



PRE-APPLICATION CONSULTATION REPORT (PAC)

In support of a proposed development for the Erection of extensions to an industrial unit, construct a second means of access, reconfigure the service yard and parking, provide landscaping and undertake ancillary works

“Dragon Packaging” Units 47 and 48 Clywedog Road South, Wrexham Industrial Estate LL13 9XN

Made on behalf of FI Real Estate Management Ltd

NOVEMBER 2022

DOCUMENT REFERENCE: FI009-03V2



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APPENDICES

- 1 Consultation responses
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DATE	NOVEMBER 2022		
PROJECT REFERENCE	FI009		
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1 INTRODUCTION

- 1.1 Plan Red has prepared this Pre-Application Consultation Report ('PAC') on behalf of FI Real Estate Management ('FIREM'), the owner of the site and applicant. FIREM is making the planning application on behalf and for the benefit of the existing tenant "Dragon Packaging Ltd."
- 1.2 This Report sets out statutory pre-application process undertaken, the comments received from that process and the response of the applicant and its development team to those comments and how this is reflected in the planning submission now being made.
- 1.3 The PAC and this Report is a statutory requirement for all major development proposals, which this is one by reason of its nature, character and scale. The relevant legislation is set out in section 61Z of the *Town & Country Planning (Development Management Procedure) (Wales) Order, 2016* and related guidance *New Development Management Procedures*, February 2016.
- 1.4 The report is set out as follows:
 - Section 2 summarises the comments received from residents, businesses and specialist consultees – this is supported by full details set out in Appendix 1
 - Section 3 sets out the response of the applicant and development team to the comments and how the application now being made responds to those comments
 - Section 4 summarises the consultation process undertaken – this is supported by copies of relevant letters and notices in Appendix 2

2 COMMENTS RECEIVED

- 2.1 Appendix 1 provides a full copy of comments received through the consultation process.
- 2.2 Comments were received from the following statutory and non-statutory bodies within the 28-day statutory period which elapsed on 13th October:
- Abenbury Community Council
 - Natural Resources Wales
 - Wrexham MBC – Environmental Health
- 2.3 At time of preparing this report on 31st October no further responses had been received.
- 2.4 No comments were received via email from the online consultation portal. Details of the online consultation are provided in Appendix 2.
- 2.5 No comments were provided in person at the offices of F Lloyd where the draft application drawings and documents were made available for viewing.

Natural Resources Wales ('NRW')

Comment 1 – European Protected Sites

- 2.6 Insufficient information provided relating to protected sites and NRW may object if this information is not provided at application stage.
- 2.7 NRW also advise that based on the information submitted that it would seek imposition of planning conditions to any grant of permission relating to protected species, and without such conditions NRW would object to the application.
- 2.8 On the matters of European Protected Species the comments of NRW follow its review of the submitted Preliminary Ecological Appraisal, prepared by UES for the applicant. NRW specifically comments on Great Crested Newts as follows:

We consider that Wrexham Industrial Estate and its environs supports a nationally important population of great crested newt. This species and its breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and they classed as a material consideration for planning under the provisions of Technical Advice Note 5: Nature Conservation and Planning (TAN 5).

In our view, we consider that construction and operational phases of the proposal have the potential to adversely affect the great crested newt at this site. We therefore advise in support of any planning application, that you provide an overall framework strategy statement in respect of conserving great crested newt both during, and post construction. The Framework Strategy shall include outline approaches in respect of Great Crested Newt avoidance, mitigation, habitat provision and management, consideration of preventing incidental capture or killing (during and post construction); biosecurity and evidencing compliance with implementation of conservation proposals.

We would also advise the Local Planning Authority when consulted on any subsequent planning application, that they include a condition within any permission for an Amphibian Conservation Plan be submitted:

- 2.9 The following conditions are outlined by NRW on the basis the planning application will be supported by Framework Strategy for the conservation of great crested newts:

Condition 1 - No development shall commence until an amphibian Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan shall include, but not necessarily be limited to:

- (i) Build upon the principles outlined in the ecological report (Clark, E. (2021). Preliminary Ecological Appraisal: Dragon Packaging, 47- 48 Clywedog Road North Wrexham Industrial Estate, Wrexham LL13 9XN. United Environmental Services Ltd. (Unpublished Report No UES03537/01))
- (ii) Submission of details and associated plans concerning GCN avoidance and mitigation measures including, but not limited to: amphibian fence design, specifications and proposed locations; consideration of access issues across fence lines); fence monitoring and maintenance requirements; and supervised removal of barrier fences. Submission to include proposed timescales and reporting requirements
- (iii) Submission of further details concerning the provision of an amphibian conservation area. Details to include plans, extent, habitat creation and enhancement proposals (ideally including pond construction) access, together with current and any proposed changes to tenure;
- (iv) Submission of a site management plan for the ecology area. Details to include
 - defined aims and objectives
 - habitat management prescriptions for aquatic and terrestrial habitats;
 - Detail of the skills and competencies required by those undertaking the works, surveillance or activities including whether they require European Protected Species licenses for the activities proposed;
 - provision for periodic review mechanism for the Environment Management Plan; and
 - current and proposed changes to tenure of the ecology area (freehold tenure of the defined ecology area to be approved by the discharging Authority in consultation with Natural Resources Wales) to ensure appropriate control over the land is established and the effective targeted delivery of long-term actions;
 - Monitoring and surveillance (25 years)

- (v) Submission of measures designed to prevent the accidental capture/killing of newts (amphibians) during the operational phase of the proposal. This is essentially the installation and maintenance of an amphibian friendly surface water management system that does not include gully pots (or other similar features);
- (viii) Ecological Compliance Audit, including key performance indicators
- (ix) Persons responsible for implementing the works
- (xi) Submission of a biosecurity risk assessment

The amphibian Conservation Plan shall be carried out in accordance with the approved details.

- 2.10 NRW confirms that the above approach is based upon the presented draft proposals and any revisions may require reconsideration should this adversely impact on great crested newts and changes the potential mitigation measures.
- 2.11 NRW note the requirement for a licence following grant of permission to carry out works which is contingent on a consistent approach to the development proposal.
- 2.12 NRW concur with the findings of the Preliminary Ecological Appraisal in respect of hazel dormouse, water vole and otter.

Comment 2 – Protected Sites

- 2.13 NRW notes the site is located within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC) and refers to its advice on 21st January 2021 and evidence package outlining phosphorus levels for rivers within SACs.
- 2.14 NRW refers to its July 2022 advice that the local planning authority must consider the phosphorus impact of proposed developments on water quality within SAC river catchments and to consider whether this proposal would increase the volume of foul discharge from the site in planning terms.
- 2.15 NRW notes and cross-references the applicant's submission in the Planning Statement that it is the applicant's view such increase will not occur due to the nature and character of the development. NRW advises is it ultimately for the local planning authority to consider this matter in light of its standing advice and the proposal. Providing the authority is content that the development is not likely to have a significant effect on the SAC it has no objection to the proposal. Conversely if it is not content that it is advised to consult NRW as part of an Appropriate Assessment under Reg 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Comment 3 – Land contamination

- 2.16 NRW's comments are made have had reference to the submitted Phase 1 Site Investigation Report, prepared by Integra in support of the application.
- 2.17 On the basis of the past historic use of the site / wider area as a WWII munitions production facility, NRW raises concern on land contamination and seeks imposition of 5 planning conditions as follows:

Condition 2– No development shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, has been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

Condition 3 - Prior to the occupation of the development, a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

Condition 4 - If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Condition 5 - No development shall commence until details of piling or any other foundation designs using penetrative methods sufficient to demonstrate that there is no unacceptable risk to groundwater have been submitted to and approved in writing by the Local Planning Authority. The piling/foundation designs shall be implemented in accordance with the approved details.

Condition 6 - No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

- 2.18 NRW provides further standing advice for informative(s) to the local planning authority to apply to any grant of permission relating to land contamination.

Comment 4 – Flood Risk

- 2.19 NRW notes the site lies within Zone A of the Development Advice Maps (DAM) within TAN 15 Development and Flood Risk (2004). For development located in Zone A the justification test is not applicable and surface water requirements apply. Given the location NRW consider surface water requirements can be assessed by the local authority as to the suitability of the proposals.

WBC Environmental Health

Comment 5 – Proposed conditions

- 2.20 Environmental Health officer proposes four planning conditions on the basis of the proposed development without further commentary on the proposals. Those conditions are:

- 1) No part of the development shall commence until an appropriate Dust Management Scheme has been submitted to and approved in writing by the Local Planning Authority. The dust mitigation measures as approved shall be fully implemented for the entire duration of the construction phase.
- 2) The rating level of any noise generated by reason of this development, including from air handling plant, shall not exceed the pre-existing background level at any time. The noise levels shall be determined at nearby noise sensitive premises, and measurements and assessment shall be made in accordance with BS4142:2014 Methods for rating and assessing industrial and commercial sound.
- 3) All works in relation to the implementation of this permission, including deliveries to and /or leaving the site, should be undertaken only between the hours of 07.30 to 18.00 Monday to Friday, 08.00 to 14.00 on a Saturday, and at no time on a Sunday or a Bank Holiday. Outside these times, any works which are audible beyond the site boundary have the potential to cause unreasonable disturbance to neighbouring premises.

The applicant is advised that the Council has the option to control construction noise by serving a Control of Pollution Act 1974, Section 60 Notice where deemed necessary, and failure to comply with such a Notice can result in prosecution.

The applicant is further advised that any complaints received relating to noise of any type from the development may also be investigated using the Council's Standardised Procedure for Dealing with Noise Nuisance Complaints. This is done under the Statutory Nuisance provisions provided within the Environmental Protection Act 1990, and legal action may be taken where appropriate.

