



COMBINED PLANNING STATEMENT

In support of two planning applications for warehouse extensions for F Lloyd
(Penley) Ltd – “Extension I” and “Extension X”

Bridge Road, Wrexham Industrial Estate, LL13 9PS

MAY 2023

DOCUMENT REFERENCE: FI013 002 v2



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1 SUMMARY

- 1.1 This Combined Planning Statement has been prepared on behalf F Lloyd (Penley) Ltd in support of its parallel proposals to erect two warehouse extensions at its premises at Bridge Road, Wrexham Industrial Estate, known as “Extension I” and “Extension X.”
- 1.2 F Lloyd (Penley) Ltd is a long established warehousing and transport company based at Wrexham Industrial Estate. It provides high quality industrial warehousing, transport and logistics solutions for a range of customers with a significant proportion of its business supporting the drinks industry.
- 1.3 The success of the business means that it has need to expand its warehouse storage space for the pallets of drinks containers to meet existing customer demand. In addition it proposed to install canopies over the loading area to improve its facilities and weather proofing loading areas.
- 1.4 Two extensions are proposed, referred to Extension X and Extension I which are identified on the submitted drawings.
- 1.5 No change to access or internal circulation is required save for minor service yard changes in the immediate vicinity of the extensions.
- 1.6 The proposals will not lead to any change in staffing levels at the site as the warehouses are used solely for storage purposes to receive and redistribute the palletized stock. This includes no change to staff facilities and neither extension will require a connection to foul drainage.



2 INTRODUCTION

2.1 This Statement is submitted alongside a range of draft drawings, documents and technical that comprise the following items:

- Covering letter (combined)
- Planning application forms (for each Extension).
- Certificates and notices (for each Extension)
- Drawing pack (by DMWR Architects) (for each Extension)
- Design & Access Statement (by DMWR Architects) (for each Extension)
- Planning Statement (by Plan Red) – this document (combined)
- Transport Report (by Prime Transportation) (combined)
- Preliminary Ecological Appraisal by UES (combined)
- Flood Consequence Assessment (by LK Consult / Shape Engineering) (combined)
- Drainage Strategy & Maintenance Document (by Shape Engineering) (combined)
- Phase 1 Desk Study (by LK Consult / Shape Engineering) (combined)
- Operator Statement provided by F Lloyd (Penley) Ltd (combined)
- PAC Report (combined)

3 PROPOSED DEVELOPMENT

- 3.1 The site area for the two extensions is illustrated in Figures 2 and 3 overleaf, with a site wide plan placing the extended warehouses in context provided as Figure 1 below.

