

FAO Gwyn Humphreys
Wrexham County Borough Council
Planning & Regulatory Service
Guildhall
Wrexham
LL11 1AY

Sent via email only

14 November 2023

Dear Gwyn,

LAND NORTH OF BRYN LANE, WREXHAM INDUSTRIAL ESTATE – P/2023/0497

APPLICANT RESPONSE TO CONSULTEE COMMENTS

Please find enclosed a response from CBRE Limited, on behalf of Net World Sports (hereafter referred to as ‘the Applicant’), in relation to several consultation responses provided to date on application reference P/2023/0497.

The below details each consultee and their comments in turn, along with a response from the Applicant where necessary. This letter should be read in conjunction with the earlier response issued by CBRE (dated 25th October 2023).

Bunds

The case officer has raised concerns regarding the bunds which are proposed as part of the scheme. The case officer confirmed that they have concerns that the proposed bunds “would prejudice the purpose and effectiveness of the ecology mitigation areas. Indeed, it seems unlikely that both a bund and an effective ecology mitigation area could be provided on the same land”.

There is no further evidence or justification provided for this statement and therefore it is not clear why a bund is considered to prejudice the effectiveness of the ecology mitigation area. Nevertheless, we have responded to this comment below, incorporating the advice of the Applicant’s ecologist The Environment Partnership (TEP), who have extensive experience in proposing appropriate mitigation strategies.

TEP have confirmed that the proposed bunds do not prevent an effective ecology mitigation area from being established. Indeed, the inclusion of bunds can have the following benefits:

- A key point is that south facing slopes, as proposed within this application, actually provide basking areas for reptiles and there can be sections of bare earth and scree included to encourage this. For this to be successful, bunds must be designed at an appropriate gradient.
- It is possible for hibernacula for amphibians and reptiles to be incorporated into bunds through use of the appropriate materials, such as crushed stone, which then provides over wintering for these species.
- Tussock forming grasses can also be added to bunds to provide additional habitats for invertebrates which will be a further benefit.
- Bunds have the potential for good drainage and therefore botanically, with the correct planting mix, floristic value will be provided and this in turn provides feeding, egg laying and basking opportunities for butterfly species.
- The northern sides of the bunds can be planted with native shrubs, holly, haze and hawthorn which will provide cover and food for species.

The majority of the proposed bunds are located within the outline part of the application site. The proposed planting and gradient of the bunds within this area will therefore be confirmed at Reserved Matters stage, when the above features can be incorporated.

Additional benefits associated with the proposed bunds include:

- The creation of bunds will involve retaining a significant amount of soil material on site, which will reduce construction vehicle traffic movements as there is no requirement for significant numbers of vehicles to travel to and from site to move the soil off site. This has associated benefits in terms of transport, air quality and noise impacts.
- The proposed bunds have been assessed within the submitted Environmental Statement in terms of their role as mitigation for both noise impacts upon nearby residential receptors and also as landscape mitigation to reduce the visual impact of the scheme for receptors located to the north and west of the site. This should also be considered when assessing the suitability and necessity of the bunds to the northern and north-western site boundaries.

Overall, it is considered that there are no negative barriers to wildlife and ecology mitigation if the bunds are designed and managed correctly. The maintenance requirements are not onerous and require the area to be strimmed as opposed to mowed. The maintenance programme can be secured via a suitably worded planning condition, to ensure that the mitigation areas are appropriately managed in the future.

Tree Officer

The Tree Officer has objected to the proposed development due to the following:

1. Hard surfacing will increase ground/air temperatures, pollution, energy use, and reduce air/water quality. Cell planting pits should be included.
2. Highway verge on the primary route should be increased to at least 0.4m width to accommodate required tree/hedgerow planting.
3. Vehicle parking areas should have wider verges to improve depth and diversity of planting.
4. Position of footpaths from the adjacent highway should be separated by a planting strip/buffer zone to improve pedestrian health and safety.
5. Wellness trail should have increased planting of native trees and understorey species.
6. Mitigation and enhancement of native hedgerow required.
7. Shrub planting within or adjacent to retained trees and their RPAs should be native.
8. Santamour Guidelines should be used to deliver more diverse tree planting inc. medium/large broadleaf and evergreen trees.
9. The main roundabout requires an improved landscaping scheme.
10. Overall layout does not ensure suitable landscaping for improving biodiversity, air quality, or local temperatures.

Please see Appendix A which includes a response from the Applicant's landscape architect, Nicholsons. The response relates to the points as numbered above.

Green Infrastructure Statement

A Green Infrastructure Statement has been requested by WCBC to meet the requirements of the recently amended Planning Policy Wales (Ed 11, 2021) and is currently being prepared. This document will be submitted once available.

Sequential Test

Further to our letter dated 25th October 2023, a sequential test has been conducted in relation to the proposed Use Class C1 use at the site and is appended to this letter (Appendix B).

Clwyd-Powys Archaeological Trust (CPAT)

Further to our letter dated 25th October 2023, a response to CPAT has been provided and is included in Appendix C.

Public Rights of Way

The WCBC Senior Definitive Map Officer has responded on the application regarding the Public Rights of Way (PRoW). The Officer has provided the following comments:

- The Application provides a new footpath along the eastern boundary, however the legal line of Holt public footpath 26 and part of Isycoed public footpath 6 will need to remain open to the public and any outdoor equipment should not encroach on the footpath.
- WCBC preference would be to add the section linking Holt footpath 26 with Holt footpath 25 and also within the site the section from Isycoed footpath 6 running adjacent to unit 2 to terminate on Ridley Wood Road (as shown on the proposed illustrative site masterplan, drawing number 22136-SGP-ZZ-ZZ-DR-A-111001) to the definitive map for Wrexham by entering into a creation agreement with the landowner under section 25 of the Highways Act 1980.
- WCBC request that existing stiles leading into the site and within the site are removed and a gap is left, or where there is a need for the structure this should be a pedestrian gate that meets British Standards requirements.

The Applicant has reviewed the requests from the Senior Definitive Map Officer and can confirm that they will undertake the upgrades to remove the existing stiles along Public Rights of Way (PRoW) within the red line boundary and replace with gates. The Applicant has noted an existing issue associated with mud and puddles adjacent to the stile where ISY/6 footpath enters the site at the existing stile and so is proposing to put stone down in this area to assist with the current issues which should make the paths more useable to the public.

We note that the PRoW does enter the site on the ISY/6 path and follows HOL/26 to Francis's Lane to the north. In accordance with Schedule 12A of the Highways Act 1980, the statutory width for a PRoW in a field is 1.5m for a field edge path. The Applicant therefore proposes to maintain a 1.5m grass strip that is occasionally mown against the eastern boundary hedgerow, which will allow users to continue to use the existing PRoW within the site.

In response to the request for proposed paths within the site to be adopted as PRoW, the Applicant considers that this is not a suitable option given the wider security considerations of the operational site, which means that some parts of the site may not be accessible 24/7. However, the Applicant has confirmed that access will be provided which would enable the public to access between the two PRoWs along the northern boundary (either side of Francis's Lane) which would still be an overall benefit to the PRoW network.

Area Schedule

In the application submission, there is reference to construction of new buildings within the outline part of the hybrid application site collectively providing up to 72,635 sqm GEA of floorspace for B1c (light industry appropriate in a residential area), B2 (general industrial), and B8 (storage and distribution) uses, as well as potential ancillary retail/drive thru facilities, a hotel and a petrol filling station (Use Classes A1, A3, C1 and sui generis). However, this floorspace figure is an error, and this should be reduced to **61,660sqm GEA** for the outline component.

This does not affect any of the plans submitted as part of the hybrid planning application. The floorspaces reported for the detailed part of the hybrid application are also unaffected.

In respect of the Environmental Statement (ES), the higher area schedule used for the ES, which included the 72,635 sqm GEA for the outline area, continues to represent a worst-case scenario for all technical assessments. This is with the exception of the socio-economics assessment, where a higher area schedule would overinflate the beneficial effects associated with the generation of operational employment. However, as reported in ES Chapter 7: Socio-Economics, a minimum worst-case has already been used to inform the basis of the assessment (47,000 sqm), which is still considered to be a reasonable worst-case. Based on this, the assessment undertaken in the EIA continues to remain robust and the conclusions of the ES remain valid.

As such, no replacement plans or technical documents are considered to be required as a result of this correction.

Summary

If you have any further queries or comments in relation to the above, please do not hesitate to contact me using the details provided.

Yours sincerely

Helen Clarkson
Associate Director – Planning & Development

APPENDIX A – TREES RESPONSE

RESPONSE TO TREE OFFICER COMMENTS ON TREES AND LANDSCAPING

Project	Land North of Bryn Lane, Wrexham Industrial Estate, LL13 9US		
Case No	P/2023/0497		
Date received	04 October 2023	From	Wrexham County Borough Council Jon Brewin – Tree Officer
Date response	30 October 2023	By	Jonathan King CMLI Senior Landscape Architect - Nicholsons

This note has been prepared in response to comments from Wrexham County Borough Council's (WCBC) Tree Officer in relation to planning application reference P/2023/0497. The following addresses each point in turn and should be read alongside the comments from WCBC (04/10/2023).

1. Hardsurfacing across the site - It is agreed that additional trees in car park hard surface areas would have an environmental benefit. For the outline areas of the hybrid application landscaping is a reserved matter and therefore the soft landscaping of these areas is not applied for in detail, and will be confirmed at a later (Reserved Matters) stage. The request for cell structured planting pits within hardstanding areas has been proposed by the Tree Officer; however, these would not be effective in single bay spaces due to kerb haunching and construction foundations. Inclusion of trees in lorry parking areas and service yards is not feasible due to the turning radii and mechanics of HGV driving. It should be borne in mind that even with soil supporting grids helping the rootballs, there is always the possibility of clash between vehicles and trees when they are notched in between parking spaces, even with tree protection guards installed.
2. Highway verges – the layout plans show a 4m wide pathway adjacent from the road kerblines with 5m+ landscape verges thereafter in which the trees and planting are situated. We feel that this kerb offset layout is suitable for an industrial area site. If trees are planted within a planted margin adjacent to the road, there will be conflict between the developing canopy of the tree and high sided HGV vehicles, and this would not aid long term development of the trees. Having the trees and planting beyond the 4m offset will allow sufficient root spread into surrounding soil and aid long term establishment. There is also the clash with services and drainage if trees are planted within a margin next to the road as roots generally gravitate towards a source of water or moisture within the ground and could result in future pipe maintenance issues. The provision and maintenance of utilities along this verge is always a concern as any trees planted within this area could also be subject to future poor construction practices that affect root zones. Our main 'Avenue' of trees is along the stretch adjacent to units 1 and 2, as shown on the illustrative masterplan. The planting space is linear, bordering unit 1 and the response was to include an avenue of Pin Oak trees, underplanted with locally important bulbs and larval food plants beneath within a wildflower grass mix. This tree avenue is repeated both sides of the road to achieve a balanced approach. Where we have more space on the south side by unit 2, we have also included a more informal arrangement of trees of varying species that respond to the existing trees in that area around the pedestrian path and seating areas.

3. Vehicle parking areas – the planting approach in the parking areas is more ornamental and formal as these areas will have high user volume and species selected are suitable for such linear parking spaces. Evergreen and flowering shrubs, groundcover and ornamental grasses are used in these areas combined with trees where possible. This approach does contrast with a much more natural and native approach in the wider site where potentially 1,121 no. trees are to be planted (half of which are in outline areas where planting is indicative only at this stage). This is coupled with the native hedgerow planting which would deliver a potential 4.83km of hedgerows as well as native scrub, aquatic marginal, bulbs, larval food plants and wildflower grass mixes in the appropriate areas. Consideration should be given to the different planting approaches in different areas and the overall combined effect within the site.
4. Pedestrian footpath buffers – this is a similar issue to the highway verges (item 2) as a strip of trees and planting in this position would have potential problems for flourishing long term given the vehicular use of the road. We feel that having clear view lines adjacent to the roads would actually aid safety for both pedestrians and vehicular users. We would also question how a strip of planting could realistically benefit air quality and noise reduction within a limited area where much larger areas of space are needed to make those beneficial impacts.
5. Wellness Trail – there are certain areas of the trail along the eastern boundary that do not have as many large native trees as originally envisaged due to the gas easement requirements set out by Wales and West Utilities. Trees in general and especially large stature trees cannot be planted within certain corridors from the centre line of the pipe and we have adhered to those guidelines. In other areas, we feel that we have achieved a good balance of trees, with wildflower grass, native shrub (scrub), aquatic and marginal planting that can be maintained within a sensible management program going forward. Gathering spaces along the trail have been identified and associated tree planting and scrub planting provides a more protected intimate feeling.
6. Hedgerows – we have incorporated over 4.8km of new native hedgerows within the scheme (2.57km in the detailed component and potential for 2.26km in the outline component, as shown on the illustrative landscape masterplan). Many of these hedgerows surround and link the plots such as Units 1 and 2 and in between units 6, 7, the potential hotel and units 8, 9, 10 (as shown on the submitted Illustrative Masterplan). These act as habitat and foraging corridors linking to the existing boundary hedgerows and beyond. We feel that the provision for native hedging is sufficient within the site.
7. Existing trees and ponds interface – this is a valid point about increasing the water table within the vicinity of existing mature trees but we have considered that the 3no existing ponds in this area will have already an impact on the current water table. We could reconsider the position of 3no of the closest proposed ponds or incorporate some form of lining for the new ponds which could alleviate the issue, which could be secured via a suitably worded planning condition at detailed design stage. The combination of stepping-stone ponds, aquatic planting, native scrub planting with the existing large trees within the central ecological corridor is a key landscape and ecological feature as the intention was to complement the 3no existing ponds within that area. All shrub (scrub) planting mixes within the site are native. We only propose ornamental shrub and groundcover species in key areas and appropriate spaces such as entrance nodes and car park zones.