The applicant must adhere to the times given above wherever possible. If, however, there are urgent or unavoidable circumstances requiring work outside of the specified times, permission to proceed may be sought by contacting Environmental Health & Housing Standards at healthandhousing@wrexham.gov.uk or 01978 292 040. Please use the same contact details for any other enquiries regarding construction / demolition site noise.

- 4) Burning of waste generated from construction activities is not considered to be an appropriate method of disposal and action may be taken as follows:

Under the Environmental Protection Act 1990 anyone found disposing of construction site waste by burning is likely to be in breach of their duty of care with regard to waste disposal;

Under the same Act an abatement notice may be served where smoke is judged to be causing a nuisance to neighbouring properties. Failure to comply with the requirements of such a notice can result in prosecution;

Under the Clean Air Act 1993 it is an offence for a commercial activity to burn anything that gives rise to dark smoke.

To prevent offences under the above named Acts there should be no bonfires on the site, to include the prohibition of the burning of cleared vegetation. The applicant should contact the Council's Planning & Regulatory Department on 01978 292 040 for further advice and information.

Abenbury Community Council

Comment 6 – Traffic generation, lack of lorry parking and associated harm

- 2.21 Abenbury Community Council (ACC) raises concern the proposal will generate additional traffic and distribution vehicles. In its view there is currently a great deal of vehicular congestion in this area and this will add to an already difficult situation faced by local residents. In particular that there are no lorry parking facilities within the industrial estate leading to problems of litter and human waste in open public spaces. This leads to health hazards for residents living on the Estate environs.

Comment 7 – Litter

- 2.22 ACC raises concern of a large amount of litter currently generated by the plant and that the extensions will mean more of such litter which is often wind-blown. ACC suggests that the extended premises should contain appropriate collection facilities for the recycling of the packaging / storage to prevent its escape from the site into the wider environs, and seeks better control across the plant.

3 RESPONSES MADE

- 3.1 Responses to the 7 comments are provided below.

Comment 1 – European Protected Species

- 3.2 NRW has requested that a Framework Strategy is prepared to support the planning application to set out how Great Crested Newts will be conserved both during and post construction. The Framework shall outline approaches in respect of GCN avoidance, mitigation, habitat provision and management, consideration of preventing incidental capture or killing, biodiversity and evidencing compliance with implementation of conservation proposals.
- 3.3 UES has been appointed by the applicant to prepare the Framework Strategy sought by NRW which will be submitted in support of the application. The applicant will abide by the recommendations of the Framework Strategy, including relevant planning conditions as part of any grant of permission to enable the issue of the relevant licence to enable development.
- 3.4 The applicant acknowledges the draft Condition 1 for a pre-commencement condition for an amphibian Conservation Plan, which it supports in principle, caveat only to whether the Framework Strategy may require amendment to the condition.

Comment 2 – Protected Sites

- 3.5 NRW's comment regarding SACs and phosphorus levels is noted, including its standing advice to local planning authorities.
- 3.6 The applicant maintains that the proposals as an employment use with no accommodation for overnight stays will not give rise to a material increase, and therefore no significant effect, on phosphorus being discharged from the site. The applicant will provide written justification to the local planning authority in support of its position.

Comment 3 – Land contamination

- 3.7 The applicant notes the proposed planning conditions and accepts imposition on any grant of permission in principle. It is noted that the local planning authority may have similar 'standard' conditions which it may impose in preference to NRW wording, but the principle remains.

Comment 4 – Flood risk

- 3.8 NRW's comment is noted that the development site is in Zone A.
- 3.9 The applicant will work with the LLFA through the planning application to agree a suitable surface water drainage solution.

Comment 5 – EHO conditions

- 3.10 The applicant notes the proposed EHO conditions and has no objection to the four conditions as set out on matters of a Dust Management Scheme, noise generation, construction working hours and burning of waste.
- 3.11 The applicant will prepare a Construction Environmental Management Plan (CEMP) as part of its development management which will likely incorporate the measures on dust suppression measures, construction working hours and practices including control on burning of waste.
- 3.12 At time of writing it is not anticipated the extensions will result in the need for additional air handling or other plant installation, but the approach to the protection of nearest noise sensitive premises is agreed in principle.

Comment 6 - Traffic generation, lack of lorry parking and associated harm

- 3.13 The comments of the Abenbury Community Council (ACC) relate to a wider concerns of the industrial estate and the uncontrolled parking of lorries within the estate and associated harm to the environment and health this brings.
- 3.14 The existing operation of Dragon Packaging has sufficient accommodation on site for HGV vehicles that service the site and as such is not considered to be contributing to the uncontrolled offsite parking referred to. The proposed development will also enlarge the service yard area and provide expanded internal storage space meaning that there will no longer be a need to use part of the service yard for external storage, often in parked trailers as can be seen currently. This will ensure there is adequate onsite space for HGV parking.

Comment 7 – Litter

- 3.15 ACC concerns on existing litter including uncontrolled wind blown litter has been passed back to Dragon Packaging as operator for it to undertake appropriate controls separate from any planning application considerations.



- 3.16 The planning application will assist long-term by providing expanded internal storage facilities which will remove the need for external storage. It is this external storage which is considered to be the reason for the problems in controlling packaging waste within the site. Appropriate recycling and waste storage will be provided for the expanded site as part of operational waste management.

4 CONSULTATION UNDERTAKEN

Consultation period

- 4.1 Formal consultation was undertaken for 28 days starting on 15th September 2022, ending on 13th October 2022.
- 4.2 Site notices were erected in English and Welsh languages at the site; letters had been sent to nearby residents and businesses; and emails and letters sent to specialist consultees. The details of those consulted is set out below and supported by information in Appendix 2.

Consultation details

- 4.3 The consultation consisted of the setting of a website¹ which provided by a series of 5 illustrated ‘boards’ and the draft planning pack as a series of PDF documents available to view online or download to view off line. A physical copy of the draft application documents, drawings and plans was provided for public viewing at the offices of F Lloyd (Penley) Ltd, Bridge Road, Wrexham Industrial Estate. Residents and businesses were advised of the availability to view the documents.
- 4.4 Copy of the notices are provided at Appendix 2.
- 4.5 Copy of the 5 illustrated ‘boards’ are reproduced at Appendix 2 (reduced scale).
- 4.6 The list of draft planning documents, drawings and plans comprising the consultation pack were:
- Drawings (all draft):
 - 1211-02-001 Rev P2 Existing Site Plan
 - 1211-02-002 Rev C Proposed Site Plan
 - 1211-05-000 Rev P1 Existing Elevations
 - 1211-05-001 Rev P1 Proposed Elevations
 - Documents (all draft):

¹ Website: <https://consultation.fi-rem.com/unit-47-48-wrexham-industrial-estate-consultation-page/>



- Design and Access Statement
- Planning Statement
- PAC Cover Letter & Notices in English & Welsh languages
- Waste Management Plan
- Preliminary Ecological Appraisal
- Arboricultural Impact Assessment
- Phase 1 Desk Study
- Flood Consequence Report
- Sustainable Urban Drainage Strategy
- Transport Statement

Residents

- 4.7 Residents were consulted at properties to the northwest / west / southwest of the site off Erlas Lane and Redwither Lane, with notices served in dual languages. All residents were offered the opportunity to view the drawings / documents in person at the offices of F Lloyd near to their homes as well as the website.
- 4.8 A list of the consulted homes is provided at Appendix 2.



Appendix 1

Consultation responses

Richard Purser
Director, Plan Red
richard@planred.co.uk

13/10/2022

Dear Mr Purser,

STATUTORY PRE-APPLICATION CONSULTATION - TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED.

BWRIAD / PROPOSAL: Erect two side extensions to existing industrial units, extend service yard, form new highway access (egress only) onto Clywedog Road South, landscaping and ancillary works

LLEOLIAD / LOCATION: Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate, LL13 9XN

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 15th September 2022.

We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding European Protected Species and Protected Sites. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.

We also advise that based on the information submitted to date, we would ask the planning authority to include conditions regarding European Protected Species and Land Contamination on any planning permission granted. Without the inclusion of these conditions by the planning authority we would be likely to object to the planning application.

European Protected Species

We have reviewed the submitted ecological report (reference Clark, E. (2021). Preliminary Ecological Appraisal: Dragon Packaging, 47- 48 Clywedog Road North Wrexham Industrial Estate, Wrexham LL13 9XN. United Environmental Services Ltd. (Unpublished Report No UES03537/01)

Great Crested Newt (GCN)

Section 3.3.1 states *“Due to the presence of a small amount of suitable terrestrial habitat which will be impacted on site, proximity to areas of suitable terrestrial habitat (dense scrub, dry ditch and scattered trees) and the relative proximity to known breeding populations, it is possible that GCNs and other common amphibians are present within the northern section of the site”*.

We consider that Wrexham Industrial Estate and its environs supports a nationally important population of great crested newt. This species and its breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and they classed as a material consideration for planning under the provisions of Technical Advice Note 5: Nature Conservation and Planning (TAN 5).

In our view, we consider that construction and operational phases of the proposal have the potential to adversely affect the great crested newt at this site. We therefore advise in support of any planning application, that you provide an overall framework strategy statement in respect of conserving great crested newt both during, and post construction. The Framework Strategy shall include outline approaches in respect of Great Crested Newt avoidance, mitigation, habitat provision and management, consideration of preventing incidental capture or killing (during and post construction); biosecurity and evidencing compliance with implementation of conservation proposals.

