



PLANNING STATEMENT

Prepared in support to a Hybrid Planning Application for a New Business Park at the
Bridgeway Centre, Wrexham Industrial Estate

On behalf of FI Real Estate Management Ltd

JANUARY 2022

DOCUMENT REFERENCE: FI003_02 VER5



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1 EXECUTIVE SUMMARY

- 1.1 FI Real Estate Management (“FIREM”) is applying for planning permission to redevelop the existing Bridgeway Centre in Wrexham Industrial Estate. The proposed development will create a new contemporary styled employment / business park comprising a number of blocks split into smaller units, designed for occupation by a wide range of businesses and enterprises across Use Classes B1, B2 and B8. A total of 52 new units ranging will be provided across Blocks C to J in the proposals. Existing retail, service, food and drink units within Block B fronting Coed Aben Road will be retained / refurbished as part of the proposals.
- 1.2 Combined employment floorspace shall be up to 10,307 sqm in Class B1, B2 and B8 uses across Blocks C to J; net increase in floorspace is 6,300 sqm. Block B will be retained and refurbished in retail, food and drink uses with a combined floorspace of 674 sqm.
- 1.3 Access will be retained off Bridge Road (two) and Coed Aben Road (one). Blocks B to E will be separately accessed to Blocks F to J with the latter served off an improved, dedicated Bridge Road access. Associated changes will be made to internal circulation, parking and servicing including provision for accessible spaces and EV charging.
- 1.4 New landscaping, sustainable urban drainage, ecology mitigation measures and ancillary works complete the development picture.
- 1.5 A proposal for an additional unit as Block A off Coed Aben Road shown in pre-application consultation has been dropped and does not form part of these proposals. A future decision will be made on this issue.
- 1.6 The application site has the status of previously developed land and like the wider industrial estate is in use for industry with exception of the small parade of shops / services in Block B. Many of the existing buildings date from the 1940s and are outdated, and comprehensive redevelopment is required to provide a range of new, modern industrial units to meet the needs of current and prospective industrial occupiers.
- 1.7 The application site’s location and profile are not only eminently suitable for industrial and employment uses generally but it is particularly suited for multi-unit developments as proposed. FIREM has considerable experience of this type of development including at

Wrexham Industrial Estate where it owns and operates a number of other sites of this nature.

- 1.8 A hybrid planning application has been made with the area and units in Blocks B to E in detail and Blocks F to J in outline (all matters reserved except means of access). This will facilitate FIREM's intention to develop the proposal in phases to allow existing tenants to relocate either within the development or other units elsewhere in Wrexham Industrial Estate which are also within the control of the applicant. This means there will be no disruption to existing business and existing employment enterprises can be retained. By applying for Units F to J in outline this also provides a modicum of flexibility to tailor units to individual needs as part of this phased delivery process.
- 1.9 The net increase in floorspace, number and range of employment units than present means existing economic activity will be maintained and additional employment opportunities will be created, with attendant potential to support more jobs and grow the local economy. Units will be available on a range of flexible leases and related arrangements to encourage new enterprises and to support the growth and expansion of existing businesses.
- 1.10 It is considered the proposed development will be a tremendous asset to Wrexham Industrial Estate, Wrexham generally and will considerably add to the assets of this nationally important centre for employment.
- 1.11 In planning policy terms the site is located within the defined area of Wrexham Industrial Estate. The site can be regarded as appropriate for the form and profile of development proposed under the planning application. Surrounding the site is a mix of industrial and employment developments and also a large prison. Further to the southwest, separated and well screened from the site, is a small residential area. Accordingly, in land use terms the site's context is developed and mainly industrial and commercial in profile and is typical of estates of this ilk.
- 1.12 The site is allocated for industrial / business use in the adopted development plan, *Wrexham Unitary Development Plan*. This is also the case in the emerging, though delayed, *Wrexham Local Development Plan* which is expected to be adopted in early 2022 – potentially before this application is determined. The proposed development is compliant in principle to the land use designation of the application site in both the adopted and emerging development plans for the area. The planning application also accords with national planning policy in *Planning Policy Wales* and related *Technical Advice Notes* as set out later in this Statement.



- 1.13 In addition, the planning application can be regarded as acceptable by reference to usual planning, site related and land use considerations, including its impacts and effects on the local road network (transportation considerations), bio-diversity and ecology (bats and great crested newts), amenity of existing uses including residential (noise), ground conditions, flood risk and by reference to related planning policies of the adopted and emerging development plans.
- 1.14 Overall, the planning application for the proposed development can be regarded as acceptable in planning terms including by reference to usual planning policy and general planning and land use considerations. It will also deliver a considerable range of economic benefits to be given due weight in the consideration of the planning application. Accordingly, the planning application can and should be granted.

2 INTRODUCTION

- 2.1 This planning statement (“statement”) has been prepared by Plan Red on behalf of FI Real Estate Management Ltd (“FIREM / applicant”) in support of its hybrid planning application to Wrexham Council (“council”) for detailed and outline planning permission for new employment development, circulation, revised access arrangements, ecology mitigation and ancillary development (“proposed development”) at the Bridgeway Centre off Bridge Road at Wrexham Industrial Estate, Wrexham, LL13 9QS (“application site”).
- 2.2 When the planning application proposals were still evolving they were presented to the council for consideration through its pre- application service. This was in late 2020. Formal advice, including from council and usual consultees, was provided in written form by the council in April 2021. The applicants have had regard to this when finalising the layout and design of the proposed development. This topic is considered further in section 4 of the statement.
- 2.3 In addition, the profile of the development meant the applicants had to pay regard to the statutory requirement to carry out formal pre-application consultation (“PAC”) on the emerging development proposals. The duty for this is imposed by section 61Z of the *Town and Country Planning Act 1990*. Further provision is contained in Part 1A of the *Town and Country Planning (Development Management Procedure) (Wales) Order 2012* (“Order”). Guidance is also provided by the Welsh Government in the ‘New Development Management Procedures’ letter issued in February 2016. PAC was required because the proposed development falls within the category of ‘major development’ as set out in the Order. The approach followed to carry out PAC and related responses is also covered in section 4 of the statement and in more detail in the Neighbour Community Consultation Statement by Plan Red submitted in support of the application.
- 2.4 The statement is to be read in conjunction with documents that deal with design, other planning and land use related topics submitted in support of the planning application and as detailed in the separate Application Checklist and Drawing Pack.
- 2.5 The scope of the statement is as follows:
- Section 3 sets out background on the applicants and the impetus for the planning application.



- Section 4 sets out feedback provided through the council's pre-application process and subsequently through the PAC process.
- Section 5 describes the application site and its vicinity.
- Section 6 describes the proposed development.
- Section 7 sets out the planning framework applying to the application site.
- Section 8 summarises information set out in the FIREM and Plan Red employment land report.
- Section 9 sets out our assessment of the proposed development and the case in support of the planning application.
- Section 10 sets out conclusions on the matters addressed by the statement.

3 BACKGROUND ON PLANNING APPLICATION

About the Applicant

- 3.1 FIREM was established 40 years ago. It provides workspace, asset and property management services. It is also an experienced developer and this is becoming an increasingly important activity. Most of its employment related schemes once developed and completed are then added to its diverse investment portfolio, which includes industrial, office, retail and residential premises. It has recently created its own construction arm, FI Construction, to develop out its schemes.
- 3.2 FIREM's main guiding principle is that every property related intervention and action creates the opportunity to create better quality floorspace and buildings and generate value. Its property development arm was established to focus on creating places of quality and distinction, that offer opportunity and through an approach defined by a commitment to excellence.
- 3.3 Its team specialises in large-scale single use or mixed-use developments, using their planning experience to bring together a strong supply chain of consultants and contractors to deliver projects of every type and size.
- 3.4 As a responsible developer, FIREM works closely with local authorities, its partners and communities to ensure a cohesive and quality approach is taken to all of its projects.
- 3.5 FIREM currently asset and property manage many hundreds of thousands of square metres of industrial and commercial property and floorspace and is adding to this monthly through new developments and acquisitions.

Reason for Current Proposals

- 3.6 A key objective of the current and emerging development plan for the site, *Wrexham Local Development Plan* ("WLDP"), covered in detail in Section 7, is to support a vibrant, diverse and competitive local economy and one that provides a range of job opportunities to enable new and existing businesses to grow and develop in Wrexham. Accordingly, it is imperative that the council and owners and suppliers of industrial and employment land and premises for leasing, including FIREM, provide the Borough with an adequate supply of high quality serviced land and premises to accommodate projected growth and demand from would be

tenants, while allowing choice and flexibility to meet the varying nature of future employment needs and demands.

