PLANNING STATEMENT

Detailed planning application for a Proposed Green Eco-Heritage Zone and Single Employment Unit with integral offices, new vehicular access, car and HGV parking, servicing and storage, landscaping, heritage and ecology mitigation and ancillary development

"The Oaks Site," Oak Road, Wrexham Industrial Estate, Wrexham LL13 9RG

FI Real Estate Management Ltd

MAY 2025

DOCUMENT REFERENCE: FI034_01

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1 INTRODUCTION

1.1 This Planning Statement ("statement") supports the detailed planning application submitted to Wrexham Council by FI Real Estate Management Ltd ("FIREM") for a Proposed Green Eco-Heritage Zone and Single Employment Unit with integral offices, new vehicular access, car and HGV parking, servicing and storage, landscaping, heritage and ecology mitigation and ancillary development (the "Proposed Development"). The application site is on land to the south of Oak Road, Wrexham Industrial Estate, LL13 9RG; known locally as "The Oaks site."

Scope of statement

1.2 The scope of the statement is as follows:

- Section 2 provides background information on HIAB and FIREM.
- Section 3 sets out drivers for the planning application.
- Section 4 sets out whether alternative sites need to be considered.
- Section 5 describes The Oaks Site.
- Section 6 sets out the planning framework applying to the site.
- Section 7 describes the proposed development.
- Section 8 provides are reasons to scope our EIA
- Section 9 summarises pre-application advice provided by the council.
- Section 10 sets out benefits.
- Section 11 sets out our planning assessment of the proposed development.
- Section 12 sets out conclusions on the matters addressed by the statement.

2 ABOUT FIREM AND HIAB

FIREM

2.1 FIREM is one of the UK's largest commercial and employment property, asset management, development and construction companies. It manages assets totalling more than £1bn and in 2022 alone signed 102 property/lease deals following 108 deals in 2021.

2.2 The business controls more than 9.3 million sqm (10 million sq.ft.) of buildings and has extensive portfolios of land and development sites. It has plans to develop a further 4.2m sqm (4.5m sq.ft.) of commercial and employment floorspace.

2.3 The business, which also includes FI Facilities Management and FI Construction, has 1,062 tenants UK-wide and employs 300 people plus contractors. Tenants include the Department for Work and Pensions ("DWP"), IBM, NHS, EE, HSBC Bank, Zurich, RSA and American Express as well as hundreds of local businesses and independent traders.

HIAB

2.4 HIAB, the abbreviated version of Hydrauliska Industri AB was founded in 1944 in Hudiksvall, Sweden. In 1947 the company launched the world's first hydraulic truck-mounted crane. In 1949 Finnish company, Multilift, was set up to manufacture load handling equipment.

2.5 In 1977 the Partek Corporation purchased Multilift and in 1985 it bought HIAB. In the late 1990s this business restructured itself and made further acquisitions, In 2002 it was acquired by the Kone Corporation which in 2004 rebadged itself HIAB.

2.6 HIAB is a leading provider of smart and sustainable load handling solutions. It is an international company and currently operates in the UK, Sweden, Finland, Netherlands, Poland, Italy, Spain, France, Ireland, Brazil and South Korea. The business employs 4,000 people, working in 15 R&D sites, separate production sites and 62 service centres.

2.7 HIAB UK sells and services the firm's full range of products and currently employs 218 full time welders, fitters, engineers, finance, sales and servicing staff.

2.8 It currently operates from operational centres at Ellesmere in Shropshire, its current UK headquarters, Northallerton, Dudley and Cumbernauld (Scotland). It also operates from 23 approved service centres across UK and Ireland.

3 KEY DRIVERS FOR THE PROPOSED DEVELOPMENT

3.1 Key drivers for the proposed development initiative are as follows:

3.2 Green eco-heritage zone

3.3 The former development plan for Wrexham Industrial Estate ("WIE"), the Wrexham UDP, designated The Oaks Site as part of the wider defined area of WIE, where development for employment uses would be supported, subject to satisfying relevant polices of this plan.

3.4 The current development plan, the Wrexham LDP, which we cover in detail in section 6, designates the site as part of the WIE strategic ecological network. While this does not rule out employment development at the site, it is clear that the plan's preference for the site is something that can become part of or contribute towards delivery of the WIE strategic ecological network.

3.5 Headquarters and production unit for HIAB

3.6 HIAB has been at its current headquarters site at Gargotec Industrial Zone, off Elsdon Road/B5068, Elsdon, Ellesmere, Shropshire, for a period in excess of 20 years.



Figure 3-1: Cargotec Industrial Park, Ellesmere, Shropshire

3.7 Gargotec Industrial Zone is a long established and now dated historic industrial estate. We believe its origins lie in a former military depot established and operated during WW2 which was converted to industrial use in the late 1940s. The site is a multi-unit development. Most units are old and out dated. HIAB operates out of a number of units. Other units are occupied by firms not associated with HIAB.

3.8 Key issues with the current headquarters and production facility and which are driving HIAB's desire to relocate are as follows:

- Units and related facilities are old and outdated.
- Available floorspace cannot be grown.

- Profile of accommodation does not lend itself to modern production practices.
- Current accommodation does not contain modern, good quality offices.
- HIAB operation is on a shared site and security is an issue.
- Desire for market leading customer focused site with the ability to showcase HIAB products and skills, train new customers and develop relationships.

3.9 HIAB assessed other locations when considering relocating. 31 locations were investigated. The main list of possible locations was soon reduced to 4 as follows: Crewe, Warrington, Wolverhampton and Wrexham.

3.10 When carrying out its final and more detailed assessment of the 4 locations, HIAB took account of a wide range of business, geographic, site, economic and staff related criteria before coming to the decision that Wrexham was the best option. Key reasons for this are as follows:

- The site meets HIAB's brief for a high quality, high profile site that can deliver a new headquarters and production facility.
- The site is 14 km from HIAB's current headquarters at Ellesmere which contributes towards staff retention.
- Wrexham is well located to offer opportunities for HIAB to link with local colleges and universities on engineering initiatives and research opportunities.
- HIAB can link with other similar WIE based companies including JCB and Dhollandia etc.
- HIAB wishes to expand its staff. WIE is a well-known and long established employment site which is able to draw from a large skilled labour base living nearby.
- The Oaks Site also allows the creation of a large green eco-heritage zone which complements HIABs commitment to long term environmental objectives.
- The application site is far more accessible than the company's current base.

4 WHETHER ALTERNATIVE SITES NEED TO BE CONSIDERED

4.1 It is our position that the applicants do not need to consider whether a better alternative sites exists either at WIE, the wider Wrexham conurbation or elsewhere in the borough.

4.2 The key reason for this is that the proposed development delivers the allocation for the application site set out in the LDP, as detained in section 6, at the expense of only a small portion of the wider application site being brought forward for development. In essence, the proposed development delivers a high quality new green eco-heritage zone, specifically designed to deliver part of the WIE strategic ecological network, at the expense of only a small bespoke headquarters and production facility for HIAB.

4.3 Our conclusions on this are influenced by the following points and factors:

- The planning application site is owned by FIREM.
- HIAB approached FIREM to work with it to deliver a new headquarters and main production facility for it at WIE.
- HISAB's preferred option, driven by a desire for a bespoke development linked to a significant green / environmental zone was, and remains, The Oaks Site.
- The development plan for Wrexham, LDP, designates the application site as a site for an ecological facility that can become a functioning part of the envisaged WIE strategic ecological network.
- The LDP includes no specific proposals what this strategic ecological network might be, how it might be delivered, who or what will deliver it or how it will be paid for.
- The planning application by FIREM and HIAB is the first attempt to take on and deliver what the LDP expects and wants for The Oaks site by reference to how it designates it.
- The planning application encompasses all parts of The Oaks site. The vast majority of the proposed development, 82% in land take terms, seeks to deliver a high quality, sustainable green eco-heritage zone, which will deliver a significant, meaningful and high quality ecological facility, which will also utilise and enhance many of the site's heritage assets. In essence, this key element of the planning application delivers exactly what the LDP designates the site for. The residual 18% of the site will be used for the development of a new small discrete high quality and sustainable new headquarters and production facility for HIAB.
- The fact the planning application proposals are directly and inexorably linked to the planning application site, and directly and inexorably concerned with delivering what the site is designated for, as expected and required by LDP, means no other site could possibly deliver what the planning application and the proposed development intends or is designed to deliver. To suggest otherwise would simply be wrong and nonsensical.
- Accordingly, no alternative sites have to be considered.

4.4 Linked to the points made above, we can also confirm on behalf of HIAB, that, working with FIREM, that it singled out The Oaks Site as the optimum location for is new headquarters and production facility. It is not attracted to nor does it regard any other employment site in the borough as offering the same level of potential to meet its needs in the way The Oaks Site does. In the event its plans for The Oaks Site not succeed it will consider other options, most probably outside of the borough.

4.5 For the record, the other sites that the applicants considered are listed below (17 in total) and their locations identified on the plan that follows:

1. FIREM Site 5, WIE – site already committed for development for logistics for a different occupier.
2. FIREM Site 6, WIE – site too small but also affected by flood risk issues.
3. FIREM Kingmoor Site, WIE – site now has planning permission but being brought forward for large logistics units and planned for occupiers operating in this sector.
4. FIREM F Lloyd Site, WIE – site already developed and occupied/in.
5. Other small FIREM employment sites, including Dragon Packaging Site, WIE – all either occupied/in use or too small to meet occupier's needs.
6. FIREM land at Mainetti Works off Bedwell Road, WIE – already developed and in use / occupied.
7. Utopia development site off Industrial Estate Road, WIE – current planning application yet to be determined. Even if granted and the scheme comes forward, the nature of the scheme, which is mixed commercial/employment/complementary uses, is unattractive to the planned occupier.
8. Whitegates Industrial Estate, Queensway, Wrexham – site already developed and in use / fully occupied. Even if were to be promoted for redevelopment, the site's location, in the main urban area of Wrexham, does not meet occupier search criteria.
9. Land/industrial estate at former Rhostyllen Colliery, Colliery Road, off Wrexham Road, Wrexham – site is already largely developed but there could be scope for some new development / redevelopment of existing units but the overall site area, reflecting its history of use as a former colliery, is of a relatively poor quality, and as such does not meet the occupier's requirements for a quality site / location.
10. Commercial Zone to north of Wrexham Road, Rhostyllen, Wrexham – fully developed out and units are occupied and in use but even if a redevelopment plan were to be promoted, the site would be unlikely to meet the planned occupier's requirements by reference to the location and profile of the site.
11. Rhosddu Industrial Estate off New Road, Wrexham – this is a historic and well established and fully developed out industrial estate which offers limited scope for new development /

redevelopment of existing developments. In essence it is little different to where the occupier is currently based. It does not satisfy general location, quality and profile related elements of the planned occupier's search criteria.

12. Commercial Estate off Plas Acton Road, Wrexham – this is a small occupied commercial estate plus a small adjoining industrial estate. There appears to be no opportunity to accommodate the floorspace/development needs of the occupier. While there might be scope for new development on greenfield land to the west of the commercial estate, this area is too small to meet the site/floorspace/ancillary accommodation needs of the planned occupier.

13. Commercial Zone off Gresford Interchange, Wrexham – this is a developed and in use small employment estate off Gresford Interchange. It provides no scope for expansion or to meet the development needs of the planned occupier.

14. Cyfford Junction 4 LDP Allocation, Wrexham – this is an allocation in the LDP for employment. The site is not developed nor does it appear to benefit from any planning history which suggest it will be brought forward for development in the near future. We also understand that the preferred employment use would be offices which reflects the high-quality office development to the north east currently occupied by Moneypenny. Indeed, we understand the allocation was conceived and is expected to be an expansion of this development.

15. Llay Industrial Estate, Rackery Lane / Miner's Road at Llay, Wrexham – this is a well-established industrial estate that was developed on the site of the former Llay Colliery. In its current form it appears to offer no scope for new development nor do there appear to be any plans for redevelopment of existing units that might open up scope for a new unit of the profile required by the planned occupier, but generally the nature and profile of the estate, which reflects where the occupier is currently located, means it is a site/location that does not appeal to the occupier.