We would also advise the Local Planning Authority when consulted on any subsequent planning application, that they include a condition within any permission for an Amphibian Conservation Plan be submitted:

Condition 1 - No development shall commence until an amphibian Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan shall include, but not necessarily be limited to:

- (i) Build upon the principles outlined in the ecological report (Clark, E. (2021). Preliminary Ecological Appraisal: Dragon Packaging, 47- 48 Clywedog Road North Wrexham Industrial Estate, Wrexham LL13 9XN. United Environmental Services Ltd. (Unpublished Report No UES03537/01))
- (ii) Submission of details and associated plans concerning GCN avoidance and mitigation measures including, but not limited to: amphibian fence design, specifications and proposed locations; consideration of access issues across fence lines); fence monitoring and maintenance requirements; and supervised removal of barrier fences. Submission to include proposed timescales and reporting requirements
- (iii) Submission of further details concerning the provision of an amphibian conservation area. Details to include plans, extent, habitat creation and

enhancement proposals (ideally including pond construction) access, together with current and any proposed changes to tenure;

- (iv) Submission of a site management plan for the ecology area. Details to include
 - defined aims and objectives
 - habitat management prescriptions for aquatic and terrestrial habitats;
 - Detail of the skills and competencies required by those undertaking the works, surveillance or activities including whether they require European Protected Species licenses for the activities proposed;
 - provision for periodic review mechanism for the Environment Management Plan; and
 - current and proposed changes to tenure of the ecology area (freehold tenure of the defined ecology area to be approved by the discharging Authority in consultation with Natural Resources Wales) to ensure appropriate control over the land is established and the effective targeted delivery of long-term actions;
 - Monitoring and surveillance (25 years)
- (v) Submission of measures designed to prevent the accidental capture/killing of newts (amphibians) during the operational phase of the proposal. This is essentially the installation and maintenance of an amphibian friendly surface water management system that does not include gully pots (or other similar features);
- (viii) Ecological Compliance Audit, including key performance indicators
- (ix) Persons responsible for implementing the works
- (xi) Submission of a biosecurity risk assessment

The amphibian Conservation Plan shall be carried out in accordance with the approved details.

Justification: To ensure that an approved amphibian Conservation Plan is implemented, which protects amphibians affected by the development.

This advice applies to the proposal in its present form. If the plans are changed in ways that may affect GCN on this site, you would need a revised ecology report that takes account of such changes. Please consult us again if any updated or revised ecology report concludes that the proposal is more likely to have an adverse impact on the GCN population and/or alters the detail or implementation of mitigation or compensation measures.

Please also note that any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

We would also advise you separately, that the implementation of the proposed development is subject to regulation under the provisions of a derogation licence. NRW would refer the Local Authority to the Chief Planning Officer's letter dated 01 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Other European Protected Species

We concur with the assessment and conclusions in respect of hazel dormouse, water vole and otter.

Protected Sites

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. In line with our [Planning Advice](#) (July 2022), under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments. We therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

We note from the information submitted within sections 7.12 to 7.15 and 8.37 to 8.39 of the Planning Statement you believe that the development will not increase the amount of phosphorus being discharged from the site. Within any subsequent planning application, we would refer the Local Planning Authority to our Planning Advice, and ultimately it would be the view of the Local Planning Authority to determine whether there would be an increase to the amount of phosphorus being discharged from the site, as a result of the proposed development.

Provided this advice is followed and the Local Planning Authority are able to conclude that the development is not likely to have a significant effect on the SAC, we would have no objection to the proposal. However, should the Local Planning Authority conclude that the proposed development is likely to have a significant effect on the SAC, we would advise that the LPA consult us on their Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Land Contamination

We refer to the submitted Phase 1 Site Investigation Report, Integra Consulting, Ref: 3340-SI, Aug 2022 and would broadly agree with the recommendations. The report states within Table 2 that “much of the site appears to have been developed for the production of munitions associated with WWII. A mineral railway line runs along the NW border of the site, extending beyond the boundaries of the site”. We have land contamination concerns as there is the potential for historic contamination, and the site is of high sensitivity in terms of controlled waters. We therefore would ask the planning authority to also include the following conditions on any planning permission granted:

Condition 2– No development shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, has been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:
 - all previous uses

- potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
 3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
 4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

Justification: To ensure the risks associated with contamination at the site have been fully considered prior to commencement of development as controlled waters are of high environmental sensitivity; and where necessary remediation measures and long-term monitoring are implemented to prevent unacceptable risks from contamination

Condition 3 - Prior to the occupation of the development. a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

Justification:

To ensure the methods identified in the verification plan have been implemented and completed and the risk associated with the contamination at the site has been remediated prior to occupation or operation, to prevent both future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Condition 4 - If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Justification:

To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks. A site investigation may not uncover all instances of contamination and this condition ensures that contamination encountered during the development phase is dealt with appropriately.

Condition 5 - No development shall commence until details of piling or any other foundation designs using penetrative methods sufficient to demonstrate that there is no unacceptable risk to groundwater have been submitted to and approved in writing by the Local Planning Authority. The piling/foundation designs shall be implemented in accordance with the approved details.

Justification:

Piling/foundation details should be submitted to ensure there is no unacceptable risk to groundwater during construction and methods/design are agreed prior to the commencement of development or phase of development.

Condition 6 - No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Justification:

To prevent both new and existing development from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of water pollution.

Land Contamination advice to the applicant:

The treatment and disposal of contaminated soils and groundwater is regulated by waste legislation and requires an environmental permit.

Excavated materials that are recovered via a treatment operation can be re-used on-site under the [CL:AIRE Definition of Waste: Development Industry Code of Practice](#). This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterized both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, Natural Resources Wales should be contacted for advice at an early stage to avoid any delays

Natural Resources Wales recommends that developers should:

1. Follow the risk management framework provided in [Land contamination risk management \(LCRM\)](#)

2. Refer to '[Land Contamination: a guide for developers](#)' (WLGA, 2017) for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health
3. Refer to the [Environment Agency's \(2017\) 'Approach to Groundwater Protection'](#)

Flood Risk

The site lies within Zone A of the Development Advice Maps (DAM) contained within Technical Advice Note 15 Development and Flood Risk (July 2004).

TAN15 advises that for development located in Zone A the justification test is not applicable and surface water requirements apply. The acceptability criteria is for no increase in flooding elsewhere to occur as a result of the development. Given the location of development in Zone A, we advise that surface water requirements should be assessed. We note it is for the Local Planning Authority's Land Drainage Department to comment on the suitability of these proposals.

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

If you have any queries on the above, please do not hesitate to contact us.

Yours faithfully,

Gareth Thomas

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales

Richard Purser

From: Paul Campini <Paul.Campini@wrexham.gov.uk>
Sent: 22 September 2022 09:11
To: Richard Purser
Subject: RE: Pre-Application Consultation ("PAC") regarding proposed development at Dragon Packaging, Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Good morning Richard

I email in response to the above pre-planning consultation from Environmental Health at Wrexham Council.

Given that there is a mix of industrial units around the site and isolated residential properties to the north and west of the site, I would look to recommend the following conditions to the planning department should a full planning application be received:

- 1) No part of the development shall commence until an appropriate Dust Management Scheme has been submitted to and approved in writing by the Local Planning Authority. The dust mitigation measures as are approved shall be fully implemented for the entire duration of the construction phase.
- 2) The rating level of any noise generated by reason of this development, including from air handling plant, shall not exceed the pre-existing background level at any time. The noise levels shall be determined at nearby noise sensitive premises, and measurements and assessment shall be made in accordance with BS4142:2014 Methods for rating and assessing industrial and commercial sound.
- 3) All works in relation to the implementation of this permission, including deliveries to and /or leaving the site, should be undertaken only between the hours of 07.30 to 18.00 Monday to Friday, 08.00 to 14.00 on a Saturday, and at no time on a Sunday or a Bank Holiday. Outside these times, any works which are audible beyond the site boundary have the potential to cause unreasonable disturbance to neighbouring premises.

The applicant is advised that the Council has the option to control construction noise by serving a Control of Pollution Act 1974, Section 60 Notice where deemed necessary, and failure to comply with such a Notice can result in prosecution.

The applicant is further advised that any complaints received relating to noise of any type from the development may also be investigated using the Council's Standardised Procedure for Dealing with Noise Nuisance Complaints. This is done under the Statutory Nuisance provisions provided within the Environmental Protection Act 1990, and legal action may be taken where appropriate.

The applicant must adhere to the times given above wherever possible. If, however, there are urgent or unavoidable circumstances requiring work outside of the specified times, permission to proceed may be sought by contacting Environmental Health & Housing Standards at healthandhousing@wrexham.gov.uk or 01978 292 040. Please use the same contact details for any other enquiries regarding construction / demolition site noise.

- 4) Burning of waste generated from construction activities is not considered to be an appropriate method of disposal and action may be taken as follows:

Under the Environmental Protection Act 1990 anyone found disposing of construction site waste by burning is likely to be in breach of their duty of care with regard to waste disposal;

Under the same Act an abatement notice may be served where smoke is judged to be causing a nuisance to neighbouring properties. Failure to comply with the requirements of such a notice can result in prosecution;

Under the Clean Air Act 1993 it is an offence for a commercial activity to burn anything that gives rise to dark smoke.

To prevent offences under the above named Acts there should be no bonfires on the site, to include the prohibition of the burning of cleared vegetation. The applicant should contact the Council's Planning & Regulatory Department on 01978 292 040 for further advice and information.

Please don't hesitate to contact me should you wish to discuss the above.

