Planning Design and Access Statement (PDAS)

Project Aurora

Kellogg Company of Great Britain Limited

Orange Tower – Media City, UK, Salford, Greater Manchester, M50 2HF

Prepared by:

SLR Consulting Limited

3rd Floor, Brew House, Jacob Street, Tower Hill,
Bristol, BS2 0EQ

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Basis of Report

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1.0 Introduction

This Planning, Design, and Access Statement (PDAS) has been prepared by SLR Consulting Limited (SLR) on behalf of Kellogg Company of Great Britain Limited ('the Applicant') in support of a Planning Application being made to Wrexham County Borough Council (WCBC) to gain consent for the installation of plant, machinery, ducting, extracts and flues on the main building and the expansion of the effluent treatment plant at Kellogg's Wrexham manufacturing site, situated at Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT.

The proposed development will support the increase in production at the site. Further information regarding the development proposals is provided within Section 3 of this report, whilst the content of the planning application submission is detailed within Section 1.3 below.

1.1 The Applicant and Landownership

1.1.1 Landownership and the Applicant

Kellogg Company of GB Limited is a subsidiary of Kellanova that is responsible for the company's UK-based operations associated with Kellogg's brand, including manufacturing at the Wrexham site. Kellogg Company of GB Limited is the freehold landowner and the Applicant for this application.

1.1.1 Kellanova

Kellanova (formerly Kellogg Company) is a cereal business home to brands including Kellogg's Froot Loops and Rice Krispies, after company founder W.K. Kellogg, who created Corn Flakes in 1894. They are an American multinational food manufacturing company headquartered in Battle Creek, Michigan, United States. Kellanova produces cereal and convenience foods, including crackers and toaster pastries, and markets its products with several well-known brands, as previously mentioned.

Following on from the opening of the first UK Kellogg's factory (Trafford Park, Manchester) in 1938, Kellogg's opened its second UK factory in Wrexham, North Wales. The site was officially opened by HRH Princess Alexandra on 28th April 1978.

1.1.2 SLR Consulting Limited

Established in July 1994, SLR is a leading international environmental consultancy with an unrivalled reputation for providing expert, tailored services. With more than 100 offices across Europe, North America, Asia Pacific, and Africa, SLR is one of a very small number of truly international specialists providing advice and support on a wide range of strategic and site-specific issues, to a diverse and growing base of business, regulatory and governmental clients.

SLR specialises in the built environment, financial services, industry, infrastructure, mining & minerals, oil & gas and power sectors, delivering expert sustainability advice and project management support across these sectors.

SLR provides multidisciplinary advice, to both public and private sector clients, from in-house experts on a wide range of strategic and site-specific environmental and sustainability issues. SLR is nearly 3000 strong Worldwide spread throughout more than 100 Offices.

SLR is also recognised by the Institute of Environmental Management and Assessment ('IEMA') as a recommended consultancy to review Environmental Statements ('ES') for Environmental Impact Assessments ('EIA'). Further information on SLR can be found on its website: www.slrconsulting.com

1.2 Reason for Application

With the closure of its Trafford Park manufacturing site in Manchester in 2026, Kellanova are proposing to move all production to its Wrexham manufacturing site. As well as moving the operations this will also require the expansion of the existing production at the Wrexham site.

As a result of this move, the expansion of the production lines at the Wrexham factory is required. This will involve the dismantling of process and packing equipment, demolishing internal partitions and MEP installations, refurbishment of several areas, construction of a new Allergen area (which also involves new lockers and a new conditioned area for storage of Raw Materials) and installation of new process/packing equipment for the new production lines.

Further to this, to support the expansion of the new production lines and internal works (that do not require planning permission); the proposed works will require the installation of additional plant and machinery on the roof of the main factory and the expansion of the existing effluent treatment plant on site to accommodate the increase of work on site. Further information regarding the proposal outlined above is provided within the description of the development section of this PDAS (Section 3.0).

1.3 Content of Planning Application

This planning submission to WCBC comprises the following technical information and documents:

- Planning, Design, and Access Statement *(this document)*;
- Planning Application Forms and Certificates;
- Application Drawings, including:
    - Site Location Plan- Drawing No.000001, Rev 00, Scale 1:2500 @ A2;
    - Existing Site Layout Plan- Drawing No.000002, Rev 00, Scale 1:750 @ A0;
    - Existing Elevations Plan- Drawing No.001011, Rev 00, Scale 1:350 @ A0;
    - Existing Roof Layout Plan- Drawing No.00201, Rev 00, Scale 1:350 @ A0;
    - Proposed Site Layout Plan- Drawing No.000003, Rev 00, Scale 1:750 @ A0;
    - Proposed Elevations Plan- Drawing No.001010, Rev 00, Scale 1:350 @ A0; and
    - Proposed Roof Sections Plan- Drawing No. 00200, Rev 00, Scale 1:350 @ A0.
- Noise Report; and
- Air Quality Report.

1.4 Assessment of the Proposal and Report Structure

As identified within Planning Policy Wales, planning applications should be determined in accordance with the approved or adopted development plan unless material considerations indicate otherwise.

This Planning, Design, and Access Statement seeks to provide a background and overview of the application proposal and an assessment of compliance with regard to relevant national and local policy. This document is structured as follows:

- Section 1 – Introduction;
- Section 2 – Site Location and Description;

- Section 3 – Proposed Development;
- Section 4 – Design and Access;
- Section 5 – Planning Policy Context;
- Section 6 – Material Considerations; and
- Section 7 – Summary and Conclusions.

2.0 Site Location and Description

This Section of the PDAS provides a description of the Site and the surrounding area. Additionally, it provides an overview of relevant planning history related to the Site.

2.1 Wider Site Context

Kellogg's Wrexham Site is situated within the Wrexham Industrial Estate on Bryn Lane, Wrexham, LL13 9UT. Wrexham Industrial Estate is located approximately 2km to the east of the urban area of Wrexham. It is accessed via the A534 which provides onward links to the A5156 in the northwest and the A41 in the northeast.

The industrial estate, which consists of a number of industrial and commercial units, is located to the east of Wrexham. The Kellogg's factory is situated on the northeastern side of the wider industrial estate. The National Grid Reference (NGR) for the approximate centre of the Site is **SJ 38817 50552**.

Figure 1 below provides an aerial image of the Kellogg's Wrexham Site, showing it in the context of the surrounding Wrexham Industrial Estate.

Figure 1: Aerial Image of Site



While the Site is largely set within a commercial/ industrial area, three residential properties are located immediately to the north, adjacent to the Ridley Wood Industrial Complex. A further residential property is located to the northwest, beyond Bryn Lane. Nevertheless, the surrounding area predominantly comprises a mixture of manufacturing, industrial, warehouse and waste recycling site use.

To the north, the Site is bound by other industrial and commercial units, to the northwest is the Bryn Business Centre retail park, which houses businesses such as CrossFit Wrexham, and All4Pets. Directly to the north, are other business units. Further afield, Bryn Lane bounds the entire Industrial Estate, beyond this are agricultural fields.

There is an internal road that encircles the central factory building allowing cars and HGVs to access all areas of the Site. There are areas of parking situated along the eastern and western boundaries. Additionally, there is a weighbridge, associated with the HGV trailer parking to the

southeast. The Site is accessed via an entrance from Bryn Lane to the southeast of the Site, whilst loading bays are located on the northern and southern boundaries.

The remainder of the Site comprises soft landscaping, including areas of grass, trees and three ponds located within the north, east, and west. The wider Site is also bound by areas of mature tree belts and further grassland and ponds.

