

Based on the guidelines for Town and Country Planning (Development Management Procedure) (Wales) Order 2012, *TAN12: Design Note*.

Ipsen Biopharm Ltd.

Proposed New Manufacturing Facility, East Site, Wrexham Industrial Estate



Site Address

Ipsen Biopharm Ltd
Ash Road North
Wrexham Industrial Estate
Wrexham, LL13 9JT

Proposed Development

Construction of a new manufacturing facility along with associated car parking and landscaping

Date Prepared

May 2023

Applicant Details

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1.0 SUMMARY OF THE PROPOSAL

Ipsen is a global biopharmaceutical group dedicated to improving lives through innovative medicines in Oncology, Neuroscience and Rare Diseases.

Ipsen BioPharm Ltd (IBL) Wrexham, which is part of the Ipsen Group, currently employs approximately 450 people and is a strategic site for Ipsen in manufacturing and developing Biological Neurotoxins.

The products manufactured and developed at the Wrexham site, provide unique therapeutic indications for severe diseases like spasticity, cervical dystonia in adults and children.

The masterplan for the Wrexham site has previously focused on the main production site located on the west side of Ash Road North. Ipsen also owns the site on the opposite side of the road, and the masterplan has now been recently extended to include this site. Ipsen have identified the need to increase manufacturing capacity to meet demand and have initiated this new facility to meet this requirement. It also keeps Ipsen at the cutting edge of pharmaceutical technology, building a long-term future in Wrexham.

This Design and Access Statement will support the **Full** Planning Application by Lovelock Mitchell Architects on behalf of Ipsen Biopharm Ltd for a new manufacturing facility.

2.0 THE BRIEF AND VISION

This planning application is part of an ongoing programme of replacement, improvement and new build works on the Ipsen Wrexham sites

The new building will comprise of a process floor at first floor level (Level 02) and supported by a large plant room at ground and second floor level. The new facility will be located on the site on the east side of Ash Road North, directly opposite Ipsen's current main campus. The site, owned by Ipsen, was previously occupied by a large warehouse and despatch building which was demolished in 2019.



The specific goals set out by Ipsen are:

- Increased production capacity and operating cost reduction.
- The facility will need to be fully operational as soon as is practicably possible.
- Create high quality facilities that improve working environments with modern equipment and processes which will assist in developing Ipsen's business objectives and allow Ipsen to attract talent. Ipsen has expressed the importance of technology and high specification equipment in the new facility.
- Build the optimal facility for the manufacturing process.

3.0 SITE AND CONTEXT ANALYSIS

The site lies approximately 4 miles east of Wrexham town centre and lies within the jurisdiction of Wrexham County Borough Council.

Wrexham Industrial Estate covers approximately 550 hectares and in geographical terms is one of the largest industrial estates in Europe, it accommodates around 300 businesses, employing 7000 staff, and creates a livelihood for Wrexham and North East Wales. In addition to these businesses, there are ninety Local Authority houses and approximately one hundred private dwellings within the confines of the estate together with a number of retail outlets.

The application site is operated by Ipsen Biopharm Ltd and is located within the red line boundary (Figure 1). It is approximately 1.56 hectares, within the overall site (in blue) of 2.45 hectares. Topographically, it is relatively flat.

This site was previously occupied by a large warehouse with associated parking but is currently used as an overflow car-park for Ipsen staff with the original building footprint not used.