Regards

Paul Campini

Swyddog Gorfodaeth / Enforcement Officer

Iechyd yr Amgylchedd a Safonau Tai / Environmental Health and Housing Standards



07800 688713

Cynllunio a Rheoleiddio, Guildhall, Wrexham, LL11 1AY | Planning and Regulatory, Guildhall, Wrexham, LL11 1AY

wreccsam.gov.uk | wrexham.gov.uk

twitter.com/cbcwreccsam | twitter.com/wrexhamcbc

facebook.com/cyngorwreccsam | facebook.com/wrexhamcouncil

From: Richard Purser <richard@planred.co.uk>

Sent: 15 September 2022 10:38

To: Matthew Phillips <Matthew.Phillips@wrexham.gov.uk>

Cc: Ellie Chew <echew@fi-rem.com>

Subject: Pre-Application Consultation ("PAC") regarding proposed development at Dragon Packaging, Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate

Matthew

Good morning. Please find our letter and notices relating to the proposed development.

This link, which should be good for 7 days, takes you to the documents and plans: <https://we.tl/t-hbuxFCDdCK>

Alternatively you can access the details online at: [Unit 47 & 48, Wrexham Industrial Estate Consultation Page – Botany Bay Business Park \(fi-rem.com\)](https://we.tl/t-hbuxFCDdCK)

The letter provides a summary of the proposals and details of how to make any comments.

Kind regards, Rich

Richard Purser

Director

Mobile: 07938 063301 | Email: richard@planred.co.uk

Richard Purser

From: Richard Purser <richard@planred.co.uk>
Sent: 12 October 2022 13:15
To: John Francis; Ellie Chew; Emily Armstrong
Subject: Fwd: Pre-Application Consultation ("PAC") regarding proposed development at Dragon Packaging, Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate

[EXTERNAL]

FYI

Richard Purser
Sent from my iPhone

Begin forwarded message:

From: Baxter Serena <abenburyclerk@gmail.com>
Date: 12 October 2022 at 06:39:02 GMT-5
To: Richard Purser <richard@planred.co.uk>
Subject: Re: Pre-Application Consultation ("PAC") regarding proposed development at Dragon Packaging, Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate

Hello Richard.

With regard to the Pre-Application Consultation ("PAC") regarding proposed development at Dragon Packaging, Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate. I can advise that Abenbury Community Council considered this at the meeting of the Council on the 10th of October 2022. The main concerns are :

That this will generate additional traffic and distribution vehicles. There is currently a great deal of vehicular congestion in this area. Additional delivery vehicles and waggon will add to the already difficult situation faced by residents living locally, namely that there remains no lorry parking facilities at the industrial estate, giving rise to problems of litter and human waste in open public spaces, and therefore a nuisance and health hazard to residents living on the Estate environs.

There are also concerns about the large amount of litter currently generated by the plant. Extension to the premises will mean more of such litter. This is often outside and blown about. Can the additional premises include collection facilities for recycling of the packaging so that it is stored in containers and not left to escape onto the industrial estate and wider environs. Can there be better control of this across the plant?

Regards
Serena

S Baxter
Clerk to Abenbury Community Council

Telephone **07470 602612**

Please note the Clerk's working week and availability is generally Monday and Tuesday. This may vary due to the demands of the service. If the Clerk is unavailable, please leave a message and they will get back to you as soon as possible.

Following the introduction of new General Data Protection Regulations (replacing the Data Protection Act from May 2018), this notice is to inform you that the information the Community Council holds about you will consist of information you have provided to us, which could include your name and address, together with your telephone number(s) and email address if you have provided them. This information will be used solely for the purpose of Abenbury Community Council communicating with you. The Council does not share this information with any other person or organisation and will hold it only for as long as it is needed. If you are content for this

situation to continue, you do not need to do anything further at the moment. If you wish the Council to delete your personal data, please let me know.

On Tue, 20 Sept 2022 at 10:25, Richard Purser <richard@planred.co.uk> wrote:

Serena

Thank you for the email. The formal period of consultation runs to 13th October for PAC so that should work for your meeting timing. And in any case even if you sent over comments a few days after this date it will still be picked up as so please don't feel everything must be tied up immediately.

I look forward to hearing from you

Regards, Rich



Richard Purser
Director
Mobile : 07938 063301

From: Baxter Serena <abenburyclerk@gmail.com>
Sent: 20 September 2022 10:11
To: Richard Purser <richard@planred.co.uk>
Subject: Re: Pre-Application Consultation ("PAC") regarding proposed development at Dragon Packaging, Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate

Thank you for your email Richard. I will advise Community Councillors. However the next meeting of the Community Council is not until the 10th October. Will you be prepared to accept any comments at that time?

Regards

S Baxter

Clerk to Abenbury Community Council

Telephone **07470 602612**



APPENDIX 2

Consultation letters and notices issued

**PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
NOTICE UNDER ARTICLES 2C AND 2D**

(to be served on owners and/or occupiers of adjoining land and community consultees; and displayed by site notice on or near the location of the proposed development)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority (“LPA”). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at (a) **Units 47 & 48 “Dragon Packaging”, Clywedog Road North, Wrexham Industrial Estate, LL13 9XN**

I give notice that (b) FI Real Estate Management Ltd

Is intending to apply for planning permission to (c): **Erect two side extensions to existing industrial units, extend service yard, form new highway access (egress only) onto Clywedog Road South, landscaping and ancillary works**

You may inspect copies of:

the proposed application;
the plans; and
other supporting documents

online at (d) <https://consultation.fi-rem.com/unit-47-48-wrexham-industrial-estate-consultation-page/> and computer facilities are available to view this information online at (e) **Wrexham Library, Rhosddu Road, Wrexham LL11 1AU** between the hours of (f) **9am – 6pm (Mon-Fri) and 9am – 4pm (Sat), closed Sundays and Bank Holidays**

(or)

You may view this information at (g) **F Lloyd Penley (Bottom Site Office Reception), Bridge Road, Wrexham Industrial Estate, LL13 9SQ** between the hours of (h) **10am -3pm (Mon – Fri only)**

Anyone who wished to make representations about proposed development must write to the applicant / agent at (i) **enquiries@fi-rem.com** (please put “Dragon Packaging” in the subject line) or (j) **“Dragon Packaging Consultation”, FI Real Estate Management Ltd, Canal Mill, Botany Bay, Chorley, Lancashire PR6 9AF**

by (k)**13th October 2022**

Signed: **Richard Purser**

Date: ...**15 September 2022**

Insert:

- | | |
|--|---|
| a) address or location of development | f) insert opening hours of relevant building at (e) |
| b) applicant's name | g) insert address of relevant building |
| c) description of the proposed development | h) insert opening hours of relevant building at (g) |
| d) address of website | i) email address of the applicant /agent |
| e) insert address of relevant building | j) address of the applicant |
| k) date giving period of 28 days, beginning with the date of service and publication | |

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO
HYSBYSIAD DAN ERTHYGLAU 2C A 2D

(i'w gyflwyno i berchnogion a/neu feddianwyr tir cyfagos ac ymgylgoreion cymunedol; a'i arddangos trwy hysbysiad safle ar leoliad y datblygiad arfaethedig neu gerllaw iddo)

Pwrpas yr hysbysiad hwn: mae'r hysbysiad hwn yn rhoi'r cyfle i wneud sylwadau'n uniongyrchol i'r datblygwr ar ddatblygiad arfaethedig cyn cyflwyno cais cynllunio i'r awdurdod cynllunio lleol ("ACLI"). Bydd unrhyw gais cynllunio dilynol yn cael ei gyhoeddi gan yr ACLI perthnasol; ni fydd unrhyw sylwadau a ddarperir mewn ymateb i'r hysbysiad hwn yn rhagfarnu eich gallu i gyflwyno sylwadau i'r ACLI ar unrhyw gais cynllunio cysylltiedig. Dylech nodi y gall unrhyw sylwadau a gyflwynir gael eu gosod yn y ffeil gyhoeddus.

Datblygiad arfaethedig yn (a) **Unedau 47 a 48 "Dragon Packaging", Gogledd Ffordd Clywedog, Stad Ddiwydiannol Wrecsam, LL13 9XN**

Rhoddaf hysbysiad hynny (b) FI Real Estate Management Ltd

Yn bwriadu gwneud cais am ganiatâd cynllunio i (c): **Codi dwy estyniad ochr i unedau diwydiannol presennol, ymestyn iard wasanaeth, ffurfio mynedfa briffordd newydd (allanfa yn unig) i Ffordd De Clywedog, tirlunio a gwaith atodol**

Gallwch archwilio copïau o:

y cais arfaethedig;
y cynlluniau; a
dogfennau ategol eraill

ar-lein yn (d) <https://consultation.fi-rem.com/unit-47-48-wrexham-industrial-estate-consultation-page/> ac mae cyfleusterau cyfrifiadurol ar gael i weld y wybodaeth hon ar-lein yn (e) **Llyfrgell Wrecsam, Ffordd Rhosddu, Wrecsam LL11 1AU** rhwng yr oriau o (f) **9am – 6pm (Llun-Gwener) a 9am – 4pm (Sadwrn)**, ar gau ar ddydd Sul a Gwyliau Banc

(or)

Gallwch weld y wybodaeth hon yn (g) **F Lloyd Penley (Derbynfa Swyddfa'r Safle Gwaelod), Bridge Road, Ystâd Ddiwydiannol Wrecsam, LL13 9SQ** rhwng yr oriau o (h) **10am -3pm (Llun - Gwener yn unig)**