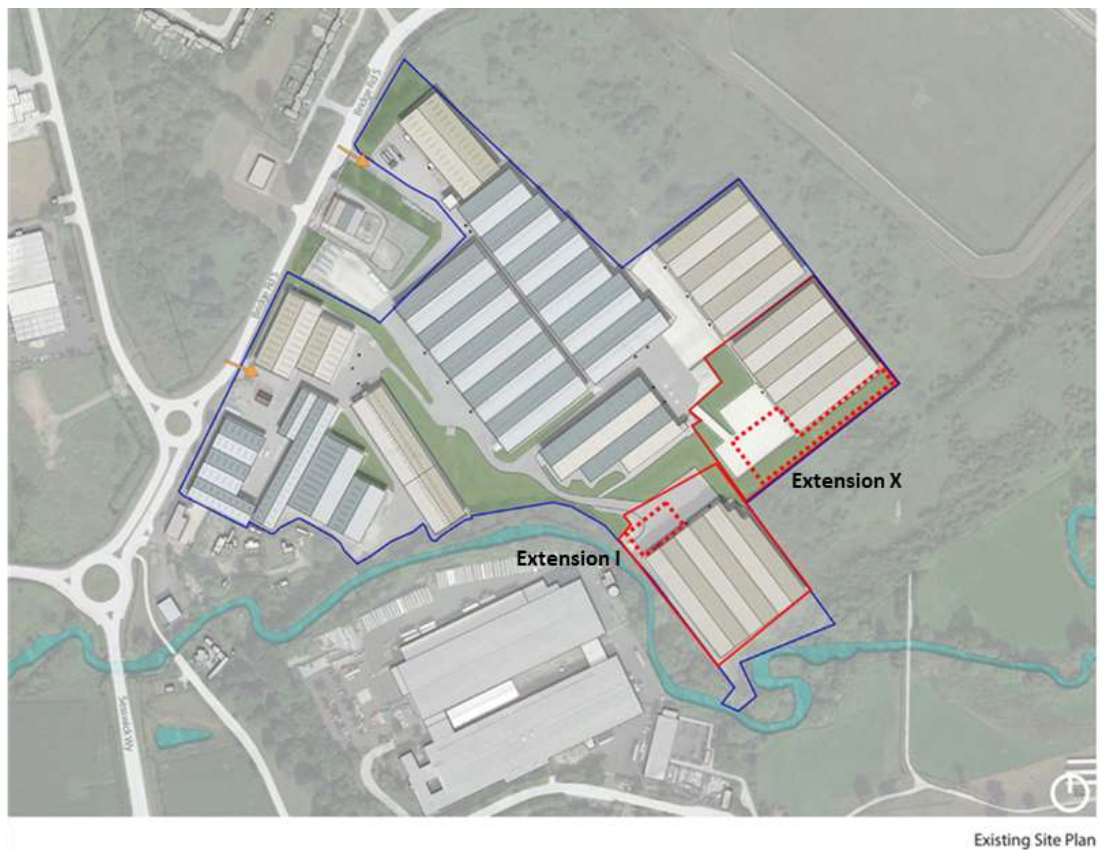


Figure 1: F Lloyd (Penley) Site (blue line) with positions of two warehouse extensions (red line)

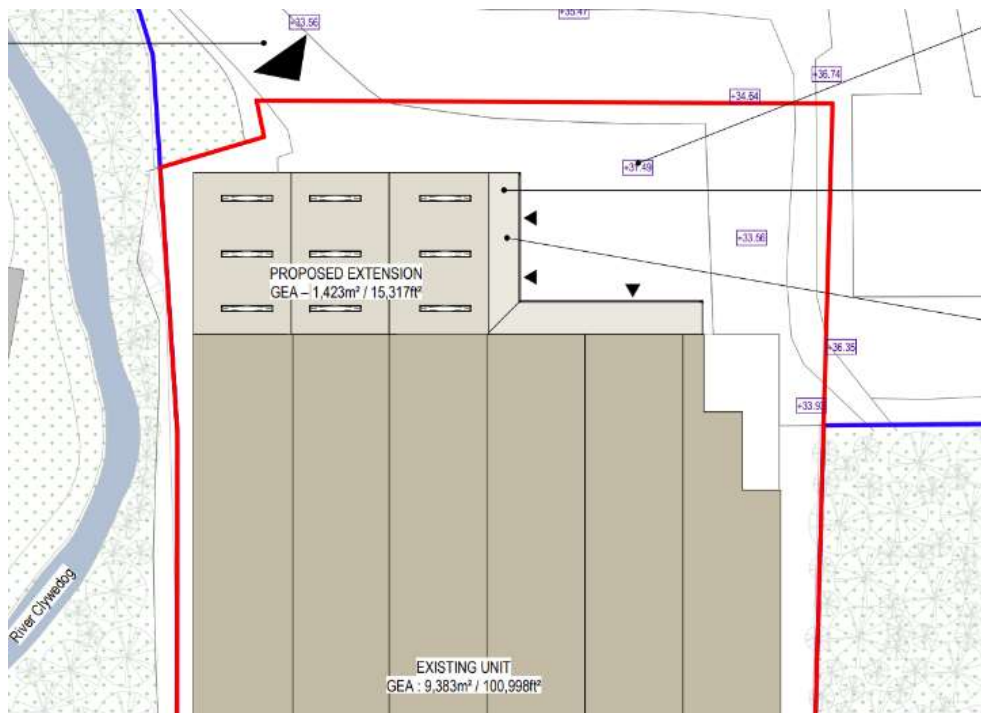


Figure 2: Extension I – Proposed Site Plan (extract drawing 3850-DMWR-DR-A-0100)

