis of it being an extant permissions for major development. However, given the scheme is approximately 1.4 km from the application site boundary and falls below the cumulative scheme criteria set out in the 2022 EIA Scoping Report, no significant inter-development cumulative effects are anticipated in combination with the proposed development and as such it is proposed to be screened out of the cumulative assessment to be reported in the ES.
- 11 Hill Street, Wrexham, LL14 1LN (P/2022/0652) was requested for consideration on the basis of it being for a large application on the industrial estate. However, on review of the application documents the scheme is for the development of three residential homes and falls well below the cumulative scheme criteria. Accordingly, no significant inter-development cumulative effects are anticipated in combination with the proposed development. Furthermore, we would not typically give consideration to schemes which are pending consent. As such, it is proposed to be screened out of the cumulative assessment to be reported in the ES.

5. Topics With Potential For Likely Significant Environmental Effects

Each technical topic specialist has undertaken a review of the proposed technical assessment methodology information set out in the 2022 EIA Scoping Report in the context of the recent proposed scheme amendments. In undertaking this review, the technical specialists have taken into account any changes in baseline conditions, the updated list of cumulative schemes, any recent updates to policy and legislation, and recent consultations with key stakeholders. Table 5.1 sets out the outcome of this review. Where changes to the assessment methodologies are proposed, full details on the updated methodology have been provided.

Table 5.1
Technical Assessment Scopes and Methodologies

Topic	Updates to Scope of Assessment
Socio-Economics	The proposed assessment methodology as presented in the 2022 EIA Scoping Report remains valid and unchanged, with one minor exception. This is with the exception that the relevant data from the recently released 2021 Census will also be used to establish the socio-economic baseline, in addition to the 2011 Census data which is referred to in the 2022 EIA Scoping Report.
Transport	The proposed assessment methodology as presented in the 2022 EIA Scoping Report remains valid. However, the following is noted: - Since the 2022 EIA Scoping Report was submitted, consultation has been undertaken with Wrexham CBC's traffic consultants, Mott MacDonald, in January 2023, to agree the assessment methodology and traffic data approach. Following a meeting with Mott MacDonald and the Applicant's Traffic Consultants, Cora IHT Ltd, on 11 January 2023, a Transport Scoping Note was issued by Cora IHT Ltd requesting a scoping opinion on the proposed scope and approach of the transport assessment to be undertaken and presented in both the transport ES chapter and Transport Assessment report which will form appendix to the ES. A response from Mott MacDonald is awaited at the time of writing this letter. - The 2022 EIA Scoping Report sets out that the transport assessment will identify, amongst other things, the year of assessment and additional traffic generated from the proposed development as part of the exercise in determining the assessment approach (See the section on Assessment Approach in Chapter 5). To provide more information, to ensure a worst case assessment, the year of assessment for the demolition and construction stage has been identified as the year of peak demolition and construction works in terms of vehicular trips / peak demolition and construction works combined with the early completed development phases. To provide flexibility around the phasing of the junction/highways works, it will also be assumed that 100% of the proposed development construction traffic is entering/exiting via both the access point on Bryn Lane as well as the roundabout.
Air Quality	The proposed assessment methodology as presented in the 2022 EIA Scoping Report remains valid and unchanged.
Noise and Vibration	The proposed assessment methodology as presented in the 2022 EIA Scoping Report remains valid and unchanged.
Biodiversity	As noted above, the application site red line boundary has been marginally amended and now includes some public highway and verges. Based on site walkovers/observations made during previous surveys, the verge habitats comprise mostly grassland and are considered to be of low ecological value. As such, the baseline conditions set out in the 2022 Scoping Report remain valid for the amended site red line boundary. This will be confirmed via update surveys to be undertaken to inform the biodiversity ES chapter. In respect of the assessment study area, also referred to as the Zone of Influence (ZoI), the 2022 EIA Scoping Report proposed a 1km radius from the application site boundary. However, as reflected in the Baseline Conditions section of the 2022 EIA Scoping Report, a much wider study area has been considered (e.g. the desk study considers international sites up to 10km from the site boundary). It is proposed that the ZoI for the purpose of the assessment will be identified on an individual ecological feature-by-feature basis based on the potential impacts of the proposed development, and the sensitivity of the ecological feature. In a pre-application letter from David Fitzsimon, the Chief Officer Economy and Planning at Wrexham CBC (dated 09 November 2022), concerns were raised with respect to the potential for the proposed development to increase phosphate emissions entering the River Dee and Bala Lake SAC. David Fitzsimon advised that measures should be put in place to mitigate any impacts of the

