

The Planning Service
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Our ref: 5125-CAU-XX-XX-CO-T-9004.A0-C1

Date: 13 September 2024

By E-mail Only

Dear Sir,

**Erection of a storage and distribution unit (Use Class B8).
Land to the north of Bridge Road North, Wrexham Industrial Estate, Wrexham.
Planning Application Ref: P/2023/0446**

We refer to the application that we have submitted for outline planning permission for the erection of a storage and distribution unit, improvements to the existing site access, the construction of an internal site access road, car parks and service area and the erection of a cycle shelter and security fencing, together with associated landscaping and ecological mitigation measures (Details of landscaping reserved for subsequent approval) on land to the north of Bridge Road North, Wrexham Industrial Estate, Wrexham Planning Application Ref: P/2023/0446.

We now wish to amend the submitted planning application and enclose copies of the following documents and plans:

- a) This covering Letter (Ref 5125-CAU-XX-XX-CO-T-9004.A0-C1);
- b) Proposed Site Plan. Ref 2002.P.003 Rev B;
- c) Proposed Floor Plan. Ref 2002.P.004 Rev B;
- d) Proposed Elevations. Ref 2002.P.005 Rev B;
- e) Phase 2 Ecological Surveys Reports (Etive Ecology, September 2024);
- f) Great Crested Newt Mitigation Strategy (Etive Ecology, September 2024); and,
- g) Green Infrastructure Statement (Etive Ecology, 12/09/24).

The above mentioned documents and plans supersede the following previously submitted plans :

- a) Proposed Site Plan. Ref 2002.P.003 Rev A;
- b) Proposed Floor Plan. Ref 2002.P.004 Rev A;
- c) Proposed Elevations. Ref 2002.P.005 Rev A;
- d) Proposed Ecological Enhancements. Ref 2002.P.006 Rev A;



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The amended scheme responds to the provisions of the adopted Wrexham Local Development Plan (LDP), the updated version (Edition 12, February 2024) of Planning Policy Wales (PPW), the results of ecological surveys of the site, undertaken throughout the summer of 2024, and includes a strategy for Great Crested Newt mitigation.

In particular, the size of the proposed storage and distribution unit has been reduced by 35% to 3393m² (previously 5210m²), with a commensurate reduction in car parking provision. In addition, the proposed overall built developed area has been reduced to 7660m² (previously 10,410m²), whilst the area of mitigation has been increased to 73404m² (previously 4696m²) and now represents 49% of the overall site area (previously 31%).

Wrexham Local Development Plan

The Wrexham Local Development Plan (LDP) was adopted in December 2023 and, therefore, provides up to date guidance on development within the Local Authority area.

The application site is located within Wrexham Industrial Estate. As indicated on the LDP Proposals Map Inset 3, part of the north eastern boundary of the site is included within the Wrexham Industrial Estate Strategic Ecological Network (SEN), whilst the remainder of the application site is identified as an Employment Area.

The SEN extends along, but outside of, the north western and south western boundaries of the application site; in addition, the SEN extends in a north easterly direction beyond part of the north eastern boundary of the application site.

The proposed built development is located entirely within the allocated Employment Area, with no development whatsoever proposed within the allocated SEN. Those parts of the allocated Employment Area which are not proposed for built development will be used to provide on-site ecological mitigation and enhancement.

As indicated above, the proposed built development is located entirely within an allocated Employment Area and, therefore, accords with the locational guidance contained in LDP Policy SP2.

LDP Policy SP8 acknowledges that Wrexham is a key economic driver in North Wales and the wider region. The Policy seeks to promote economic growth and employment opportunities on Employment Areas, whilst, at the same time, safeguarding the Strategic Ecological Network (SEN). The proposed development accords with the provisions of Policy SP8 by promoting economic development, protecting the SEN within the application site and improving linkages and continuity with the SEN on adjacent sites.