8. Tree species diversity – we have included a range of 20 native tree species within the regular standard mix, with only 3 of the same genera (*Prunus* spp), 2 *Quercus* spp, *Salix* spp and *Sorbus* species. We haven't strictly followed the 10-20-30 rule as such but the species selection was based on an understanding of the locality through guidance documents produced by the North Wales Wildlife Trust. Large mature broadleaved and evergreen trees are located carefully throughout the site, especially Pedunculate Oak which are given plenty of space in which to mature in a pattern similar to the existing oaks on site and those throughout the boundary hedgerows and planted areas within Wrexham Industrial Estate. Native Scots Pine are also included in a similar manner. Longevity, biodiversity, provenance and habitat were considered during the selection process. We have used some cultivar species in car park areas but the majority of these are based on native trees. 7 no species of hedgerow trees proposed are also native. We wanted to achieve a structured strategy of species rather than a wider random approach and the ability to be sourced locally was considered.
9. The roundabout is within Wrexham Council Highways ownership and as adopted highways land the Applicant has not sought to redesign this area as this is not within the Applicant's control and could present an additional landscape maintenance cost to the Council.
10. Overall – the proposed landscape within the site layout does provide many elements that contribute to biodiversity and sustainability with circulation routes close to existing retained native hedgerows and trees, increase in water bodies to enhance habitats and significant native hedgerows throughout. Inclusion of rest and seating areas, exercise areas, pondside decking, feature structures and SUDS swales all contribute within a setting of native trees and wildflower grasslands that can support a meaningful range of wildlife habitats and useable spaces.

The tree planting strategy responds to the arrangement of buildings and the subsequent space for planting in those areas. A more loose, natural arrangement is shown where we have a similar building arrangement in that western area, which contrasts with a more linear approach in the avenue area to the east. The trees in linear spaces still perform a valuable function of screening and biodiversity especially when considering the ground layers of vegetation. We feel that having a random mix of trees throughout the whole site would not be an appropriate response in terms of design and we have to combine the functional and aesthetic to achieve a considered and balanced outcome.

This note has highlighted that the proposed development will result in a substantial amount of additional net planting of trees and hedgerows, to the benefit of the site and its surroundings.

Jonathan King BA(Hons), DipLA, MI Hort, CMLI
Senior Landscape Architect

APPENDIX B – SEQUENTIAL TEST

Sequential Test

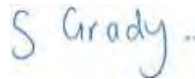
Land North of Bryn Lane, Wrexham Industrial Estate

CBRE Limited
On Behalf of Net World Sports

November 2023

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Reference:	Land North of Bryn Lane, Wrexham		
Job Number:	Date:	Prepared By:	Verified By:
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1.0 Introduction

- 1.1 This Sequential Test report has been prepared by CBRE Limited on behalf of Net World Sports ('the Applicant') in support of a hybrid planning application for a proposed development known as 'Utopia City' on Land North of Bryn Lane, Wrexham Industrial Estate (ref. P/2023/0497).
- 1.2 The proposals include a range of uses, including Use Classes B1(c), B2, B8, A1, A3, C1 and Sui Generis floorspace including ancillary office space (Use Class B1a), access, servicing, parking and landscaping.
- 1.3 The description of the proposed development is as follows:

Hybrid application seeking: Full planning permission for demolition of existing buildings and the severable and phased erection of Class B1c/B2/B8 development with ancillary Class B1a floorspace and associated infrastructure (including substation and access); and Outline planning permission for the severable and phased construction of Class B1c/B2/B8 development with ancillary Class B1a floorspace; retail, drive-thru, hotel, petrol station (Classes A1/A3/C1/sui generis); and associated infrastructure (all matters reserved).
- 1.4 The application site comprises agricultural land to the north of Bryn Lane, Wrexham Industrial Estate (the 'Site'), as shown on the location plan below.



Figure 1: Site Location, Source: SGP Architects

- 1.5 The Site is not allocated for a specific use in the statutory development plan (Wrexham Unitary Development Plan, 2005) and is located outside of the Wrexham Industrial Estate Settlement Limit on Wrexham County Borough Council's (WCBC), adopted proposals map. The site is out of centre in retail sequential terms.
- 1.6 However, the Site is identified as a Key Strategic Site in the draft Local Development Plan (LDP) under draft Policy SP11 'KSS3: Land to the north of Bryn Lane, Wrexham Industrial Estate' for 28ha of Use Class B employment uses.
- 1.7 The LDP has been found sound by an Inspector following examination; however, at an Extraordinary meeting on 19th April 2023, and at a further meeting on the 14th June 2023, the Council voted against the adoption of the LDP. As the LDP has been through examination and been endorsed by a Planning Inspector, this still forms a significant material consideration in the determination of this planning application.
- 1.8 It should be noted that during the two meetings and subsequent votes regarding whether or not to adopt the LDP, the application site or the proposed allocation of the site in the LDP were not a point of discussion or reason for voting against the adoption of the LDP.
- 1.9 The Planning Statement addresses the need for the development and the socio-economic benefits of the scheme in detail.
- 1.10 Following submission of the application, the Case Officer has requested a sequential test in line with the requirements of paragraph 4.3.18 of Planning Policy Wales (PPW) (Ed. 11, 2021).
- 1.11 This report is structured as follows:
 - **Section 2: Planning Policy** – provides an overview of the planning policy requirements for the sequential test;
 - **Section 3: Scope of the Sequential Test** – details the non-employment uses proposed and establishes which uses are to be considered in the sequential test;
 - **Section 4: Sequential Test** – details the findings of the sequential test; and
 - **Section 5: Summary & Conclusions** - details the main conclusions of this report.

2.0 Planning Policy

- 2.1 This chapter summarises relevant planning policy relating to the sequential test requirement. The statutory development plan for WCBC currently comprises the Wrexham Unitary Development Plan (UDP) (adopted 2005), which covers the plan period 1996 to 2011. It is important to note that this plan period ended 12 years ago and therefore there are saved policies which are out of date and inconsistent with national policy.
- 2.2 As detailed in Section 1.0 of this report, the emerging Wrexham Local Development Plan is to be given significant weight in the decision-making process.
- 2.3 Other material considerations include Planning Policy Wales (PPW) and Technical Advice Note 4 (2016).

Planning Policy Wales (2021)

- 2.4 Planning Policy Wales (PPW), published in February 2021, 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.
- 2.5 The Welsh Government states that 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 (paragraph 1.2). There is a presumption in favour of sustainable development in accordance with the development plan, unless material considerations indicate otherwise (paragraph 1.18).

Active and Social Places

- 2.6 Planning authorities need to ensure that residents of existing and new communities have access to jobs and an appropriate range of community facilities including recreation, leisure, health and education (paragraph 4.0.2).
- 2.7 New development should be located and designed in a way which minimises the need to travel, reduces dependency on the private car and enables sustainable access to employment, local services, and community facilities.
- 2.8 In determining planning applications, planning authorities must ensure development proposals, through their design and supporting infrastructure, prioritise provision for access and movement by walking and cycling and, in doing so, maximise their contribution to the objectives of the Active Travel Act (2013) (paragraph 4.1.34).
- 2.9 Section 4.3 *Retail and Commercial Development* sets out that retail and commercial centres are hubs of social and economic activity, and the focal point for a diverse range of services. They are highly accessible to different modes of transport and are the most sustainable locations for new development.
- 2.10 In regards to the sequential test, PPW sets out that the Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial centre development, and in implementing this policy, local authorities should adopt a sequential approach to the selection of new sites in their development plan and when determining planning applications for retail and other complementary uses (paragraph 4.3.18).

- 2.11 If a suitable site or building to meet identified need is not available within a retail and commercial centre or centres, then consideration should be given to edge of centre sites and if no such sites are suitable or available, only then should out of centre sites in locations that are accessible by a choice of travel modes, including active travel and public transport, be considered. Developers should demonstrate that all potential retail and commercial centre options, and then edge-of-centre options, have been thoroughly assessed using the sequential approach before out of centre sites are considered (paragraph 4.3.19).
- 2.12 Paragraph 4.3.20 sets out that the sequential approach applies to retail and ‘all other uses complementary to retail and commercial centres’, including:
- Financial and professional services (Use Class A2);
 - Food and drink (Use Class A3);
 - Offices (Use Class B1);
 - Hotels (Use Class C1);
 - Educational and other non-residential establishments (Use Class D1);
 - Leisure (Use Class D2); and
 - Certain other uses such as laundrettes and theatres.
- 2.13 Planning authorities should be flexible in their approach where it is necessary. The nature of a proposed use is likely to determine what type of centre (i.e. higher or lower order centre) is most appropriate as a starting point for the sequential approach process.

Productive and Enterprising Places

- 2.14 Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration (paragraph 5.4.4). Development should be co-ordinated with all forms of infrastructure provision such as transport and utilities (paragraph 5.4.13).
- 2.15 Economic clustering typically occurs when businesses from the same or similar industry, or with a common interest, choose to locate in close proximity for mutual benefit. Businesses can benefit from shared facilities, infrastructure, local pools of skilled and qualified labour, common supply chains, and links to higher education (paragraph 5.4.16). Planning authorities should seek to support the development of business networks and clusters (paragraph 5.4.17).

Technical Advice Note 4 Retail and Commercial Development (2016)

- 2.16 Technical Advice Note (TAN) 4 *Retail and Commercial Development* provides guidance on the role of land use planning in retail and commercial development.
- 2.17 Section 7 sets out the requirements of the sequential test, which supports the Welsh Government’s policy objective of promoting centres identified in the retail and commercial centre hierarchy as the most sustainable locations to live, shop, socialise and conduct business.
- 2.18 Planning applications for retail, leisure and other complementary uses should be subject to the sequential test. The sequential location of development plan allocations or planning applications should be considered in the following order:

- Firstly, within retail and commercial centres identified in the retail hierarchy where suitable sites, or buildings for conversion are available. Where this relates to a development plan allocation, they must be available for development within the plan period. Local planning authorities should ensure that any development plan allocation or planning application is of an appropriate scale in relation to the role and function of the centre.
- If no suitable sites are available in retail and commercial centres then edge-of-centre locations should be considered, with preference given to brownfield sites that are or will be well connected to the existing centre and accessible by a variety of means of transport, particularly walking, cycling and public transport.
- Only when retail and commercial centres and edge of centre locations have been considered and found to be unsuitable can out of centre options within, and then outside, a settlement area be considered. Where out of centre sites are concerned preference should be given to brownfield sites which are or will be well served by a choice of means of transport and are close to an established retail and commercial centre.

2.19 In terms of suitability, TAN 4 sets out that suitability refers to a site's attributes and whether these are sufficient to meet the development requirements of a proposal. Paragraph 7.2 states:

"Where a developer favours a development site on the edge of or outside a retail and commercial centre the developers will need to provide evidence to explain why potential sites or buildings within the centre are unable to accommodate the format, scale and design of a proposed development."

Unitary Development Plan (2005)

- 2.20 The Unitary Development Plan (UDP) (2005) covers the plan period 1996-2011 and provides a framework for local decision making. The plan is divided into two parts: Part 1 outlines the Council's broad intention for development and provides a framework for more specific policies and proposals; Part 2 constitutes the Council's specific policies and provides detailed guidance for development.
- 2.21 Policy S2 states that outside of the principal shopping streets of Wrexham Town Centre, encouragement will be given to ground floor retailing proposals. Mixed use commercial development will be allowed only if it enhances the vitality and environmental quality of the area.
- 2.22 Policy S3 sets out that only where there is a clearly defined need which cannot be accommodated on a site or sites in preferred locations, should out of centre sites accessible by a choice of means of transport, be considered. A developer must demonstrate that all potential sites in preferred locations have been thoroughly assessed, before proposing less central sites for other key town centre uses.

Emerging Wrexham Local Development Plan 2013-2028

- 2.23 The application site is identified in the emerging LDP as a Key Strategic Site under draft Policy SP11 'KSS3: Land to the north of Bryn Lane, Wrexham Industrial Estate' for 28ha of Use Class B employment uses.
- 2.24 Draft Policy EM2 *Provision of Supporting Facilities for Employees in Business, Industrial and Warehousing Developments* sets out that provision for open space, public realm, leisure, food and drink, and child-care facilities will be appropriate in the employment areas shown on the proposals map, provided:
- i. the facility is of an appropriate size and scale and is subordinate in its nature to meet the needs of workers in the vicinity and does not result in an over concentration of such facilities in one area,
 - ii. the proposal does not impact on the status and character of the employment area for B1, B2 or B8 uses,

- iii. the operations of other industrial and employment uses in the vicinity of the site would not be adversely affected, and
 - iv. the proposal would not result in significant levels of visitor traffic into the area or exacerbate existing traffic conditions.
- 2.25 In the justifying text the Council highlight that the absence of such facilities in an employment area can increase travel demand and make the areas less attractive to employers and employees. Where new employment areas are proposed, the need for such facilities should be considered as part of the overall development scheme. In all cases, only facilities of an appropriate nature and scale to meet the needs of employees will be permitted.
- 2.26 Policy R1 *Retail, Leisure and Commercial Centre Hierarchy* of the emerging LDP sets out the centre hierarchy for proposals:
- Wrexham Town Centre,
 - The District Centres of Cefn Mawr and Gwersyllt,
 - The Local Centres of Borrass, Chirk, Coedpoeth, Gresford, Llay, Penybryn and Rhosllanerchrugog,
 - The Village Centres of Brynteg, Holt, Ruabon and Rossett, and
 - The Neighbourhood Centres of Churchill Drive, Garden Village and Park Avenue, Wrexham.
- 2.27 Draft Policy R6 *Retail, Leisure and Commercial Development (Edge and Out of Centre)* states that proposals in such locations will need to demonstrate compliance with the National Planning Policy sequential test; the preference is first to locate new development within a retail, leisure and commercial centre. Where proposals demonstrate there are no suitable available sites or premises within these centres, then edge of centre sites can be considered and if no such sites are suitable or available only then should out of centre sites be considered.