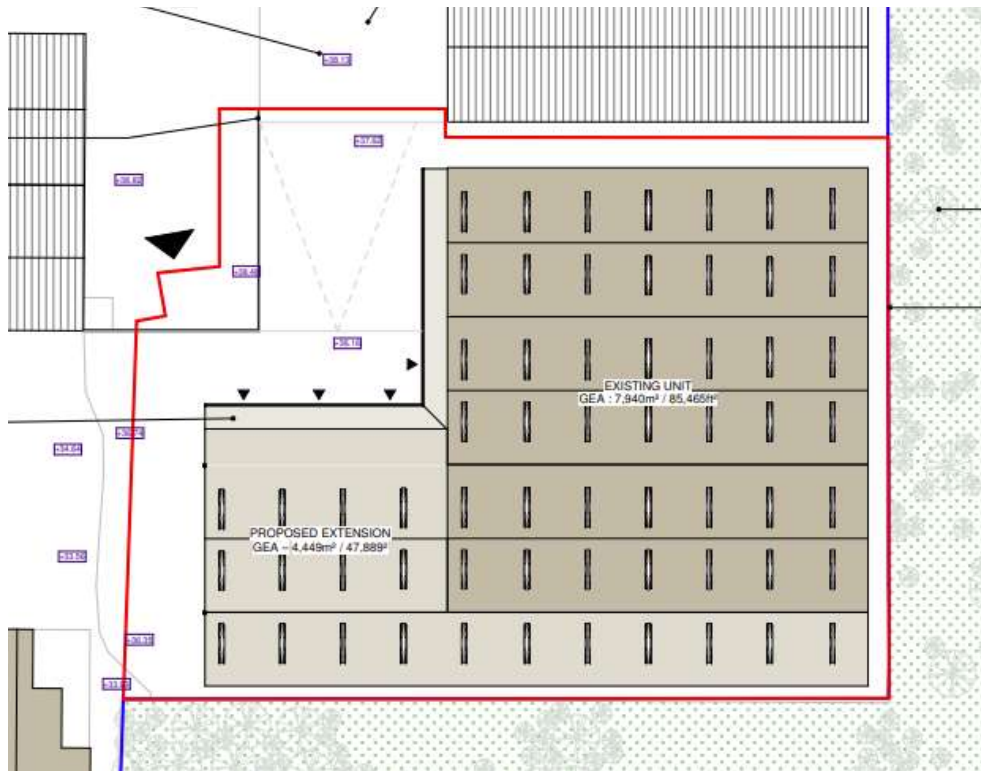


Figure 3: Extension X – Proposed Site Plan (extract drawing 3850-DMWR-DR-A-0110-A)



Extension I

- 3.2 The location of Extension I is on the lower area of the site to the front (west) of existing an existing warehouse. The extension is for 1,116 sqm floorspace GEA. This will be provided in steel framed building with pitch roof tied into the existing building.
- 3.3 Vehicle entrance to the warehouse is taken from an existing internal ramp from the west terminating in a turning circle. Two existing access are retained and one new access provided within the extension as illustrated.
- 3.4 The use of the warehouse will remain Use Class B8 and will be for the storage of drinks containers as shown in the illustrations (Figure 4). There will be no support or staff facilities created in the extension.

Extension X

- 3.5 The location of Extension X is in the upper area of the site to its northeastern corner of an existing warehouse. The extension is for 3,930 sqm floorspace GEA. This will be provided in steel framed building with pitch roof tied into the existing building. The building extends the existing warehouse to side and front.
- 3.6 Vehicular access to the extended warehouse will be taken from a remodelled ramp to accommodate existing changes in levels, replacing the existing ramp. Loading bays will be relocated into the extension to improve the efficiency of the use of the extended internal layout.
- 3.7 The use of the warehouse will remain Use Class B8 and will be for the storage of drinks containers as shown in the illustrations (Figure 4). There will be no support or staff facilities created in the extension.

Common to both extensions

- 3.8 Appearance will match the existing warehouses with profiled sheet wall in green finish and profiled sheet roof in three sections. Further information is provided in the Design & Access Statement and Proposed Elevations.
- 3.9 Although the proposal will create additional floorspace at the site the proposal will not lead to a net increase in employment across the site given the nature of the business intensively uses the warehouses for storage and redistribution of goods, as part formed drinks cans (cylinders).

