PLANNING, DESIGN, AND ACCESS STATEMENT

STRATEGIC ECOLOGY CORRIDOR, WREXHAM

Mauna Kea Ltd

Carter Jonas

Classification L2 - Business Data

Carter Jonas

Date: May 2025

Client: Mauna Kea Limited

Job Number: J0082108

Contact: Andy Cowan

Project Ref:	J0082108	J0082108	J0082108
Status:	Draft	Draft	Final
Issue/Rev:	01	01a	01b
Date:			
Prepared by:	SC, AC	AC	SC
Checked by:	AC	HB	AC

Bloc
17 Marble Street
Manchester
M2 3AW

T: 0113 242 5155

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1. INTRODUCTION

1.1. Carter Jonas LLP ("The Agent") is instructed by Mauna Kea Limited (the "Applicant") to act as planning agent in relation to a proposed development at Land off Francis Lane, Wrexham ('The Northern Ecological Mitigation Area') and Land adjacent to the B5130 and Land off Maesgwyn Lane, Wrexham ('The Southern Ecological Mitigation Area'), Combined these parcels of land as known as the Strategic Ecology Corridor, Wrexham.

1.2. Mauna Kea Limited is a fully owned subsidiary of Net World Sports ('NWS'). NWS is an award-winning global online retailer that specialises in sports, fitness, leisure, and home & garden supplies. NWS are a long-term investor and occupier within the Wrexham Industrial Estate, operating from their Headquarter Building off Bryn Lane. NWS are seeking to develop land in the wider area for further employment uses.

1.3. As background, NWS has a portfolio of sites which they are developing within the Wrexham Industrial Estate area. These include:

- Land North of Bryn Lane, Wrexham – also known as Utopia City and subject to a live hybrid planning application (Ref: P/2023/0497).
- Land South of Bryn Lane, Wrexham – subject to a live full planning application (Ref: P/2025/0143).
- The existing Net World Headquarters Building where NWS are currently considering expansion plans.

1.4. Across each of these schemes, ecology matters are likely to be a key material consideration. Through discussions with Natural Resources Wales (NRW) and Wrexham County Borough Council (WCBC) on Utopia City on 11 October 2024, there was an opportunity to develop a strategic approach to delivering a significant uplift in the quantum and quality of ecological land within the Wrexham Industrial Estate area.

1.5. This off-site solution – known as the Strategic Ecology Corridor - is in close proximity to the sites referenced within Paragraph 1.3. This would complement any on-site provision of ecological mitigation land, ensuring that a substantial proportion of the developable site area for each scheme is given over for ecological purposes. NWS has engaged in a land assembly exercise to deliver this aspiration. In total, NWS has control over 20.85ha of land to serve this purpose.

1.6. There is a need for an off-site solution on the basis that fully meeting requirements for ecological mitigation land on-site is not possible. Requiring this would jeopardise the efficient use of land within the Wrexham Industrial Estate, an allocated employment site, reducing the amount of floorspace that can be created and reducing employment opportunities in the area.

1.7. Appendix A includes an illustrative masterplan showing the sites within Paragraph 1.3 in context with the Strategic Ecological Corridor.

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1.8. This Planning, Design, and Access Statement has been prepared in support of a Full Planning Application for:

Change of use from agricultural to ecological land use alongside the erection of bunds, access, landscaping, and associated works.

1.9. This Statement should be read in conjunction with the following documents which accompany the planning application package.

- Covering Letter prepared by Carter Jonas LLP
- Completed Application Forms prepared by Carter Jonas LLP
- Planning, Design, and Access Statement prepared by Carter Jonas LLP

Landscaping Drawings prepared by Nicholsons, with drawing references as follows:

- 4826 – Strategic Ecology Corridor – V4 – 1.1 – Parcel 1 Overview
- 4826 – Strategic Ecology Corridor – V4 – 1.2 – Parcel 1 Inset 1
- 4862 – Strategic Ecology Corridor – V4 – 1.3 – Parcel 1 Inset 2
- 4826 – Strategic Ecology Corridor – V4 – 1.4 – Parcel 1 Sections
- 4826 – Strategic Ecology Corridor – V4 – 2.1 – Parcel 2 Overview
- 4826 – Strategic Ecology Corridor – V4 – 2.2 – Parcel 2 Inset 1
- 4826 – Strategic Ecology Corridor – V4 – 2.3 – Parcel 2 Inset 2
- 4826 – Strategic Ecology Corridor – V4 – 2.4 – Parcel 2 Sections
- 4826 – Strategic Ecology Corridor – V4 – 3.1 – Parcel 3 Overview
- 4826 – Strategic Ecology Corridor – V4 – 3.2 – Parcel 3 Inset 1
- 4826 – Strategic Ecology Corridor – V4 – 3.3 – Parcel 3 Inset 2
- 4826 – Strategic Ecology Corridor – V4 – 3.4 – Parcel 3 Sections
- 4826 – Strategic Ecology Corridor – V4 – 4.1 – Parcel 4 Overview
- 4826 – Strategic Ecology Corridor – V4 – 4.2 – Parcel 4 Inset 1
- 4826 – Strategic Ecology Corridor – V4 – 4.3 – Parcel 4 Inset 2
- 4826 – Strategic Ecology Corridor – V4 – 4.4 – Parcel 4 Sections
- 4826 – Strategic Ecology Corridor – V4 – Red Line Boundary Plan_Site Location Plan
- 4826 – Strategic Ecology Corridor – V5-5 – Initial Phasing Plan

Documents produced by Tier Consult:

- Strategic Ecology Corridor – Preliminary Risk Assessment Land adj B5130
- Strategic Ecology Corridor – Preliminary Risk Assessment land off Francis Lane
- Strategic Ecology Corridor – Proposed Levels

- Strategic Ecology Corridor – Proposed Earthworks

Documents produced by The Environment Partnership:

- Strategic Ecology Corridor – Ecological Assessment – Land adj the B5130
- Strategic Ecology Corridor – Ecological Assessment – Francis Lane

1.10. This Planning Statement seeks to assess the proposal in the context of relevant material planning considerations and is structured as follows:

- Section 2: Describes the site and its surrounding context;
- Section 3: Describes the consultation process.
- Section 4: Outlines the proposed development.
- Section 5: Identifies the Development Plan and other material planning considerations relevant to the determination of this application;
- Section 6: Assesses the proposal in the context of the identified relevant Development Plan policies and other material considerations;
- Section 7: Summarises the planning case in support of the scheme.

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2. SITE AND SURROUNDINGS

Site Description

2.1. The Site comprises two areas of land: Land off Francis Lane ("the Northern Ecological Mitigation Area") and Land adjacent to the B5130 and Land off Maesgwyn Lane ("the Southern Ecological Mitigation Area"), Wrexham. Combined, they extend to approximately 20.85 ha and both currently comprise agricultural land.

2.2. Physical changes to the land are proposed for the Land off Francis Lane and the Land off the B5130, however no physical change will occur to the land off Maesgwyn Lane. Therefore, this land has not been included in any of the investigation reports which have been submitted as part of this planning application. For the Land off Maesgwyn Lane, this planning application is seeking to continue the use of this land as agricultural, however the use will be sensitive to the ecological importance of the land.

2.3. The Northern Ecological Mitigation Area is bound by residential dwellings to the west including an area of hardstanding. The site is bound to the north and east by agricultural fields, with a new development proposal for an extension to the industrial estate submitted to Wrexham Council for the land southeast of Francis Lane.

2.4. Existing features include having a thick hedgerow boundary surrounding all boundaries of the land and mature trees located within the field, with other trees present along the field boundaries.

2.5. Boundaries are typified by hedgerows consisting of native species. There are telephone poles which are located intermittently along the southern boundary of the field. This area is approximately 2.9 ha.

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Figure 1: The Northern Ecological Mitigation Area (red outline), Google Maps 2025.

2.6. The Southern Ecological Mitigation Area is bound by Wrexham Industrial Estate to the west, the existing Net World Sports Headquarters to the north and open fields to the east and south. The B5130 splits the parcels up, with three parcels located to the west of the road and one to the east. In total, this area is approximately 17.14 ha.

2.7. The Southern Ecological Mitigation Area is made up of four separate parcels of land, as illustrated below. The land in between parcels one and two is held in Third Party ownership and already benefiting for planning permission for ecological purposes.

2.8. The land is currently made up of open fields, which have dense hedgerow boundaries, with access achieved off the B5130 through two gateways. There are numerous mature trees and number of existing ponds already present on the land. The boundary between each of the parcels is made up of hedgerow and trees.

2.9. High level electricity wires run through parcel two.

2.10. There is an existing Public Right of Way (PRoW) which runs close by to the north and west boundary of parcel 2. This will remain on site within this development proposal.

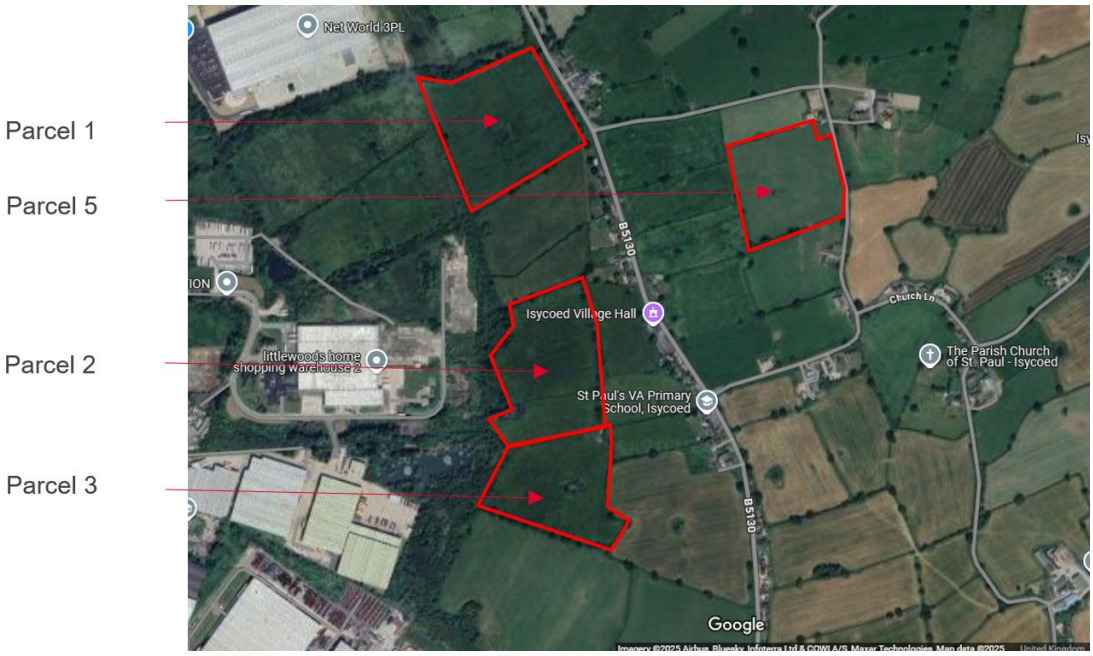


Figure 2. The Southern Ecological Mitigation Area (red outlines). Google Maps, 2025.

Site Surroundings

2.11. The Strategic Ecology Corridor is located to the north and on the eastern edge of the Wrexham Industrial Estate.

2.12. The Wrexham Industrial Estate is the UK's second-largest industrial estate extending to over 550 ha[2] and is recognised as a regionally and nationally important employment area. It is located 2.5 miles to the east of Wrexham Town Centre.

2.13. Francis Lane is a narrow road which runs from the north of the Industrial Estate to Holt which is a village located to the east. The lane runs adjacent to Wrexham Road which is an arterial road running east-west connecting Wrexham to Stoke-on-Trent.

2.14. The B5130 runs along the south-east boundary of the industrial estate, where is moves northeast at the top of the industrial estate and connects to Francis Lane, close by to the village of Holt.

2.15. The land to the north, east and south of the Northern Ecological Mitigation Area is currently used as agricultural land. Land to the south-east is subject to a live planning application which is known as the 'Land North of Bryn Lane Development' which is pending determination (ref: P/2023/0497). While the majority of surrounding land is currently open space, there are residential dwellings located to the west of the land and Wrexham Industrial Estate is approximately 300 metres to the south of the site.