16. Five Crosses Industrial Estate off Ruthin Road, Minerva, Wrexham – this is also a long established historic industrial estate which in profile terms reflects that of the estate where the occupier is currently located. The subject estate appears to offer no scope for new development nor are there plans for redevelopment of any parts of the estate. Overall, this is not a location / development that meets the requirements of the planned occupier nor which generally appeals to it.

17. Coppi Industrial Estate off Hall Lane, Rhosllannerchrugog / Johnstown, Wrexham – this is a small, tight, well established industrial estate, which reflects in profile the estate where the occupier is currently located. It offers no scope for new development nor are there obvious opportunities for redevelopment. Overall, this estate does not appeal to the planned occupier nor meet its new development requirements.

4.6 ***Figure 4-1*** overpage identifies the location of each site.

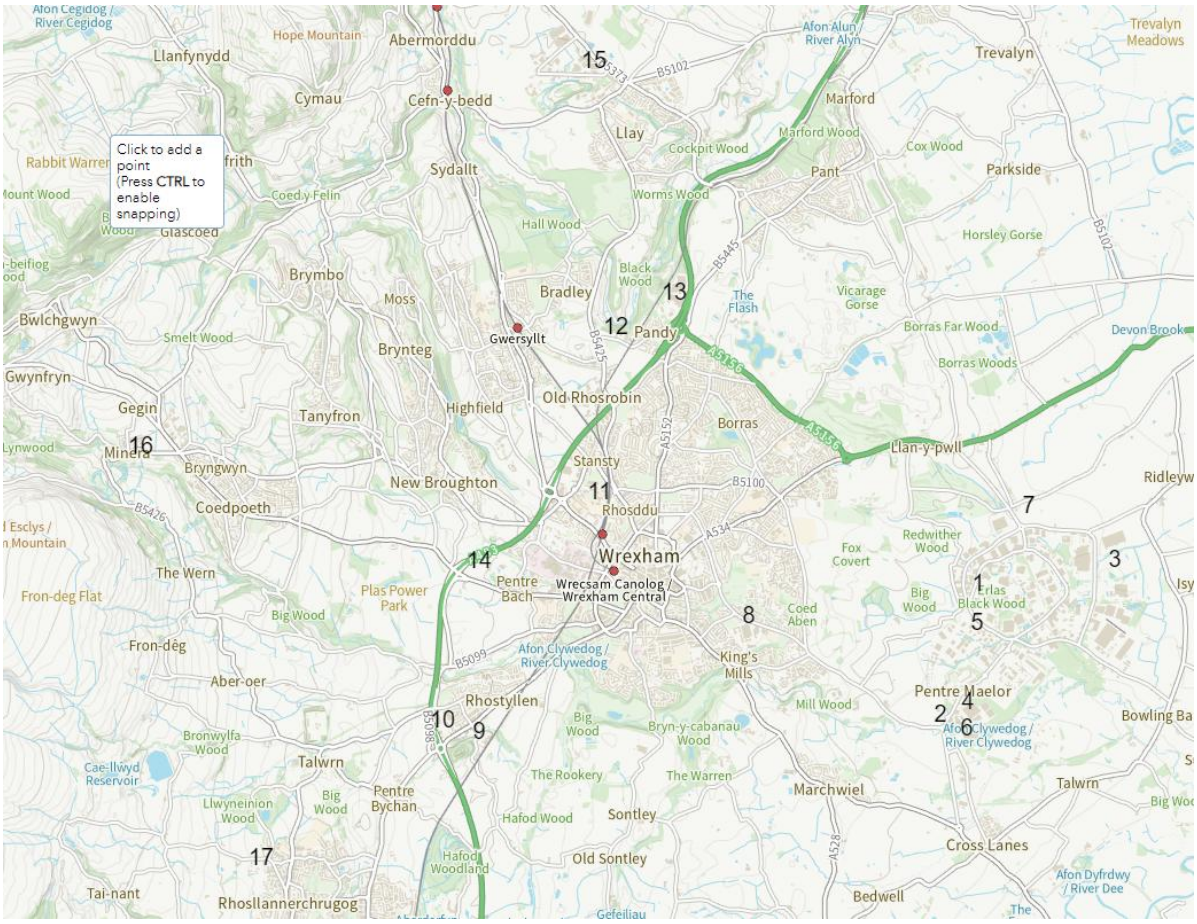


Figure 4-1: location of 17 alternative sites considered by FIREM/planned occupier

5 THE OAKS SITE

Location

5.1 The site is located in the south eastern part of WIE. Its address is The Oaks Site, Oak Road, Wrexham Industrial Estate, Wrexham, LL13 9RG. Its location is shown on ***Figure 5-1*** below.

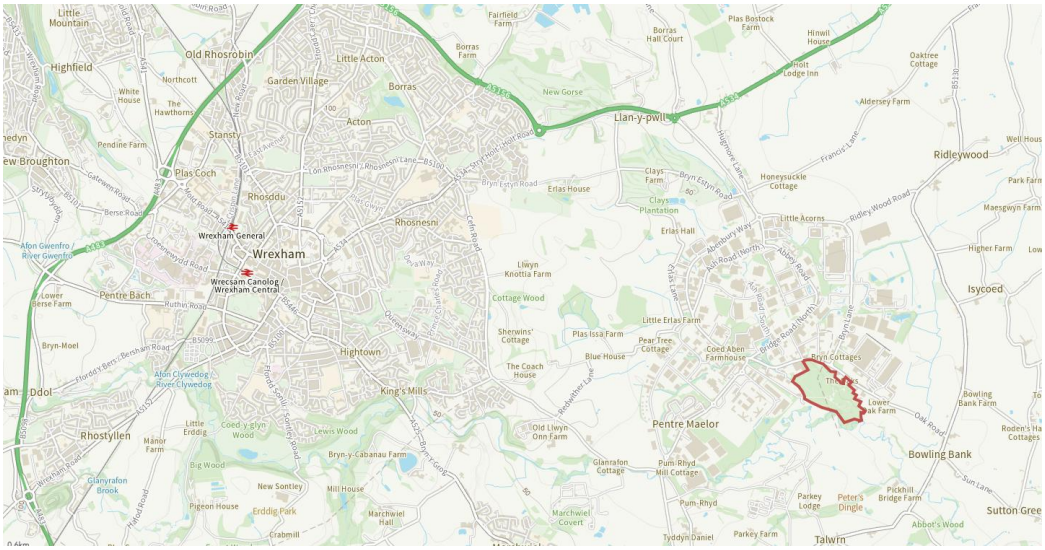


Figure 5-1 Site Location

Extent

5.2 The site extends to 21.6 ha. Its extent is shown on the plan at ***Figure 5-2*** overpage.

Historic profile

5.3 The Heritage Statement, prepared by Orion, sets out the history of the site in detail.

5.4 Its most recent history, i.e., WW2 to present day is the most relevant. The site former part of the extensive ROF Wrexham which was begun in 1939 and completed in 1941. This part of the ROF complex was involved in the manufacture and storage of cordite and TNT for use in munitions production. Hence the existence of a number of specialist manufacturing and storage buildings. For safety reasons, linked to the explosive nature of the substances produced and stored, the buildings that were constructed here were spread out and large amounts of safety zone/clear land were created between the individual buildings, which is typical of the design of second world war munitions factories.

Current profile

5.5 In 1949 ROF Wrexham was sold to the Board of Trade with the intention it be turned into an industrial estate which occurred. With the exception of the buildings described above, since 1949 no other development has occurred within the site. There has been development around the boundary fronting Oak Road and Redwither Road but this is out with the site.

5.6 Now the site is now unused and large parts of it have naturally re-vegetated and become overgrown and unkempt. Its current profile in terms of its ecology and arboriculture and related attributes are covered in detail in the ecology report by UES and tree report by MD Landscapes.

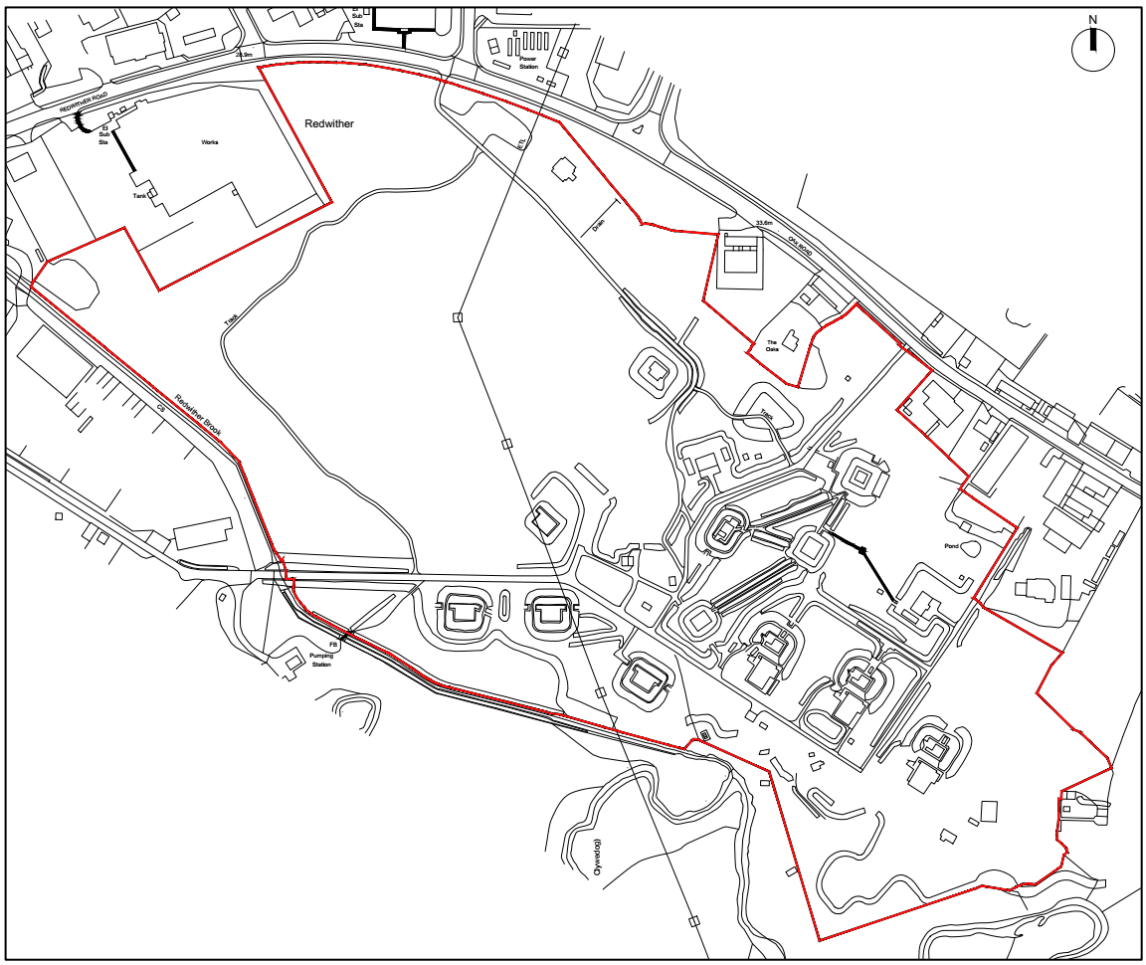


Figure 5-2 Site Location Plan (extract 1256-MCAU-P02-00-000 P1)

Access

5.7 Vehicular, pedestrian, cycle and public transport access to the site is possible off Oak Road.

Public right of ways

5.8 No PROWs cross the site. The nearest is ABE / 19 which is outside of and to the south west of the site.

Flood risk status

5.9 The site is at not at risk of flooding from rivers as set out in the Flood Consequence Assessment, prepared by Bradley Marshall. Land outside of the site to the south west and associated with the course of the River Clywedog and a small feeder tributary from the north west is at risk (low, medium and high depending on location). Small specific areas of the site might be susceptible to shallow surface water flooding but only in

time of high and consistent rainfall. The site is not at risk from flooding from the sea. This is shown on the following plan at ***Figure 5-3*** which is an extract from the NRW Flood Risk map of Wales.

