Harworth Estates Investments Ltd

Erlas Park, Wrexham

Environmental Statement Volume 1: Non-Technical Summary (ref: RJK-ES-NTS-ERlas-Rev001)

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Prepared for

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Contents

1. Introduction....3
2. Approach & EIA Methodology....5
3. Site Description....7
4. Alternatives....9
5. The Proposed Development....11
6. Landscape and Visual....15
7. Ecology....18
8. Cultural Heritage....21
9. Traffic and Transport....24
10. Air Quality....26
11. Noise....27
12. Flood Risk and Drainage....28
13. Agricultural Land....29
14. Minerals....31
15. Summary and Conclusions....33

Appendix

Appendix 1 – Site Location Plan (784-B024030-TTE-00-XX-DR-UD-03-P05)

Appendix 2 – Parameter Plan (784-B024030-TTE-00-XX-DR-UD-23-P05)

Appendix 3 – Illustrative Masterplan (784-B024030-TTE-00-XX-DR-UD-47-P03)

1. Introduction

1.1 Harworth Estates Investments Ltd ('the Applicant') are seeking to obtain outline planning permission for residential development and associated infrastructure in association with the emerging housing allocation known as KSS2 (south) on land to the east of Cefn Road, Wrexham, LL13 9TT (hereafter referred to as 'the Site'). The Site is located within the administrative authority of Wrexham County Borough Council (WCBC). A Site Location Plan is provided at **Appendix 1.**

1.2 The site is 40.27 hectares (ha) and the land associated with this proposal comprises an area of previously undeveloped agricultural land and is located to the east of Cefn Road, Wrexham.

1.3 The northern edge of the site is bounded by Oakhurst and Thornleigh (Dol Ddraenen) to its north west. A historic woodland can be found south and southeast of the site. The east and south of the site are bounded by hedgerows and open fields. The site is publicly accessible and several Public Rights of Way (PROW's), including footpaths ABE/1 and ABE/2 run from east to west through the site.

1.4 The site is mostly open grassland with existing playing pitches to the west and arable agricultural land to the east and south. Woodland occupies a small portion of the site, towards the west. The existing playing pitches are linked to Ysgol Morgan LLwyd, a local secondary school located to the immediate west across Cefn Road. The surrounding areas around the site are largely characterised by existing residential dwellings, and community facilities.

1.5 The proposals comprise of a phased residential development for the construction of up to 900 residential dwellings with associated infrastructure (playing fields, open space and SUDs attenuation) with all matters reserved except for detailed means of primary highway access.

1.6 The assessments within this Environmental Statement ("ES") have demonstrated that the potential effects of the proposed development, sought for approval as part of this application, can be suitably mitigated to ensure a sustainable development can be delivered.

1.7 RJK Consulting Ltd has been commissioned by the Applicant to co-ordinate the Environmental Impact Assessment ("EIA") process and produce the ES for the proposed development. Specialist consultants have been appointed to investigate the environmental effects of the proposals.

1.8 This document is the Non-Technical Summary and is **Volume 1** of the ES. It has been prepared by RJK Consulting Ltd in accordance with the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. Further

information and detail regarding each of the assessments can be found in **ES Volume 2: Main Text** and **ES Volume 3: Appendices**.

2. Approach & EIA Methodology

2.1 An EIA predicts the positive and negative environmental impacts associated with a development proposal to provide the Local Planning Authority with sufficient information to make an informed decision on the granting of planning consent.

2.2 Once the need for EIA was established, a Scoping Report was prepared. A formal request for a Scoping Opinion was made to WCBC on 12th December 2023, accompanied by an EIA Scoping Report which set out those topics identified as requiring assessment through the EIA process in line with Schedule 4 of the EIA Regulations.

2.3 A formal Scoping Opinion was issued by WCBC on the 7th March 2024. In summary, the Council identified Agricultural Land and Minerals as the only topics to be 'scoped in' to the ES. However, numerous consultee responses received confirmed acceptance of the inclusion of the other topics listed below and the approach to each assessment. Although the inclusion of these topics goes beyond the request from WCBC, it is considered that the approach taken is the most robust to assess and mitigate any potentially significant effects. A copy of the EIA Scoping Report and a copy of the Scoping Opinion received from WCBC can be found in **ES Volume 3: Appendices**.

2.4 The scoping process concluded that there were potentially significant environmental effects in relation to the below topics and that these should be included in the EIA:

- Landscape and Visual
- Ecology and Nature Conservation
- Cultural Heritage
- Transport and Access
- Air Quality
- Noise
- Flood Risk and Drainage
- Agricultural Land
- Minerals

2.5 Cumulative effects were considered as part of the scoping process. In conjunction with WCBC, it was agreed that one cumulative scheme (Land South of Holt Road KSS2 North, P/2021/0436) would be included within the assessment. For further

information on cumulative effects, see **ES Volume 2: Main Text, Chapter 2 Approach** and each technical chapter where relevant.

2.6 Each environmental topic adopts the same approach to ensure consistency and the final results are presented to WCBC in a document referred to as an ES. The chapters assessing the environmental topics first establish the baseline conditions on the site before predicting the potential impacts during both the construction phase and the operational phase of development.

2.7 The EIA has identified and assessed the significance of potential environmental effects relating to the topics listed above. The assessment of 'significance' has been undertaken for all potential effects to determine their relative importance.

2.8 The type of effect can be adverse, negligible or beneficial; a brief description is provided below:

- **Adverse** - a negative impact on a sensitive receptor or the existing environment;
- **Negligible -** no discernible effect on a sensitive receptor or the existing environment; and
- **Beneficial -** a positive effect on a sensitive receptor or the existing environment.

2.9 In addition, the degree of significance can be minor, moderate or major; and a brief description is provided below:

- **Minor** - slight, short-term, or localised effect on a sensitive receptor or the existing environment;
- **Moderate** - a noticeable effect on a sensitive receptor or the existing environment; and
- **Major -** a substantial effect on a sensitive receptor or the existing environment.

2.10 When a significant adverse impact is identified as a result of the assessment process, then measures to avoid, reduce and, if possible, offset significant adverse environmental effects associated with the proposal are outlined within the assessment. These measures are referred to as mitigation. Embedded mitigation is measures which have been 'designed-in' to the proposed development to mitigate potential adverse environmental effects. Identifying and implementing mitigation measures is a key part of the EIA process and the residual impacts which remain after mitigation have been identified and their significance stated.

3. Site Description

Site Location

3.1 The land associated with this proposal comprises an area of previously undeveloped agricultural land and is located to the east of Cefn Road, Wrexham.

3.2 The northern edge of the site is bounded by Oakhurst and Thornleigh (Dol Ddraenen) to its north west. A historic woodland can be found south and southeast of the site. The east and south of the site are bounded by hedgerows and open fields. The site is publicly accessible and several Public Rights of Way (PROW's), including footpaths ABE/1 and ABE/2 run from east to west through the site.

3.3 The site is mostly open grassland with existing playing pitches to the west and arable agricultural land to the east and south. Woodland occupies a small portion of the site, towards the west. The existing playing pitches are linked to Ysgol Morgan LLwyd, a local secondary school located to the immediate west across Cefn Road.

3.4 The surrounding areas around the site are largely characterised by existing residential dwellings, and community facilities. To the north and west of the site are built up urban areas, comprised of detached, semi-detached and terraced properties.