2.16. The land to the east and south of the Southern Ecological Mitigation Area is also open agricultural fields, with Wrexham Industrial Estate located to the west. Net World Sport's Headquarters building is located to the north of the site, demonstrating the commercial surroundings of the site. The Southern Ecological Mitigation Area will act as an ecological buffer between the industrial estate and the surrounding agricultural fields to the east.

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Heritage

2.17. The Northern Ecological Mitigation Area is not within a Conservation Area, nor are there any listed buildings, Registered Parks & Gardens or Scheduled Ancient Monuments on the land. However, according to Cadw who are the Welsh Government's Historic Environmental Service, immediately to the west of the development is 'Llan y Pwll' which is a Grade II Listed Farmhouse. Due to the nature of the Proposed Development, this asset is not likely to be adversely impacted from a heritage perspective. Figure 3 below shows the site outlined in red, with the nearby listed asset represented by the blue dot.

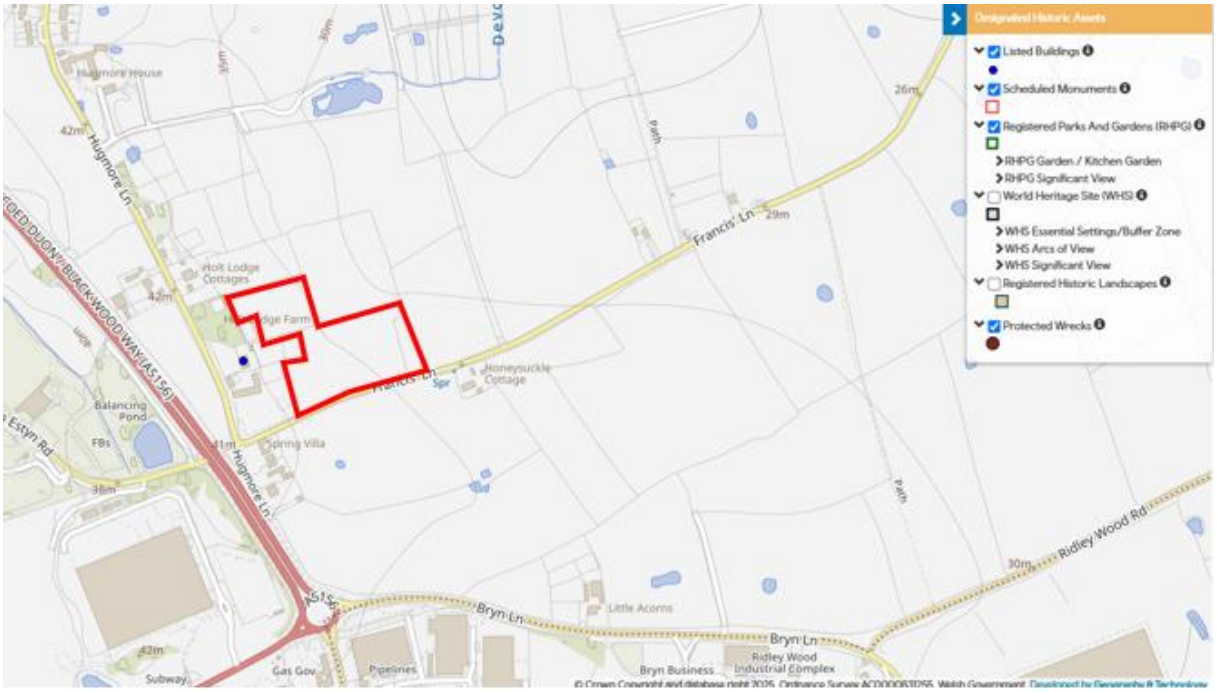


Figure 3. Nearby Listed Buildings and Scheduled Monuments: Northern Ecological Mitigation Area, outlined in red. Cadw, 2025

2.18. The Southern Ecological Mitigation Area is not located within a Conservation Area and there are no listed buildings, Registered Parks & Gardens or Scheduled Ancient Monuments within or directly adjacent to any of the four parcels.

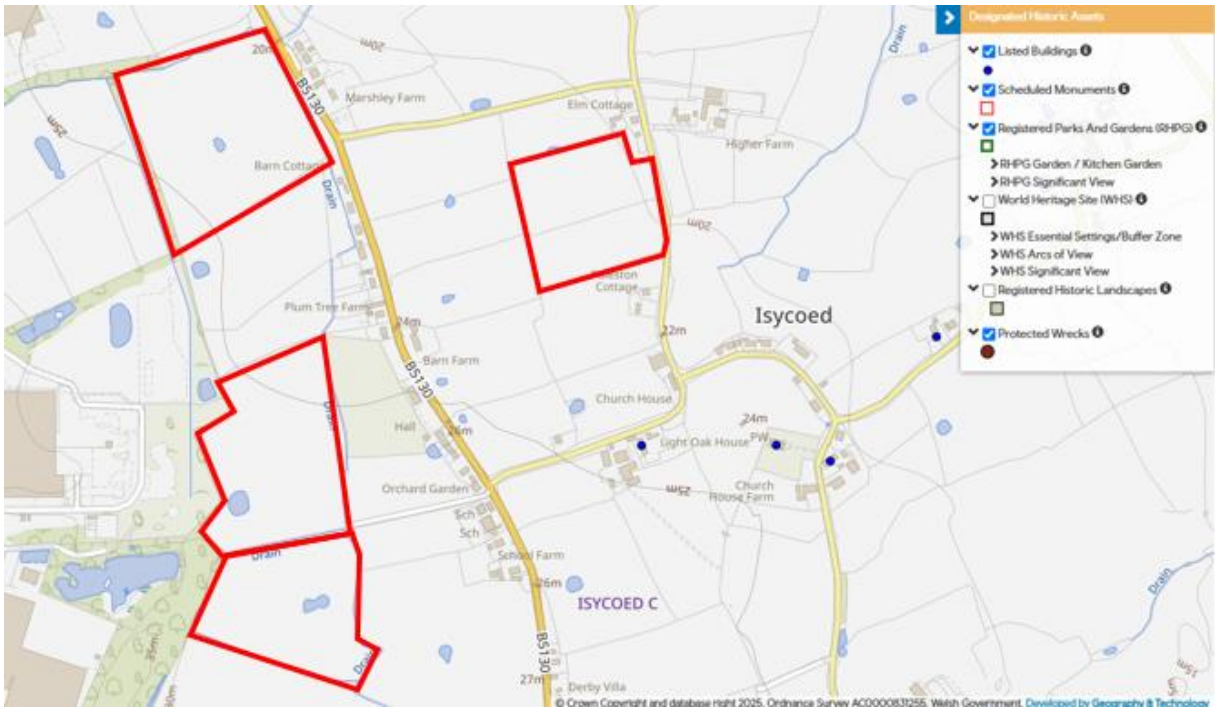


Figure 4. Nearby Listed Buildings and Scheduled Monuments: Southern Ecological Mitigation Area, outlined in red. Cadw, 2025.

Ecology

2.19. Neither the Northern nor Southern Ecological Mitigation Areas are subject to any statutory nature conservation designations.

2.20. There are three internationally designed wildlife sites within 10km of the site, these are Afon Dyfrdwy a Llyn Tegid (River Dee and Bala Lake) which is a Special Area of Conservation (SAC) in Wales and a Site of Special Scientific Interest (SSSI) in England. The river is approximately 3.5km to the east of the Northen Ecological Mitigation Area and approximately 2.5km east of the Southern Ecological Mitigation Area (at its nearest point). The Midlands Meres and Mosses Phase 2 Ramsar Site is 3.3km northwest of the Northern Ecological Mitigation Area and 4.8km northwest of parcel one of the Southern Ecological Mitigation Area, 5.1km from parcel 2 and approximately 5.4km from parcel 3. The Johnstown Newt Sites SAC (Wales) is located approximately 8km southwest of the Northern Ecological Mitigation Area and 8.8km west of the Southern Ecological Mitigation Area.

2.21. A Habitat Management Plan (HMP) has been drawn up by The Environmental Partnership (TEP) as part of this planning application portfolio. The HMP has been split into two reports, with one covering the Northern Ecological Mitigation Area and the other covering the Southern Ecological Mitigation Area.

2.22. The HMP will be reviewed on an annual basis by Net World Sports and/or the appointed managing organisation and other key partners to ensure that the HMP is meeting the original management objectives and responding to the developing needs of the site.

2.23. The annual review will identify the need for additional maintenance operations and inform future management decisions. This can be achieved by:

- Quarterly formal site inspections by the managing organisation to assess the appointed contractor's quality standards and deliverables in line with the HMP;
- An annual site meeting with the managing organisation and stakeholders and the appointed contractor to assess quality standards and deliverables in line with this HMP; and
- Ad hoc unannounced inspections by the managing organisation to review quality of maintenance work and any potential Health and Safety issues.

Northern Ecological Mitigation Area Habitat Management Plan

2.24. The HMP states that there are no notable habitats present on site, however there is a small area of traditional orchard habitat which lies immediately adjacent to the western boundary of the Site and a statutory Main River, Redwither Brook, runs approximately 250m west of the Site.

2.25. [redacted] Badgers and their setts are safeguarded under the Protection of Badgers Act (1991). Under this legislation it is illegal to interfere, damage or destroy a set, obstruct access to a sett, or disturb a badger whilst it is occupying a sett.

Southern Ecological Mitigation Area Habitat management plan

2.26. During the Ecological investigations carried out by TEP, there are three ponds onsite, one of which has tested positive for Great Crested Newts (GCN) in environmental data (eDNA) (testing was undertaken in Spring 2024). The GCN present on site will be allowed to thrive within the additional ponds that will be added to the land.

2.27. Existing hedgerow and grassland throughout the site provides a suitable commuting, foraging, sheltering and hibernating habitat for amphibians. These habitats will be retained in the development, and proposed ponds, thicket/shrub, meadow and wetland grass, marginal planting will provide suitable breeding, foraging, commuting, and sheltering habitat for amphibians, including GCN.

2.28. [redacted]

2.29. The HMP will be reviewed on an annual basis by Net World Sports and/or the appointed managing organisation and other key partners to ensure that the HMP is meeting the original management objectives and responding to the developing needs of the site.

2.30. Following on from the review, the managing organisation will produce an annual report, summarising the management of the Site over the last year. The report will include the key measures achieved, actions going forward and any updates to the maintenance operations if required, and how this information will be communicated to stakeholders.

2.31. Further information on how the proposed habitats created will impact on protected species can be found in the Habitat Management Plan for the Land adjoining the B5130 which has been submitted as part of this application.

2.32. As set out within both HMP's, the Applicant will retain ownership of the land and use a professional management body to undertake maintenance of the site. Further detail on this is provided within the submitted Habitat Management Plans.

Flood Risk

2.33. The Flood Map for Planning, produced by Natural Resource Wales (NRW) identifies both the Northen Ecological Mitigation Area and the Southern Ecological Mitigation Area as being located within Flood Zone 1 for risk of flooding from rivers and seas. Within Flood Zone 1, there is less than 1 in 1000 (0.1%) (plus climate change) chance of flooding in a given year.

2.34. The risk of flooding from surface water maps shows the site as predominantly being in an area at very low risk of overland and surface water flooding, with a number of isolated areas shown to be at a low to high risk of surface water flooding (Flood Zones 2 & 3).

2.35. Within Medium Risk areas, there is less than 1 in 100 (1%) but greater and 1 in 1000 (0.1%) chance of flooding in a given year including taking account of climate change. In areas at High Risk of flooding, there is a greater than 1 in 100 (1%) chance of flooding in a given year, including climate change.

2.36. The flood risk section of Technical Advice Note (TAN) 15 was updated by the Welsh Government in March 2025. The updated TAN places increased emphasis on Local Development Plans as the mechanism for both allocating sites but also identifying flood mitigation measures and assessing risk.

2.37. Through the development proposals for the Ecology Corridor, there is no built development proposed. Therefore, increased flooding risk will not occur on site through this development taking place.

Agriculture

2.38. The agricultural land classification for the Northern Ecological Mitigation Area, is 3B, as denoted on the Welsh Government's "Agricultural land classification: predictive map". Therefore, the land is not considered to be best and most versatile (BMV).

