

Planning Statement

On behalf of Thermotrafic Ltd

**Norish Cold Storage,
Wrexham Industrial Estate**

March 2024

Document control

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1.0 Introduction & Background

1.1 Background

1.1.1 This Planning Statement (PS) has been prepared by CarneySweeney (CS) on behalf of the applicant, Thermotrafic Ltd, in support of a full planning application for the extension of the existing cold storage facility buildings together with access and car parking alterations, landscaping and associated works, at Norish Cold Storage, Ash Road South, Wrexham Industrial Estate, Wrexham, LL13 9UG (herein referred to as 'the site').

1.1.2 This report explores the planning merits for the proposal, through the consideration and assessment of key national & local planning policies and material considerations.

1.2 Report Structure

1.2.1 The report assesses the requirements of local and national planning policy relevant to this location and is structured as follows:

- Section 2: describes the site and surrounding context, relevant planning history, the proposed development, and pre-application consultation;
- Section 3: sets out the local and national planning policy context;
- Section 4: address the principal planning considerations; and
- Section 5: provides a summary of conclusions.

1.2.2 This Statement is accompanied by a suite of technical reports and application drawings which are referenced where appropriate.



2.0 The Proposed Development

2.1 The Application Site and surroundings

- 2.1.1 The application site is outlined in red on the submitted Site Location Plan. It extends to approximately 3.26ha and is located within Wrexham Industrial Estate, c. 4.5km east of Wrexham city centre. The site comprises an existing large cold storage facility, with plant buildings attached (extending to c. 9,097sqm GIA), positioned centrally within the site. There is also an office block in the south of the site extending to c.620sqm.
- 2.1.2 The facility itself provides storage for multi-temperature-controlled products. It includes:
- 15,000 pallet spaces;
 - Frozen, chilled and ambient storage;
 - Blast freezing & tempering;
 - Order picking/ consolidation;
 - Customs Warehouse; and
 - Cross-docking, depot facilities and parking.
- 2.1.3 The site contains a large, surfaced area to the south of the storage building, utilised for car parking, loading bays and servicing yard. There is also an existing small office building to the south of the site. An internal access road travels around the perimeter of the building, providing vehicular access from the main servicing yard to the rear workshop and plant rooms to the north, where there is another area for car parking. Vehicular access to and from the site is served by the entrance to the south-west of the site, from Ash Road South.
- 2.1.4 Grass and scattered trees immediately surround the building and internal perimeter road, whilst the site boundary is bordered by a wide landscape buffer of scrub and woodland, which is particularly dense at the northern and eastern boundaries. A small watercourse travels along part of the western boundary of the site.
- 2.1.5 The site constitutes brownfield land, lying within the Wrexham Industrial Estate settlement limit.
- 2.1.6 The site's immediate and wider surroundings are characterised by mixed industrial/storage and warehousing uses occupying the Industrial Estate.
- 2.1.7 The site is not affected by any landscape, ecological nor heritage designations.



2.2 Planning History

2.2.1 A review of the Council's planning history identifies the below applications relevant to the site:

- Ref: 21955 - Erection of foodcare and food storage facility and alteration to existing vehicular access. Approved 16 March 1994.
- Ref: 22573 - Erection of new office building to serve new cold store. Approved 10th August 1994.
- Ref: CB00887 - Siting of liquid nitrogen storage vessel adjacent to loading bays. Approved 18th February 1997.
- Ref: P/2011/0044 – Construction of 8M x 8M stand alone building to house electricity generators. Approved 7th March 2011.



2.3 The Proposed Development

2.3.1 The description of the proposed development is:

“Extension of existing cold storage facility building, access and car parking alterations, landscaping and all associated works”.

2.3.2 The proposed extensions are for industrial/cold storage use (Class B2/B8). The scheme comprises 4 main built elements:

- Cold store extension – to the west of the existing building (6,160sqm; 32m height)
- Plant building no.1 – to the north west of the existing building (499sqm; 10m height)
- Plant building no.2 – to the north east corner of the existing building (200sqm; 7.5m height)
- Production extension – to the south east corner of the existing building (394sqm; 9m height)

Total new floorspace = 7,253sqm (GIA)

2.3.3 As part of the works, 2no. Dawson units (temporary freezer stores) and a generator storage building are to be demolished (totalling approximately 100sqm).

