



Parker Planning

POSITIVE PLANNING SOLUTIONS

Design and Access Statement (amended 05 August 2024)

Proposal: By Material Evolution Ltd for the erection of three external silos, an external weighbridge and installation of processing plant within an existing industrial building

Location: CCP Building Products Ltd, Llay Road, Llay, Wrexham LL12 0TL

1.0 General

- 1.1 The Design and Access Statement has been prepared in support of a planning application for the erection of three external silos and installation of plant including a weighbridge. The silos will be located on the west elevation and the weighbridge will be located on an area of existing hardstanding (ME.O.01 Rev A). This Statement should be read alongside the submitted plans and documents and will refer to the relevant adopted planning policies. The current adopted Development Plan is the Wrexham Local Development Plan (LDP) adopted on 20/12/23 and covers the period 2013 to 2028.

The Site

- 1.2 The site is occupied by CCP, an existing cement manufacturing plant within Llay Industrial Area defined as an Employment Area shown on the Proposals Map, Inset 4 of the adopted Local Development Plan. The site is bounded at the rear by a steep wooded embankment with trees located on this boundary and along the side boundary to the west. Only part of the CCP building is visible from the road frontage due to the set back within the site and the existing frontage building (see Figure 2 at para 5.2).

Figure 1: Site area



- 1.3 The site is accessed from Llay Road via an existing shared access and through the site of Huws Gray, an existing industrial unit that fronts the main road. The CCP facility is sited towards the rear of this part of the industrial estate. The application site comprises a manufacturing building with offices finished with materials of dark green metal sheet cladding with a brick finish to the front elevation. There is an existing silo, approximately 17 metres in height on the side elevation of the CCP building with silos of a similar height on neighbouring buildings. The site has existing parking areas, turning area for deliveries and a large external storage area.
- 1.4 The area is characterised as typically industrial in nature with a range of industrial units finished in metal sheet cladding, concrete block, some with a mix of brick and that vary in scale and size. The CCP building is located towards the rear of site against the backdrop of a steep bank where there are trees and shrubs of varying type and species. Further details of existing vegetation are provided in the Preliminary Ecological Assessment submitted with the proposal.
- 1.5 In terms of any site constraints, there are a small number of houses to the west of the site further along Llay Road (see image above). Llay Bog is located approximately 850 metres to the southwest and there are four Grade II listed buildings to the south of the site. Any impact would be minimal and is considered below in Sections 5 and 7.

2.0 Wrexham Local Development Plan 2013 – 2028

The main applicable adopted policies are set out below:

Policy SP2: Location of New Development

- 2.1 New development is directed to the defined settlement limits and employment areas as identified on the Proposals Map. This policy directs development to the most suitable locations within the County Borough in accordance with sustainable development principles set out in national planning policy. Emphasis is given to the hierarchy of the settlements within the County Borough based on the need for development plans to secure sustainable settlement patterns which meet the needs of the economy, environment and health. The settlement hierarchy identifies a framework for the location of new development based on an understanding of each settlements existing facilities / services and their capacity, infrastructure, employment opportunity, planning constraints, viability and opportunities for new development.

Policy SP8: Economic Growth Employment and Enterprise

- 2.2 Policy SP8 ensures the continued role of the County Borough as a key economic driver in North Wales and the wider region and serves to diversify the local economy and widen the economic base. The policy reflects one of the objectives of the Plan to 'support a vibrant, diverse and competitive local economy that provides a range of job opportunities to enable new and existing businesses to grow in Wrexham'. It recognises that the use of employment land should accommodate projected growth while allowing choice and flexibility to meet the varying nature of future employment needs and demands. The policy makes reference to the need to secure land and buildings to attract employment opportunities in sustainable and accessible locations.

Policy SP12: Design Principles and Masterplanning Framework

- 2.3 Development will be required to be of a high quality, sustainable design which makes a positive contribution to the creation of locally distinctive places and must demonstrate how they have taken account of the local characteristics of surrounding areas and how design will enhance the quality of the built and natural environment.