2.39. Similarly to the above, the Southern Ecological Mitigation Area is also considered to be classed as 3B, with a small area at the southern boundary of parcel 3 classed as being 3a which is good to moderate quality agricultural land. The encroachment of this onto the site is demonstrated on figure 6below with the land that is classed as being 3A is the dark green area, the orange area is classed as N/A on the map, and land comprising 3B as the light green area. As shown, the land in question is only a very small part of the site.

2.40. The Predictive Agricultural Land Classification Map has been designed on a 50m raster (gridded squares). Therefore, the reliability of background data (especially soils) will vary. The map is a modelled prediction and not definitive, albeit based on best available data.

2.41. On balance, these parcels do not comprise Best and Most Versatile Land.

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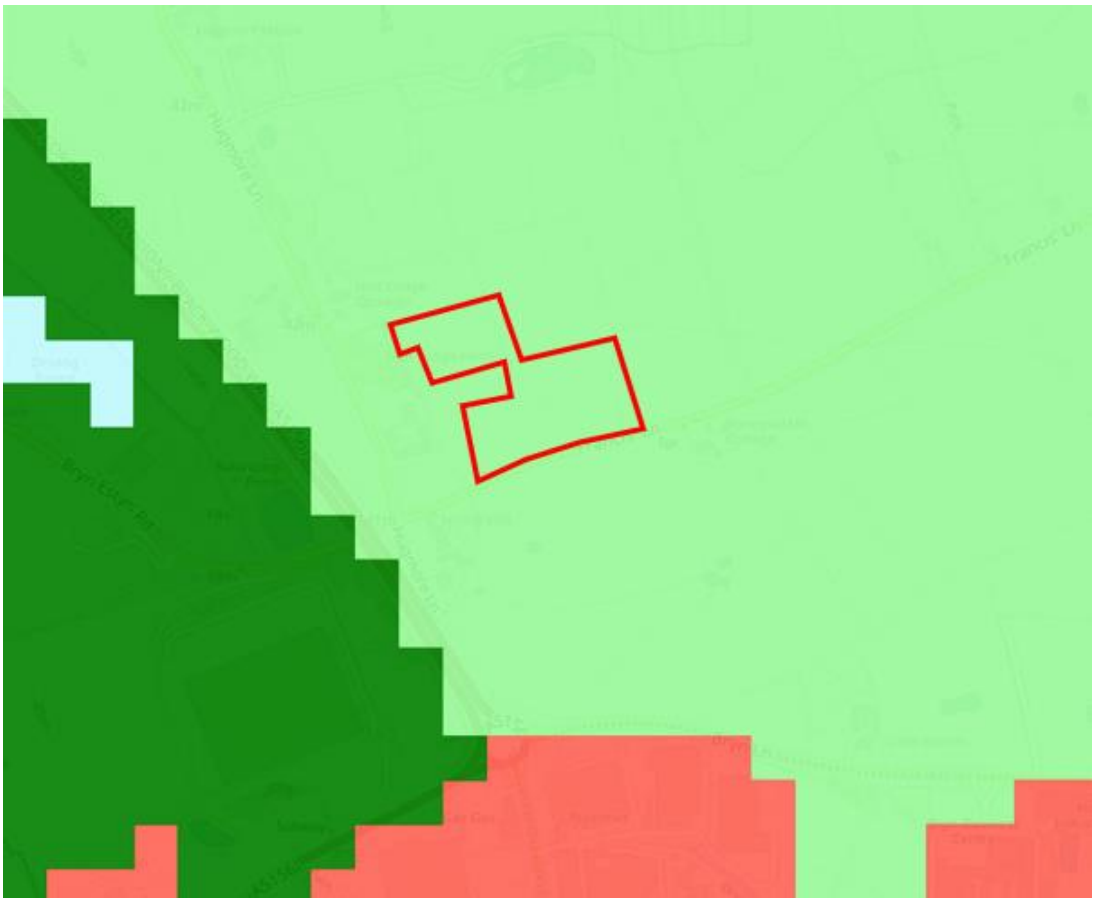


Figure 5. The Northern Ecological Mitigation Aea outlined in red. Welsh Government 2025

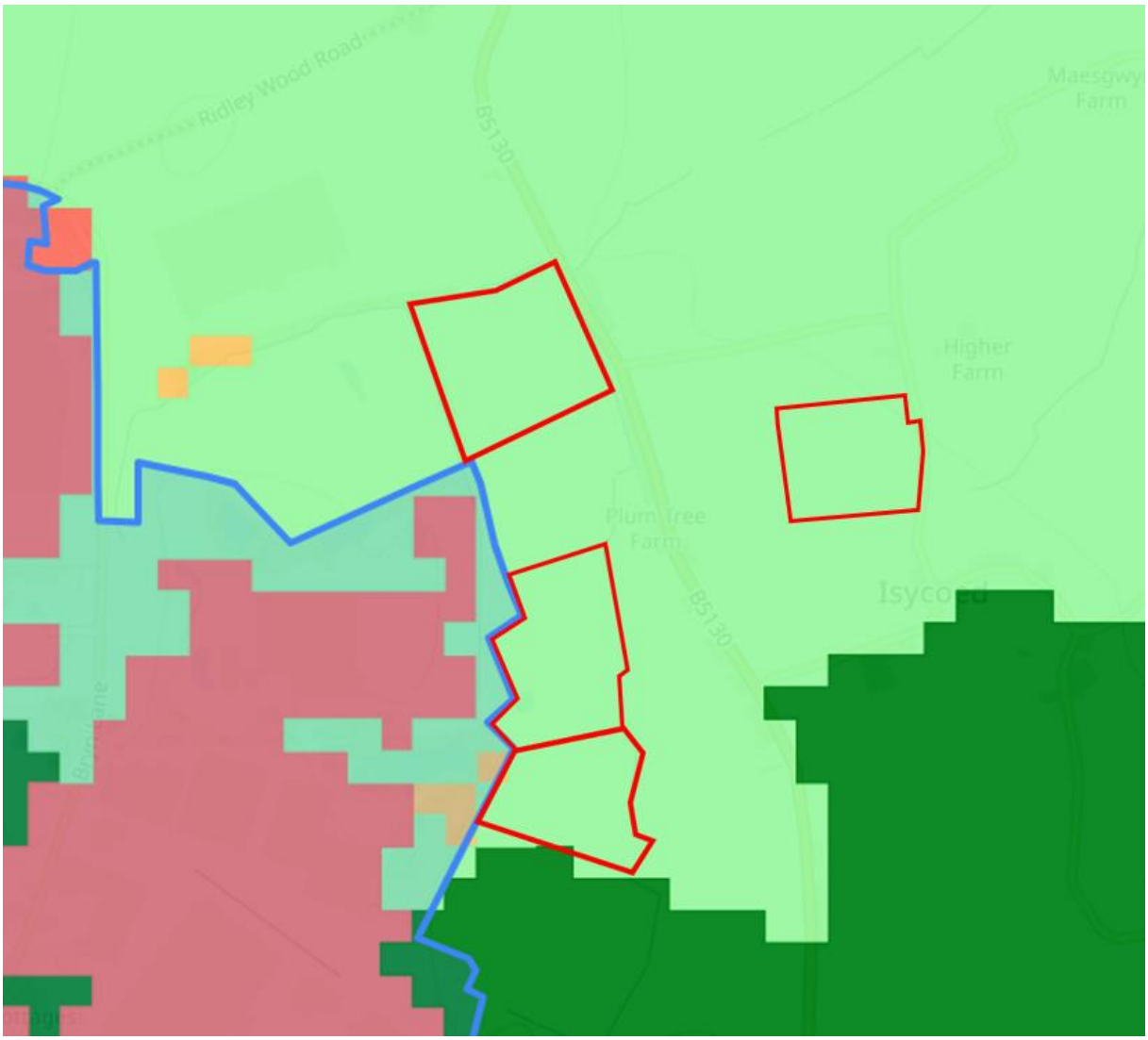


Figure 6. The Southern Ecological Mitigation Area outlined in red. Welsh Government, 2025

Planning History

2.42. A search of the Council's online planning register has been undertaken, and no previous applications relate to the site. However, the relevant planning applications, which are in close proximity to the site, have been identified below.

Table 1: Relevant applications in the surrounding area

Reference	Address	Proposal	Decision
P/2025/0143	Land South of Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9US.	Demolition of existing structures and erection of employment facilities (Class B2/B8) with ancillary office accommodation (Class B1A) including	Validated 17/02/2025 and pending decision.

Reference	Address	Proposal	Decision
		landscaping, parking, access, and other associated works.	
P/2023/0497	Land North Of, Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9US Developer: Net World Sport	Hybrid Planning application seeking: Full planning permission for the demolition of existing buildings and re-profiling of the site for development comprising the severable and phased construction of employment floorspace (Use Class B1C/B2/B8) and ancillary (integral) office floorspace (Use Class B1a) and the provision of associated infrastructure including earthworks, sub-station, parking, landscaping, access from industrial Estate Road roundabout and Bryn Lane and internal estate road; and Outline planning permission for the severable and phased construction of employment floorspace (Use Class B1C/B2/B8) and ancillary (integral) office floorspace (Use Class B1a), ancillary retail and drive thru facilities, a hotel and petrol filing station (Use Class A1/A3/C1/SUI generis) and associated infrastructure including earthworks, internal estate road, parking and landscaping (all matters are reserved for future determination)	Validated 19/07/23 and pending determination

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Reference	Address	Proposal	Decision
P/2023/0280	Land off Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT	Hybrid planning permission (A) Outline Permission (all matters reserved except for means of access) for erection of up to 3 warehouse and distribution units (Use Class B8) and (B) Full planning permission for demolition, means of access, earthworks, drainage, landscaping, ecology zone and relative ecological mitigation measures, and ancillary works.	Submitted 12/04/2023. Approved 05/07/2024

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3. PROPOSED DEVELOPMENT

3.1. This chapter provides a summary of the proposed development, including the use, scale and massing, access, and landscaping strategy.

Description of Development

3.2. The description of development is as follows:

Full Planning Application seeking:

Change of use from agricultural to ecological land use alongside the erection of bunds, access, landscaping, and associated works.

3.3. A summary of the proposed development is provided below, explaining how the proposals are designed in regard to their use, scale and massing, layout, and appearance. A section on access is also included.

Proposed Development

3.4. The Site will be used for ecological purposes which will be provided through the landscaping scheme. The overall aim for the proposed development is to provide connections between the existing established surrounding hedgerows, trees, ponds, and grasslands with the wider Strategic Ecological Network of the Wrexham Industrial Estate.

3.5. The landscape design approach occupies a unique position, as it is involves enhancing and uplifting the existing ecological value of the landscape. The five parcels are currently within an agriculture use, with some ecological value present. Therefore, the development proposal can maximise the sustainable goals of the site and create an ecologically rich area.

3.6. Key landscape design objectives include:

- Preserve and enhance existing valuable trees and vegetation on site to maximise the habitat potential within the area;
- Restore and manage connections and interactions across the landscape, providing an environment for plant species to thrive, and animal species to live, eat and shelter;

3.7. Create connections between existing established surrounding hedgerows, trees, ponds, and grasslands with the wider Strategic Ecological Network of the Wrexham Industrial Estate;

3.8. Increase species diversity and create an uplift in ecological attributes such as pollinator species, breeding sites and wildlife foraging potential; and

3.9. Encourage locally established and appropriate vegetation to re-colonise the fields and ponds and to retain the existing grassland to allow for Natural Regeneration (occurs when an eco-system is able to renew and recover from damage).

3.10. With the exception to the approach for Parcel 5 (Land off Maesgwyn Lane), explained within Paragraphs 3.54 to 3.57 of this Statement, there are five main elements to the landscape schemes which are as follows:

3.11. Bunds will be installed as per the submitted plans on three parcels of the Southern Ecological Mitigation Area, on a natural curve with consistent visual profile aligning with the geotechnical engineering proposals. Angles of slopes will be at a maximum of 1:3 gradient to follow the natural angle of repose for unsupported topsoil.

3.12. Ponds will be incorporated on both sites which will follow the principles set out by the Applicant's Ecologist; The Environment Partnership (TEP).