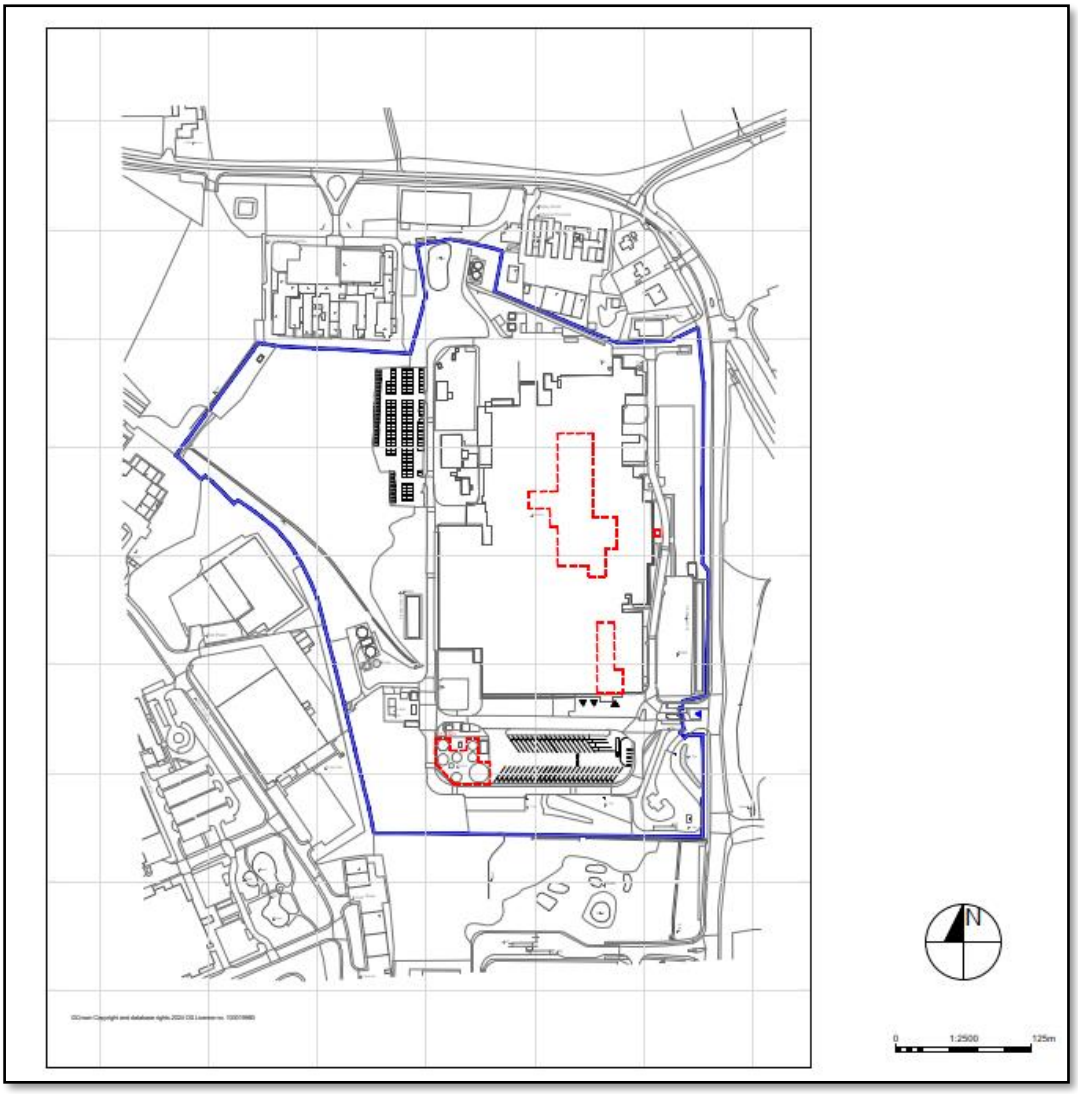
2.2 The Application Site

The application Site is located within the wider Kellogg's manufacturing Site, which is within the freehold land ownership of the applicant. The Kellogg's Wrexham Site is approximately 17.9 hectares in area and comprises a large factory building (c. 43,000 m^2) and offices (c. 2,400 m^2) within the centre of the Site.

The application Site comprises two key areas, the first being the main factory, specifically the roof, and the second being the effluent treatment plant. The application Site covers an area of approximately 8277m^2 (0.82 hectares).

The application Site is identified below in **Figure 2** denoted by the red line, whilst the wider Site is identified by the blue line. The application Site can also be seen on the submitted Site Location Plan (drawing no. 000001).

Figure 2: Application Site



2.3 Environmental Constraints

As the Site is located within an existing Industrial Estate and is designated as a key employment area within the Wrexham Local Development Plan (Polices EM1 and EM2) there are few environmental designations situated on or near the Site.

2.3.1 Landscape Designations

The Site is situated within National Landscape Area (NLA) 13, Wrecsam a Glannau Dyfrdwy (Deeside and Wrexham). This NLA covers a large area with a wide variety of characteristics, this includes a rich industrial heritage that carries through to the present day.

2.3.2 Ecological Designations

In terms of ecological designations, there are not any designations situated on or near the Site, this includes Local Nature Reserves (LNR), National Nature Reserves (NNR), Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar Sites, Sites of Special Scientific Interest (SSSI), and Areas of Outstanding Natural Beauty (AONB).

The closest ecological designation to the Site is the Afon Dyfrdwy (River Dee) SSSI, which is situated approximately 2.42 km to the east of the Site.

There are some areas of Ancient Woodland situated within the Wrexham Industrial Estate, however, none directly bound the Site.

On a local level, there is a Local Designated Site of Nature Conservation and Geological Importance (Policy NE2) situated to the South of the Site. **Figure 3** below shows the constraints map sourced from WCBC that highlights this.

Figure 3: Constraints Map



2.3.3 Archaeology and Heritage

In terms of Archaeology and Heritage, there are not any Scheduled Monuments or Listed Buildings situated on or near the Site.

The nearest Listed Buildings to the Site include:

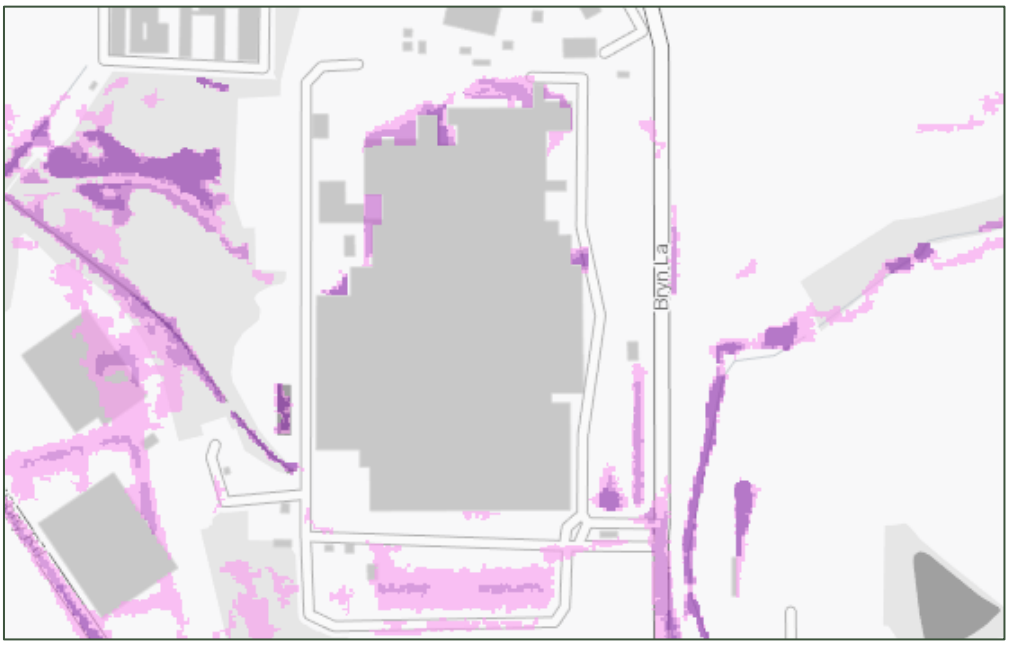
- New Holt Lodge Farm, Grade II Listed, 0.94km north west;
- Cornish Hall, Grade II Listed 1.65km north;
- Chapel House Farm House, Grade II Listed, 1.28km east;
- Church of St Paul, Grade II Listed, 1.48km east;
- Plough Inn PH, Grade II Listed, 1.55km east; and
- Cobham Cottage, Grade II Listed, 1.68km east.