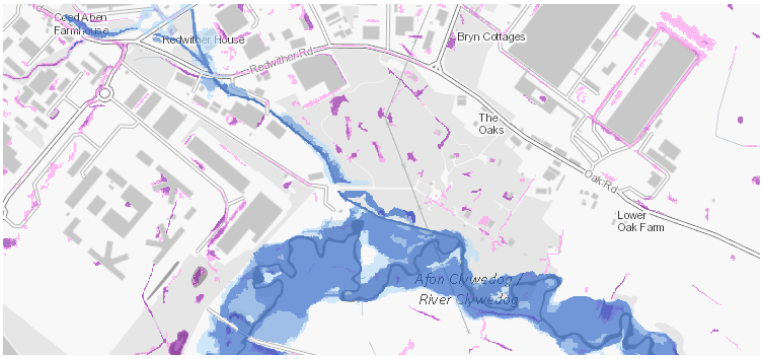


Figure 5-3 Flood Risk Map of Wales, extract

Planning history

5.10 The only application of interest is planning application ref no. P/2019/0877 by Cefn Zone Developments Ltd validated on 28 November 2019. The application was made in outline form for Use Class B1 light industrial and B2/B8 industrial units including means of access and layout, illustrative strategic landscaping, with ecological and heritage zones on land at Oak Road, Wrexham Industrial Estate, Wrexham, LL13 9RG.

5.11 In total some 21,700 sqm (233,513 sq.ft.) of industrial floorspace was proposed accessed off Oak Road. The parameters plan initially submitted with the application is illustrated in ***Figure 5-4***.



Figure 5-4 Extract from planning application ref no. P/2019/0877 Parameters Plan

5.12 The application was refused on 16th October 2020 by reference to the following grounds of refusal:

'1. Part of the site lies outside the Wrexham Industrial Estate Settlement Limit and comprises construction of new buildings for employment development. The proposal conflicts with UDP Policy E5. Insufficient information has

been submitted with the application to justify the principle of this part of the development outside the settlement limit.

2. The proposal would result in the loss of 7 no. TPO trees and result in harm to 2 no. further trees, conflicting with UDP Policies GDP1, EC4, LPG 17, WCBC Tree and Woodland Strategy, as well as the provisions set out in PPW. The justification put forward for the loss of and harm to these trees is not considered to be sufficient and there are no material considerations associated with the proposal to warrant departing from local plan policy in allowing approval of the proposal on this basis.

3. The application fails to demonstrate that the proposed development would not be detrimental to Great Crested Newts. Insufficient information is contained within the Management Plan to demonstrate that the mitigation area can be created, maintained and managed in perpetuity. The future management of the mitigation area is fundamental to whether the proposed development would be acceptable. To allow this development without this information would have a detrimental impact, contrary to Policies EC6 and GDP1 of the adopted Wrexham Unitary Development Plan, Local Planning Guidance Note 29 and Welsh Government TAN 5 Nature Conservation and Planning.

4. The application site is a designated Local Wildlife Site. Insufficient information has been submitted to demonstrate that the habitats and species at risk within the site, would be improved, enhanced and managed as part of the development proposal. In the absence of this information, it has not been demonstrated that the proposal complies with UDP Policies EC6 and GDP1, Local Planning Guidance Note 29 or TAN 5.'

5.13 The refusal was appealed in April 2021, appeal ref no. APP/H6955/A/21/3273101, to be dealt with through the informal hearing procedures. However, in March 2022, the appellant's agent (acting on the instructions of the appellant) requested that the appeal be withdrawn. This was confirmed as having been actioned by Planning and Environment Decisions Wales ("PEDW") on 22nd March 2022.

5.14 We consider this application and its refusal in more detail in section 11 when setting out our planning assessment of the current proposals.

Photographs of site

5.15 All photographs presented in ***Photograph 1*** to ***Photograph 5*** overpage are courtesy of © Google Earth aerial and street views.



Photograph 1 Aerial photograph of site



Photograph 2 Oblique aerial view across site looking northeast



Photograph 3 Oblique aerial view across site looking towards southwest



Photograph 4 Oak Road street view looking southwest



Photograph 5 Oak Road street view looking westwards

5.16 Further internal photographs are provided within ecology reports provided by UES providing more detail on the existing habitats.

6 PLANNING FRAMEWORK APPLYING TO THE SITE

6.1 The planning framework applying to the site is confirmed through pre-application advice provided by the council (letter dated 11/10/2024). This is summarised at section 8 of the statement. This confirms that the planning framework comprises:

- Wrexham Local Development Plan.
- Local planning guidance notes.
- Planning Policy Wales (including Technical Advice Notes).

Wrexham Local Development Plan ("LDP")

6.2 The LDP was adopted by Wrexham Council in December 2023, but the decision was subject to legal challenge and the Court of Appeal in December 2024 ruled that the Council was not legally obligated to adopt the plan; an appeal to the Supreme Court against the ruling was dismissed. The effect is the vote to adopt the LDP is nullified with a new vote anticipated during 2025. Currently, Wrexham Council states on its website that the LDP is the adopted Development Plan for development management purposes; as such we give full weight to the policies of the LDP until and unless the Council directs otherwise.

6.3 The LDP covers the period 2013 to 2028. Relevant policies identified through pre-application advice are as follows:

- Policy SP2: Location of Development.
- SP5: Planning.
- SP8: Economic Growth, Employment & Enterprise.
- SP9: Wrexham Industrial Estate.
- Policy SP12: Design Principles & Masterplanning.
- Policy SP14: Natural Environment.
- Policy SP15: Historic and Cultural.
- SP16: Minerals Supply and Safeguarding.
- Policy SP18: Climate Change.
- Policy SP19: Green Infrastructure.
- Policy EM2: Provision of Supporting Facilities for Employees in Business, Industrial and Warehousing.
- Policy EM4: Employment Development Outside of Settlement.
- Policy NE2: Local Designations for Nature Conservation and Geological Importance.
- NE3: Trees, Woodland and Hedgerows.

- NE6: Waste Water and Water Quality.
- Policy DM1: Development Management.
- Policy T1: Managing Transport.
- Policy MW1: Minerals Safeguarding

6.4 The policies plan of the LDP confirms that the site is designated as part of the WIE Strategic Ecological Network covered by Policy SP9 and Policy NE2 Local Designations for Nature Conservation and Geological Importance. The site's designation is illustrated through the following extracts from LDP Proposals Map and Constraints Map:

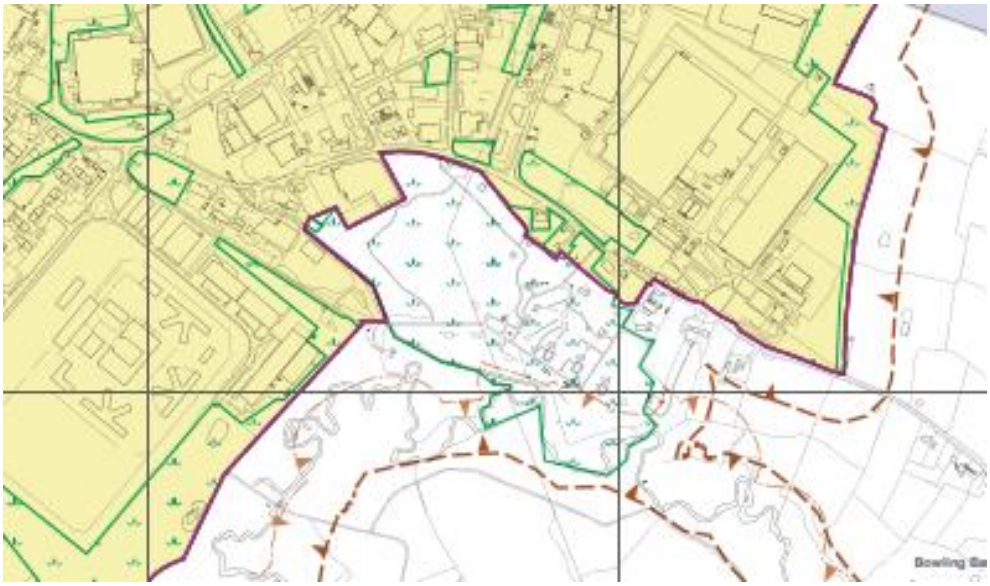


Figure 6-1 LDP Proposals Map Insert 3 extract



Figure 6-2 LDP Constraints Map Insert 3 extract

6.5 Local Planning Guidance Notes

6.6 Those considered relevant by the council and highlighted through pre-application advice are as follows:

6.7 LPG16: Parking.

6.8 LPGN17: Trees and development.

6.9 LPGN26: Landscape and Industrial Development.

6.10 LPGN32: Employment Development and Nature Conservation.

6.11 LPG32: Biodiversity and Development.

6.12 Planning Policy Wales

6.13 This is set out in Planning Policy Wales ("PPW") Edition 12 which was issued in February 2024. PPW is a comprehensive policy and guidance note on all aspects of planning and related land uses.

6.14 Key relevant guidance and policy on employment development and related topics, much summarised given the length of PPW, is as follows:

- Achieving well-being through placemaking - sustainable places are the goal of the land use planning system in Wales; they are the output of the planning system rather than the process of achieving them. All development decisions, either through development plans policy choices or individual development management decisions should seek to contribute towards the making of sustainable places and improved well-being.
- Maximising well-being and sustainable places through placemaking - placemaking considers the context, function and relationships between a development site and its wider surroundings. It applies to major developments and creating new places as well as smaller developments created within a wider place. Placemaking should not add additional cost to a development, but will require smart, multi-dimensional and innovative thinking to implement and should be considered at the earliest possible stage. The unique features and opportunities of a location including heritage, culture, language, built and natural physical attributes should be identified and responded to.
- Key planning principles – these cover growing the economy in a sustainable way; making best use of resources; facilitating accessible and healthy environments; creating and sustaining communities; maximising environmental protection and limiting environmental impact.
- Placemaking in Action – involves a range of initiatives and expectations including:
    - Good design – good design makes better places and planning should deliver good quality, well designed developments;

  - Promoting healthier places – planning should promote healthier places and communities and planning can play a role in delivery of this;
  - The Welsh Language and placemaking –support of the promotion of the Welsh Language and Welsh communities and the role of planning in delivering these objectives;
  - Sustainable management of natural resources – promotes the sustainable management of natural resources and sets out the role of planning in delivering this;
  - Strategic placemaking – this is an important component of the delivery of successful and sustainable development and all developments should have regard to this advice;
  - Spatial strategy and site search sequence – sets out the ideal spatial strategy and site search sequence so as to make the best use of land resources and ensure development has positive effects;
  - Accessibility - all development should be accessible and the emphasis should be on reducing trips and use of sustainable modes;
  - Previously developed land – sets out benefits of using previously developed land before greenfield land;
  - Supporting infrastructure – development should only be supported if it benefits from existing relevant infrastructure and, if not, necessary new infrastructure can be provided.

- Active and social places – development should contribute to promoting social, economic, environmental and cultural well-being by providing well-connected and cohesive communities
- Moving within and between places - the planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport
- Productive and enterprising places - productive and enterprising places are those which promote the economic, social, environmental and cultural well-being of the country by providing well-connected employment and sustainable economic development. These places are designed and sited to promote healthy lifestyles and tackle the climate emergency. This is done by making them: easy to walk and cycle to and around; accessible by public transport; minimising the use of non-renewable resources; and using renewable and low carbon energy sources.
- Economic infrastructure - the productive and enterprising places theme of planning policy covers economic development, physical infrastructure, energy and the efficient use of resources. It includes the development of land necessary for economic activity, including traditional office and industrial development, rural enterprise and tourism, and the transport infrastructure and communication systems necessary to make those developments sustainable and work effectively.
- Transportation infrastructure – the provision of sustainable transport infrastructure is essential in order to build prosperity, tackle the climate emergency, reduce airborne pollution and to improve the social, economic, environmental and cultural well-being of Wales. The planning system should

facilitate the delivery, decarbonisation and improvement of transport infrastructure in a way which reduces the need to travel, particularly by private vehicles, and facilitates and increases the use of active and sustainable transport.