3.13. The existing ponds on the land will be protected during the construction phase of the development and it will be ensured that good conditions are maintained. Any ditches or smaller linked to ponds will be checked by an ecologist and engineer to ensure drainage patterns are uninterrupted and condition retained.

3.14. Boundary thicket planting makes up part of the proposed development to ensure the hedgerow habitat remains as existing and the thicket planting becomes another layered habitat over time.

3.15. Habitat creation is an important factor of the proposed development. Hibernacula is to be built following TEP guidelines following dimensions, materials, and construction recommendations.

3.16. An existing ditch which is located within Parcel 2 will be retained, with bunds being built around it. This is to protect the ditch's wildlife potential and existing ecosystems that live within this as a result of natural regeneration that has already taken place.

3.17. The proposal will create an ecological buffer between the built development at the Wrexham Industrial Estate and the wider countryside location. They represent an ecological improvement on existing land and a net gain for biodiversity, as illustrated through the following key features in the table below:

Feature	Lost to Development	Proposed – Land off Francis Lane	Proposed – Land adjoining the B5130	Overall Total
Trees	0	38 No.	132 No.	170 No.
Ponds	0	10 No.	27 No.	37 No.
Hedgerow	0m	249 lin.m	56 lin.m	305 lin.m

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Figure 7. Northen Ecological Mitigation Area (Google Maps 2025)

Northern Ecological Mitigation Area

3.18. The Northern Ecological Mitigation Area consists of one parcel of land, which is accessed through an existing access point on the southern boundary off Francis Lane.

3.19. The overall goal for the development is to provide connections between the existing established surrounding hedgerows, trees, ponds, and grasslands with the wider Strategic Ecological Network of the Wrexham Industrial Estate.

3.20. The Proposed Development for The Northern Ecological Mitigation Area includes creating 10 wildlife ponds, seven of which are deeper pools, with three being shallow pools of water.

3.21. The existing hedgerow and vegetation location around the edge of the land will be retained and enhanced with the planting of additional trees, as well as Native Thicket (scrub) planting to further improve the boundary lines.

3.22. There will be an additional 38 no. trees planted on site though this development proposal.

3.23. The existing grassland which is on site will be retained as much as possible throughout and following earthworks, excavations and ground repair and will be left to allow for Natural Regeneration.

3.24. The 7 deep ponds (max 1.5m) present on site will have wet grassland seeding around the edges along with aquatic planting which will also be left to regenerate naturally overtime.

3.25. Within the site there will be log piles created along with Amphibian Hibernacula which will help attract more wildlife to the site in the form of amphibians.

3.26. The ponds and planting will increase species diversity, start to create a range of linked habitats, and provide an uplift in ecological attributes such as pollinator species, breeding sites and wildlife foraging potential.

3.27. The land will be left to naturally regenerate, however, if after 2 growing seasons no natural regeneration has been achieved, wildflower grass and aquatic marginal planting mixes can be planted on site. The wildflower species rich meadow mix is suggested for the western slopes to achieve a diverse flowering mix to support the ground level grassland. These western slopes will be backfilled with 'nutrient poor' subsoils that are available on site to create the right environment for wildflower establishment.

The Southern Ecological Mitigation Area

3.28. As discussed previously, this consists of four separate parcels of land as illustrated below. These include three parcels of land adjoining the B5130 and one parcel of land off Maesgwyn Lane.

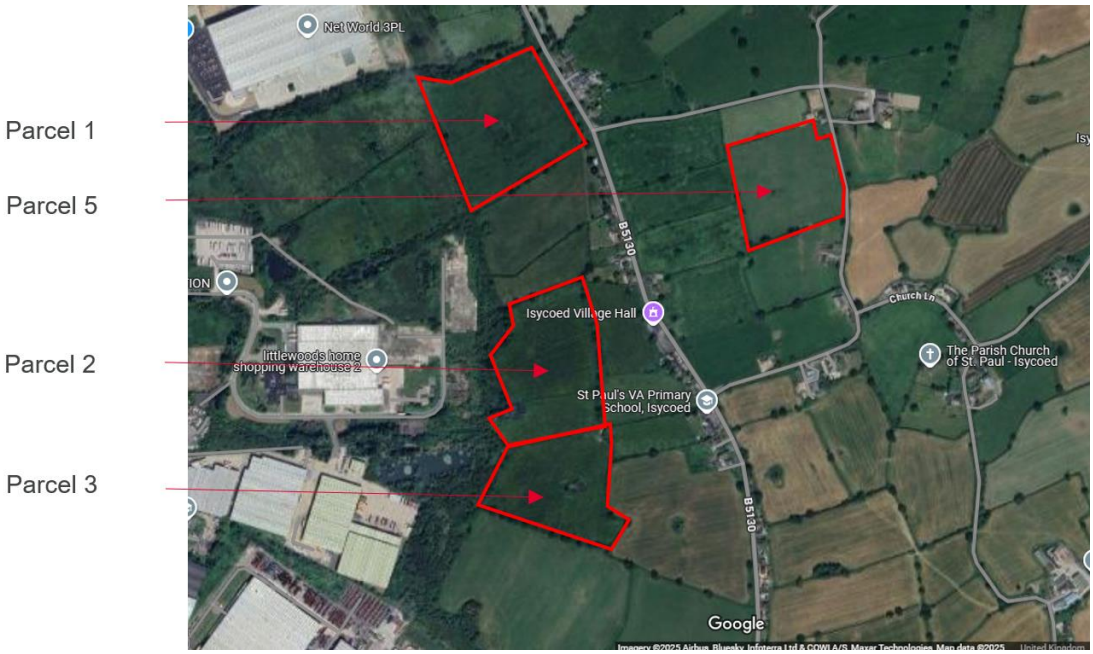


Figure 8. The Southern Ecological Mitigation Area. Google Maps, 202

3.29. Each of the four parcels will be discussed separately when reviewing their design. The submitted plans also reviews each parcel in detail, which can be referred to.

Parcel 1:

3.30. As existing, there is a single pond on the land, which is located towards the middle of the site. Grassland surrounds the pond with the boundary being made up of trees and hedgerow. To the east of the land, there is an offsite ditch/watercourse which is out of the red line boundary for the proposed development.

3.31. The land currently offers very little ecological enhancement, and therefore, when designing how the site could be used to its best potential, it was felt that much more could be done to help strengthen the biodiversity presence on the land.

3.32. The site will remain the same as it currently is, however, there will be enhancements made to accommodate wildlife on site. The changes include creating 10 additional ponds, with the existing pond also being retained. The addition of these ponds will significantly enhance the biodiversity of the landscape and create thriving ecosystems which support a wide range of species including plants, amphibians, birds, and mammals.

3.33. Around the new ponds, the proposals demonstrate how aquatic planting will occur which will be left to naturally regenerate over time. If the regeneration of the aquatic planting is unsuccessful after two growing seasons, a wetland meadow mix will be planted in its place.

3.34. Along the western boundary of the parcel, there will be a bund created, which will run in a north south direction. The bund will be installed on a natural curve with consistent visual profiling aligning with the geotechnical engineering proposals. The angles of the proposed slopes will be at maximum 1:3 gradients to follow the natural angle of repose for unsupported topsoil.

3.35. Along the eastern side of the bund, there will be additional select standard trees (8-10cm girth) planted as well as a native thicket (scrub) mix planted as whips/transplants (60-90cm in height). The trees and scrub mix will be planted within a 1.5m grid in order to provide a mixed height native planting matrix.

3.36. Towards the lower part of the bund, there will be larger canopy species planting at higher positions within the slopes which will provide ground stabilisation and visual screening following establishment.

3.37. There will be areas of canopy trees to the base of the bunds to follow the landscape character of the surrounding area within its large Oak trees and similar local species.

3.38. The existing grassland/meadow on site will be retained and allowed to regenerate over time. The grassland on the western slope of the bund will be species rich, with various habitat creation elements being incorporated such as log piles, bare earth scrapes for butterfly and bee habitats and rock piles for amphibians.

3.39. 51 new trees are proposed to be planted around the site. This will be in addition to any existing trees already present at the parcel. No trees will be lost through this proposal.

Parcel 2:

3.40. The land is currently made up of grassland/meadow with hedgerows and trees present along the boundary of the land. There is currently one pond on site which is located towards the south-western

part of the land. A small water course runs from the pond in an existing ditch which cuts across the width of the site.

3.41. As demonstrated within the proposed site plan, the existing pond, watercourse, grassland, trees, and hedgerows will be retained on site. There will be the addition of 11 new ponds, which will be located towards the centre and east of the site. Aquatic planting will occur around the ponds, which should be able to naturally regenerate. If the regeneration fails however, wetland meadow can replace the planting after two failed growing seasons.

3.42. There will be two bunds incorporated in the design for Parcel 2. Which will run along the western boundary of the site and will have a maximum gradient of 1:3 to follow the natural angle of repose for unsupported topsoil.

3.43. The reason for the two separate bunds is due to a wildlife rich ditch which cuts across the parcel of land. The ditch is rich in biodiversity, with water, grassland and plants present throughout. When designing this scheme, the importance of keeping it was identified and therefore, the proposed ecological enhancement of the site has been designed around this feature.

3.44. Rock piles will be introduced on the western side of the bunds which will encourage amphibian habitat creation as well as bare earth banks which will attract butterflies and bees.

3.45. To improve the boundaries, the plans propose native hedgerow infill, which will further help encourage the growth of habitats within them, and to create strong buffers between the industrial estate and the Strategic Ecological Corridor.

3.46. The scheme can be achieved by creating the correct soil conditions, allowing Natural Regeneration, and implementing the correct species to achieve this.

3.47. 48 new trees will be planted on site, which will mainly be located along the boundaries of the parcel. The trees will be standard trees underplanted with native thicket mix, below thicket mix, fescue & bent grass mix within planting matrix for weed control. There will also be an additional 56 lin.m of hedgerow planted on site, in addition to the hedgerow currently present on the land.

Parcel 3

3.48. Similar to other parcels, this comprises grassland, with one pond towards the east of the site. There are also mature trees present along the boundaries of the land, with trees also located within the centre of the land.

3.49. The existing grassland/meadow will be retained and left to regenerate over the years. This will then create a stronger habitat for the ecology on site.

3.50. The site currently has one pond, which will be retained along with the addition of six new ponds located to the centre and east of the site. As with the first two parcels, the ponds will have aquatic planting surrounding the water, with the backup option of having wetland meadow mix planting if the aquatic plants do not regenerate after two growing seasons.

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3.51. There will be a small bund located on the western part of the land, in line with the bunds within parcels 1 and 2. There will be 6 new ponds on site, with the one existing pond being retained. As well as this, additional tree planting will occur on the land.

3.52. To keep in line with the first two parcels, rock piles will be present to the west of the bund to encourage amphibian habitats to thrive. As well as this, bare earth butterfly and bee banks will be incorporated to help establish these species within the area.

3.53. An additional 33 trees will be planted on Parcel 3, in addition to those which are already present. There will be no change to the amount of hedgerow which is present on the land.

Parcel 5:

3.54. Parcel 5 is located off Maesgwyn Lane, nearby to Parcels 1,2 and 3. This was introduced as part of the Strategic Ecology Corridor after the pre-application consultation with NRW. The Applicant owns this parcel of land and therefore is able to offer it for further off-site mitigation.

3.55. The land is 3.44 ha in size and will be used for ecology sensitive agricultural purposes, as set out within the 'Land adjoining the B5130 Habitat Management Plan'.

3.56. Unlike the other parcels being brought forward within this planning application, Parcel 5 is not proposed for any physical changes. Currently the land is open fields which are used for agriculture, with a pond, grassland, trees, and hedgerow present around the parcel's boundary and within the field. There will be no change to the existing vegetation on site, however the land will be managed due to the vegetation and ponds present there.

3.57. This land will not have any changes made to it; however, it will be protected for its proposed use as ecology land going forward. As a result, aside from an existing site plan, there are no submitted landscaping drawings for this parcel of land. Similarly, no ecological surveys are considered necessary.

Access

3.58. None of the parcels being put forward as part of this development are intended to be publicly accessible, aside from construction and maintenance. However, there is a Public Right of Way connecting the B5130 and Bryn Lane on site currently. This will remain as existing.