The nearest Scheduled Monument to the Site is the Sutton Green Round Barrow, which is situated approximately 2.40km to the southeast of the Site.

2.3.4 Flood Risk

In terms of Flood Risk, the Site is not situated within an area of risk from flooding from rivers or sea (EA Flood Map for Planning). However, there are small areas of the wider Site that are at risk of surface water flooding, mostly centred to the north and south of the wider Kellogg's manufacturing Site. **Figure 4** below shows the surface water flood risk.

Figure 4: Surface Water Flood Risk



As the Site is already set within an industrial context, there are already pre-existing surface water drainage systems on the Site that the proposal will utilise; as such, there will be no change in the surface water drainage at the Site.

It is also not considered that the proposed installation on the factory roof, nor the expansion of the effluent treatment plant will result in an increased flood risk to the Site or the surrounding area.

2.3.5 Public Rights of Way (PRoW)

There are not any Public Rights of Way (PRoW) dissecting or directly bounding the Site. There is a PRoW (ISY/6) to the northeast of the Wrexham Industrial Estate, which connects Ridley Wood Road to Francis' Lane.

To the southeast, lies another PRoW (ISY/18) which connects Bryn Lane to the B5130. Neither of the PRoWs are likely to be negatively impacted by the proposed development, given the pre-existing industrial nature of the Site.

2.4 Planning History

Wrexham County Borough Council's online planning portal[1] provides access to all planning applications related to the Site. **Table 1** below details the planning applications associated with the Site.

Table 1: Planning History

Application Ref.	Description of Development	Decision	Decision Date
P/2024/1550	Proposed installation of temporary storage, welfare and office facilities for a period of 24 months (2 years) and associated works.	Granted	10/02/2025
P/2024/1549	Installation of 2 no units to create storage, welfare and office facilities.	Granted	23/0/2025
P/2023/0869	Discharge of condition 5 (biodiversity) of planning permission p/2023/0666.	Granted	16/01/2024
P/2023/0666	Installation of single-storey modular building for occupational health facilities to the workforce.	Granted	17/11/2023
P/2019/0152	Installation of a 20m silmline greenfield pole at the southern end of site with shrouded antennae and 0.3M link transmission dish with cabinets at ground level to house electronic apparatus.	Granted	16/05/2019
P/2017/0380	Application for approval of details reserved by conditions imposed under planning permission P/2017/0090 – Conditions 4 and 5.	Granted	Unknown
P/2017/0090	Single-storey rear extension to house new chocolate storage tanks (Kelloggs training centre portacabin).	Granted	11/04/2017
P/2017/0588	Introduction of 3 no. Air handling/air cleaning units on to the existing flat roof area of the building (emission points/flues extend upwards to 16m above ground floor level - 8m above respective roof level).	Granted	16/08/2017
P/2013/0248	Removal of Condition 1 of Planning Permission P/2008/0936 to allow the permanent retention of storage facility building	Granted	20/05/2013
2011/0573	Construction of new raised access walkway and canteen block Infill of existing 2-storey modular office block Construction of extended fully enclosed goods in canopy Installation of new chocolate tank and new enclosure.	Granted	07/09/2011
P/2010/0811	Erection Of Bulk Syrup Storage Building	Granted	30/09/2010

[1] https://www.wrexham.gov.uk/service/search-planning-applications

Application Ref.	Description of Development	Decision	Decision Date
P/2008/0936	Retention and continued use of temporary storage facility (previously granted under code no. P/2004/0982).	Granted	13/10/2008
2005/0112	Portable Foods Offices and Facilities Accommodation/ Upgrade.	Granted	19/04/2006
2005/1441	Silo Block Building.	Granted	19/12/2005
2005/0112	Relocation of existing workshop and erection of 2 storey office complex.	Granted	19/04/2005
P/2004/0982	Retention and continued use of temporary storage facility (previously granted under code no. P/2001/10/11)	Granted	26/08/2004
2004/0366	4 temporary Portakabins.	Granted	22/03/2004
2004/0116	Installation of Goods/ Persons Lift and Lift Shaft – N.W. Exterior of Building (P.Fds.).	Granted	04/02/2004
P/2001/1011	Erection of temporary storage facility.	Granted	23/10/2001
2001/0147	New Vehicle Entrance.	Granted	22/10/2001
2000/1057	New Chiller Building (P.Fds.)	Granted	20/11/2000
2000/0119	Buhler Room and Penthouse - 4th Process Roof.	Granted	15/02/2000
2525	Tank Storage Facility (P.Fds.)	Granted	12/10/1998
2086	Erection of Temporary Toilet Block & Quick Break Area (3-year period).	Granted	09/06/1998
1580	Installation of Two Loading Doors and Canopy to Rear elevation (P.Fds.)	Granted	10/11/1997
21718	Extension to Existing Car Park.	Granted	07/10/1993
14173	Relocation of previously approved Chimney adjacent to Boiler House.	Granted	22/06/1987
14124	Extension to Existing High Voltage Substation.	Granted	15/06/1987
13710	Extension to Cereal Manufacturing Facility Including Ancillary Plant & some Equipment Relocations.	Granted	09/02/1987
13460	Relocation 2 Sugar Silos & Spent Grains Hopper plus Relocation of Contractors Office & Car Park.	Granted	10/11/1986
12560	Extension to Flavour Penthouse.	Granted	07/01/1986
12124	Extension to Effluent Treatment Plant.	Granted	17/06/1985
11615	Extension to Admin. Building & Provision of Additional Car Parking.	Granted	14/02/1985
11156	Erection of New North Plant Penthouse.	Granted	03/08/1984
11056	Erection of Additional Water Dosing Building & Cooling Tower & Pumps.	Granted	04/07/1984
10988	Amendment to Ref 10148 - Warehouse & Marshalling Building.	Granted	25/05/84

Application Ref.	Description of Development	Decision	Decision Date
10913	Erection of Penthouse on Existing Roof.	Granted	23/05/1984
10722	Erection of Water Dosing Building & Cooling Tower & Pumps.	Granted	10/03/1984
10351	Two New Penthouses & Cyclone Platforms on Existing Roof.	Granted	29/11/1983
10148	Warehouse and Marshalling Building.	Granted	27/07/1983
9548	Two Storey Extension to Packing Store and Single Storey Extension to Boiler House.	Granted	03/03/1983
9376	Erection of Bulk Vehicle Sampling Bay.	Granted	11/11/1982
4576	Erection of Three Palm Oil Tanks.	Granted	25/10/1978
1264/5	Water Meter House and Chimney.	Granted	21/04/1977
1264/4	Relocation of Oil Tank.	Granted	06/09/1976
1264/3	Landscaping & Fencing.	Granted	30/07/1976
1264/2	Water Tank & Pump House, Oil Storage Tanks, Bund Pipes & Gantry.	Granted	16/06/1976
1949	Gatehouse, Factory Entrance Layout, Weighbridge, Gas Meter & Govnr. House, Waste Storage Building.	Granted	23/02/1976
1264/1	Minor Amendments to Erection of Factory (Ref 1264).	Granted	19/12/1975
1628	Erection of New Substation.	Granted	20/11/1975
1264	Erection of New Factory to Manufacture Cereal Foods and Formation of New Access.	Granted	26/06/1975
360	Erection of Factory for Production of Cereals, and Formation of New Access.	Granted	08/08/1974

3.0 Proposed Development

This section of the PDAS aims to describe the proposed development at Kellogg's Wrexham manufacturing site, situated at Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT.

3.1 Description of Development

The full planning application seeks consent for the following:

> *"Installation of plant, machinery, ducting, extracts and flues on the main building and the expansion of the effluent treatment plant"*

The proposed development will comprise modifications and additions to the main manufacturing building roof and an expansion to the existing effluent treatment plant. These will allow for the closure of the Kellogg's manufacturing site in Manchester which is proposed for 2026 and enable the expansion of production at the Wrexham Site.

Further information regarding the proposed development is detailed in sections 3.2 and 3.3 below.