- Economic development - for planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses. Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services. Economic land uses also include construction, energy, minerals, waste and telecommunications sectors which are also sensitive to planning policy.
- Reduce energy demand and use of energy efficiency - the planning system should support new development that has very high energy performance, support decarbonisation, tackle the causes of the climate emergency, and adapt to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures. The Welsh Government's policy is to secure zero carbon buildings while continuing to promote a range of low and zero carbon technologies as a means to achieve this. Sustainable building design principles should be integral to the design of new development.
- Making best use of material resources and promoting the circular economy - placemaking embraces the inter-relationships between the built and natural environment. Choices about the use of material resources should be based on making the most appropriate and sustainable use of finite resources and promoting the principles of a circular economy. A circular economy is one which aims to keep materials, products and components in use for as long as possible. There are environmental, social and economic benefits of taking such an approach, most notably the increased value and productivity of materials, financial savings for the construction sector and the prevention of waste. Through the adoption of circular economy principles, cost savings attributed to the waste hierarchy and effective waste management of over 2% of the project budget are possible.
- Recognising the special characteristics of places - the distinctive and natural places theme of planning policy topics covers historic environment, landscape, biodiversity, geodiversity and habitats, coastal characteristics, air quality, soundscape, water services, flooding and other environmental (surface and sub-surface) risks. The special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for historic, scenic, aesthetic and nature conservation reasons. These give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles.
- The historic environment - the planning system should look to protect and enhance the historic environment which is made up of individual historic features collectively known as historic assets (statutory designated assets and local assets). The ways in which historic assets are identified can vary. The most important assets have statutory protection or are included in formal registers which identify

them as being of special historic interest. Other assets yet to be formally identified could include buried archaeological remains.

- Green infrastructure - green infrastructure is the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales and some components, such as trees and woodland, are often universally present and function at all levels. Planning should protect and maximise the value of such assets.
- Biodiversity and ecological networks - the planning system has a key role to play in helping to reverse the decline in biodiversity and increase the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. Recognising that development needs to take place and some biodiversity may be impacted, the planning system should ensure that overall there is a net benefit for biodiversity and ecosystem resilience, resulting in enhanced well-being.
- Water and flood risk - as well as a direct requirement for life, well planned water services provide a range of benefits and services for society. The water industry itself is a source of green jobs and water services support energy and food production, recreation and tourism and connect homes and businesses to the infrastructure networks upon which they depend. As well as this existing natural ecosystems, green infrastructure features and nature-based solutions play an important role in providing water quality and flood management. Flood risk management is a critical role of planning and development should minimise scope for flood risk.
- Air quality and soundscape - clean air and an appropriate soundscape contribute to a positive experience of place as well as being necessary for public health, amenity and well-being. They are indicators of local environmental quality and integral qualities of place which should be protected through preventative or proactive action through the planning system. Conversely, air, noise and light pollution can have negative effects on people, biodiversity and the resilience of ecosystems and should be reduced as far as possible.
- Lighting - there is a need to balance the provision of lighting to enhance safety and security to help in the prevention of crime and to allow activities like sport and recreation to take place with the need to: protect the natural and historic environment including wildlife and features of the natural environment such as tranquillity; retain dark skies where appropriate; prevent glare and respect the amenity of neighbouring land uses; and reduce the carbon emissions associated with lighting.
- Unlocking potential by taking a de-risking approach - understanding the barriers to unlocking the potential of places, including the transformation or regeneration of an area or the development of a single site, is a key part of achieving sustainable places. Barriers could include dereliction or risks such as flooding, land contamination or instability. A de-risking approach, where the consideration of natural and human-made surface and subsurface hazards and environmental risks is factored in as an integral part of a better understanding of the characteristics of places, should be actively facilitated by

planning authorities, with the input of local authority Environment Health departments, whose assistance should be sought at the earliest stage.

6.15 PPW is supplemented by a number of technical advice notes (TANs) which remain applicable. Relevant TANs are listed below. As these are topic specific and technical in content, their key provisions are summarised in the technical reports of the consultants that have prepared related support documents in support of the planning application:

- TAN 5: Nature conservation and planning (September 2009).
- TAN12: Design (March 2016).
- TAN18: Transport (March 2008).

7 PROPOSED DEVELOPMENT

Key elements of the proposals

7.1 The proposed development comprises two key elements as follows:

- High quality green eco-heritage zone designed to deliver a wide range of environmental, ecology, BNG and heritage benefits so as to deliver the site's designation in the LDP.
- Small, discrete sustainable headquarters and production unit comprising assembly, manufacturing, warehousing elements and offices for HIAB which interacts and makes best use of the proposed green eco-heritage park.

7.2 We now consider in more detail each element of the overall development proposal

High quality green eco-heritage park

7.3 Key elements of the proposed high quality green eco-heritage zone are as follows:

- Of the total available site area, 22.2 ha (54.7 acres), the green eco-heritage park will dominate the site and utilise 18.4 ha (45 acres) of the available site area.
- Ecology elements will aim to preserve the existing locally listed heritage assets. We would stress that the area will extend to 18.4 ha (45 acres).
- Create a more open profile for this land – it is currently overgrown which impacts on its ecological value.
- Remove / manage bramble and invasive species.
- Foster / create habitats for at least four species of bat.
- Foster rabbit grazed short-sward grassland to support meadow-rue, pepper saxifrage, grass vetchling and dyer's greenweed.
- Retain significant buildings, storage facilities and access tracks. Other features to be retained include a former concrete water storage tank built in the 1940s which has now filled with aquatic vegetation. Nowadays the tank function as a wildlife pond and contains good populations of great crested newts, an internationally protected amphibian.
- A main badger sett will also be retained in perpetuity.
- Dense scrub is now the most abundant habitat on site which supports a significant assemblage of breeding birds with at least 20 songbird species present. This is to be managed.
- Create habitats to support rare invertebrates that are found in areas of previously disturbed ground and open grasslands. Species include Clouded Daisy Fly (*oxyna nebulosa*), a spider-hunting wasp (*priocnemis exaltata*) and Red-Girdled Mining Bee (*andrena labiata*).

- The green eco-heritage zone will be sensitive, sustainable, proportionate and targeted to maximise the potential of its future biodiversity value.
- Proposals will also seek to recover and enhance some of the irreplaceable open-mosaic habitats which have significantly declined due to the successional process of scrub encroachment. Full details of the green eco-zone will be worked up in discussion with the council's team of ecologists.

7.4 Delivery and management of the facility controlled through any grant of planning permission (by planning conditions and obligations in a s106 agreement). It is planned that the facility, as with other similar FIREM ecology initiatives at WIE, will be manged by a local wildlife organisation, with the agreement of this organisation, FIREM and the council.

Headquarters and production facility for HIAB

7.5 Main elements of the proposed small discrete headquarters development are as follows:

- Discrete development site for headquarters facility on only 3.6 ha (9 acres) of the overall site.
- Main assembly/manufacturing/warehouse unit.
- Integral offices.
- Internal welfare facilities.
- External caged storage area.
- Fenced test area.
- Separate vehicular access and egress off Oak Road.
- Circulation roads.
- Car parking.
- HGV parking.
- EVCPs.
- Yard areas and unloading/loading bays.
- High quality but discrete means of enclosure.
- High quality drainage/SUDS system.
- Retention of most mature trees on site and new tree planting and landscaping.

Layout of the proposed development

7.6 The proposed layout of the development is illustrated in ***Figure 7-1*** overpage.



Figure 7-1 Extract Landscape Masterplan 311/LAND/100 P02, MD Landscape

Floorspace, height and car parking details

7.7 Details are set out in below in Table 7-1.

Table 7-1 Floorspace and car parking details

Floorspace		
Description/Use	***SQM***	***SQ.FT.***
Total floorspace main unit (with integral offices)	7,179	77,276
Parking		
Car parking standard spaces	77	
Car parking disabled	5	
HGV spaces	70	
Cycles parking	10 spaces	
EVCPs	10	
Unit heights		
To haunch	10 m	
To ridge	12 m	

Appearance and design

7.8 The unit will be contemporary in terms of architectural style and the colour of the cladding system is likely to follow the corporate colours of the planned occupier.

Drainage

7.9 The site/development will include a high-quality drainage system which will follow the principles of a SUDS system which will deal with foul and surface water subject to further discussions with NRW and WW on scope of design and details of design.

Landscaping and tree planting

7.10 The entire development will be landscaped to a high standard which will involve new tree planting, replacement tree planting, shrub and low-level planting and associated works.

8 EIA SCREENING

8.1 The scale and nature of the development proposals fall within the scope of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (the "EIA Regulations"). By reference to the EIA Regulations and guidance in Welsh Circular 11/99 it is considered that the proposals do not need to be subject to an Environmental Impact Assessment. Our reasons are as follows:

- The application proposals do not fall within any Schedule 1 development criteria.
- The application site extends to approximately 21.6 hectares, and approximately 4.04 hectares will accommodate the proposed industrial unit, with the larger residual area containing the Green Eco-Heritage Zone and sustainable urban drainage features connected with the industrial unit. By reference to EIA Regulations, Schedule 2, paragraph 10(a) Industrial Estate Projects, the proposal for the industrial unit falls below the 5 hectare threshold and the Green Eco-Heritage Zone does not fall within any other categories set out in paragraph 10(b) to 10(p). The proposals do not fall into any other category of works under Schedule 2.

8.2 Through the making of the planning application we seek the Local Planning Authority to undertake a screening opinion under EIA Regulation 8(2). We consider that the extent of the application submission documentation and evidence should be sufficient to undertake the screening opinion, but will respond to any request under Regulation 6(2) made.

9 PRE-APPLICATION ADVICE

9.1 The applicant sought formal pre-application advice on the proposed development from the officers of the council.

9.2 This involved the following:

- Application for formal pre-application advice supported by pre-app planning statement, pre-app DAS, site plan, proposed layout plan and related information on HIAB and the site.
- Formal response from the council in letter dated 11/10/224.

9.3 A summary of feedback provided below. A copy of the full advice is provided as Appendix 3 to PAC Report, reference FI034_02:

- Relevant planning framework including policies of LDP
- Planning history of the site.
- Principle of development – no in principle policy support for the proposed development nor in accordance with the LDP.
- Employment land / development – already a sufficient supply.
- Ecology and Biodiversity Net Benefit - whilst the creation of an 'Eco-Heritage Zone' is considered positive in principle, in the absence of any survey / assessment information regarding the current status and value of the site, and in the absence of any details regarding the make-up, design and nature of this zone, it is not possible to say with any certainty whether or not this would be viewed as sufficient mitigation, restoration and management of the site to such an extent that overcomes the overall concerns with the loss of this habitat and Wildlife Site.
- Trees – Arboriculture / tree report needed as will a detailed landscaping scheme.
- Highways impacts – Further consideration needed but no immediate concerns raised by Highway Authority and a transport report / assessment required in support of application
- Sustainable transport – sustainable transport links and measures need to be considered and promoted.
- Flood risk – No FRA provided so cannot comment in detail. FRA needed and also Flood Consequence Assessment and also SAB approval for the scheme if it were to proceed.
- Waste collection – needs to be taken into account and a waste management strategy needs to be provided.
- Air quality – no concerns raised at this stage. An AQR needed with application. EVCPs needed as part of application proposals.
- Land contamination – Ground Investigation and Remedial Measures Investigation Assessment needed in support of the application. For clarity the assessment is likely to require the following elements: identification of any remedial measures required to deal with any hazards identified; a Remediation

Strategy (where necessary), including remediation options appraisal; and a verification plan and report.

- Sand and gravel safeguarding area - part of the proposal site lies within a Sand and Gravel Safeguarding Area, where LDP policies SP16 and MW1 apply. Policy SP16 protects such mineral from unnecessary sterilisation, unless the requirements of policy MW1 can be met where it can be demonstrated that:
    - i. the mineral does not merit extraction;
    - ii. the need for the development outweighs the need to protect the mineral;
    - iii. the mineral can be extracted before development commences;
    - iv. the development is temporary in nature;
    - v. infrastructure for the supply of the mineral would not be compromised
- Benefits of development – list of benefits extensive but could be delivered elsewhere on other employment land.
- Conclusion - in conclusion, at the present time we do not believe that a departure application for the development of this site as you have proposed would be justified, neither do I consider you have demonstrated that such a decision would be warranted. As such, whilst this does not prohibit you from progressing with the submission of a future application, we must advice you that any such proposal is considered unlikely to receive officer support – although the final judgement and decision would need to be made by the Members of the Wrexham Planning Committee as a major application.