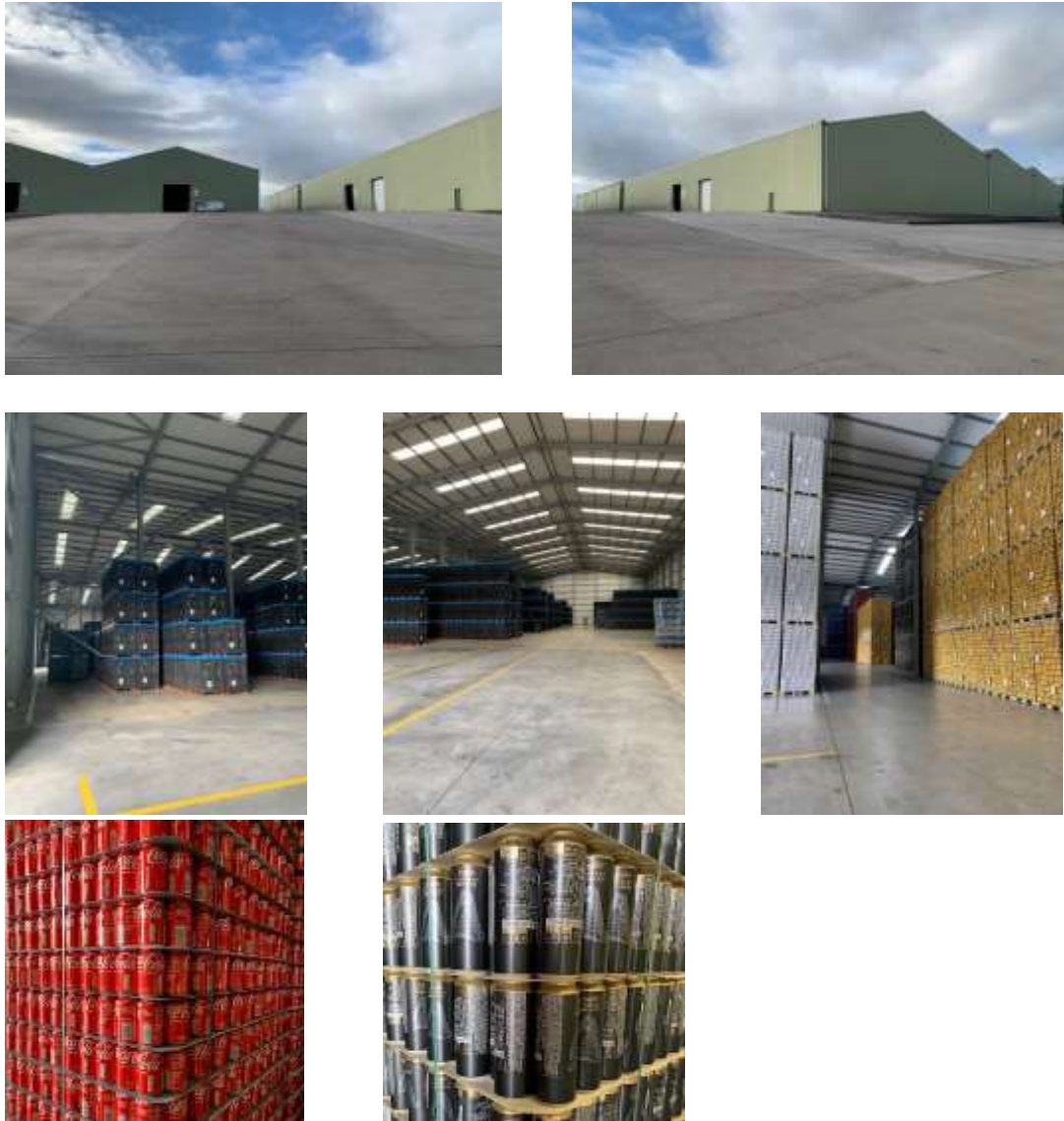


Figure 4: Images of typical warehouses at the F Lloyd (Penley) site external and internal, and pallet storage of empty drinks containers.

4 RELEVANT PLANNING POLICY

- 4.1 The *Planning (Wales) Act 2015*, the *Well-being of Future Generations (Wales) Act 2015* and other key legislation and resultant duties such as the Socio-economic Duty confirm that a well-functioning planning system is fundamental for sustainable development and achieving sustainable places.
- 4.2 Up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making. Planning applications must be determined in accordance with the adopted plan unless material considerations indicate otherwise.
- 4.3 Material considerations can cover anything to do with the purposes of planning and include all typical planning, development, land use and related factors that have a bearing on whether a planning application should be granted.
- 4.4 It should be noted that national planning policy for Wales has the status of a material consideration in planning decisions, although it can be given greater weight where there is the absence of a comprehensive or fully up to date development plan.