3.2 Main Factory Building

3.2.1 Existing Roof

The main factory building is situated centrally within the Site, covering an area of approximately 4.7ha (46,987 m^2). The existing roof of the factory building has plant, ducting, extracts and other equipment associated with the various production lines as can be seen in **Figure 5** and **6** below.

Figure 5: Existing Roof - 4th Process (Looking Northwest)

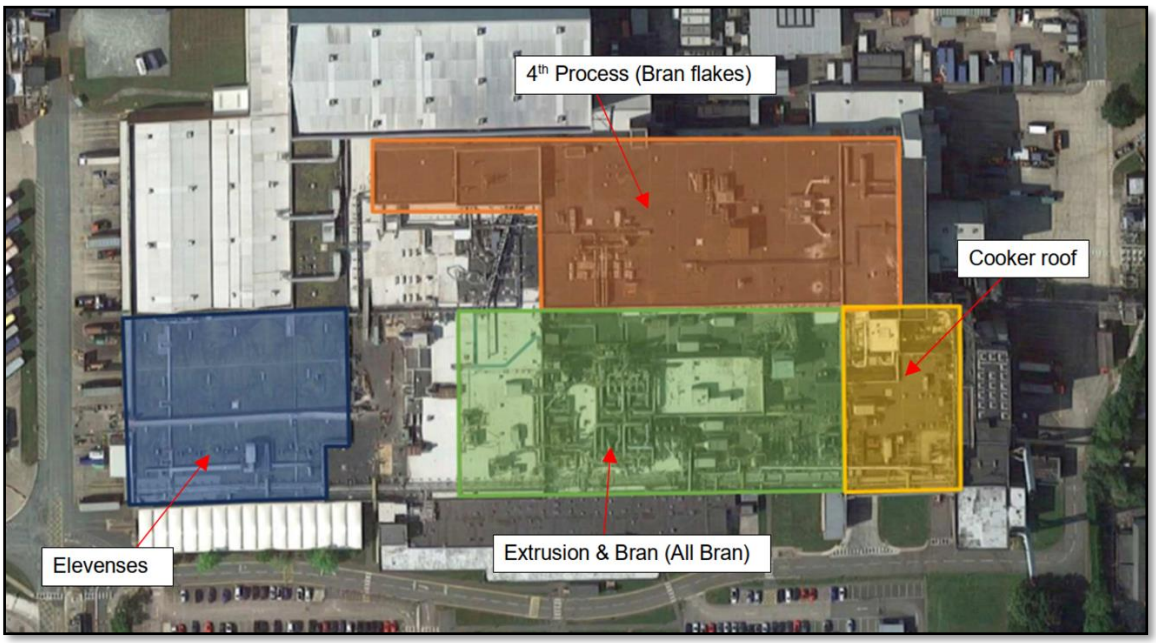


Figure 6: Existing Roof- Extrusion and Bran Roof (Looking North)



The existing roof infrastructure directly relates to the manufacturing process below it and **Figure 7** denotes the general areas and how they relate to the equipment on the roof.

Figure 7: Roof Area Guide



A ‘snapshot’ image of the existing roof elevations can be seen below in **Figures 8- 11** with full detail provided on the submitted planning application drawing- Existing Elevations Plan- Drawing No.001011, Rev 00, Scale 1:350 @ A0.

Figure 8: Existing Western Elevation

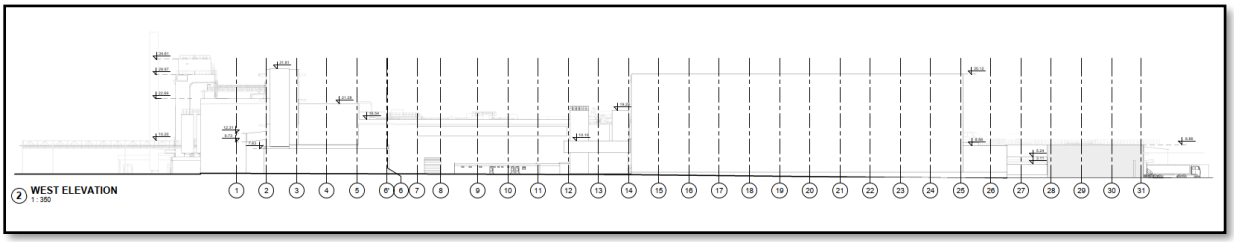


Figure 9: Existing Southern Elevation

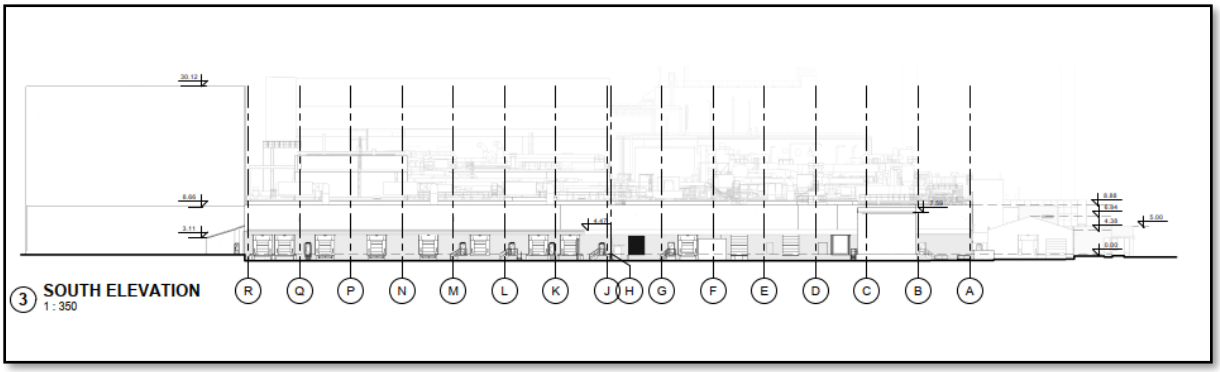


Figure 10: Existing Northern Elevation

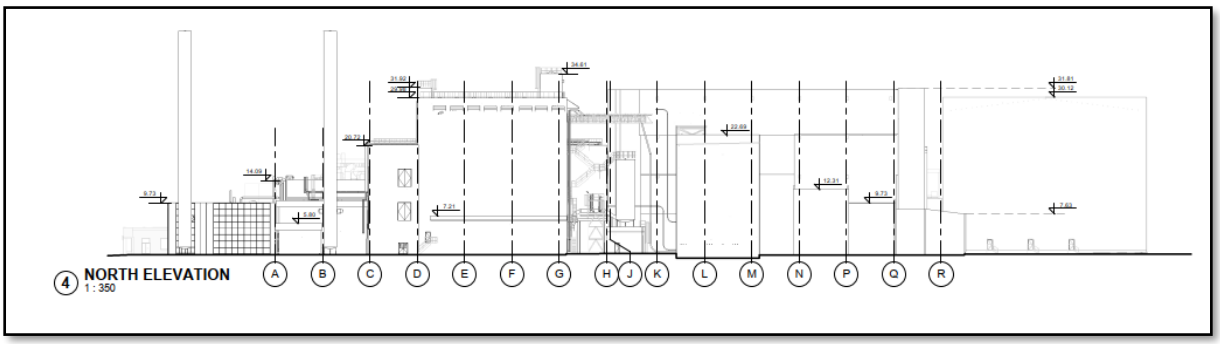
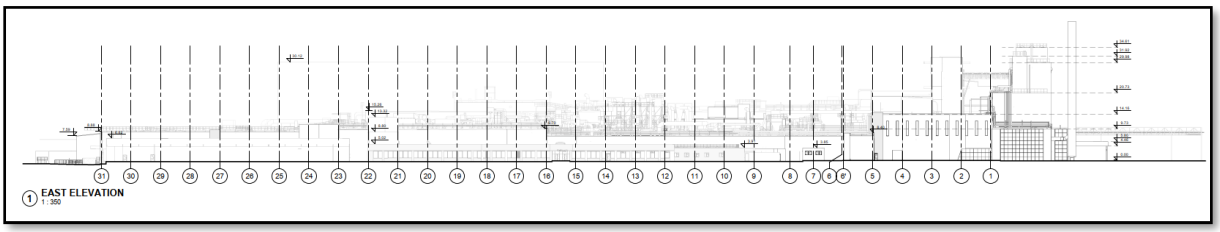


Figure 11: Existing Eastern Elevation



3.2.2 Proposed Roof Alterations

A number of alterations and additions are being made as part of the proposed development which include the following:

- Rotoclones
- Cyclone and Fan for Cooler
- Chillers
- Units
- Ventilation Unit
- Steel Platform.