2.3.4 No works are proposed to the office building.

2.3.5 The principal cold store extension is proposed at the western elevation of the existing facility and extends to a maximum height of c.32m. The height of the other 3no. ancillary plant and production extensions are significantly smaller in scale and located as outlined above and on the enclosed application drawings.

2.3.6 The existing service yard is proposed to be reconfigured with an area for HGV parking and new loading dock for the cold store extension.

2.3.7 Creation of a second vehicular access into the site is proposed, utilising the existing bellmouth adjacent to the access road from Ash Road South. This new access will serve the service yard for HGV access only. Meanwhile the existing access will serve the staff car parking areas and existing office.

2.3.8 The staff car parking area will be reconfigured to provide a total 53 parking spaces (39 at the main car park and 14 overspill spaces to the west). Parking provision includes disabled bays and electric vehicle charging facilities.

2.3.9 16no. cycle parking spaces are to be provided in two bike shelters containing Sheffield stands adjacent to the existing office.

2.3.10 Please refer to the enclosed plans and Design & Access Statement for full details.

2.4 LPA Pre-Application Consultation



2.4.1 The application submission follows discussions with Wrexham County Borough Council planning officers initiated in August 2023 whereby initial draft proposals were formulated and issued to the LPA for comment under pre-application ref: ENQ/2023/0165.

2.4.2 A formal pre-application and EIA screening response was received from the LPA in September 2023 providing advice covering the following points:

- The development is considered not to fall within Schedule 2 of the EIA (Wales) Regulations and therefore it was deemed not necessary to screen the development for EIA.
- Site falls within the settlement limit of Wrexham Industrial Estate, whereby employment development, including extension to existing industrial premises, is acceptable in principle subject to compliance with other relevant policies.
- The development appears to encroach upon the Industrial Estate Strategic Ecological Network.
- Ecology – surveys required in order to assess whether the development accords with guidelines in LPGN29 (a former UDP policy). The application should demonstrate that the proposals will not adversely impact upon statutory species and must also provide net benefit to biodiversity (NBB).
- Phosphates – impact upon River Dee and Bala Lake Special Area of Conservation (SAC) must be considered.
- Flood Risk – A full application must include a Flood Consequences Assessment (FCA) to demonstrate compliance with TAN 15. Further information, such as the need for development, number of new jobs to be created, should be submitted with the application.
- Trees – an Arboricultural Impact Assessment would be required for a full application. Existing tree coverage should be maintained wherever possible.
- Highways – Transport Assessment recommended and should include swept path analysis for 16.5m long HGVs. The TA should also consider the adequacy of the amount of car parking provision proposed.

2.5 Pre-application Consultation (PAC)

2.5.1 The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (“the 2016 Order”) sets out the requirements to undertake pre-application consultation (PAC) in respect of all planning applications for major development. Accordingly, following LPA consultation, PAC was carried out prior to application submission.

2.5.2 The application is accompanied by a PAC Report which provides full details of the pre-application consultation carried out from 19th February 2024 – 18th March 2024. Please refer to the PAC Report for an overview of how consultation feedback has been addressed in the application proposals.



3.0 Planning Policy Context

3.1 Introduction

- 3.1.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that: *“If regard is to be had to the Development Plan for any purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the Plan unless material considerations indicate otherwise”*.
- 3.1.2 The statutory development plan for the application site comprises Future Wales: The National Plan 2020 and the Wrexham County Borough Local Development Plan (LDP) (adopted December 2023).
- 3.1.3 Material considerations at a local level include relevant Supplementary Planning Guidance. Other material considerations at a national level include Planning Policy Wales and relevant Technical Advice Notes (TANs). The policies of relevance to the proposed development at both a local and national level are considered in detail below.

3.2 Future Wales: The National Plan 2040 (February 2021)

- 3.2.1 Future Wales is the Welsh Government’s highest tier of development plan in Wales. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole. Under policy 1 of this document, ‘where Wales will grow’, the Welsh Government supports sustainable growth in all parts of Wales. In the three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas include **Wrexham** and Deeside.
- 3.2.2 Policy 9 ‘Resilient Ecological Networks and Green Infrastructure’ notes the importance of enhancing ecosystems, biodiversity and green infrastructure when considering approaches to development proposals through nature-based methods.
- 3.2.3 Policy 12 ‘Regional Connectivity’ refers to improving the connectivity in urban areas by integrating active and sustainable travel and public transport. Active travel is encouraged in all new developments.