- 3.7 This is also stressed through emerging local planning policy, *Wrexham Local Development Plan*, and its related evidence base. Indeed, the council's *Economic Prosperity Strategy* (2012-2017) emphasises and recognises the need for the council and related partners, which we would say includes the likes of FIREM, to intervene to guide the direction and development of the local economy. The Strategy also confirms the council's commitment to securing an adequate supply, and in the correct locations, of the right land and buildings to attract high quality employment uses and opportunities and in the most sustainable and accessible locations. The Strategy does acknowledge that it will not just be the Council that will provide the right land and buildings etc. hence the relevance of this to organisations like FIREM that specialise in providing high quality employment units / floorspace for leasing.
- 3.8 Accordingly, developments like that currently being promoted by FIREM are needed for many reasons, including need to accommodate the jobs growth estimate; need for flexibility in provision of employment floorspace; need for competition to drive quality and choice; and need for a range of available sites and premises suitable for different employment uses and businesses in varying locations throughout the Borough. Ideally, developments of this ilk should be located in sustainable locations like Wrexham Industrial Estate ("WIE").
- 3.9 As has already been confirmed, the existing units / floorspace at the site were built many years ago, during the second world war, and when development took place the units were designed and required to serve very different needs and purposes to those they are currently being put to. The age, condition and general limitations of the existing floorspace impact significantly on commercial interest in them when occupiers leave and leases are up for reassignment. The units offer limited scope for use. And in terms of quality they provide poor quality, outdated, far from fit for purpose employment floorspace. This has impacted on interest in the units, actual take up and resultant rentals achieved.
- 3.10 A point acknowledged in the Strategy and experienced by FIREM is that there is a recognised and continued strong demand for land and premises in the area including at WIE – approximately 80% of the employment land take up in the Borough since 2006 has been on land within WIE. Existing and emerging planning policy in Wrexham UDP and LDP respectively, including WLDP Policy EMP1, support the protection and making best use of land already allocated for and in use for employment purposes.



- 3.11 As traditional employment uses tend to generate lower land values than most other uses, for e.g., housing and retail (certainly in recent past), there can be pressure for employment land to be lost to these uses, which can be difficult to replace. While some existing sites which may not have a reasonable prospect of being used for economic development can be de-allocated, planning policy seeks to safeguard existing and identified future employment sites for employment use. FIREM is conscious of this point, and this is one of the drivers for it wanting to redevelop the existing units / floorspace at the site. This will not only keep the site in employment use but it will be in a form that makes it attractive to occupiers, makes it flexible in terms of future / ongoing use and makes it viable from FIREM's perspective.

4 PRE-APP ADVICE AND FEEDBACK THROUGH PAC PROCESS

- 4.1 Following an application by JFP on behalf of FIREM in late 2020, pre-application advice on the proposed development was provided by the Council in April 2021. Key advice is as set out below:

Development Plan policies/local planning guidance:

Wrexham Unitary Development Plan adopted 14/2/2005.

The site lies within settlement limits for Wrexham Industrial estate.

Relevant Policies:

- *PS1 Settlement limits*
- *PS2 Environmental Impacts*
- *PS11 Biodiversity GDP1 Development Principles*
- *T8 Parking*
- *S4 Large-scale retail development*
- *EC4 Trees EC6 Biodiversity*
- *EC13 Surface water run-off*
- *E4 Employment development within settlement limits*

Relevant Local Planning Guidance Notes

- *15 Cycling*
- *16 Parking standards*
- *17 Trees and development*
- *23 Contamination*
- *26 Landscaping and employment development*
- *29 Biodiversity and employment*
- *32 Biodiversity*

The Wrexham Local Development Plan was subject to examination commencing Autumn 2019 and is likely to proceed to adoption in 2021.

Please also refer to Welsh Assembly Government's Planning Policy Wales (PPW11) Edition 11, and all relevant Technical Advice Notes.

Community Council contact details:

Community Council: Abenbury

Relevant Planning History:

The following reference numbers have been found, and details can be provided if required:

- *P/2004/0900*
- *P/2000/0460*
- *P/2000/0594*
- *P/2004/1335 CB01459*
- *P/2012/0557*
- *P/2019/0248*
- *P/2019/0247*

Constraints (within or close to the site):

- *Low risk Coal Consultation area*

Infrastructure contribution requirements and suggested 'Heads of Terms' for legal obligations:

- *Not applicable*

Validation requirements:

Validation information for planning applications and fees are set by the Planning Portal.

https://www.planningportal.co.uk/wales_en/.

This proposal would require additional information as follows:

- *Landscape scheme*
- *Drainage scheme*
- *Tree report*
- *Archaeology report*
- *Ecology report*

Views of officer:

Principle of the development:

The site is within settlement limits and employment development would comply with broad planning policies which seek to confine development to existing settlements with a good range of

services. The provision of a drive-through restaurant could be seen as competing with town centre uses and would require special justification to show that it is in accordance with planning policy including TAN4 and PPW11.

Design and layout:

The development would result in the loss of open land fronting Bridge Road and Coed Aben Road and would be contrary to the guidance set out in LPGN26. This is of value for amenity and ecological reasons.

Trees:

The proposal may affect trees on the south-east and east sides and a tree report would be required.

Ecology:

The comments from Natural Resources Wales are attached. Comments from the council's ecology officer will be forwarded.

Archaeology:

The comments of the Clwyd-Powys Archaeological Trust are attached.

Highway safety:

Comments have been requested from the highway authority and will be forwarded.

Contamination:

Comments from the Council's Contaminated land officer are attached.

Drainage:

Comments from the Council's drainage officer, NRW and Welsh Water are attached. Advice on Sustainable drainage is available from our website:

[tps://www.wrexham.gov.uk/english/planning_portal/sab/sab.htm](https://www.wrexham.gov.uk/english/planning_portal/sab/sab.htm) or by contacting the SAB Team directly at SAB@wrexham.gov.uk.

Building Regulations:

Your scheme will require Building Regulation approval.



Conclusion:

The principle of an employment development is acceptable subject to the issues set out above and outstanding consultation replies, but there are concerns with the proposed A3 use and the loss of open land adjoining the road. These comments are made without prejudice to any formal decisions of the Local Planning Authority.

- 4.2 It should be noted that the proposed A3 use referred to above, which would have been contained in new Block A, has been dropped and is not covered through this planning application.

5 PLANNING APPLICATION SITE

Address and Location

- 5.1 The Bridgeway Centre's address is Bridgeway Centre, Bridge Road, Wrexham Industrial Estate, Wrexham, LL13 9QS. The broad location of the site is as shown in Figure 1. The extent of the site, i.e., red and blue line boundary is as shown on the plan at Figure 2 (paragraph 6.7).

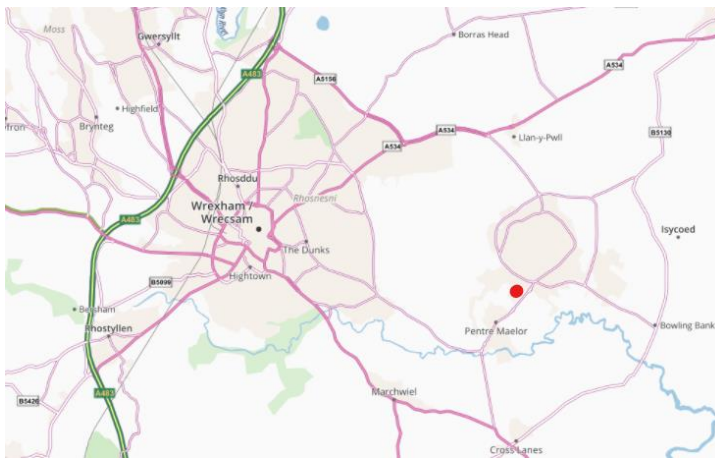


Figure 1: WIE and Bridgeway Centre Broad Location

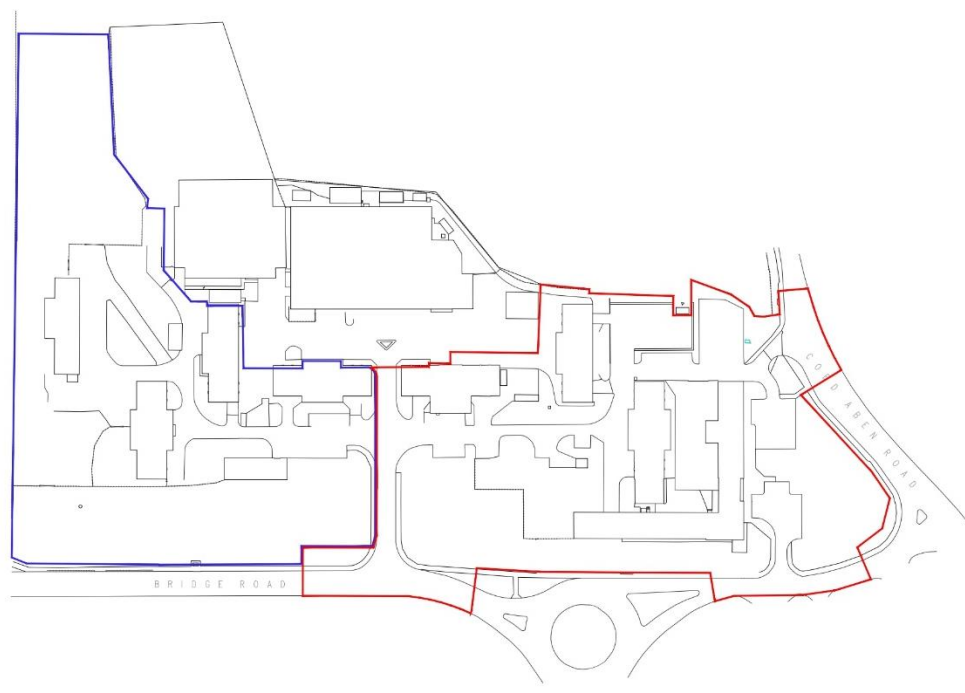


Figure 2: Site Location Plan (dwg. 1182-02-001 Rev P04)

Size and Floorspace

- 5.2 The application site extends to approximately 3.4 ha. It currently accommodates some 8 blocks of development (Blocks C – J) used for employment purposes, a combined provision of 4,007 sqm GIA floorspace. Block B is used for retail and service businesses with a combined 674 sqm GIA floorspace.