A 'snapshot' image of the proposed roof elevations can be seen below in **Figures 12- 15** with full detail provided on the submitted planning application drawing Proposed Elevations Plan- Drawing No.001010, Rev 00, Scale 1:350 @ A0. The additions are annotated in colour.

Figure 12: Proposed Western Elevation

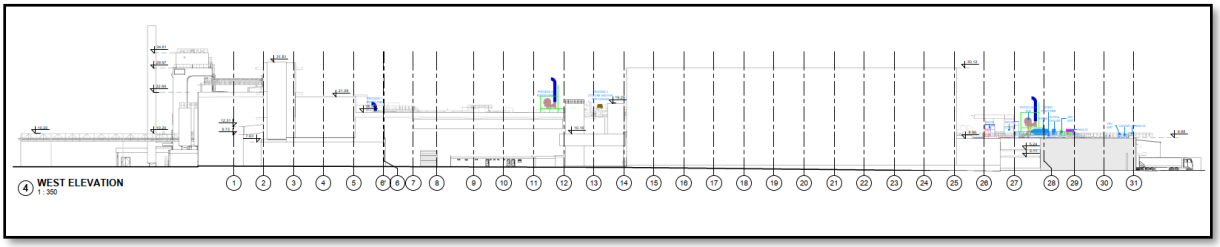


Figure 13: Proposed Southern Elevation

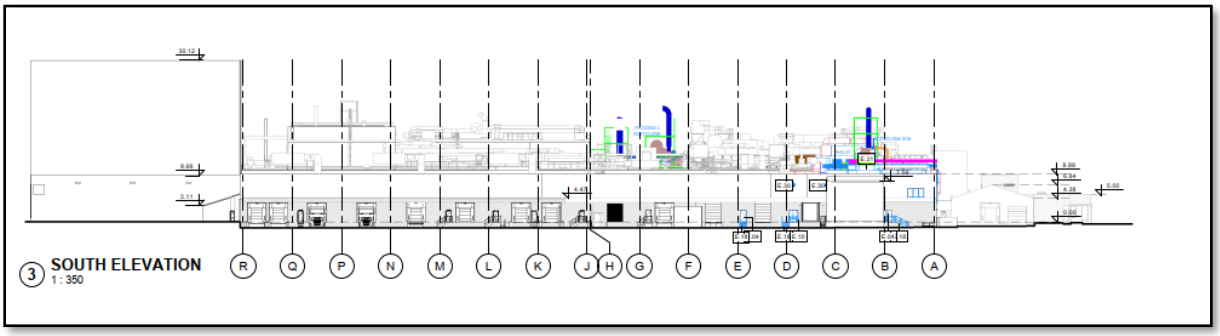


Figure 14: Proposed Northern Elevation

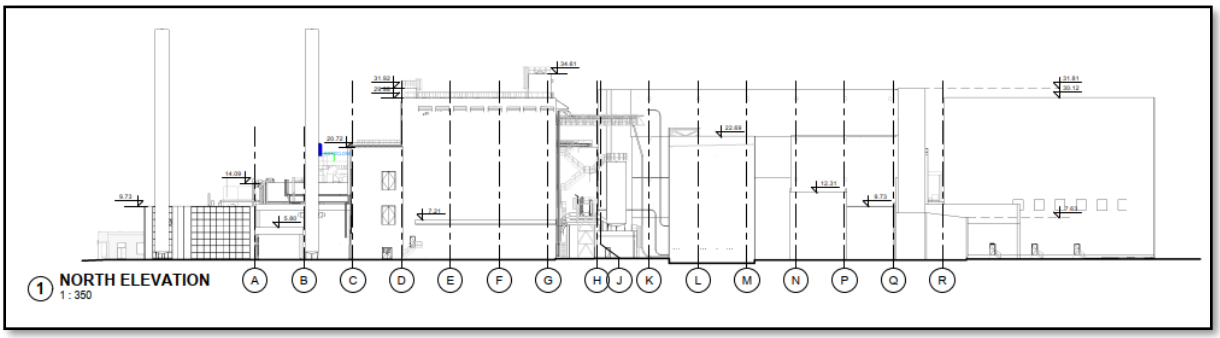
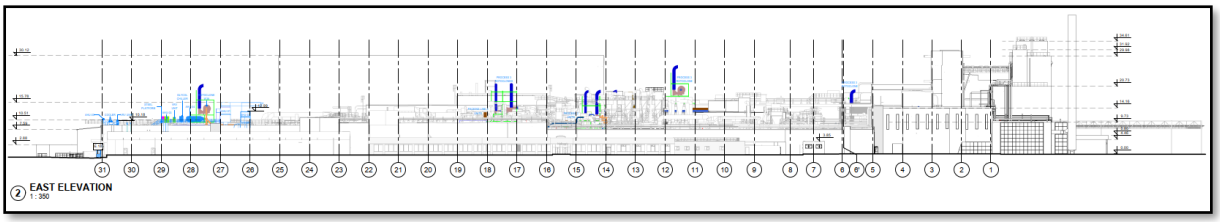


Figure 15: Proposed Eastern Elevation



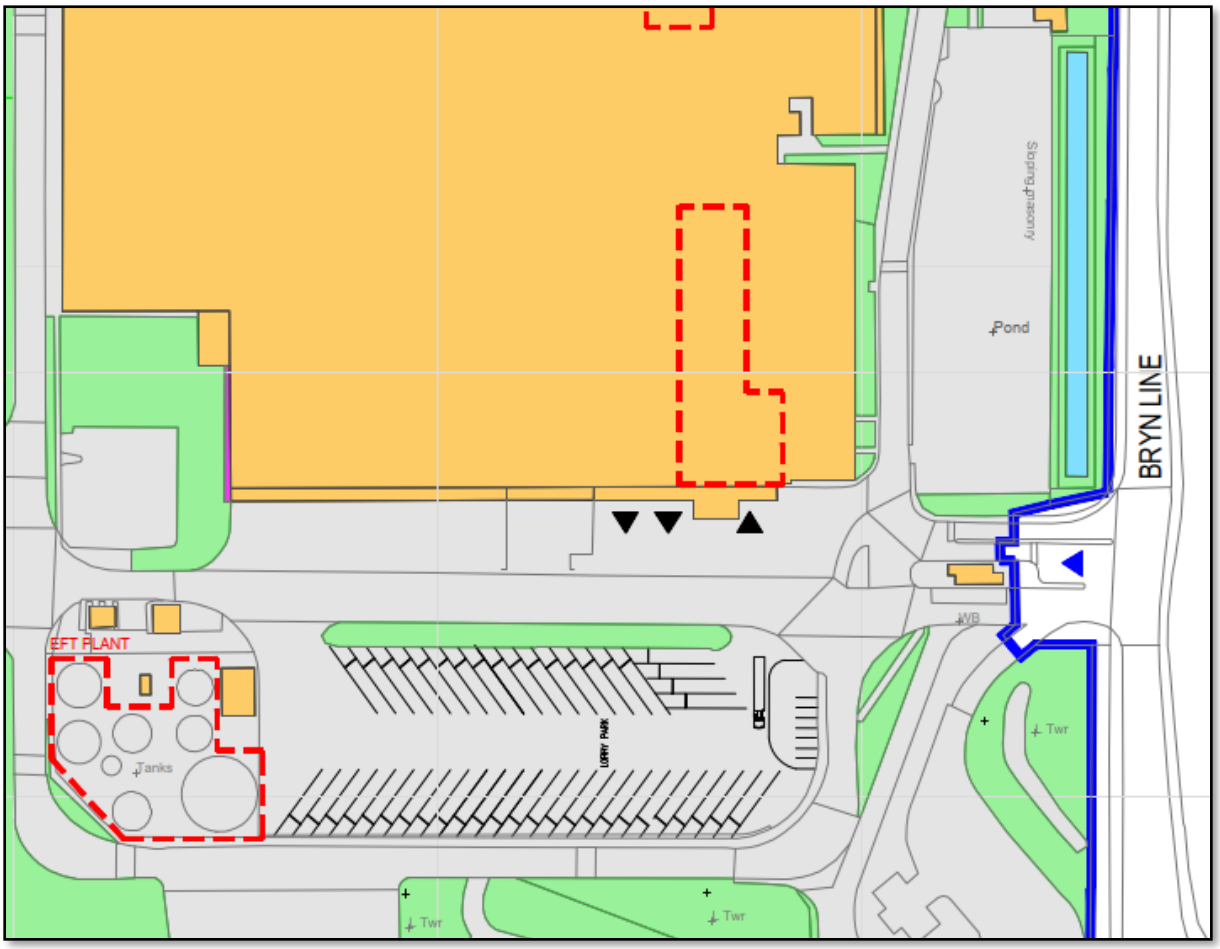
The proposed roof section plan (Proposed Roof Sections Plan- Drawing No. 00200, Rev 00, Scale 1:350 @ A0) denotes all of the equipment which is being added as part of the proposed development along with detailing the equipment which is being removed (in red).