3.3 Wrexham County Borough Local Development Plan (adopted 2023)

- 3.3.1 The Wrexham Local Development Plan (LDP) provides a framework for delivering sustainable development in Wrexham up to 2028.
- 3.3.2 The relevant policies in the LDP include the following:
- **SP2 – Location of development.** New development is directed to the defined settlement limits and employment areas identified on the Proposals Map.
 - **SP5 – 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.



- **SP8 – Economic Growth, Employment and Enterprise.** The Plan seeks to diversify the local economy and widen the economic base by, *inter alia*, ensuring provision of employment land; improving the quality of employment sites supply within Wrexham Industrial Estate and protecting a strategic ecological network for a number of local, national and internationally protected species and habitats; providing growth to deliver approx. 4200 jobs.
- **SP9 - Wrexham Industrial Estate.** Wrexham Industrial Estate as shown on the proposals map 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 for a strategic ecological network for a number of local, national and internationally protected species and habitat.
- **SP11 – Transport and Accessibility.** Wrexham's transport network will be developed in a safe, efficient and sustainable manner through, *inter alia*, restricting development that would have an unacceptable impact on the safe and efficient operation of the transport network.
- **SP12 – Design Principles.** Development must be of high quality, sustainable design which makes a positive contribution to the creation of locally distinctive places.
- **SP13 - Health and Wellbeing.** All development should seek to reduce health inequalities and provide opportunities for healthy lifestyles and improving health and well-being, including mental health, by addressing the physical, economic and social determinants of health.
- **SP14 – Natural Environment.** Development will only be permitted where it seeks to protect, conserve and enhance the natural environment.
- **SP18 – Climate Change.** To mitigate effects of climate change and adapt to its impacts, development proposals need to demonstrate they take into account, *inter alia*, reducing carbon emissions, protecting and increasing carbon sinks, promoting energy efficiency, maintaining ecological resilience.
- **SP19 – Green Infrastructure.** Wrexham's distinctive natural heritage provides a network of green and blue infrastructure. Protection, conservation and enhancement of natural heritage networks needs to be reconciled with the benefits of development.
- **EM1 - Protection of Existing Employment Land.** existing employment areas as shown on the Proposals Map, Wrexham Industrial Estate, including will be protected for B Use Class employment generating uses.
- **NE1 - International and National Nature Conservation Designations.** 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.

- **NE3 - Trees, Woodland and Hedgerows.** 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.
- **NE6 - Water Treatment and River 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 the treatment of waste water. To ensure no adverse effect on the integrity of the River Dee and Bala Lake SAC, development creating waste water discharges will be required to demonstrate there is no increase in phosphorus levels in the SAC.
- **DM1 - Development Management Considerations.** is a multi-criterion- based policy which requires all new development to, *inter alia*: ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site; make best use of design techniques; and safeguard sites and areas of nature conservation and wildlife interest etc.
- **T1 - Management Transport Impacts.** Developments will be supported where they, *inter alia*, facilitate sustainable travel first, then public transport, and finally by private car; mitigate any significant adverse effects upon the transport network; do not compromise safe, effective and efficient use of the highway network; provide appropriate parking. Developments that would generate significant amounts of movement should be accompanied by a Transport Assessment and Travel Plan.
- **T2 - Active Travel.** To enable people to access employment, education, healthcare and other essential services, new development will be supported where, *inter alia*, facilities that encourage and promote Active Travel are provided.
- **RE1 – Development and Renewable Energy/Low Carbon Technology.** Developers of major sites (exceeding 1000sqm) are required to incorporate schemes which generate renewable energy and low carbon technologies unless it is demonstrated that it would not be financially or technically viable to do so. An independent energy assessment investigating financial viability and technical feasibility of incorporating such schemes will be required.

3.4 Other Material Considerations

The Well-Being of Future Generations (Wales) Act 2015

3.4.1 The Well-Being of Future Generations (Wales) Act 2015 requires “public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle”. The Act sets out seven ‘well-being’ goals as follows:

1. A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on



climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.