Context

- 5.3 The site is located roughly south west of the heart of WIE some 4 km (2.5 miles) from the town centre of Wrexham.
- 5.4 WIE was developed during World War II as munitions factory. Post the ending of the war the estate was transformed from a military site to a peacetime facility for industrial and employment uses. At that point in time businesses initially used the site's stock of existing buildings. But soon after and continuing ever since many were redeveloped so as to facilitate the delivery of more modern industrial and commercial floorspace.
- 5.5 WIE has now grown to cover approximately 550 hectares (1,359 acres) and is the largest industrial estate in Wales, second in the UK after Trafford Park, and one of the largest industrial estates in Europe. It supports around 300 businesses, providing employment for approximately 8,000 people. The estate consists of standalone industrial sites, industrial estates and business parks.
- 5.6 In addition, the estate is the location of the UK's largest prison, HM Prison Berwyn. This opened in 2017 and is directly to the south east of the site.

Site Profile

- 5.7 The site is currently partly developed by a group of now dated, poor quality, mismatched, single storey in height industrial units with surface car parking set in a loose layout of landscaped grounds.
- 5.8 Currently the site comprises:
- 8 blocks for employment use (Blocks C – J) – combined floorspace 4,007 sqm GIA.
 - 1 block for retail use (Block B) – 674 sqm GIA.
- 5.9 The photographs that follow (© Google Street Views) illustrate the existing buildings on site:



Photograph 1: Main vehicular access into the site off Bridge Road



Photograph 2: Site looking west from main access road into the site



Photograph 3: View from looking east from wester area of site



Photograph 4: View looking west from eastern area of site



Photograph 5: Bridgeway Centre viewed from Coed Aben Road

- 5.10 The Design and Access Statement, prepared by MCAU contains further images of the existing development.

Topography

- 5.11 The site sits at 30m AOD and like most of the other areas of the industrial estate can be regarded as being mainly flat.

Existing uses on site and surrounding

- 5.12 In terms of existing uses/operations on site, the existing units / floorspace are in industrial use (Use Classes B1, B2 or B8). The Bridgeway Centre itself, which is Block B, is in retail and services use (mainly Class A1).
- 5.13 The site is bounded by Bridge Road (south east) and Coed Aben Road(north west). There are other industrial properties to the south west and beyond them is a small well defined area of residential. Generally, to the north, east and south east are other areas of industry. Directly to the south is HMP Berwyn and related infrastructure.

Drainage and Flood Risk

- 5.14 Reference to the Natural Resources Wales Flood Risk Map confirms that the site in its entirety is located in Flood Zone 1. This zoning means that the site can be regarded as being at low risk of flooding and suitable for development.

Access

- 5.15 In terms of its accessibility profile, the site is well-located vis a vis its relationship to the road network and public transport services that serve the industrial estate and it is served



by three separate accesses (two off Bridge Road and one off Coed Aben Road). Further details are covered in the Transport Report by Prime.

6 PROPOSED DEVELOPMENT

- 6.1 Specifics of the layout and design of the proposed development are depicted through the pack of application drawings and are also described in detail in the Design and Access Statement (“DAS”) prepared by MCAU.

Overview

- 6.2 The proposed scheme is for the redevelopment of all but one of the site’s existing blocks of units to provide for 8 new blocks of development subdivided into smaller units all for employment uses. The application is divided into detailed and outline elements as a hybrid planning application. The proposed description of development is:

Hybrid Planning Application for (A) Detailed Permission to demolish and erect 33 units for commercial / industrial uses (Use Classes B1, B2 and B8) (Blocks C, D and E, combined floorspace 3,411 sqm) and retention and refurbishment of retail / food & drink units (Use Classes A1, A2 and A3) (Block B, combined floorspace 674 sqm), with associated internal access, servicing, landscaping, infrastructure and ancillary works; and (B) Outline Permission (all matters reserved except access) to demolish and erect up to 19 units for commercial / industrial uses (Use Classes B1, B2 and B8) (Blocks F to J, combined floorspace up to 6,896 sqm), with associated internal access, servicing, landscaping, infrastructure and ancillary works

Detailed application

- 6.3 Detailed permission is sought for demolition and erection of 33 units (Blocks C to E) for a combined floorspace of 3,411 sqm, providing a range of different sized units for employment uses defined as uses falling within Use Classes B1, B2 and B8. The Area Schedule (ref 1182-1101-001) provides a breakdown by unit.
- 6.4 The proposals include a modified access off Bridge Road (improved), new circulation roads, dedicated commercial / HGV servicing and car parking along with landscaping and other infrastructure and ancillary works.
- 6.5 The detailed application also encompasses Block B (existing retail units) which shall be retained and refurbished. As part of the demolition works the arm of the existing L-shaped building parallel to Bridge Road will be removed and the elevation made good. A future

application is intended for the full renovation / façade of Block as illustrated in the Design and Access Statement.

Outline application

- 6.6 Outline permission (all matters reserved except means of access) is sought for demolition and erection of up to 19 units, new Blocks F to J with a combined floorspace up to 6,896 sqm providing for a range of different sized units for employment uses defined as uses falling within Use Classes B1, B2 and B8.
- 6.7 Future reserved matter consent will be sought for the design and appearance of each unit and layout and landscaping for new circulation roads, commercial / HGV servicing and car parking along with other infrastructure and ancillary works. The DAS and accompanying drawings illustrate the intended details as illustration and information to inform determination of the application in principle.
- 6.8 We would anticipate a planning condition to be used to require reserved matters to be brought forward in broad conformity to the proposed layout.

Matters excluded from the detailed application

- 6.9 To clarify the earlier point Block B is being retained in situ and to continue in use for retail and food/drink uses, only the elevation where the building is partly demolished will be required to make good which can be controlled through condition with other works being internal refurbishment. A separate, future application will be made for the full external renewal of the building / units as illustrated in the DAS.
- 6.10 In pre-application an earlier proposal was made for a further unit, Block A, for a food and drink / A3 use situated to the front of Block B. However, this has been dropped from the proposal at this time and does not feature in this planning application. The area remains within the red line of the detailed element of the application but now retained as a landscaped area.

Proposed Layout

- 6.11 The proposed layout of the new development is shown in Figure 3. More detail is available in the DAS and other drawings prepared by architects, MCAU.



Figure 3: Proposed layout (dwg. 1182 02-002 P15)

Proposed development

6.12 In a little more detail and combining the detailed and outline as whole scheme proposal the main elements comprise:

- Delivery of development on an area of up to 3.4 ha
- Delivery of 8 new blocks containing up to 52 units (Blocks C to J) for employment uses with a combined floorspace of 10,300 sqm (6,300 sqm net additional)
- Retention and refurbishment of retail, food & drink units within Block B (combined 674 sqm floorspace)
- Improved main access off Bridge Road to serve Blocks F to J with new internal layout and circulation road network including HGV turning
- Separate accesses retained off Coed Aben Road and Bridge Road to serve Blocks B to E with new internal circulation road network serving these blocks
- Pedestrian route network through site allowing all blocks to be accessed
- Dedicated small yard area for each unit within Blocks C to J

- Up to 228 car parking spaces serving Blocks B to J, including 24 accessible spaces and 6 EV charging spaces
- Two cycle stores for up to 44 bicycles
- Landscaping
- New SUDS drainage
- Ancillary infrastructure, utilities and services

Blocks/Units Floorspace Details

- 6.13 Total employment floorspace (Use Classes B1, B2 and B8) is up to 10,300 sqm GIA. The net change in employment floorspace is +6,300 sqm GIA. All existing provision will be demolished with exception of Block B retained for retail, food & drink uses (674 sqm combined floorspace).
- 6.14 Present unit / floorspace configuration provides 22 commercial units in B1, B2 or B8 use. Proposed configuration will provide up to 52 units in a range of unit sizes set out in submitted plans. Overview by block the employment provision applied for in detail is as follows:
- Block C – New floorspace - Employment – 13 Units – 1,525 sq m (16,419 sq ft)
 - Block D – New floorspace - Employment – 7 Units – 694 sq m (7,470 sq ft)
 - Block E – New floorspace - Employment – 13 Units – 1,192 sq m (12,835 sq ft)
- 6.15 The following units comprise the outline element:
- Block F – New floorspace - Employment – 7 Units – 3,042 sq m (32,739 sq ft)
 - Block G – New floorspace - Employment – 4 Units – 540 sq m (5,813 sq ft)
 - Block H – New floorspace - Employment – 2 Units – 808 sq m (8,698 sq ft)
 - Block I – New floorspace - Employment – 5 Units – 1,726 sq m (18,577 sq ft)
 - Block J – New floorspace - Employment – 1 Unit – 780 sq m (88,396 sq ft)

Design

- 6.16 The design of the proposed units will be contemporary in design and style and use of materials. Full details of the details of the development, including dimensions, are set out and confirmed through the drawings pack and also the DAS.