3.0 Scope of the Sequential Test

Non-employment uses

- 3.1 The proposals include a range of uses, including Use Classes B1(c), B2, B8, A1, A3, C1 and Sui Generis (petrol filling station) floorspace including ancillary office space (Use Class B1a), access, servicing, parking and landscaping.
- 3.2 The application is hybrid in nature, with employment uses and associated infrastructure applied for in the detailed element and a mix of employment, retail, food and drink, hotel and petrol filling station uses applied for in the outline element of the application site. The overall quantum of Use Class A1, A3, C1 and/or Sui Generis use floorspace would not exceed 16,150 sq m Gross External Area (GEA).
- 3.3 As set out in Section 2.0 of this report, PPW requires a town centre first approach for retail and ‘all other uses complementary to retail and commercial centres’ (paragraph 4.3.18).
- 3.4 The application site does not benefit from a land use allocation which includes use classes A1, A3 or C1 in the adopted or emerging development plan, and is outside of a defined centre.
- 3.5 However, in the emerging LDP draft Policy EM2 *Provision of Supporting Facilities for Employees in Business, Industrial and Warehousing Developments* sets out that provision for open space, public realm, leisure, food and drink, and child-care facilities will be appropriate in the employment areas shown on the proposals map subject to the facility being an appropriate size and scale and subordinate in nature to the employment use of the area.
- 3.6 Therefore, the proposed Use Class A1 and A3 uses are considered to be appropriate for the proposed location, in accordance with Policy EM2. Specifically, the proposals satisfy the four tests as set out in this policy regarding the appropriate sizing of such facilities; the need to ensure the character of the area for employment use is not undermined; the operations of other employment uses in the area are not adversely affected; and that there would not be a significant level of visitor traffic to the area as a result of the proposed ancillary uses.
- 3.7 Policy SP9 of the LDP *Economic Growth Employment and Enterprise* sets out that WCBC will ensure an overall provision of employment land within the Borough of 96.73ha. The KSS3 allocation is for 28ha; however whilst there is an amount of non-B1, B2 and B8 use proposed (16,150 sq m GEA), this is ancillary to the proposed employment floorspace (108,764 sq m GEA) and therefore still aligns with criteria ii of policy EM2, in terms of ensuring the ancillary uses do not impact the status and character of the employment area.
- 3.8 It is also pertinent to consider that Matters Arising Change (MAC) 20 removed 16.82ha of employment land from the LDP as, at the time of the Matters Arising consultation, the land at Kingmoor Park still had permission for a power station that could have been implemented. However, the consent has now expired and there is a pending application (Ref: P/2023/0280) for employment development of use class B8. The site area is 25.4ha which includes land for ecological mitigation. The approval of this application would increase the overall employment floorspace at the Industrial Estate by 93,019sqm which is the floorspace area proposed across the three units. The proposed uses which are not B1, B2 and B8 use on the proposed site at Land to the North of Bryn Lane totals 16,150 sqm; therefore the A1, A3, C2 and sui generis uses proposed would not harm the character of the employment area or the overall employment land supply because there would be no net loss of employment land given the additional floorspace proposed at Kingmoor Park.

- 3.9 Whilst this demonstrates that there is no overall loss in employment land (subject to both applications being approved), even if the Kingmoor Park proposal is not approved, the Applicant considers that the proposed development at Land to the North of Bryn Lane remains acceptable in accordance with Policy SP9 and Policy EM2 of the LDP. Both applications should be determined on their own merits.
- 3.10 Therefore, regardless of the above, a sequential test has been carried out, as documented in this report. Of note, there is no policy requirement to undertake a sequential test for a petrol filling station as this is a Sui Generis use rather than retail or 'other complementary uses', as defined by paragraph 4.3.21 of PPW, which would warrant a sequential test.
- 3.11 A sequential test for the Use Class A1 and A3 uses is not considered necessary as such uses are considered to be acceptable in employment areas, as set out in the LDP.
- 3.12 A sequential test for proposed Use Class A1, A3 and Sui Generis uses is therefore not considered to be necessary or justified. The purpose of this report is therefore to set out the sequential test which has been undertaken for the Use Class C1 use (proposed hotel), in accordance with Section 4 of Planning Policy Wales.
- 3.13 The proposed hotel is one of several potential non-employment uses that could be developed in the outline part of the hybrid development. As such the total floorspace for the hotel is not fixed. The Transport Assessment which accompanies application reference P/2023/0497 has assumed that the hotel could accommodate 100 bedrooms. For the purposes of this sequential test we have considered that this would equate to a site size of 0.65ha.

Justification for proposed hotel use

- 3.14 The location of the proposed hotel as part of the wider scheme is a key benefit as the development will help to strengthen the offer to those visiting Wrexham Industrial Estate, and in particular the users of the lorry park.
- 3.15 Specifically, the proposed ancillary uses at the application site, including the hotel, have been identified by the Applicant as those necessary to serve the existing and future extension to Wrexham Industrial Estate. The current estate employs thousands of people; however it lacks facilities to meet the needs of employees and visitors.
- 3.16 Wrexham Industrial Estate is the UK's second largest industrial estate, extending to over 550ha and is recognised as a regionally and nationally important employment area. The Industrial Estate is home to over 340 businesses and employs over 10,000 people¹.
- 3.17 Despite its size and status, the Industrial Estate lacks a hotel offer as well as other amenities that employees would traditionally seek on an industrial estate of this size. There are no hotels located within the existing Industrial Estate boundary. The nearest hotel is Holt Lodge, which is 2.7km to the north of Wrexham Industrial Estate. This is not considered to be a sustainable approach to servicing the needs of visitors to Wrexham Industrial Estate as it provides limited choice and does not support sustainable travel options between hotel and Industrial Estate for the duration of the visitors' stay.
- 3.18 Trafford Park is the largest industrial estate in the United Kingdom, with Wrexham Industrial Estate the second largest. Trafford Park Industrial Estate includes a number of hotels and amenities, such as retail outlets and food and drink outlets which have not diluted the employment nature of the area, thus demonstrating that these uses can be features of a successful industrial estate and therefore should be considered appropriate in Wrexham. Slough Trading Estate is a further example which also includes a hotel

¹ <https://wrexham-industrial.com/>

alongside other ancillary uses, such as a gym and this is a successful industrial estate which shows that the ancillary uses can support the main purpose of the area.

- 3.19 A further key consideration is that the proposed development at land north of Bryn Lane includes a HGV parking area, in order to address known problems on the Industrial Estate relating to informal parking of HGVs in the local area, which causes amenity issues for local occupiers and residents. The inclusion of the HGV parking area will enable drivers and those in the logistics sector to park vehicles in a safe area and then access the hotel, if necessary. Alternative sites within Wrexham Town Centre, District Centres, Local Centres, Village Centres or Neighbourhood Centres would not be appropriate as this would increase the number of HGVs within these areas which would have potentially significant adverse impacts in terms of highways, noise, air quality and visual amenity. It therefore follows that the hotel and lorry park need to be located within close proximity to one another in order to address existing issues at the Industrial Estate, which would not be possible if the hotel is not within the Industrial Estate.
- 3.20 The location of a hotel within the Industrial Estate would assist in promoting sustainable forms of travel between accommodation and destination and could provide conference facilities or meeting rooms to support existing and future businesses. This supports PPW's policy aims regarding Active and Social Spaces and Productive and Enterprising Places, particularly in relation to promoting economic clustering.
- 3.21 This context is considered during the sequential test when assessing the suitability of in centre and edge of centre sites for a proposed hotel use of c. 0.65ha. The findings of the sequential test are explored in the next section.

4.0 Sequential Test

- 4.1 The application site is out of centre in sequential terms. CBRE has sought to establish whether there are any sequentially preferable sites within or on the edge of a designated centre, which are capable of accommodating the proposed development (without requirement to disaggregate etc.) which should be assessed. It is considered that in operating in the ‘real world’, the approach to site selection should not fundamentally compromise the development as proposed.
- 4.2 Policy R1 *Retail, Leisure and Commercial Centre Hierarchy* of the emerging LDP sets out the centre hierarchy for proposals:
- Wrexham Town Centre,
 - The District Centres of Cefn Mawr and Gwersyllt,
 - The Local Centres of Borras, Chirk, Coedpoeth, Gresford, Llay, Penybryn and Rhosllanerchrugog,
 - The Village Centres of Brynteg, Holt, Ruabon and Rossett, and
 - The Neighbourhood Centres of Churchill Drive, Garden Village and Park Avenue, Wrexham.
- 4.3 The approach taken to identify potentially sequentially preferable sites is set out below:
1. CBRE identified all available sites within or on the edge of Wrexham Town Centre which are being actively marketed and meet the size threshold;
 2. CBRE reviewed all hotels currently marketed for sale within the Wrexham borough to identify any potentially available sites; and
 3. The in centre and edge of centre allocated sites within the LDP were reviewed to identify if any sites would be suitable for the proposed hotel use.
- 4.4 For the purposes of the assessment, ‘edge of centre’ was taken to mean sites within 300m of the centre boundary. The assessment approach is set out below, in relation to suitability and availability, in line with the requirements of TAN 4.

Availability & Suitability

- 4.5 The availability of sites has been assessed using the following steps:
1. CBRE identified all available sites within or on the edge of Wrexham Town Centre which are being actively marketed;
 2. CBRE reviewed all hotels currently marketed for sale within Wrexham to identify any potentially available sites;
 3. Consideration as to whether the identified sites meet the site size threshold; and
 4. Consideration of the suitability of the sites in relation to the proposed development.
- 4.6 CBRE has used the following websites to identify all available sites which are being actively marketed. The site of the proposed hotel is c. 0.65ha and therefore sites over 0.5ha have been considered as complying with the site size threshold, demonstrating that a flexible approach has been taken by the Applicant:

- a. Rightmove
- b. Property Link Estates Gazette
- c. AddLand

4.7 All of the sites are either in or on the edge of centres in order to comply with the settlement hierarchy as set out in paragraph 2.26.

4.8 The table below sets out the sites which have been identified:

Table 4.1 – Schedule of sites being actively marketed in or on the edge of defined centres

No.	Address	Use Class (if applicable)	Size	Marketing Details / Comments	Link	Commentary	Outcome
1	Maes Eithan, Brynteg, Wrexham	C3	348 sqm	Jones Peckover, Denbigh	Plot for sale in Maes Eithan, Brynteg, Wrexham, LL11 (rightmove.co.uk)	Site size threshold not met	Site Discounted
2	Residential Development Site, Henblas Road, Rhostyllen, Wreccsam, LL14 4AD	C3	0.114 ha	Halls Commercial, Shrewsbury	Land for sale in Residential Development Site, Henblas Road, Rhostyllen, Wreccsam, LL14 4AD, LL14 (rightmove.co.uk)	Site size threshold not met	Site Discounted
3	St Giles Way Wrexham Town Centre, Wrexham, LL13 7DD	N/A - Suitable for mixed use development to include offices, restaurant, leisure, hotel, residential or community use subject to planning	1.19ha	Lambert Smith Hampton, Manchester	Office for sale in St Giles Way Wrexham Town Centre, Wrexham, LL13 7DD, LL13 (rightmove.co.uk) A Commercial Property For Sale In Wrexham, Wrexham, LL13 8NB Freehold 1.19 Hectares (estatesgazette.com)	The site is located within Wrexham Town Centre and therefore the location is not considered appropriate to meet the locational requirements of the hotel and associated lorry park. The site is also almost double the size of the current proposed site of the hotel.	Site Discounted
4	Wrexham - 19TH Century Town Public House	A3	360 sqm – approximate site area	Sidney Phillips Limited, North West	Pub for sale in Wrexham - 19TH Century Town Centre Public House, LL11 (rightmove.co.uk)	Site size threshold not met.	Site Discounted

5	Bangor University Investment, Wrexham Campus, Unit C, Archimedes Centre, Wrexham LL13 7YP	B1	633 sq. m	Bolton Birch, Chester	Office for sale in Bangor University Investment, Wrexham Campus, Unit C, Archimedes Centre, Wrexham LL13 7YP, LL13 (rightmove.co.uk)	Site size threshold not met	Site Discounted
6	Brynisa Road, Brynteg	C3	0.17ha	Town Country Estate Agents, Wrexham &	Plot for sale in Brynisa Road, Brynteg, LL11 (rightmove.co.uk)	Site size threshold not met	Site Discounted
7	High Street, Pentre Broughton	A1 / C3	45 sqm	Town Country Estate Agents, Wrexham &	Hairdressers or barber shop for sale in High Street, Pentre Broughton, LL11 (rightmove.co.uk)	Site size threshold not met.	Site Discounted
8	Henblas Road, Rhostyllen, Wreccsam, LL14 4AD	C3	0.114ha	Halls	A Commercial Property For Sale In Wrexham, Wrexham, LL14 4AD Freehold 0.28 Sq Ft (estatesgazette.com)	Site size threshold not met	Site Discounted
9	Site At Royal British Legion, Llay New Road, Watts Dyke, Wrexham, Wrexham, ORL	The property comprises a development site extending to 0.53 acres with detailed planning permission for a new build convenience store extending to 3,820 sq ft together with 16 car parking spaces and a new, independent access from Llay New Road	0.21ha	Legat Owen	A Land For Sale Or Rent In Wrexham, Wrexham, LL12 ORL Freehold 0.53 Acres (estatesgazette.com)	Site size threshold not met	Site Discounted

10	Plot at Summerfields, Rhostyllen, Wrexham, LL14 4EU	C3	0.08ha	Auction House Cheshire & North Wales	Plot at Summerfields Bare for sale in Wrexham Addland	Site size threshold not met	Site Discounted
11	Railbridge Court and Tyrewise	B2/B8	0.12 ha	Bowen Son and Watson - Wrexham	Railbridge Court and Tyrewise Industrial for sale in Wrexham Addland	Site size threshold not met	Site Discounted Site Discounted
12	Salem Chapel, Pishgah Hil, Pentre Broughton, Wrexham, LL11 6DB	D1	0.03ha	Connect UK Auctions - Crawley	Salem Chapel Conversion for sale in Wrexham Addland	Site size threshold not met	Site Discounted

4.9 The table below sets out all hotels which are currently being marketed within the Wrexham local authority area.

Table 4.2 – Schedule of hotels being actively marketed

No.	Address	Size	Marketing Details Comments	/ Link	Commentary	Outcome
1	Holt Lodge, Wrexham Road, Holt LL13 9SW	3ha	Fleurets Limited, North West	Hotel for sale in NW-122258 - Holt Lodge, Wrexham Road, Holt LL13 9SW, LL13 (rightmove.co.uk)	This site is available and meets the minimum site threshold but is not within a sequentially preferable location as it is also out-of-centre. Holt Lodge is also 2.7km away from the Industrial Estate and is therefore in a less suitable location to serve the Industrial Estate, compared with the application site.	Site Discounted

2	The Mulberry Inn, Llwynmawr, Llangollen, Wrexham, LL20 7BB	0.25ha	Christie & Co, Hotels	Hotel for sale in The Mulberry Inn, Llwynmawr, Llangollen, Wrexham, LL20 7BB, LL20 (rightmove.co.uk)	Site size threshold not met	Site Discounted
3	Hand Church Wrexham 5EY	0.38ha	Hotel, Street, LL14 Fleurets Limited, North West	Hotel for sale in M-227372 - Hand Hotel, Church Street, Wrexham LL14 5EY, LL14 (rightmove.co.uk)	Site size threshold not met	Site Discounted

- 4.10 Table 4.1 sets out all of the sites which are being actively marketed within or adjacent to Wrexham Town Centre. However whilst there are a number of sites, a number of these have been discounted as they do not meet the site size threshold. For the sites that do meet the site size threshold, they do not align with the locational requirements of the proposed hotel as the sites are not within or adjacent to Wrexham Industrial Estate and have therefore been discounted as they are not suitable. This is because the purpose of the proposal is to provide a hotel within the locality of Wrexham Industrial Estate, for the reasons set out in Section 3.0 of this report.
- 4.11 CBRE has reviewed all available hotels which are currently being marketed within Wrexham to identify if any hotel sites are available and being actively marketed which would meet the requirements of the hotel proposed as part of the scheme. These are set out in Table 4.2.
- 4.12 The Applicant notes that one of the hotels being marketed, Holt Lodge, is 2.7km to the north of the application site. This site is available and meets the minimum site size threshold but is not within a sequentially preferable location as it is also out-of-centre. Holt Lodge is also 2.7km away from the Industrial Estate and is therefore in a less suitable location to serve the Industrial Estate, compared with the application site.
- 4.13 There are no other hotels available for sale or available sites which have been identified by the Applicant within Wrexham Town Centre or on the edge of the town centre which would accommodate the proposal.