2. A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
 3. A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
 4. A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
 5. A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
 6. A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
 7. A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.
- 3.4.2 Within the Act, sustainable development is defined as follows: "the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals".
- 3.4.3 The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

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

- 3.4.4 In accordance with the Well-Being of Future Generations (Wales) Act 2015, the primary objective of PPW, as set out at Paragraph 1.2, 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"*.
- 3.4.5 PPW sets out that, in order to maximise well-being and the creation of sustainable places, the concept of 'placemaking' should be at the heart of the planning system. It is stated at Paragraph 2.8 that development proposals *"must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven wellbeing goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural*



benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle". Paragraph 2.9 goes on to clarify that "The most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making, planning policy and decision making".

3.4.6 PPW defines placemaking as follows: *"Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and well-being in the widest sense".*

3.4.7 A set of 'national sustainable placemaking outcomes' are outlined within PPW, which it advises should be used to inform the assessment of development proposals. The national outcomes are defined as follows:

- Creating and Sustaining Communities
- Making Best Use of Resources
- Maximising Environmental Protection and Limiting Environmental Impact
- Growing Our Economy in a Sustainable Manner
- Facilitating Accessible and Healthy Environments

3.4.8 It is stated at Paragraph 2.15 that *"The outcomes provide a framework which contains those factors which are considered to be the optimal outcome of development plans and individual developments".*

3.4.9 Paragraph 2.20 clarifies that *"not every development or policy proposal will be able to demonstrate they can meet all of these outcomes, neither can it necessarily be proved at the application or policy stage that an attribute of a proposal will necessarily lead to a specific outcome. However, this does not mean that they should not be considered in the development management process to see if a proposal can be improved or enhanced to promote wider well-being. It is for developers and planning authorities to identify these opportunities and act upon them".*

Economic Development Policy

3.4.10 Paragraph 5.4.1 states that *"For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes".* Paragraph 5.4.2 goes on to confirm that *"Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services".*

3.4.11 In assessing the sustainable benefits of development paragraph 2.26 states local planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process. Economic considerations include:



- The numbers and types of long term jobs expected to be created or retained;
- Whether and how far the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing employment opportunities or upgrading the environment;
- the contribution development would make to wider spatial strategies, for example for the growth or regeneration of certain areas.

Green Infrastructure

- 3.4.12 The use of the stepwise approach in demonstrating green infrastructure enhancement is made explicit in PPW Chapter 6.
- 3.4.13 Paragraph 6.4.15 states the first priority is to avoid damage to biodiversity in its widest sense. Where there may be harmful environmental effects, the LPA will need to be satisfied that any reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered. Applicants, in discussion with planning authorities must seek to minimise the initial impact on biodiversity and ecosystems.
- 3.4.14 Where, after measures to minimise impact, biodiversity and ecosystems could still be damaged, or lost through residual impacts, the proposed development should mitigate that damage. Mitigation measures must be put in place to limit the negative effects of a development.
- 3.4.15 All development must deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed). Even if the biodiversity value has been maintained, there must still be a pro-active process to look for and secure enhancement through the design and implementation of the development.

Technical Advice Notes

- 3.4.16 Technical Advice Notes (TANs) are documents that provide a detailed planning advice to Local Planning Authorities (LPAs) and the LPAs should take them into account when preparing a development plan and TANs should be read in conjunction with the PPW.
- 3.4.17 The following technical advice notes are also relevant to the application site:
- Technical Advice Note 5: Nature Conservation and Planning
 - Technical Advice Note 12: Design
 - Technical Advice Note 15: Development and Flood Risk
 - Technical Advice Note 18: Transport



4.0 Principal Planning Considerations

4.1 Introduction

4.1.1 This section addresses principal planning policy matters relating to the proposed development, namely:

- Principle of Development
- Design, Appearance & Landscaping
- Ecology, Trees and Green Infrastructure
- Flood Risk and Drainage
- Transport
- Economic Benefits
- Ground Contamination
- Energy