3.59. Access for the Southern Ecological Mitigation Area will be achieved via existing routes off the B5130 and Maesgwyn Lane for pedestrians and vehicles. The access points have been historically used when the fields were in an agricultural use.

3.60. Access for the Northern Ecological Mitigation Area for pedestrians and vehicles will be achieved from Francis Lane, through an existing access point which has been used historically when the land was used for agriculture.

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Phasing

3.61. The Proposed Development will be brought forward in a phased approach, recognising that land may not be needed until a point in the future where development on the sites referenced within Paragraph 1.3 are brought forward.

3.62. The Applicant's Landscape Architect, Nicholsons, have produced an initial phasing plan which sets out which land will be developed first. This has been submitted as part of this planning application and an extract provided below.

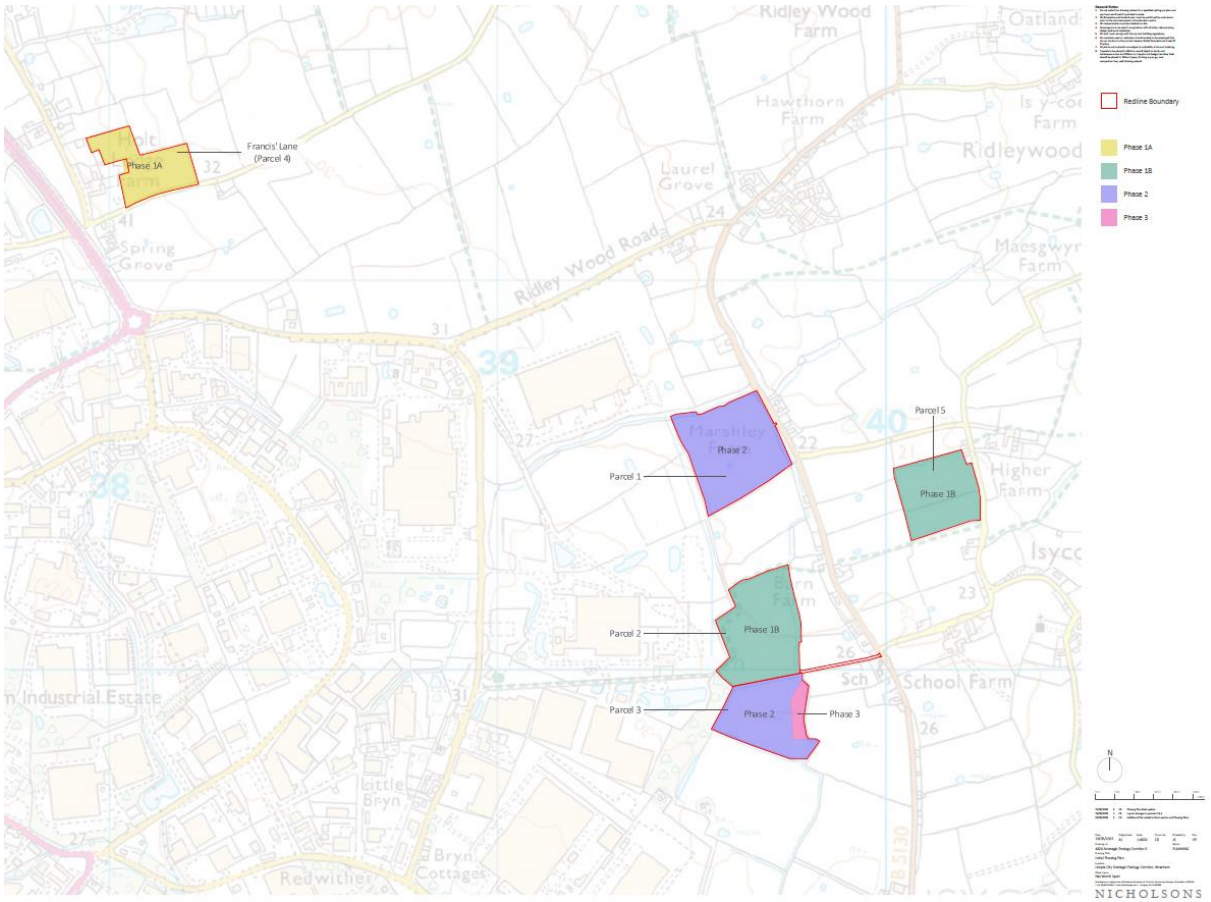


Figure 9. Phasing Plan. Nicholsons, 2025.

3.63. This Proposed Development has been brought forward to mitigate for any biodiversity loss which has been caused by the following planning applications, complementing any on-site provision:

3.64. Land North of Bryn Lane, Wrexham – also known as Utopia City and subject to a live hybrid planning application (red: P/2023/0497). This will be mitigated via the land within Phases 1A (detailed element) and 1B (outline element), identified as the green and yellow land in the drawing above. This site is intended to be built out first, which is why the mitigation sites relating to this are being prioritised.

3.65. Future planning application to extend the existing Net World Sports Headquarters will also be linked to the Strategic Ecology Corridor. Any impact from this scheme will be mitigated via the land within Phase 2, identified as the purple land in the drawing above.

3.66. Land South of Bryn Lane, Wrexham – subject to a live full planning application (ref: P/2025/0143) – will be mitigated via the land within Phase 3, identified as the pink land in the drawing above.

4. PLANNING POLICY FRAMEWORK

4.1. The provisions contained within Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 require applications for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

4.2. The Development Plan for this site consists of the adopted Wrexham Local Development Plan (LDP) (adopted December 2023) and Future Wales: The National Plan 2040 (adopted February 2021). Other relevant material considerations include Planning Policy Wales (edition 12, February 2024) and other relevant local planning guidance notes and technical advice notes.

Legal judgements

4.3. Producing the LDP took many years, before being found "sound" by the Planning and Environment Decisions Wales (PEDW) on 27 February 2023. WCBC then subsequently voted not to adopt the LDP on 19 April and 14 June 2023.

4.4. A Judicial Review (JR) of those decisions was lodged by a consortium of developers (not including the Applicant) and heard by the High Court in November 2023. At this, these decisions were quashed, and the Council were directed to adopt the LDP, which WCBC did in December 2023.

4.5. On 31 January 2024, a JR was launched into the High Court decision with a hearing taking place in October 2024. The judgement ("the Court of Appeal Decision") was handed down on 20 December 2024 and subsequently the Welsh Government unsuccessfully applied to the Supreme Court in January 2025 to be allowed the opportunity to appeal. In tandem with the above a second legal challenge was lodged under Section 113 of the Planning and Compulsory Purchase Act 2004 (PCPA) ("the Section 113 Case"). This seeks to quash the LDP; however, there has been no decision made at time of submission.

4.6. Therefore, currently, the LDP remains an adopted document and remains relevant for decision-making in Wrexham. However, should the Section 113 legal challenge be successful, the Unitary Development Plan 2005 would likely become the relevant Development Plan Document for Wrexham. For completeness, this Statement considers the UDP alongside the LDP.

Wrexham Local Development Plan (LDP)

4.7. The Wrexham LDP is the planning policy document for the County Borough of Wrexham. It sets out key policies and land use allocations that will shape the future of Wrexham and guide development up to 2028. The Wrexham LDP replaces the previously adopted Wrexham Unitary Development Plan.

4.8. The LDP provides a spatial framework underpinned by the principles of sustainable development. It also provides a policy framework that integrates social, environmental, and economic issues relevant to the people who live, work, and visit the County Borough of Wrexham.

4.9. The following are considered to be relevant policies and objectives within the LDP:

4.10. **Objective SO7** – Conserve, enhance and promote the local character and distinctiveness of Wrexham which will be achieved by respecting the character and distinctiveness of places, buildings and landscapes through the careful design and siting of development.

4.11. **Objective SO9** – Protect, manage, and enhance the natural and historic environment and landscapes which will be achieved by conserving and enhancing the natural, landscape and historic environment, ensuring appropriate protection is given to designated and non-designated assets, including their wider settings. Respecting the character and distinctiveness of places, building and landscapes through the careful design and siting of development is also extremely important.

4.12. **Objective SOC10** – maximise resistance to and prepare for the consequences of climate change by reducing carbon emissions and using a green infrastructure-based approach to the planning and design of new development.

4.13. **Policy SP5: Planning Obligations**. 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.

4.14. **Policy SP9: Wrexham Industrial Estate.** The County's Key Business Sector Are and will be the primary focus for new employment development over the pan 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.

4.15. **Policy SP10: KSS3 Land to the North of Bryn Lane, Wrexham Industrial Estate**. Land is allocated to the north of Bryn Lane, Wrexham for 28ha of new employment land for B use class purposes, including an ecological network and residential buffer zone.

4.16. **Policy SP11: Transport and Accessibility**. Wrexham's transport network will be developed in a safe, efficient, and sustainable manner. This will be achieved by restricting development that would have an unacceptable impact on the safe and efficient operation of the transport network.

4.17. **Policy SP12: Design Principles and Master Planning Framework**. 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. Proposals must demonstrate how they have taken account of the local characteristics of surrounding areas.

4.18. **Policy SP13: Health and Well-being**. All development should seek to reduce health inequalities and provide opportunities for improving health and wellbeing.

4.19. **Policy SP14: Natural Environment**. Development will only be permitted where it seeks to protect, conserve, and enhance the natural environment including the strategic ecological network on Wrexham Industrial Estate.

4.20. **Policy SP15: Historic and Cultural Environment**. Development will only be supported where it conserves, protected, and enhances cultural and heritage assets of the Borough and their settings, including archaeological remains.

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4.21. **Policy SP18: Climate Change**. To mitigate against the effects of climate changes and adapt to its impacts, development proposals will need to demonstrate that they have taken into account measures set out.

4.22. **Policy SP19: Green Infrastructure**. Development will be required to maintain the extent, quality, and connectivity of multi-functional green infrastructure on or near a site and, where appropriate, to enhance it.

4.23. **Policy DM1**: **Development Management Considerations**. Development must accord with or enhance the character and local distinctiveness of a site in terms of their siting, layout, scale, height, density, and landscaping.

4.24. **Policy NE3**: **Trees, Woodlands, and Hedgerows**. Development will only be permitted where it does not cause unacceptable harm to trees and hedgerows of significant public amenity, natural or cultural heritage value, or those that provide important ecosystem services.

4.25. **Policy NE6**: Wastewater Treatment and River Water Quality. All new development will only be permitted where there is no adverse effect on the integrity of the River Dee and Bala Lake SAC in particular through treatment of wastewater.

4.26. **Policy CF1: Protection of Existing Open Space, Sport, and Recreation Facilities**. Proposals which seek to protect, manage, and enhance the existing network of diverse, multi-functional open spaces will be supported.

Wrexham Unitary Development Plan (UDP)

4.27. For completeness, this Planning Statement also references policies from WCBC's Unitary Development Plan which was adopted in February 2005 covering a period from 1996 to 2011. This means that – if relied upon for decision-making, the UDP would be severely out of date. However, noting that WCBC may decide to do this, the Proposed Development has been considered against the UDP.

4.28. The following are considered to be relevant policies within the UDP:

4.29. **Policy PS2 The Broad Location of Development -** Development must not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment.

4.30. **Policy PS11 Biodiversity** - Priority will be given to proposals that enhance the biodiversity value of sites and support the creation of local nature reserves, ensuring the protection and enhancement of the land's natural conservation and landscape qualities.

4.31. **Policy GDP1 Development Objectives** – Development should be appropriately scaled, designed, and laid out to align with the site's characteristics while enhancing the appearance of the surrounding area.

4.32. **Policy EC4 Hedgerows, Trees, and Woodland** – Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodlands, wildlife and other natural landscapes and water features.

4.33. **Policy EC6 Biodiversity Conservation** - Development within or near sites of biodiversity interest will only be permitted if it can be clearly demonstrated that the development's necessity outweighs the need to protect the site's intrinsic nature conservation value. If such development is approved, any damage must be minimised, and appropriate mitigation measures must be implemented.

4.34. **Policy EC13 Surface Water Run-Off** - Development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted.

4.35. **Policy E1 Employment Allocations –** Sufficient land will be allocated for employment development between 2001 and 2011 at Wrexham Industrial Estate.