Accessibility

- 4.14 In line with the guidance set out in TAN 4, if a suitable site or building to meet identified need is not available within a retail and commercial centre or centres, then consideration should be given to edge of centre sites and if no such sites are suitable or available, only then should out of centre sites in locations that are accessible by a choice of travel modes, including active travel and public transport, be considered.
- 4.15 As demonstrated above, there are no available and suitable sites in a sequentially preferable location.
- 4.16 The Applicant has demonstrated in the submitted Transport Assessment that the application site is located in an accessible location enabling visitors and employees to make use of the existing public transport links and pedestrian / cycle facilities. The close proximity and links between the application site and Wrexham Industrial Estate therefore support the proposed use as it is accessible via sustainable means to the target market, which is users of and visitors to the Industrial Estate.

5.0 Conclusions

- 5.1 The sequential test undertaken by CBRE has identified that there are no suitable or available sites which are capable of accommodating the proposed hotel within the existing centres or edge of centre sites within Wrexham.
- 5.2 CBRE has undertaken a review of all available sites within or on the edge of Wrexham Town Centre, reviewed hotels currently marketed for sale and considered allocated sites within Wrexham Town Centre or on the edge of the centre in the LDP to identify if alternative sites could be considered.
- 5.3 The review has concluded that there are no available sites within or on the edge of Wrexham Town Centre which meet the site size threshold and which are considered suitable.
- 5.4 The proposed development is a logical extension to Wrexham Industrial Estate with accessibility via non-car modes including public transport and walking/cycle facilities from the site to the remainder of the Industrial Estate.
- 5.5 In the absence of any other sequentially preferable available or suitable sites being identified at the time of the planning application submission, it is concluded that the application site passes the sequential test set out in PPW, TAN 4 and Policy R6 of the LDP, as set out in section 2.

APPENDIX C – CPAT RESPONSE

Mr Gwyn Humphreys
Wrexham County Borough Council
Planning & Regulatory Service
Guildhall
Wrexham
LL11 1AY

Sent via email only

14 November 2023

Dear Gwyn,

P/2023/0497 – LAND NORTH OF BRYN LANE, WREXHAM INDUSTRIAL ESTATE

RESPONSE TO CLWYD-POWYS ARCHAEOLOGICAL TRUST

I write in relation to a consultation response (dated 24th August and 25th September 2023) provided by the Clwyd-Powys Archaeological Trust (CPAT) on the application submitted by Net World Sports on Land North of Bryn Lane, Wrexham Industrial Estate (application ref. P/2023/0497).

This letter provides a response to the CPAT consultation response, and is supported by a Technical Note prepared by the Applicant's heritage consultant, The Environment Partnership (TEP), provided in **Appendix 1**.

The main points raised by CPAT are:

- Insufficient/inadequate consultation between the Applicant and CPAT;
- Consideration should be given to removal of field 5 from the proposal to preserve the ridge and furrow field system earthworks;
- Further assessment is required of the sub-surface potential of the development area through a scheme of investigative trial trenching, which is requested pre-determination of the application; and
- Concern regarding the removal of the hedgerows which have been classified as 'important' under Schedule 1 Part II heritage criteria of the Hedgerow Regulations 1997.

This letter and the supporting Technical Note address the main points raised by CPAT above.

CONSULTATION

CPAT raised concerns regarding the level of consultation that has been undertaken. CPAT also noted that there is no heritage chapter within the Environmental Statement and limited information was provided at pre-application stage.

Applicant Response

CPAT has been consulted several times by both the Local Authority and the Applicant regarding the proposed development of the application site and therefore we consider CPAT's comments regarding insufficient consultation to be factually incorrect.

This consultation started with WCBC consulting CPAT on the Local Development Plan as it progressed, a document which included the proposal to allocate the application site as an employment site.

CPAT provided comments on some of the draft allocations in the emerging LDP. At paragraph 7.66 of the Inspector's Report, the Inspector notes that CPAT has no objection to the allocation of Site 16 (land north and south of Rossett Road) as the additional archaeological site investigations that CPAT requested had been carried out.

It is therefore clear that CPAT have been consulted on site allocations within the LDP, but provided no comment on the application site, 'KSS3', which implies that there were no concerns from a heritage or archaeological perspective.

The table below sets out the timeline for the consultation between the Applicant and CPAT as part of the pre-application process prior to the planning application being submitted. This demonstrates that the consultation has been thorough and there has been opportunity for CPAT to raise concerns regarding the loss of ridge & furrow or to request pre-determination trial trenching earlier than August 2023.

Further details of the consultation undertaken are included in **Appendix 1**.

STAGE	DATE	RESPONSE
Pre-application engagement with CPAT	2021 – 2022	Discussions with CPAT regarding methodology for the required heritage assessment. Please refer to Chapter 6 of the TEP Technical Note for further details. Email from CPAT dated 04/01/22 states: <i>“The ridge and furrow seems quite poorly preserved here on the lidar (although no coverage to the east) so we would probably not have any issues with that.”</i>
Pre-application request submitted to WCBC	CBRE submitted on 17/07/22 and WCBC responded on 09/11/22.	No response from CPAT is provided in the pre-application response from WCBC, and no mention of heritage / archaeology is made.
EIA Scoping	CBRE submitted in November 2022, with an addendum submit in February 2023. CPAT responded on 07/12/22. WCBC response was issued on 02/06/23.	In responding to the EIA Scoping Request, CPAT confirmed in their response that heritage could be scoped out of the Environmental Impact Assessment. Therefore, a standalone Heritage Impact Assessment (HIA) was prepared and submitted to support the planning application, in line with the advice from CPAT.
Pre-Application Consultation (PAC)	PAC carried out 19/06/23 – 17/07/23.	CPAT did not respond to the Pre-Application Consultation.
Planning Application	24/08/23 & 25/09/23	CPAT’s consultation response to the application is received. This includes the first mention of a requirement to preserve parts of the site in situ due to extant ridge & furrow and contains the first request to undertake trial trenching prior to determination of the application.

FIG. 1 SUMMARY CONSULTATION TIMELINE

PRESERVATION OF RIDGE & FURROW

In the consultation response from CPAT, one of the key points raised relates to the preservation of the ridge and furrow field system earthworks. CPAT consider that field 5, and to a lesser extent field 6, retain well preserved surface earthworks and related hedgerow field boundaries of medieval and post medieval date.

CPAT has suggested that consideration should be given to the removal of field 5 from the proposal in order to preserve these earthworks as they retain a characteristic curved profile plan. The area which the application site is within is defined as 'Outstanding and of High value' for its preservation of ridge and furrow field systems which are generally rare.

The following response should be read alongside **Appendix 1**.

Employment Land and Site Selection

A review has been undertaken of WCBC employment land requirements, as set out in the evidence base for the draft Local Development Plan (LDP).

Employment Land Review (2018)

The Employment Land Review (ELR) prepared by WCBC (2018) identified the need and demand for employment land over the plan period. The ELR identified that much of the existing employment land supply was undevelopable due to ecological constraints or was being held for the expansion of existing firms or alternative uses. The ELR concluded and recommended that additional land should be identified for employment development.

Background Paper BP3 Key Strategic Sites (BP3) (2016)

Background Paper BP3 *Key Strategic Sites* (BP3) was prepared to support the Preferred Strategy (PS) stage of the LDP and provides further detail and context to the two Key Strategic Site (KSS) allocations and the preferred area of search identified in the PS. BP3 sets out that the employment area of search identified in the PS has been informed by the findings of both the Joint Wrexham and Flintshire Employment Land Review and Background Paper 5: *Wrexham Industrial Estate Site Expansion Selection Paper* (2016).

The site assessments set out the site constraints for the application site, KSS3 (Land North of Bryn Lane), and these are: ecology, sand and gravel protection area and trees and hedgerows. There is no reference to heritage or archaeological constraints. However, heritage and archaeological constraints were considered within this document in relation to other sites, such as KSS1 (Lower Berse Farm).

Background Paper 5: Wrexham Industrial Estate Site Expansion (BP5) (2016)

Background Paper BP5 *Wrexham Industrial Estate Site Expansion Selection* formed part of the evidence base for the draft LDP. The paper looked at options for the expansion of Wrexham Industrial Estate. Paragraph 3.1 of BP5 states "it is appreciated that any further expansion of the Wrexham Industrial Estate is likely to have environmental, visual, or other impacts". The paragraph continues to explain that in accordance with TAN 23, planning authorities considering a site allocation for employment land that could cause harm to the environment or social cohesion should consider whether there are any alternatives where development would cause less harm, the number of jobs which could be accommodated and the spatial merit, e.g. would development contribute to policy objectives.

In terms of alternative sites, paragraph 3.2 of BP5 sets out that the need is specifically at Wrexham Industrial Estate and the site selection process undertaken ensured that the proposed sites would cause the least harm.

Following consideration of a range of factors, two search areas (A & B), were considered to initially offer the best potential for a possible expansion area to Wrexham Industrial Estate. Search Area A within BP5 is the KSS3 allocation and Search Area B is to the southwest of Wrexham Industrial Estate.

No reference is made in the presence of heritage and archaeological features which could constrain development at these sites.

BP5 concludes that following assessments carried out and the consultations undertaken, WCBC considered that the lower quality agricultural land in Area A offers the best potential for accommodating a new extension to Wrexham Industrial Estate.

Paragraph 5.21 of Background Paper 5 sets out that the focus on the expansion area, which is now known as allocation KSS3 (the application site), was for the following reasons:

- Proximity to the recently upgraded road;

- Proximity to the existing built up area which forms a logical extension to Wrexham Industrial Estate and offers potential to reduce the overall visual impact;
- Absence of any significant constraints; and
- Potential to link ecological mitigation into the overall Wrexham Industrial Estate green network.

Paragraph 5.23 of BP5 continues to state that “the site comprises 39 ha, of which 10.5ha is for ecological mitigation and to act as a buffer between the residential properties and the edge of the developable areas of the site. The remainder (28.5 ha) is the developable area.”

The key material planning considerations which were identified with the allocation were:

- Residential amenity;
- Ecology and trees;
- Landscape impact;
- Highways and access;
- Drainage and flooding;
- Minerals;
- Land ownership; and
- Planning history.

In regard to landscape impact, paragraph 5.29 states “retention of perimeter hedgerows and trees and landscaping associated with the ecological mitigation combined with building design principles such as the use of recessive colours to elevations and appropriate siting to avoid noise and visual intrusion to sensitive receptors could be used to reduce the overall landscape impact”.

This resulted in the proposed allocation of the application site, under Policy SP11, employment allocation reference ‘KSS3 – Land to the north of Bryn Lane, Wrexham Industrial Estate’.

No reference was made to heritage and archaeological constraints at the site in document BP5. It is therefore clear that the heritage and archaeological constraints raised by CPAT in August 2023 were not considered as a constraint in the site selection process undertaken by WCBC.

The site selection process undertaken by WCBC has clearly followed a robust approach, as the LDP has been found sound by an Inspector and endorsed for adoption. The site assessments relating to KSS3 did not make reference to heritage or archaeological constraints, however these were considered in the assessment of other sites. Therefore it is clear that at the time the allocations were selected, no issues were raised relating to heritage or archaeology at the application site.

Landscape

Emerging LDP Policy EC5 sets out that priority is given within Special Landscape Areas (SLA) to the conservation and enhancement of the landscape. In support of this WCBC instructed a review of the existing SLA areas within their administrative area¹.

SLAs are non-statutory designations to protect areas of landscape considered to have value and therefore are worthy of protection. The assessment and evaluation criteria used in the report included a review of cultural landscape and historic landscape, including landscape characteristics, qualities, features, and rarity, and included a review of Natural Resources Wales Landmap, verified by field evaluation.

¹ WCBC 2017, *Special Landscape Areas Study*, Wrexham County Borough Council

The report reviewed existing SLAs and included several amended or new SLA areas. The application site was not designated as or included within a Special Landscape Area and is therefore not subject to the SLA management policies. Therefore, the site has been assessed by WCBC and is not considered to warrant landscape protection in relation to the ridge and furrow which is present, and this is further reinforced by the proposed allocation for employment development at the site.

The Landscape and Visual Impact Assessment submitted as part of this planning application identifies that the application site is on the boundary between National Landscape Character Area (NLCA) 13 *Deeside and Wrexham* and NLCA 14 *Maelor*. Within NLCA 14 *Maelor* there are medieval ridge and furrow field systems which add a time depth to the landscape.

However, the application site and its setting are considered to only be slightly representative of NLCA 14 *Maelor* and more closely aligned to the character of NLCA 13 *Deeside and Wrexham*.

Overall, the LVIA concludes that impacts upon the landscape character areas as a result of the proposed development, during both construction and the operational periods, are not significant in EIA terms.

Heritage Assessment

The Heritage Impact Assessment (HIA) which was submitted in support of the planning application considers the impact of the proposals upon the ridge & furrow system. This is detailed further in **Appendix 1**.

The HIA identified the ridge and furrow areas as being non-designated heritage assets, of low historic and evidential significance. The HIA concludes that the impact upon the ridge and furrow historic assets would be of low significance.

Summary

Site Selection and Need

As set out throughout this letter, WCBC has established a clear need for the expansion of Wrexham Industrial Estate and undertook a robust site selection process in order to establish the allocation at Land North of Bryn Lane, KSS3. The LDP site selection process considered a range of factors, including heritage and archaeology and this was not raised as a constraint for the KSS3 allocation, although was a consideration for other sites which have also since been allocated.