4.2 Principle of Development

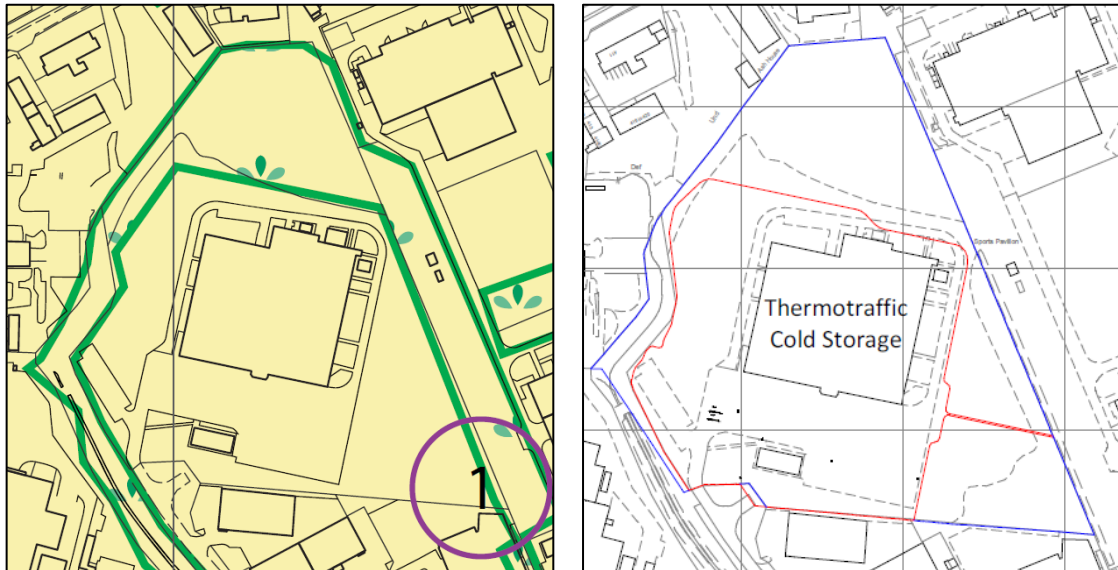
4.2.1 Policy SP2 directs new development to the employment areas identified in the proposals map. Accordingly, the site lies within the Wrexham Industrial Estate settlement boundary, which is a defined area protected for employment use (B1/B2/B8 use) under LDP Policy EM1. The site forms part of one of the largest areas of potential employment development in the County. We understand the Estate covers approximately 550ha in total and is the largest industrial estate in Wales and one of the largest industrial estates in Europe. The principle of the proposed additional industrial (B2/B8 use) floorspace at this location is therefore supported.

4.2.2 The site constitutes previously developed (brownfield) land, the reuse of which is advocated within local and national planning policy. The site is already in industrial storage (Class B2/B8) use and the proposal seeks to extend the facility to improve the efficiency and viability of the business, which also accords with Policy SP8 in respect of seeking provision of employment land, new jobs, and improvements to the quality of sites in Wrexham Industrial Estate.

4.2.3 With regard to the principle of development, the LPA Pre-Application response noted that the site abuts the Wrexham Industrial Estate Strategic Ecological Boundary, which is protected land for a strategic ecological network as per LDP Policy SP9. As can be seen from the figures below, the development area does not encroach upon this ecology boundary, save for a very minimal area in the north-western corner of the site boundary. The woodland to the north of the site and watercourse to the west remain outside the



development area and the protection of these areas is explored further in this Planning Statement in relation to ecology and green infrastructure.



(Left) Figure 1: Extract from LDP proposals Map (Strategic Ecological Boundary outlined green)
(Right) Figure 2: Site Location Plan (development area outlined in red)

- 4.2.4 As advised at pre-application stage, officers consider the principle of the proposed development to be acceptable, subject to compliance with other relevant LDP Policies. The proposed redevelopment is considered to accord with LDP Policies SP2, EM1, SP8 and SP9.

4.3 Design, Appearance and Landscaping

- 4.3.1 A Design & Access Statement (DAS) has been prepared in support of the application.
- 4.3.2 With regards to detailed design considerations, the proposed development has specific operational requirements that have influenced the scale and design of each of the proposed extensions and accordingly, the proposed layout of the site. For instance, the height of the proposed cold store extension has been determined by the height of the automated storage racking system to be installed, which has been chosen for its technological abilities to improve the efficiency of operations on site.
- 4.3.3 Operational requirements necessitate an extension of this scale, which is deemed appropriate to the existing and proposed use of the building; the substantial grounds within which it sits (which can adequately accommodate it); the industrial character of the existing building; and the surrounding land uses on the Industrial Estate. Indeed, industrial estates subsist to accommodate large utilitarian building and uses of this nature so that they may operate harmoniously and with undue impact on non-industrial land uses and amenity. Existing vegetation and trees also provide a visual screen/buffer and backdrop to the proposed extension.
- 4.3.4 The proposed materials have been chosen to be durable and robust, to ensure efficiency and longevity of the building, as well as to provide visual integration with the site and surroundings. Freezer stores are traditionally



coloured white, to reduce thermal build up and ensure that the refrigeration equipment is not overtaxed. However, on the southern face of the cold store extension, the white panels are proposed to be combined with blue panels, consistent with the blue colour utilised on the cladding of the smaller extension buildings beneath. The panelling assists in visually breaking up and ‘reducing’ the bulk of the extension.