3.3 Effluent Treatment Plant

3.3.1 Existing Effluent Treatment Plant

The Effluent Treatment Plant (ETP) is situated to the south of the main factory building, it spans approximately 1609.43 m^2 (0.16 ha) and is utilised as the effluent treatment plant for current on-site activities. **Figure 16** shows the ETP in the context of the wider Site.

Figure 16: ETP in the context of wider Site



3.3.2 Proposed Alterations to Effluent Treatment Plant

It is proposed to increase the heights of the two balancing tanks that form part of the Effluent Treatment Plant. Currently these sit at 7.5 metres (m) in height, and it is proposed that these will increase to 11.6 m in height.

No other changes to the ETP are proposed.

3.4 Parking

Staff and third-party contractors will park within existing designated parking areas. There is sufficient parking within the wider site area that this will not impact the day-to-day operations of the site.

3.5 Waste and Other Facilities

There are sufficient existing waste and recycling facilities within the wider site area and additional provision does not need to be made as part of this application. Furthermore, all existing ad-hoc facilities such as designated smoking areas or cycle storage can also be utilised by staff and third-party contractors and no additional provision need be made.

4.0 Design and Access

4.1 Design

All the proposed additions and equipment that will be added as part of the proposed development will be provided by a third-party supplier. The equipment to be added to the existing roof will be similar to that already in place. All the equipment will be uniform in design and in keeping with the wider appearance of the Kellogg's manufacturing site.

4.2 Access

4.2.1 Existing Access

The existing access to the Site which is off of Bryn Lane will not be changed and as such the proposed development will make use of the existing arrangements to access and egress the Site.

4.2.2 Vehicular Access

The application does not propose any alterations to the existing site access or the internal roads on Site.

4.2.3 Inclusive Access

The proposed development will not impact the current access to the Site nor any existing access arrangements for those with physical impairments or disabilities.

Notwithstanding, due to the industrial nature of the proposed development, i.e. plant machinery being located on the factory roof, these will not be accessible for those with mobility issues and will only be accessed by specially trained staff who are experienced in working at height.

4.2.4 Emergency Access

As the existing Site access can comfortably accommodate large delivery vehicles, it will be suitable for access by all forms of emergency vehicles should there be a requirement for them to attend the Site.

5.0 Planning Policy Context

This section of the PDAS describes the relevant planning policy framework associated with the proposal. This section provides a review of the statutory development plan and key planning policies at a national and local level and how they relate to the proposed development.

5.1 National Planning Policy

5.1.1 Future Wales, The National Plan 2040

Future Wales is the national development Framework for Wales and sets the direction for development until 2040. It is a development plan with a strategy for addressing the key national priorities through the planning system. The document was first published on 24th February 2024 and is a spatial plan, which means it sets a direction for where Wales should be investing in infrastructure and development.

The proposed development site is located in the northern area of the plan and identified as being less sparse and more urban than other areas.

Relevant Policies are set out below:

Policy 1- Where Wales will grow

Policy 1 relates to sustainable growth in all parts of Wales and identifies National Growth Areas and Regional Growth Areas:

'The National Growth Areas are:

- *Cardiff, Newport and the Valleys*
- *Swansea Bay and Llanelli*
- *Wrexham and Deeside*

The National Growth Areas are complemented by Regional Growth Areas which will grow, develop and offer a variety of public and commercial services at regional scale. There are Regional Growth Areas in three regions:

- *The South West*
- *Mid Wales*
- *The North*

Development and growth in towns and villages in rural areas should be of appropriate scale and support local aspirations and need.'

Policy 20- National Growth Area- Wrexham and Deeside

Policy 20 is in relation to national growth areas and identifies Wrexham and Deeside as one of these areas. The Policy states that:

'Wrexham and Deeside will be the main focus for growth and investment in the North region.

Strategic and Local Development Plans across the region must recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing and transport infrastructure.

The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Wrexham and Deeside's strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.'

The Policy commentary also states '*In accordance with Future Wales' spatial strategy, growth in the North region should be focused on the main existing built-up areas of Wrexham and Deeside. The National Growth Area includes Wrexham and the Wrexham Industrial Estate, Broughton, Buckley, Deeside and the Deeside Industrial Park.'*

The Wrexham Industrial Estate is specifically highlighted as an area for growth. The proposed development will allow for an existing commercial business to expand its manufacturing operations.

5.1.2 Planning Policy Wales, Edition 12 (PPW) (February 2024)

Edition 12 of Planning Policy Wales (PPW) was issued in February 2024 and sets out the relevant land use planning policies of the Welsh Government.

The central objective of the PPW is to ensure that the planning system contributes to the delivery of sustainable development, improves the social, economic, environmental, and cultural well-being of Wales, as per the Planning (Wales) Act 2015, the well-being of future generations (Wales) Act 2015 and other key legislation.

The PPW is separated into subject areas and chapters. The following topics are considered to be of relevance to the proposed development.

- Section 3 – Strategic and Spatial Choices;
- Section 4 – Active and Social Places;
- Section 5 – Productive and Enterprising Places; and
- Section 6 – Distinctive and Natural Places.

5.1.2.1 Section 3 – Strategic and Spatial Choices

Paragraphs 3.61 – 3.63 of section 3 discuss supporting infrastructure, this section highlights the importance of providing adequate and efficient infrastructure within Wales. It is stated within paragraph 3.62 that *"planning authorities should, in conjunction with key providers, take a strategic and long-term approach towards the provision of infrastructure as part of plan-making".*

Paragraph 3.63 goes on to state that *"development should be located so that it can be well serviced by existing or planned infrastructure"*. The proposal is to be based within the Wrexham Industrial Estate, within the Kellanova site which is a pre-established manufacturing site.

Overall, it is considered that the proposed development is in line with the key themes set out within this section of the PPW. The proposed changes to the Site will aid the internal expansion of the Kellogg factory and allow for the positive expansion of the Kellogg offering, positively contributing to the expansion of a key manufacturing site within north Wales.

5.1.2.2 Section 4 – Active and Social Places

Section 4 of the PPW relates to Active and Social Places, these places are described as those *"which promote our social, economic, environmental, and cultural well-being"*. In regard to the proposed development, the topic of retail and commercial development would be of relevance.

Section 4.3 refers to retail and commercial development; it highlights within paragraph 4.3.1 that *"retail and commercial centres are hubs of social and economic activity and the focal point for a diverse range of services which support the needs of local communities"*.