- 6.17 Figure 4 provides an illustrative CGI of the development, prepared by MCAU, of the overall style, appearance and general visual qualities of the proposed development. These details apply to Blocks C to J.



Figure 4: Illustration of overall style and appearance (Blocks C to J)

7 PLANNING FRAMEWORK

Background

- 7.1 The *Planning (Wales) Act 2015*, the *Well-being of Future Generations (Wales) Act 2015* and other key legislation and resultant duties such as the Socio-economic Duty confirm that a well-functioning planning system is fundamental for sustainable development and achieving sustainable places.
- 7.2 Up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making. Planning applications must be determined in accordance with the adopted plan unless material considerations indicate otherwise.
- 7.3 Material considerations can cover anything to do with the purposes of planning and include all typical planning, development, land use and related factors that have a bearing on whether a planning application should be granted.
- 7.4 It should be noted that national planning policy for Wales has the status of a material consideration in planning decisions, although it can be given greater weight where there is the absence of a comprehensive or fully up to date development plan.

Presenting Policy

- 7.5 Although the decision-making framework places great emphasis on the development plan in development management decisions we present relevant planning policy in a top down approach, i.e., national planning policy first followed by development plan policy. This is because development plans take their lead from national planning policy.

National Planning Policy

Planning Policy Wales, 11th Edition 2021

- 7.6 *Planning Policy Wales*, 11th Edition published in February 2021, (“PPW1111”), 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.
- 7.7 At paragraph 1.2 PPW11 confirms that its primary objective 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. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places.

- 7.8 At paragraph 1.11 PPW11 deals with the well-being of Future Generations, which is a fundamental aim of policy. The *Well-being of Future Generations (Wales) Act*, 2015 places a duty on public bodies to carry out sustainable development. This is not a new concept for the planning system as the principles of sustainable development have been at the heart of planning policy since PPW11 was first published in 2002. However, the concept has been expanded under the *Well-being Act* and it requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural.
- 7.9 A key aim of PPW11 is to achieve successful placemaking. It confirms at paragraph 2.8 that planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven well-being goals and by using the five Ways of Working, as required by the *Well-being Act*. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle.
- 7.10 A key guiding principle, which applies to economic development (Figure 4, page 17), is achieving the right development in the right place which extends to growing the Welsh economy in a sustainable manner. The planning system should enable development which contributes to long term economic well-being, making the best use of existing infrastructure and planning for new supporting infrastructure and services. Communities, national and local government, businesses, and the third sector must work together to take a long term view, integrating and aligning priorities through greater collaboration to achieve sustainable economic benefits for all in line with the well-being goals.
- 7.11 Section 5 deals inter alia with economic development like that proposed under the planning application. It confirms at paragraph 5.4.1 that the Government defines economic development, least for planning purposes, as the development of land and buildings for activities that generate sustainable long term prosperity, jobs and incomes. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses.

- 7.12 At paragraph 5.4.2, PPW11 confirms that economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services. Economic land uses also include construction, energy, minerals, waste and telecommunications sectors which are also sensitive to planning policy. The Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim. Similarly, growth in innovative, emerging technology and high value added sectors such as advanced engineering, renewable and low carbon energy, digital and bio-technology sectors are also strongly supported. Development plans should consider the role these sectors may play in terms of investment and job creation in their area. This section focuses primarily on traditional employment land uses (B1, B2 and B8) while policies on other economic sectors are found elsewhere in this chapter and other parts of PPW11.
- 7.13 At paragraph 5.4.3, PPW11 confirms that local planning authorities should support the provision of sufficient land to meet the needs of the employment market at both a strategic and local level. Development plans should identify employment land requirements, allocate an appropriate mix of sites to meet need and provide a framework for the protection of existing employment sites of strategic and local importance. At paragraph 5.4.4 PPW11 advises that, wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration. Sites identified for employment use in a development plan should be protected from inappropriate development.

Technical Advice Notes

- 7.14 PPW11 is complemented by more detailed national guidance set out in topic based technical guidance notes known as TANs. These cover a number of topic areas. Those regarded as being directly or of some relevance to the proposed development are summarised below.

TAN 11: Noise (31 October 1997)

- 7.15 Regarding noise generating development, local planning authorities must ensure that noise generating development does not cause an unacceptable degree of disturbance. They should also bear in mind that if subsequent intensification or change of use results in greater intrusion, consideration should be given to the use of appropriate conditions.

- 7.16 Noise characteristics and levels can vary substantially according to their source and the type of activity involved. In the case of industrial development, for example, the character of the noise should be taken into account as well as its level. Sudden impulses, irregular noise or noise which contains a distinguishable continuous tone will require special

TAN 12: Design (31 March 2016)

- 7.17 This TAN notes that the Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment which is fit for purpose and delivers environmental sustainability, economic development and social inclusion, at every scale throughout Wales – from householder extensions to new mixed use communities.
- 7.18 To deliver this, all decision makers across Wales need to understand both the importance of good design and the ways in which it can be achieved. Design is defined in PPW11 as: ‘the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings.’
- 7.19 The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers choice where a single design solution cannot accommodate all users, provides for flexibility in use, and, provides buildings and environments that are convenient and enjoyable to use for everyone.

TAN 15: Development and Flood Risk (30 July 2004)

- 7.20 This planning advice note should be read in conjunction with PPW11 and other technical advice notes and circulars should be taken into account by local planning authorities in Wales in the preparation of development plans. They may be material to decisions on individual planning applications and will be taken into account by the National Assembly for Wales and Inspectors in the determination of appeals and called-in planning applications.
- 7.21 The TAN provides technical guidance which supplements the policy set out in PPW11 in relation to development and flooding. It advises on development and flood risk as this relates to sustainability principles (section 2.2 PPW11) and provides a framework within which risks arising from both river and coastal flooding, and from additional run-off from development in any location can be assessed.

TAN 18: Transport (31 March 2007)

- 7.22 The TAN notes that an efficient and sustainable transport system is a requirement for a modern, prosperous and inclusive society. However, transport, in particular road traffic, can also have negative impacts on human health and the environment. Road traffic growth is a cause of increased local air pollution, greenhouse gas emissions contributing to global warming and climate change and, in some areas, congestion, which can affect economic competitiveness.
- 7.23 On other major travel generating uses, the TAN notes that the location of major travel generating uses, including employment, education, shopping and leisure can significantly influence the number and length of journeys, journey mode and the potential for multi-purpose trips. Development plans should seek wherever possible to identify locations for such developments, which offer genuine and easy access by a range of transport.
- 7.24 Locations that are highly accessible by a variety of travel modes offer significant opportunities to make travel patterns more sustainable. When preparing or reviewing development plans, planning authorities should identify all potential development sites which have high levels of accessibility to non-car modes. Care should be taken to ensure that allocations in these locations are at sufficient densities to fully utilise the accessibility potential of the site and to including housing with other uses where appropriate. Development sites which are car dependent and unlikely to be well served by new public transport, walking and cycling should only be allocated or reallocated in development plans for uses which are not travel intensive.

TAN 21: Waste (23 February 2017)

- 7.25 Regarding general Principles, the TAN confirms that, when considering development proposals for all types of waste management facilities, planning authorities should take into account their potential contribution to the objectives, principles and strategic waste assessments set out in Towards Zero Waste and the relevant waste sector plans and the relevant development plan for the area. The extent to which a proposal demonstrates this contribution, in environmental, economic and social terms, will be a material planning consideration. The aim is to ensure that the right facilities are located in the right place to meet environmental, economic and social needs.

TAN 23: Economic Development (28 February 2014)

- 7.26 The TAN confirms that PPW11 advises that planning for economic land uses should aim to provide the land that the market requires, unless there are good reasons to the contrary. Where markets work well, this will help maximise economic efficiency and growth.
- 7.27 Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development.
- 7.28 LDP employment land targets should aim to ensure that planning meets the demand for land, so that economic growth is not constrained by lack of land. Authorities should work together to steer development to the locations which are the most sustainable and efficient (both when allocating sites for the LDP and when dealing with proposals for development).
- 7.29 On existing employment sites, the TAN confirms that certain industrial and related uses may conflict with other uses, especially housing. To operate effectively, these activities usually need dedicated industrial areas, where they can be confident that they will not be a bad neighbour to anyone. In managing the retention and release of existing employment sites authorities should aim to ensure that the integrity of remaining employment sites is not compromised.