4.3.5 A detailed landscaping scheme has also been prepared for the site to improve which benefits the overall visual appearance of the development, including new planting proposals.

4.3.6 In summary, the scheme’s design and landscaping scheme have been devised to balance key on site operational requirements, with maintaining appropriate appearance and amenity, in the context of a heavily industrial area in which very large, utilitarian buildings prevail. The large grounds within which the existing building sits can adequately accommodate the extension(s). Furthermore, the surroundings are characterised by similarly scaled, functional, utilitarian buildings and structures, of comparable size, height and scale. The design is therefore considered appropriate to the site context and character, in accordance with LDP Policies SP12 and DM1.

4.4 Ecology, Trees and Green Infrastructure

Ecology

4.4.1 The site does not fall within any statutory ecological/conservation designation.

4.4.2 A Preliminary Ecological Appraisal has been undertaken on site, identifying that in terms of habitats, the wider site includes semi-improved neutral grassland, marshy grassland, standing water (outside red line boundary), dense scrub, mixed woodland (outside red line boundary), hardstanding and buildings. Overall, the site is considered to have moderate ecological value and potential to support protected and priority species.

- Orchids – located in south of the site. No action required, post-development measures to encourage the habitat are recommended.
- Reptiles - Eastern part of the wider site (outside red line boundary) is considered suitable for reptiles. Further surveys are recommended to ascertain presence or likely absence of reptiles.
- Great crested newt (GCN) – waterbodies within the wider site (outside red line boundary) are considered to indicate potential presence of GCN. Surveys to ascertain presence or likely absence of GCN are recommended.
- Badger – evidence of badger was identified on site, in the northern wooded part of the wider site (outside development area). No development is proposed within 30m of the sett entrances;



therefore, no additional surveys are considered necessary. Precautionary measures are recommended.

- Otter – no evidence identified. The presence of water bodies adjacent to the site boundary indicate possible presence of otters for feeding and commuting, but not residing. Therefore, no additional surveys are necessary. Precautionary measures are recommended.
- Nesting birds – there is historical evidence of nesting birds in the wooded area and scrub north of the site and birds are considered likely to nest in habitats on/near the site. Recommendations include completing demolition or removal of nesting habitats outside of bird nesting season, or ensuring pre-commencement checks by an ecologist for works during the active season; installation of 3no. bird boxes on mature trees.
- Roosting Bats - A Preliminary Roost Assessment (PRA) was undertaken, involving surveys of existing buildings, which confirmed no evidence of roosting bats, nor any potential roost features on site. As such, existing buildings have negligible potential to support roosting bats and no further surveys are necessary.

4.4.3 In accordance with PPW, the site must provide net benefit for biodiversity (NBB). Enhancement measures are therefore proposed as follows:

- Install 2no. bat boxes in the eastern border of the scrub and marshy grassland; and
- Creation of an additional pond, subject to great crested newt survey findings.

4.4.4 The development therefore accords with LDP Policies SP14, NE1, DM1 and SP9 in respect of protecting, conserving and enhancing important habitats and species on and adjoining the site and is capable of delivering NBB in accordance with national policy.

Trees

4.4.5 A tree survey has been undertaken on site, identifying a total 32no. trees and 7no. tree groups, none of which are subject to Tree Preservation Orders (TPOs) and range from very poor to fair condition. No high quality trees (Category A) are present. The quality of trees on site range from moderate quality to unsuitable for retention. These include Category B1 moderate quality (1no. tree T3); Category C low quality (26no. trees and groups); and Category U unsuitable for retention and proposed for removal (12no. trees and groups).

4.4.6 To accommodate the proposals, a total 19no. trees and 7no. tree groups are to be removed, none of which are high quality. An Arboricultural Method Statement is provided with the Arboricultural Report, including measures such as protective fencing and presence of an arboricultural specialist during works, which will ensure no significant adverse effects in respect of trees.

4.4.7 Overall, the belt of trees and woodland to the west, east and north of the site boundaries are retained, in accordance with LPA Pre-App feedback, and no high quality trees will be lost as a result of the development.