3.5 The area adjacent to the west of the site also offers a range of services mainly within a small parade of retail premises including a convenience store, takeaway restaurants, pharmacy and hairdresser. Border Retail Park and an Asda Superstore are within a 25 minutes' walk from the site. A wider range of retail outlets are available in Wrexham town centre, 2km to the west, and on Wrexham Industrial Estate, 2.5km to the east.

3.6 Erlas Victorian Walled Garden is a community garden located adjacent to the site's north east limit. Acton Park is the closest large park, 2km north west of the site.

3.7 Queensway Sports Complex, home to the Wrexham Athletics Club and North Wales Crusaders rugby league club, is located 1.5km southwest of the site. Its facilities include: a swimming pool, gymnastics gymnasium, squash courts, 3G sport turf and athletics tracks and field.

3.8 Wrexham is served by two railway stations: Wrexham General Station and Wrexham Central Railway Station both located approximately 4km from the site. There are bus services that run through Hullah Lane and Sutton Drive, and to the north through Holt Road and St. Andrew Crescent.

Site Characteristics

3.9 The main environmental characteristics of the Site have been identified as follows:

- The Site in its current form is previously undeveloped agricultural land located to the east of Cefn Road, Wrexham.
- The site is accessible by a range of transport modes;
- The Site contains no rare, notable or unique landscape features and is not the subject of any statutory landscape designation which indicates that it is important at a national or regional scale.
- There are no watercourses on site and the site is located within Flood Zone 1;
- There are nine Grade II Listed Buildings within the 3km study area for heritage assets;
- The site is not within an Air Quality Management Area (AQMA);
- The environmental sound climate at and around the site is characterised by local and distant road traffic noise;
- Three non-statutory designated sites were located within 2 km of the site, including;
    - Cefn Park Local Wildlife Site (LWS)
    - Borras Bog LWS
    - Errdig Estate LWS
- The site includes 31.1ha of agricultural land, mostly best and most versatile (BMV) quality agricultural land Grades 2 and 3a; and
- The site is mainly underlain by Devensian Glaciofluvial Sheet Deposits, which comprise sands and gravels.

3.10 For further information relating to site description, see **ES Volume 2: Main Text, Chapter 3: Site Description**.

4. Alternatives

4.1 A statutory requirement for inclusion in an EIA is the reporting of the consideration of alternatives in the development of a proposal. This chapter describes the alternatives that were studied by the Applicant for the Proposed Development and the process of design evolution in response to the EIA process.

4.2 No alternative sites were considered by the Applicant, as the site is allocated for development in the LDP as part of the KSS2 allocation.

No Development Option

4.3 The EIA considered the implications of the development not coming forward, referred to as the 'do nothing' alternative. The do nothing alternative would be for the site to remain in its current state and is anticipated to remain as undeveloped land.

4.4 In the absence of the proposals, the baseline environment is not anticipated to change in the short term.

4.5 The site is situated within the KSS2 allocation for housing as outlined in the Adopted Local Development Plan (LDP). As such, it is recognised that although the baseline environment would not change in the short term significantly, in the longer term some form of development is likely to come forward on the site.

4.6 Although construction activities have the potential to increase the dust and noise in the local area, these will be controlled by best practice measures set out within a Construction Environment Management Plan ('CEMP') and will only be temporary effects on local receptors. In the absence of the Proposed Development, there will be no temporary disruption caused during the construction period.

4.7 Once complete, the Proposed Development offers new housing and new amenities in the local area. As a result, under the no development scenario the benefits associated with the Proposed Development would not be realised. Any potential adverse effects of the proposed development should be weighed against the benefits of the scheme including the provision of housing and new educational facilities within an allocated site. The Proposed Development also offers new greenspace, community infrastructure and recreational opportunities, with improved pedestrian and cycle access throughout. In the absence of the Proposed Development, these effects would not occur, and the site would remain in the current condition.

Design Evolution

4.8 The Applicant and the design team for the application have regularly liaised with WCBC in order to ensure that the design evolves to meet the aspirations for the site. The Applicant has also engaged with statutory consultees and the public. Further information relating to this can be found in the Planning Statement (J10-HE-PS-RevA, April 2024), which is submitted as part of the planning application.

4.9 The key points of design evolution are discussed within the Design and Access Statement (Tetratech, January 2025) prepared in support of the application and include the following:

- Utilities - A utility assessment identified a combined sewer that runs through the centre of the site from north to south, which requires a 12m easement either side. This easement restricts development but enables a green corridor to run centrally through the site.
- Drainage - The areas identified for attenuation basins have been developed following drainage assessments and infiltration testing. The basins are proposed within the site.

4.10 Considering these points, the design has evolved through an iterative process as well as responding to comments received from Officers during pre-application discussions. Although the masterplan is illustrative only and the exact layout is reserved for the detailed design stage, the shape and form of the proposals has been informed by the physical context of the site, emerging planning policy framework (local and national), along with a host of technical enviro-engineering influences such as drainage design and utilities as well as a landscape-led approach that emphasises retention of existing vegetation where possible.

5. The Proposed Development

5.1 The proposed development is defined on the planning application forms as:

''Outline Planning Application for Residential development for the construction of up to 900 residential dwellings with associated infrastructure (playing fields, open space and SUDs attenuation) with all matters reserved except for detailed means of primary highway access"

5.2 The application is submitted in outline for residential development and associated infrastructure. The development seeks outline permission for:

- Up to 900 residential dwellings and upto 2.5 storeys;
- Vehicular access points from Cefn Road;
- Playing fields;
- New hard and soft landscaping including tree planting; and
- Other associated works and infrastructure.

5.3 The assessment of effects is undertaken based on the Parameter Plan, which along with the written description of the Proposed Development, is the basis of the assessment within the EIA and allows the likely significant effects of the proposals to be fully assessed and appropriate mitigation measures secured. **Table 5.1** includes the list of plans that have been prepared and are submitted with the planning application. The full suite of plans can be viewed at **ES Volume 2a Main Text Figures**.

Table 5.1 Assessment Plans

EIA Plans	Purpose	Drawing Reference
Site Location Plan	Defines the extent of the site and the proposed development boundary.	784-B024030-TTE-00-XX-DR-UD-03-P05
Site Location Plan with Access	Defines the extent of the site and the proposed development boundary including access	784-B024030-TTE-00-XX-DR-UD-3D-P03
Parameter Plan	Defines the type of development permissible within the identified areas and the maximum height of development.	784-B024030-TTE-00-XX-DR-UD-23-P05
Phasing Plan	Defines the phasing of the development	784-B024030-TTE-00-XX-DR-UD-41-P04
Illustrative Masterplan	Demonstrates an indicative layout of the proposed development	784-B024030-TTE-00-XX-DR-UD-47-P03
Strategic Masterplan	Demonstrates indicative layout of the proposed development	784-B024030-TTE-00-XX-DR-UD-40-P05
Access	Proposed Arrangement along Cefn Road (overview)	VN232881-D100 Rev B
	Proposed Northern Access Arrangement	VN201792-D103 Rev B
	Proposed Access Arrangement Southern Parcel Primary Junction (Signals) & Secondary Junction (Priority)	VN232881-D101 Rev E
	A534 / B5100 (Greyhound Roundabout) Proposed Junction Improvement	VN232881-D201

5.4 The key elements of the Proposed Development are described below.

5.5 The housing mix, layout and scale are matters for determination at reserved matters. The planning application applies for upto 900 units and this is what has been assessed in the Environmental Statement.