Policy SP14: Natural Environment

- 2.4 Development will only be permitted where it seeks to protect, conserve and enhance the natural environment and for this proposal includes: protected species and their habitat; natural landscape features and Green Infrastructure such as trees, hedges and woodland which contribute to the quality and diversity of the natural environment and habitats and species of importance to Wales.

Policy SP15: Historic and Cultural Environment

- 2.5 This policy states that development will only be supported where it conserves, protects, preserves or enhances the cultural and historic assets of the County Borough and their setting.

Policy SP18: Climate Change

- 2.6 This policy places carbon emissions and climate change resilience at the heart of the LDP reflecting its importance in the Wellbeing of Future Generations Act. The policy provides a framework for sustainable growth by promoting development that mitigates the causes of climate change and is able to adapt to its likely effects.

Policy SP19: Green Infrastructure

- 2.7 This policy seeks to protect, conserve and enhance natural heritage networks and states development will be required to maintain the extent, quality and connectivity of multifunctional green infrastructure on or near a site.

Policy EM1 Protection of Existing Employment Land

- 2.8 Policy EM1 states that the County Borough's existing employment areas as shown on the Proposals Map will be protected for B Use Class employment generating uses together with appropriate complementary uses and activities as referred to in Policy EM2. The purpose of this policy is to ensure that the existing employment areas within the County Borough are protected from non-employment related land uses. The policy responds to the Spatial Strategy of the Plan to ensure a range and choice of employment land and premises are available across the County Borough to assist economic competitiveness, encourage entrepreneurship, promote the growth of indigenous businesses of all types and size and attract inward investment.

Policy DM1 - Development Management Considerations

2.9 Policy DM1 states that all development proposals, where relevant, must:

- a) Accord with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/ townscape in terms of its siting, layout, scale, height, design, density, use of materials and landscaping;
- b) Not have an unacceptable effect on the amenity of the occupiers of nearby properties/land by virtue of noise, disturbance and overlooking; and provides a satisfactory standard of amenity for the occupiers/users of the development itself;
- c) Safeguard the environment from the adverse effects of pollution of water, land, light or air, or land instability, arising from development;
- d) Take account of personal and community safety and security in its design and layout
- e) Be safely and conveniently accessible for all potential users/occupiers of the development on foot, bicycle, by public transport and by car;
- f) Not give rise to parking or highway safety problems on site or in the locality;
- g) Maximise sustainable travel choices first and then provides for car related needs;
- h) Contribute to low carbon communities through energy efficiency, be designed to minimise the use of non-renewable energy, water and the production of waste both during construction and when in use;
- i) Not increase the risk of flooding but makes adequate provision for sustainably dealing with foul and surface water drainage and not result in an unacceptable impact upon the water environment;
- j) Consider the needs of a diverse population including those with protected characteristics such as age or disability;
- k) On sites which have previously been developed, new development proposals should make use of existing suitable building materials wherever possible for appropriate uses in order to re-use recyclable materials and reduce the amount of imported materials; and
- l) Ensure that any risks arising from past coal mining, as indicated on the proposals map, can be adequately managed

3.0 Proposed Use

3.1 The proposal is for the erection of three external silos, an external weighbridge and installation of processing plant within an existing industrial building within the CCP Building products site. The site is located within an established industrial estate defined as an employment area as set out in Policy SP2. The proposal is classed as operational development and is not a change of use. In line with Policy SP8, the proposal would support a vibrant, diverse and competitive local economy that provides a range of job opportunities to enable new and existing businesses to grow. In addition, it would support the spatial strategy of Policy EM1 to assist economic competitiveness, encourage entrepreneurship, promote the growth of indigenous businesses and attract inward investment. The proposed silos will be located to the west side of the building

close to the existing silos currently operated by CCP. This part of the building currently comprises plant that accommodates the CCP block manufacturing process.