There will be no unacceptable harm to trees or woodland and the proposal is therefore considered to accord with Policy NE3.

Landscape and Green Infrastructure

- 4.4.8 The proposal incorporates landscaping measures including retention of existing trees, woodland, vegetation and pond areas on site wherever possible, thereby avoiding the loss of existing or potential important habitats/species in accordance with the Stepwise approach (required by PPW 12). As above, some existing trees are required for removal to accommodate the development, whilst some are required for arboricultural reasons irrespective of the development. Compensatory tree planting therefore forms part of the landscaping scheme, with 33no. replacement new native species trees proposed.
- 4.4.9 New planting is proposed at the new parking area for visual interest, and species selection will include a combination of flowering evergreen and deciduous plants.
- 4.4.10 The drainage strategy includes swales and a rain garden to the north. The rain garden will be planted with shrub species to provide year-round interest.
- 4.4.11 Overall the scheme seeks to retain as much of the existing habitats and biodiversity on site as possible; proposes compensatory tree and vegetation planting to mitigate any loss; and adopts enhancement measures such as bat and bird boxes, and indicative locations for a potential new pond creation (in accordance with the recommendations of the Preliminary Ecological Appraisal), subject to further survey work. It is demonstrated that the proposal complies with LDP Policies SP12, SP14 and SP19; and adopts the Stepwise approach to achieving NBB as per Chapter 6 of PPW 12.
- 4.4.12 Please refer to the supporting Green Infrastructure Statement and Landscape Strategy for further information.

4.5 Flood Risk and Drainage

- 4.5.1 The application is supported by a Flood Risk Note prepared by Jubb, which states that the main risk from fluvial flooding in the area is from the watercourse running along the western boundary of the site. The proposed areas for development are outside the extent of the associated flood zone and the proposal is



therefore considered not at risk for fluvial flooding. For surface water flooding, localised areas within the site are within Zones 1-3 according to the NRW flood map.

- 4.5.2 As for other potential sources of flooding, the Note confirms there is no risk arising from coastal/tidal; sewers; or reservoirs, canals and other artificial sources; or groundwater.
- 4.5.3 To mitigate surface water flood risk, the proposal incorporates sustainable drainage features including rain gardens, permeable paving, and attenuation, to prevent any additional flood risk arising from the development, in accordance with the SuDS Approval Body (SAB) application requirements.
- 4.5.4 Regarding foul water drainage, the site falls within the catchment of River Dee Special Area of Conservation (SAC) and Five Fords Waste water Treatment Works (WwTW). Further to engagement with Dwr Cymru Welsh Water, it is confirmed that the WwTW has a phosphate permit which accords with NRW's regulatory requirements regarding phosphates and there is sufficient capacity within the permit to accommodate the development. The proposal is therefore in accordance with LDP Policy NE6.
- 4.5.5 Full details are provided within the supporting Drainage Strategy. The proposed development has also been subject to a separate SAB Pre-Application, whereas a full SAB application will be submitted in due course to ensure a compliant drainage scheme is delivered on site.

4.6 Transport

- 4.6.1 This application is supported by a Transport Assessment (TA) and Travel Plan (TP).
- 4.6.2 The proposed access works include the introduction of a second access to the site, dedicated to HGVs. As requested by the LPA at Pre-Application Stage, the submission package includes large HGV tracking plans, which demonstrate safe entry and egress from the site is achievable.
- 4.6.3 Regarding car parking, the LPA adopts a maximum car parking provision for industrial use. Based on proposed industrial use, these standards result in a requirement for a maximum 160 spaces. The development proposes 53no. spaces in total, which is adequate on the basis that not all staff will be on-site at any one time due to shift patterns. The provision also makes an allowance for contractor parking. The proposals would not result in any overspill nor on-street parking impact outside of the site boundary. Parking provision includes disabled



spaces, some of which will provide EV charging facilities. A policy compliant amount of cycle parking is also provided.

- 4.6.4 The TA estimates that the development will result in 13no. additional two-way vehicle movements in the morning and evening peak hours, which is not considered to result in significant impacts on the local highway network.
- 4.6.5 The TP includes measures to ensure future staff and users of the site are encouraged to use sustainable modes of transport, including the appointment of a Travel Plan Co-ordinator.
- 4.6.6 Please refer to the supporting TP and TA for further information. The scheme demonstrates compliance with LDP Policies SP11, T1 and T2.