5.6 The maximum heights and the developable area on site are the only parameters described which are submitted for approval at this time. All other information relating to scale, appearance, layout and landscaping is illustrative only and is reserved for the detailed design stage.

5.7 Primary vehicular access to the site is submitted in detail and will be via Cefn Road, making use of the site frontage along the eastern side of this road. Whilst the northern part of the site also has frontage with Bryn Estyn Road, it is not appropriate to form a vehicle access onto this road due to its more rural nature, however an emergency access point can be provided here.

5.8 Two primary points of access are proposed to serve the residential development– one at the northwestern end of the site and one at the south-western end of the site. A secondary southern access is also proposed to provide additional permeability and emergency access. There is also a new access proposed off Cefn Road to serve the proposed carpark for the playing pitches. The proposals allow for the provision of a link road connecting the site to the widerKSS2 site allocation to the north to provide connectivity as per the requirements of the Local Plan policy relating to KSS2.

5.9 The anticipated construction programme is as follows:

- Anticipated Commencement Date - Q2 2026
- Construction Duration - Up to 9 Years
- Completion – 2035

5.10 The application will implement a phasing strategy which will be divided into 2 phases.

- Phase 1 – up to 600 units (pre link road)
- Phase 2 – full development up to 900 units with link road (this includes everything in Phase 1 also)

5.11 A CEMP for the Site will be agreed with WCBC prior to construction, thereby ensuring that any potential environmental effects are within suitable standards or mitigated in accordance with measures identified through the EIA process, where no standards exist.

5.12 Further detailed information is provided **in ES Volume 2: Chapter 5 Proposed Development** and the accompanying Design and Access Statement (DAS) prepared by Tetratech submitted with the planning application.

6. Landscape and Visual

6.1 A Landscape and Visual Impact Assessment (LVIA) has been undertaken to assess the effects of the proposed development on the surrounding landscape and visual amenity in the local area during the construction and operational phases of development. The assessment was undertaken by Tyler Grange.

6.2 From a landscape and visual perspective, the Site contains no rare, notable or unique landscape features and would not be considered to represent a 'Valued Landscape' in terms of paragraph174a of the NPPF (2023). The Site is not the subject of any statutory landscape designation which indicates that it is important at a national or regional scale.

6.3 The Site is allocated for residential development (KSS2) within the adopted Wrexham Local Plan. Upon adoption of the Local Plan, land identified as part of the allocation was removed from land designated as Green Barrier. Therefore, the Site is no longer subject to this designation.

6.4 The valued attributes, elements and features of the Site which describe its landscape character are considered to be:

- Sloping topography towards the River Dee floodplain to the east;
- Sense of exposure on the top of the hill with long distance views eastwards towards Cheshire to the east and the Clwydian Hills to the west;
- Sense of settlement from the top of the hill as a result of the adjoining settlement edge and presence of Wrexham Industrial Estate in views across the countryside to the east of the Site;
- Hedgerows and Hedgerow Trees providing definition to the irregular landscape pattern; and
- Tree cover comprising Hedgerow Trees and the adjoining small woodland contributing to a sense of layering within the landscape.

6.5 To the north, the visual envelope comprises mostly short distance intervisibility which extends approximately 200m for the most part. Medium intervisibility also exists with a small number of residential dwellings including Firgrove Corner on elevated land within the settlement area to the north of the Site.

6.6 To the west, the visual envelope comprises short and long distance intervisibility. The visual envelope extends into the settlement but is constrained by the topography which slopes eastwards and by built form. Long distance intervisibility is afforded with elevated land beyond Wrexham on the slopes up to The Clwydian Range and Dee Valley AONB.

6.7 To the south, the visual envelope comprises short and medium distance intervisibility and extends across the adjoining farmland. Medium distance intervisibility potentially exists between the Site and Cefn Park Lodge which is constructed on a localised high point.

6.8 To the east, the visual envelope comprises short, medium and long distance intervisibility which extends over the fields adjoining the Site across the Dee floodplain towards the mid-Cheshire ridge.

6.9 Publicly accessible locations are present within The Clwydian Range and Dee Valley AONB which extends into the visual envelope. Photoviewpoint 20 was taken from a public-accessible location approximately 8.65km west of the Site within the AONB and is considered to represent the Site's context in views from the designation.

6.10 In considering the landscape and visual effects of development it is important to recognise that any change to an undeveloped (greenfield) site such as this site will result in landscape and visual effects. However, the extent of these effects should be considered within the local context and the proposals degree of conformance with their surroundings. In addition, the effects need to be put in the planning balance with all other economic, social and environmental effects of the development.

6.11 During the Construction Phase, the Proposed Development will introduce features and elements which are discordant with both the surrounding farmland and the adjoining townscape area. Due to the settled and industrial character of the wider landscape, views of construction activities are unlikely to form an unexpected component of views.

6.12 During the Operation Phase, the Proposed Development will not create nor result in greater than **Moderate Adverse** effects upon landscape character and views at Year 1. These worst-case effects are anticipated for the 'site-specific character and landscape features' and the 'Regional Landscape Character' but will be reduced to **Minor Adverse**, which is **not significant** for both receptors by Year 15. This is as a result of the mitigation planting maturing to enhance the GI components of the Site, softening perceptions of the scale and density of the development and improving the perceptual qualities of the retained and created landscape features and qualities.

6.13 During the Operation Phase, the Proposed Development will not result in greater than **Moderate Adverse** visual effects upon a small number of people. This level of effect will be experienced by people (i) using the PRoW Footpaths within the Site to be retained / diverted and (ii) residents to the north and west of the Site within the settlement. As the mitigation planting matures, these effects will be reduced to **Minor Adverse**, which is **not significant** by Year 15 and softened such that the PRoWs within the Site will follow attractive GI corridors and the Proposed

Development will appear as an integrated part of the existing settlement with a high level of tree canopy cover.

6.14 The Proposed Development is expected to have negligible effect upon the Clwydian Range and Dee Valley AONB and all but one of the existing/proposed revised Special Landscape Areas in the landscape surrounding Wrexham at both Year 1 and Year 15. A minor adverse effect is expected upon the SLA located c.165m south of the Site at Year 1 until the mitigation planting matures.

6.15 In terms of compliance with the relevant policies of the LDP2 2013-2028, it is apparent that through the formulation of the proposed Landscape Strategy that the Site can be progressed in a sensitive and appropriate manner. Where adverse effects arise, mitigation has been used to reduce the degree of harm and to provide a characteristic scheme that assimilates into the landscape and adjoining townscape character area.

7. Ecology

7.1 An ecology assessment has been undertaken to establish the likely significant effects of the Proposed Development on ecology and nature conservation within the site and surrounding area. This assessment was undertaken by Tyler Grange.

7.2 No national statutory designated sites were located within 2 km of the site. Three non-statutory designated sites were located within 2 km of the site, including;

- Cefn Park Local Wildlife Site (LWS)
- Borras Bog LWS
- Errdig Estate LWS

7.3 The site consists of grassland pasture and arable agricultural land with field boundaries including mature hedgerows and tree groups and a small area of mature woodland. Mature trees are found mostly along the phase 1 boundary

7.4 An ecological survey highlighted a number of badger setts across the sites which will require a 30m easement to guarantee the protection of the habitat. The locations of these setts are confidential.