9.4 Submission requirements – these are as follows:

- Completed Application Form;
- Location Plan;
- Site Plan;
- Existing Plans;
- Proposed plans including layout, elevations, section and levels;
- Sewerage Line Mapping;
- Landscape Scheme – hard and soft details, including a planting plan;
- Biodiversity Matrix and mitigation measures to demonstrate Biodiversity Net Benefit;
- Drainage Strategy;
- Flood Risk Assessment;
- Flood Consequence Assessment;
- Ecological Appraisal;

- Design and Access Statement;
- Planning Statement;
- Waste management strategy;
- Air Quality Assessment;
- Land Contamination Assessment and Remedial Measures Report;
- Tree survey and Arboricultural Impact Assessment;
- Construction Environmental Management Plan;
    - Construction Surface Water Drainage Management Plan;
    - Transport Statement and Travel Plan
    - Service Parking management Plan
- EIA screening opinion – recommended

10 BENEFITS OF THE PROPOSED DEVELOPMENT

New guaranteed future for site

10.1 It is our view that, in the absence of the proposed development, the application site has an uncertain future. It is designed as forming part of the WIE strategic ecological network in the WLDP, but this is absent of any specific plans or proposals as to how this will be delivered, maintained nor managed.

10.2 Currently, the site is land that is current formally unused in the sense that it is not in beneficial use as it once was when it formed part of the historic munitions factory that was operated at WIE (see section 7). Indeed, it is land that is regularly trespassed on and used for informal but unauthorised dog walking and some anti-social activities. In the absence of the proposed development there is no prospect it will be improved, promoted and managed as a high quality ecology and heritage asset.

10.3 In essence, the planning application and the proposed development it seeks planning permission for will transform the site from what it is now to a high quality local ecology and heritage resource and provide a new guaranteed future for the site.

Wholesale improvements to site

10.4 The site will be improved in a way that, in the absence of this planning application, can simply not be contemplated. It will be improved in a very impressive and wholesale way. It will go from being an unused liability to a high quality managed resource.

Management of site

10.5 The proposed improvements to the site, namely the green elements of the planning application, i.e., the eco-heritage park, will be delivered through a combination of planning conditions and legal agreement, the latter of which offers potential for the long term retention and management of the green elements of the proposed development for a period up to 30 years.

Profile building

10.6 Having a high quality renowned company like HIAB at WIE, like the other truly international companies at WIE, will contribute to profile building of the estate and the fact that Wrexham is a fantastic place to set up in and to do business in.

Employment

10.7 The new HIAB headquarters operation will see the transfer of approximately 140 jobs to the new facility. The business also plans to take on additional staff. Numbers have yet to be confirmed. But positions and skills are as follows:

- Management/Leadership positions Team Leaders/Supervisor Workshop Engineers
- Application Engineers

- Technical Engineers Parts & Logistic Service Controllers
- Sales & Key Account Management
- Health & Safety Quality Finance
- Human Resource
- IT

10.8 There is also scope for training and apprenticeships as follows:

- Workshop Engineer Apprenticeships - opportunity to become skilled at installation of Hiab products working towards a level 3 Engineering Technician Apprenticeship
- Field Service Engineer Apprenticeships - opportunity to become skilled in fault find, maintain, service and repair along with working on mechanical, electrical and hydraulic systems
- Application Engineer Apprenticeships - opportunity to become a skilled application/design engineer working towards Mechanical Engineering qualifications

Social values

10.9 FIREM has experience of working with councils like Wrexham Council, working with its partners, to deliver a wide range of high quality social values. These can be delivered through a social values delivery plan which FIREM, with HIAB, would be prepared to agree to. These would apply over the constructed stages of the project and once HIAB is operational.

Ecology, BNG and heritage benefits

10.10 Ecology and BNG benefits are as follows:

- Preserve of the existing locally listed heritage assets.
- Recording and opening up of locally listed heritage assets.
- Preservation and improvement of priority habitats including woodland, dense scrub and flower rich-grasslands.
- Better interaction with River Clywedog which borders the site to the south adding increased biological value and morphological interest.
- Clearing of bramble and willow at original munitions buildings to the east of development site to support four species of bats / colonies.
- Improvements to rabbit grazed short-sward grassland.
- Improved habitats to facilitate notable botanical species including meadow-rue, pepper saxifrage, grass vetchling and dyer's greenweed.

- Retention of former concrete water storage tank built in the 1940s which has now filled with aquatic vegetation as it functions as a wildlife pond which contains good populations of great crested newts.
- Retention of an identified badger sett in perpetuity.
- Dense scrub to be retained but managed to support a significant assemblage of breeding birds with at least 20 songbird species present.
- Rare invertebrates found in areas of previously disturbed ground and open grasslands to be supported. Species include Clouded Daisy Fly (*oxyna nebulosa*), a spider-hunting wasp (*priocnemis exaltata*) and Red-Girdled Mining Bee (*andrena labiata*).

11 PLANNING ASSESSMENT

Approach

11.1 In Wales, decisions on planning applications, by reference to Section 38(6) of the Planning and Compulsory Purchase Act 2004 as amended by the Planning (Wales) Act 2015, must be made in accordance with the development plan unless material planning considerations indicate otherwise.

11.2 Material planning considerations include Planning Policy Wales and Technical Advice Notes (TANs). They also cover usual planning, development, land use and site related matters of relevance.

11.3 Those who take decisions on planning applications have to interpret planning policy as written and come to a clear and coherent conclusion regarding how much emphasis to place on material planning considerations.

11.4 The points made above influence the approach we have followed to make our assessment of the proposed development. We first assessed the proposals against key planning and land use considerations and followed this with an assessment of whether the planning application and the development it promotes can be regarded as generally according with development plan policy. We then assessed whether the proposed development accords with Planning Policy Wales and relevant TANs as they are important material considerations. we then went onto consider whether other material considerations support the proposed development.

11.5 Matters and related topics assessed or considered, in the order presented, are as follows:

- Profile of WIE.
- Principle of development.
- Profile of proposed development.
- Suitability of site for proposed development.
- Relationship to adjoining uses and developments.
- Accessibility.
- Transportation impacts.
- Effects on ecology and BNG.
- Effects on trees.
- Flood risk and drainage considerations.
- Effects on heritage assets.
- Proposed landscaping.
- Layout and design.

- HIAB and its needs.
- Alternative sites considered.
- Economic and social values benefits.
- Other benefits.
- Creating a long term viable future for the site.
- Accordance with development plan policy.
- Compliance with Planning Policy Wales and relevant TANs.
- Other supportive material considerations.
- Key conclusions falling out of our planning assessment.

Planning assessment

Profile of WIE

11.6 Since WIE was first created it has become the largest, and most important industrial / employment zone in Wales and is second only to Trafford Zone in UK terms. It is currently home to in the order of 350 businesses and it creates employment for many thousands of local people. The estate currently extends to over 550 hectares and is home to major manufacturing, assembly, processing, light and general industrial sectors along with warehousing and distribution operations.

11.7 WIE is the key location for growth in the industrial and employment sectors in Wrexham. The council acknowledges this. The council's economic development strategy and development and growth strategies in WLDP identify WIE as the key focus for economic and employment growth in future years. WIE is marketed as the place to come to if you wish to establish and grow and develop an industrial business. These are key reasons why HIAB has taken the decision to relocate its key UK operation to WIE

11.8 For reasons biased towards ecological considerations at the expense of economic development considerations, when WLDP was being brought forward the council took the decision to exclude The Oaks Site from the defined extent of WIE and also designated it as part of WIE's Strategic Ecological Network.

11.9 Regarding the policy initiative described in the plan as WIE's Strategic Ecological Network we would point out that this designation came with no plans nor proposals as to what it is, should or might be, how it would be delivered, who would deliver it, who would pay for it nor who might maintain and manage the facility. At this point intime the site was not owned by FIREM. Had it been FIREM would have sought a different designation for the site - one that would still delivered ecological benefits, and the long terms future of the site for this use, but with a small amount of development to effectively pay for and ensure the maintenance and management of the green asset (enabling development policy). This will certainly be FIREM's position going forward should the WLDP be reviewed.

11.10 The reason for raising these points is directly relevant to the proposed development in that it is the first proposal that has been put to the council which comes close to delivering what the council designated the site for, namely, a valuable strategic ecological resource.

11.11 We put more flesh on the bones of this key point in a number of the sub-sections that follow.

Principle of development.

11.12 This is a matter we have a different view to the council on. This is by reference to feedback provided through the council's pre-application response on the proposed development – see section 8. The council's view is that the principle of development is not established. We are surprised at its position on this matter.

11.13 As set out in section 7, the site formed part of the extensive ROF Wrexham complex which was begun in 1939 and completed in 1941. This part of the ROF complex was involved in the manufacture and storage of cordite and TNT for use in munitions. This required the construction of a number of specialist manufacturing and storage buildings. This reflected the uses that these buildings were to be put to. Most these buildings, all in different states of disrepair, remain in situ, particularly the largest ones. Accordingly, it is fact that the site formed part of significant built development. The buildings developed during WW2 remain in situ albeit they are in a poor state of repair which can be rectified.

11.14 The site's historic use and development history and the fact it remains partially developed, suggests that parts of the site can be regarded as having the status of previously developed/brownfield land, which contributes to our view that the principle of development at the site is established.

11.15 And it is also worth pointing out that the site was allocated in the previous development plan, the Wrexham UDP, as forming part of the wider WIE including as land available for development, this because of its history / previously land status.

11.16 Overall, it is our view that the principle of development at the site, least parts of it, is established, and parts of the site can be regarded as having the status of previously developed / brownfield land. This profile carries weight, as a material consideration, in the determination of the planning application, particularly if for employment uses given the council's aspirations for WIE, where the site is located.

Profile of proposed development.

11.17 As we have set out in detail in section 8, the overall proposed development comprises two key components. The main component in terms of land take is the green eco-heritage park. This fully accords with the site's designation in the WLDP. This accounts for 82% of the total site area or 18.3 ha (45 acres) of the total of 22.2 ha (54.7acres).

11.18 The area proposed to be developed, which effectively pays for and delivers the long term management of the green eco-heritage park, and in this regard, it can legitimately be regarded as enabling development, amounts to only 3.6 ha (9 acres) or 18% of the total site area. And even then, this will only be used for the development of a relatively small single high quality employment unit. This extends to 6,924 sqm (74,529

sq.ft.). The ratio of built development (footprint) to site area (plot for HIAB) is very low – 1:5. Typical ratios for this type of development are much higher – often 1:2. This is because HIAB requires areas for open storage, parking, landscaping and storage of products.

11.19 Linked to the points made above, we would also point that, in normal circumstances, a site of 22.2 ha (54.7 acres) could comfortably support in the order of 46,450 sqm (500,000 sq.ft. of employment development (footprint), which mimics a number of similar developments across large parts of WIE.

11.20 It is clear therefore that the key and most noteworthy aspect of the profile of the proposed development is the fact it is mainly, and by some margin, a scheme that is green and development free. Based on the designation of the site in the WLDP this is a considerable asset of the proposal and one to be supported, particularly since the proposed development delivers the site's designation and into the long term future.

Suitability of site for the proposed development.

11.21 It is our view that The Oaks Site is eminently suitable for the proposed development.

11.22 The wider WIE is intended and almost exclusively allocated in the WLDP for commercial and employment development. The Oaks Site is now specifically designated as part of WIE's Strategic Ecological Network.

11.23 The proposed development includes a substantial and significant green eco-heritage zone. This affects the vast majority of the available site area (82%). This will be kept free of development and dedicated to ecological betterment and similarly with regard to the site's heritage assets. It will be maintained into the long term future.

11.24 The small element of the overall development proposal that is earmarked for built development, the headquarters and production facility for HIAB, affecting only 18% of available site area, is proposed in the north western point of the site, fronting Oaks Road and opposite and next to significant industrial concerns. It is the most suitable part of the site for development, in part because of its relationship to existing industrial developments, but also because this part of the wider site is not the most valuable in ecological terms.

11.25 The above analysis suggest that the site can be regarded as eminently suitable for the overall form, scale, mix and scale of uses and development when compared to the size and profile of the site. But importantly, the scheme delivers what the site is allocated for – a green ecological facility that can form part of the WIE strategic ecological network, at the expense of losing only 18% of available site area to development. But even then, the proposed development has a low footprint and development to site ratio and includes green area, new tree planting and landscaping.