4.7 Economic Benefits

- 4.7.1 The Norish site is currently an existing, important local employer. However, the cold food storage facility contains outdated technology and is not operating at its maximum efficiency. The proposed development therefore seeks to improve the efficiency and safety of existing operations at the site and for the business as a whole.
- 4.7.2 The proposed development aims to deliver a modern and high-quality facility, representing positive and substantial investment into the site by its owners, in accordance with the broad aspirations to improve the quality of employment sites within Wrexham Industrial Estate (LDP Policy SP8 and SP9). The large extension area will accommodate a new automated racking cold store, designed to maximise the potential of the site for storage capacity. The design of the scheme also seeks to incorporate an element of adaptability, whereby the future needs of the business can be accommodated with flexibility.
- 4.7.3 The proposed development will result in the employment of 5no. new members of staff and 2no. new contractors per day. The scheme will increase the number of available, permanent jobs within the industrial estate, towards the job creation targets presented in LDP Policy 8.
- 4.7.4 Given the site is located within an established industrial estate, which is one of the largest of its kind in Europe, combined with the clear policy drivers to improve the quality of employment sites at this location, the economic and employment benefits of the scheme are material considerations that weigh strongly in favour of the proposal.

4.8 Ground Contamination

- 4.8.1 The application is supported by a Phase 1 and Phase 2 Ground Investigation (GI) Report. The Geo-environmental assessment confirms no contamination exceedances detected in soil samples; no asbestos;



very low gas risk; and no risk to controlled waters. Overall contamination risk at the site is deemed to be low, as such no specific mitigation measures are required.

- 4.8.2 There are no ground contamination-related reasons to prohibit the proposed development. Full details are provided within the supporting GI Report.

4.9 Energy

- 4.9.1 The proposed development seeks to improve energy efficiency of the business and once operational, will have a lower energy consumption when compared to the energy usage of the existing facility.
- 4.9.2 The scheme has been designed to be high quality and energy efficient, by incorporating thermally efficient wall and roof cladding; high efficiency lighting to the car park and service yards; building fabric will be designed to prevent temperature loss; rainwater harvesting; installation of solar panels to the roof; use of sustainable materials to ensure the extensions are built to last; responsible sourcing of materials; and waste management and recycling measures. The proposal is therefore in accordance with LDP Policy SP18 and the renewable energy and low carbon technology measures proposed are in accordance with LDP Policy RE1.



5.0 Summary and Conclusions

5.1.1 This Planning Statement has been prepared by CarneySweeney in support of a full planning application for the extension of existing cold storage facility building, access and car parking alterations, landscaping and all associated works, at Norish Cold Storage Facility within Wrexham Industrial Estate.

5.1.2 In light of the above considerations, we make the following conclusions:

- The site falls within the settlement boundary for Wrexham Industrial Estate, where the principle of industrial / employment development is supported.
- The development will vastly improve the operational efficiency of the building, introducing new employment opportunities and a high quality modern storage facility, which represents significant investment into the site and wider industrial estate.
- The design, scale and appearance of the proposal is consistent with the industrial context of the site and its surroundings and is informed by operational requirements of the business.
- The additional trip generation made by the development will not significantly impact the highway network. The proposal introduces a new access into the site, dedicated for HGV traffic only, retaining the original existing access for staff and visitors, improving the legibility and safety of the site.
- Ecological surveys find the site is not used for bat roosting. Ecological mitigation and enhancement is proposed as part of the redevelopment to deliver net benefit for biodiversity. The site will not unacceptably encroach upon the Wrexham Industrial Estate Strategic Ecological Network.
- A comprehensive landscape scheme and green infrastructure statement supports the proposal.
- Energy efficiency is incorporated into the fabric of the building, through use of sustainable materials, installation of solar panels, and efficient waste management processes.
- A Drainage Strategy Plan demonstrates the incorporation of sustainable drainage design. This will be subject to separate SAB approval.

5.1.3 The applicant is committed to delivering a high quality, sustainably designed development which will deliver economic investment to Wrexham Industrial Estate. The application proposal has been assessed against the relevant national and local planning policy framework. In light of the above considerations, it has been demonstrated the redevelopment proposals can comply with all policy requirements, subject to appropriate planning conditions. The overall balance of considerations which weigh firmly in favour of approving the proposed redevelopment.