7.5 The habitat plan identifies that bats are known to pass through the site having been sighted on the middle portion and to the south of the site, mostly between the site's western border and the existing woodland, and close to Wrexham Rugby Club.

7.6 The potential effects of the Proposed Development have been assessed through the completion of an Ecological Impact Assessment, the finding of which have been set out in this Ecology chapter for the Environmental Statement. The key findings are summarised below:

Statutory and non-statutory Nature Conservation Designations

7.7 A total of 4 statutory and 3 non-statutory nature conservation sites were noted within the Zone of Influence around the Proposed Development, the closest of which being Cefn Park Local Wildlife Site (LWS) located some 830 m south-east of the Site. An assessment relating to potential construction phase impacts on this and the other statutory sites and non-statutory sites identified that potential construction phase impacts could be mitigated through the production and implementation of a CEMP for the Site.

7.8 Potential effects on sensitive acid bog habitat occurring at Borras Bog LWS located approximately 1 km to the north of the Site, potentially arising from a possible increase the deposition of airborne sources of nitrogen N0x have been assessed as likely being negligible. This is a result of the existing impact of the neighbouring

A5156. However, this cannot be confirmed as it has not been specifically assessed to date. Impacts to other nature conservation designations containing nitrogen vulnerable habitats have been scoped out of the Air Quality assessment also undertaken for this EIA.

Habitats

7.9 None of the habitats within the Site were considered to be of greater than local ecological importance, of these hedgerows, ponds and broadleaved woodland are considered to be habitats of conservation concern under national or local biodiversity action. The pond, woodland and majority of the hedgerows, as well as the majority of the scattered trees will be retained through development.

7.10 The majority of habitat loss relates to arable land of negligible ecological importance, with some smaller scale losses of hedgerow sections and boundary trees for access. Habitat losses are to be mitigated through the creation of new habitats which will be included within the landscape design of the development. Retained habitat features would be protected during the construction phase through implementation of a CEMP, which will identify buffer zones for the protection of habitats, and well as pollution prevention measures.

7.11 Both retained and newly created habitats would be the subject of a Landscape and Ecological Management Plan (LEMP) which will ensure habitats are managed and protected from incidental disturbance and habitat degradation due to lack of maintenance during operation of the Proposed Development.

Protected and Notable Species

7.12 Potential effects relating to protected/notable species from development of the Site comprise:

7.13 Loss of terrestrial habitat and dispersal opportunities for GCN and other amphibians, further details of mitigation for habitat loss and to avoid killing / injury of GCN during the construction phase will need be provided and covered by an application for an EPS licence from NRW;

7.14 Potential disturbance to commuting / foraging routes for bats would be mitigated through provision of new hedges which will link to other features such as woodland and hedges beyond the Site boundary, as well as ecologically sensitive planting along the 20 m sewer easement running through the centre of the Site, to be kept as dark areas to promote their use by foraging and commuting bats. A series of bat boxes on retained trees will also be provided, together with a sensitive lighting strategy to maintain dark corridors with and surrounding the Site, improving habitat resources for bats locally. No loss of roost locations is predicted;

7.15 The provision of green infrastructure will maintain habitat resources for birds consisting of common woodland passerine species. Loss of potential nesting resources for lapwing arising as a result in the loss of arable land is not deemed to be significant, with further suitable habitat provided in the surrounding area;

7.16 A NRW badger licence will be required to close one outlier sett within the Site. All other setts, including two main setts on-site will be retained, protecting badger through development;

7.17 During operation of the Proposed Development, implementation of the LEMP will ensure habitats for protected species are maintained; and

7.18 Measures to prevent damage / disturbance to breeding birds, hedgehog and brown hare would also be set out in the CEMP.

8. Cultural Heritage

8.1 This chapter assesses the effects of the Proposed Development on archaeology and heritage. In particular it identifies and assesses the anticipated effects of change resulting from the Proposed Development on known and potential below ground archaeological remains within the site and existing built heritage in the wider area. This assessment was completed by Tetratech.

8.2 There are no designated heritage assets within the site boundary. There are no World Heritage Sites, Registered Battlefields, Registered Historic Parks or Gardens, Conservation Areas, or Scheduled Monuments within the 1km study area.

8.3 There are nine Grade II Listed Buildings within the 3km study area for heritage assets;

- Cefn Park (including attached stableyard range to N), early/mid-18th century Georgian mansion with later additions.
- 95 Dean Road
- Pavilion including attached Skittle Alley at Cefn Park
- Cefn Park Lodge, mid to late 19th century gate lodge to the Cefn Park Estate
- Gates and gate-piers at Cefn Park Lodge
- Ice-house to NW of Llwyn Onn Hall Hotel, late 18th or 19th century ice house, Llywyn Onn Hall Hotel
- No.93, Dean Road (W Side)
- The Lodge, Jeffreys Road (W Side)
- Cherry Hill, Borras Park Road (N Side)

8.4 The regional Historic Environment Record for Clwyd-Powys holds details for 154 recorded archaeological monuments and findspots (excluding designated assets), and 5 archaeological events, within the 1km study area.

8.5 The five archaeological events includes two HE1 assessments on Erlas Hall (51638) and Tyn Twll (51982), as well as a photographic survey at Tyn Twll Farm (129203). Archaeological evaluation was undertaken at Holt Road in 2020 (164331), with archaeological recording and monitoring in 2024 at 4 Oaklands Avenue (218129).

8.6 Evaluation at Holt Road (164331) took place 0.63km north-east from the proposed development. Investigations revealed prehistoric circular features, interpreted as pits and clamp ovens, as well as post-medieval pottery associated with the occupation of Bryn Estyn Court and a possible quarry feature. Archaeological

monitoring at 4 Oaklands Avenue (218129) is situated 0.48km north-west from the proposed development.

Heritage: Construction Phase

8.7 No residual effects are anticipated during the Construction Phase of the development. Due to the temporary nature of the works, any identified impacts are **Negligible** with a **Neutral** effect. The implementation of a CEMP, as additional mitigation, any identified impacts would remain **Negligible** with a **Neutral** effect (not significant).

Archaeology: Construction Phase

8.8 A number of non-designated assets have been identified across the site. Development has the potential to cause a **Substantial Negative** impact on known assets, consisting of several findspots, and Cefn Park Boundary stone (104513), however it is suggested that Home Farm Pond (55355) will be retained. These assets are currently considered to be of a low/ medium heritage value. The implementation of a watching brief to record the Cefn Park boundary stone (104513) prior to development reduces the Residual Impact Magnitude to **Moderate Negative** with a **Moderate/ Minor** effect (significant).

8.9 Home Farm Pond (55355) and its associated vegetation is to be retained as part of the proposed development; however, it is acknowledged that the wider setting of the asset will be changed due to the introduction of residential dwellings and associated infrastructure. No additional mitigation has been suggested to reduce the impact of development on the setting of the asset. However, the physical demarcation of the asset during construction works will seek to protect and maintain its integrity. As a result, the Residual Impact Magnitude reduces to **Slight Negative** resulting in a **Minor/ Neutral** effect (not significant).