Due to the proposed allocation of the site in the LDP, there is implied acceptance of the loss of this site in its current form. WCBC applied a thorough approach to site selection, and this site, KSS3, has been selected as the WCBC preferred option, and this has been endorsed by the Inspector.

The ELR has set out the need for further development around Wrexham Industrial Estate, and therefore the need for a site of this size is present. If the scheme is not delivered to the full extent of the allocation, WCBC will need to find an equivalent employment site elsewhere in the Borough which will cause less harm, deliver the same quantum of employment land and also comply with the wider policy objectives.

As shown in attached drawing at **Appendix 2** (dwg. ref. 22136-SGP-ZZ-ZZ-DR-A-111022), if fields 5 and 6 were excluded from the development to be preserved in situ, as requested by CPAT, a large part of the allocation would be undevelopable. This would have a significant impact on the deliverability of the scheme and will remove the ability to deliver the 2 no. larger units which are proposed, as shown on the submitted Illustrative Masterplan (and for which there is market interest).

Planning Balance

In accordance with legislative and planning policy requirements, special regard has been had to the heritage impacts of the proposed development and the desirability of preserving assets, their setting and any features of special architectural or historic interest.

The application also considers the impact of the proposed development upon landscape character areas.

Harm to heritage assets has been considered and minimised where possible, in accordance with Planning Policy Wales and the adopted and draft Local Plans.

The limited heritage impacts in relation to ridge & furrow (low significance of impacts identified in the HIA) and the mitigation measures proposed have been considered against the numerous and far-reaching benefits of the proposed scheme. In considering this planning balance, we do not agree with CPAT's view that the ridge & furrow areas should be preserved in situ. We do not consider that there is sufficient justification to amend the proposed development to remove large sections of the allocation in order to preserve a non-designated heritage asset of low significance.

REQUIREMENT FOR TRIAL TRENCHING

CPAT has requested further assessment of the sub-surface potential of the development area through a scheme of investigative trial trenching, which is requested pre-determination of the application.

TAN 24 states that the need for a field evaluation should be discussed with the local planning authority prior to submission of an application (para. 4.8). This was not raised by CPAT or WCBC prior to the submission of the application was only been requested by CPAT in August 2023.

Regardless, the Applicant is committed to undertaking this work; however given the lead in time and timescale requirements for this work it is considered that this could be secured via a planning condition to be undertaken prior to commencement of the development, rather than pre-determination.

The HIA which was submitted as part of the application concludes that the application site is assessed as having a low potential to include as yet unknown archaeological remains, and that any such remains are likely to be of low heritage significance (para. 6.45). Although the potential is low, the HIA recommends that a trial trench survey be undertaken as a pre-construction condition. The purpose is to help to confirm the 'negative' areas of the geophysical survey which has already been undertaken in relation to the site. The HIA notes that the scope of the trial trenching should be commensurate with the low archaeological potential and the scale of impact of development.

A strategy is also proposed in the event that archaeological remains are identified during the survey, including targeted excavations to ensure sufficient investigation and recording.

As the Applicant has carried out a HIA and Geophysical Survey in relation to the application site, as requested by CPAT during consultation, we do not consider that the trial trenching – which is required to address low potential for remains of likely low heritage significance – is needed in order to determine the planning application.

The Applicant will carry out the trial trenching, ensuring this is done pre-commencement (to be secured via a planning condition) and is committed to agreeing a Written Scheme of Investigation with CPAT as soon as possible.

The Applicant would accept the proposed condition if the trigger is amended to be pre-commencement as opposed to pre-determination.

IMPORTANT HEDGEROWS

CPAT identify that the proposed development will result in the loss of Important Hedgerow and that this should be considered as part of the determination of the application.

Applicant Response

The submitted HIA assessed the impact of the proposed development upon Historic Hedgerows (Appendix C). This recognises that the need to minimise the loss of the hedgerows has been a determining factor in the resulting design of the proposed development. Important hedgerows have been retained where possible, including those along the application site boundaries and through the creation of an ecological corridor.

To mitigate the loss of Important Hedgerows, the HIA recommends preservation through record via a targeted archaeological survey, which can be secured via an appropriately worded planning condition.

The heritage impacts of the proposed development are one factor when considering the planning balance of the scheme and should be considered against the wider benefits.

The benefits of the scheme include:

- The creation of approximately 90 gross construction jobs (Full Time Equivalent (FTE)) (24 net construction FTE jobs);

- The development of modern, high quality employment space to attract new occupiers to Wrexham Industrial Estate and allow existing occupiers to remain on the Industrial Estate and expand;
- The development of a hotel to strengthen the visitor offer and potential retail/drive-thru/petrol station facilities for employees and visitors to the wider Industrial Estate, reducing the need to travel;
- Proposed HGV parking area to address issues associated with informal HGV parking around the Industrial Estate;
- The development of green infrastructure, including net additional planting of trees and hedgerows, and additional ponds to support local biodiversity;
- Minor beneficial effects upon habitats and species as a result of the proposed landscaping strategy;
- Creation of a wellness trail around the site, linking to the existing Public Right of Way network;
- The development of a site which is a sustainable and logical extension to the Industrial Estate, ensuring accessibility via non-car modes including cycle facilities and nearby public transport connections; and
- The creation of between 1,166 and 3,352 gross operational jobs (FTE) (between 306 and 880 net operational FTE jobs), which is anticipated to have a moderate beneficial effect.

Given the limited heritage impacts and the mitigation measures proposed, it is considered that the application should not be refused on heritage grounds.

We would welcome a further discussion with WCBC and CPAT regarding the requirement for trial trenching and the request for this to be secured via a pre-commencement planning condition.

If there are any immediate queries, then please do not hesitate to contact me in the first instance.

Yours sincerely

Helen Clarkson
Associate Director – Planning & Development

APPENDIX 1 – RIDGE & FURROW TECHNICAL NOTE (TEP)

Land North of Bryn Lane, Wrexham - Ridge & Furrow Technical Note

Project	Land North of Bryn Lane	Author	Amir Bassir BSc PGCert MCIfA
Date	14/11/2023	Checked	Franki Webb BA (Hons), PGDip, MA MCIfA
Doc Ref	9134.02.006	Approved	Jason Clarke BSc (Hons) MA MCIfA
Version	1.2	Purpose	Technical note addendum to Heritage Impact Assessment

1.0 Introduction

- 1.1 This technical note has been produced in response to comments received from CPAT (24th August 2023) in relation to application reference P/2023/0497 (hybrid application for proposed employment uses at Land North of Bryn Lane).
- 1.2 This technical note comprises an addendum to a Heritage Impact Assessment (HIA) (TEP 2023¹) and should be read in conjunction with that report. It provides a further comment of the ridge and furrow remains present within the application site, including their heritage significance, contribution to historic landscape character, and an assessment of the likely impact of development.
- 1.3 An initial HIA informed the Applicant's EIA scoping request (reference ENQ/2022/0328)² and included an overview of the historic background of the proposed development site including a review of available cartographic evidence, Historic Environment Record (HER) data, LiDAR and aerial views, supported by an archive visit and walkover survey of the site. The HIA was supported by a geophysical survey³ of the application site (WYAS 2022) and was updated following receipt of the final Scoping Opinion (24/05/2023).
- 1.4 The desk-based research, site visit and geophysical survey were used to assess the extent and heritage significance of ridge and furrow present within the application site, and the likely impact of development on the heritage significance of the ridge and furrow.

¹ TEP 2023, *Land North of Bryn Lane, Wrexham, Clwyd, Heritage Impact Assessment*, The Environment Partnership (TEP) Ltd, 9134.02.003

² CBRE 2022, *Request for an EIA Scoping Opinion for Land North of Bryn Lane, Wrexham Industrial Estate*

³ WYAS 2022, *Land North of Bryn Lane, Wrexham, Clwyd, Geophysical Survey*, West Yorkshire Archaeological Services

2.0 Policy

Statutory Legislation

2.1 The statutory legislation most relevant to this report comprises;

- **Historic Environment (Wales) Act 2016:** This Act provides amendments to the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990 for the protection and management of the Welsh historic environment. It also contains new stand-alone provisions relating to historic place names, historic environment records and the establishment of the Advisory Panel for the Historic Environment in Wales.

National Planning Policy

2.2 **Planning Policy Wales (PPW) Edition 11 (2021)** provides the national planning policy framework for the consideration of the historic environment and is supplemented by guidance in Technical Advice Note 24 and Cadw best practice guidance. The historic environment is discussed in Chapter 6: Distinctive and Natural Places, which recognises the importance of such areas and features to the Country.

2.3 Chapter 6 states that the “*special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right*” (para. 6.0.2).

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

2.5 Paragraph 6.1.26 provides further details stating “*Where archaeological remains are known to exist or there is a potential for them to survive, an application should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to allow a full understanding of the impact of the proposal on the significance of the remains. The needs of archaeology and development may be reconciled, and potential conflict very much reduced, through early discussion and assessment.*”

2.6 Paragraph 6.1.27 states “*If the planning authority is minded to approve an application and where archaeological remains are affected by proposals that alter or destroy them, the planning authority must be satisfied that the developer has secured appropriate and satisfactory provision for their recording and investigation, followed by the analysis and publication of the results and the deposition of the resulting archive in an approved repository.*”

2.7 **Technical Advice Note (TAN) 24:** the historic environment (2017) provides guidance on how to consider the historic environment in development plans and planning decisions. It provides support for the policies in PPW.

- 2.8 Guidance on the Setting of Historic Assets (paragraphs 1.23 to 1.29) discusses what constitutes the setting, and what factors can be included to consider within an assessment.
- 2.9 Section 4 addresses the management of archaeological remains, noting that they are a finite and non-renewable resource and their conservation is a material consideration in determining a planning application. The guidance states that *"in cases involving less significant archaeological remains, local planning authorities will need to weigh the relative importance of the archaeological remains and their settings against other factors, including the need for the proposed development"* (paragraph 4.2).
- 2.10 Paragraph 4.3 states that *"Where development might reveal, disturb or destroy archaeological remains ... it is important that the opportunities to record archaeological evidence are taken and that archaeological remains are not needlessly destroyed"*.
- 2.11 Paragraph 4.7 states that *"Where archaeological remains are known to exist, or considered likely to exist ... the local planning authority should ask an applicant to undertake a desk-based archaeological assessment and, where appropriate, an archaeological evaluation"*.
- 2.12 Paragraph 4.8 continues *"The need for a desk-based assessment, and field evaluation where appropriate, should be discussed with the local planning authority prior to submission of a application, and where required the results of these studies should be submitted as part of the planning application. Failure to provide sufficient archaeological information of the appropriate standard may be a valid reason for the local planning authority to refuse planning permission"*.
- 2.13 Paragraph 4.10 states that *"The case for the preservation of archaeological remains that are not considered to meet the criteria for national importance, must be assessed on the individual merits of each case. The local planning authority must take into account relevant policies and material considerations, and will need to **weigh the significance of the remains against the benefits of and need for the proposed development**"*.

Local Planning Policy

Wrexham Unitary Development Plan 1996-2011. Adopted Feb 2005

- 2.14 The Wrexham Unitary Development Plan (WUDP) 1996-2011 outlines the Council's broad intent for development in the area and provides a framework for the more specific policies and proposals.
- 2.15 The following policies relate to the historic environment and are relevant to this report:

EC11 Archaeology
- 2.16 Development which would adversely affect the site or setting of a Scheduled Ancient Monument or archaeological site of national significance will not be permitted. Development that directly affects non-scheduled sites of archaeological importance

will only be permitted if an archaeological investigation has been carried out to determine the nature, extent and significance of the remains, and this investigation indicates that in-situ preservation is not justified, and a programme of excavation and recording has been agreed. Development will also be carefully controlled to ensure that the setting of non-scheduled sites of archaeological importance is not harmed where appropriate.

Wrexham Local Development Plan 2 (LDP2) 2013-2028

- 2.17 Wrexham County Borough Council (WCBC) are preparing a Local Development Plan (LDP) which will replace the current adopted Unitary Development Plan. The LDP is a land use plan that sets out the planning requirements for achieving sustainable development in the Borough over the period 2013-2028. WCBC 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.

- 2.18 The following policy relates to the historic environment and is relevant to this report:

Policy SP16: Historic and Cultural Environment

- 2.19 Development will only be supported where it conserves, protects, and enhances cultural and heritage assets of the Borough and, their settings including archaeological remains.

Policy SP16 notes that “Where development would directly affect non-designated archaeological remains it will be important to undertake archaeological investigation to determine the nature, extent and significance of the remains. This process will help determine whether in-situ preservation and a programme of excavation and recording will be needed. The desirability of preserving archaeological remains and its setting is a material consideration in determining planning applications”.

- 2.20 The application site forms a land allocation within the emerging LDP (KSS3) which comprises *Policy SP11: KSS3: Land to the north of Bryn Lane, Wrexham Industrial Estate*.

- 2.21 The allocation purpose is described as:

...to deliver 28ha of employment land for B use class purposes including an ecological network and residential buffer zone along with enabling and necessary infrastructure which will be delivered in a phased manner with specific details tied into planning consents...

- 2.22 The policy sets out site specific requirements associated with the delivery of KSS3 and includes figure 7 ‘KSS3 Masterplan Framework’ which illustrates parameters for delivery. The allocation size of 28 hectares is described as in-line with the amount of land recommended by the Employment Land Review (ELR). The policy recognises that the allocation site is of ecological value and includes ecological mitigation. No heritage or archaeological mitigation is included as part of the Policy.

- 2.23 The Wrexham LDP Inspector's Report⁴ concluded that the LDP provides an appropriate basis for the planning of the County Borough and the Council has sufficient evidence to support the strategy and that the Plan meets the legislative requirements and the tests of soundness in the Development Plans Manual edition 3. The report notes that extensive stakeholder engagement was undertaken as part of the plan preparation process. The report addresses individual allocations only where there were questions of soundness of where there has been a significant level of objection. KSS3 is not individually assessed. Consultation with CPAT as part of the LDP development process is evident in *Site 16 Land north and south of Rosett Road* for which CPAT confirmed that no further investigations were required and there was no objection to development.