Rhaid i unrhyw un sy'n dymuno gwneud sylwadau am ddatblygiad arfaethedig ysgrifennu at yr ymgeisydd / asiant yn (i) **enquiries@fi-rem.com** (rhowch **"Dragon Packaging"** yn y llinell bwnc) (j) **"Dragon Packaging Consultation", FI Real Estate Management Ltd, Canal Mill, Botany Bay, Chorley, Lancashire PR6 9AF**

gan (k)**13 Hydref 2022**

Llofnodwyd: **Richard Purser**

Dyddiad: ...**15 Medi 2022**

Mewnosod:

- | | |
|---|---|
| a) cyfeiriad neu leoliad y datblygiad | i) cyfeiriad e-bost yr ymgeisydd/asiant |
| b) enw'r ymgeisydd | j) cyfeiriad yr ymgeisydd |
| c) disgrifiad o'r datblygiad arfaethedig | k) dyddiad rhoi cyfnod o 28 diwrnod, gan ddechrau gyda'r dyddiad cyflwyno a chyhoeddi |
| d) cyfeiriad y wefan | |
| e) rhowch gyfeiriad yr adeilad perthnasol | |
| f) mewnosod oriau agor yr adeilad perthnasol yn (e) | |
| g) mewnosod cyfeiriad yr adeilad perthnasol | |
| h) mewnosod oriau agor yr adeilad perthnasol yn (g) | |

Example letter for PAC Website

Dear Sir or Madam

Pre Application Consultation ('PAC') for a Proposed Planning Application to extend Units 47 & 48 "Dragon Packaging", Clywedog Road North, Wrexham LL13 9XN

We are writing to you on behalf of FI Real Estate Management Ltd ("FIREM") in connection with a planning application it proposes to make on behalf of Dragon Packaging Ltd to extend its premises at Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate.

This letter is being sent to you in accordance with the *Town and Country Planning Act 1990, Section 61Z* and provisions of the *Town and Country Planning (Development Management Procedure) (Wales) Order 2012* and related guidance in *New Development Management Procedures 2016*. In summary the regulations require all applicants proposing development that will create in excess of 1,000 m² floorspace, as is the case here, to notify surrounding properties and occupiers of its intention to make the planning application, making available copies of draft plans and documents for review and to submit comments upon before it formally makes a planning application.

Enclosed with this letter is formal notice under Articles 2C and 2D in English and Welsh requesting your response within 28 days. Details of how to respond are provided at the end of this letter and on the notice.

This letter therefore provides formal notice of this pre-application consultation, provides background to what is proposed and the reasons for making the application, and provides you with details on how you can view the draft application drawings and documents and make any comments.

Background

Plan Red Ltd is a planning consultancy and we are instructed by FIREM to prepare and submit its planning application for extension of the existing premises, Units 47 & 48 Clywedog Road North. Those units are owned by FIREM but are leased to Dragon Packaging Ltd which operates from the premises.

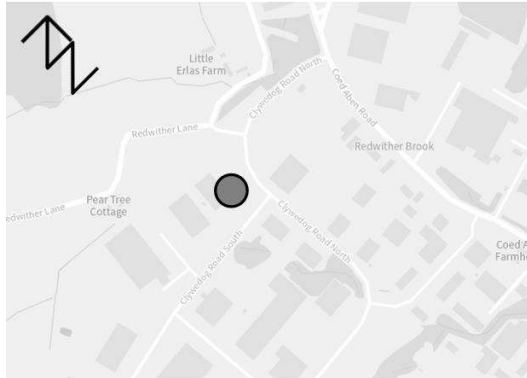
FIREM owns, operates and manages a diverse property portfolio across the UK including a significant commercial portfolio that includes a number of existing premises and sites within Wrexham Industrial Estate. Its guiding principle is that every property related intervention and action should be an opportunity to create better quality floorspace and buildings that generate improved value. 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. It is in this spirit that it is working with its tenant, Dragon Packaging, to invest in the premises and support its business expansion objectives.

Dragon Packaging Limited was founded in 2002. The company provides thermoformed packaging solutions for both food and non-food manufacturers, such as cosmetics and gift industries. The company provides a diverse range of packing in a small or large production runs from its facility at Wrexham Industrial Estate. The company currently employs 48 people at its site which operates as a combined manufacturing and storage / distribution

depot for thermopackaging. Dragon Packaging plans to diversify and expand its markets and customer base. To do so it requires and is seeking through this application to expand its storage and distribute capacity for completed product at the site.

Development proposals

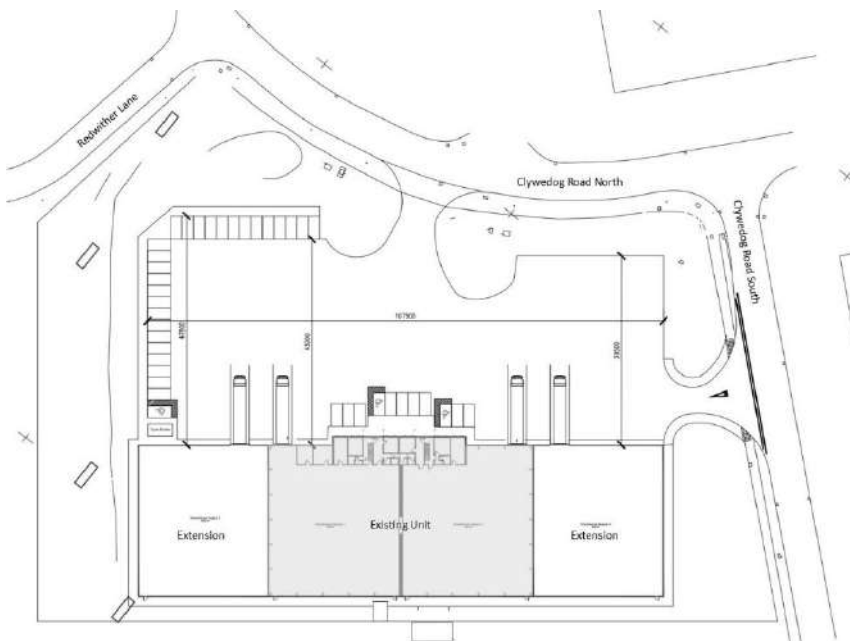
To assist the application site is located in the plan extract below:



In summary the proposals will seek to:

- Erect two extensions to either side of the existing units to approximately double the scale of the unit (currently 1,959 m² and as extended 3,655 m² – the two extensions being 848 m² each side)
- Extensions will be to a modern industrial unit appearance and the existing units, with exception of the brick office building to front, will be reclad to match
- Extend the forecourt / service yard area to match the width of the extended unit and reconfigure the parking area
- Provide an addition exit onto Clywedog Road South of the southeast side of the extended service yard to help movement of goods vehicles within the site and onto the road network
- Provide replacement tree planting for those lost to accommodate the extension and service yard
- Provide additional drainage attenuation (storage tanks below service yard) to handle surface water runoff following sustainable urban drainage best practice

The proposed extended premises and service yard and new egress only onto Clywedog Road South is illustrated below (extract of drawing Proposed Site Plan 1211 02-002 Rev C with annotation):



Full drawing details are available to download and view including proposed elevations of the extension. Details follow at the end of the letter of how.

Planning case

Part of the application includes the draft Planning Statement which sets out the planning policy background at national and local level and our view of how the proposal respond to policy considerations. It is our firm conclusion that the proposed development is appropriate within the existing Wrexham Industrial Estate which is allocated for such uses and policies lend support to investment by businesses to benefit employment and the local economy. In other matters of transport, landscape, ecology and drainage we find the proposals accord with policy objectives in a balanced and proportionate manner. This finding is supported by relevant documents and details which are listed below in the application package.

Our full draft planning case is set out within the Planning Statement to read.

Application package

The draft planning application package is formed of a series of drawings and documents prepared in accordance with the Council's validation checklist. Should the Council direct through this process that additional evidence is required this will be picked up in the future, formal application submission.

- Draft Planning Application Forms
- Drawing pack – including Site Location Plan, Proposed Site Plan, Elevations and Floorplans
- Design and Access Statement
- Planning Statement
- Transport Statement
- Flood Consequence Assessment
- Sustainable Urban Drainage Strategy
- Arboricultural Impact Assessment & Method Statement
- Phase 1 Site Investigation Report
- Preliminary Ecological Appraisal
- Waste Management Plan

How to View and Comment on the Draft Planning Application Package

An online exhibition depicting and describing the proposed development with all plans and documents listed above can be found on the following weblink:

<https://consultation.fi-rem.com/unit-47-48-wrexham-industrial-estate-consultation-page/>

You can download all plans and documents as PDFs for offline viewing.

Comments on the proposals can be made either by email or by letter. We are sorry but we are currently unable to provide an online comment form, though an email link is provided on the webpage.

- By email to: enquiries@fi-rem.com (please put “Dragon Packaging” in the subject line)
- By letter to: “Dragon Packaging Consultation,” FI Real Estate Management Ltd, Canal Mill, Botany Bay, Chorley, Lancashire PR6 9AF

Should you wish to discuss the proposed development you can contact Ellie Chew (FIREM) on 01257 448010 or Richard Purser (Plan Red) 07938 063301.

How your comments will be used

We can confirm that any comments received will be treated as confidential for view and use by FIREM, Plan Red and the Council. All comments will be set out in a “Pre-Application Consultation Report” to be submitted alongside the final submission, but no names or identifying contact details will be provided.

Yours faithfully,

Richard Purser, Director

Plan Red Ltd

Development Control Advisor
North Planning
National Resources Wales

northplanning@cyfoethnaturiolcymru.gov.uk

By email only

Dear Sir or Madam

Pre Application Consultation ('PAC') for a Proposed Planning Application to extend Units 47 & 48 "Dragon Packaging", Clywedog Road North, Wrexham LL13 9XN

We are writing to you on behalf of FI Real Estate Management Ltd ("FIREM") in connection with a planning application it proposes to make on behalf of Dragon Packaging Ltd to extend its premises at Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate.

