



PLANNING ADDENDUM

Dragon Packaging

Planning application: P/2022/1052

FI009-04v1

NOVEMBER 2024

This Addendum is provided to reflect on both the scheme amendments since submission of the application in 2022 and to cover updated planning policy in the Local Development Plan adopted in December 2023.

1 PROPOSALS

- 1.1 Planning application P/2022/1052 is made for “*Extension to Existing Warehouse, Alterations to Service Yard and New Access*” at the existing Dragon Packaging Ltd, Unit 47 and 48 Clywedog Road South, Wrexham Industrial Estate.
- 1.2 The broad nature and characteristics of the proposals are unchanged since submission. This remains a detailed application for approval of two warehouse extensions to either side of the existing unit to facilitate the operations of Dragon Packaging Ltd. The scale and design of the extensions are unchanged.
- 1.3 The amendments relate to the external areas from the originally submitted Proposed Site Plan, Revision E, to the present, Revision H. Those amendments are:
 - Reconfigure the car parking to the western side to reduce the extent of hardstanding into the existing landscape area in the site frontage (northside), handing the parking bays to the eastern side. This made in response to comments from Council ecologist.
 - Remove the footway returns from the new egress onto Clywedog Road South and position the pedestrian crossing point in line with the existing pavement alignment (i.e. not further into the bell mouth). This was made in response to comments from Council highway officer.
 - Revision to the landscape scheme, made both in response to officer comments and to coordinate with the following amendments.
 - Revision to the surface water drainage scheme to reflect that Welsh Water has confirmed the extensions can be accommodated within the revised environmental permit to Five Fords WwTW relating to phosphates.
 - Review and amendment of ecological enhancements onsite to reflect amended landscape and drainage, and to include offsite mitigation in response to Council ecologist comments, the area of land identified being existing woodland on Bridge Road within the estate.
- 1.4 For clarity an updated submission sheet is appended to reflect amended drawings and documents since submission.
- 1.5 A legal agreement will be required to secure the offsite ecological mitigation which will be separately provided. It will follow the approach used recently elsewhere in the Estate.

2 CONSULTEE RESPONSES

Highways

- 2.1 In total three comments have been received by highway officers in March, July and November 2023. Unfortunately the last comment did not reach the applicant until recently.
- 2.2 Alongside this planning update we provide a **Technical Note 2, by Prime Transport** and updated **Sustainable Urban Drainage Strategy, by Shaw-Stephens**, to pick-up the outstanding points made by the highway officers on 22nd November 2023. The matters raised were; (1) a request for further drainage information relating to the new egress onto Clywedog Road South prior to determination; and (2) a request for further clarification on the HGV trip generation and the number of HGVs which can be accommodated on the site.
- 2.3 On matter (1) the drainage information is provided in the **Sustainable Urban Drainage Strategy, 20th September 2024, reference 0133-SCC-XX-XX-RP-C-0002-P01**, explaining the drainage strategy and at Appendix 6 is the **Schematic Drainage Strategy GA, reference 0133-0001-P01, dated Sept 24**. This illustrates the proposed surface water drainage and existing surface water drainage within the carriageway and the provision of two new gullies at the new egress that will drain back into the site and through the SUDS rated interceptor and modular storage tank before its reconnection into the existing surface water drainage system.
- 2.4 On matter (2) the **Technical Note 2** clarifies the HGV trip generation point that the purpose of the first note by Prime (28 April 2023) was to confirm that in a hypothetical worst-case scenario, such as doubling the number of trips in/out of the site that this would still have a negligible impact on the highway network. In reality, and reflected in the company statement, the number of HGV trips will not double, and the extensions are proposed to improve the storage, dispatch and receiving of goods which currently has insufficient capacity and is partly undertaken in trailers in the service yard.
- 2.5 Upon re-consultation with highway officers we trust this will address the residual matters.