4.36. **Policy CLF Informal Recreation** – The existing pattern of public rights of way will be protected, maintained, and improved and any potential new routes will be identified and safeguarded.

4.37. **Policy T9 Walking, Cycling and Horse-Riding Routes** - Development proposals must, where feasible and appropriate, include walking and cycling routes that connect to existing or planned networks and integrate seamlessly with the public transport system.

Future Wales: The National Plan 2040

4.38. Future Wales: the National Plan 2040 is the national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems, and improving the health and well-being of our communities.

Planning Policy Wales

4.39. Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which, together with PPW, provide the national planning policy framework for Wales.

4.40. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.

4.41. Relevant Technical advice notes (TANs) include:

- **TAN 5:** Nature conservation and planning (2009)
- **TAN 11:** Noise (1997)
- **TAN 12:** Design (2016)
- **TAN 15:** Development and Flood Risk (2025)

- **TAN 24:** The Historic Environment (2017)

WCBC Local Planning Guidance Notes

4.42. WCBC has approved a series of local planning guidance notes that amplify the Development Plan policy. The following Guidance Notes are considered relevant to this application:

- Landscape and Development (Local Planning Guidance Note NO.7)
- Trees and Development (Local Planning Guidance Note No.17)
- Landscape and Industrial Development (Local Planning Guidance Note No26)
- Wrexham Industrial Estate Employment and Nature Conservation (Local Planning Guidance Note No.29)
- Biodiversity and Development (Local Planning Guidance Note No.32)

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5. PLANNING ASSESSMENT

This section will address the compliance of the proposed development with regard to the adopted Development Plan and other material considerations highlighted in the earlier sections. In terms of the proposal, it is considered that the principal issues relate to:

- Principle of development
- Design
- Ecology
- Landscape strategy
- Ground Conditions
- Impact on residential amenity

Principle of Development

Policy and Guidance

5.1. LDP Policy SP9 confirms that the Country's key Business Sector Area is Wrexham Industrial Estate, as shown on the LDP Policy Map. This policy will support schemes within the industrial estate for new employment development. This development of new high-quality employment space will attract new occupiers to the state and expand existing businesses in accordance with LDP Policy SP9.

5.2. LDP Policy SP8 ensures continued economic growth, employment, and enterprise within the County Borough and the wider region. The plan aims to do this by diversifying the economy and widening the economic base by expanding the Wrexham Industrial Estate by 28ha.

5.3. Future Wales Policy 20 seeks to support growth and investment by focusing development in National Growth Areas. These areas are identified as Wrexham and the Wrexham Industrial Estate, Broughton, Buckley, Deeside, and the Deeside Industrial Park. The proposed development aligns with the Borough and Wales' long-term economic strategy and would deliver on the Local Authority's regeneration aspirations.

5.4. UDP Policy E1 highlights Wrexham Industrial Estate as the key focus for growth and new employment development within the region to support economic growth and job creation.

5.5. Technical Advice Note 23, "Economic Development," provides guidance to planning authorities on economic development. The guidance encourages economic development to be delivered in the most efficient, sustainable, and generally appropriate location, which supports the region's future economic growth.

Compliance of the Proposed Development

5.6. The Proposed Development is located on the edge of an existing employment area identified to support continued economic growth, employment, and enterprise within the County Borough and the wider region within the LDP and UDP.

5.7. As demonstrated in LDP Policy SP14 and UDP Policy EC6, the protection, conservation and enhancement of the natural environment will allow for appropriate development to balance environmental, economic, cultural, and social needs. Appropriate development will need to conserve and enhance valued countryside landscapes, wildlife and minimise harmful impacts on biodiversity and landscape character. New development should also identify and provide, where possible, mitigation and compensation for environmental loss.

5.8. Noting the requirement of TAN5, the following observations are made noting the recognised importance of demonstrating conservation and enhancement:

- Enhancement – The proposal of having the Strategic Ecology Corridor located to the north and east of Wrexham Industrial Estate will enhance the existing biodiversity on site as well as help it to flourish. The scheme has been designed with the overall aim to prove connections between existing and established surrounding hedgerows, trees, ponds, and grasslands with the wider Strategic Ecological Network of the Wrexham Industrial Estate. The existing ecological features on the land will be kept, with an increase of other features present on the site.

- Conservation – The development proposals will not take away ecological features which are already present on site, nor will it cause any negative impacts on the biodiversity present. The importance of not impacting on the existing sites is recognised and therefore the proposals use the existing sites as a baseline, with improvements and enhancements on top to maximise the ecological benefits that the sites can offer.

5.9. This development proposal has been brought forward to mitigate any biodiversity loss which has been caused by the following planning applications:

- Land North of Bryn Lane, Wrexham – also known as Utopia City and subject to a live planning application (red: P/2023/0497);

- Land South of Bryn Lane, Wrexham – subject to a live planning application (ref: P/2025/0143); and

- Future planning application to extend the existing Net World Sports Headquarters.

5.10. The development proposal will allow for the above current and future applications be able to contribute to a biodiversity net gain, through on and off-site provision. This will allow for the development proposals to successfully accommodate both employment growth and ecological enhancement, both of which have a strong focus within the Wrexham Local Development Plan as well as nationally.

5.11. Having the mitigation area together, rather than on the separate application sites, means there is an increased potential for habitat connections to be made, without the disturbance of built development. Furthermore, this promotes a strategic approach, linking in with the FI Real Estate Ecology Site which is the field located between Parcel 1 and Parcel 2 within the Southern Ecological Mitigation Area. This

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linear development of ecological sites will create a boundary for the industrial estate, separating the industrial units and the residential dwellings and fields.

5.12. Paragraphs 3.61 to 3.66 explain the phasing approach for the Proposed Development and how this relates to the schemes referenced in Paragraph 5.9. This is expanded upon in the table below, demonstrating the overall percentage of land given over to ecological purposes.

Scheme	**Site Area – off-site Mitigation**	**% of development site area (including on-site mitigation)**
Utopia City	12.23ha	50%
Land South of Bryn Lane	0.5ha	45%
HQ Extension	8.14ha	Targeting ≥100% (final number subject to design work for on-site mitigation).

5.13. The overall mitigation area for Land South of Bryn Lane (Phase 3) is proposed as being 45% which is in line with other projects within the Wrexham Industrial Estate, such the approved "Kingsmoor" scheme (P/2023/0280).

5.14. The overall mitigation area for Utopia City (Phase 1A and 1B) is 50% which has been agreed in dialogue with NRW.

5.15. For the extension of the Net World Sports Headquarters, the development would result in a loss of land which was previously proposed for ecology purposes. Therefore, a significant uplift is necessary to mitigate any development occurring onsite. For this reason, the percentage of the development site (i.e. the land required to build the extension) which is being mitigated off site should target exceeding 100%.

5.16. The land being put forward in this proposal as the Strategic Ecology Corridor will be protected from built development, as the importance of providing ecological mitigation for other sites is understood. Therefore, this proposal will mean that land being put forward will be left to regenerate overtime, with management from Mauna Kea, a fully owned subsidiary of Net World Sports.

5.17. The Applicant would be supportive of a Grampian Condition being used as a mechanism to link the Proposed Development with the applications referenced in Paragraph 5.9. We would be open to further discussions on this with Wrexham Borough Council to agree wording and the appropriate trigger to confirm when the relevant phase within the Proposed Development should be delivered.

Design (Architecture & Landscape)

Policy and Guidance

5.18. Planning Policy Wales sets out that good design is fundamental to creating sustainable places where people want to live work and socialise with design not just being about good architecture but about the relationship between all elements of the natural and built environment. Specifically, TAN 12 Design sets out the objectives of good design and there is a focus on collaboration of design.

5.19. UDP Policy GDP1 sets out how amenity of the public should be safeguarded. LDP Policy SP12 states that all development will be required to be of a high-quality sustainable design, which makes a positive contribution to the creation of locally distinct places, ensuring compliance with the specific master planning frameworks.

Compliance of the Proposed Development

5.20. Overall, the Proposed Development has been designed with regard to the design-based policies strategy development plan and the PPW guidance on good design as well as all other material considerations.

Landscaping

5.21. The approach to landscape architecture is important to the Site, noting the connections it would bring to the existing Strategic Ecological Network of Wrexham Industrial Estate.

5.22. The landscape strategy prepared and submitted as part of this planning application sets out the effects upon the character of the Site and its immediate setting, and that of the surrounding published character. In summary, ecology features have been created to connect this proposed Strategic Ecology Corridor to the existing Strategic Ecological Network around Wrexham Industrial Estate.

5.23. No existing features on the parcels of land being put forward as the Strategic Ecology Corridor have been lost and therefore all impacts on the land can be considered as being positive.

5.24. It is therefore considered that the landscape strategy conforms with the aims set out in the national and local policies in terms of enhancing biodiversity and preventing harm to existing features, with new planting schedules in place.

Ecology

Policy and Guidance

5.25. Ecology is considered in the submitted Ecological Impact Assessments produced by TEP.

5.26. There are five sites within the National Sites Network located within 10km of the Northern Ecological Mitigation Area. The Midland Meres and Mosses Phase 1 Ramsar (designated in both England and Wales), which is located approximately 3.0km northwest of the site and is designated for supporting a diverse range of habitats and rare plant and insect species. The River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC (designated in both England and Wales), which is located approximately 3.7km east of the site and is primarily designated for its water courses of plain to montane levels with Ranunculion Fluitantis and Callitricho-Batrachion vegetation, and for supporting floating water plantain Luronium Natans and Atlantic Salmo Salar. Finally, the Johnstown Newt Sites SAC (Wales) is located

approximately 8km southwest of the site and is designated for its Great Crested Newt Triturus Cristatus population.

5.27. There are four Sites of Special Scientific Interest (SSSI) located within 5km of the Southern Ecological Mitigation Area. These are the Afon Dyfrdwy (River Dee) SSSI (Wales and England) which is located approximately 1.7km east of the site and is of interest for its range of river habitat types, saltmarsh transition habitats and populations of notable species including plants, fish, aquatic invertebrates and other *Lutra Lutra.* Vicarage Moss SSSI (Wales) is located approximately 4.6km northwest of the site and is of botanical interest; and the Dee Cliffs, Farndon SSSI (England), which is located approximately 4km northeast of the site and is of geological interest only, excluding it from further consideration.

5.28. PPW (para 6.4.11) advises that planning authorities must follow a stepwise approach to maintain and enhance biodiversity, build resilient ecological networks, and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimised, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.

5.29. PPW requires developments to minimise impacts on ecosystems and to positively impact local biodiversity. Technical Advice Note 5 Nature Conservation and Planning is a key TAN in relation to nature conservation and biodiversity.

5.30. PPW states that "*Planning authorities should protect trees, hedgerows, groups of trees and areas of woodland where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial and identified green infrastructure function"* (para. 6.4.25).

5.31. UDP Policy EC4 states that development proposals should incorporate the conservation and management of hedgerows, trees, and other landscape features, along with new planting, to enhance the character of the landscape. This is emphasised further by LDP Policy NE3 Trees, Woodlands and Hedgerows sets out that development will only be permitted where it does not cause unacceptable harm to "trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value or those that provide important ecosystem services."

5.32. UDP polices EC6, PS11 and LDP policies SP14, SP19 and NE3 detail the need to protect and enhance biodiversity. Harm should be kept to a minimum, and compensatory measures should be provided in instances where harm does occur.

5.33. LDP policy SP9 governs the Wrexham Industrial Estate and notes that land is protected on the estate for a strategic ecological network for a few local, national, and internationally protected species and habitat.

Compliance of the Proposed Development

5.34. There will be no impact on any existing trees, ponds or hedgerows from the proposals that are being brought forward. TEP have produced two ecology reports, reviewing the parcels of land as well as two Habitat Management Plan's which have been submitted as part of this planning application.

5.35. The Northern Ecological Mitigation Area will have an additional 38 no. trees planted as well as an additional 10 ponds created and 249 lin.m of hedgerows.

5.36. The Southern Ecological Mitigation Area will have an additional 132 no. number trees will be planted on site, as well as an additional 27 ponds created and 56 lin.m hedgerows. In addition to this, the bunds that will be present within the parcels making up the Southern Ecological Mitigation Area will allow for increased habitats of amphibians, bees, and butterflies with the proposed ponds increasing aquatic species present on site such as newts and plants.