- 3.2 The applicant, Material Evolution Ltd will produce a low carbon cement to be used by CCP, which will result in reducing the embedded carbon within the CCP block that is manufactured on the site. The proposal represents a sustainable development not only as it relates to an existing industrial site, the new plant would provide for the manufacture of a sustainable cement replacement product using a patented novel technology which is a 100% replacement for traditional cement. Material Evolution Ltd has developed an innovative technology harnessing a 'no heat' process to create a cement product, greatly reducing CO2 emissions when compared to traditional cement manufacture. Typically, traditional cement manufacturing produces 860kg of CO2 per tonne compared to 129kg CO2 produced when manufacturing the Material Evolution cement. This is in accordance with Policy SP18, which promotes development and sustainable growth that reduces carbon emissions and mitigates the causes climate change.
- 3.3 The raw materials required for the new manufacturing process will be stored in the silos with bagged material stock kept to a minimum and stored within the existing CCP building. Two of the proposed silos will not exceed the height of the existing silos on site, which are approximately 17 metres. One of the proposed silos that would contain the finished product, would be 27 metres in height, extending some 9 metres above the existing building and existing silos. This silo is located towards the rear of the west side of the building in front of the steep, well treed embankment. The silos will be finished in a dark green colour to harmonise with the existing building and to reduce the visual impact when set against the backdrop of the wooded embankment. This ensures that the proposal would accord with policies DM1, SP12 and SP15 also referred to below in Section 5.

4.0 Accessibility

- 4.1 The site is accessed from Llay Road onto an internal road also providing access to the frontage unit Huws Gray and through metal gates leading into the CCP site. There are no highway works proposed as the access is as existing and within an area owned by the frontage unit, Huws Gray with CCP having right of access. No members of the public visit the site, only visits by staff and delivery/collection vehicles. Heavy goods vehicles can also access the rear of the CPP site from Aerial Road.
- 4.2 Existing lorry movements to the CCP site include flat-bed or articulated vehicles, on average up to 40 lorries bringing materials to site and 30 lorries removing blocks from site each day. This activity will be increased by an additional 5 - 7 lorries per day, which is a negligible amount when compared to the existing lorry movements. Effectively, 40% of the finished product will be used by CCP to replace cement and other cementitious materials that are currently brought onto site by CCP by tanker. There would be no additional lorry movements associated with this percentage of the production. The remaining 60% production will create an additional 5 - 7 tankers/lorries delivering raw materials and collecting the finished product from site each day. As such, the final product (not used by CCP) will be collected in bulk powder tankers, utilising tankers that have just delivered raw materials in order to minimise lorry movements.

- 4.3 The site has existing dedicated car parking for staff and visitors. The proposed weighbridge will be located adjacent to an area of external storage on hardstanding close to the access road. Plan number ME.P.01. Rev A shows the siting, which has been amended from the original plan that would have resulted in some loss of staff parking at the front of the building. The amended siting will not result in any loss of parking spaces as these will remain as shown on the plan. The existing car parking as shown on the site layout plan will be retained for use by Material Evolution. There is also existing parking for the CCP staff, which will remain unaffected by the proposal shown on the plan (ME.P.01. Rev A). The existing parking spaces are currently under-utilised due to the minimal numbers of staff at the site and it is envisaged that the increase in staff by 4.5FTE can easily be accommodated by the provision of parking on site.
- 4.4 There would be no highway safety implications that would arise associated with the operational development proposed on the site in accordance with Policy DM1.

5.0 Assessment and Character

Visual Amenity

- 5.1 The area is characterised by a mix of industrial units in the immediate area with residential development located a distance away to the south east and a small cluster of houses along Llay Road to the west of the site. The existing industrial building is clad with green colour metal sheeting and block work. The proposal by Material Evolution includes the erection of three silos for storage of raw materials and the finished product of low carbon cement and erection of a weighbridge. The manufacturing process of the new product will take place within the existing building.
- 5.2 The silos will be located to the west side of the building and will be finished in a dark green colour to match the existing building. The height of two of the silos will be 17 meters the same as the existing silos and the height of this part of the building. The adjacent building to the east is similar in appearance with part of the structure slightly increased in height. The larger of the three silos will be located at the rear part of the side elevation and will extend to 27 metres in height, some 10 metres above the existing silos and building. The wooded steep embankment is located along the whole extent of the rear boundary of the site and provides a soft backdrop to this part of the industrial estate. Part of the existing buildings on the CCP site are visible from the road frontage. The image below shows the frontage unit, Huws Gray and the CCP building towards the rear of the site through the palisade gate with the backdrop of trees along the rear boundary. The red cross denotes the approximate location of the largest silo, part of which will extend above the trees. Notwithstanding that the silo will be visible from public vantage points, the appearance of the silo finished in dark green colour against the backdrop of trees, helps to minimise any visual intrusion. In the context of the industrial setting, it is considered that the proposal would not introduce features that result in any harm to the visual amenity of the industrial site and area in general.