National planning policy

- 4.5 *Planning Policy Wales*, 11th Edition published in February 2021, (“PPW11”), sets out the land use planning policies of the Welsh Government. It is supplemented by a series of *Technical Advice Notes* (“TANs”), Welsh Government Circulars, and policy clarification letters.

Local planning policy

Commentary

- 4.6 At time of PAC consultation there was expectation that the replacement LDP would have been adopted in late April 2023 to replace the UDP. This did not happen and as such the UDP remains in place as the statutory development plan, but on advice of officers we understand that the emerging LDP will be given considerable weight in determining applications. At application in May 2023 timescale for resolution of the LDP situation is unclear, but for purpose of this statement we set out the adopted and emerging plan positions, which in truth, make little difference in the planning approach for these two applications.



Wrexham Unitary Development Plan

4.7 The Council adopted the Wrexham Unitary Development Plan (“UDP”) 1996 - 2011 in February 2005. The plan covers the administrative area of Wrexham County Borough. Policies considered of most relevant to the proposals are as follows;

- PS1 Settlement limits
- PS2 Environmental Impacts
- PS3 Make use of brownfield land
- PS4 Maintain existing settlement patterns, character and transport network integration
- E1 Wrexham Industrial Estate
- GDP1 Development Objectives
- EC6 Biodiversity Conservation
- EC13 Surface water run-off

Wrexham Local Development Plan

4.8 The Wrexham Local Development Plan (“LDP”) will replace the UDP. The LDP has completed examination and received the binding Inspector’s Report and recommended changes. It was intended to be adopted by Council in April 2023 but the motion was not carried.

4.9 For purpose of this Planning Statement we take the approach of guidance from officers to give weight to the emerging policies in assessment of the application as a material consideration.

4.10 The following policies are considered of relevance to the proposals:

- SP2 Location of new development
- SP10 Wrexham Industrial Estate; including WIE Strategic Ecological Network
- SP12 Transport and accessibility
- SP13 Design principles
- SP15 Natural environment



- EM1 Protection of Existing Employment Land
- T1 Managing Transport Impacts
- DM1 Development Management Considerations

Phosphates issue

- 4.11 The phosphates issue relates to guidance issued on phosphates and impacts on the sensitivities of the River Dee and Bala Lake Special Area of Conservation (“SAC”). NRW standing advice was updated in 2022¹. The central issue being whether a new development will lead to increased levels of phosphate within the SAC or not.
- 4.12 During early 2023 the Welsh Government, NRW, Welsh Water and local authorities, including Wrexham, have advanced discussion on approach to treatment of phosphates to enable development to come forward. This is a live and changing matter and will be handled through the application process.
- 4.13 It is our position at the outset that the nature of the two extensions for warehouse storage only, for an existing operator and providing no additional foul connection or facilities. The proposal will not lead to any additional employment at the site. Therefore, we say it is possible to conclude that the development will lead to **no net increase in phosphate** emissions from the site.

¹ Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation, Natural Resources Wales Version 3 Final July 2022

5 PLANNING CASE

Principle of development

- 5.1 This Combined Planning Statement supports two separate planning applications for extensions, but the principle of development applies unchanged for both applications.
- 5.2 Both sites are previously developed land located within the defined urban area of the Wrexham Industrial Estate (“WIE”) that is in use for Class B8 storage and distribution. The business operations are arranged over a series of large warehouses. The business is a long-standing and very successful, serving the drinks industry (national and international brands) as repository for preformed drinks containers. No industrial processes happen on site with the site used exclusively to receive and re-distribute containers in pre-formed pallet loads (see earlier Figure 4 for illustration of typical warehouse storage).
- 5.3 Both extensions are proposed solely for the purpose of providing additional storage capacity to enable the continuing success of the company operations to meet rising demand.
- 5.4 As a matter of principle both sites and the proposed use are located within the defined Wrexham Industrial Estate boundaries and accords with the adopted UDP policies PS1 (settlement limits), PS3 (making use of brownfield land), PS4 (maintaining existing settlement patterns) and E1 (Wrexham Industrial Estate as an employment location). It also accords with LDP policies SP2 (location of development), SP10 (Wrexham Industrial Estate) and EM1 (protecting employment land).