8.10 A number of non-designated assets are findspots of metal finds within the site boundary, that have a low/medium heritage value. Subsequently, the implementation of a metal detecting survey around the sites of the assets and the rest of the site, will provide further data for addition to the archaeological record. As a result of their low/medium heritage value, the Residual Magnitude of Impact for these non-designated assets will reduce to **Moderate Negative** with a **Moderate/ Minor** effect (significant).

8.11 Additionally, the implementation of trial-trenched evaluation on site will help to establish the nature, extent and survival of archaeological remains below ground, which will in turn allow for engagement with CPAT. The heritage value of archaeological remains on the site is currently unknown, meaning that remains may retain a **medium** value. The implementation of a programme of archaeological evaluation will provide data to add to and support the archaeological record. As a result of their potentially high heritage significance, the Residual Magnitude of Impact for the unidentified archaeology on site is considered to be up to **Major/Moderate Negative,** with a **Moderate** significance of effect (significant).

Heritage: Operational Phase

8.12 The proposed development will change the historical context of Cefn Park Lodge (17273) and Gates and gate-piers at Cefn Park Lodge (17274) due to the relationship between the proposed development site and Cefn Park, and the impact of increased noise and lighting due to the proximity of the development and listed buildings.

8.13 With appropriate mitigation, including screening, height limitations, the retention of hedgerows within the site, and the use of building materials seen in the surrounding historic landscape, the magnitude of impact will be reduced from a **Moderate/Minor** significance of effect to a **Minor effect** (not significant).

8.14 It is determined that there will be **no significant effect** on the remaining receptors identified in this assessment.

Archaeology: Operational Phase

8.15 The proposed development will introduce a new building/ buildings and associated parking and landscaping. The new access road is likely to introduce lighting, vehicle noise and lights across the site.

8.16 Any archaeological remains identified during archaeological evaluation may provide opportunity to add public value to the scheme through the presentation of the site's archaeology to residents. In order to maximise this public benefit, the results of archaeological investigations should be considered for potential to promote appreciation and understanding of the site and its landscape context.

9. Traffic and Transport

9.1 A Traffic and Transport assessment has been undertaken to identify and assess the anticipated effects of change resulting from the Proposed Development on the existing traffic conditions in the local area.

9.2 Cefn Road forms the western boundary of the Site and forms a north-south route along the eastern side of Wrexham, providing access to the Caia Park residential area and providing connections for the A534 to the north and A525 to the south.

9.3 Bryn Estyn Road runs along the northern edge of the Site. It has the character of a rural lane and connects the Greyhound Roundabout in the west to the industrial estate to the east. It also provides access to the Erlas Victorian Walled Garden. To the east of the Walled Garden the road is closed to motor vehicles so the connection to the east is for cyclists and pedestrians only.

9.4 Pedestrian facilities in the vicinity of the Proposed Development include formal footways, shared footways/cycleways, and public rights of way (PRoW). Through the Site, two PRoW footpaths cross the northern area and a bridleway passes along the southern boundary of the Site.

9.5 The Proposed Development will not result in any significant adverse effects on the surrounding local highway network in either of the assessment scenarios.

9.6 The primary aspects of the development proposals relating to Transport and Access consist of:

- The traffic impact associated with the two assessment scenarios;
- Vehicular Access via new access roads and junctions off Cefn Road which will include pedestrian and cycle facilities;
- Linkages to proposed and existing pedestrian and cycle infrastructure within the vicinity of the Site; and
- An appropriately managed, planned and phased approach to the construction period.

9.7 There would be minimal increases in traffic flows in Wrexham and the surrounding areas as a result of the completed development with the highest increases expected to occur on the roads in the immediate vicinity of the Site access. Increases elsewhere would be less noticeable and generally confined to peak periods.

9.8 The proposed vehicular access points will provide a safe and efficient vehicular access arrangement. Pedestrian and cyclists will be accommodated with new dedicated crossing points on Cefn Road and on the main site access road. New

footway and cycleway infrastructure will be provided on Cefn Road and within the Site.

9.9 All construction traffic to and from the Proposed Development will be controlled by a routing agreement, which will prevent access via residential roads in the immediate vicinity of the Site. Further best practice measures will be implemented to minimise associated impacts of the construction phase. As such, impacts of the construction phase will be minor adverse on road users, pedestrians and cyclists during the short term only, and Not Significant.

9.10 Mitigation measures including hard measures, such as, the provision of walking and cycling routes within the Site and soft measures, such as, the provision of a Travel Plan to encourage sustainable modes of travel and a CEMP to minimise the impact during the construction phase will be implemented to ensure the residual effects of the development are Not Significant.

10. Air Quality

10.1 An air quality assessment has been undertaken to assesses the anticipated effects of change resulting from the Proposed Development on the air quality in the Assessment Study Area. This work has been undertaken by Miller Goodall.

10.2 There are currently no Air Quality Management Areas (AQMA) declared in North Wales.

10.3 WCBC monitors NO_2 using diffusion tubes at 26 locations, including one diffusion tube triplicate site which is co-located with an automatic monitoring station which is part of the Automatic Urban and Rural Network (AURN). The AURN site is located approximately 2.5 km southwest of the Proposed Development. Therefore, it is not representative of the conditions at the Proposed Development.

10.4 There are four NO_2 diffusion tube monitoring sites within 2 km of the Proposed Development. Monitoring results indicate that annual mean concentrations of NO_2 were below the NO_2 annual mean objective at the identified monitoring sites during 2018-2022. The results also indicate that the short-term objective for NO_2 was unlikely to be exceeded at the identified monitoring sites as monitored annual mean concentrations were well below the indicative screening concentration.

10.5 WCBC has one PM_{10} and $PM_{2.5}$ monitoring location. This is at the automatic station AURN. As discussed, this AURN is not representative of the conditions at the development site.

10.6 The impact of the Proposed Development on air quality is adverse at all receptors during Phase 1. However, the results of the road modelling assessment for 2026 indicate that annual mean concentrations of NO_2 and PM_{10} would be below the respective annual objectives as well as the $PM_{2.5}$ annual mean target, at all existing sensitive receptor locations within the study area, for both 'with' and 'without' the Proposed Development.

10.7 All of the receptors considered are of Negligible sensitivity. Predicted annual mean concentrations of NO_2, PM_{10} and $PM_{2.5}$ are expected to have an increase of less than 2.55% at all existing sensitive receptors assessed, i.e. the magnitude of change at all receptors is Negligible. The Proposed Development is therefore predicted to have a negligible impact on concentrations of NO_2, PM_{10} and $PM_{2.5}$ in 2026 at the selected receptors.

10.8 Overall, there is likely to be a **negligible** direct and permanent adverse effect on levels of NO_2, PM_{10} and $PM_{2.5}$ in the long term at a local level from road traffic emissions associated with the Proposed Development. The overall effect of the development on air quality is considered to be **Not Significant**.

11. Noise

11.1 An assessment has been undertaken to identify and assess the potential effects of noise and vibration impacts associated with the construction and operational phases. This assessment has been undertaken by Miller Goodall.

11.2 In general, the environmental sound climate at and around the site is characterised by local and distant road traffic noise, typical of a suburban semi-rural location. The dominant sources of distant road traffic noise across the site are Wrexham Road (A534) and the Llan-y-Pwll Link Road (A5156). In the vicinity of local road links considered within this chapter, road traffic noise from the closest road link becomes the dominant source.