The application proposes to:

Erect extensions to industrial unit (combined floorspace 1,696 sqm), construct second means of access, reconfigured service yard and parking, landscaping and ancillary works

This letter encloses formal notice under Article 2D in English and Welsh requesting your consultation response within 28 days, i.e. by 13th October 2022. Details to reply are provided at the end of the letter.

An online exhibition depicting and describing the proposed development with all plans and documents listed above can be found on the following weblink:

<https://consultation.fi-rem.com/unit-47-48-wrexham-industrial-estate-consultation-page/>

You can download all plans and documents as PDFs for offline viewing. A WeTransfer link will also be provided in the email sent to you. Because these expire after 7 days please contact info@planred.co.uk for a replacement link.

Pre-application consultation ("PAC") is a requirement for all major developments in Wales, in this case a development over 1,000 sqm in floorspace, as set out in the *Town and Country Planning Act 1990, Section 61Z* and provisions of the *Town and Country Planning (Development Management Procedure) (Wales) Order 2012, Part 1A* and related guidance in *New Development Management Procedures 2016*.

Background

Plan Red Ltd is a planning consultancy and we are instructed by FIREM to prepare and submit its planning application for extension of the existing premises, Units 47 & 48 Clywedog Road North. Those units are owned by FIREM but are leased to Dragon Packaging Ltd which operates from the premises.

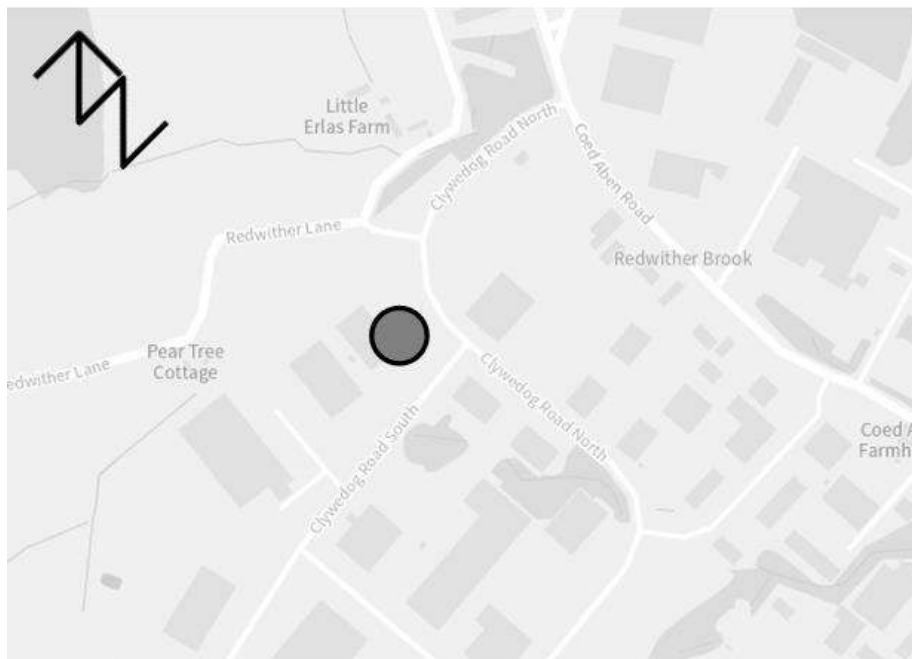
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Development proposals

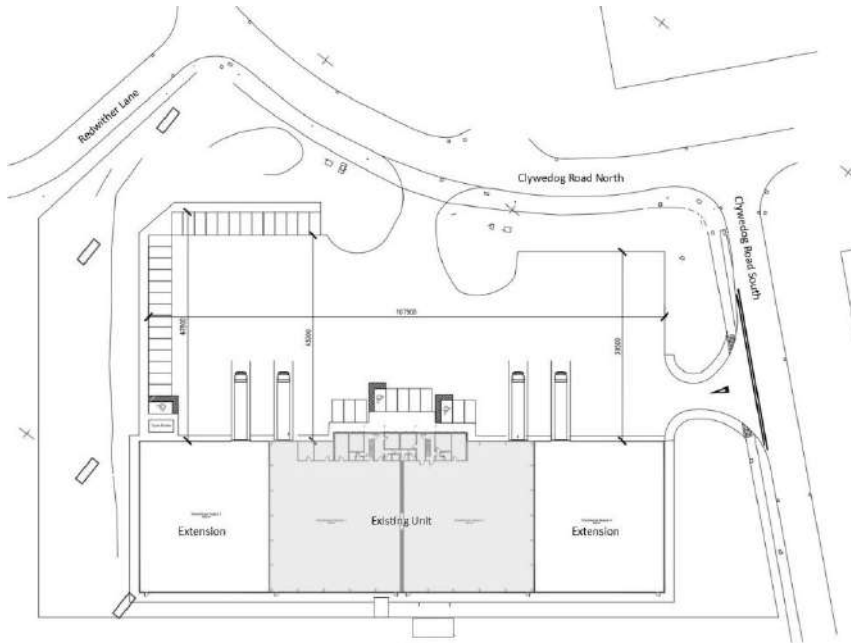
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Full drawing details are available to download and view including proposed elevations of the extension. Details follow at the end of the letter of how.

Planning case

Part of the application includes the draft Planning Statement which sets out the planning policy background at national and local level and our view of how the proposal respond to policy considerations. It is our firm conclusion that the proposed development is appropriate within the existing Wrexham Industrial Estate which is allocated for such uses and policies lend support to investment by businesses to benefit employment and the local economy. In other matters of transport, landscape, ecology and drainage we find the proposals accord with policy objectives in a balanced and proportionate manner. This finding is supported by relevant documents and details which are listed below in the application package.

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- Planning Statement
- Transport Statement
- Sustainable Urban Drainage Strategy
- Flood Consequence Assessment
- Arboricultural Impact Assessment & Method Statement
- Phase 1 Site Investigation Report
- Preliminary Ecological Appraisal
- Waste Management Plan

Making Comments

Comments are invited by email or letter:

- By email to: richard@planred.co.uk (please put “Dragon Packaging” in the subject line)
- By letter to: Plan Red (Dragon Packaging consultation), 11th Floor, 3 Piccadilly Place, Manchester M1 3BN

Should you wish to discuss the proposed development you can contact Ellie Chew (FIREM) on 01257 448010 or Richard Purser (Plan Red) 07938 063301.

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Yours faithfully,

A handwritten signature in black ink, appearing to read 'R Purser', with a horizontal line drawn underneath it.

Richard Purser, Director
Plan Red Ltd

Development Control Officer (PAC Consultation)
Wales & West Utilities
Spooner Close
Celtic Springs
Coedkernew
NEWPORT
NP10 8EZ

Dear Sir or Madam

Pre Application Consultation ('PAC') for a Proposed Planning Application to extend Units 47 & 48 "Dragon Packaging", Clywedog Road North, Wrexham LL13 9XN

We are writing to you on behalf of FI Real Estate Management Ltd ("FIREM") in connection with a planning application it proposes to make on behalf of Dragon Packaging Ltd to extend its premises at Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate.

The application proposes to:

Erect extensions to industrial unit (combined floorspace 1,696 sqm), construct second means of access, reconfigured service yard and parking, landscaping and ancillary works

This letter encloses formal notice under Article 2D in English and Welsh requesting your consultation response within 28 days, i.e. by 13th October 2022. Details to reply are provided at the end of the letter.

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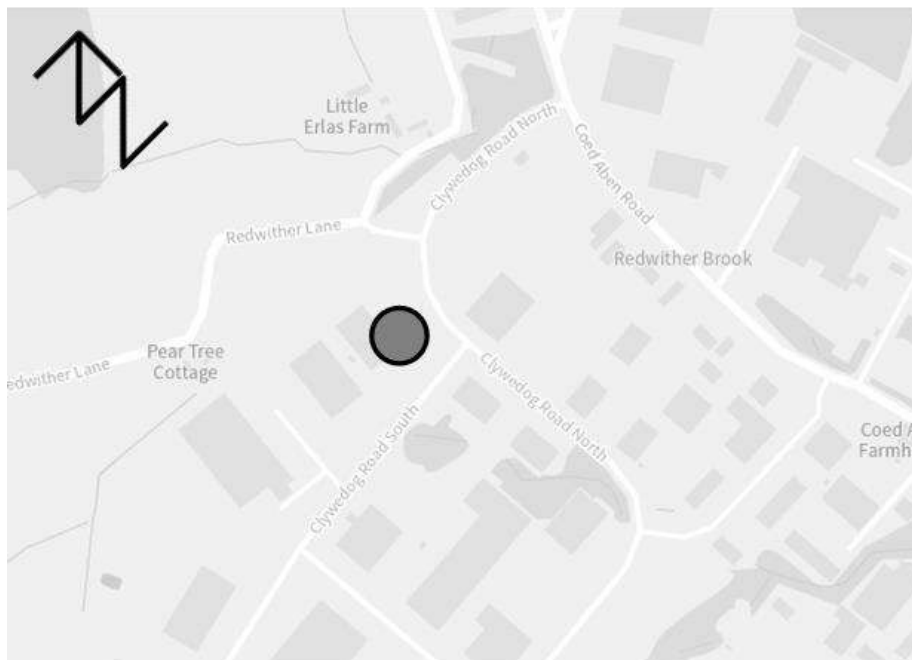
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Dragon Packaging Limited was founded in 2002. The company provides thermoformed packaging solutions for both food and non-food manufacturers, such as cosmetics and gift industries. The company provides a diverse range of packing in a small or large production runs from its facility at Wrexham Industrial Estate. The company currently employs 48 people at its site which operates as a combined manufacturing and storage / distribution depot for thermopackaging. Dragon Packaging plans to diversify and expand its markets and customer base. To do so it requires and is seeking through this application to expand its storage and distribute capacity for completed product at the site.

