



PLANNING ADDENDUM

Bridgeway Centre, Wrexham Industrial Estate

Planning application: P/2022/0065

FI003-008v1

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/2022/0065 is registered currently as; *“Hybrid application - (a) full permission to demolish existing units and erect 33 units for B1/B2/B8 use, (b) outline permission for 19 industrial (B1/B2/B8 use) with associated access, landscaping and associated works.”*
- 1.2 The changes to the Part (a) detailed and Part (b) outline elements will require an amendment to the description to read:

“Hybrid application - (a) full permission to ~~demolish existing units and erect 31~~ 33 units for B1/B2/B8 use, (b) outline permission for ~~up to 13~~ 19 industrial (B1/B2/B8 use) with associated access, landscaping and associated works.”
- 1.3 The changes are reflected in updated **Proposed Site Plan, reference 1182-02-002 Rev P23, dated 22nd November 2024**. We propose the insertion of “up to” on the outline to reflect an ability to have some flexibility to potentially merge units within a block or reconfigure the developed area which might result in a lower total.
- 1.4 We have also removed reference to demolition in the full permission as this has now been achieved in the interim through prior approval decisions and existing buildings are now demolished on site.
- 1.5 Turning to the layout amendments the proposals reflect consultation responses and discussions over a period of time and a period of reflection by FIREM on the scheme delivery into the market. Those changes are:
 - Part (a) remains a series of small units with the parking, access and layout reconfigured to reflect highway officer comments, and also to update the drainage and landscape within and around the phase. The combined total of units is now 31 (-2 units); floorspace is now 3,355 sqm (-56 sqm); and parking spaces 53 (-32).
 - Part (b) outline has seen an expansion of the landscape / undeveloped area around the southeast and southwest boundaries, including incorporation of tree root protection areas to the better specimen trees on site. The combined total of maximum units is now up to 13 (-6 units potentially); maximum floorspace is now 4,410 sqm (-2,486 sqm); and maximum parking spaces 113 (+7).
 - The number of units in Part (a) has reduced by two in loosening the density of the layout to allow improved pedestrian access, parking ratio and allow landscape planting through the scheme in response to previous comments.

- Although Part (b) is in outline a similar process has been undertaken here, particularly to reflect the larger land take for landscape. At reserved matters stage there will be refinement of the design, but this will be required to work with the revised landscape and biodiversity proposals, with only moderate ability to refine interface boundaries to maintain consistency to the outline and agreed onsite landscape / ecological enhancements, which leads to ...
- Review and amendment of ecological enhancements onsite to reflect amended landscape and drainage in both Parts (a) and (b), and to include offsite mitigation in response to Council ecologist comments in the area of land identified being existing woodland across Bridge Road.

- 1.6 For clarity an updated submission sheet is appended to reflect amended drawings and documents since submission.
- 1.7 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

Ecology

- 2.1 In April 2024 Emma Broad confirmed to our ecologists, UES, that in her opinion there was a likelihood offsite as well as onsite mitigation would be required, though this was dependent on intentions of the retention of some of the trees within and along site boundaries.
- 2.2 The revised MD Landscape, **Landscape and Biodiversity Proposals Plan, 197/LAND/L/100 revision P04**, dated 25th November, sets out the changes in the scheme for re-consultation with Emma. It shows the retention of a number of the existing trees to the southwest corner of the site, new specimen tree and hedgerow planting, rain garden, amenity short grass mix areas, proposed swales and native wildflower mix areas.
- 2.3 These proposals are for approval in detail in Part (a) as part of the hybrid permission. In Part (b) we are also seeking approval to reference as part of parameters to inform a future reserved matters application for which landscape will be a reserved matter. It will be a requirement to bring any development in Part (b) in conformity which we consider means with limited deviation, and where deviation is proposed it is results in a comparable outcome in terms of habitat retention / formation, as well as its landscape value.
- 2.4 The above plan is part of a number of updated drawings set out at the end of this document as part of the amendments, and also a **Landscape Maintenance and Management Plan, 197/LAND/L/500 revision P04** and the **Landscape Environmental Management Plan (LEMP V2)**, UES03012/17, dated 27th November 2024. Both documents will also be for approval under Part (a) and to inform parameters for Part (b). But given the specific management and maintenance plans it will give further certainty to the

local planning authority that under any reserved matters submission there can only be limited deviation from what is being presented now for approval on the landscape and habitat areas within Part (b).