⁴ Report on the Examination into the Wrexham Local Development Plan 2013-2028

3.0 Ridge and Furrow

- 3.1 The prevalence of ridge and furrow earthworks within the study area attest to its largely agricultural character with small settlements and isolated farmsteads surrounded by large areas of open fields. Place name and documentary evidence such as charters for nearby settlements such as Holt, Ridleywood and Isycoed, suggest that the settlements began during woodland clearances and were developed during the medieval period.
- 3.2 The dominant method of farming during the medieval period was based on large fields, known as open fields, in which individual yeomen or tenant farms cultivated strips of land. Open fields were prevalent in the flatter and more arable central counties and the method of strip farming reflected communities' shared use of ploughs and oxen teams. Ridge and furrow earthworks represent the physical evidence of the ploughing method in which the oxen team would travel in linear strips, turning the soil in one direction and returning in the opposite direction down another strip. Over time this resulted in the build-up of distinctive ridges and furrows, often with elongated S curves where the oxen were turned. Each narrow strip is called a 'land' and these are grouped into 'furlongs'. Furlongs varied in size and could lie perpendicular to each other, parallel, or at various angles as dictated by topography or other landscape constraints. Furlongs and open fields were not defined by hedgerows which were primarily introduced during the post-medieval Parliamentary enclosures process and frequently ignored preceding land divisions to create large straight-sided fields better suited for pasture.
- 3.3 The earliest available historic maps of the study area are Tithe Maps dating to 1843, which confirm an agricultural landscape that by this time had been enclosed with planted hedgerows to form fields. In some instances the enclosed fields appear to preserve the pattern of earlier open field furlongs, though the medieval cultivation practice had been superseded by this date. Many of the fields include marl pits or ponds associated with the agricultural practice of 'marling'; these are likely to post-date the ridge and furrow agricultural regime and date from the 17th century at which time there was an increase in the practice of marling.
- 3.4 Within the application site there are three areas in which ridge and furrow is visible as shallow earthwork remains (fields 5, 6, and 7, see Appendix drawing G9134.02.007). Modern ploughing has eroded the above ground evidence for ridge and furrow elsewhere within the application site, but their presence as sub-surface remains was confirmed through geophysical survey.
- 3.5 Map regression demonstrates that several hedgerows have been removed throughout the application site to create larger fields. Field 5 is the only field within the application site in which the current land boundaries enclose the extent of the furlong as confirmed by the S curves which are respected by the existing boundaries. However, the hedgerows themselves are not contemporary with the ridge and furrow which they enclose since open field furlongs would not be physically demarcated.
- 3.6 In field 5 which represents the better surviving example of ridge and furrow earthworks the ridges are approximately 6m apart from centre to centre and have an estimated

maximum depth to the base of the furrow of <0.5m. Lidar and aerial views clearly show the presence of characteristic shallow S curves as each ridge / furrow terminates.

4.0 Heritage Significance

- 4.1 As historic assets the areas of ridge and furrow have been assessed as being of low heritage significance, being locally important resources. This assessment of heritage significance has not been contested by CPAT. The visible ridge and furrow earthworks have historic and evidential value relating to the history and development of the area and medieval agricultural practices. Geophysical survey of the application site has demonstrated that superficial or sub-surface ridge and furrow remains are present across much of the application site however these remains are not tangible as landscape features.
- 4.2 The three areas of ridge and furrow are identified in the HIA report as:
- **NDHA12** – Land north of Bryn Lane, Ridge and Furrow 1, an area of east-west aligned S curved ridge and furrow occupying the majority of the field and visible on aerial views and on the ground.
 - **NDHA13** – Land north of Bryn Lane, Ridge and Furrow 2, an area of east to west aligned ridge and furrow occupying the majority of the field and visible on aerial views and on the ground.
 - **NDHA14** – Land north of Bryn Lane, Ridge and Furrow 3, an area of ridge and furrow occupying the majority of the field and visible on aerial views and on the ground. The western side of the field includes East to West ridge and furrow and in the east side they are aligned North to South.
- 4.3 An HER search was carried out as part of the HIA which included records for several areas of ridge and furrow within the 1km study area (NDHA1-10). These were assessed as being of low (local) heritage significance within the HIA report; this assessment of heritage significance has not been contested by CPAT.
- 4.4 The area of the application site and surrounding area which includes the historic townships of Holt and Ridley Wood has been assessed by CPAT as comprising a Historic Landscape named Commonwood (WRXHMHL18⁵) which is described as
- 4.5 *“An area of mixed sized but predominantly regular fields occupying part of the western river terrace of the Dee... The fields divide roughly equally into groups of smaller residual medieval strip fields, adjoining medieval settlements such as Holt, and blocks of larger fields representing areas of 18th or 19th enclosure - possible once areas of common... The area is characterised by numerous water-filled marl pits, land drains running east towards the river and a significant number of small farm complexes, probably of later medieval or post medieval origin... The areas only significant settlement is the relatively modern Cross Lanes... Several park fieldnames survive*

⁵ [Landmap Portal \(naturalresources.wales\)](http://Landmap Portal (naturalresources.wales))

across the area that may hint at former land-use, There are also a number of small areas of deciduous woodland... A scatter of Bronze Age barrows and standing stones are the sole representatives of the area's prehistoric past".

- 4.6 The character area survey was undertaken by Clwyd-Powys-Archaeological Trust and the associated survey / assessment date is 06/11/2007. Other classifications important to the historic pattern of the area are listed as irregular fieldscapes, designed landscapes, woodland and horticulture.
- 4.7 The evaluation matrix of the character area survey assesses several criteria to describe an overall evaluation:
- Integrity: Outstanding – Significant areas of ridge and furrow retained by modern field patterns
 - Survival: High
 - Condition: High
 - Rarity: Outstanding - Nationally rare concentration of ridge and furrow field systems
 - Potential: Outstanding – An exceptional resource
- 4.8 The justification of overall evaluation provided in the character area survey notes: “A large and uniformly patterned area with excellent distribution and survival of post medieval and medieval ridge and furrow field systems”. The assessment does not include details for existing management of the area.
- 4.9 The emerging LDP includes Policy EC5 in which priority is given within Special Landscape Areas (SLA) to the conservation and enhancement of the landscape. In support of this Wrexham County Borough Council instructed a review of the existing SLA areas within their administrative area⁶. SLAs are non-statutory designations to protect areas of landscape considered to have value and therefore are worthy of protection. The assessment and evaluation criteria used in the report included a review of cultural landscape and historic landscape including landscape characteristics, qualities, features, and rarity, and included a review of Natural Resources Wales Landmap, verified by field evaluation. The report reviewed existing SLAs and included several amended or new SLA areas. The Commonwood character area was **not** designated as or included within a Special Landscape Area and is not subject to the SLA management policies.

⁶ WCBC 2017, *Special Landscape Areas Study*, Wrexham County Borough Council

5.0 Assessment of Impact

- 5.1 Development associated with the construction of Units 1 and 2 (Illustrative Masterplan) is likely to result in the complete removal of upstanding ridge and furrow remains noted in those areas of the application site (NDHA12-14).
- 5.2 The cut and fill strategy for the application site proposes that the eastern fields, including 5 and 6, will be in an area of fill, however this will require a preliminary topsoil strip of approximately 300mm depth which would directly impact on the ridge and furrow.
- 5.3 As non-designated historic assets the ridge and furrow earthworks within the application site have intrinsic heritage value assessed as low (local) heritage significance, and also contribute to the wider historic landscape character, providing a positive contribution to the identified historic landscape of Commonwood (WRXHMHL18).
- 5.4 The landscape character of Commonwood is derived from several elements including ridge and furrow. Other historic features that contribute to the character of the area are noted to include medieval settlements, areas of 18th and 19th century enclosure, marl pits, small farm complexes, field names, woodland, and prehistoric barrows and standing stones.
- 5.5 Whilst ridge and furrow is a significant contributor to the assessed Outstanding value of the landscape, the value is derived collectively from across the landscape area. The removal of ridge and furrow within the application site would have a minor negative impact on the heritage value of the wider Commonwood landscape character area. This impact is limited as this value is derived from areas of ridge and furrow surviving throughout the totality of character area. It is not considered that the removal of ridge and furrow within the application site would reduce the character area's overall assessed 'Outstanding' value.
- 5.6 The ridge and furrow earthworks within the application site are assessed as being of low (local) heritage significance. The proposed development will have a high magnitude of effect, resulting in complete removal of the ridge and furrow. The significance of effect would be low, as detailed in the submitted HIA.
- 5.7 Comments provided by CPAT include a requirement to assess the impact of development on Important Hedgerows. This has been addressed in the HIA and an accompanying Historic Hedgerow Impact Assessment technical note (TEP ref 9134.02.005).

6.0 Consultation

- 6.1 Preliminary consultation was carried out by TEP with the Development Control Archaeologist at Clywd Powys Archaeological Trust at the commencement of the project. TEP's consultation request (Bassir, email 17/12/2021) stated that the outline application comprised the draft employment allocation KSS3 and that the review would comprise a 1km study area including an HER search and site visit. The consultation request highlighted that a small number of designated historic assets were present, as well as non-designated historic assets including an aircraft crash site, historic hedgerows, and that ridge and furrow remains were present in many of the fields in the study area.
- 6.2 CPAT's response (Walters, email 04/01/2022) agreed with the highlighted constraints and noted that further research would be required for the aircraft crash site and that several hedgerows may be considered as Important in accordance with the Hedgerow Regulations Act 1997. CPAT requested that a Heritage Impact Assessment (HIA) be undertaken in accordance with Cadw best practice guidance. With regards the ridge and furrow CPAT noted that *"The ridge and furrow seems quite poorly preserved here on the lidar (although no coverage to the east) so we would probably not have any issues with that"*. It was requested that a Written Scheme of Investigation (WSI) for the HIA be submitted prior to the walkover survey and a geophysical survey of the site was recommended to assess the subsurface potential of the application site.
- 6.3 A WSI for the HIA was produced in January 2022 which set out TEP's proposed approach to the assessment. The WSI noted that *"The area surrounding the site contains numerous remains of medieval ridge and furrow, demonstrating intensive agricultural use during that period"*. The document noted that the work was to inform an outline application for the KSS3 employment allocation site and included a plan with the red line boundary. The WSI was submitted via email to CPAT on 09/06/2022 and was approved by CPAT the same day.
- 6.4 Following completion of the HIA and geophysical survey TEP provided Historic Environment input to an EIA Scoping report as a topic where potential for significant effects is not anticipated. The report noted that *"The area surrounding the application site contains numerous cultivation remains of medieval to post-medieval ridge and furrow earthworks which demonstrate intensive agricultural use of the landscape during these periods. Aerial views and available partial LiDAR data indicate the presence of three areas of ridge and furrow within the application site and demonstrate that some of the present field boundaries conform with the medieval landscape pattern. Modern ploughing appears to have levelled any ridge and furrow remains across most of the application site."* The scoping report did not include ridge and furrow as a key issue and concluded that the assessment of effects on built heritage and below-ground archaeology would be scoped out of the Environmental Statement but would be included within a stand-alone heritage assessment report.
- 6.5 A Scoping Opinion was received from the Senior Planning Archaeologist at CPAT which noted the results of the HIA and geophysical survey (Walters, email 07/12/2022). With regards the ridge and furrow the comment stated *"We have received a copy of the geophysical survey report and we are in agreement that no*

significant anomalies other than a former ridge and furrow field system of medieval and post medieval date are present. There appear to be no earlier features than the field system in the results although to some extent the field system ridging will mask earlier features that may be present". The scoping opinion requested that the HIA state mitigation where historic hedgerows may be impacted but did not request mitigation for the ridge and furrow or provide recommendations for preservation in situ or any requirement for further assessment.

- 6.6 The final scoping opinion (Philips, 24/05/2023) included consultation with Cadw and CPAT and confirmed that the effects on the historic environment could be excluded from the Environmental Statement. The scoping opinion specified that an assessment of the impact of the development on historic hedgerows should be included within the scope of a HIA. No comments regarding ridge and furrow remains were included.
- 6.7 Following receipt of the scoping opinion the HIA was updated and a Historic Hedgerow Impact Assessment was produced⁷. The HIA recorded that three areas of visible ridge and furrow are present within the application site which would likely be completely removed by the proposed development. The remains were assessed as being of low (local) heritage significance and that the magnitude of effect of development will be high. The significance of effect would be low.
- 6.8 The Applicant's planning consultant, CBRE Limited, consulted CPAT as part of the Pre-Application Consultation process, which included the application submission documents (including the HIA) being available for review and comment between the 19th June and 17th July 2023. CPAT did not respond to this consultation.
- 6.9 A consultation email on the hybrid application by the Senior Planning Archaeologist at CPAT (Walters, email 24/08/2023) noted that the application site included areas of ridge and furrow which would receive direct impact from the proposed application and stated that *"Consideration should be given to removal of Fields 5 from the development proposal to preserve these earthworks which retain a characteristic curved profile and plan and are clearly related to similarly well-preserved earthworks adjoining the field to the east which can be seen on the lidar"*.
- 6.10 An additional response from CPAT regarding their position on the ridge and furrow (Email from WCBC, 25/09/2023) includes *"It is perfectly reasonable at the Outline or Full application stage to expect adjustments in proposed layouts to preserve significant archaeology identified by assessment. Our advice on this regarding the preserved medieval field system earthworks and the historic hedgerows must be taken seriously by the applicant/agent and a revised layout must be considered. Failure to do this may result in an objection"*.
- 6.11 It is considered that the consultation process associated with the project has been thorough and has provided an opportunity for CPAT to comment on the anticipated direct and in-direct impacts of the proposed development upon archaeological remains. The presence of ridge and furrow within the study area and site has been

⁷ TEP 2023, *Land North of Bryn Lane, Wrexham, Clwyd, Heritage Impact Assessment*, The Environment Partnership (TEP) Ltd, 9134.02.003

raised and noted throughout the consultation process however no request to preserve ridge these remains had previously been raised.

7.0 Conclusion

- 7.1 In accordance with national and local planning policy and Cadw best practice guidance the ridge and furrow remains within the application site have been assessed through desk-based survey and archaeological investigation as non-designated historic assets of low (local) heritage significance.
- 7.2 The application site forms a land allocation within the emerging LDP and includes areas of visible ridge and furrow. The LDP and allocations have been informed by an extensive evidence base and the allocation of land at Wrexham Industrial Estate has been subject to a site selection exercise to ensure that the site is appropriate in relation to environmental factors including historic environment considerations. Archaeological and heritage considerations were considered in forming the LDP and its proposed allocations which included consultation with CPAT.
- 7.3 Within the framework of KSS3 the preservation of ridge and furrow in field 5 would not be possible since these earthworks encompass the totality of that field and any development would result in some level of direct impacts to the remains. The inclusion of this field within the allocation implies an acceptance of this impact since preservation would require the removal of the field from the allocated area. The allocation policy (SP11) does not include heritage or archaeological mitigation. The LDP does not recognise the site as part of an SLA under Policy EC5.
- 7.4 The presence of ridge and furrow within the application site has been highlighted in the HIA report and archaeological evaluation report, and the EIA scoping report, and through consultation with CPAT at several stages during the project and has not previously been raised as a key issue or constraint where preservation in-situ should be considered.
- 7.5 As noted in TAN24, the case for the preservation of archaeological remains which are not of national importance must be assessed on the individual merits of each case and the local authority must weigh the significance of the remains against the benefits of and need for the proposed development. The public benefits and need for the development are outlined in Policy SP11 and should be weighed against the significance of the archaeological remains in determining the application.
- 7.6 Since preservation in-situ of these remains, which are assessed as being of low (local) heritage significance, would not be possible within the framework of KSS3, and is not considered to be warranted, the HIA included a recommendation for mitigation by preservation through record by means of a topographic survey and publicly accessible report. This would be secured as a condition of planning consent. This recommendation is proportionate to the heritage significance of the archaeological remains and the impact of the proposed development.