Scale, siting, appearance and layout

- 5.5 Both extension applications follow the same design approach as set out in the submitted drawings and Design and Access Statement which illustrates the existing and proposed extended warehouse buildings.
- 5.6 Looking at each site individually the following points are highlighted.

Extension I

- 5.7 Extension I is formed to the front of the existing warehouse and will provide 1,116 sqm of additional floorspace. One new loading bay will be included into the warehouse, supplemented for two retained loading bays on the existing frontage. Operationally



trailers are reversed into the warehouses for loading / unloading and not in the open yard areas. As an upgrade on the present warehouse design a short, high canopy as illustrated is proposed over the loading bay entrances to reduce ingress of rain when in use.

- 5.8 The extension arrangement and loading bay doors are maximised for internal efficiency of operation for receiving and dispatching palletted goods, to reduce the number of cross warehouse movements internally.
- 5.9 The service yard and access ramp are unchanged by the extension and the new loading bay is accessible from the same turning circle that serves the existing warehouse bays.

Extension X

- 5.10 The extension is to the side and front (predominantly) of the existing warehouse, providing 3,930 sqm of additional floorspace. The scale, siting and appearance will match the existing warehouse. The layout will providing extended floorspace internally and will move the loading area into three bays within the extension, with the existing warehouse bays closed. This means mean the internal area can be more efficiently utilised, reducing cross warehouse movements internally and improving safety and manoeuvring. The relocated bays to the new spur to front allows internal consolidation of the main warehouse span into a more efficient storage layout.
- 5.11 Extension X will require remodelling of the existing access ramp and service yard area as part of the works.
- 5.12 Overall the siting, scale, appearance and layout of the proposed warehouse extensions will deliver an appropriate, simple warehouse building that are fit for purpose to support the continued successful business operated by F Lloyd (Penley) Ltd. The development accords with the design principles supported primarily set through UDP policy GDP1 and LDP policy SP13.

Access and transport

- 5.13 Prime Transportation has prepared a Transport Statement to accompany both applications in accordance with PPW and TAN18: transport advice, as well as relevant local policy. Conclusion made in the TS, paras.7.2.1 & 7.2.2 state:

7.2.1 This report and the associated appendices conclude that that there are no highway safety concerns that would preclude the delivery of the development proposals, the site is accessible by a

variety of modes of transport, an appropriate level of car and cycle parking will be provided, and that the development would have a negligible impact on the operation of the surrounding highway network.

7.2.2 As the proposal complies with local and national planning policy and guidance with respect to sustainable accessibility, safety and impact on the highway network, there are no highways or transportation related reasons why planning permission should not be granted. Should the highway authority have any concerns, we are happy to consult further with them.

- 5.14 The proposals therefore accord with national policy objectives and principles to promote safe access and sustainable transport choices and conforms with objectives of UDP policy GDP1 and LDP policies SP12 and T1.

Ecology

- 5.15 A Preliminary Ecological Assessment (PEA) prepared by UES supports both applications, with surveys of both extension locations. Before returning to the detail of the PEA below, the conclusion of the PEA records for both locations:

Extension 1 [now referred to as Extension X] has an area of approximately 1.70ha whilst Extension 2 [Extension I] has an area of approximately 1.47ha. The habitats on both sites are similar, with hardstanding, a building and amenity grassland dominating the majority of both sites. However, areas of inert spoil and species-poor semi-improved grassland are also present within the application boundaries.

The impacts of both applications are considered and discussed in section 4, and the following ecological receptors have been identified on or adjacent to site: amphibians and reptiles, bats, species-rich grassland, invasive species, watercourse, hedgehogs, and water vole and otter. Provided these issues are addressed in accordance with the recommendations detailed in this report, the development may proceed without adversely impacting the aforementioned ecological receptors.

The development also presents an opportunity to enhance the habitats available to wildlife on site. The provisioning of bat and bird nest boxes on site will provide improved roosting and nesting opportunities into the long-term future of the site.

- 5.16 Returning to the detail in the PEA, the findings and recommendations in Section 4 are:
- 4.1.1 Designated Sites – development is unlikely to have any direct or indirect impact.