Relationship to adjoining uses and developments

11.26 The only potentially sensitive use that has a functional relationship to the application site is a single dwelling located approximately 50m south west of Oaks Road some 330m to the south east of the proposed siting of the headquarters building. The rear garden area adjoins part of the application site. That part of

the application site which lies between the property and headquarters building is well treed and overgrown and there are a number of heritage assets. Collectively these act as a very effective visual screen and noise barrier but it must also be remembered that the distance between the two is over 330m. It should also be noted that this property appears to be linked to a terrace of small industrial unit / s directly fronting Oaks Road which are approximately 45m to the north east and within its curtilage. These are being used for vehicle repairs / maintenance.

11.27 There is a further dwelling, located on the eastern side of Bryn Lane, some 250m as the crow flies from the proposed headquarters building. This has no functional relationship with the application site nor will it be impacted by the development as there is a substantial industrial unit, along with landscaping and trees, between it and the only part of the application site proposed to be developed. These features will act as very effective visual screen and noise barrier. There is a further residence some 88m north east of this property. But this is also similarly screened from the application site (by existing units, trees and landscaping). We understand that there is a property that potentially remains in residential use just to the north of the River Clywedog some 380m to the south of the headquarters building but the effects of topography, trees and landscaping means this property has no functional relationship to the application site nor would it be impacted by the proposed development. Indeed, a number of other major industrial operations/buildings are significantly closer.

11.28 All other uses and developments in the immediate and wider locale, including directly to north east, north and west, are in industrial use, mainly light and general industry and warehousing and distribution. It is worth pointing out that some existing industrial buildings close to or opposite the application site are significant in scale. The majority appear to have footprints between 4,645 sqm (50,000 sq.ft.) and 9,290 sqm (100,000 sq.ft.) but there are even larger industrial buildings nearby – a building with a footprint of 22,000 sqm (236,000 sq.ft.) and one of 43,000 sqm (462,000 sq.ft.) are immediately to the north east of the application site. It is our position that there is no scope for the proposed headquarters and production facility to adversely impact on sensitive and less sensitive uses in the vicinity of the site.

11.29 Accordingly, the proposed development has a satisfactory relationship to adjoining uses and developments and will not adversely impact on them including the small number of residential properties that are located within this sector of WIE including by reference to effects on residential amenity. This is confirmed by the noise assessment carried out by Buro Veritas and submitted in support of the planning application.

Accessibility

11.30 The site is highly accessible and can be accessed by all modes including public transport, car, cycle and pedestrian route, although it is acknowledged there are no larger or well established areas of residential nearby.

11.31 This is confirmed in the transport report by Prime Transportation.

11.32 Transportation impacts

11.33 The planning application is supported by a detailed transportation report and related travel plan by Prime Transportation.

11.34 This confirms that the proposed development, with emphasis on the headquarters building and related production facilities for HIAB, can be satisfactorily accessed off Oaks Road. This applies to all types of vehicles that might visit the site. This includes light and heavy good vehicles, private cars, cycles and by pedestrians. This is also the case when these vehicles need to egress the development site.

11.35 In addition, it should be noted that the closest bus stop to that part of the site proposed to be developed, the headquarters and production building, is a mere 170m away, suggesting the site can be regarded as highly accessible by public transport.

11.36 The proposed level of car parking meets both the proposed operator's needs and additional information and plans confirms that arrangements can be adapted to satisfy car parking standards operated by the council. This is also the case with parking for HGVs and general internal circulation plus servicing arrangements for the planned unit.

11.37 The travel plan by Prime Transportation confirms a number of sustainable transportation measures and aspirations to be delivered through the planned development.

11.38 Overall, the main transportation report by Prime Transportation concludes that all aspects of the planning application and the proposed development it seeks planning permission for, including access and egress arrangements, car parking etc. and related traffic effects and impacts, can be regarded as acceptable and satisfying planning policy on the same (in development plan and NPPF).

Effects of ecology and BNG

11.39 The site has been rigorously assessed to ascertain its true ecological value, linked to how the site is treated in the LDP (under Policies SP9 and NE2) – effectively as part of the WIE strategic ecological network / local wildlife site/green/ecological resource albeit linked to the use and operation of WIE for employment purposes.

11.40 Based on assessment work by UES and discussions with the council's ecologist, the site comprises a rich mosaic of priority habitats including woodland, dense scrub and flower rich-grasslands. The site also contains a number of local heritage assets which support wildlife and contribute to the site's ecological value.

11.41 The planned green eco-heritage park, which represents the main zone of the overall application proposals, 82% of site area, will look to introduce a sensitive, sustainable, proportionate and targeted ecological resource to maximise the potential of its future biodiversity value.

11.42 The proposals will be targeted to recover and enhance some of the irreplaceable open-mosaic habitats historically found at the site but which have significantly declined due to the successional process of scrub encroachment.

11.43 The area will look to maximise the potential of the existing heritage assets, in terms of both their heritage and ecology value, ensuring their continued existence, but extending their usefulness as ecology assets.

11.44 FIREM and the planned occupier propose to work with the council and its team of ecologists, plus the likes of the North Wales Wildlife Trust, with whom FIREM is working with on other projects, to deliver this exciting aspect of the overall proposals.

11.45 Delivery of this could be controlled through use of planning condition / s and a s106 agreement.

Effects on trees.

11.46 MD Landscapes have prepared a detailed arboriculture impact assessment / tree report and landscaping plan. These confirm that the site contains a number of mature, semi-mature and immature trees, including oaks which influenced the name of the site.

11.47 The proposed layout has been designed to maximise the number of existing trees that can be retained although it is likely that a small number of trees will need to be removed to make way for the headquarters development. But in compensation for any tree losses, this element of the development will make provision for significant levels of replacement planting.

11.48 In addition and reflecting the fact that the bulk of the site is proposed to be developed and used as an extensive green eco-heritage zone, which in addition to the ecology biased proposals for this part of the site, will also benefit from an extensive landscaping plan and related tree strategy, which will involve the planting of new trees. This has been formulated with the input of the applicant's ecologists.

11.49 In conclusion, the overall proposals will secure the protection of many trees on site and while some trees will be removed the numbers are low but they will be replaced by new trees to be planted throughout the site.

Flood risk and drainage considerations

11.50 Barnsley Marshall were appointed to deal with flood risk and formulate a sustainable drainage strategy for the site based on the development proposals that are promoted through the planning application. Findings and related proposals are set out in through the flood risk assessment and drainage strategy and related plans.

11.51 The FRA confirms that the proposed development will not give rise to any flood risk related issues including from flooding water courses, drainage systems backing up, pooling water through excessive rainfall or flood risk associated with flooding by the sea.

11.52 The preferred drainage strategy is fully sustainable and embodies principles established and typically rolled out though SUDS related systems. The principles that the SUDS system for the site / development will follow aim to reduce surface water flooding, improve water quality and enhance the amenity and biodiversity value of the site and local environment. This will be achieved by lowering flow rates, increasing water storage capacity on site and reducing the transport of pollution to the water environment.

11.53 The SUDS system will use a sequence of techniques that together form a management train. As surface water flows through the system, flow velocity is controlled and pollutants are removed. Details of the management train, to be agreed and confirmed in conjunction with the council, NRW and Welsh Water, may include source control methods that decrease the volume of water entering the drainage / local river network by intercepting run-off water from hardstandings and roofs for subsequent re-use. It is also likely to include pre-treatment steps, such as vegetated swales or filter trenches, that remove pollutants from surface water prior to discharge to watercourses or aquifers; retention systems that delay the discharge of surface water to watercourses by providing storage within ponds, retention basins or wetlands, for example, infiltration systems, such as infiltration trenches and soakaways, that mimic natural recharge, allowing water to soak into the ground.

11.54 The profile, scope and details of the proposed drainage arrangements, given they will be based on and fully embody the principles common to SUDS systems, the final details of which will be scoped, discussed and agreed with the council, NRW and WW. This includes delivery and maintenance strategy and arrangements of the system. All aspects of this can be controlled through use of planning condition / s.

Effects on heritage assets.

11.55 A detailed heritage assessment and archaeological desk based assessment of the application site were carried out by Orion Heritage.

11.56 The assessments were prepared to provide advice to the commissioning client, FIREM, and support the planned planning application for the proposed development.

11.57 The assessment demonstrates that the proposed development will have no impact on the Grade II listed Pickhill Bridge (18059), the location and details of which are confirmed in the assessments. Its significance is considered to be preserved.

11.58 In addition, the assessments demonstrate that the proposed development will have no impact on the non-designated groups of buildings at Higher Oak (CPAT 146937-146941), Lower Oak (CPAT 147333-147334), Parkey Farm (CPAT 147678-147681) and Pickhill Bridge Farm (CPAT 147939-147947).

11.59 And, finally, the assessments demonstrate that the proposed development will have no impact on a number of non-designated heritage assets located within the study site as follows: 110352 Wrexham, ROF Marchwiel, building SJ389491, 110353 Wrexham, ROF Marchwiel, pill box I SJ38954925, 110354 Wrexham, ROF Marchwiel, pill box II SJ391490, 110357 Wrexham, ROF Marchwiel, pill box V SJ387493 and 120554 Wrexham, ROF Marchwiel, Isycoed, Pillbox SJ389490.

11.60 While the proposed development will result in a visual change within the surroundings of the abovementioned assets, it is considered that said change will have no impact on their potential significance, which itself is considered to be limited owing to the loss of their historic function and poor maintenance. The proposed sensitive landscaping which could highlight these assets within the wider landscape would constitute a heritage benefit and as such the potential significance of these assets would be preserved in relation to the proposed development.

11.61 It is acknowledged that the proposed development will have result in the demolition of the following non-designated heritage assets located within the study site: 110358 Wrexham, ROF Marchwiel, pill box VI SJ386493 and 110360 Wrexham, ROF Marchwiel, pill box VIII SJ386493.

11.62 Parts of the proposed development will be located across the sites of the above mentioned pillboxes, potentially requiring their demolition. This would remove any potential heritage value associated with these pillboxes, however, they are already considered to be of limited potential significance with eroded settings and as such little harm would arise from their demolition and the construction of the proposed development across their historic footprints. The proposed sensitive landscaping across the remainder of the study site, which could highlight the remaining non-designated heritage assets associated with the ROF Marchwiel site, would constitute a heritage benefit and as such the potential limited harm arising from the demolition of the abovementioned pillboxes would be offset by the landscaping of the proposed development .

11.63 The remaining buildings and structures associated with the former ROF Marchwiel site that are located within the study area / site (listed in the Heritage Assessment), which are also not included by the Clwyd-Powys Historic Environment Record, will be incorporated within the proposed green eco-heritage zone and subject to sensitive landscaping which would highlight any extant assets within the wider landscape, constituting a heritage benefit. As these remaining structures are all of varying levels of dereliction and disuse, most are considered to be of little to no heritage value and therefore will not be impacted by the proposed development, regardless of whether they require demolition for their lack of structural integrity, or whether they can be incorporated within the wider landscaping proposals.

11.64 Overall, the effects of the development proposals on the heritage assets found at the site can be regarded as acceptable, which takes into account some small unavoidable impacts.

Proposed landscaping.

11.65 MD Landscapes have prepared a detailed high quality landscaping scheme which will be delivered across all parts of the site linked to both the proposals for the main green eco-heritage zone and also those for the HIAB headquarters and production facility.

11.66 Once the overall landscaping scheme, and related proposals for the green eco-heritage zone, are implemented, collectively they will deliver high quality green areas, new valuable habitats, and well landscaping areas, which include replacement and new tree planting. Overall, these proposals will deliver the council's aims and objectives for that part of the planned WIE strategic ecological network which

straddles the site. The creation of a highly functional fully planned ecological environment for the green eco-heritage zone for this part of the site cannot be underestimated. The proposals will also set off and present in the best way possible the HIAB headquarters and production facility.

11.67 These aspects of the proposed development represent a significant benefit of the overall proposals and will greatly assist in creating a high quality, well-managed and maintained lasting ecological legacy across the vast majority of the site, and a high quality small but attractive sustainable development.

Layout and design

11.68 The proposed development will deliver the long term desired future for the vast majority of the application site through the provision of a high quality green eco-heritage zone. This is the 'planning desire' for the site as set out in the WLDP. In summary, this is through the site's allocation as part of the WIE strategic ecological network. Currently the site is overgrown, unkempt and largely misused – used by dog walkers. Its latent potential as a high quality ecology asset, offering high quality and valuable habitats has yet to be realised. This is what the proposed development will deliver.