5.37. The Ecological Impact Assessment confirms that the River Dee and Bala Lake (Afon Dyfrdwy a Llyn Tegid) SAC is designated for its water courses of plain to montane levels. Given the distance between this designation and the sites, no impacts to this internationally designed site are anticipated from the proposals. As well as this, given the distance of the sites to the Midland Meres and Mosses Phase 2 Ramsar, no impacts to this designated site are anticipated. There are also no anticipated impacts from the proposal on the Johnstown Newt Sites SAC.

5.38. The development proposals will require the permanent loss to some of the grassland habitats within the site to facilitate the implementation of new ponds and habitat creation within the site. The existing trees present around the sites within the boundary along with hedgerows and ponds which are all to remain within the scope of the works. Therefore, no implications are anticipated with these habitats within the sites. Appropriate tree protection measures will need to be put in place to ensure an adequate habitat buffer from retained trees is maintained from the proposed development during construction.

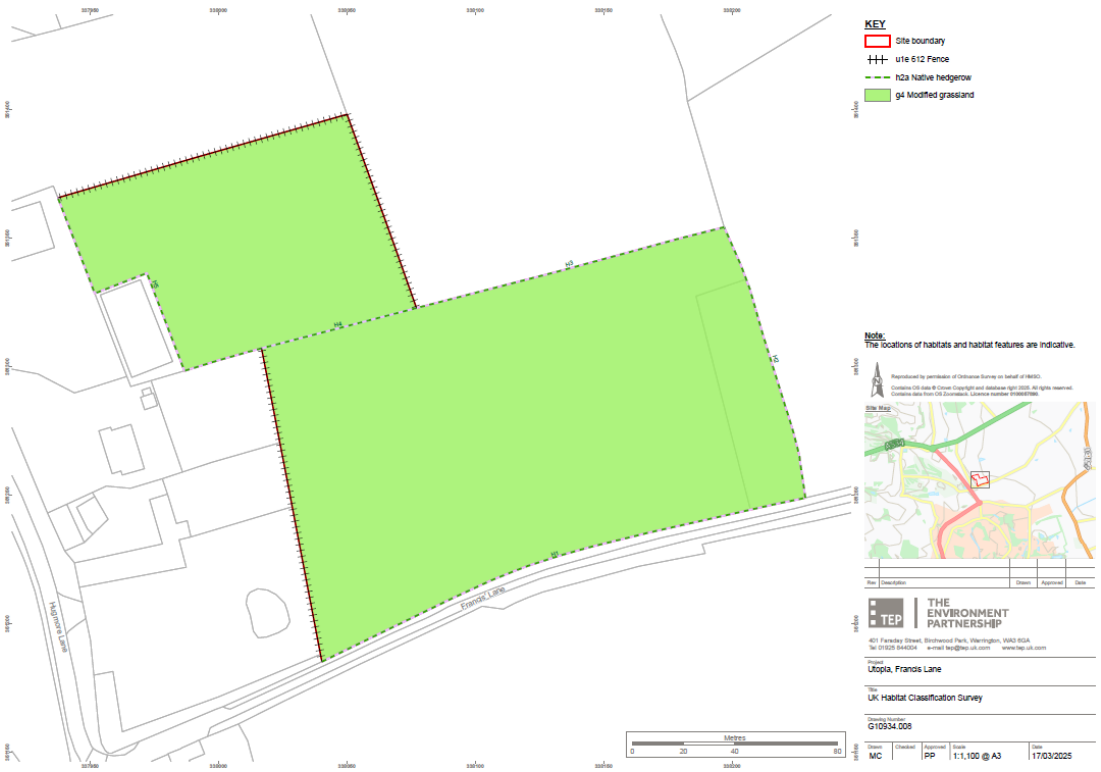


Figure 10. Phase 1 Habitat Survey Plan, Northern Ecological Mitigation Area. The Environmental Partnership 2025

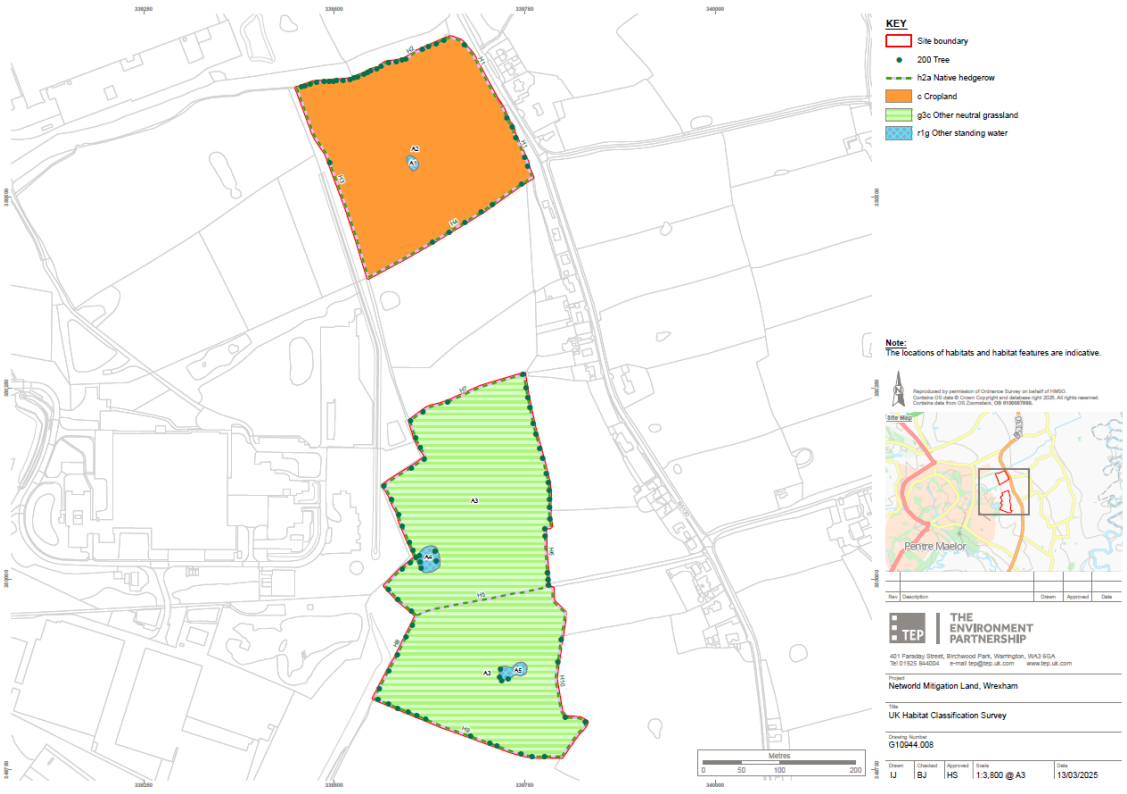


Figure 11. Phase 1 Habitat Survey Plan, Land adjoining the B5130. The Environmental Partnership, 2025.

5.39. There are existing ponds on the two sites, which contribute towards Wrexham Industrial Estate's status as home to an important population of Great Crested Newts (a protected species for whom the protection of their Favourable Conservation Status is important) is noted.

5.40. There is potential for amphibians, badgers, bats, nesting birds, reptiles, and hedgehog to be present within the two sites.

5.41. When considered as a whole, the proposed development will provide optimal terrestrial habitat for amphibians with foraging and resting opportunities and connectivity to the ponds in the wider landscape.

5.42. The proposed Strategic Ecology Corridor will occupy the two sites which are ecologically valuable, noting the dual role that the Wrexham Industrial Estate has for wildlife and provisions within WCBC's LDP for delivering a Strategic Ecology Network. The proposed development helps facilitate this policy objective.

5.43. The submitted drawings illustrate the site layout which will increase the ecology provisions on site contributing towards the existing Strategic Ecological Network which includes introducing new Wildlife Ponds which are suitable for Great Crested Newts (a net gain compared to the existing situation) alongside hibernacula across the Strategic Ecological Network.

5.44. Overall, the Proposed Development represents an improvement from an ecology perspective and will successfully mitigate offsite development proposals, as discussed in paragraphs 5.9 - 5.18 of this report.

5.45. As part of this planning application portfolio, TEP have produced two Habitat Management Plan's for the Site.

5.46. The long-term management objectives of the HMP are as follows:

- To ensure new planting establishes to create a high-quality landscaping scheme;
- To ensure that retained and newly created habitats are maintained to enhance their biodiversity and connectivity as foraging and commuting habitat for high value wildlife including amphibians;
- To safeguard and enhance the biological and physical integrity of the Site; and
- To comply with legal obligations and constraints.

5.47. The following priority species and habitats listed in the Wrexham County Borough Council (WCBC) Local Biodiversity Plans (BAP) will be sustained around or within the site:

- Ponds;
- Hedgerows; and
- Great Crested Newts.

5.48. All existing trees on the site will be retained, with additional native tree planting being undertaken within areas of thicket/scrub planting and native hedgerow planting. Tree planting is proposed in a scattered pattern within native scrub/thicket, and in native hedgerow planting along field boundaries, to provide visual screening for the Site and habitats for a range of species.

5.49. The existing hedgerows already present will remain on site, with additional hedgerow planting to provide further opportunities for wildlife.

5.50. Thirty-six ponds are to be created across the whole Strategic Ecology Corridor, which have been designed and managed to maximise benefits for a range of wildlife, with a special focus on Great Crested Newts

5.51. The HMP will be reviewed on an annual basis by Net World Sports and/or the appointed managing organisation and other key partners to ensure that the HMP is meeting the original management objectives and responding to the developing needs of the site.

5.52. The management organisation will produce an annual report, summarising the management of the Site over the last year. It is also recommended that the management organisation produces a cash-flow forecast for the next 3-5 years but that can be flexible enough to respond to changing circumstances.

5.53. More information is provided within the Ecological Impact Assessments and Habitat Management Plan produced by The Environment Partnership (TEP). The purpose of these documents is to provide a

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framework for long-term habitat and ecological management and maintenance of both the Northern and Southern ecological mitigation areas.

5.54. An appropriately qualified landscape consultant will formally re-address the HMP and annual review information on a five yearly basis to ensure the habitats and landscaping associated with the Site are maintained perpetuity.

Landscape and Visual Impact

Policy and Guidance

5.55. Environmental sustainability is a key objective of good design, as identified in PPW. This includes enhancing biodiversity.

5.56. LDP Policy SP14 and SP15 seek to protect conserve and enhance the natural environment and green infrastructure. In accordance with emerging Policy NE3, development will only be permitted where it does not cause unacceptable harm to trees, woodlands, and hedgerows. If adverse impacts cannot be avoided, adequate mitigation will be required.

5.57. Chapter 3 of PPW covers strategic and spatial choices and at 3.3, it encourages good design to make better places. It states that good design is fundamental to creating sustainable places where people want to live, work, and socialise. It further states that design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places.

5.58. Policies relating to the natural environment and landscape character are set out in Chapter 6: Distinctive and Natural Places of PPW. The chapter states that a resilient Wales can be supported by protecting and providing sufficient scale, extent, diversity, and connectivity within, and between, landscapes and habitats to maintain and enhance biodiversity and the resilience of eco systems.

Compliance of the Proposed Development

5.59. A Landscape Visual Impact Assessment (LVIA) is a tool used to help design the proposed change of land as well as its effects, so that negative landscape effects are avoided, reduced, or offset. The need for an LVIA will depend on the specific development and the local planning regulations. Many applications are not subject to a statutory requirement to provide an LVIA, however Planning Policy Wales (PPW) requires plans to set out spatial strategies and individual development proposals to be considered and assessed with regard to their impacts on landscape character.

5.60. No LVIA has been carried out within this development proposal as it is considered that the development proposals form natural development with no urbanisation occurring. Therefore, the landscape impacts and visual impacts will not be distinctively different to the land as it currently is.

5.61. The proposed features have been designed to be read as part of the landscape rather than having built development on the land and urbanising it. As well as this, a large proportion of the land is set back from the road, where it is not visible. The land will also not be open to the public (apart from the existing

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Public Rights of Way which run through part of the Southern Ecological Mitigation Area). Therefore, there is unlikely to be any negative impacts on surrounding development or landowners.