Ecology

- 2.6 In 2023 we submitted an Amphibian Conservation Plan (ACP) & Landscape Ecological Management Plan (LEMP), reference UES03538-02, based on an updated Preliminary Ecological Appraisal (PEA), reference UES03538-03, all prepared by UES.
- 2.7 In November 2023, your ecologist Emma Broad confirmed her agreement to the evidence and approach in the ACP and that a suitable planning condition could deal with the mitigation measures. At the same time it was also expressed that the scale of development to the plot was in her opinion too great to satisfactorily mitigate the ecological impacts on site and sought consideration of additional offsite mitigation measures.

- 2.8 As part of the submission update, we are issuing an updated **ACP & LEMP, reference UES03538-02 version 2**. This reflects the alterations in the layout and landscaping following changes to the drainage and the more recent, minor change to the egress pavement returns.
- 2.9 Offsite ecological mitigation will be provided through enhancement and management of woodland at Bridge Road within the estate, also in the control of FIREM. The area of search is shown on **drawing 1182-02-009 P01**. It is intended this mitigation area will also serve the development at Bridgeway Centre, though that application (P/2022/0065) may establish that onsite mitigation is sufficient following scheme revision. This is for parallel discussion with Emma Broad.
- [Note: Previously we had considered land immediately to the north across Erlass Lane, also in FIREM control, but this land already has been allotted as ecological improvement land in connection with earlier developments on the Estate.]
- 2.10 The offsite mitigation will be subject to a separate management regime in a Habitat Management and Monitoring Plan (HMMP), which shall be prepared by UES. We have purposefully separated this from the site based LEMP to prevent confusion and simplify conditions referencing measures to control on site and measures in a legal agreement to control the offsite measures.

The HMMP will be issued once the mitigation area is established referred to above as part of consultation with Emma Broad. To inform this consultation we are submitting the update Preliminary Ecological Appraisal, version 2, UES03012/17, which covers the mitigation area as well as the application site at Bridgeway Centre. This is to ensure the baseline data on the ecological value of the offsite woodland area is available in this application to reference.

Trees / Landscaping

- 2.11 In May 2023 the landscape proposals were revised following comments from the tree officer, and also reflecting the handing of the car parking from the western to eastern side of the service yard (compare Rev E and Rev H layouts). Without seeking to repeat matters above the change in phosphates advice from Welsh Water in September 2023 meant that the need for rainwater / swales around the perimeter was removed, leading to changes in the landscape scheme which now reflects proposed layout Revision.
- 2.12 The landscape scheme for approval is now set out through **MDLandscape drawings 224-L-100-P01 Landscape and Biodiversity Proposals Plan and 224-L-400-P01 Schedule Specification and Implementation Plan**.

Green Infrastructure Statement (GIS)

- 2.13 Following changes in legislation since the original application a **Green Infrastructure Statement (GIS)**, reference UES03538/06, prepared by UES is now submitted. Without repeating matters set out about and what is said within the GIS, it essentially shows that the design iteration and outcome now reached,

informed by consultee comments, has followed the 'step-wise approach' for ecology, landscape and drainage considerations.

Legal agreement

- 2.14 As set out under the ecology subheading, FIREM and the Council will need to enter into a legal agreement to provide offsite ecology mitigation as part of demonstrating a net biodiversity gain. The format is intended to follow prior agreements at Site 5 and Kingmoor to commit FIREM to a 30-year management of the identified ecology mitigation area to be overseen by the North Wales Wildlife Trust (NWWT) through its existing co-operative agreement. The approach should now be familiar to officers. Given timescales and the need to submit the updates this will follow-on.

3 POLICY UPDATE

- 3.1 In December 2023 the Local Development Plan (LDP) was adopted by the Council. We did consider then emerging policy in the original Planning Statement in 2022, but we now extract and update that policy review.