- 7.7 CPAT have commented that there is no necessity for additional topographic survey as the ridge and furrow are visible on LiDAR. The HIA report includes a description of the ridge and furrow remains, photographs, LiDAR mapping, and is supported by a geophysical survey report which also illustrates the extent and character of the ridge and furrow. These reports will be submitted to the HER for public access and can be considered to have provided preservation by record of the ridge and furrow remains. This is consistent with national and local policy where preservation by record should be considered where in-situ preservation of historic assets is not possible.

8.0 Appendix – Consultation

From: [Mark Walters](#)
To: [planning](#)
Cc: [Neil Maylan \(Cadw Senior Historic Environment Planning Officer\)](#); [Cadw Planning](#)
(cadwplanning@gov.wales)
Subject: P/2023/0497 Land North of Bryn Lane, Wrexham Industrial Estate, Wrexham - Hybrid Full and Outline for Industrial Premises
Date: 24 August 2023 15:18:23

Dear Sir or Madam

Thank you for the consultation on this application. We were previously consulted on the proposals at the pre-application stage and gave advice on the scope of the historic environment assessment to the archaeological consultant and to the LPA as part of a scoping opinion in December 2022. Unfortunately, since December 2022, we have had no further contact with the archaeological consultants and had expected to be consulted on the draft historic environment chapter of the ES so that identified impacts could be verified and mitigation agreed. There doesn't appear to be a specific historic environment chapter in the ES, but a Heritage Impact Assessment by The Environment Partnership (TEP), combining some elements of pre-determination assessment reporting, has been provided and it is the findings of this document that we will comment on below.

1. Pre-determination Evaluation Trenching

With regard to the Mitigation section (6.34 - 6.49) of the TEP report it is recommended in 6.47 - 6.48 that further assessment of the sub-surface potential of the development area should be completed through a scheme of investigative trial trenching. This is aimed primarily at defining the potential for archaeology which is earlier than the medieval and post medieval field systems which may have masked deeper sub-surface data on the geophysics results. As this would in effect be a further stage of pre-determination assessment designed to inform the ES and a subsequent mitigation strategy it should be completed at the pre-determination stage in accordance with:

Planning Policy Wales (Feb 2021):

Paragraph 6.1.26

Where archaeological remains are known to exist or there is a potential for them to survive, an application should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to allow a full understanding of the impact of the proposal on the significance of the remains. The needs of archaeology and development may be reconciled, and potential conflict very much reduced, through early discussion and assessment.

This means that Local Planning Authorities in Wales must take into account archaeological considerations and deal with them from the beginning of the development control process and need to be fully informed about the nature and importance of archaeological remains, and their setting, and the likely impact of any proposed development upon them.

Technical Advice Note 24 (May 2017):

Paragraph 4.7.

'Where archaeological remains are known to exist, or considered likely to exist, and a study has not already been undertaken by the applicant, the local planning authority should ask an applicant to undertake a desk-based archaeological assessment and, where appropriate, an archaeological evaluation. These should be done by a qualified and competent expert to the appropriate standard. The reports of these investigations will form part of the planning application. Applicants should show they have modified their development proposals to minimise any negative impact on the identified archaeological remains, and how they intend to mitigate any remaining negative impacts.'

The evaluation should consist of a series of 100m x 2m randomly sited trenches amounting to a 2% sample of the development area to test for the presence/absence of sub-surface archaeology. The evaluation trenching should avoid damage to the well-preserved field system earthworks in Field 5 and the eastern half of Field 6. At least one trench should be aligned north/south in Field 2 to coincide with the approximate location of the NDHA94 Francis Lane aircraft crash site and test for metallic or other crash debris. An archaeological contractor will need to be engaged to carry out this evaluation in accordance with CIFA standards and guidance for field evaluation, reporting and archiving. A WSI must be submitted by the chosen archaeological contractor and approved by us before they commence work on-site. The results will be forwarded to the applicant, LPA and Planning services section of CPAT for further comment. A standard specification for evaluation trenching, reporting and archiving is attached.

2. Ridge and Furrow Field System Earthworks - Preservation

With regard to 6.41 and the mitigation for damage to the surviving ridge and furrow field system earthworks it is clear in 4.97 of the main report that Field 5, and to a slightly lesser extent Field 6, retain well preserved surface earthworks and related hedgerow field boundaries of medieval and post medieval date. Consideration should be given to removal of Fields 5 from the development proposal to preserve these earthworks which retain a characteristic curved profile and plan and are clearly related to similarly well-preserved earthworks adjoining the field to the east which can be seen on the lidar. Well preserved ridge and furrow field systems of this type are a characteristic feature of the Wrexham Maelor rural landscape and form part of the Historic Landscape Aspect for the Commonwood landscape area on the NRW LANDMAP database. This area is defined as Outstanding and of High value for its preservation of ridge and furrow field systems which are a rare and key element of this landscape.

The lidar data in the TEP report has mapped the ridge and furrow in high detail and we would not see any need for additional topographic survey as a condition of consent as this is unlikely to resolve more detail or be as accurate in plan as the lidar.

3. Hedgerows classed as 'Important'

Appendix C of the TEP report indicates that under the Schedule 1 Part II heritage criteria of the Hedgerow Regulations 1997 practically every hedgerow within the development north of Bryn Lane is classed as 'important' and therefore 'protected'. Normally no hedgerow that is deemed to be important and protected can be removed unless the LPA has received and considered a Hedgerow Removal Notice application. Normally where hedgerows are deemed to be 'important' the LPA would issue a hedgerow retention notice and the hedges would have to be retained. It would appear the current layout would remove approximately 50% of the 'important' hedges, which will also be of ecological value, and clearly the LPA will need to comment further on this significant landscape impact.

I look forward to approving the WSI for the pre-determination evaluation trenching and receiving any revised layout proposals which seek to preserve the historic landscape archaeological components identified above and in the TEP report.

Kind regards

Mark Walters

Mark Walters

Senior Planning Archaeologist / Uwch Archeolegydd Cynllunio

Ffôn / Tel: Mobile: 07736 163148

E-bost / E-mail: mark.walters@cpat.org.uk

Ymddiriedolaeth Archaeolegol Clwyd-Powys, Y Swyddfeydd, Coed y Dinas, Welshpool, SY21 8RP, Swyddfa Gofrestredig fel yr uchod. Rhif Cwmni 1212455, Rhif Elusen 508301.

Clwyd-Powys Archaeological Trust, The Offices, Coed y Dinas, Welshpool, SY21 8RP.

Registered Office as above. Company No 1212455, Charity No 508301.

Please note that I do not work Fridays

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Mae'n bosibl nad yw'r datganiadau a'r safbwyntiau a fynegir yn yr e-bost hwn yn cynrychioli rhai Ymddiriedolaeth Archeolegol Clwyd-Powys.

Statements and opinions expressed in this e-mail may not represent those of the Clwyd-Powys Archaeological Trust.

Amir Bassir

From: Jenna.Arnold2@gov.wales
Sent: 20 January 2023 10:52
To: Matthew Phillips
Subject: RE: ENQ/2022/0328 - EIA Scoping Opinion Request

Hi Matthew,

Sorry again, here are Cadw's comments.

A scoping report produced by CBRE has been submitted along with this request for a scoping opinion. Chapter 7 of this report has considered the impact of the proposed development on the settings of the above designated historic assets and concluded that this will not be significant. As such, the impact of the proposed development on the settings of designated historic assets can be scoped out of the EIA.

The scoping report has also suggested that sufficient investigation has been carried out to determine that the proposed development will not have a significant impact on the buried archaeological resource and therefore the historic environment can be scoped out of the EIA. However, before the historic environment is scoped out of the EIA, the Clwyd-Powys Archaeological Trust should be consulted in regard to whether sufficient appropriate archaeological investigation has been carried out to prove that the proposed development will not have a significant impact on the buried archaeological resource.

Thanks
Jenna

From: Matthew Phillips <Matthew.Phillips@wrexham.gov.uk>
Sent: 19 January 2023 16:48
To: Arnold, Jenna (ETC - CST - Cadw - Casework Teams) <Jenna.Arnold2@gov.wales>
Subject: RE: ENQ/2022/0328 - EIA Scoping Opinion Request

Jenna,

Yes please.

Regards

Matthew Phillips

Pennaeth Dros Dro'r Gwasanaeth Polisi Cynllunio/Interim Head of Service Planning Policy
Economi a Chynllunio/Economy and Planning

From: mark.walters@cpat.org.uk
Sent: 07 December 2022 12:18
To: Matthew Phillips
Subject: [DKIM:INVALID] Re: ENQ/2022/0328 Land off Francis Lane and Bryn Lane, Wrexham Industrial Estate - Historic Environment Scoping Opinion

Dear Matthew

Thank you for the consultation on the scoping opinion for the EIA at this development site.

We note the content of 7.1 (Historic Environment) in the scope which includes the outline results of a completed DBA and geophysical survey.

We have received a copy of the geophysical survey report and we are in agreement that no significant anomalies other than a former ridge and furrow field system of medieval and post medieval date are present. There appear to be no earlier features than the field system in the results although to some extent the field system ridging will mask earlier features that may be present. Overall though the archaeological potential based on the geophysical results does seem to be low.

The key direct impact identified by the DBA would be the removal of any historic hedges. It is clear that most of the hedges surviving here formed part of a pre 1843 field system (7.1.13) and one also forms part of a historic township boundary (7.1.14). This is also supported by the geophysical survey which shows the degraded remains of a ridging system within former hedgerow boundaries across the whole development site. These hedges would therefore be classed as 'important' under the Hedgerow Removal Regulations 1997 under the cultural criteria. Every effort should therefore be made to retain the historic hedgerows within any future development layout and maintain them.

With regard to the WWII aircraft crash location (7.1.17 and 7.1.20) we contacted a local researcher who has completed extensive ground and documentary studies on aircraft crashes in the Wrexham area and he confirms that the crash was a US Curtis Tomahawk fighter plane AN892. This appears to have been a surface crash on the field with all of the remains being recovered and this was confirmed by an eyewitness who saw the plane being dismantled and the fuselage being driven off-site. The potential for intact aircraft remains therefore seem low, but a contingency should be built into the project for unexpected remains and the requirements of the Protection of Military Remains Act for licenced recovery of any remains that may be found.

We agree that the assessment of indirect effects on the built heritage can be scoped out of the EIA and that a HIA will be included. The HIA should use the Cadw guidance on Managing the Setting of Historic Assets in Wales (which includes a setting assessment methodology) as well as the Cadw Conservation Principles (2011) in reaching its conclusions.

We agree that the assessment of effects on below ground archaeology can be scoped out of the EIA and that a HIA will be included which addresses these impacts.

The above ground impacts to the historic hedgerows will need to be scoped into the assessment and included within a HIA. Mitigation must be stated where historic hedgerows may be impacted.

Best regards

Amir Bassir

From: Amir Bassir
Sent: 09 June 2022 12:17
To: Mark Walters
Subject: RE: Land at Bryn Lane, Wrexham - Archaeological Assessment
Attachments: XF93_RAMs.pdf; Land north of Bryn WSI v2.pdf

Categories: Saved to TEPSP13
SharePointLocationUrl: <http://tepsharepoint2013/sites/TEP1/9134.02/Emails>
SharePointAbsoluteFileUrl: http://tepsharepoint2013/sites/TEP1/9134.02/Emails/RE_Land at Bryn Lane_Wrexham - Archaeological A_su8y7z.msg

Good afternoon Mark,

I hope that you are keeping well,

Further to our previous correspondence please find attached a WSI and RAMS for undertaking a geophysical survey of the Bryn Lane site. The survey team are scheduled to carry out this work on the 20th June so if you have any comments on the documents please let me know and I will address these as soon as possible.

Kind regards,

Amir Bassir (BSc (Hons) PG Cert MCIfA)
Senior Historic Environment Consultant

07341 563780 (Mobile)

From: Mark Walters <mark.walters@cpat.org.uk>
Sent: 04 January 2022 15:13
To: Amir Bassir <AmirBassir@tep.uk.com>
Subject: Re: Land at Bryn Lane, Wrexham - Archaeological Assessment

Dear Amir

Thank you for the early consultation on this development proposal area.

As the scheme develops it would be useful to have a red boundary plan showing the extent and any early indicative layout so that we can comment further. From the grid ref. alone it is quite difficult to provide targeted advice.

We would agree with what you have currently identified in terms of constraints in these fields. In terms of the aircraft crash site more work would need to be done on accurately locating this site which is likely to be inaccurate on the HER. The RAF air crash records held (I think) at the RAF Museum Hendon would need to be consulted to ascertain whether it was a surface crash only or whether there are likely to be buried remains including possible human remains. It is likely to be a major constraint if there are buried remains as a licence for recovery (with conditions) would be needed under the Protection of Military Remains Act 1986 and geophysics may be needed to locate sub-surface remains.

With regard to the hedgerows they would need to be assessed under the Hedgerow Regulations Act 1997 schedule II criteria to see if they are deemed to be "important" under those criteria - see

<https://www.legislation.gov.uk/ukxi/1997/1160/contents/made> Some of the southern and western boundaries appear coincide with parish boundaries and may therefore be important.

A Heritage Impact Assessment and resulting Heritage Impact Statement should be completed in accordance with the Cadw Best Practice Guidance <https://cadw.gov.wales/advice-support/placemaking/heritage-impact-assessment/heritage-impact-assessment> to address potential setting impacts on the nearby listed buildings. The Cadw Conservation Principles should also be taken into account here <https://cadw.gov.wales/advice-support/conservation-principles/conservation-principles>

The ridge and furrow seems quite poorly preserved here on the lidar (although no coverage to the east) so we would probably not have any issues with that.