5.62. The Visual Impact Assessment element of the LVIA is concerned with how people will be affected by changes. The visual receptors in an LVIA will always be people not landscape features. An assessment of visual impacts will consider how people will be affected by changes in views and visual amenity. It is considered that as the development is not built form, rather it is improvements to the existing ecological features on site, no persons will be impacted in terms of negative visual amenity. It is envisioned that there will be no objections to the application based off impact on residential or visual amenity, or negative impacts to the landscape.

5.63. The parcels of land are all located within Flood Zone A and as there is no hardstanding or built form proposed through this scheme, the flooding risk will not change. There are existing drainage ditches present on site which will not pose an issue to the development proposals and vice versa as these will continue to operate as normal.

5.64. The proposed plans for the two areas of land will not have an impact on the flood risk on site, with water being able to feed the site, and drain away naturally.

Ground Conditions and Heritage

Policy and Guidance

5.65. Planning Policy Wales (PPW) 2024 outlines the national planning policy framework regarding the historic environment, further supported by Technical Advice Note 24 “The Historic Environment” (2017). Chapter 6, titled "Distinctive and Natural Places," of PPW emphasises the significance and value of the country's unique historical character.

5.66. Chapter 6 states *“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*”.

5.67. Paragraph 6.1.9 states that “*Any decisions made through the planning system must fully consider the impact on the historic environment and on the significance and heritage values of individual historic assets and their contribution to the character of place.”*

5.68. Paragraph 6.123 states *“The planning system recognises the need to conserve archaeological remains. The conservation of archaeological remains and their settings is a material consideration in determining planning applications, whether those remains are a scheduled monument or not.”*

5.69. Technical Advice Note (TAN) 24 complements the guidance outlined in the Planning Policy Wales (PPW) by focusing on the historic environment. It offers direction on how development plans and planning decisions should take into account historic assets.

5.70. UDP Policy EC11 states that development which would directly affect the non-scheduled sites of archaeological importance will only be permitted if an archaeological investigation has been carried out to determine the extent and significance of the remains.

5.71. LDP Policy 16 indicates that development will be supported if it protects, conserves, preserves, or enhances the cultural and historical assets of the county borough along with their surroundings.

Compliance of the Proposed Development

5.72. Historically and currently, both the Northern and Southern Ecological Mitigation Areas have been agricultural fields.

5.73. There are no Scheduled Ancient Monuments on site, nor will the proposals impact on any Listed Heritage Assets.

5.74. The only possible impact might be on the Grade II Listed Heritage Asset; New Holt Lodge Farm which is located near to the Francis Lane parcel. However, especially noting that proposals on this part of the site are limited to landscaping features (such as ponds) and restricted to privately owned fields it is still considered that there isn't any harm to statutory heritage assets. If a decision-maker were to consider that harm did arise on this asset, this would clearly be less than substantial harm. It is considered that delivering land for ecological purposes has public benefits which would outweigh any harm arising. This is both in terms of enabling the delivering of employment generating uses in other applications and, more directly, through creating an improved natural environment with substantial biodiversity benefits. These ultimately benefit the public.

5.75. The Applicant's Environmental Consultant, Tier have reviewed the two areas of land to understand their history. The conclusions for the Northern Ecological Mitigation Area include the following:

- The land is predominantly agricultural with both grassed and cropped fields, with a residential / farm property (Holt Lodge Farm) located in the western extent of the site. The agricultural fields are delineated by trees and hedgerows;
- The site has remained largely undeveloped since earliest records with 2 No. pond features in the southeast and northwest, both potentially infilled circa 1960;
- The site is underlain by Kinnerton Sandstone Formation, a Principal Aquifer, and superficial deposits of Devensian Till, a secondary Undifferentiated Aquifer;
- There are no landfills located within 250m of the site;
- The site falls within a Phosphorus Sensitive SAC Freshwater catchment area associated with the River Dee; and
- The site is not located within an ecologically sensitive area.

5.76. Tier came to the following conclusions in regard to the Southern Ecological Mitigation Area:

- The parcels of land are currently within an agricultural use, with the surrounding land uses including a combination of agricultural, industrial, and residential developments;
- The land has been within an agricultural use since at least 1872, with ponds and footpaths shown on historical maps;

- The surrounding area has seen significant industrial development since the 1940's, developing into the Wrexham Industrial Estate by the 1990's;
- The site is underlain by superficial deposits classified as a Secondary Undifferentiated Aquifer. The bedrock is classified as a principal Aquifer (Kinnerton Sandstone);
- The site falls within a Phosphorus Sensitive SAC Freshwater catchment area associated with the River Dee; and
- The site is not located within an ecologically sensitive area.

Flood Risk and Drainage

Policy and Guidance

5.77. Paragraph 6.6.25 of the PPW states that development should reduce and must not increase flood risk. LDP Policy SP19, Climate Change, states that to mitigate the impacts of climate change, development proposals will need to demonstrate that they avoid areas susceptible to flood risk in the first instance, in accordance with the sequential approach set out in national guidance. Development which would increase flood risk will be prevented. The potential effects of climate change should be assessed when preparing a Flood Consequence Assessment for development sites.

5.78. UDP Policy EC13 is clear that development which could result in unacceptable adverse impacts on the water environment due to additional surface water run-off will not be permitted.

5.79. LDP Policy DM1 (Development Management Considerations) states that development proposals must not increase the risk of flooding but make adequate provisions for sustainably dealing with foul and surface water drainage and not result in an unacceptable impact on the water environment.

5.80. LDP Policy NE6 (Wastewater Treatment and River Quality) provides advise on development within the protection area of the River Dee and Lake Bala SAC. The policy states that development will only be permitted where there is no adverse effect in the integrity of the River Dee and Bala Lake SAC, in particular through the treatment of wastewater.

5.81. Welsh Government Technical Advice Note (TAN) (Development, Flooding and Coastal Erosion) provides technical guidance that supplements the policies set out in PPW in relation to flooding and coastal erosion. It provides a framework within which the flood risks arising from rivers, the sea and surface water, and the risk of coastal erosion can be assessed. The TAN was last updated on the 31st of March 2025, to reflect the growing importance of regeneration but also the increased concern over flood risk. The TAN seeks to ensure that the likelihood of flooding and the impacts it would have been appropriately considered in all relevant planning decisions, with the fundamental principal of the TAN being to restrict new development in Zone 3, and to ensure that decision makers have taken flood risk matters into consideration in all other zones.

Compliance of the Proposed Development

5.82. The Flood Map for planning has identified the site as located within Flood Zone A), indicating that the site is low risk (less than 1 in 1000 years or 0.1% annual probability of flooding in any given year), from fluvial sources from both coastal and riverine flooding.

5.83. Certain parts of both the northern and southern ecological mitigation areas have areas of low to high risk for surface water flooding. In the areas at low risk, each year there is a chance of flooding between 1 in 1000 and 1 in 100. Medium risk areas have a yearly chance of flooding between 1 in 100 and 1 in 30 and areas at a high risk of flooding have a yearly chance greater than 1 in 30. As there is no built development occurring on site, this shouldn't be a concern.

5.84. Based on the guidance set out in TAN15, the site is predominantly located within Flood Zone 1 for flooding risk from Rivers, however there are isolated areas of Flood Zones 2 and 3 for surface water flooding across both the Northern Ecological Mitigation Area and the Southern Ecological Mitigation Area.

5.85. The Site is located in a Fluvial Flood Risk Zone A, indicating a low risk of flooding from fluvial sources. Consequently, the justification test is not required. Based on both local and national policy there is no further need to assess flood risk.

5.86. The proposals will create no negative impacts on the River Dee and the Bala Lake SAC. As well as this, the proposals will not lead to an increase in foul drainage requirements. All drainage will occur naturally, as only vegetation will be present on site.

Impact on Residential Amenity

Policy and Guidance

5.87. LDP Policy EM6 (Pentre Maelor and KSS3 Housing Buffer Zones) of the Wrexham Local Development Plan states that the residential dwelling adjacent KSS3, Land north of Bryn Lane, are safeguarded as buffer zones remaining free of built development to ensure satisfactory standards of residential amenity. It is considered appropriate that a buffer is retained between areas of development and the residential properties.

5.88. LDP Policy DM1 (Development Management Considerations) states development should not have an unacceptable effect on the amenity of the occupiers of nearby properties/land; and provide a satisfactory standard of amenity for the occupiers/ users of the development itself.

5.89. Paragraph 5.4.15 of PPW states regard should be given to the proximity and compatibility of proposed dwellings to existing industrial and commercial uses to ensure that both residential amenity and economic development opportunities are not unduly compromised.

5.90. UDP Policy GDP1 (New development) states that new development should ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.

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5.91. UDP Policy CLF7 (Informal recreation) informs that development of countryside and water resources for informal recreation will be permitted provided that it does not harm visual amenity or nature conservation interests.

Compliance of the Proposed Development

5.92. The sites are set back from the road, with no built development being proposed. Therefore, the impact on any nearby residential dwellings should not be negative.

5.93. While the land will be predominantly left as open fields, the parcels will not be made open for the public to walk/cycle through aside from the existing PROW within the Southern Ecological Mitigation Area. Instead, the land will be left to regenerate with as little human interaction as possible.

5.94. The proposals include planting new trees, creating new ponds and three bunds (themselves still ecological features including their own planting and trees). The ponds will be low lying development, with the trees not threatening anyone's residential amenity. The presence of the increase tree planting and the new bunds will act as a barrier between the surrounding residential dwellings and Wrexham Industrial Estate.

5.95. The safety of the public has been taken into account, however as the parcels of land are not for public use (other than to use any existing PRoW's) no one from the public should be on the land. The proposals are to enhance the existing ecological features on site, so if a member of the public did go onto the site, there will be no safety issues faced.

5.96. The proposed development will not impact on visual amenity for surrounding residents, potentially improving screening of views of the Wrexham Industrial Estate from properties near the Southern Ecological Corridor.

5.97. It is recognised that there are nearby houses and community facilities to the proposed development which may experience some disruption during the construction phase, including some need for vehicles to access the site for this purpose. However, it is necessary to achieve overarching scheme benefits, with the disruption being temporary.

5.98. As well as this, the proposals will be delivered in a phased approach, meaning there may be breaks in the development and construction process. Whilst there may be disruption to neighbouring landowners and residential dwellings during the construction period, the phasing approach should mean there will be less intense disruption compared to if the development was completed in one go.

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6. SUMMARY CONCLUSIONS

6.1. This Statement has been prepared on behalf of Mauna Kea Limited to support a planning application for a change of use from agricultural to ecological, alongside landscaping, access, and associated works.

6.2. The Site is located on the outskirts of Wrexham Industrial Estate which is a designated employment site within Wrexham and an area which the Council wishes to direct employment growth, with ecological provisions present on site through its Local Development Plan. The Proposed Development is supportive of this objective.

6.3. The Proposed Development will increase species diversity, create a range of linked habitats, and provide an uplift in ecological attributes such as pollinator species, breeding sites and wildlife foraging potential. The scheme has been designed to mitigate planning applications P/2023/0497 and P/2025/0143 which have been put forward in line with local policy to extend the Wrexham Industrial Estate. It will also support future development proposals at the Applicant's Headquarters Building. The landscape led strategy retains and enhances existing features on site, including the creation of new ponds which will support the wider ecological objectives on the Wrexham Industrial Estate.

6.4. The proposal is accompanied by a range of plans and technical reports to set out the proposals and address technical planning matters where relevant. The supporting information demonstrates that the proposed development is acceptable when measured against national and regional planning policies and guidance in the context of relevant material planning considerations.

6.5. This statement and the accompanying supporting information are considered to show that there are no material considerations that would be adversely affected by the proposed development.

6.6. As such, we consider that the proposal is acceptable when measured against relevant local, regional, and national planning policies, and there are no material planning considerations that would support the refusal of the application. Therefore, we consider that the application can be supported, and we respectfully request that planning permission be granted.

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Appendix A



1 = Utopia City / Land North of Bryn Lane, 2 = Land South of Byrn Lane, 3 = Net World Headquarters

4 = Northern Ecological Mitigation Area, 5 = Southern Ecological Mitigation Area

Carter Jonas