- 2.5 The updated LEMP is also presented alongside an update **Preliminary Ecological Appraisal (PEA) Updated (v2)**, UES03012/17, dated 8th November 2024 and **Green Infrastructure Statement**, UES03012/16, dated 19th November 2024, (see sub-section below also). The PEA includes in section 1.2 cross-reference to prior ecological surveys, including those for bat presence / absence which have been consulted upon as part of the prior approval for demolition applications. Given the buildings are now demolished we do not consider it necessary to append these documents to this application, but the reports as listed can be reissued on request.
- 2.6 In addition to the council there were previously NRW comments in October 2022 that agreed in principle that the site was at a lower risk for presence of great crested newts, but any approval should include reasonable avoidance measures (RAMs) that can be controlled under condition. The LEMP, section 4.2.1, specifically addresses the RAMs approach for construction and operational stages and we suggest that a condition can be applied to approve the details of the LEMP to be followed, rather than require the matter to be resubmitted and approved a second time around. This is caveat to NRW and Emma Broad approval of the LEMP as set out.
- 2.7 The offsite mitigation will be subject to a separate management regime in a Habitat Management and Monitoring Plan, reference UES03012/21 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 agreed. As part of the consultation now with the Council we are providing the PEA relating to the woodland to establish the baseline, this detail is included within PEA (V2), UES03012/17.
- 2.8 We consider the breadth of information submitted and updated has addressed the past comments from Emma Broad and reflect the discussions with Tom Kenwright, UES.

Tree officer

- 2.9 Though there is significant overlap on the ecology comments, we can confirm our view that the amendments should also address the original objection by Jon Berwin, tree officer, made in May 2022 in the loss of existing trees, limitation in proposed tree / hedgerow planting and potential to cause localised heat island effect. The revised layout and landscape proposals will now retain nearly all existing trees, and will be supplemented by a considerably greater number of new trees and hedgerows alongside other landscape and habitat features as referred to above.

Highways

- 2.10 Original Highway Officer comments from May 2022 were broadly supportive of the original scheme in matters of wider traffic impact, road safety, junction access, sustainable transport and travel plan. There

was a request for a condition for a Construction Management Plan. The two areas of concern at that time were to internal layout issues for Blocks C, Block E and Block F, largely relating to turning and access and an overall concern on the amount of car parking within the scheme exceeding the LPG16 standard by 27 spaces.

- 2.11 The revised layout incorporates fewer units and fewer parking spaces. Overall the combined difference is 27 fewer spaces (201 spaces versus 228 spaces previously), but on a different balance of floorspace as set out in **Proposed Site Plan 1182-02-002 revision P23**. Parking provision includes a combined 22 accessible spaces and 6 EV charging spaces. The change therefore has addressed the comment on parking provision.

[Note: The parking figures include a revision to the existing parking to front of Block B, the existing retail units, even though the units are not proposed for any change under Part A.]

- 2.12 Internal access has been revised to create a through route between the Coed Aben Road access and Bridge Road access where previously Blocks C to E had been served solely via Coed Aben Road. The Coed Aben Road would no permit HGV access which will only be taken via Bridge Road. The change to internal circulation also includes separated pedestrian footways. Part (b) layout remains in outline internally for future reserved matters but will be required to align with the Bridge Road access and the two existing accesses maintained to the land centrally to the rear.
- 2.13 We consider the amendments in combination should address the outstanding concerns of highway officers and there is an appended **Highways Note 1, prepared by Prime**, in connection with the comments made above.

Green Infrastructure Statement (GIS)