Development Plan

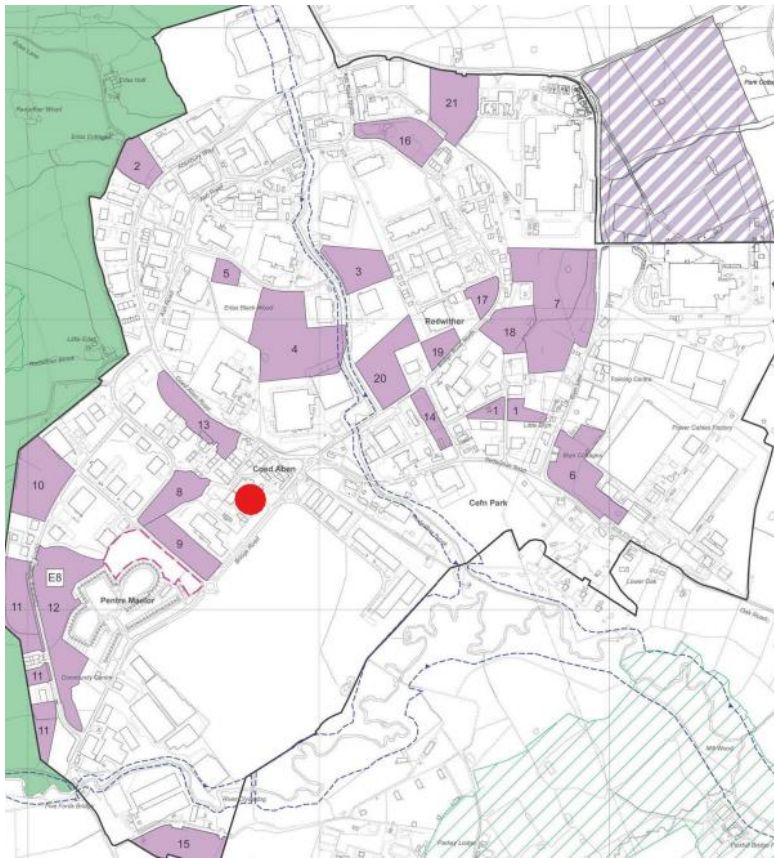
Wrexham Unitary Development Plan

7.30 The Council adopted the Wrexham Unitary Development Plan (“WUDP”) 1996 - 2011 in February 2005. The plan covers the administrative area of Wrexham County Borough. Relevant policies are as follows (confirmed by council through pre-application process):

- PS1 Settlement limits
- PS2 Environmental Impacts
- PS11 Biodiversity GDP1 Development Principles
- T8 Parking
- S4 Large-scale retail development
- EC4 Trees EC6 Biodiversity
- EC13 Surface water run-off
- E4 Employment development within settlement limits

7.31 The list ignores Policy E1. Policy E1 confirms that sufficient land will be allocated for employment development between 2001 and 2011 at Wrexham Industrial Estate and goes onto identify a considerable number of sites/areas of land within WIE for new development. However, these tend to be undeveloped sites/areas of land. Sites like the subject site are not specifically allocated for development under this policy. Instead, employment development on what is termed ‘Unannotated Land within Defined Settlements,’ and we would say that this also applies to Wrexham Industrial estate, are subject to Policy E4 - Employment Development on Unannotated Land within Settlement Limits (also not identified). This supports employment development subject to Policy GDP1 - General Development Principles.

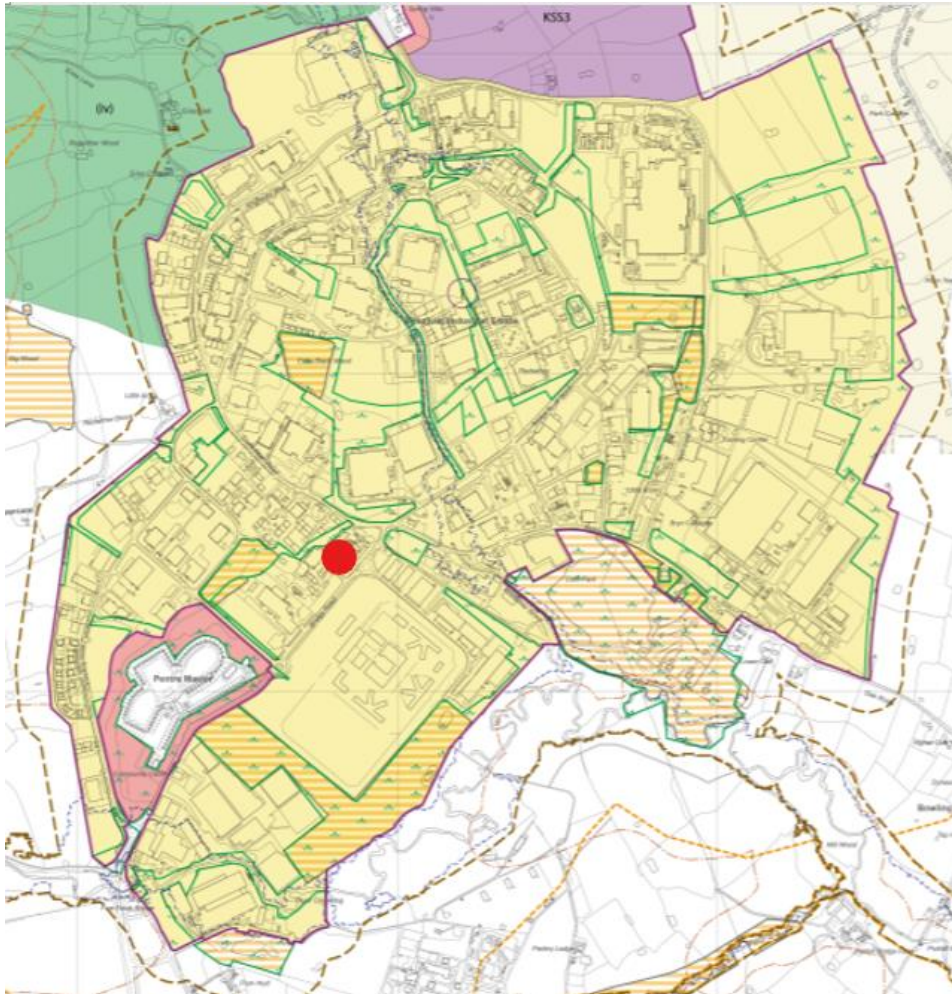
7.32 Figure 4 overleaf provides relevant extract from the Proposals Map.



*Figure 4: Extract Proposals Map, Wrexham UDP
– site marked within Wrexham Industrial Estate*

Wrexham Local Development Plan

- 7.33 The Council is currently preparing a new plan to be called the Wrexham Local Development Plan (“WLDP”) which will replace the adopted WUDP. The plan is advanced having been through its examination stage. It is likely to be adopted later on in 2021 / early 2022. Accordingly, we give weight to how it treats the subject site and the proposed development.
- 7.34 The WLDP confirms that the site is affected by Policy SP10: Wrexham Industrial Estate. Figure 5 overleaf provides relevant extract from the emerging Proposal Map.



*Figure 5: Extract Proposals Map, draft Wrexham LDP
– site marked within Wrexham Industrial Estate*

- 7.35 Policy SP10 confirms that Wrexham Industrial Estate, as shown on the proposals map, will be the primary focus for new employment development in the Borough over the plan period for Use Class B employment and other ancillary related development. Land is also protected on the estate for a strategic ecological network for a number of protected species and habitat.
- 7.36 Consideration of policy suggests that new Use Class B employment development, which is of a good quality and suitable for the site it is proposed to be developed at, subject to including appropriate ecological mitigation proposals given national and internationally protected species that are present at the Industrial estate, can be regarded as acceptable in principle.



Planning Guidance

7.37 Local Planning Guidance Notes of relevance are as follows:

- 15 Cycling
- 16 Parking standards
- 17 Trees and development
- 23 Contamination
- 26 Landscaping and employment development
- 29 Biodiversity and employment
- 32 Biodiversity

8 EMPLOYMENT LAND CONSIDERATIONS

8.1 A separate employment land statement has been prepared by FIREM and Plan Red and has been submitted in support of the planning application.

8.2 Below is a summary of the key findings of that statement:

- Wrexham County Borough's economy has been transformed in the past twenty years from one dominated by heavy and traditional industry into a major high tech manufacturing technology and services hub.
- Like most urban centres Wrexham has suffered from UK wide recessions and changing shopping habits resulting from internet and 'click and collect' shopping options. Footfall in the town centre has dropped by 28.3% since 2010 compared to the national average of 20%. And whilst it remains a concern, compared to UK average there is a lower proportion of empty shops on Wrexham's "High Street."
- It is FIREM's experience that demand for good quality, reasonably priced, well profiled and modern employment units for Use Classes B1, B2 and B8, available on traditional and flexible lease arrangements at WIE, remains very strong (2020/21), and if anything is likely to grow.
- The current structure of the availability of premises is strongly geared towards industrial, with the bulk of this stock being located at Wrexham and Llay Industrial Estates.
- The Employment Land Review 2015 ("ELR") found the existing supply strongly focussed on the WIE with 141.07 of the total 204.91 hectares located on the Estate.
- The availability of an existing employment land supply was not therefore identified as a major issue in Wrexham in the ELR for the purposes of setting an employment land requirement through the emerging WLDP. The supply envisaged some 53% of the net supply able to be brought forward within a 5 year period, and some 23.75 hectares were immediately available.
- However, the ELR did, however, identify that while the County Borough as a whole in theory has sufficient land to meet its needs, qualitative research undertaken indicates a growing land supply shortfall, relating to identified land on the Wrexham Industrial Estate.
- The review found a continuing strong demand for sites on the Estate and a shortfall of readily available land on which to create an offer for the future marketing of the Estate to inward investors or existing businesses.