11.3 Noise Sensitive Receptors (NSRs) are identified within the study area and include residential, school, outdoor amenity or sports facility receptors. The residential NSRs and Morgan Llwd School are considered to have high sensitivity. Erlas Gardd Furiog Fictoraidd and Clwb Rygi Wrecsam are considered to have low sensitivity.

11.4 An assessment of construction activity noise associated with the construction stage of the proposed development has been undertaken. The assessment indicates that the effects of construction activity noise at the closest residential receptors to the site will be **Significant**. However, these effects would be temporary, such that they would occur for a limited duration whilst intensive construction activities were undertaken in close proximity to the receptor.

11.5 An assessment of construction road traffic noise and operational road traffic noise associated with the construction and operational phases of the Proposed Development respectively, has been undertaken. The assessment indicates that the effects of construction road traffic noise and operational road traffic noise associated with the Proposed Development, on assessed receptors, will be **Not Significant**.

12. Flood Risk and Drainage

12.1 A flood risk assessment has been undertaken to consider the potential impacts on surface water quality, flood risk and drainage. Information contained in this chapter includes impacts in relation to the following:

- Flood risk;
- Surface water management;
- Groundwater quality; and
- Surface water quality

12.2 There are no watercourses present on the site and the site is in Flood Zone 1, which identifies the area as having a low probability of flooding.

12.3 Some areas of the site are naturally vulnerable to surface water flooding and have the possibility to flood due to extreme rainfall events. These areas are at the edge of the site and within the woodland at the centre of the site and therefore will have less impact on the design proposals.

12.4 An assessment has been undertaken of the potential impacts relating to the water environment for the proposed development at the site.

12.5 It has been demonstrated that a scheme can be developed which does not increase risk of flooding, both on and off site.

12.6 The development is sited within the catchment for the River Dee and Bala Lake Special Area of Conservation (SAC) and it has been demonstrated that there will be no adverse effects caused by the development.

12.7 Foul drainage connections into the public sewer will be subject to a S106 agreements with Welsh Water.

12.8 New foul drainage will be subject to S104 technical approval with Welsh Water.

12.9 Foul drainage will discharge into Five Fords wastewater treatment works via the existing 1050mm diameter combined sewer. This WwTW holds a phosphate consent.

12.10 The proposed drainage scheme does not present a risk to the surrounding SSSI areas due to their distance away from the site.

12.11 The proposed scheme implements a SuDS treatment train to improve water quality discharging to ground.

12.12 Embedded mitigation provided within the development includes; Location of the site, Site is not within a flood zone or a groundwater source protection zone. The site is a significant distance away from any SSSI, the drainage has been designed to limit impact on existing waterbodies and utilises multiple SuDS features to provide a surface water treatment train for surface water flows prior to discharge to ground Utilisation of the existing combined sewer and Five Fords treatment works for phosphate removal.

12.13 Further mitigation can be provided through the implementation and operation of a Construction and Environmental Management Plan by the principal contractor.

12.14 No significant effects are expected to the surface water and groundwater receptors following the mitigation measures noted in this ES chapter.

13. Agricultural Land

13.1 This chapter assesses the effects of the Proposed Development on agricultural land and describes the baseline conditions currently existing at the site, the potential direct and indirect effects of the development arising from the removal of land from agricultural use, the mitigation measures and the residual effects. It has been written by Reading Agricultural Consultants Ltd.

13.2 Agricultural land in Wales is graded between 1 and 5, depending on the extent to which physical or chemical characteristics impose long-term limitations on agricultural use. The Site extends to 40.27ha, including 31.1ha of agricultural land, which has been mostly classified as mostly best and most versatile (BMV) quality agricultural land Grades 2 and 3a.

13.3 The Proposed Development will involve the loss of 29.2ha of BMV agricultural land, which is assessed as a **moderate to major**, permanent adverse effect at the District level, which is **significant**. There are no measures available to mitigate this loss.

13.4 The effects on the soil resource can be mitigated by a Soil Resource Management Plan, which would reduce the effect on soil resources to a minor adverse effect in the long-term at the local level.

13.5 The Site forms part of the strategic housing site KSS2, which has been allocated in the adopted LDP in the full knowledge and understanding that a substantial area of BMV agricultural land would be lost from agricultural production, following a comprehensive assessment of agricultural land quality in the preparation of the LDP. The LDP has concluded that the harm caused by the loss of agricultural land is outweighed by the need to provide housing, infrastructure and other community facilities in sustainable locations.

14. Minerals

14.1 This chapter assesses the effects of the Proposed Development on minerals and describes the baseline conditions currently existing at the site, the potential direct and indirect effects of the development arising from the environment regarding minerals, the mitigation measures and the residual effects. It has been written by Tetratech.

14.2 The site is underlain by sand and gravels that WCBC describe to be of national importance. The minerals have been considered nationally important prior to any site investigation works and seems to be based on the broad BGS categorisation of glaciofluvial deposits being a Category 1 resource (see Prior Extraction Statement in Appendix 14.1 of the Environmental Statement).

14.3 Initial consultations with local mineral operators showed that one operator considered the deep level or targeted working (say to 3m or 4m) of the resource would likely not be commercially viable and the other operator stated the mineral was uneconomic as it's very fine, silty sands and clays. Both operators did however state that they would benefit from a more comprehensive scheme of minerals investigation, but this is regarding working the site to a much deeper level. The available site investigation information includes trial pits up to 2.5mbgl. WCBC have requested the assessment of mineral working to 3 or 4 mbgl. It is therefore considered that the available information provides a reasonable indication on the viability of working to this extent.

14.4 As the nationally important categorisation almost contradicts the information from the operators it is difficult to define the receptor sensitivity. The RTS 2nd Review does show that additional reserves are required in Wrexham.

14.5 It is proposed that an incidental extraction scheme to minerals is implemented at the site. The Prior Extraction Statement considers this to be the most suitable extraction option for this site, as it is heavily constrained and would likely not be commercially viable to work to any greater extent. The Prior Extraction Statement also explains that WCBC have already considered the KSS2 site against the policy criteria of MW1 and stated in July 2023:

'The need for the mineral underneath KSS2 has already been considered through the development of the LDP and it has been concluded that the need for the non-mineral development is considered to outweigh the need to protect the resource in its entirety. It is considered therefore that the inclusion of KSS2 within the LDP has already accepted that this sand would be sterilised by any development that comes forward to be proposed on KKS2, and that the need for the development would outweigh the permanent sterilisation of the sand resources beneath the site. As such, it is considered that the application complies with Policy MW1 ii) as it cannot be disputed that there is an overriding need for the proposed development.'

14.6 An incidental extraction scheme would recover a small portion of the resource.

14.7 On the basis that the resource is nationally important it is considered that a circa 867,000 tonnes sterilisation would be a **moderate to major significant adverse effect**. This is however on a low confidence level due to the doubts over the quality and demand of the underlying mineral.

14.8 The impacts would be long-term, permanent and of regional level. A regional level has been determined as it is considered 867,000 tonnes of sand and gravel would be important regionally but would not be significant on a national level.

14.9 WCBC acknowledge that sterilisation of mineral will occur. Paragraph 4.192 of the LDP states:-

'Due to the extent and distribution of mineral within the County Borough and the need for non-mineral development such as housing, it is inevitable that some sterilisation will occur and this is accepted and established through the allocation of sites underlain by mineral in the LDP.'