Figure 2: View of the site from the road frontage.



- 5.3 The siting, scale and use of materials for the external silos would not appear visually obtrusive that detracts from the surroundings and general character of the area. In this regard, the proposal is in accordance with Policies SP12 and DM1.

Residential Amenity

- 5.4 The nearest houses are along Llay Road to the west and would not be directly affected by the proposal. In terms of any increase in noise and disturbance, the manufacturing process will take place inside the existing building, similar to the existing activities at CCP. Subsequently, there would be no increase in noise that would result in any undue disturbance when compared to the existing manufacturing plant.
- 5.5 The silo with a proposed height of 27 metres would be visible from a distance by the existing houses in the area. However, given the nature and juxtaposition of the houses located adjacent to an established industrial estate, the outlook of the silo would not be viewed as out of place or harmful to the amenity of the occupiers of nearby residential development. Accordingly, there would be no conflict with criterion b) of Policy DM1 of the LDP.

Heritage Impact Assessment

- 5.6 There are four Grade II listed buildings located to the south of the site. Appendix 1 attached at the end of this Statement, contains a map extract with the listed buildings marked on 1-4 with details of the listing description for each, the red area denotes the siting of the operational development. LDP Policy SP15 seeks to conserve, protect, preserve or enhance assets such as listed buildings. The policy goes on to state that the historic environment is central to the character and appearance of Wrexham County Borough contributing to a sense of place and cultural identity.

- 5.7 Technical Advice Note 24 (TAN 24) relates to the Historic Environment. It recognises that the setting of an historic asset includes the surroundings in which it is understood, experienced, and appreciated embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. Setting is not a historic asset in its own right but has value derived from how different elements may contribute to the significance of a historic asset.
- 5.8 Llay Hall Farm and the U- shaped farmyard ranges at Llay Hall Farm are located approximately 500 metres to the south of the application site and both are individually listed. These listed buildings are not visible from Llay Road frontage. The south side of Llay Road has a different character to the north that comprises the industrial estate. It is characterised as rural with open agricultural fields and boundary hedgerows. Llay Hall Farm and the farmyard ranges occupy an enclosed courtyard bounded on all sides by fields, which form the setting of these listed buildings. The established industrial estate has a different character and setting, typically consisting of large, modern, metal sheet clad and blockwork units. The application site is located some distance away from the Llay Hall Farm and farmyard ranges and the proposed development would not be classed as being within the setting of these listed buildings. Notwithstanding, the height of the tallest silo at 27 metres would be visible from the setting of the listed buildings. However, the finished dark green colour and the siting within an established industrial area along with the backdrop of the boundary trees help to minimise any visual impact. The setting of the listed buildings at Llay Hall Farm would not be negatively affected by the development, which effectively neighbours the industrial area.
- 5.9 Llay Miners Welfare Institute and the Pavilion are within 350 metres of the application site located to the south east on the corner of Llay Road and Llay New Road. The Miners Welfare Institute building sits in a prominent position on the corner and is recognised as a late survival of Edwardian Baroque with well detailed features, although some are obscured (at the rear) by later extensions. The pavilion is located in the grounds further to the south bounded by fields and a modern housing development at Mottram Gardens. Again, similar to the Llay Hall Farm site, the Miners Welfare Institute and Pavilion are located within their own setting. The industrial estate on the opposite side of Llay Road has been developed over time around the listed buildings as has the modern housing development along Llay New Road and Mottram Gardens. Part of the tallest silo would be visible in the skyline. However, the industrial nature of the area located on this part of Llay Road forms part of the character and identity of the area. The finished dark green colour of the silos would not detract from the setting of these listed buildings.
- 5.10 TAN 24 and LDP policy SP15 recognises the importance of protecting historic assets. In particular, TAN 24 makes note that the setting of an historic asset can evolve, much in the way that the industrial area and new housing has developed around the listed buildings, changing the character by the mix of uses and mix, scale and appearance of buildings. The extent of the surroundings of an historic asset is not fixed and may change as the surroundings evolve, which is the case for this part of Llay. The proposed development would not result in any significant harm to the listed buildings or their settings and would have a neutral impact, and is in compliance with LDP policy SP19 and TAN 24.