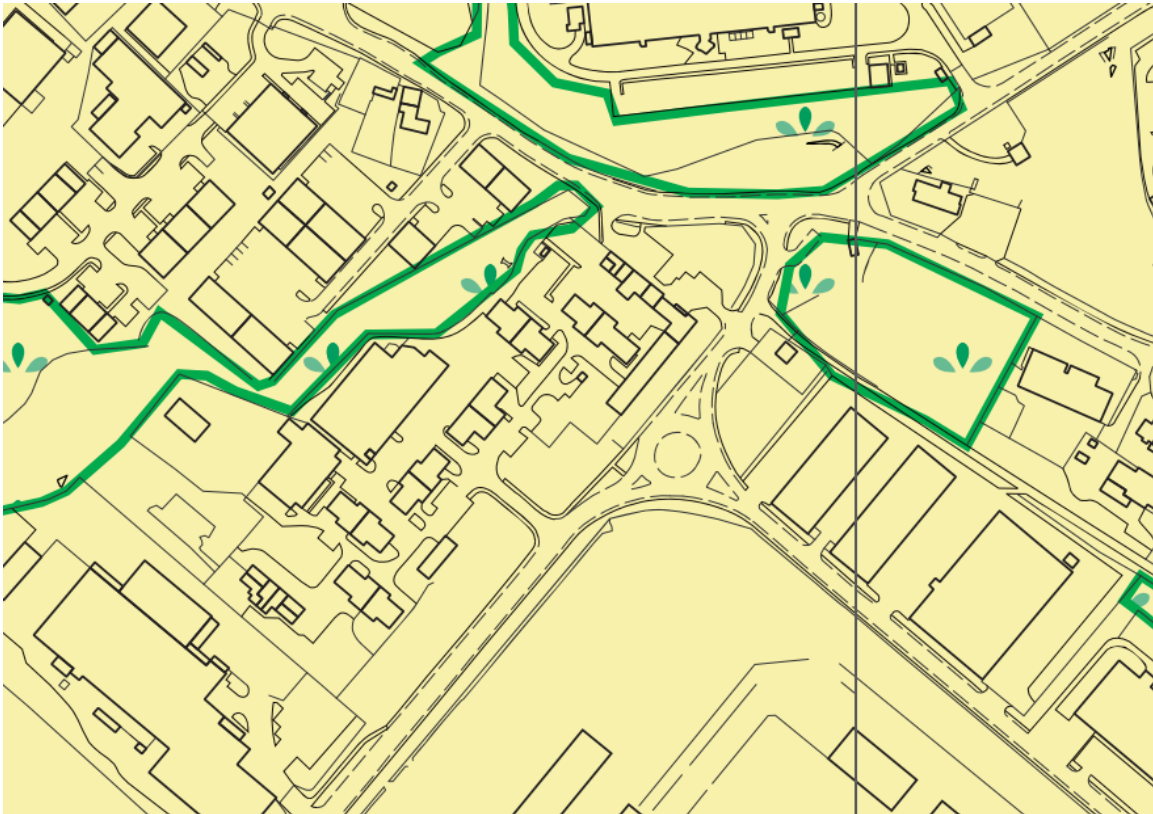
- 2.14 Following changes in legislation since the original application a Green Infrastructure Statement (GIS), reference UES03012/16, prepared by UES is now submitted. Without repeating matters set out above and what is said within the GIS, it essentially shows that the design iteration and outcome now reached, informed by consultee comments, has followed the 'step-wise approach' for ecology, landscape and drainage considerations. The drainage details are updated too in line with the revised layout and landscape proposals, including incorporating swales and rain gardens as set out and the **Combined Drainage Layout, BCW-BML-ERD-ZZ-DR-C-0500 revision P04**, prepared by Barnsley Marshall.

Legal agreement

- 2.15 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 main site and to the woodland that is proposed for offsite ecological mitigation (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 site is previously-developed land that had previously contained a range of small units in a mix of Class B1, B2 and B8 uses which are now all demolished under separate prior approval decisions since the application was first submitted. The exception is the row of shops (Block B) which falls within the detailed Part (a) red line boundary but are not proposed for any change in use from existing retail / services.
- 3.4 As previously-developed land that is located within the defined employment area of Wrexham Industrial Estate the proposal for new commercial / industrial units aligns with Policies SP2 (location of development), SP8 (economic growth), SP9 (Wrexham Industrial Estate) and EM1 (protecting employment land).

Siting, scale, appearance and layout

- 3.5 The 2022 Planning Statement and Design & Access Statements set out the rationale for the design and layout. In most respects this is unchanged, including the concept of the detailed and outline elements, but as described in sections 1 & 2 the number of units, the combined floorspace and layout has been reduced in density, allowing a looser arrangement with more retained and proposed landscaping, fewer parking spaces and an improved quality and feel.
- 3.6 Architecturally it remains a series of individual and linked single-storey commercial units with flexibility on internal layout, for example providing offices, stores and alike. The scheme will continue to be in a form that is appropriate in its industrial estate context, but now with enhancement to its frontage to Bridge Road through greater retention and proposed landscape planting. This will lead to an improvement to the quality of the units, site and wider image of the industrial estate at a key central area.
- 3.7 An updated set of unit drawings is submitted for approval to reflect the amendment in the layout and some units. The new drawing references are provided in the appended list.
- 3.8 Service yards, parking and internal circulation have been amended in the detailed and outline (indicatively) elements to improve circulation by vehicles and pedestrians from the original layout. In the outline area in particular it is proposed to retain a significant proportion of the existing trees to southwest of the site and area around both to visually retain the green frontage long-term and improve onsite

ecological value. This responds to combined comments from the ecology and tree officers on the original scheme layout.