Extract LDP Proposals Map, 2023

Site is subject to Policies SP2, SP8, SP9, EM1, MW6 and EM2 as an Employment Area

Policy SP9 Wrexham Industrial Estate Strategic Ecological Network applies to north/northwest edge of the site (green line)

- 3.2 The following policies are considered relevant to the proposals:

- SP2 Location of new development
- SP5 Planning obligations
- SP8 Economic growth employment and enterprise
- SP9 Wrexham Industrial Estate
- SP11 Transport and accessibility
- SP12 Design principles
- SP14 Natural environment
- DM1 Development management considerations
- NE3 Trees woodlands and hedgerows
- NE6 Waste Water Treatment and River Water Quality
- EM1 Protection of Existing Employment Land
- T1 Managing transport impacts

Principle of development

- 3.3 The existing units and business falls within Class B2/B8 use as a mixed manufacturing and warehouse / distribution business. The site is previously-developed land and is located within the defined employment area of Wrexham Industrial Estate. This proposal for construction of two extensions, new egress and amended yard and parking will support the continued operation of the business and investment into its future. This is directly supported by policies SP2 (location of development), SP8 (economic growth), SP9 (Wrexham Industrial Estate) and EM1 (protecting employment land).

Siting, scale, appearance and layout

- 3.4 The 2022 Planning Statement and Design & Access Statements set out the rationale for the design and layout which is driven by the existing layout, access and site constraints and opportunities; and the operational needs of Dragon Packaging. The scheme will form an appropriate, simple industrial building and premises fit for purpose for the occupier to invest in its operations at the site, safeguarding jobs and opportunities. The design follows the form and scale of the existing industrial units, an expected and appropriate design approach in the industrial estate. The service yard area and parking has been amended in Layout Rev H to reflect comments of the Tree Officer to remove impact on the existing landscape to north / northwest which aligns with the policy objective of the WIE Strategic Ecological Network (SP9). Overall the proposals align with the design principles set out in Policy SP12.

Access and transport

- 3.5 The Transport Statement and subsequent Technical Notes in response to consultee comments confirm that the proposals will not lead to any unacceptable harm to the local highway network through HGV trip

generation, will create a safe and operable new egress onto Clywedog Road South and will confirm to parking and cycle parking standards for B8 warehouse use – which is the purpose to which the extensions are to be put. Technical Note 2, prepared by Prime, and the updated SUDS details to confirm the drainage for the new egress are to be reviewed by Wrexham Highway Officers. On assumption the update is agreed to address the clarifications sought then we can conclude that the proposals will accord with the objectives of Policies SP11 and T1.

Drainage

- 3.6 The drainage information has been updated to reflect the revised Layout Rev H and previous consultee comments, including the change in stance by Welsh Water in September 2023 to confirm that phosphates will no longer be a determining factor in connection with this application with its updated licence for Five Fords WwTW. Subject to confirmation on consultation of the update documents prepared by Shaw-Stephen, we can conclude that the proposals will be in accordance with national policy TAB15 (flood risk), DM1 (drainage) and NE6 (waste water treatment).

Landscape and ecology

- 3.7 The landscape and ecological mitigation approach has been revised since submission and will be subject to re-consultation. In terms of tree loss this has been minimised in the revision to trees within groups G2 and G5 shown on plan 224-T-200 Tree Retention and Removal Plan. The trees are mix of crack willow (G2 & G5) and silver birch, whitebeam and apple (G5), all are of a lower C2 category, and all are required for removal to facilitate the building of the extension and car park alteration.
- 3.8 The Landscape and Biodiversity Proposals Plan, reference 224/L/100 and also appended to the LEMP with additional notes, sets out a range of proposed wildflower grass seeding, hedgerows, native tree and scrub planting alongside wildflower scrubs and the retained trees and scrub mainly to the northwest of the site.
- 3.9 The LEMP is combined with an Amphibian Conservation Plan (ACP) to safeguard species during construction and operation of the development, though it is recognised the present nature of the site and operation does not lend itself to a site suitable to support Great Crested Newts. Reasonable Avoidance Measures (RAMs) are proposed and can be conditioned.
- 3.10 On the basis of acceptance of the amendments, the proposals will maintain the existing trees and landscapes contained within the identified WIE Strategic Ecological Network (SP9).
- 3.11 As set out in section 2, offsite mitigation for ecology has been requested by the Council's ecologist and we propose to do this on woodland identified at Bridge Road shown on drawing 1182-02-009 P01. The precise area required for mitigation may be less than that shown and will be subject to ongoing discussion with the Council's ecologist which will then be captured through the proposed legal agreement and Habitat Management and Monitoring Plan (HMMP).