Topic	Updates to Scope of Assessment
	proposed development in this regard. The Applicant is in the process of undertaking consultation with the relevant consultees to further understand the concerns around phosphate emissions from the proposed development and explore potential measures, as required, to mitigate any likely significant adverse effects. For avoidance of doubt, the assessment methodology presented in the 2022 EIA Scoping Report remains valid and the potential for impacts from phosphate emissions on the SAC will be considered and reported in the biodiversity ES chapter. A Habitat Regulations Assessment (HRA) Report will accompany the planning application as a standalone report which will also consider any impacts on the SAC from the proposed development.
Landscape and Visual	The proposed assessment methodology as presented in the 2022 EIA Scoping Report remains valid and unchanged. Whilst it is acknowledged that a hybrid application is now being submitted, wireline visualisations are considered to remain appropriate and proportionate for the purpose of the assessment as they will enable the height and mass of the proposed development and its associated landscape and visual effects to be sufficiently understood for evidence-based professional judgements to be made. Given the proposals for an industrial development within an area of established industrial character, rendered visualisations are not considered to add any value to understanding the potential visual impacts of the proposed development. The visualisations will be based on the photographs taken during the update survey undertaken on 17 January 2023, using a selection of key viewpoints as determined by the field survey. The plan showing the selected viewpoints is provided in Appendix B.

7. Topics Where Potential For Likely Significant Effects are Not Anticipated

Historic Environment

Following submission of the 2022 EIA Scoping Report, Clwyd-Powys Archaeological Trust (CPAT) requested a copy of the Geophysical Survey Report¹ in order to provide feedback on the suggested Historic Environment scope. The Geophysical Survey Report was issued to CPAT on 02 December 2022. For avoidance of doubt, the commentary provided in the 2022 EIA Scoping Report remains valid and unchanged and it is still proposed that an assessment of effects on below ground archaeology be scoped out of the Environmental Statement but would be included within a stand-alone heritage impact assessment report to be submitted in support of the planning application.

Flood Risk and Drainage

As discussed in Table 5.1, Wrexham CBC have raised concerns around impacts from the proposed development relating to phosphate emissions entering the River Dee and Bala Lake SAC. In addition, in an email dated 23 November 2022, Welsh Water asked for an estimate of how many staff are anticipated to be employed on-site. Based on the latest design proposals, an estimate was provided to Welsh Water on 03 February 2023² and a response is awaited. The Applicant is in the process of undertaking consultation with the relevant consultees to further understand the concerns around phosphate emissions from the proposed development and explore mitigation, as required.

¹ The Geophysical Survey Report is mentioned under the Historic Environment commentary in Chapter 7 of the 2022 EIA Scoping Report.
² The estimated number of employees on-site could range between 1,185 and 3,120 based on the latest design proposals, using maximum floorspace parameters and job density assumptions as set out in relevant guidance.

However, as stated in Table 5.1, the impacts from phosphate emissions entering the River Dee and Bala Lake SAC will be assessed by the project ecologists and reported in the biodiversity ES chapter. The commentary provided in the 2022 EIA Scoping Report in respect of flood risk and drainage remains valid and unchanged. On this basis, it is still proposed that a discrete Flood Risk & Drainage ES Chapter is not considered to be required.

8. Summary and Conclusions

Amended Request for Scoping Opinion

Together, the 2022 EIA Scoping Report and this addendum letter constitute an amended request for a Scoping Opinion, under Regulation 14(1) of the EIA Regulations 2017.

In accordance with Regulation 14(3), should Wrexham CBC consider that they have not been provided with sufficient information to adopt a Scoping Opinion, they should notify the person making the request of the points on which they require additional information.

As per your email on 03 February 2023, we would be grateful if you could issue your Scoping Opinion by 28 February 2023.

If you have any questions on the above, please do not hesitate to contact me.