Overall, it is considered that the manufacturing taking place at the wider Kellogg Site is vital in terms of providing for the local economy and establishing Wrexham as a key hub for manufacturing within Wales. The proposed development is considered a vital player in

elevating and improving the current level of manufacturing on-site, allowing for the site to expand.

5.1.2.3 Section 5 – Productive and Enterprising Places

Section 5 of the PPW covers productive and enterprising places, this covers the economic components of placemaking within Wales. There are many key themes and issues that are highlighted within this section, in terms of the proposed development Section 5 highlights that *"supporting and enabling training, education, infrastructure, construction, and manufacturing capacity to support progress towards a circular economy" (pg. 77)* it is then further stated that *"drawing on the principles of the circular economy to reduce unnecessary waste and encourage high-quality manufacturing" (pg. 78)* is encouraged.

In reference to the economy, the PPW states that "*a prosperous Wales can be achieved through increased economic activity across all sectors at all scales"*. Section 5.1 refers to economic infrastructure, stating that *"infrastructure … plays a pivotal role in maintaining the economic well-being of Wales*", the section goes on to state that *"poor infrastructure can be both a disincentive to investment and growth, and have a detrimental impact on quality of life, prosperity, and the well-being of communities".*

Section 5.4 refers to economic development, this section of the PPW highlights that the Welsh Government *"seeks to maximise opportunities to strengthen the foundational economy"* and that *"the planning system should be supportive of this aim"*.

The proposed development will aid in the expansion of infrastructure within Wrexham and Wales, this aligns with the economic vision that is set out in the PPW.

5.1.2.4 Section 6 – Distinctive and Natural Places

Section 6 of the PPW refers to Distinctive and Natural Places, stating that "*The characteristics and environmental qualities of places vary across Wales, creating distinctive or unique features associated with their particular natural or cultural heritage and these should be recognised and valued, in and of, themselves and should be protected and enhanced*".

Section 6.2 of the PPW refers to green infrastructure, within this section, the value of green infrastructure is highlighted with paragraph 6.2.3 stating that *"the components of green infrastructure, by improving the resilience of ecosystems, can result in positive benefits to well-being including flood management, water purification, improved air quality, reduced noise pollution and local climate moderation, climate change mitigation and food production".*

Further to this Sections 6.3 (Landscape), 6.4 (Biodiversity and Ecological Networks), and 66 (Water and Flood Risk) have also been reviewed.

In terms of the proposed developments, there are unlikely to be significant negative impacts on any green infrastructure that is present on the Site. Due to the site's industrial context, being set within a pre-established industrial site, and the gaining of permitting permission from the Environment Agency the developments within this proposal are considered to be entirely viable when reviewing it against Section 6 of the PPW.

5.2 Local Planning Policy

5.2.1 Wrexham Local Development Plan 2 (LDP2) 2013 to 2028

The Wrexham Local Development Plan was adopted on 20th December 2023 and replaced the Wrexham Unitary Development Plan, it covers the plan period of 2013 to 2028 and forms part of the Statutory Development Plan.

The following policies are of relevance to the proposed development:

- Policy SP2: Location of Development;

- Policy SP6: Green Wedge;
- Policy SP8: Economic Growth, Employment, and Enterprise;
- Policy SP9: Wrexham Industrial Estate;
- Policy EM1: Protection of Existing Employment Land;
- Policy NE2: Local Designations for Nature Conservation and Geological Importance; and
- Policy NE6: Waste Water Treatment and River Water Quality

5.2.1.1 Policy SP2 – Location of Development

Policy SP2 refers to the location of development, stating that *'new development is directed to the defined settlement limits and employment areas as identified on the Proposals Map'.*

Referring to the Proposals Map, the Wrexham Industrial Estate is highlighted as a key strategic site, under Policy SP9. Paragraph 3.25 states that *'directing development to these key areas makes the best use of existing infrastructure and services and allows homes, jobs and other facilities to be located in close proximity to each other, reducing the need to travel by car.'*

It is considered that these proposed changes to the Site are vital to the future of the wider Kellogg's Site as they will support the expansion and longevity of the company at their Wrexham location, following the move to have all manufacturing operations at this Site.

The expansion of the manufacturing line will likely result in further employment opportunities for local people in the surrounding area, whilst also solidifying Wrexham and Wales as a key food manufacturer within the UK.

5.2.1.2 Policy SP6 – Green Wedge

Policy SP6 refers to areas within Wrexham that have been designated as Green Wedges to ensure the protection and openness of land.

It is noted that there is a green wedge situated to the west of the Wrexham Industrial Estate. However, given the pre-existing industrial context of the industrial estate and that the Kellogg's Site itself does not directly bound the green wedge itself, it is considered that the proposal is unlikely to result in a negative impact.

5.2.1.3 Policy SP8 – Economic Growth, Employment, and Enterprise

Policy SP8 supports the expansion and growth of Wrexham regarding employment and enterprise. The policy aims to ensure that Wrexham continues to be *'a key economic driver in North Wales and the wider region'.*

Paragraph 3.59 states that *'one of the objectives of the Plan is to support a vibrant, diverse, and competitive local economy that provides a range of job opportunities to enable new and existing businesses to grow in Wrexham'.*

It is considered that the proposal will accord with Policy SP8, this is because the proposed development will support the improvement and expansion of the Kellogg's manufacturing offering within Wales.

Kelloggs is a global brand, and allowing for the expansion of its production line within Wrexham provides a great opportunity for economic growth, solidifying Wrexham's place as a key employer within North Wales.

This also aligns with national policy, which designated Wrexham as a National Growth Area.

5.2.1.4 Policy SP9 – Wrexham Industrial Estate

Policy SP9 refers to Wrexham Industrial Estate (WIE), which has been designated as the County's Key Business Sector Area as per the Plan's proposal map. Policy SP9 states that: '*Wrexham Industrial Estate as shown on the proposals map is the County Borough's Key Business Sector Area and will be the primary focus for new employment development over the plan period for class B1, B2 and B8 employment. Land is also protected on the estate for a strategic ecological network for a number of local, national and internationally protected species and habitat.'*

Paragraph 3.66 goes on to state that the purpose of Policy SP9 is to *'set out the importance of WIE on a local and regional basis and to ensure its protection and promotion as the County Borough's Key Business Sector area…'.*

It is considered that the proposal aligns with Policy SP9. The proposal will support the vital expansion of Kellogg's manufacturing line allowing for further employment opportunities within the WIE.

5.2.1.5 Policy EM1 – Protection of Existing Employment Land

Policy EM1 highlights the County Borough's aim to ensure that existing employment areas are protected from non-employment related land uses. The policy highlights Wrexham Industrial Estate as a key protected employment area, to be used for B1, B2 and B8 use classes.

The proposal, which will result in the expansion of the existing effluent treatment plant, and the installation of plant and machinery on the roof of the main factory building aims to aid in the construction of vital expansion works to the Kellogg's manufacturing lines. This is likely to result in an overall positive impact, as it will solidify Kellogg as a key employer and manufacturer within Wales.

5.2.1.6 Policy NE2 – Local Designations for Nature Conservation and Geological Importance

Policy NE2 refers to local designations relating to nature conservation and geological importance, it states that developments can only be permitted if they do not adversely impact the locally designated sites, habitats and species.

While there is a designated area situated to the south of the Site, it is overall not considered that the proposed development would impact the local designation.

5.2.1.7 Policy NE6 – Waste Water Treatment and River Water Quality

Policy NE6 states that *"all new development will only be permitted where there is no adverse effect on the integrity of the River Dee and Bala Lake SAC in particular through the treatment of wastewater"*.

Overall, it is considered that the expansion of the effluent treatment plant will not negatively impact on the water bodies highlighted within the Policy. The expansion of the effluent treatment plan is proposed to positively impact the site's capacity for wastewater treatment and will be in line with the requirements reflecting the site's necessary expansion.

As referenced within paragraph 4.101 it is required that proposals that cannot connect to public wastewater treatment must *"justify why the connection is not feasible and demonstrate compliance with Welsh Government Circular 008/2018 and Natural Resource Wales guidance for connection to private treatment work"*.