11.69 While it is the applicant's intention to work with the council's ecologists and other related professionals to draw up very detailed plans for this facility, potentially working in conjunction with the likes of the North Wales Wildlife Trust, which FIREM has experience of, the plans already formulated and drafted by the applicant's ecologists and landscape architects, show how the facility might grow and develop and be managed. It is clear that what is proposed will deliver exactly what the WLDP hopes for it – that the site become a valuable ecological asset as part of a larger, manged strategic ecological network.

11.70 The proposed green eco-heritage zone will be promoted across approximately 82% of the application site, the vast majority of it. The remaining 18%, will be used for a small discrete development in the form of a combined headquarters and production facility for HIAB.

11.71 The main and only unit will be of a high quality of design and follow sustainable development principles and the development itself will use modern attractive good quality materials in its construction. The facility incorporates integral offices which will face out of the development towards Oak Road. The layout makes provision for a separate access and egress off and to Oak Road. The car parking needs of HIAB will be met. As we have already confirmed, HIAB's car parking needs are less than car parking standards suggest should be provided. Although the HIAB car parking scheme/numbers is what the planning application seeks planning permission for, the package of application drawings includes a plan that demonstrates how additional parking could be provided. Indeed, if the council considered it appropriate any grant of planning permission could be made bespoke / personal to HIAB. And as we have already confirmed HIAB see the site to be a long term venture. In the event that, at the end of its lease, HIAB decided to vacate the site, FIREM as owner of the site, would be happy to introduce additional parking spaces to meet standards.

11.72 The yard areas of the facility will be of a high quality and functional design and afford easy access into and out of the production areas for machinery and finished products. The yard will also allow storage of built/assembled products.

11.73 As many existing trees as possible within this part of the site will be retained but the small number to be lost due to the preferred, and optimum, siting for the unit, will be replaced and supplemented by additional tree planting. The site will also be well landscaped.

11.74 The layout and design of the facility has been specifically designed to meet the production, working, staff and office needs of HIAB, and in this regard can be regarded as fully bespoke and of a high quality.

HIAB and its needs

11.75 We set out in detail in section 4, the key reasons why HIAB is planning to relocate its current headquarters from Ellesmere in Shropshire to the planned facility at The Oaks, WIE. We are of the view that the needs of HIAB for a new high quality headquarters facility , and its decision to focus on The Oaks site at WIE, are important considerations, material considerations, which should be given considerable weight in the planning decision on the planning application.

11.76 HIAB set itself a brief to identify and secure a unique, high quality, high profile site that can deliver a new headquarters and production facility with that is capable of meeting its specific production and operation needs. This is an important point in that the proposed unit that is in for planning is bespoke. It meets all of HIABs accommodation needs.

11.77 HIAB selected Wrexham, influenced by the fact it is very loyal to its employees, and in which it has made a great investment. Its employees enjoy good working conditions, training and opportunities to gain experience and development within the business. Accordingly, it required its new headquarters to be acceptably close to its current base at Ellesmere. Acceptable was set at being within, as the crow flies, a distance of approximately 20km (12 miles) from the old headquarters. This distance was regarded as being sufficiently close to its current base for existing staff to be a happy to make the journey to the new site. There is of course the potential that some staff living north of Ellesmere will have their journey to work reduced in distance / time terms.

11.78 In this instance the distance from the current headquarters to the new site as the crow flies is 14 km (8.4 miles), some 6km (3.6 miles) within the threshold set by HIAB. The Oaks option which HIAB has selected as its optimum location means the company can retain all of its current staff based at Ellesmere. This would not have been the case regarding the other options considered, including Crewe (38 km away), Warrington (58 km away) and Wolverhampton (64 km away).

11.79 A key attraction of Wrexham To HIAB is that it offers opportunities to link to with local colleges and universities on engineering initiatives and research opportunities. These include Wrexham University, University of Chester and Yale College. This is also the case with other local companies on WIE that operate within similar areas including JCB and Dhollandia etc. HIAB often works directly or indirectly with companies of this ilk on engineering projects and initiatives.

11.80 There are also key reasons why HIAB selected The Oaks Site for its new headquarters main production facility.

11.81 HIAB is a business that started life in Scandinavia, as set out in section 3. Many of its historic sites in this part of the world, plus newer sites there and elsewhere in the world, are set within or have access to large undeveloped green areas, typically held for the benefit of its staff/employees for recreational purposes. As this continues to be a desire of HIAB, part of its brief for a new location / site for its new headquarters and main production facility was proximity to a dedicated adjacent green area. This was a key factor that made The Oaks Site a very attractive proposition to HIAB, this by reference to the fact a unique aspect of the wider site is the fact it allows not only the creation of a high quality new headquarters and production facility, but also the creation of a large green eco-heritage zone next door on the major part of the site. HIAB expects and wants to be part of the team that delivers this facility and maintains it into the longer term future, which also complements HIAB's commitments to long term environmental and sustainability objectives.

11.82 Overall, it is our position that HIAB site related requirements which have resulted in WIE and within it The Oaks site being identified as the optimum location for its new headquarters and production facility, and that this represents an important material consideration in support of the planning application .

Alternative sites considered

11.83 A key question that arises with regard to this matter is whether it is necessary to consider the availability of other sites for the proposed development.

11.84 We say at the outset that it is not necessary.

11.85 We say this by reference to the fact the planning application and the proposed development it seeks planning permission for is directly related and linked to the planning application site. No other specific site or site related opportunity, regardless of where it is, or whether it is available or not, is capable of delivering what the application proposal is mainly intending to deliver – the site's allocation in the WLDP. We acknowledge that a related development is also proposed, but this is relatively small in land take terms, but importantly is the means to deliver what the site is designated for in the WLDP. In essence, the specifics of the application and the development it proposes are directly related to and bespoke to The Oaks Site. No other site can deliver on this key point.

11.86 The application seeks to deliver on approximately 82% of the planning application site, what the site is allocated for in the WLDP – a green ecology asset that can become part of the WIE strategic ecological network. In this case this will be in the form of a green eco-heritage park which will deliver a considerable array of high quality and sustainable ecology, heritage and related benefits. This facility will deliver the site's hoped for by the council, and as set out in WLDP, long term future as part of a strategic ecological network ecology at WIE. This will be complemented by the inclusion of a small discrete development – the new HIAB headquarters and production facility.

11.87 The corollary of the points set out above is that no other site in WIE, the Wrexham conurbation or any other part of the borough can deliver what is required at The Oaks Site by reference to its allocation in WLDP. In essence the only site that needs to be considered is The Oaks Site.

11.88 But regardless of the above, none of the alternative sites at WIE and in the wider Wrexham conurbation that were considered by us and FIREM, on HIAB's behalf, came close to meeting its development and site related needs. This is a very telling point. Since if the council does not want to support HIAB's plans to relocate to The Oaks Site, as set out in the planning application, there is a good prospect that HIAB will recommence its search for a suitable site / development opportunity elsewhere. There is a very good chance, as we have already said, this very likely to be outside of Wrexham.

Enabling development considerations

11.89 We have already set out several times that the main element of the planning application in proposed development terms is the green eco-heritage zone. This affects 82% of the available site area. The element proposed in the residual area, the remaining 18% of the application site, is the proposed headquarters and production facility for HIAB. This element of the wider proposals is directly related to the green eco-heritage zone. the relationship is created this development pays for, delivers and secures the long term maintained and maintained future of the green eco-heritage zone. In essence, the element proposed on 18% of the application site, the HIAB HQ unit, facilitate the vast majority of the application site, 82% of it, being retained for use for purposes intended of it by the LDP.

11.90 Enabling uses can be uses / developments that, because of how a site is allocated or designated, might not typically be supported or regarded as acceptable. The fact, by reference to their ability to pay for and / or contribute towards the delivery of other beneficial uses / developments, which the planning system might not otherwise naturally support, is a material consideration, and one that can be given great weight in planning decisions. For example, enabling development that might not otherwise have been supported but which effectively fund major community stadium developments; retail and commercial development that make major regenerative residential schemes with high levels of affordable housing viable and deliverable; residential development on adjoining land to an important listed building which effectively pay for and deliver the restoration and conservation of the heritage asset (part of a conservation deficit case).

11.91 This is the case here. The headquarters and production facility, which only affects a small part of the wider application site, pays for and delivers what the entire site is designated for in the WDLP. This is an important material consideration in support of the planning application.

Economic and social values benefits.

11.92 There are many benefits that the proposed development will deliver. These are set out in section 9. In summary, they fall into the categories of socio-economic benefits, social value benefits, long lasting ecology and heritage benefits and profile building benefits for the City of Wrexham.

11.93 Setting aside the main and most obvious benefits – delivery of what the site is designated for in WLDP, a key and we say important benefit is the fact a high quality, well known and renowned international industrial company wishes to relocate from England to Wales, Wrexham specifically, so as to set up its new UK headquarters and main production facility.

11.94 The benefits that a development proposal might deliver, assuming they are deliverable and can and will be delivered, which is the case here (through use of planning conditions and s106 agreement), are important material considerations that can and should be given weight in the determination of the planning application.

Creating a long term viable future for the site

11.95 We have already touched on this several times in this section of the statement, but this has to be regarded as a fundamental benefit of the planning application, namely that if it is permitted the scheme it seeks planning permission for will deliver, and on the vast majority of the available site area, exactly what the site is designated for in the WLDP. In the absence of this application and the proposed development, assuming it is granted and the development delivered, the site's designation will not be delivered. Instead the site will simply be left as it is. It will continue to naturally progress which will see it become overgrown and unkempt, year on year, causing it to lose much of its ambient ecological value, whilst at the same time the state and condition of the existing heritage assets will continue to decline and become inaccessible. We would expect that they will decline to the point that, at some point in future, they will have to be demolished for safety reasons.

11.96 Accordingly, creating a long term viable, functional and beneficial and largely policy compliant future of the site, which also delivers a wide range of benefits which the local community and wider borough will benefit from, should not be under estimated, and should be given great weight in the determination of the planning application.

Accordance with development plan policy

11.97 We now turn to consider whether the planning application by reference to the proposed development it seeks planning permission for, generally accords with relevant development plan policy, in this case relevant policy set out in WLDP. Relevant policies were confirmed by the council through its pre-application advice letter. They are listed in section 6 of this statement.

11.98 We introduce the term, 'generally accords with,' since most planning policies are lengthy, detailed in content and often criteria biased in structure. It is usually virtually impossible to fully and to the letter completely accord with a policy. A judgement therefore has to be made as to whether a policy can generally be accorded with, which we say is influenced by whether, in most cases, the key aims and objectives of the policy, perhaps by regard to related criteria, can be satisfied.

11.99 Relevant policy, including our assessment of whether they are generally accorded with, is as follows:

- Policy SP2: Location of Development – this policy seeks to direct new development to the defined settlement limits and employment areas. The site is within the defined area of WIE – it is designated as part of the WIE strategic ecological network. This policy can generally be accorded with.
- SP5: Planning obligations – this policy confirms that planning obligations will be sought to mitigate any impacts directly related to the development and will be assessed on a case by case basis in line with

relevant planning legislation. Examples of the types of obligations that could be sought as a result of new development include a number of areas. Those considered of relevance to the proposed development are active travel; public transport and highway improvements; green infrastructure; affordable Housing; and preservation and enhancement of heritage assets. The applicants would be happy to enter into a s106 agreement to deliver obligations relating to these matters. This policy is considered to be generally accorded with.