- Furthermore, the development of the North Wales prison on the Estate has had the effect of boosting market demand at the Estate as supply chain and affiliated companies seek to locate/ expand close to the facility.
- The above is certainly the experience of FIREM. It is its experience that not only is there a shortage of readily available land but there is also a shortage of good quality modern industrial units that fall within the small to medium floorspace range, and which are available on flexible lease term arrangements. By this we mean opportunities for start-up businesses taking their first unit/floorspace (in small unit) to jump from this profile of unit to a larger unit once the business has started to grow and succeed and so on. This is what we term accommodating cradle to adulthood floorspace needs. It is also FIREM's experience and that of its agents that there is an increasing general shortage of undeveloped/greenfield land at WIE for employment development that falls into the categories of medium to large scale units which offer potential to accommodate larger businesses enterprises.

8.3 Based on work undertaken by FIREM and its agents and reflecting FIREM's experiences as a developer and landlord, including at WIE, and also reflecting approaches to both by businesses and enterprises wishing to take new floorspace/units, FIREM's view of the local employment land and premises market along with local demand (2020/first half of 2021) is as follows:

- There continues to be a steady flow of enquiries for modern and fit for purpose industrial units at WIE (Modern and fit for purpose industrial units is defined as follows:
 - Unencumbered operational floorspace.
 - High floor to ceiling clearances (10 m+ in some units).
 - Large doors/gates.
 - High security with roller shutter doors.
 - Dedicated yard/service areas.
 - Dedicated car parking.
 - Integral offices in larger units.
 - Integral w/c and related employee accommodation.
 - Easy access to/from main access serving site.
- The size of units for which there is currently good demand is as roughly follows:



- 93 sqm (1,000 sqft) GIA floorspace.
 - 139 sqm (1,500 sqft) GIA floorspace.
 - 279 sqm (3,000 sqft) GIA floorspace
 - 464 sqm (5,000 sqft) GIA floorspace
 - 743 sqm (8,000 sqft) GIA floorspace
- The types of leases that occupiers generally want are as follows:
 - 5 years with incentives and break clause after 3 years.
 - 10 years with incentives and break clauses after 3 and 7 years.
 - 15 years with incentives after 5 and 10 years.
- Demand for new larger units but delivered through bespoke new build on undeveloped land.
- Generally, while there continues to be demand for older more constrained units in terms of type of accommodation, issues with these types of units, as expressed by current and potential occupiers, is as follows:
 - Low ceiling height is an issue.
 - Encumbered working areas is an issue.
 - Generally limited scope for flexible use.
 - Doors/gates too small.
 - Maintenance costs high.
 - Perception issues.

9 PLANNING ASSESSMENT

Approach

- 9.1 This section of the statement sets out whether the proposed development accords with the provisions of the local development plan, this by reference to the planning decision making framework applying in Wales as set out in Section 7 of the statement. In so doing it also considers whether the planning application can be regarded as acceptable by reference to relevant material considerations and usual planning and land use considerations.
- 9.2 Our assessment and case in support of the planning application is presented by identified key topic areas leading to our conclusion that the planning application accords with relevant development plan policy, and other policies and guidance, and therefore a recommendation to grant planning permission.

Principle of Development

- 9.3 The site is located in the heart of the Wrexham Industrial Estate, (“WIE”), a defined location in adopted and emerging development plan for existing and future industrial development and uses.
- 9.4 The site is previously developed land and partly occupied, for industrial and some retail uses, already generating considerable levels of activity. The redevelopment will maintain the use profile of the site, but increase the amount of industrial floorspace, a more efficient use of the land opportunity available and providing more employment opportunities. It is a sustainable development by location, approach and socio-economic benefits.
- 9.5 The new development arrangement of the site will serve to significantly improve the offer and the longevity of the employment benefits that accrue in a local and regionally significant location. The site has to be regarded as eminently suitable for the proposed development and the principle of built form of the development at the site is well established within its surroundings.
- 9.6 All these points are important material considerations in support of the application in principle.

Employment Land Considerations

- 9.7 As is set out in the preceding section of this statement, there is recognised and strong need, plus market demand, for the type and profile of industrial units that the planning application proposes including at WIE.
- 9.8 The proposed development will improve and contribute significantly to the supply of modern fit for purpose industrial units serving the local and sub-regional area and meet related demand. It will be a significant asset to WIE and increase its attractiveness to the local and wider regional market. This also applies to Block B, which is to be retained but will be improved, as this contributes to the overall safe and efficient operation of WIE.
- 9.9 Overall, these are important material considerations in support of the planning application.

Profile of Application Site

- 9.10 Although it is not a matter of direct concern to land use planning and the form of built development, it is important to socio-economic impact to record that it is the intention of FIREM as landowner and developer to assist existing business / uses / operators in the industrial units to either relocate to one of the new units being created or to other units within FIREM's control elsewhere within WIE. This will be achieved by the phased demolition and construction of the planned units, thereby maintaining existing employment and business continuity.
- 9.11 Also of relevance, the current use of the site is industrial and is a use which generates noise and activity and visits from the public and vehicular movements throughout the day. The commercial uses fall within Use Classes B1, B2 and B8. The fact the site is located in the heart of a well-established industrial estate, WIE, means that these uses can be carried out without impacting on other uses like residential. Indeed, although there is an area of residential to the south west of the site, which was developed as part of the original munitions factory operations, this is some distance away, and is separated by screen planting, other premises, road and barriers.
- 9.12 The reason for making this point is that the planning application proposals will not change the current use profile of the application site and development it currently supports, and these are uses that are appropriately located there by reference to the allocation of WIE in the development plan. Accordingly, the current use/development will be replaced but only by a modern and updated version of the use/development that the site currently supports

and is allocated for. And like the current use and its operation the new development will not impact on amenity levels enjoyed by softer uses like residential which although in the wider vicinity are sufficiently distant not to be adversely affected.

- 9.13 These are factors to be considered in support of the proposed development.

Adjoining Uses and Surroundings

- 9.14 As has already been confirmed, the site is in a well-defined and established industrial estate, WIE, which is allocated for this use. As such it is a site which is intended to support uses and activities that generate activity and noise across the working day. Developing uses like those proposed under the planning application (Use Classes B1, B2 and B8) at the application site safeguards other sites and locations from development of this ilk, which is also a point in favour of the application.

Floorspace Considerations

- 9.15 Combined employment floorspace will be 10,307 sqm GIA created across Blocks C – J, delivering a net increase in employment floorspace of 6,300 sqm GIA (10,307 – 4,007 sqm). The net increase is achieved through the demolition of all existing buildings except the retained Block B element and redevelopment for 8 new Blocks C - J containing a range of new units with a combined total of up to 52 units¹. Retained Block B maintains 674 sqm in retail, food and drink units with no material change in use of units or floorspace. Therefore the combined total floorspace of the development site, i.e. Blocks B to C inclusive, is up to 10,981 sqm, a net increase of 6,300 (10,981 – 4,681 sqm). As already described, what would have been Block A has been dropped and is not part of the planning application.
- 9.16 The proposal therefore delivers a significant benefit in the amount of employment floorspace provided compared to the existing site, a more efficient use of land which is a central objective of land use planning and sustainable development principles. It is of course a suitable intensity of the use of the land with regard to the well-established and defined Wrexham Industrial Estate within which it is located. And more employment floorspace offers the opportunity for more business, enterprises and jobs to be created. This is an important material consideration in support of the planning application.