- 3.9 We consider the revised proposals accord with the objectives of the WIE Strategic Ecological Network (SP9) and align with the design principles set out in Policy SP12.

Access and transport

- 3.10 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 trip generation. Parking and servicing is set an appropriate level for the nature, scale and type of commercial uses the buildings will attract. Access will be retained to the existing premises (Silverlink) to the rear of the site as shown in the detailed and outline layouts. 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

- 3.11 The drainage information has been updated to reflect the revised Layout P23, including changes to the layout and 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 updated drainage layout prepared by Bradley Marshall, 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

- 3.12 The landscape and ecological mitigation approach has been revised since submission and will be subject to re-consultation. In simple terms a greater proportion of existing trees are now retained onsite, primarily located to the southwest of the site in the outline area, alongside more green area around as root protection. Whether this change when balanced against the existing extent of hard surface (and former buildings) is considered sufficient in scale as onsite mitigation, including the other features of the rainwater gardens, swale, specimen tree planting and other landscaping, is for re-consultation with Emma Broad, WBC ecologist. For now we are presenting still the addition of offsite mitigation in the form of habitat enhancement and management of the woodland area across Bridge Road.
- 3.13 In terms of tree loss this has been minimised in the revision. The detailed are had very few trees within the area compared to outline area where there are five high quality trees identified along the frontage and southwest corner, amongst some moderate and lower value groups of trees. The updated **Arboricultural Impact Assessment and Method Statement, ref 197/R/400, dated November 2024** sets out the trees for retention / loss.

- 3.14 Because of the hybrid nature of the development only detailed planting is shown in the first, detailed phase through drawing **Proposed Planting Plan, ref 197/LAND/L/200 revision P04** and the **Planting Schedule, Specification and Implementation Plan, ref 197/LAND/L/400, revision P04**. This details provision of a number of specimen trees around the internal road, attenuation pond and street frontage, alongside native hedge planting and ornamental shrubs, and rain gardens.
- 3.15 The **Landscape and Biodiversity Proposals Plan, ref. 197/LAND/L/100, revision P04** and the **Landscape & Ecological Management Plan (LEMP v2), UES03012/17**, align with the proposed planting and selection of native species and specimens. This drawing and document is more expansive to take in the second phase on the outline area of the hybrid application. It is intended that this will be approved and form an effective parameter to any future reserved matters application; i.e. the built extent / hardstanding must fit around the identified retained and proposed planting, including the retained trees identified. This will be secured both through conditions relating to the submission and form of any reserved matters application and approval of the documents and management plan.
- 3.16 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).
- 3.17 Offsite mitigation for ecology has been previously discussed and, subject to further comment by Emma Broad, it is proposed to provide this through the 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 a Habitat Management and Monitoring Plan (HMMP) specifically for that area.
- [Note: The HMMP will be the same as a LEMP but by using a different title it will prevent confusion between onsite and offsite requirements, particularly when cross-referencing and setting out the decision notice and legal agreement.]
- 3.18 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 we consider reflects on past officer comments and is an improvement to the scheme to deliver a mix of modern, commercial units to attract inward investment into Wrexham Industrial Estate. It will help support and increase local job creation for new firms and those seeking to expand their operations. The revision better balances the landscape and ecological imperatives to enhance biodiversity within the wider Estate 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 (new as highlighted red and strikethrough those proposed for deletion and not replaced)

Drawings:

- 1182-02-001 Rev P05 Site Location Plan
- 1182-02-002 Rev P23 Proposed Site Plan
- ~~1182-02-003 Demolition Plan – Detailed Application Rev P01~~
- ~~1182-02-004 Demolition Plan – Outline Application Red P01~~
- 1182-05-010 - Proposed Elevations - Block J-Rev-P05
- 1182-03-003 - Proposed Plans - Block C-Rev-P03
- ~~1182-03-003A - Proposed Plans - Block C-Rev-P02~~
- 1182-03-004 - Proposed Plans - Block D-Rev-P03
- 1182-03-005 - Proposed Plans - Block E-Rev-P04
- 1182-03-006 - Proposed Plans - Block F-Rev-P06
- 1182-03-007 - Proposed Plans - Block G-Rev-P03
- 1182-03-008 - Proposed Plans - Block H-Rev-P04
- 1182-03-009 - Proposed Plans - Block I-Rev-P05
- 1182-03-010 - Proposed Plans - Block J-Rev-P04
- 1182-05-003 - Proposed Elevations - Block C-Rev-P07
- 1182-05-004 - Proposed Elevations - Block D-Rev-P06
- 1182-05-005 - Proposed Elevations - Block E-Rev-P06
- 1182-05-006 - Proposed Elevations - Block F-Rev-P08
- ~~1182-05-006A - Proposed Elevations - Block F-Rev-P06~~
- 1182-05-007 - Proposed Elevations - Block G-Rev-P05
- 1182-05-008 - Proposed Elevations - Block H-Rev-P07
- 1182-05-009 - Proposed Elevations - Block I-Rev-P04
- 1182-05-010 - Proposed Elevations - Block J-Rev-P06
- ~~1182-1101-001 Area Schedule~~
- BCW-BML-ERD-ZZ-DR-C-0500 Rev P04 Combined Drainage Layout (Barnsley Marshall)

- P20030-001 Proposed Access Strategy, (Prime)
- 197-R-100 Tree Constraints Report Bridgeway Centre
- 197_LAND_L_100_P04 Landscape and Biodiversity Proposals
- 197_LAND_L_200_P04 Proposed Planting Plan
- 197_LAND_L_400_P04 Planting Schedule Specification and Implementation Plan
- 197_LAND_L_500_P04 Landscape Maintenance and Management Plan

Documents:

- Arboricultural Impact Assessment and Method Statement, (MD Landscape), 6th November 2024, 197-R-400-P02
- Bat Scoping Survey, (UES) UES03012/02
- Bat Presence / Absence Survey, (UES) UES03012/03
- Bat Scoping Survey Update, (UES) UES03012/07 *
- Bat Method Statement, (UES) UES03012/08 *
- Bat Scoping & Bat Presence / Absence Survey, (UES) UES03012/12 *
- Bat Presence / Absence Survey, Buildings 1 & 2, (UES) UES03012/13 *
- Bat Non-Licensed Bat Method Statement, Buildings 1 & 2, (UES) UES03012/14 *
- Cover letter FI003_007
- Design & Access Statement, (MCAU), July 2022, 1182-InD-001 Rev A
- Employment Land Statement, (FIREM & Plan Red) FI003_001_v3
- Flood Risk Assessment and Drainage Statement, (Barnsley Marshall) BCW-BML-ERD-ZZ-RP-C-0500 Revision P02
- Green Infrastructure Statement, (UES), 16th November 2024, UES03012/16
- Highways Note 1, (Prime), 29th November 2024
- Historic Building Investigation, (CfAA), SA/2022/64
- Landscape & Ecological Management Plan, Updated V2, (UES), 27th November 2024, UES03012/17
- Neighbour Community Consultation Report, (Plan Red) FI003_004
- ~~Nutrient Neutrality Statement, Site 1 Bridgeway, (Delta Simons), November 2022, 88780.545245~~
- Phase 1 Preliminary Risk Assessment, (Sutcliffe) LG29073
- Planning Statement, (Plan Red) FI003_002_v5

- Planning Addendum, (Plan Red) FI003_008
- Preliminary Ecological Appraisal, (UES) UES03012/01
- Preliminary Ecological Appraisal, Updated V2, (UES) UES03012/17
- ~~Shadow Habitats Regulation Assessment, Site 1 Bridgeway, (Delta Simons), January 2023, 88780.553492~~
- Transport Assessment, (Prime) P20030/TA
- Travel Plan, (Prime) P20030/TP
- Tree Constraints Report, (MD Landscape), 10th February 2022, 197/R/100
- Waste Management Plan, (Plan Red) FI003_005 v2

NOTE: The UES bat documents marked (*) were submitted as part of the prior approval for demolition applications and are listed as they now form background documents referenced to the updated PEA and LEMP but are not “new” to the authority or necessary for determination of the application since the buildings referenced are now demolished. The documents are submitted to this application now simply to ensure a complete record.

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, Updated V2, (UES) UES03012/17

Matters to follow as part of ongoing ecology discussion:

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