- 4.1.2 Species Rich Grassland (TN6) – development does not directly affect and no mitigation measures are proposed.
- 4.1.3 Watercourses – relates to Extension I only². No direct impacts are expected but mitigation to prevent potential deposition of materials during construction is recommended. This can be achieved through relevant planning condition and Construction Environmental Management Plan (CEMP) or similar.
- 4.2.1 Amphibians and reptiles – sites for both extensions noted as unsuitable to support GCN, closest record for GCN 60m from Extension X boundary³. Because of potential construction impacts a GCN impact assessment is required to assess suitability of ponds within 250m of the Extension X site boundary between 15th March and 15th June. Whether and what mitigation measures might be required will be informed by the surveys.

For Extension I a RAMs approach is proposed given the extremely unlikely event of GCNs being affected at this site as a precautionary measure.

Both matters can be controlled through suitable planning condition(s) and in the matter of Extension X it is expected to be subject to a relevant licence following grant of planning permission.

- 4.2.2 Bats – Buildings on site are considered to provide negligible suitability to support roosting bats and site very low-quality foraging opportunities. Recommendation to control light spillage (construction and operational) with opportunities for enhancement to spoil mounds to create wildflower grassland and installation of 4 bat boxes (different types). This can be secured by condition.
- 4.2.3 Invasive species – none identified on site to require mitigation.
- 4.2.4 Hedgehogs – numerous records exist with droppings recorded on site using amenity grassland. RAMs proposed for construction to avoid direct harm, injury and or death to individuals, with operational impacts mitigated by providing for accessibility; “hedgehog highways” – Suitable planning condition(s) for RAMs and operational mitigation can be applied.
- 4.2.5 Otter and water vole – records are noted for the River Clywedog adjacent to Extension I. Mitigation proposal for RAMs during construction including no night

² PEA refers to Extension I as Extension 2 prior to renaming by client.

³ PEA refers to Extension X as Extension 1 prior to renaming by client.



working or external lighting along river bank; safe storage of chemicals and infilling trenches to prevent animals becoming trapped. No operational impacts are envisaged. A relevant condition can secure RAMs for construction within a CEMP, or similar.

- 5.17 In PAC comments were received from NRW on the ecology findings and above PEA recommendations. Most matters and recommendations were agreed with NRW noting areas for further survey and information, most of which also aligned with the recommendations.
- 5.18 Due to seasonality and timing of ecology surveys we will present the requested reports following submission. The follow-on surveys do differ slightly between the two extensions, with Extension I being beside the river and Extension X being beside existing habitat for great crested newts. Follow-on surveys shall be:
- Extension I – otter and water voles – to meet NRW concerns we reconfirm no external lighting to the side of the extension (and existing warehouse) shall be installed, (there is none present currently either), which can be secured by condition; and UES Ltd will provide additional commentary on otter and water voles to effect the development will not lead to any detriment to the maintenance of the species population at a favourable conservation status in its natural range.
 - Extension X – UES Ltd has been instructed to carry out the follow-up surveys requested by NRW to inform a conservation plan and long-term management and monitoring relating to great crested newts. A licence will be required following grant of permission on Extension X.
- 5.19 At this interim point we therefore feel confident that subject to completion of relevant GCN surveys to identify any relevant mitigation measures, and the otter and water vole information, that all other identified matters can be positively controlled through reasonable avoidance measures (RAMs), secured by planning condition(s). This can also secure recommended mitigation measures including bat box installation, control on external lighting and hedgehog highways. This will accord with legislative requirements for the protection of wildlife as well as national and local planning policies and guidance previously referred to. On that basis we make an interim conclusion that the proposals shall accord with national planning policy and guidance, and relevant UDP policies including policies PS2, GDP1 and EC6, and also LDP policy SP15.