¹ Refer to Area Schedule 1182-1101-001 for detail breakdown

Employment Support and Generation

- 9.17 The Bridgeway Centre currently supports 20 business involved in a range of employment activities primarily falling within Use Classes B1, B2 and B8 and also other retail businesses within Block B. The position is fluid as some tenancies are short-term, but current calculation is the businesses provide in the region of 100 full-time equivalent jobs (“FTE”)².
- 9.18 Guidance in the *Employment Density Guide, 3rd Edition*, HCA (2015) sets multipliers of FTE job creation by floorspace and use. A range of employment density results across the B1, B2 and B8 uses ranging from high density office to low density warehouse and distribution uses. Reflecting the current businesses and the range of units being promoted, many for small and medium size enterprises, an average rate of 1 FTE per 47 sqm which aligns with Use Class B1c light industrial is applied for this assessment³. For context a higher density uses would be B2 use (1 FTE job per 26 sqm) or lower density B8 uses (1 FTE job per 70-77 sqm for final mile or regional distributors). Use Class B1c in this context takes a mid-position.
- 9.19 Existing employment floorspace which is in a range of B1, B2 and B8 uses is 4,007 sqm GIA. Applying the B1c multiplier this suggests employment around 85 FTE persons ($4,007 \text{ sqm} \div 47 = 85.3$). This calculation excludes the retail, food & drink unit employees and is lower than estimated actual employment on site but is within a reasonably narrow margin of error.
- 9.20 In the new proposals Blocks C to J the combined floorspace for 10,307 sqm may potentially create employment for 219 FTE jobs ($10,307 \div 47 = 219.3$). Once more this figure excludes the retail employment but is a directly comparable calculation so it is possible on a consistent basis to identify a 134 (219 -85) FTE job increase.
- 9.21 We have not sought to develop this raw 134 FTE figure through an additionality assessment because the variables on the number of employers who may be retained on site, relocate within WIE, expand, close or be new industry have considerable permutations and effectively cancel each other out⁴. But what is possible to conclude is that there is a 6,896 sqm net increase in floorspace for employment uses, that increase in floorspace brings an

² FIREM advice is 108 FTE employment at November 2021

³ Employment Density Guide, 3rd Edition, HCA (2015), Section 4

⁴ Permutations include assumptions of unit sizes / number in outline; operator specifications; availability other units in WIE

opportunity for circa 134 FTE additional jobs which is a considerable benefit of the proposed development and an important material consideration in support of the proposed development.

- 9.22 There is also further employment benefit from temporary construction employment.

Access and Transportation Considerations

- 9.23 Access and transportation matters are covered in detail in the Transportation Report prepared by Prime Transportation. This extends to covering how the site is proposed to be accessed; how it can be accessed by different modes of travel; the operation of the transportation elements of the wider scheme, which takes into account car parking and other parking provision; and the impacts and effects of the proposed development on the local network and other transportation matters of relevance.
- 9.24 As we have already confirmed, the site is very well located in accessibility, sustainability and transportation terms being located in the heart of WIE. It can be accessed on foot from the residential area nearby. It can also be accessed on cycle with two proposed secure cycle store facilities provided on site to encourage such use (44 space combined capacity). WIE is served by a number of bus services that link with Wrexham and serve locations and centres further away. These focus on the town centre and as such the site can easily be reached by those travelling from Wrexham on public transport.
- 9.25 Obviously the site can also be accessed by private car and parking onsite for up to 228 vehicles will be provided, including disabled spaces (24 spaces) and 6 EV charging spaces. The TA confirms that the all movements junction on Bridge Road that serves the site means traffic from the south west and north east can easily and safely access the site. It should also be remembered that WIE is well served by the local road network which includes trunk and primary routes serving the motorway network and major centres further away.
- 9.26 In summary, we would say that the site and proposed development can be regarded as highly sustainable in terms of its approach to transportation, and this is also reflected in the conclusions of the Prime Transport Report. This also includes a Green Travel Plan which confirms that workers at the site will be encouraged to use sustainable modes to travel to work as will visitors.

- 9.27 The Transportation Report also confirms that the overall impact of the proposed development on the local highway network is acceptable and little different to that associated by the current use of the site.
- 9.28 Overall, we note all of the key findings and conclusions of the Transportation Report by Prime Transportation and from these have been able to conclude that the overall effects and impacts of the transport related elements of the planning application and the proposed development it promotes can be regarded as acceptable.

Ground Conditions

- 9.29 The planning application is supported by a Phase 1 Preliminary Risk Assessment, (Barnsley Marshall), which confirms the site's credentials for redevelopment for the proposed development.
- 9.30 The application site is brownfield, industrial and already developed in its contexts and as such it can be regarded as suitable for new development for new industrial through the redevelopment of the existing structures on site. The site's history of munitions manufacture and storage means that the applicant is happy to accept a planning condition requiring related procedures to be put in place should any historic munitions be identified during construction.
- 9.31 The planning application and proposed development can be regarded as acceptable and supportable by reference to ground conditions.

Ecology, trees and landscape

- 9.32 At pre-application stage an ecology report was requested, this to focus on the potential of existing areas of the site and buildings on site to support individual or colonies of great crested newts and bats. Historically, and associated with these proposals, extensive ecology surveys were carried out by ecological advisors, UES, (in previous years and also 2020), and these are set out in the Preliminary Ecological Appraisal, Bat Scoping Survey and Bat Presence / Absence Survey, all produced by UES.
- 9.33 The overall findings on habitats consider it unlikely the development will have any direct or indirect impact on any designated sites in the wider assessed area. Existing on site hedgerows are species-poor and managed for amenity / ornamental purposes, but as part of future detailed landscape proposals can be replaced with only native species if hedgerows are used. Loss of trees including 0.2 ha of woodland on site for development should be

mitigated by replacement of suitable native variety. This can be detailed through planning condition combining landscape and ecology benefits in an approved planting scheme. Protection of offsite woodland will be required through a construction management plan and shielded from lighting during construction and in permanent operational stage.

- 9.34 A watercourse (unnamed brook) is located to the northwest site boundary. It will be unaffected by development situated away from building works, but through planning condition appropriate measures should be put in place during construction to ensure there is no risk of runoff from construction activities. A 5m buffer zone is recommended.
- 9.35 On matters of species it is considered great crested newts are unlikely to be on site because of existing activity and habitat. It is recommended 'reasonable avoidance measures' are used and overseen by ecologist during construction which can be secured by relevant planning condition(s).
- 9.36 Four existing buildings were initially identified for bat presences. Subsequent survey identified two individual bats (of two species) roosting across two locations on site, likely male and likely not using buildings for hibernating. It is advised that due to presence of roosting bats in Buildings 1 and 2⁵ that works must be completed under EPS mitigation licence issued by NRW which may only be applied for following a grant of planning permission. Subject to consultation of the application with NRW and any requirements falling out of that consultation a strategy for remediation, including felling control of trees, can be developed for the new development which will be controlled through relevant planning condition and licence. Such mitigation would include use of bat boxes affixed to buildings and/or trees, appropriate design of lighting and control of light spillage.
- 9.37 It is proposed that development can bring compensation and enhancement to bird habitat through the planting and management of hedgerows, berry and nut producing shrubs, a mosaic of planting to encourage nesting and nectar bearing flowers to encourage invertebrates. Bird boxes are also proposed. Measures will be holistically drafted with landscape proposals to maximise the enhancement value for agreement through relevant condition, including a landscape management plan.

⁵ Building 1 is Block B part to be demolished and Building 2 is located behind in the position of proposed Block C, Units 12 or 13. Compare Proposed Plan 1182-02-003-P15 and UES Bat Presence / Absence Survey UES03012/03 Appendix 1

- 9.38 One final measure for control through development is the treatment and removal of cotoneaster an invasive species identified on site. Control measures can be agreed through condition / construction management plan.
- 9.39 The overall findings and key conclusions of the ecology reports and recommendation is that great crested newts are unlikely to be a site concern and can be managed through licence; bats will require specific measures to control demolition / construction and mitigation to provide suitable habitat in the new development; and, landscape design should focus on native species and planting that supports nesting birds and invertebrates to lead to an enhancement of the biodiversity of the site.
- 9.40 At this stage of submission it is intended to agree to a suitable range of conditions to control and approve such measures which are inter-related in terms of the overall habitat value being created. Statutory consultee input will inform this process and the applicant / design team will respond through the application process with additional information if sought.
- 9.41 This approach to ecology and landscape by FIREM in its role as applicant and development, reflects other applications and schemes for industrial/employment developments/units at WIE, and can be regarded as tried and tested, and appropriate to the site circumstances and profile of the proposed development.

Flood Risk and Drainage

- 9.42 Flood risk and drainage were topics that were identified at pre-application stage as needing to be addressed through the planning application. Accordingly, the applicants commissioned Sutcliffe to investigate the potential of the application to be at risk of flooding and regarding how drainage might be dealt with – Flood Risk Assessment & Drainage Report.
- 9.43 As referenced in the ecology assessments there is a watercourse to the northwest edge of the site which is described as a ditch that joins up with Redwither Brook that drains into the River Clywedog, located approximately 1.1 km to the east of the site. The site is identified in Flood Zone 1 – lowest level of flood risk. The report identifies the proposals are acceptable with no constraints relating to flood risk.
- 9.44 Overall, it can be concluded, by reference to the above, that the application site can be regarded as being at low risk of all forms of flooding and can be regarded as acceptable for development of the profile proposed under the planning application.

- 9.45 The report sets out the assessment and findings on sustainable drainage and a proposed surface water drainage layout (Appendix D). The Report and proposed layout are put forward for approval for control through planning condition. Though the Report and design includes the outline and detailed application area a planning condition to the outline element will be required to resubmit details that align with future reserved matters layout following the principles set in this document. The Report confirms that the proposed arrangements satisfy site and policy related needs for drainage (foul and surface water).

Noise impacts

- 9.46 The nature of the application and the profile of the proposed development confirm that the development will not generate noise related concerns or issues and as such this is not a topic that should be of concern to the council.