LDP Policy SP9 confirms that Wrexham Industrial Estate is the County Borough's Key Business Sector Area and will be the primary focus for new employment development over the plan period for class B1, B2 and B8 employment. Land is also protected on the Estate as a Strategic Ecological Network for a number of local, national and internationally protected species and habitat. The proposed development accords with provisions of LDP Policy SP9 by balancing successfully the need for essential economic development and the protection of species and habitats.

LDP 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. Allocated Employment Areas at Wrexham Industrial Estate are confirmed as falling within the scope of this Policy. 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” and follows on from the recommendations of the Employment Land Review. The Policy promotes entrepreneurship by providing certainty for developers. The built development now proposed is situated entirely within an allocated Employment Area and represents exactly the type of use and purpose for which the land is protected under Policy EM1.

LDP Policy SP14 confirms that development will only be permitted where it seeks to protect, conserve and enhance the natural environment. The text that accompanies the Policy advises that the natural environment is one of Wrexham County Borough’s greatest resources and confirms that the policy approach recognises the potential conflict in accommodating growth and protecting natural assets and seeks to balance this conflict by identifying and protecting the designations and assets which are of most significance to the County Borough. The LDP acknowledges the need to strike a balance between having regard to the relative significance of international, national and local designations, in considering the weight to be attached to nature conservation interests, but advises that care must be taken to avoid placing unnecessary constraints on development. The proposed development accords with the provisions of Policy SP14 by confining built development to that part of the application site allocated as an Employment Area, protecting the allocated SEN within the application site and incorporating significant ecological mitigation measures to ensure that protected species and habitats are benefitted.

LDP Policy NE1 states that development likely to affect any protected species will only be permitted when there is no satisfactory alternative and if there is no detrimental impact to the maintenance of the population concerned at a favourable conservation status in its natural range. The proposals must adequately demonstrate that they are for the purposes of preserving public health or safety or reasons of overriding public interest. As indicated above, the built development now proposed is located entirely on land allocated as an Employment Area; such designation follows on from an extensive review of potential alternative sites by the County Borough Council. The submitted Great Crested Newt Mitigation Strategy Report (Etive Ecology, September 2024) concludes that, as a result of the proposed mitigation measures there should be an improvement in the Favourable Conservation Status of the local GCN population. In addition, there is an overriding public interest in support of the proposed development as it will contribute positively to promoting economic development, in accordance with the County Borough Council’s stated policies for this key business sector area. The proposed development accords, therefore, with the requirements of Policy NE1.

On those parts of the application site that are not proposed for built development, the retained habitat will be retained and enhanced through scrub control and turf relocation of spiny retharrow that would be otherwise lost to the development footprint, in accordance with a long term Habitat Management Plan, in order to protect the grassland long-term and enhance its value for butterflies and botanical interest. The proposed development accords, therefore, with the requirements of LDP Policy NE2.

Phase 2 Ecological Surveys

A Phase 2 botanical survey, together with a series of butterfly transect surveys at the application site were undertaken in Summer 2024. The submitted Phase 2 Ecological Surveys Reports (Etive Ecology, September 2024) provides a description of the surveys undertaken and an appraisal of the results.

The existing grassland on site was subject to a botanical survey, with particular focus given to the presence and extent of spiny retharrow. A total of six butterfly surveys were also carried out to establish the presence/absence of grizzled skipper and dingy skipper.

The surveys confirmed that the grassland is species-rich and unimproved. Spiny retharrow is locally abundant in parts of the site. However, neither of the two target species of butterfly were recorded during any of the survey visits. All of these ecological receptors – unimproved grassland, spiny retharrow and butterflies – were assessed to be of significance at the Local Scale.

The proposed layout of the scheme has been redesigned as a result of the 2024 ecological surveys. The footprint of the proposed built development has been reduced significantly and has been shifted towards the western side of the site, in order to reduce impacts on spiny retharrow. The layout also takes into account the Strategic Ecological Network (SEN) which runs across the eastern portion of the application site.