Given that the proposed development is for the expansion of the plant, it is therefore considered that the existing plant already adheres to this guidance and aligns with the above policy.

6.0 Material Considerations

6.1 Water Environment

The proposed development includes the addition of plant and equipment to the existing roof and the expansion of the ETP and therefore will not result in an increase in the risk of flooding to the Site from surface water. The proposed development will utilise the current drainage already in use at the Site.

Furthermore, the areas which the plant and equipment are to be located are identified as falling within Flood Zone 1. As the total area of the proposed site does not total 1ha and the Site is also not situated within an area of high flood risk, a Flood Consequences Assessment is not required to support the application.

6.2 Ecology

The proposed development will not result in a negative impact on any areas of habitat on Site, nor will they impact any known protected species in proximity to the application Site.

6.3 Noise

A Noise Impact Assessment has been undertaken for an Environmental Permit Application and for the proposed development. The Noise Impact Assessment has been submitted alongside this PDAS in support of the planning application.

The Noise Impact Assessment included the following:

- A Baseline Survey (undertaken November 2023).
- A BS4142 Assessment of existing permitted operations.
- A BS4142 Assessment of cumulative (permitted and proposed) operations.

The assessment concluded that while the proposed changes may result in rating levels above the 2023 baseline background sound levels, they are not anticipated to worsen the existing noise impact. This is because the predicted noise levels at all receptors are either equal to or lower than the current noise levels. Therefore, it is considered unlikely that the proposed variation will cause a noise impact on the nearest noise sensitive receptors.

Additionally, the operations at the Site will comply with the noise limitation already imposed on Site through previous permissions.

6.4 Air Quality

An Air Emissions Risk Assessment (AERA) has been undertaken in support of an Environmental Permit Application and for the proposed development. The scope of the assessment was limited to consideration of pollutant releases of particulate matter (PM_{10}[2] and $PM_{2.5}$[3]).

Therefore, the objective of the study was to assess, using atmospheric dispersion modelling, the impact of PM_{10} and $PM_{2.5}$ emissions against the relevant Air Quality Standards for the protection of human health.

[2] Particulate matter where particles are less than 10 micrometres in diameter.

[3] Particulate matter where particles are less than 2.5 micrometres in diameter.

A detailed atmospheric dispersion modelling has been undertaken and was based on the following stages:

- Review of emission sources;
- Compilation of the existing air quality baseline and review of Local Air Quality Management (LAQM) status;
- Identification of sensitive receptors;
- Dispersion modelling; and
- Calculation of process contribution to ground level concentrations and evaluation against relevant environmental standards for human receptors only.

The AERA concluded that the PM_{10} and $PM_{2.5}$ contributions from all sources do not lead to any exceedances of the standards (long-term or short-term) for the protection of human health at any location outside of the Site.

Additionally the proposed development would not raise any new sources of air quality beyond those already experienced through the day-to-day operations of the Site.

6.5 Transport

The proposed development will not create significant levels of additional traffic beyond that already consented on Site. Furthermore, staff and third-party contractors will park within existing designated parking areas within the wider Kellogg's Site. There is sufficient parking within the wider Site area that this will not impact the day-to-day operations of the Site.

7.0 Summary and Conclusions

7.1 Summary

This Planning Design and Access Statement (PDAS) has been prepared by SLR Consulting Limited (SLR) on behalf of Kellogg ('the Client') to support the full planning application for:

> *"Installation of plant, machinery, ducting, extracts and flues on the main building and the expansion of the effluent treatment plant"*

This PDAS, which supports the application, has provided a thorough overview of the proposed development, including an analysis of relevant planning policy, and an analysis of the potential environmental effects.

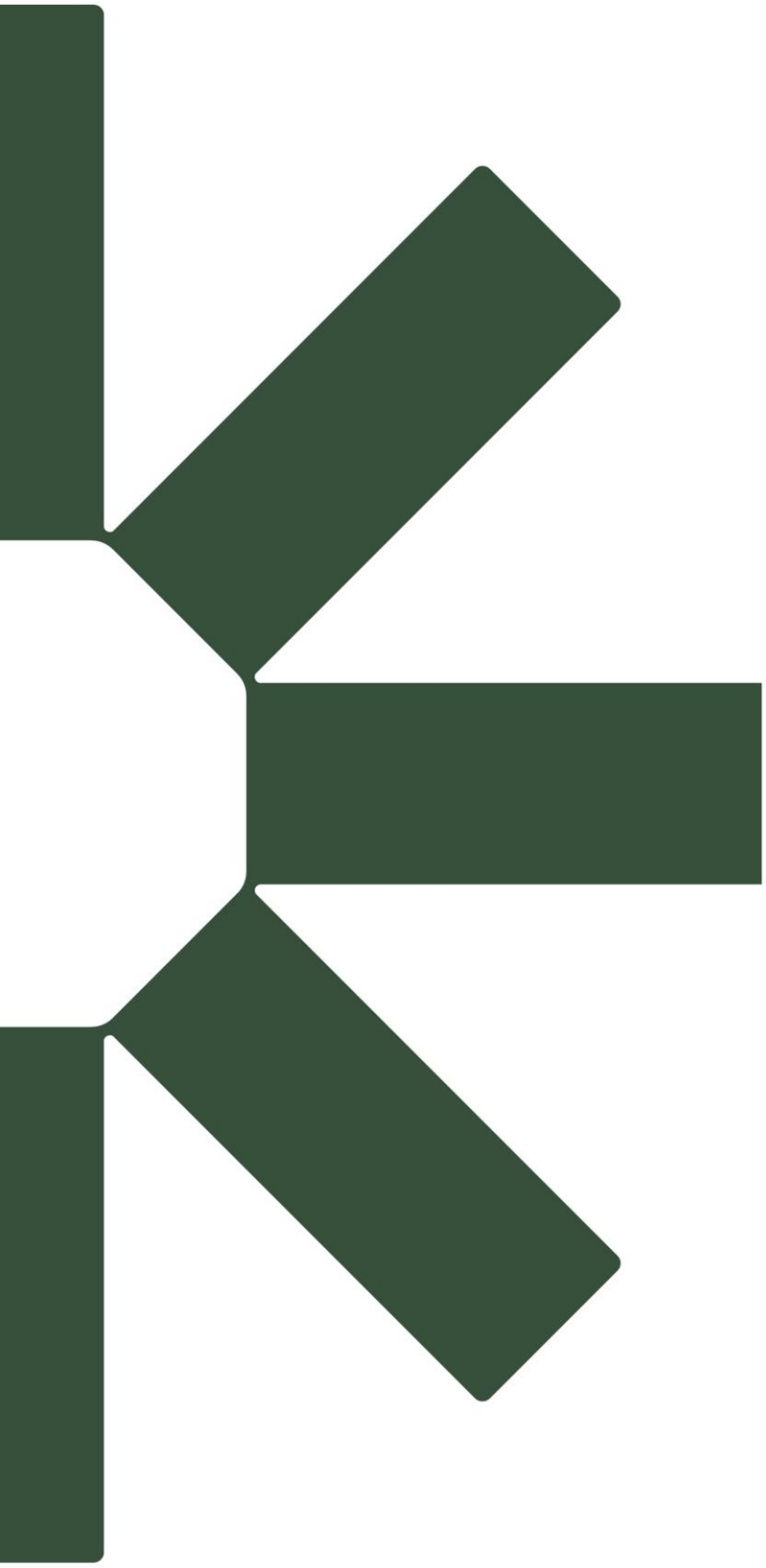
It is therefore contended that based on the points provided within this document, Wrexham County Borough Council should grant permission for this application and continue to support the continued success of the Kellogg's food manufacturing facility within Wrexham Industrial Estate.

7.2 Conclusion

The proposed development would comply with the current national and local planning policy relevant to the consideration of this application. As such, the content of this PDAS clearly indicates that the site is entirely suitable for the proposed development.

On this basis, it contended that there are no other material considerations and that the planning balance lays in favour of planning permission being granted.

We trust this document has provided sufficient information to allow for a positive determination of the application.



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