Development proposals

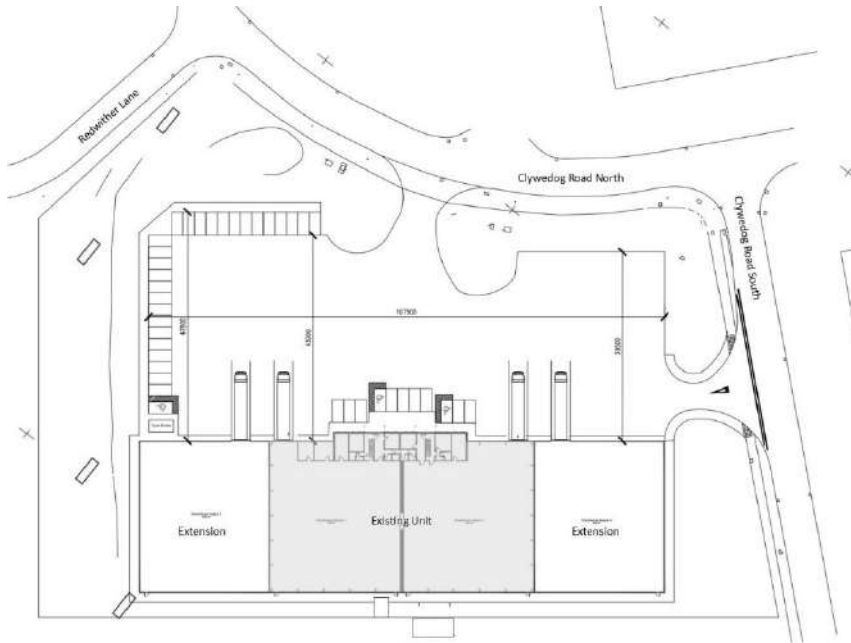
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In summary the proposals will seek to:

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The proposed extended premises and service yard and new egress only onto Clywedog Road South is illustrated below (extract of drawing Proposed Site Plan 1211 02-002 Rev C with annotation):



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Planning case

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Development Control Officer
Developer Services
Welsh Water

Developer.services@dwrcymru.com

By email only

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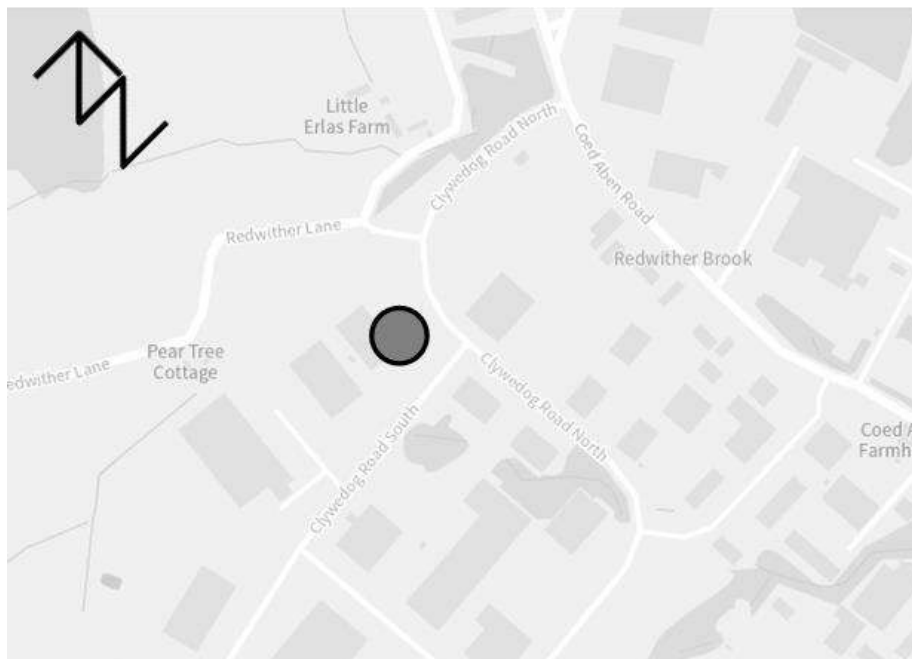
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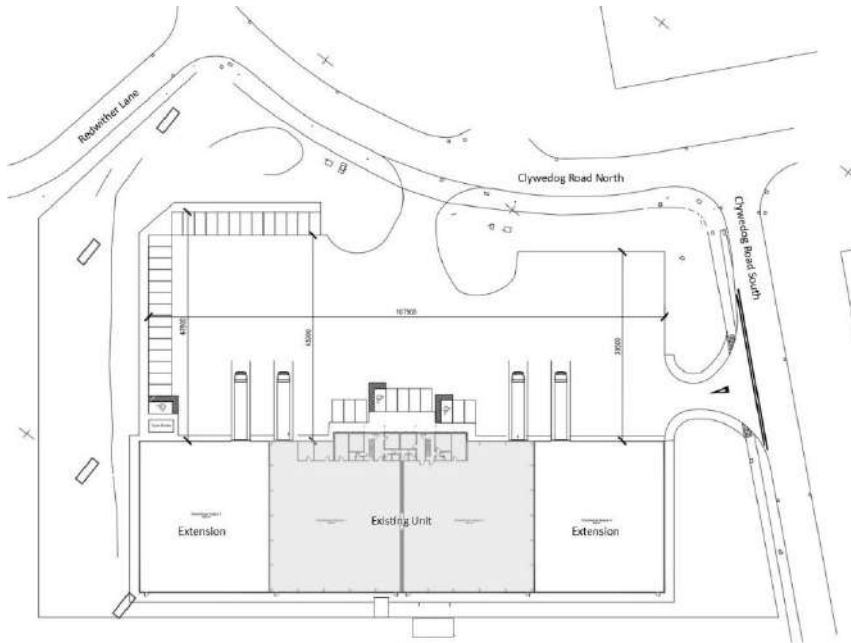
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Richard Purser, Director
Plan Red Ltd

Ms S Baxter
Clerk to Abenbury Community Council
19 Macella Close
Marchweil
Wrexham

clerk@abenburycommunitycouncil.org.uk

By email only

Dear Ms Baxter

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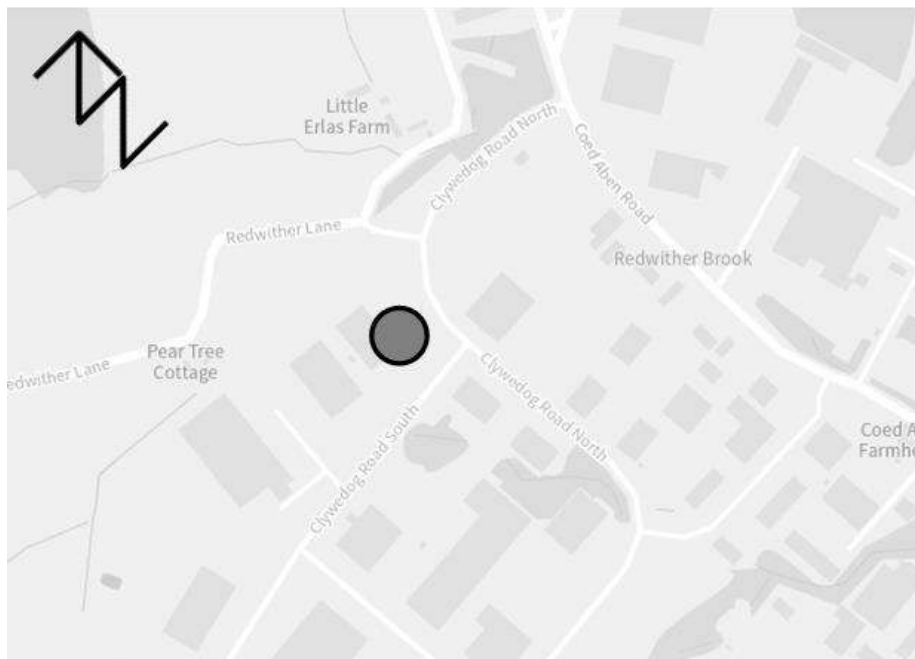
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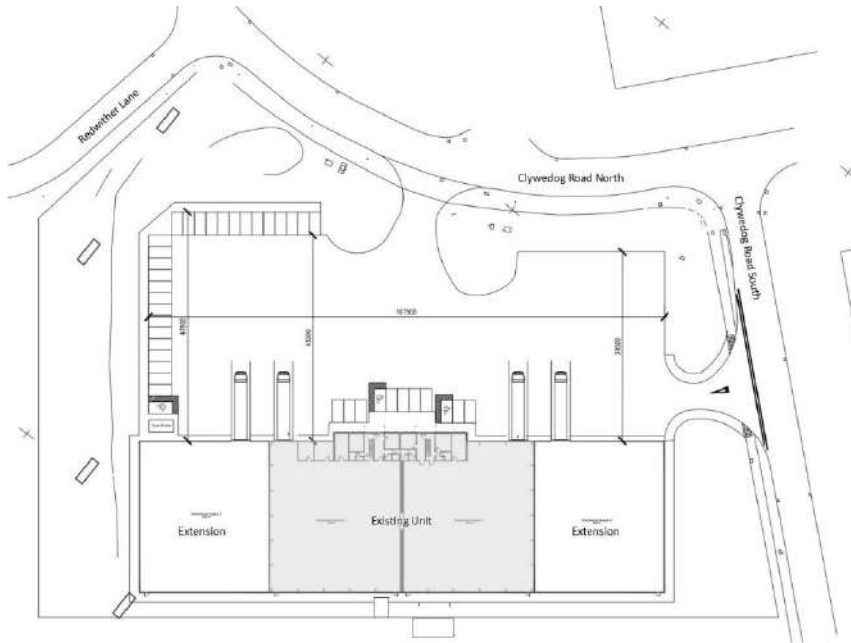
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Plan Red Ltd