15. Summary and Conclusions

15.1 A comprehensive assessment of the potential effects of the construction and operational phases of the proposed development has been undertaken as part of this EIA to establish the environmental changes associated with the development. The Proposed Development has been designed in accordance with the findings and recommendations of the EIA. Any adverse effects identified through the assessment have been minimised as far as possible through the design process or the application of appropriate mitigation measures. Those effects associated with the construction activities will be controlled by the CEMP.

15.2 Effects during the construction period are predominantly **negligible** or **minor adverse** for the majority of assessments, which are considered **not significant**. Two **minor beneficial (not significant)** ecological impacts, which will continue once the development is operational, are anticipated for amphibians and bats, due to retention of key habitats including the on-site pond, sports pitches, the mature scattered trees and the vast majority of the hedgerows which will allow species to commute through the Site.

15.3 In terms of **significant** construction effects, there is one **moderate adverse** impact which is **significant,** relating to disturbance at residential noise sensitive receptors adjacent to the Site due to noise associated with on-site construction activities. However, construction related impacts of this type are considered temporary, short term and reversible.

15.4 In addition, during construction there is potential for **Moderate to minor adverse** effects (which are **significant**) on archaeological assets, consisting of several findspots and Cefn Park Boundary stone (104513), as well as potential to impact unidentified archaeology within the site boundary.

15.5 Two **moderate to major adverse** effects, which are **significant**, are expected in relation to loss of Agricultural Land and sterilisation of the Mineral resource.

15.6 The proposed development would result in the permanent loss of 31.1ha of agricultural land, of which 29.2ha is classified as best and most versatile (BMV) agricultural land in Grades 2 and Subgrade 3a. However, the Site forms part of the strategic housing site KSS2, which has been allocated in the adopted Local Development Plan (LDP) in the full knowledge and understanding that a substantial area of BMV agricultural land would be lost from agricultural production, following a comprehensive assessment of agricultural land quality in the preparation of the LDP. The LDP has concluded that the harm caused by the loss of agricultural land is outweighed by the need to provide housing, infrastructure and other community facilities in sustainable locations.

15.7 The mineral resource on site has been considered nationally important prior to any site investigation works and seems to be based on the broad British Geological Survey (BGS) categorisation of glaciofluvial deposits being a Category 1 resource. Although there are no development proposals for mineral extraction at the site, and it is not considered that a targeted minerals extraction to a depth of 3m or below would be viable, the development would sterilise the underlying mineral.

15.8 On the basis that the resource is nationally important it is considered that a circa 867,000 tonnes sterilisation would be a **moderate to major significant** adverse effect. This is however on a low confidence level due to the doubts over the quality and demand of the underlying mineral. The impacts would be long-term, permanent and of regional level. A regional level has been determined as it is considered 867,000 tonnes of sand and gravel would be important regionally but would not be significant on a national level. However, WCBC acknowledge that sterilisation of mineral will occur. Paragraph 4.192 of the LDP states:-

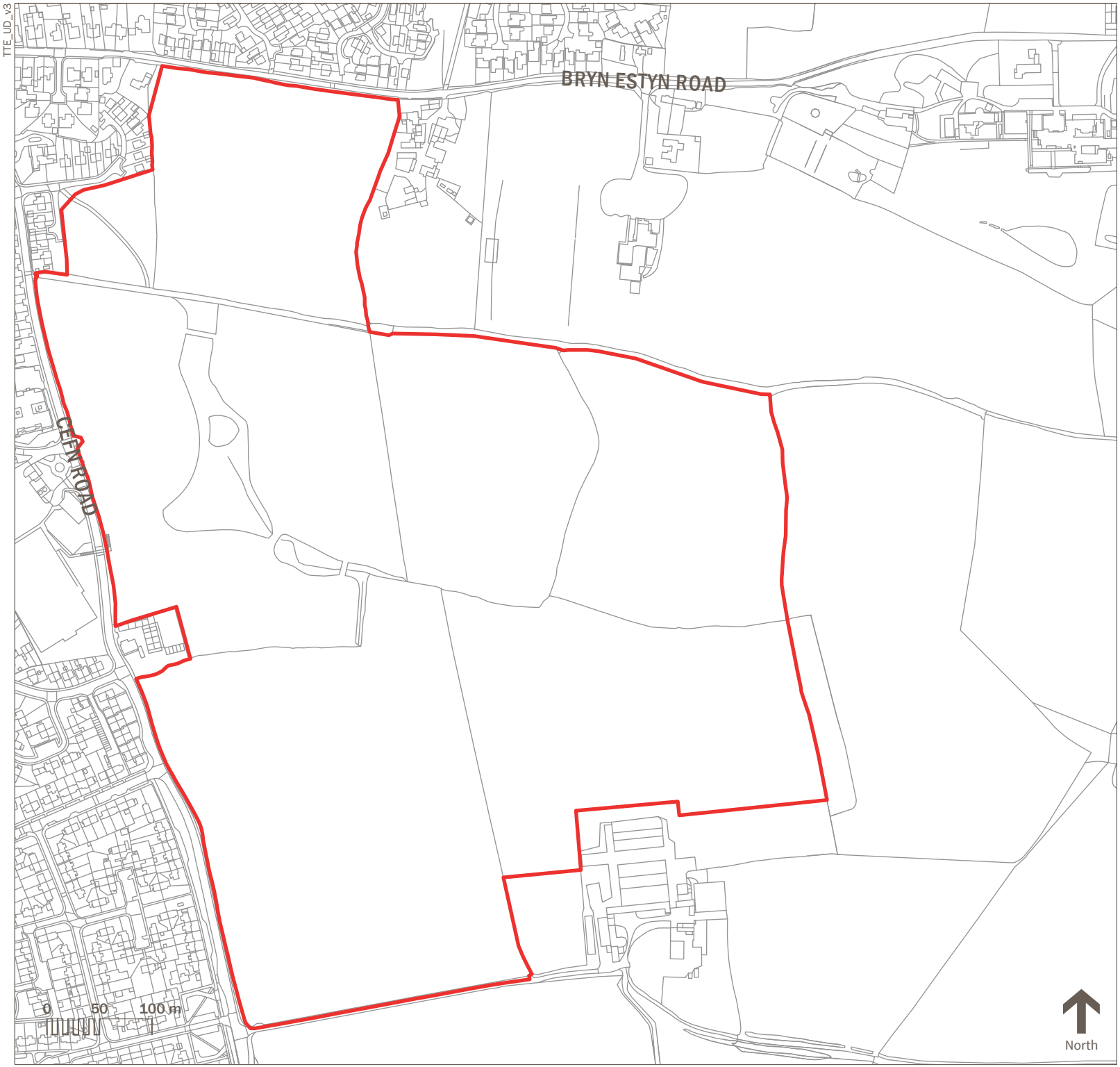
> *'Due to the extent and distribution of mineral within the County Borough and the need for non-mineral development such as housing, it is inevitable that some sterilisation will occur and this is accepted and established through the allocation of sites underlain by mineral in the LDP.'*

15.9 Outside of the impacts discussed above relating to agricultural land and minerals, the residual environmental impacts of the completed development with the implementation of mitigation measures range from **negligible** to **minor adverse**, all of which are **not significant**.

15.10 Although there are anticipated to be some significant adverse impacts as a result of the proposed development, it is important to weigh the potential direct and indirect benefits and improvements which will occur as a result of the proposals. The proposals comprise a high quality residential led development which offers new educational facilities, greenspace, community infrastructure and recreational opportunities and is in line with the strategic objectives of the Council as the site is within the KSS2 allocation.