Impacts on heritage assets and Archaeology

- 9.47 There are no identified heritage assets at or in the vicinity of the planning application site.
- 9.48 The pre-application response included comments from the council's Development Control Archaeologist confirmed that information currently held on the Historic Environment Record does not initially indicate any archaeological records in the development area. It suggests that, based on mapping from the 1940s-1950s, some of the smaller brick single-storey buildings to be demolished are probably of WWII origin and associated with the long closed former munitions factory which operated at the WIE. Although it is acknowledged that all have been converted for later use, some buildings survive essentially intact, although this is not conclusive. The consultation response claims that the WWII building functions and importance within the overall former ROF Wrexham munitions factory area is not understood at this time and that the buildings are not recorded.
- 9.49 On the last point of suitable recording and information we are not sure this is the case based on information and records available now. As such it is suggested that a pre-determination historic buildings assessment be provided (as part of a Level 3 study of the buildings) so that their heritage value can be assessed and suitable mitigation discussed. This should be completed in accordance with the PPW11 and TAN 24 (May 2017).
- 9.50 The comments of the officer we understand is a desk-based review. We can confirm that the surviving buildings have been substantially remodelled and modernised to enable them

to be used for industrial/employment purposes, some multiple times. It is our view the heritage value may now be very limited given the level of modification and changes they have been subjected to since they were originally used for the purpose they were developed for. Nevertheless, the applicants agree to record and provide a written and photographic record of the buildings prior to them being demolished and would accept a planning condition to this effect. As such the development will provide an opportunity to record and better understand the site history.

Visual impacts

- 9.51 The existing development at the site comprises visually unattractive industrial profiled buildings albeit in a semi-modernised form mainly through the addition of cladding. The development of a contemporary high quality designed series of employment blocks will improve the visual attractions of the application site. Furthermore, there are no safeguarded or identified views to be retained or protected, plus the type of development proposed is now commonplace at WIE. And it should be noted that, given the industrial and urban contexts of the site's hinterland, which include a large prison to the south east, views of it from distance are very limited. As such there are no visual impact related concerns relating to the planning application and the development it promotes.

Design and layout

- 9.52 The proposed design and layout of the scheme is of a high quality and right for the site. The approach to site layout, unit design, materials etc., is described in greater detail in the DAS by MCAU Architects. For the sake of brevity we do not repeat this in the statement but note the conclusions of the DAS that the layout and design of the proposed development is acceptable and appropriate and supportable by reference to all levels of planning policy.

Sustainability

- 9.53 Development and construction related sustainability matters are also covered in detail in the Design and Access Statement, but we can confirm that the proposed development satisfies relevant standards and is of a high quality in terms of its sustainability credentials.

Retail Benefits

- 9.54 The planning application retains Block B and the retail uses that it supports albeit in an improved format. These are regarded as important local services by other businesses and

enterprises at the WIE. Retaining this block and the businesses it supports is a benefit of the planning application.

Conclusions on planning and land use considerations

- 9.55 Before we consider and address whether the proposed development accords with development plan policy, as this is the key consideration in the planning decision making framework in Wales, we conclude on whether the planning application and the proposed development it supports, by reference to the planning and land use matters set out above, can be regarded as acceptable and supportable. This is because some of the topic areas set out above feed into or of direct relevance to specific planning policies identified in Section 6 as being of direct relevance.
- 9.56 Following the detailed assessment set out above, it is our view that the planning application and proposed development it supports can be regarded as acceptable by reference to the site's profile, ground conditions, design and layout, transportation, ecology, noise, flood risk, drainage and services profiles and all other matters considered. This balance is reached on the basis of some of the discussed points – particularly around ecology, trees and landscaping that is acknowledged will require further consultee review and response from the applicant / design team to allow determination of the application.

Accordance with Development Plan and Other Planning Policy

- 9.57 Further to the detailed assessment set out above, we now consider whether the planning application accords with relevant policies in the WUDP. These were identified for us through the pre-application process. Based on the detailed assessment set out earlier in this section, it is our view that the planning application can be regarded as one that accords with relevant development plan policy. The policies in question are: PS1 Settlement limits; PS2 Environmental Impacts; PS11 Biodiversity GDP1 Development Principles; T8 Parking; S4 Large-scale retail development; EC4 Trees EC6 Biodiversity; EC13 Surface water run-off; E4 Employment development within settlement limits and Policy E1 Sufficient Land will be Allocated for Employment Development Between 2001 and 2011 at WIE; Policy E4 Employment Development on Unannotated Land within Settlement Limits will be permitted subject to Policy GDP1.
- 9.58 We are also of the view that the proposed development broadly accords with policy in the emerging WLDP, which will shortly be adopted and is therefore an important material consideration in the determination of the planning application, particularly when one

considers policies that deal with industrial development at existing developed sites and in areas like WIE which are allocated for employment.

- 9.59 The location and profile of the application site in the heart of the WIE means that the site can be regarded as suitable for industrial/employment developments. This includes developments of the form and scale of those promoted under the planning application. This means that policy on development in settlements and existing employment sites can be satisfied and accorded with.
- 9.60 Furthermore, the fact that the planning application site is located within WIE means the site has to be regarded as one of the best profiled sites for this form of development, which adds weight to our view that the policies dealing with WIE and employment development are accorded with.
- 9.61 Regarding whether policy on layout, design and placemaking is accorded with, it is our view that the development is of a high quality, is appropriate to the site in terms of its scale and function, will complement existing uses on WIE, will not adversely affect its surroundings/surrounding uses, will contribute towards the health and general vitality and viability of the district and town of Wrexham and will generally benefit its local community through the provision of good quality jobs.
- 9.62 The development will also deliver a consider number of new jobs, which policy in WUDP and WLDP strongly support, and which will assist in sustaining the economy of Wrexham.
- 9.63 The proposed development will deliver sustainability and many other benefits. As such, and overall, the development can be regarded as according with all policies dealing with this topic.
- 9.64 Based on the key findings and conclusions set out earlier in this section, which is drawn from our assessment of work on flood risk and drainage, it is our view that policy on flood risk management and drainage is accorded with.
- 9.65 On transportation, the Transport Report by Prime Transportation, summarised earlier in this section, allows us to conclude that policy on sustainable transport and active travel can also be generally accorded with.
- 9.66 Regarding policy on ecology and trees and environment, the relevant statements by UES which deal with these topics which have been prepared and submitted with the planning



application confirms that the planning application can be regarded as generally according with relevant policies.

- 9.67 Overall, the planning application and the proposed development it supports can be regarded as according with the currently adopted development plan and also the emerging but soon to be adopted plan; also the provisions of national planning policy set out PPW11 and relevant TANs identified in an earlier section. It can also be regarded as being acceptable by reference to all usual and applying planning and land use considerations.
- 9.68 As such the planning application can and should be granted planning permission by reference to the statutory decision making framework applying in Wales as set out in an earlier section of this Statement.

10 CONCLUSIONS

- 10.1 The Application Site is currently developed and in use for industrial development
- 10.2 The planning application is for the redevelopment of the site to provide a range of new, modern industrial units to meet the needs of a range of occupiers. The applicant is FIREM which has considerable experience of this type of development including at WIE.
- 10.3 In planning policy terms the site is located within the defined area of WIE. It can be regarded as appropriate for the form and profile of development proposed under the planning application.
- 10.4 WIE is a well-established and very large industrial estate which dates from WWII. Surrounding the site is a mix of industrial and employment developments and also a large prison. Further away is a zone of residential albeit this is well screened from and separate from the site. Accordingly, in land use terms the site's context is developed and mainly industrial and commercial in profile and is very typical of estates of this ilk. The developed and in use status of the site means it can be treated as a brownfield site/development opportunity.
- 10.5 The site is allocated in the development plan for the area, the WUDP, soon to be replaced by the WLDP, for industrial uses and development including those like the proposed development.
- 10.6 The application site's location in the WIE make it eminently suitable for industrial and employment development generally but it is particularly suited for multi-unit developments like that proposed under the planning application.
- 10.7 The proposed development is for a contemporary styled employment/business park, for a range of blocks and units, with dedicated car parking and servicing facilities accessed off Bridge Road. The proposed development, through the main blocks of development and the units they support, has been designed to be occupied and operated by a wider range of businesses and enterprises.
- 10.8 Existing employment will be retained and the scheme, through the new units and additional floorspace it will deliver, provides scope for this to be increased and by some margin. Overall, the new development could support a large number of jobs.



- 10.9 The proposed development would be a tremendous asset to WIE and Wrexham and would add considerably to its assets as a major centre for employment serving its current local and regional catchment.
- 10.10 The proposed development accords with the site's planning policy allocation/designation in the WUDP and the emerging WLDP (part of a designated industrial/employment zone) and which supports industrial/employment development in such locations. The planning application also accords with national planning policy in PPW11 and related TANs.
- 10.11 In addition, the planning application can be regarded as acceptable by reference to its impacts and effects on the local road network (transportation considerations), bio-diversity and ecology (bats), amenity of existing uses including residential (noise), ground conditions, flood risk and by reference to all other usual planning and land use considerations and can also be regarded as according with related planning policies of the WUDP and WLDP.
- 10.12 Overall, the planning application for the proposed development can be regarded as acceptable in planning terms including by reference to usual planning policy and general planning and land use considerations. Accordingly, the planning application can and should be granted.