Drainage and related matters

- 5.20 A Flood Consequence Assessment and Drainage Strategy & Maintenance Document prepared by Shape Consulting Engineers support the application. The FCA (4.3) summaries the flood risk to range from negligible, to very low and low against seven assessed factors. The site is partly within Flood Zones B and C2, the majority of the site is Flood Zone A. Mitigation measures are to ensure finished floor levels match existing levels, there is already a safe, dry access via Bridge Road, and a solid floor construction is recommended.
- 5.21 The Drainage Strategy notes there is no foul connection to the warehouse and location of Extension X, and a small outbuilding with foul connection in the location Extension I will be abandoned. No new foul connection will be made for either extension. Surface water drainage is proposed at Extension X via an attenuation tank as specified in drawings, in the location of Extension I no existing attenuation features are noted or recommended.
- 5.22 The Assessment confirms that with the resilience measures undertaken that the consequences of flooding are acceptable and the development will be accordance with the requirements of TAN15. The Assessment demonstrates the proposed development will be operated with minimal risk from flooding, will not lead to increased flood risk elsewhere and is compliant with TAN15 requirements.
- 5.23 Through PAC we note that NRW raised no objection on matters of flood risk to the proposals. Extension I will require liaison on emergency plans because of proximity to the River Clywedog. Welsh Water commented in both extensions to confirm proximity to the rising main easement. It is the developer's view neither extension infringes the easement. A SAB application will be separately made for surface water drainage.
- 5.24 The approach accords with the drainage hierarchy and best practice in accordance with national guidance and local UDP policies GDP1 and EC13 and LDP policy DM1.

Phosphates

- 5.25 NRW advice updated in July 2022 directs that local authorities should consider on a case by case basis whether a development is likely to have a significant effect on a river SAC in relation to phosphorus inputs.



- 5.26 This is a non-residential development proposal two warehouse extensions which will not lead to any change in existing staffing levels at the F Lloyd (Penley) Ltd site. No new welfare facilities will be provided within the extensions, which are purely storage facilities. Indeed, the existing foul connection to an outbuilding in the vicinity of Extension I will be abandoned.
- 5.27 For these reasons it is considered that the development will not lead to a net increase in phosphorus concentration of wastewater from the wider operational site. In reaching this conclusion it is relevant to consider that this is a local company which employs people within the local area, and it can be reasonably expected staff within the local population to remain the same and therefore will not draw more people to live in the River Dee SAC area.
- 5.28 In acknowledging this is a changing regulatory picture and from other discussions with officers we will maintain dialogue on this matter through the application process.

Other matters

Ground conditions

- 5.29 A Phase 1 Preliminary Risk Assessment prepared by LK Consulting supports the applications. Its recommendations (7.4) consider there is sufficient information available on potential contaminative status of the site to allow conditional planning approval (standard condition). It provides recommendations on Phase 2 report (intrusive investigation) to be agreed with the local authority under condition. Subject to imposition of a standard planning condition to approve and implement the remediation strategy it is considered that there is no elevated risk arising from the development at the site and its proposed end use for commercial purposes.



6 CONCLUSIONS

- 6.1 The development proposals will support the continued investment of F Lloyd (Penley) Ltd into its business and premises at Wrexham Industrial Estate, a long established and successful storage and distribution business.
- 6.2 In land use planning terms the site is previously developed land, within an area designated for employment uses including Class B8 warehouse uses. The development will see the erection of two extensions to two separate warehouses, Extensions I and X.
- 6.3 Scale, siting, appearance and layout are all appropriate to what are two extensions to existing warehouses within a larger premises / site.
- 6.4 There will be no material change to matters of transportation and trip generation as set out in the Transport Statement. Service access will be maintained with minor internal alteration to serve proposed Extension X.
- 6.5 Both extension sites have limited potential to effect matters of ecological importance. Matters of potential impact to GCN population will be subject to follow-on surveys between 15th March and 15th June to set out what impacts might be and relevant mitigation measures to be secured through condition and any relevant licence. Mitigation measures in construction and operation, or opportunities for enhancement, are identified related to bats, hedgehogs, otter and water vole and can be secured through planning conditions.
- 6.6 Matters of ground conditions and any requirement for remediation to build the extensions can be handled through standard planning condition.
- 6.7 Surface water will be attenuated on site in accordance with the drainage hierarchy and the flood risk is identified between negligible to low, mainly very low.
- 6.8 Matters of phosphates do not arise by reason the units are for storage use only, provide no welfare facilities, and will not lead to any net increase in employment. The employment use is a permissible exception under NRW guidance.
- 6.9 This is a sustainable development that will support economic and social objectives to support a successful local business, the local economy and community, and it will not



lead to adverse impacts to matters of environmental concern. Accordingly planning permission should be granted without delay.