Yours sincerely,

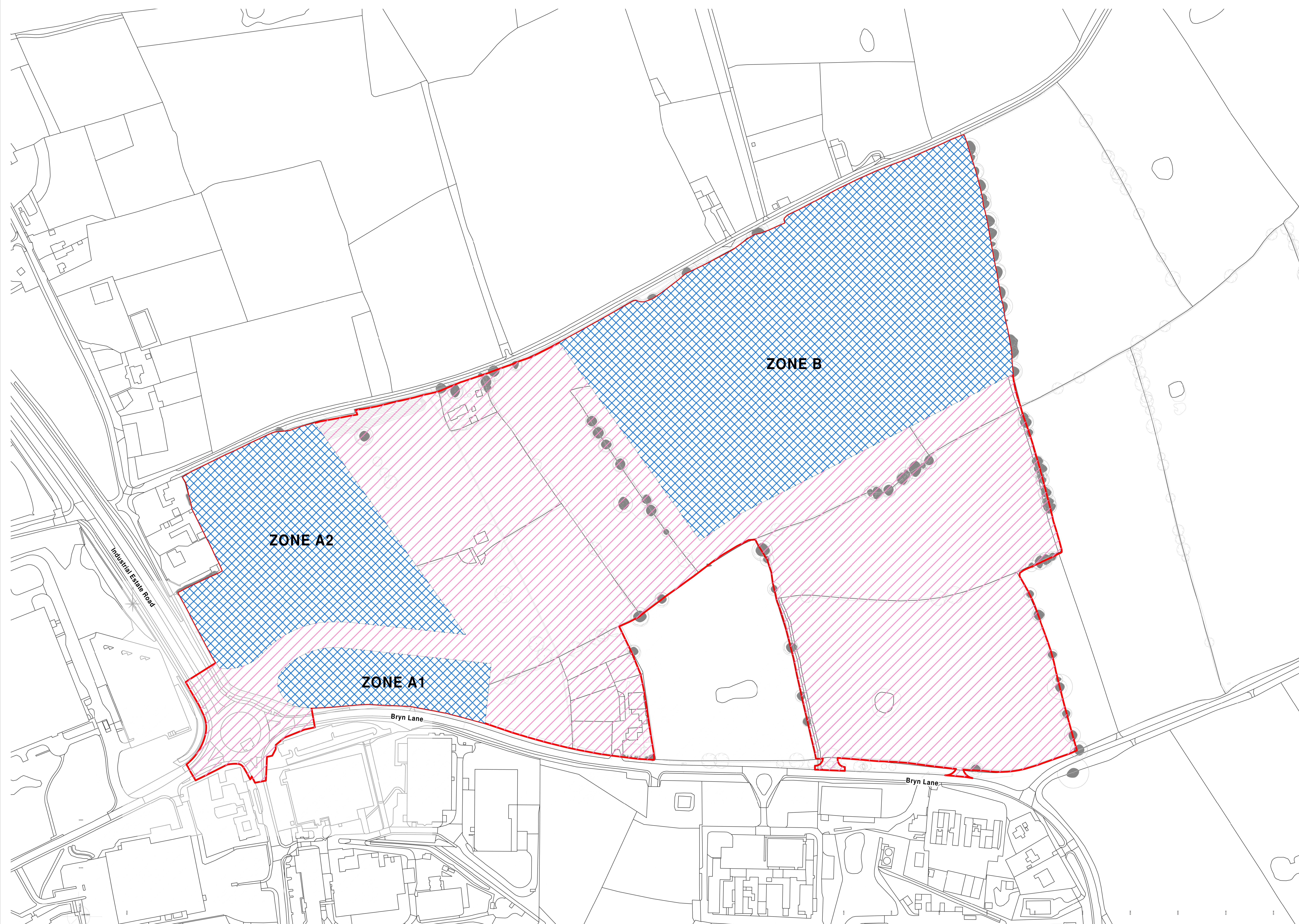


Rebecca Raby-Smith
Senior Consultant
CBRE Ltd

- Enc. Site Location Plan in Appendix A & Proposed LVIA Viewpoints in Appendix B
- cc. John Hughes (Net World Sports)
Helen Clarkson (CBRE)
Sarah Grady (CBRE)
Patrick Little (CBRE)

Appendix A

Site Location Plan



- LEGEND**
- Application Boundary
37.21Ha || 91.94Ac
 - Area of Full Planning Application
21.00Ha || 51.85Ac
 - Area of Outline Planning Application
16.21Ha || 40.05Ac



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Wrexham
Bryn Lane

Drawing Name:
Full/Outline Plan without detailed building
masterplan

Drawing Stage: **PLANNING**

Status: **S2**

SGP File Ref: 23136-SGP-ZZ-ZZ-M3-A-000001

23-136 21/02/2023 A2 MMS 1:1250 @ A0

SGP Project No. Date Drawn Team Scale Rev

Drawing Number: 22136-SGP-ZZ-ZZ-DR-A-111005

Project Code: 23136-SGP-ZZ-ZZ-M3-A-000001

Full/Outline Plan without the detailed buildings
1 : 1250

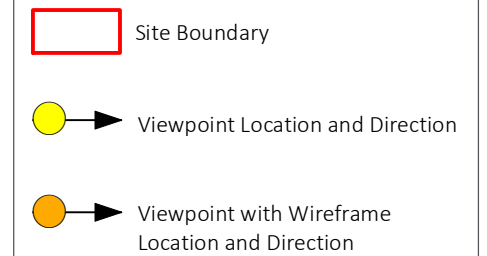


Appendix B

Landscape and Visual: Proposed Viewpoints



LEGEND:



Public Rights of Way:



NICHOLSONS
Leading solutions for the natural environment

TITLE:	Viewpoint Location Plan
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PROJECT/SITE:	Wrexham
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CLIENT: Mauna Kea Limited

MAP REF:	5967/01/22-1959
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VERSION:	v2
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DATE: 20/02/23 SCALE: 1:20,072 @A3

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HS	SM

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