- SP8: Economic Growth, Employment & Enterprise – this policy confirms that, to ensure the continued role of the County Borough as a key economic driver in North Wales and the wider region, WLDP Plan will diversify the local economy and widen the economic base by a number of measures listed under the policy. This includes allocating a strategic expansion site of 28ha at WIE – the County Borough's Key Business Sector area, improving the quality of employment sites supply within WIE and protecting a strategic ecological network for a number of local, national and internationally protected species and habitats. The proposed development is at WIE and designed to deliver a green eco-heritage zone which can form part of the planned WIE strategic ecological network. This policy is considered to be generally accorded with.
- SP9: Wrexham Industrial Estate – the policy confirms that WIE 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. As already confirmed, the green eco-heritage zone delivers part of the strategic ecological network. The policy can generally be regarded as being accorded with.
- Policy SP12: Design Principles & Masterplanning – the policy confirms that all development will be required to be of a high quality, sustainable design which makes a positive contribution to the creation of locally distinctive places by complying with the masterplanning framework SPG and KSS schematics. Proposals must demonstrate how they have taken account of the local characteristics of surrounding areas and how innovative design solutions will enhance the quality of the built and natural environment. The built element of the wider proposed development is bespoke and of a high quality including in terms of proposed layout, design, materials and other aspects of the scheme including landscaping and tree planting. The green eco-heritage zone takes full cognisance of the local area and will deliver a high quality improved natural environment. This policy is generally accorded with.
- Policy SP14: Natural Environment – this policy confirms that development will only be permitted where it seeks to protect, conserve and enhance the natural environment. natural environment is defined. it covers, inter alia, protected species and their habitats; local wildlife sites; local nature reserves; natural landscape features and green infrastructure such as trees, hedges and woodland which contribute to the quality and diversity of the natural environment and play an important role in mitigating the impact of climate; and habitats and species of principal importance to Wales. Although arguably not all of the above designations / identified features etc. apply to the application site, nonetheless the main component part of the overall proposed development, the green eco-heritage

zone, on 82% of the available site area of the planning application site, is specifically designed and intended, and over the long term future, to deliver significant improvements to the natural environment and ecology of the site. This policy can be regarded as being generally accorded with.

- Policy SP15: Historic and Cultural – this policy confirms that development will only be supported where it conserves, protects, preserves or enhances the cultural and historic assets of the county borough and their setting. The list includes listed buildings; conservation areas; registered historic parks, gardens and landscapes; and scheduled monuments and archaeological remains. None of the heritage assets at the site are statutorily listed buildings nor otherwise affected by or included in any of the designations listed as part of this policy. Nevertheless, it is acknowledged that there are a number of local heritage assets at the site. The development proposals largely protect and conserves the majority of these assets and will create a more certain and guaranteed future for them than is the case now / in the absence of the application proposals. It is our view that the expectations of this policy can generally be accorded with, and while it is unfortunate that the planned headquarters etc. facility for HIAB might require the removal of a local heritage asset, the heritage assessment confirms that this loss is not regarded as significant. The overall heritage related benefits of the proposed developments suggest the policy can generally be accorded with.
- SP16: Minerals Supply and Safeguarding – this policy seeks to protect potential mineral resources by ensuring that development proposals do not sterilise such resources or by directing new development elsewhere. This policy is directly in conflict with the site's designation in WLDP – part of WIE strategic ecological network. Clearly, mineral extraction, all forms, is intrusive and highly impacting on sites, their surroundings and the local environment. This would be the case should this be pursued at the site. And in this regard, the site's ability to contribute in a meaningful way or form to the WIE strategic ecological network would be wholly destroyed / removed. Another related point is that we are advised that it would be neither feasible nor viable to remove minerals from the site by reference to its size and relationship to infrastructure and surrounding uses. We question whether this policy is relevant. It is also our position that the policy is in conflict with how the site is mainly designed, as part of the WIE strategic ecological network, and that this policy carries greater weight.
- Policy SP18: Climate Change – this policy seeks to mitigate against the effects of climate change and adapt to its impacts, which requires development proposals to demonstrate that they have taken into account a number of relevant factors and influences. These include reducing carbon emissions; protecting and increasing carbon sinks; adapting to the implications of climate change at both a strategic and detailed design level; promoting energy efficiency and increasing the supply of renewable energy; maintaining ecological resilience; avoiding areas susceptible to flood risk and generally preventing development that increases flood risk. As we have demonstrated through technical support documents lodged with the draft planning application, the site / proposed development can be regarded as acceptable or supportable by reference to these considerations. This policy is generally regarded as being accorded with.
- Policy SP19: Green Infrastructure – this policy relates to Wrexham's distinctive natural heritage provides a network of green and blue infrastructure. Protection, conservation and enhancement of

natural heritage networks needs to be reconciled with the benefits of development. We regard this policy to be accorded with as the proposals mainly centre on the creation of a high quality and long lasting green eco-heritage zone.

- Policy EM2: Provision of Supporting Facilities for Employees in Business, Industrial and Warehousing – we are not sure of the relevance of this policy, which seeks provision of open space, public realm, leisure, food and drink, and child-care facilities appropriate in the employment areas shown on the proposals map, provided listed criteria can be satisfied. The only point of relevance is that relating to open space, and in this regard the small headquarters facility includes landscaping and open space, and the main part of the wider scheme, the green eco-heritage zone is, in many regards, entirely open space orientated. While we do not regard this policy as being particularly relevant, nevertheless we regard those elements that might be of some relevance to be generally accorded with.
- Policy EM4: Employment Development Outside of Settlements – we question whether this policy is relevant as the site is not directly allocated for employment. That said the site is within WIE, where new employment development is directed, and the built element of the wider proposals, the new headquarters facility, delivers the main designation of the site – a facility that can become a functioning part of WIE's strategic ecological network. In this regard the policy is generally accorded with.
- Policy NE2: Local Designations for Nature Conservation and Geological – this policy confirms that development which adversely affects the nature conservation and / or geological importance of locally designated sites, habitats and species will only be permitted in exceptional circumstances where it can be demonstrated that: there is no satisfactory alternative location for the development which avoids nature conservation impacts; and compensation measures are designed to ensure that there is no reduction in the overall nature or geological conservation value of the site. The proposed development is unique. It would deliver significant ecological and environmental improvements and benefits to a site regarded and designated as being of local importance in terms of its ecological value and profile. In this regards its effects are positive not negative. Regarding the need to demonstrate that there are no alternative sites, in this case this need cannot be regarded as being applicable for the reasons given earlier in this section and in section 4 of the statement. This is because the application and the proposed development it proposes is unique and bespoke to this site and designed to deliver what the site is designated for in WLDP. So, the majority of the scheme, 82% of it in land take terms, will deliver exactly what the site's designation requires/seeks – a high quality ecological resources. This is delivered through a small employment unit to be used as a headquarters and production facility, which significantly plays the role of enabling development, in this case the ecological resource – without it the ecological resource would not be delivered. And regarding the need for the development to include compensation measures designed to ensure that there is no reduction in the overall nature or geological conservation value of the site this is not relevant, but for the record the development would not reduce the geological value of the site. We regard this policy to be generally accorded with.

- NE3: Trees, woodland and Hedgerows – this policy seeks to protect and avoid unacceptable harm to these resources. The overall development proposal delivers a significant range of tree, woodland and hedgerow related benefits and into the long term future and in a managed and guaranteed way. This policy is considered to be generally accorded with.
- NE6: Waste Water and Water Quality – as the policy seeks, the new development will not adversely affect the integrity of the River Dee and Bala Lake SAC in particular through the planned treatment of waste water this policy is generally accorded with.
- Policy DM1: Development Management – this is a detailed development management policy. It is considered accorded with because, by reference to the scope and profile of the proposed development and relevant criteria forming part of the policy, the development reflects and accords with local character and distinctiveness; it has an acceptable impact on the local area and amenity levels currently found there; it safeguards the natural environment of the area; it maintains personal safety; it prioritises sustainable transport modes; it is acceptable in all other transportation regards; it contributes towards carbon emissions; there is no flood risk and drainage arrangements are acceptable; the built elements are sustainable and there is no risk from historic coal mining: .
- Policy T1: Managing Transport – this requires the transportation profile, needs and impacts of a development to be acceptable and for reasons already given this policy can generally be regarded as being accorded with.
- Policy MW1: Minerals Safeguarding – this policy seeks to protect mineral resources. For reasons already given we regard the proposed development to generally accord with the aims of this policy.

Compliance with national planning policy.

11.100 For similar reasons to those set out above with regard to development plan policy set out in WLDP, we are of the view that the planning application can generally be regarded as according with Planning Policy Wales. In summary, we say this by reference to the following:

- The proposed development takes into account placemaking and sustainability objectives and the proposed development will achieve a sustainable place and the improved and long term well-being of the site.
- The development embraces key planning principles – including growing the economy in a sustainable way and maximising environmental protection and limiting environmental impact.
- The development is well laid out and designed and uses quality, sustainable materials.
- The planning application promotes a healthier place than the site in its current form.
- The proposed development supports of the promotion of the Welsh Language and Welsh communities and the role of planning in delivering these objectives;
- The development will deliver sustainable management of and the long term improvement and maintenance of a natural resource.

- The development has had regard to the need for strategic placemaking and related advice on how this can be delivered through planning.
- The development is accessibility - it will facilitate reducing trips and use of sustainable modes.
- It is our position that much of the site can be regarded as previously developed land.
- The proposed development benefits from existing relevant infrastructure.
- The development will contribute to promoting social, economic, environmental and cultural well-being by providing a high quality and well-connected development.
- The development enables people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport
- The development will be a productive and enterprising place which promotes the economic, social, environmental and cultural well-being of the country by providing well-connected employment and sustainable economic development.
- The development utilises sustainable transport infrastructure and seeks to tackle the climate emergency, reduce airborne pollution and to improve the social, economic, environmental and cultural well-being of Wales.
- The development delivers significant economic development benefits and can contribute to generating sustainable long-term prosperity, jobs and incomes.
- The development supports developments like that proposed under the planning application which has high energy performance, supports decarbonisation, tackles the causes of the climate emergency, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures.
- The development recognises the special characteristics of the application site and will improve and conserve its historic environment, landscape, biodiversity, geodiversity and habitats, and other special and unique characteristics.
- The development mainly protects and enhances the historic environment of the site.
- The development boosts the site's green infrastructure including trees and woodlands hedgerows and makes provision for new tree planting. The development protects and maximise the value of such assets.
- The development will deliver a high quality and long lasting biodiversity and ecological resource which will contribute to and link with other similar nearby networks.
- The development is acceptable in the context of water / drainage and flood risk.
- This is also the case with regard to air quality and soundscape.

- The development balances the provision of lighting to enhance safety and security to help in the prevention of crime and protects the natural and historic environment including wildlife and features of the natural environment such as tranquillity.
- The development transforms and regenerates an area that has the potential to deliver ecological and environmental benefits.
- Relevant TANs including TAN 5: Nature conservation and planning (September 2009); TAN12: Design (March 2016); and TAN18: Transport (March 2008) have also been considered and key advice can are also generally be accorded with.

Review of material considerations.

11.101 As is set out in detail in this section, there are many material considerations that support the planning application, which can and should be considered in support of the planning application, and which weigh in support of it being granted. These include the many economic and social values benefits the development will deliver along with the fact the development will deliver a long lasting solution to The Oaks Site which is through a high quality ecological, heritage and environmental asset which will be maintained and managed into the long term future.

Key conclusions following planning assessment.

11.102 Overall, we are of the view, as is FIREM and HIAB, that the planning application and the proposed development it promotes has much to merit it, can be regarded as generally according with development plan policy set out in the WLDP, and policy in Planning Policy Wales and related TANs, and there are also a number of material considerations which support the planning application being granted.

12 CONCLUSIONS

12.1 The proposed development would deliver a high-quality headquarters development for an internationally renowned industrial company.

12.2 The business wishes to relocate its UK headquarters to Wrexham/WIE specifically The Oaks site.

12.3 In arriving at its decision, working alongside FIREM and its team, the planned occupier has investigated, assessed but discounted a number of other industrial locations/sites/development opportunities in and around the wider Wrexham conurbation including WIE.

12.4 As far as the planned occupier is concerned, the Oaks site is the optimum location for its new UK headquarters.

12.5 The development would deliver a high-quality headquarters facility plus a unique high-quality ecology and heritage zone which represents a significant benefit of the overall proposal.

12.6 The development would deliver a wider range of important and relevant benefits including profile benefits (for the City of Wrexham), socio-economic benefits, social value benefits and valuable ecology and heritage related benefits.

12.7 The proposed development can in our view by supported by reference to the site's designation and related policy in the LDP and through the application of other relevant policies in the LDP and by reference to national planning policy applying in Wales.

12.8 There are a number of weighty other material considerations that can be presented in support of the proposed development.

12.9 Overall, it is our view that the proposed development has much to merit it and can be supported by reference to all levels of relevant planning policy, including development plan policy, and benefits from many material considerations.