The SEN will be enhanced by the protection and long-term security of additional areas of grassland which will, in turn, improve the connectivity to other areas of SEN beyond the application site boundary

The retained grassland areas will be protected during construction and, thereafter, will be enhanced through scrub control and turf translocation of spiny retharrow that would otherwise be lost to the development footprint.

A long-term Habitat Management Plan will be prepared and agreed for the site and will be aimed at protecting the grassland long-term and enhancing its value for butterflies and its botanical interest.

Great Crested Newt Mitigation Strategy

The submitted Great Crested Newt Mitigation (GCN) Strategy (Etive Ecology, September 2024) provides existing data relating to GCN in close proximity to the application site, together with a proposed strategy to mitigate the likely impacts of the proposed development on GCN and to deliver long-term site security for the species.

Existing habitat outside of the building footprint will be retained, protected and created, including grassland, four hibernacula and scattered trees/scrub. These habitats will be managed in such a way that they will provide habitat of enhanced suitability for GCN and will be managed for the benefit of GCN and other wildlife.

The mitigation measures proposed will ensure that there will be no loss of functionality for GCN post development and will also ensure no significant long-term impacts on the GCN population at the Site, Local or County level. The proposed monitoring regime will ensure that the mitigation strategy is successful, with no medium to long-term impacts on the species.

As a result of the implementation of the measures set out indicated in the Mitigation Strategy and included in the proposed Habitat Management Plan, it is concluded that there will be an improvement in the Favourable Conservation Status (FCS) of the local GCN population.

Planning Policy Wales (Edition 12, February 2024) (PPW)

Planning Policy Wales, Edition 12 (PPW) was published on February 2024. Chapter 6 of Planning PPW advises that a 'step-wise' approach to development must be taken to ensure that biodiversity is considered throughout the design process.

The original proposed site layout (Ref 2002.P.003 Rev A) has been superseded by the amended layout now submitted (Ref 2002.P.003 Rev B). The amended layout has been designed following the results of the surveys referred to herein and takes into account the following ecological considerations:

- The Strategic Ecological Network identified in the Wrexham LDP.
- The prevalence of spiny reedbed in the eastern portion of the site.
- The distribution of butterfly encounters around the eastern, northern and western edges of the site with few in the centre of the site: and,
- The likely presence of GCN within ponds <500m of the site.

These considerations have led to a 35% reduction in the size of the proposed storage and distribution unit, whilst the area of mitigation has been increased to 49% of the overall site area, from the previous figure of 31%).

The amended site layout also has regard to the practical requirements of the end-user, such as access, drainage, parking, the size of the yard, turning circles etc.

The submitted Green Infrastructure Statement (Etive Ecology, 12/09/24) explains how the stepwise approach, as required by PPW, has been applied to the proposed development and that, as a result of the ecological measures embedded within the proposed scheme, it is anticipated that there will be a demonstrable net benefit for biodiversity.

It is considered that the development, as now proposed, is entirely consistent with the requirements of Chapter 6 of PPW.

Conclusion

The amended scheme hereby submitted responds to the provisions of the adopted Wrexham Local Development Plan (LDP), the updated version (Edition 12, February 2024) of Planning Policy Wales (PPW) and the results of ecological surveys of the site, undertaken throughout the summer of 2024, and includes a strategy for Great Crested Newt mitigation.

It is considered that the amended proposals strike an appropriate balance between economic development and the safeguarding and enhancement of biodiversity.

We would request that the Local Planning Authority now grant planning permission for the proposed development.

We confirm that we agree to extend the period within which the Local Planning Authority may determine this application up to and including Friday 25th October 2024.

If you require any additional information or clarification, please do not hesitate to contact us.

Yours faithfully

[Redacted Signature]

Howard Jones. DipTP, MRTPI
Technical Director of Planning
 On behalf of Caulmert Ltd