Appendix 1 Site Location Plan

TTE_UD_v3



TETRA TECH

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Key

Site boundary (40.27 ha)

PRELIMINARY ISSUE

Document control

Rev	Description	Date	Dwn	Chk	App
P05	Amendments to site boundary following consultation	07.11.24	EI	EI	AC
P04	Amendments to site boundary	05.03.24	LR	BR	AC

Cefn Park Wrexham
Harworth Group

SITE BOUNDARY

TTE Proj No	Drwn / date	Ch'ked / date	Appr'd / date	Scale @ A4	Suitability
784-B024030	EI / Nov' 24	AC / Nov' 24	AC / Nov' 24	1:5000	-

Client Proj No	Origin	Vol/System	Level/Loc	Type/Code	Role	Drwg no	Rev
-	TTE	00	XX	DR	UD	03	P05

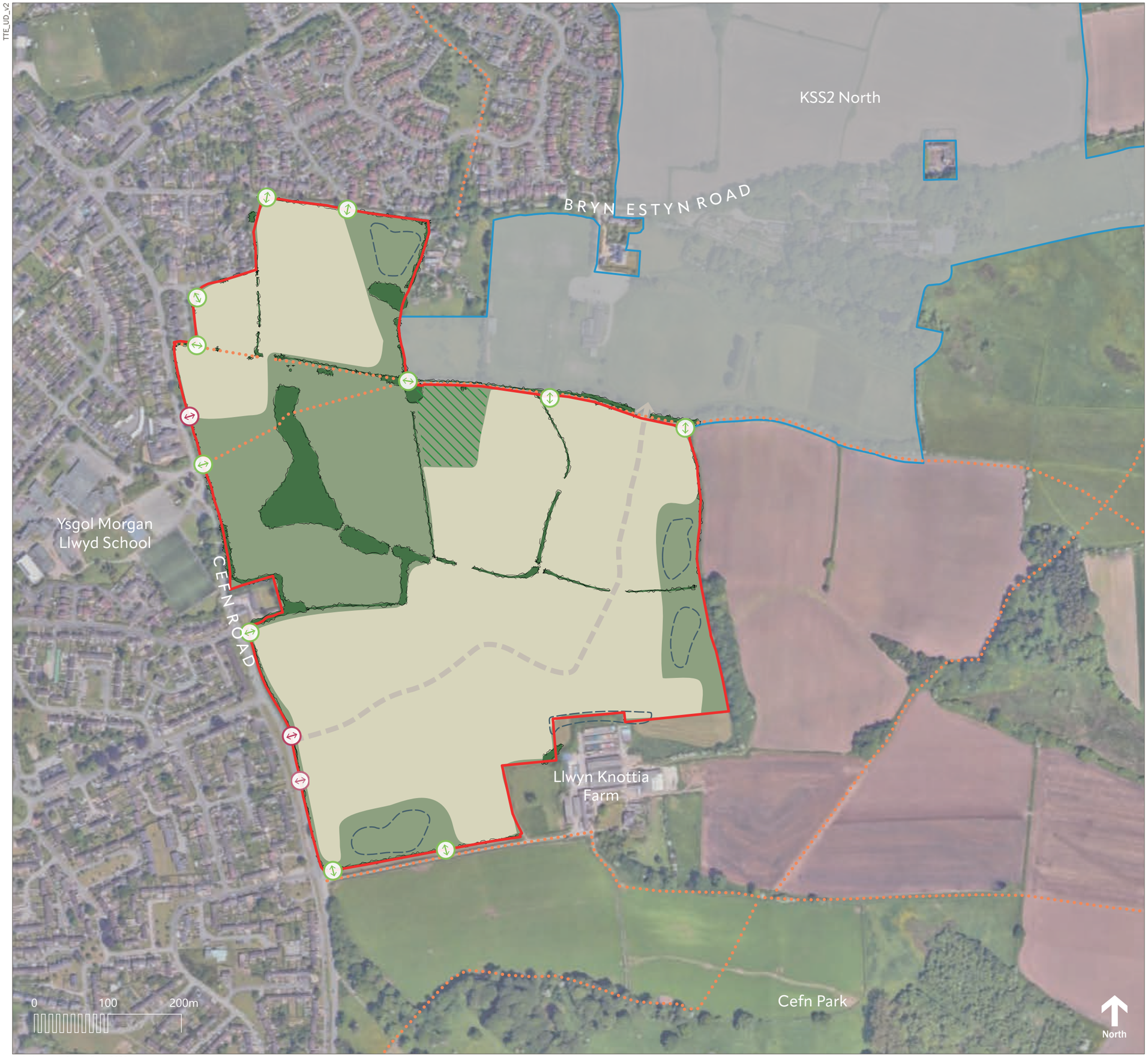
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Appendix 2 Parameter Plan

TTE_UD_v2



Aerial image: © Google Earth 2022

TETRA TECH

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KEY

- Planning application boundary
- KSS2 boundary
- Proposed residential use (C3), including up to 900 residential dwellings up to 3 storeys with associated infrastructure, open space and SuDS
- Proposed strategic spine road - alignment to be determined
- Proposed indicative SuDS ponds
- Retained trees / hedgerows showing root protection areas (RPA)
- Proposed primary vehicular access
- Proposed secondary / emergency access
- Proposed pedestrian / cycle access
- Retained Public Right of Way (PRoW)
- Proposed sports pitches
- New green space for sports pitch provision
- Open space outside development parcels

Document control

Rev	Description	Date	Dwn	Chk	App
P05	Amendments to attenuation ponds and red boundary	12.11.24	EI	AC	AC
P05	Amendments to attenuation ponds and red boundary	12.11.24	EI	AC	AC
P04	Amendments to attenuation ponds and red boundary	23.02.24	LA	BR	BR
P03	Updates according to new strategic masterplan	20.02.24	LA	BR	BR

Erlas Park Wrexham

Harworth Group

PARAMETER PLAN

TTE Proj No	Drwn | Date	Checked | Date	Appr'd | Date	Scale @ A3	Suitability
B024030	EI | Nov '24	AC | Nov '24	AC | Nov '24	1:5,000	S0

Client Proj No	Originator	Vol/System	Level/Location	Type/Code	Role	Number	Revision
-	TTE	00	XX	DR	UD	23	P05

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Appendix 3 Illustrative Masterplan

TTE_UD_v2



Aerial image: © Google Earth 2022

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KEY

Site boundary

Document control

P03	Amended in line with technical updates and client feedback.	22.01.25	EI	AC	AC
P02	Annotations added. Proposed pitches removed.	25.03.24	LR	AC	AC
P01	Initial issue	22.03.24	LR	AC	AC
Rev	Description	Date	Dwn	Chk	App

Erlas Park Wrexham

Harworth Group

ILLUSTRATIVE MASTERPLAN

TTE Proj No	Drwn | Date	Checked | Date	Appr'd | Date	Scale @ A3	Suitability
B024030	EI | Jan '25	AC | Jan '25	AC | Jan '25	1:5,000	S0
Client Proj No	**Originator**	**Vol/System**	**Level/Location**	**Type/Code**	**Role**	**Number**	**Revision**
-	TTE	00	XX	DR	UD	47	P03

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