6.0 Community safety

- 6.1 The site is not visited by members of the public and as such, the proposal will not have any negative impact on community safety.

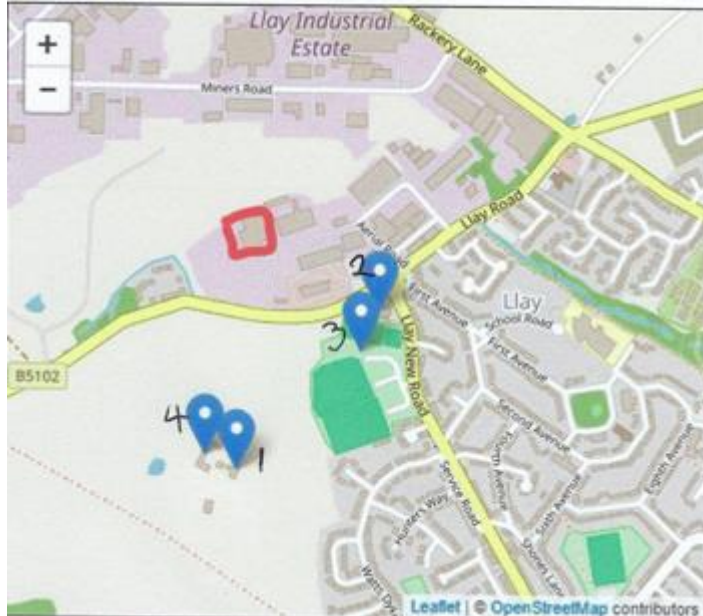
7.0 Environmental sustainability

- 7.1 A Preliminary Ecological Assessment (PEA) had been carried out and is submitted with the application. The PEA refers to the appropriate planning policies, statutory non-statutory designations and refers to the legislative background for nature conservation and ecology. The PEA concludes that there is no detrimental impact on habitats or wildlife. In addition, there will be no loss of trees or vegetation on the site or any harmful impact to the existing trees and wooded area on the embankment adjacent to the rear boundary of the site. A Green Infrastructure Statement is submitted with the application.
- 7.2 No process waste will be produced as part of the proposal. The main benefit of the development is that a sustainable alternative to the production of cement is proposed. This would significantly reduce the carbon emissions from the site and serves to mitigate the cause of climate change and represents sustainable development.
- 7.3 The proposal would have no harmful impact on nature conservation, protected species or result in a loss of trees and accords with LDP policies SP14, SP18 and SP19.

8.0 Conclusion

- 8.1 For the reasons set out above, the proposal is considered to be an acceptable development in this area. It represents a sustainable development that will actively reduce carbon emissions in line with climate change resilience. The proposal will support a new innovative way of producing an alternative to cement. It supports a new business at an existing site, therefore encouraging entrepreneurship whilst promoting growth at the existing CCP site by attracting inward investment with increased employment opportunities in the area. There are no highway safety implications as any increase in vehicle movements is negligible and the site is accessed via an existing access.
- 8.2 The proposal is appropriate to the site and surroundings with no detrimental impact on the character or amenity of the area including the setting of the listed buildings. There would be no harm to nature conservation, wildlife or result in a loss of trees or vegetation. Accordingly, there is no conflict with the adopted policies set out in this Statement. Therefore, taking into account the provisions of the development plan and all other material planning considerations, it is recommended that planning permission be granted.