There should be a walkover survey as well as a desk-based survey to identify any previously unrecorded sites in these fields via a systematic transect search of the area with mapping and detailed description of any features found.

The sub-surface potential of the site prior to the post-medieval period will remain largely unknown through a conventional desktop and walkover survey, so we normally recommend a geophysical survey also using magnetometry, or any other appropriate technique as advised by a geophysical specialist. A typical brief for a magnetometry survey is attached.

In terms of assessment and reporting we normally require a method statement or *written scheme of investigation* (WSI) document to be sent to us for approval before fieldwork commences. The WSI should include a Data Management Policy and archive Selection Strategy in line with the new CIFA guidance (see attached document). The survey, reporting and archiving should adhere to the appropriate CIFA standards and guidance. A high- res copy of the resulting pdf report would need to be sent to the HER via Dr Gary Duckers gary.duckers@cpat.org.uk or uploaded direct via <https://cpat.org.uk/heddos.html> The full digital archive would need to be sent to the National Monuments Record, RCAHMW, National Library of Wales, Aberystwyth. Any reports submitted need to meet the requirements of the Welsh HER Submission Guidelines (see attached document).

I hope all of the above helps with regard to taking this project forward and assessing it appropriately.

Kind regards

Mark Walters

Mark Walters
Development Control Archaeologist / Swyddog Rheoli Datblygiad

Ffôn / Tel: 01938 553670/552035 Mobile: 07736 163148

E-bost / E-mail: mark.walters@cpat.org.uk

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Swyddfa Gofrestredig fel yr uchod. Rhif Cwmni 1212455, Rhif Elusen 508301, Sefydliad Cofrestredig ClfA.

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Registered Office as above. Company No 1212455, Charity No 508301. Chartered Institute for Archaeologists
Registered Organisation No 6.

Please note that I do not work Fridays

From: Amir Bassir <AmirBassir@tep.uk.com>
Sent: 17 December 2021 14:37
To: Mark Walters <mark.walters@cpat.org.uk>
Subject: Land at Bryn Lane, Wrexham

Dear Mark,

TEP have been instructed to undertake a heritage assessment of a site located between Francis Lane and Bryn Lane, Wrexham (centred on approximately SJ 38248 51050) in support of an outline application for development of the site. The site comprises the local planning authorities' draft employment allocation KSS3 for delivery of employment land.

I will be reviewing a study area of known heritage assets comprising a 1km radius of the site and will be submitting an HER search request and carrying out a site visit.

A preliminary review of the baseline reveals very few designated heritage assets in the vicinity, primarily the Grade II listed New Holt Lodge Farm. A single aircraft crash site is recorded within the site bounds with others in the vicinity of the site due to the nearby former Borrass Airfield. The site includes a number of hedgerows present on first edition Ordnance Survey mapping and these are likely to be affected by development. Ridge and furrow is recorded in many fields in the surrounding area however relatively few archaeological remains and events are recorded in the locality in the Archwilio database.

I wanted to take the opportunity to consult with you and get your thoughts on any potential heritage constraints or opportunities that you think should be accounted for in the heritage assessment.

Do feel free to call my mobile to discuss,

Kind regards,

Amir Bassir (BSc (Hons) PG Cert MClfA)
Senior Historic Environment Consultant

01858 383118 (Direct Dial)
07341 563780 (Mobile)



Warrington | Gateshead | **Market Harborough** | London | Cornwall
01925 844004 | 0191 605 3340 | 01858 383120 | 0203 096 6050 | 01326 240081

Amir Bassir

From: Clarkson, Helen @ Manchester <Helen.Clarkson@cbre.com>
Sent: 02 December 2022 09:59
To: mark.walters@cpat.org.uk
Cc: Matthew Phillips; Raby-Smith, Rebecca @ London SMC; Grady, Sarah @ Manchester; Amir Bassir; Little, Patrick @ London SMC
Subject: Land north of Bryn Lane - Geophysical Report
Attachments: Bryn Lane Wrexham Geophysical Survey Report.pdf

Categories: Saved to TEPSP13
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SharePointAbsoluteFileUrl: http://tepsharepoint2013/sites/TEP1/9134.02/Emails/Land north of Bryn Lane - Geophysical Report_lxhov4.msg

Hi Mark,

Please find attached geo-physical report for land north of Bryn Lane, as requested. Please let us know if you have any questions regarding the attached.

Kind Regards,
Helen

Helen Clarkson | Associate Director

CBRE Limited | Planning & Development
10th Floor, One St Peters Square, Manchester, M2 3DE
DDI 0161 233 5418 | T 0161 455 7666 | Internal Extension 35418 | M 07766 421 089
helen.clarkson@cbre.com | <http://www.cbre.com>

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From: [Mark Walters](#)
To: [Amir Bassir](#)
Subject: Re: Land at Bryn Lane, Wrexham - Archaeological Assessment
CIFA Standard & Guidance Update - Selection Strategy & Data
Attachments: [Management Plan June 2020.pdf](#); [Guidance for the Submission of Data to Welsh HERs V1 \(EN\).pdf](#); [Geophysics Brief.docx](#);
Sent: 04/01/2022 15:13:56

Dear Amir

Thank you for the early consultation on this development proposal area.

As the scheme develops it would be useful to have a red boundary plan showing the extent and any early indicative layout so that we can comment further. From the grid ref. alone it is quite difficult to provide targeted advice.

We would agree with what you have currently identified in terms of constraints in these fields. In terms of the aircraft crash site more work would need to be done on accurately locating this site which is likely to be inaccurate on the HER. The RAF air crash records held (I think) at the RAF Museum Hendon would need to be consulted to ascertain whether it was a surface crash only or whether there are likely to be buried remains including possible human remains. It is likely to be a major constraint if there are buried remains as a licence for recovery (with conditions) would be needed under the Protection of Military Remains Act 1986 and geophysics may be needed to locate sub-surface remains.

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Kind regards

Mark Walters

Mark Walters
Development Control Archaeologist / Swyddog Rheoli Datblygiad

Ffôn / Tel: 01938 553670/552035 Mobile: 07736 163148

E-bost / E-mail: mark.walters@cpat.org.uk

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Swyddfa Gofrestredig fel yr uchod. Rhif Cwmni 1212455, Rhif Elusen 508301, Sefydliad
Cofrestredig CIfA.

Clwyd-Powys Archaeological Trust, The Offices, Coed y Dinas, Welshpool, SY21 8RP.
Registered Office as above. Company No 1212455, Charity No 508301. Chartered Institute for
Archaeologists Registered Organisation No 6.

Please note that I do not work Fridays

From: Amir Bassir <AmirBassir@tep.uk.com>

Sent: 17 December 2021 14:37

To: Mark Walters <mark.walters@cpat.org.uk>

Subject: Land at Bryn Lane, Wrexham

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Do feel free to call my mobile to discuss,

Kind regards,

Amir Bassir (BSc (Hons) PG Cert MCIfA)

Senior Historic Environment Consultant

01858 383118 (Direct Dial)

07341 563780 (Mobile)



Warrington		Gateshead		Market Harborough		London		Cornwall
01925 844004		0191 605 3340		01858 383120		0203 096 6050		01326 240081



From everyone at TEP have a very Merry Christmas and a Happy New Year!

Our offices will be closed from 12.30pm on the 23rd December and open again on the 4th January 2022.

[>Click here for your Christmas card](#)

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From: [Amir Bassir](#)
To: 'mark.walters@cpat.org.uk'
Subject: Land at Bryn Lane, Wrexham
Sent: 17/12/2021 14:37:39

Dear Mark,

TEP have been instructed to undertake a heritage assessment of a site located between Francis Lane and Bryn Lane, Wrexham (centred on approximately SJ 38248 51050) in support of an outline application for development of the site. The site comprises the local planning authorities' draft employment allocation KSS3 for delivery of employment land.

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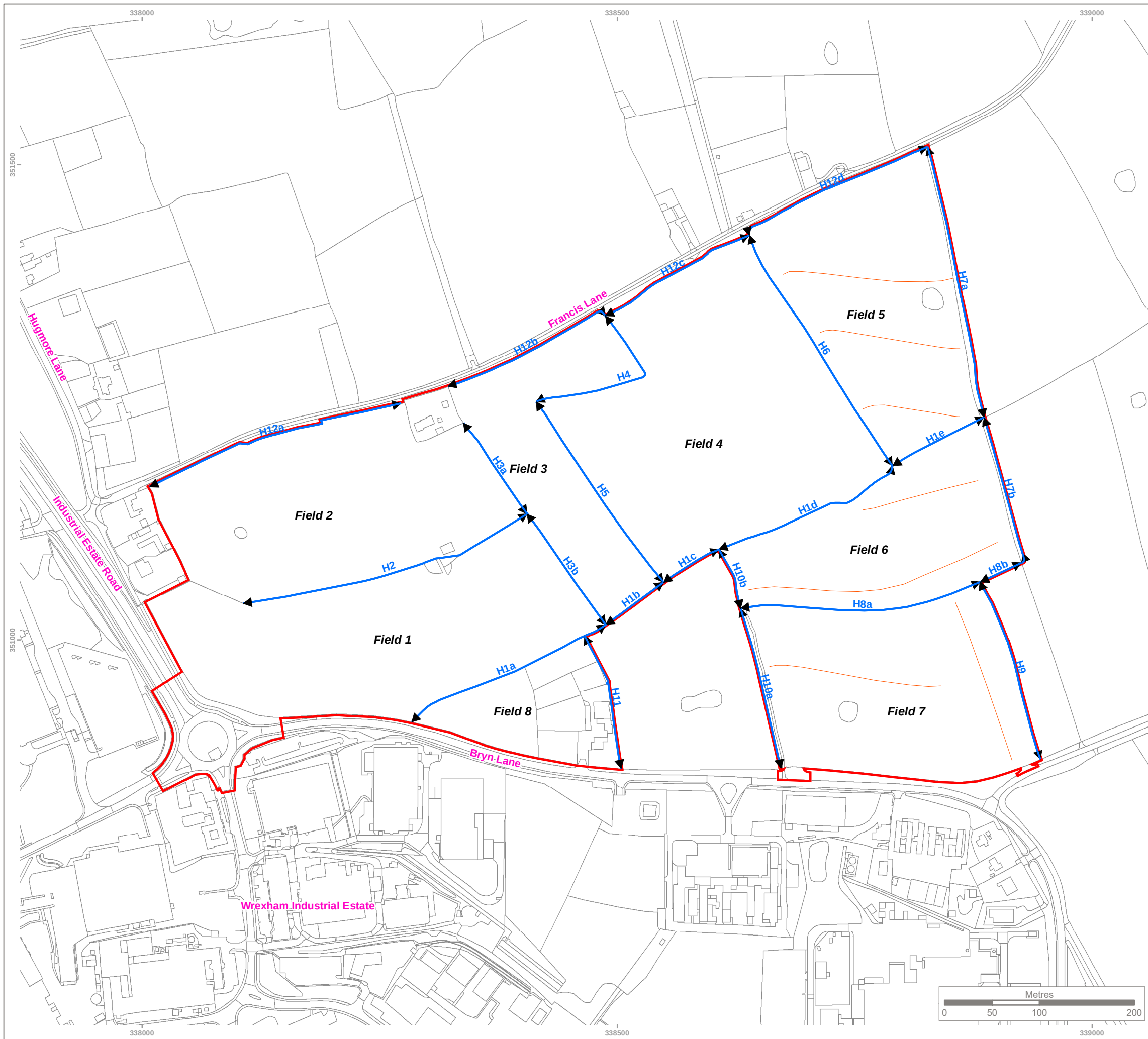
I wanted to take the opportunity to consult with you and get your thoughts on any potential heritage constraints or opportunities that you think should be accounted for in the heritage assessment.

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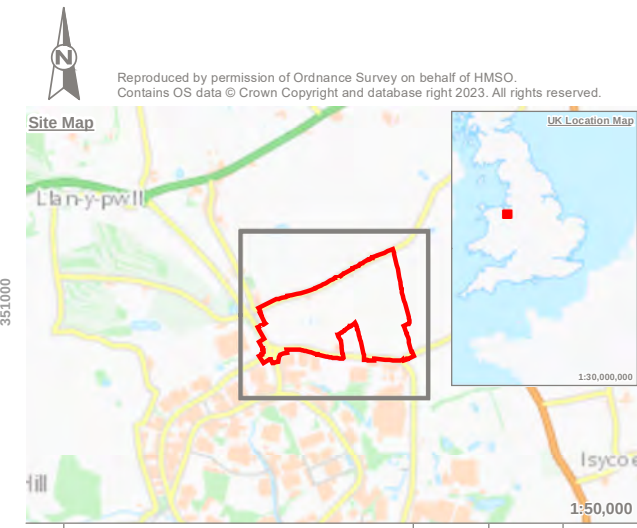
Kind regards,

Amir Bassir (BSc (Hons) PG Cert MCIfA)
Senior Historic Environment Consultant
01858 383118 (Direct Dial)
07341 563780 (Mobile)

9.0 Appendix - Drawings



- KEY**
- Site boundary
 - Historic hedgerows
 - Location of former hedgerows
 - Ridge and furrow direction



Rev	Description	Drawn	Approved	Date

THE ENVIRONMENT PARTNERSHIP

The Reynard Suite - First Floor Offices,
Bowden Inn Farm, Market Harborough, LE16 7SA
Tel 01858 353120 e-mail tep@tep.uk.com www.tep.uk.com

Project
Land North of Bryn Lane

Title
G9134.02.007

Drawing Number
Important Hedgerows

Drawn	Checked	Approved	Scale	Date
AB	SW	JC	1:4,000 @ A3	27/04/2023

APPENDIX 2 – MASTERPLAN: FIELDS 5 & 6 OVERLAY



Proposed Illustrative Site Masterplan with Field Overlay
1 : 1250



SGP

Architects + Masterplanners

Waterfront House
2a Smith Way
Grove Park
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www.stephengeorge.co.uk

Wrexham
Bryn Lane

Drawing Name:
Masterplan - Fields 5 & 6 Overlay

Drawing Stage: **FEASIBILITY**

Status: **S2**

SGP File Ref: 22136-SGP-ZZ-ZZ-M3-A-000001

22-136 24/10/2023 JMS WMS 1:1250 @ A0

SGP Project No. Date Drawn Team Scale Rev

Drawing Number:

22136-SGP-ZZ-ZZ-DR-A-11022

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