Cllr MG Morris
Wrexham County Borough Council (Holt Ward)

Michael.morris@wrexham.gov.uk
By email only

Dear Cllr Morris

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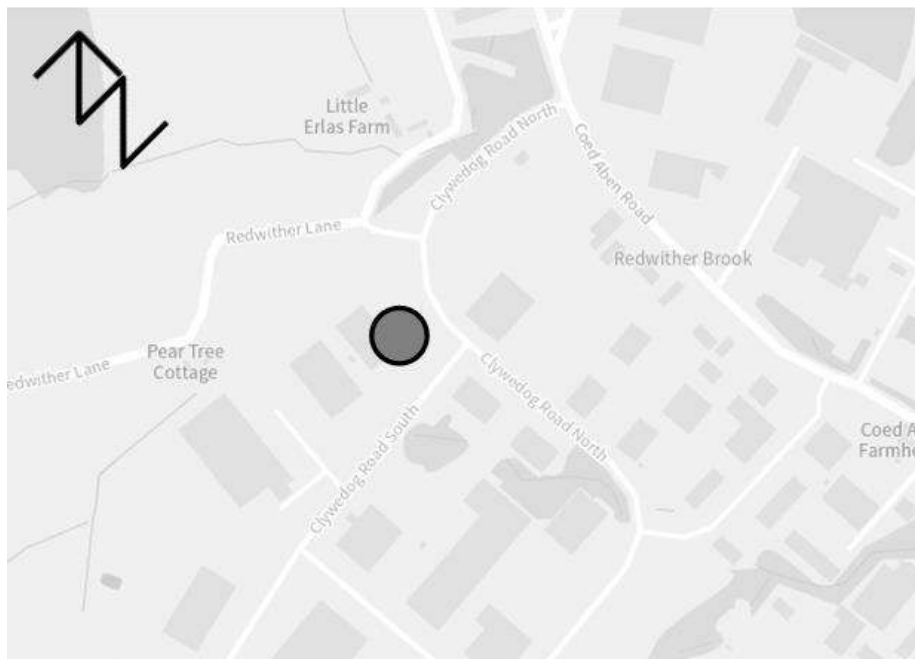
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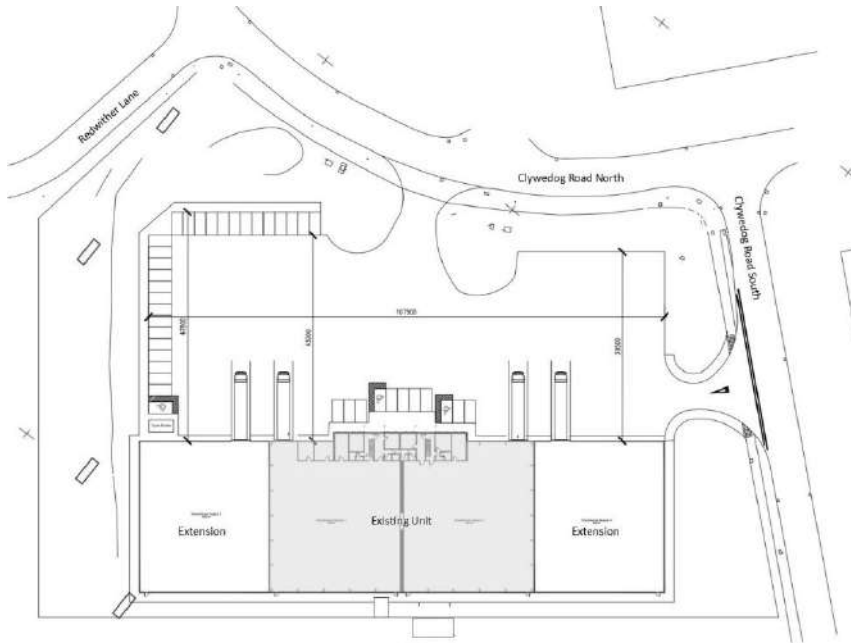
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Richard Purser, Director
Plan Red Ltd

Richard Purser

From: Richard Purser
Sent: 15 September 2022 10:38
To: Matthew Phillips
Cc: Ellie Chew
Subject: Pre-Application Consultation ("PAC") regarding proposed development at Dragon Packaging, Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate
Attachments: 220915 PAC Letter WCBC Dragon Packaging.pdf; 220915 PAC Article 2D specialist consultees (ENG) notice Dragon Packaging.pdf; 220915 PAC Article 2D specialist consultees WELSH notice Dragon Packaging.pdf

Matthew

Good morning. Please find our letter and notices relating to the proposed development.

This link, which should be good for 7 days, takes you to the documents and plans: <https://we.tl/t-hbuxFCDdCK>

Alternatively you can access the details online at: [Unit 47 & 48, Wrexham Industrial Estate Consultation Page – Botany Bay Business Park \(fi-rem.com\)](https://www.botanybaybusinesspark.co.uk/consultation)

The letter provides a summary of the proposals and details of how to make any comments.

Kind regards, Rich

Richard Purser

Director

Mobile: 07938 063301 | Email: richard@planred.co.uk



11th Floor,
3 Piccadilly Place
Manchester
M1 3BN

This message and any attachment(s) are confidential and may be privileged or otherwise protected from disclosure. If you are not the intended recipient please telephone or email the sender and delete this message and any attachment(s) from your system. If you are not the intended recipient you must not copy this message or disclose the contents to any other person.

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Richard Purser

From: Richard Purser
Sent: 15 September 2022 10:37
To: developer.services@dwrcymru.com
Subject: Pre-Application Consultation ("PAC") regarding proposed development at Dragon Packaging, Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate
Attachments: 220915 PAC Article 2D specialist consultees (ENG) notice Dragon Packaging.pdf;
220915 PAC Article 2D specialist consultees WELSH notice Dragon Packaging.pdf;
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Warning: Whilst we believe this email and any attachment are free of any virus or other defect which might affect your system it is your responsibility to ensure that this is so. We accept no liability for any loss or damage caused in any way by its receipt or use.

Richard Purser

From: Richard Purser
Sent: 15 September 2022 10:36
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Dear Sir / Madan

Please find our letter and notices relating to the proposed development.

This link, which should be good for 7 days, takes you to the documents and plans: <https://we.tl/t-hbuxFCDdCK>

Alternatively you can access the details online at: [Unit 47 & 48, Wrexham Industrial Estate Consultation Page – Botany Bay Business Park \(fi-rem.com\)](https://www.botanybaybusinesspark.co.uk/consultation)

The letter provides a summary of the proposals and details of how to make any comments.

Kind regards,

Richard Purser

Director

Mobile: 07938 063301 | Email: richard@planred.co.uk



11th Floor,
3 Piccadilly Place
Manchester
M1 3BN

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Richard Purser

From: Richard Purser
Sent: 15 September 2022 10:35
To: michael.morris@wrexham.gov.uk
Subject: Pre-Application Consultation ("PAC") regarding proposed development at Dragon Packaging, Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate
Attachments: 220915 PAC Article 2D specialist consultees (ENG) notice Dragon Packaging.pdf;
220915 PAC Article 2D specialist consultees WELSH notice Dragon Packaging.pdf;
220915 PAC Letter Cllr Morris Dragon Packaging.pdf

Dear Cllr Morris

Please find our letter and notices relating to the proposed development.

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Alternatively you can access the details online at: [Unit 47 & 48, Wrexham Industrial Estate Consultation Page – Botany Bay Business Park \(fi-rem.com\)](https://www.wrexham.gov.uk/consultation/unit-47-48-wrexham-industrial-estate)

The letter provides a summary of the proposals and details of how to make any comments.

Your sincerely, Rich

Richard Purser

Director

Mobile: 07938 063301 | Email: richard@planred.co.uk



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Richard Purser

From: Richard Purser
Sent: 15 September 2022 10:34
To: clerk@abenburycommunitycouncil.org.uk
Subject: Pre-Application Consultation ("PAC") regarding proposed development at Dragon Packaging, Units 47 & 48 Clywedog Road North, Wrexham Industrial Estate
Attachments: 220915 PAC Letter Abenbury CC Dragon Packaging.pdf; 220915 PAC Article 2D specialist consultees (ENG) notice Dragon Packaging.pdf; 220915 PAC Article 2D specialist consultees WELSH notice Dragon Packaging.pdf

Dear Ms Baxter

Please find our letter and notices relating to the proposed development.

This link, which should be good for 7 days, takes you to the documents and plans: <https://we.tl/t-hbuxFCDdCK>

Alternatively you can access the details online at: [Unit 47 & 48, Wrexham Industrial Estate Consultation Page – Botany Bay Business Park \(fi-rem.com\)](https://www.botanybaybusinesspark.co.uk/consultation)

The letter provides a summary of the proposals and details of how to make any comments.

Yours sincerely, Rich

Richard Purser

Director

Mobile: 07938 063301 | Email: richard@planred.co.uk



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3 Piccadilly Place
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