- 3.12 The combination of the revised landscape and ecology approach will support the principles set out in Policies SP5, SP9, SP14 and NE3.

4 CONCLUSION

- 4.1 The revision to the application maintains a sustainable development that balances the economic needs of Dragon Packaging to invest and grow its business at Wrexham Industrial Estate, safeguarding and providing opportunities for local employment. It will provide an appropriate expanded premises, service yard and parking within a wider landscape setting that is a feature of the industrial estate. Moreover, it balances the landscape and ecological imperatives to enhance biodiversity and will provide a long-term managed habitat in line with estate wide objectives of the Strategic Ecological Network. Matters of drainage, highway access and traffic generation are acceptable managed.
- 4.2 As c concluded in 2022, this will be a sustainable development that will support economic and social objectives to support the local economy and community and will not lead to adverse impacts to matters of environmental concern.

Submission Pack Update

The application in November 2024 comprises the following drawings and documents (some new as highlighted red):

Drawings:

- 1121-02-001 Rev P3 Site Location Plan
- **1121-02-002 Rev H Proposed Site Plan**
- 1211-02-003 Rev P2 Existing Site Plan
- 1211-03-001 Rev P2 Existing Floor Plan
- 1211-03-002 Rev P1 Proposed Floor Plans
- 1211-05-000 Rev P1 Existing Elevations
- 1211-05-001 Rev P1 Proposed Elevations
- 197/T/300 AIA Tree Constraints Plan, dated 11/2/22
- **224/L/100 Rev P01 AIA – Landscape and Biodiversity Proposals Plan, dated 6/11/24**
- 224/T/200 Rev P01 – AIA – Tree Retention, Pruning and Removal Plan, dated 2/5/23
- 224/T/300 Rev P02 – AMS – Tree Protection Plan, dated 2/5/23
- **224/L/400 Rev P01 AIA – Schedule, Specification and Implementation Plan, dated 6/11/2024**
- P22015-001C Proposed Access Strategy
- P2015-002 Swept Path Analysis

Documents:

- Design & Access Statement, McAU, August 2022, 1211-InD-001
- AIA Method Statement Report, MDLandscape, August 2022, 224/R/200
- **Amphibian Conservation Plan (ACP) & Landscape Ecological Management Plan (LEMP), UES, 7th November 2024, UES03538/02 Version 02**
- Company Statement, Dragon Packaging, issued 30th August 2023
- **Flood Consequence Assessment, Shaw-Stephens, 20th September 2024, reference 0133-SSC-XX-XX-RP-C-0002-P01**
- **Green Infrastructure Statement, UES, reference UES03538/06**
- PAC Report, Plan Red, November 2022, FI009-03v1
- **Phase 1 Site Investigation Report, Shaw-Stephens, September 2024, reference 0133-01**
- Planning Statement, Plan Red, November 2022, FI009-01v3

- Planning Addendum, Plan Red, November 2023, FI009-04v1
- Preliminary Ecological Appraisal, UES, 14th April 2023, UES03537/03
- Waste Management Plan, Plan Red, November 2022, FI009-02v2
- Transport Statement, Prime, P22015
- Transport: Response to WCBC Comments, Prime, 28th April 2023, P22015 (“Technical Note 1”)
- Transport: Technical Note 2 – Response to WCBC Comments, Prime, 30th October 2024, P22015
- SuDS Strategy, Shaw-Stephens, 20th September 2024, reference 0133-SCC-XX-XX-RP-C-0002-P01
 - Includes as Appendix 6 Schematic Drainage Strategy GA, reference 0133-0001-P01, dated Sept 24

Details relating to the offsite ecology mitigation – for discussion at present:

- 1182-02-009-P01 – Existing Site Layout, Bridgeway, dated 23/9/24
- Preliminary Ecological Appraisal (version 2), UES, 8th November 2024, UES03012/17

Matters to follow as part of ongoing ecology discussion:

- Habitat Management and Monitoring Plan, UES
- Section 106 Agreement – heads of terms, Gateleys LLP