Appendix 1 – Details of Listed Buildings



1. Llay Hall Farm

Situated at the end of a farm track running south off the B5102, partially surrounded by the remains of a moat.

Listed despite alterations as a sub-medieval house of considerable importance. Pebble-dashed stone with some exposed timber-framing; slate roof and pebble-dashed chimneys. 2-and 3-storey, the cross wing has stone copings to gable ends one of which retains a ball finial. At front, 3-storey projecting gabled wing to left with further gable to right hand return. The hall range is set at right angles; the roof has been modified to light an inserted upper floor; C20 entrance. Later extension is attached to the right, and the return elevation has a decorative arch-braced crown post truss partially visible in the gable end. The rear part of the cross wing has an attached lower 2-storey stone-built range with a hipped roof and a large external stack on the rear elevation. Left hand return elevation of cross wing has 2 tall external chimneys.

2. Llay Miners Welfare Institute

Situated on the north edge of the village facing diagonally across the junction between B5120 and B5425. Semicircular forecourt with contemporary railings and boundary wall.

Built 1929-31 by F A Roberts, architect of Mold. Stylistically a late survival of Edwardian Baroque well detailed and in parts reminiscent of the style of C J and Sir Reginald Blomfield.

2-storey; painted pebbledash elevations with freestone plinth, channelled pilasters and bracket cornice. Green slate roofs, the main part being hipped with

octagonal bellcote; roughcast chimney stacks with dentil cornices. Symmetrical front; 5 bays to centre with balustraded parapet, emphasised central bay with segmental pediment and full width portico contained by the projecting gable ended cross wings with semi-pediment treatment. Set back at both ends are single bays with similar parapet. First floor windows to centre are small pane round arched headed divided into 3-lights and with lugged architraves, keystones and aprons. Similar style Venetian windows to first floor of gabled bays with bracket cills; 2-windows below. Ground floor windows are cross-frame with voussoirs and bracket cills. Balustraded parapet to portico with dentil cornice and paired Doric columns to ends and centre, flanking modern entry. The extreme end bays have panelled double doors and Venetian windows to their side elevations. Beyond are 3-window end elevations to the long hipped roof part with round arched headed and cross frame windows as on the front - some are blocked on right hand side. The especially grand rear elevation has been partly obscured by a later single storey extension. 7-bays with channelled deep pilasters, emphasis stepped up towards the middle with central three bays ornamented by balustraded parapet and urns. First floor windows, as on the front all retaining small pane glazing intact.

3. Pavilion at Llay Miners Welfare Institute

Situated on the north edge of the village immediately beyond the bowling greens at the rear of the Miners Welfare Institute. Playing fields behind.

Probably contemporary with the Miners Welfare Institute, built 1929-31 by F A Roberts, architect of Mold. Now used as cricket, bowls and rugby pavilion.

Stylistically a greatly simplified variation of the Edwardian Baroque of the main building, scaled down to suit this building type. Single storey with painted pebbledash elevations and freestone dressings including plinth and channelled pilasters. Hipped green slate roof with louvred bellcote. Recessed broad central entrance with Doric columns. Small pane casement windows with high transoms; cross frame within the central porch, 3-light to either side. Late C20 enlargement to centre rear.

4. U-shaped Farmyard Ranges at Llay Hall Farm

Reached from a farm track running south off the B5102, situated immediately to the west of Llay Hall Farm.

Mid C19 farmyard ranges serving Llay Hall Farm replacing a range of timber-framed farm buildings shown, approximately on the site of the present buildings, in an engraving of 1794.

U-shaped range of 2-storey red brick barns with slate roofs, all-round brick band course and a dentil eaves cornice. High camber-headed cart entrance into the yard with keystone and brick voussoirs. The elevations facing the yard have camber-headed windows and boarded loft doors; some openings remodelled in C20. The upper floor has both diamond and diaper pattern ventilation holes and the gable ends of the end ranges have dove boxes and ledges.