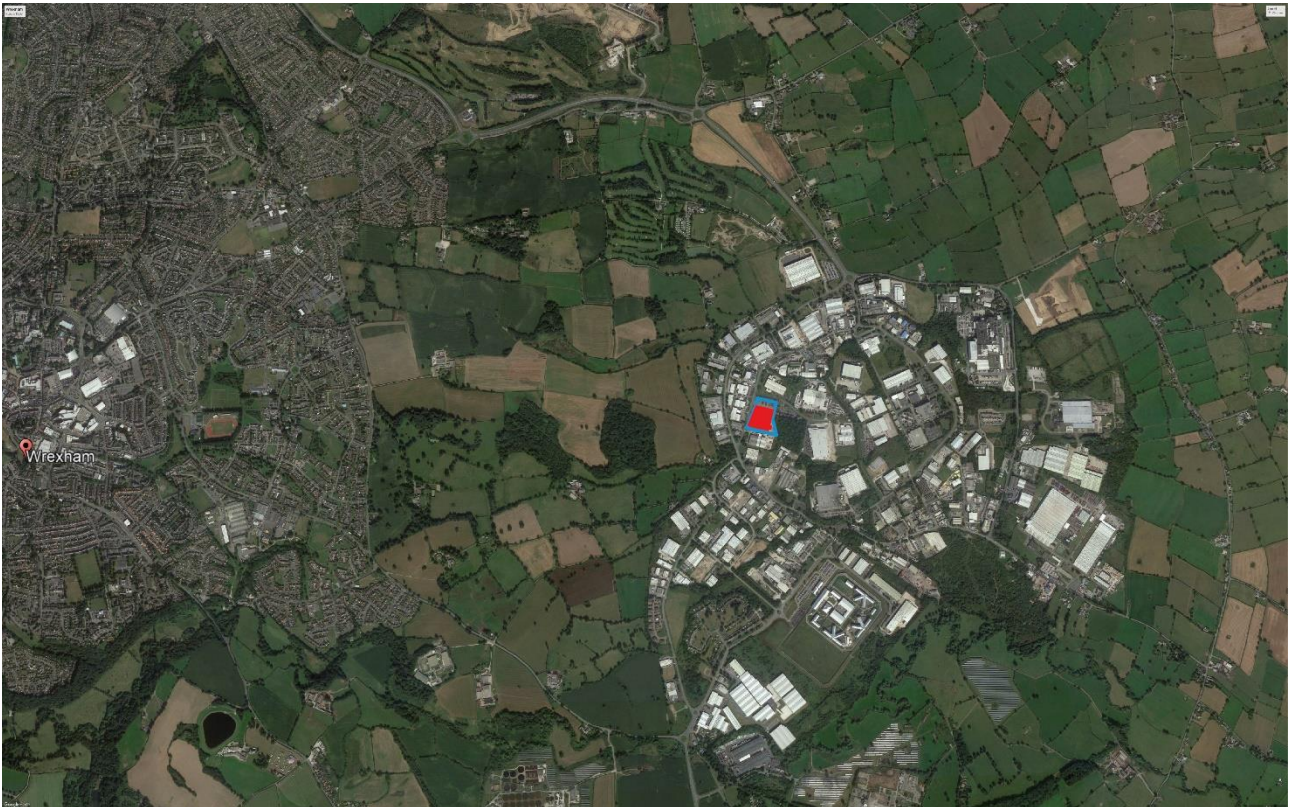


Figure 1 - Context of location - application site highlighted in red.

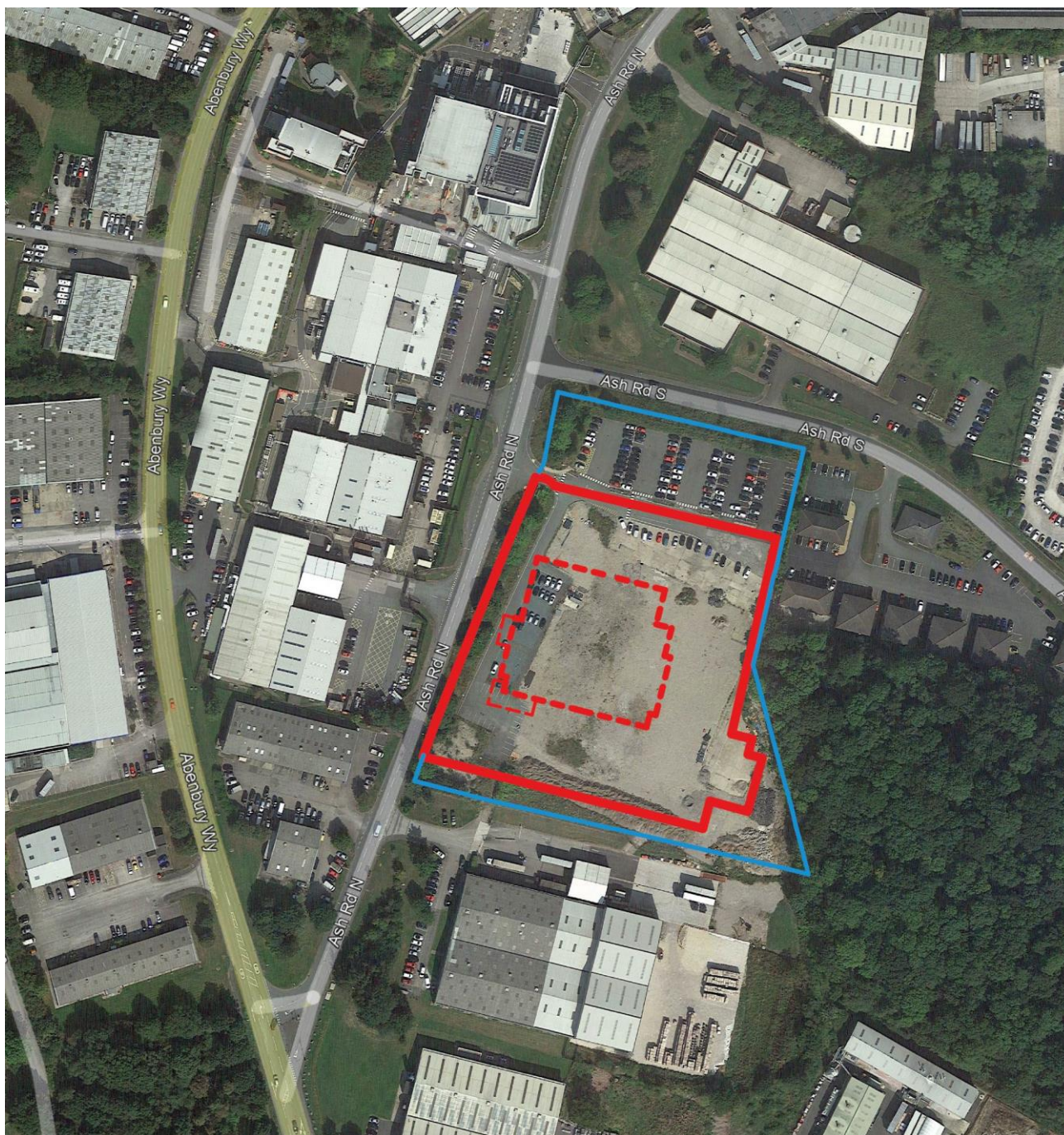


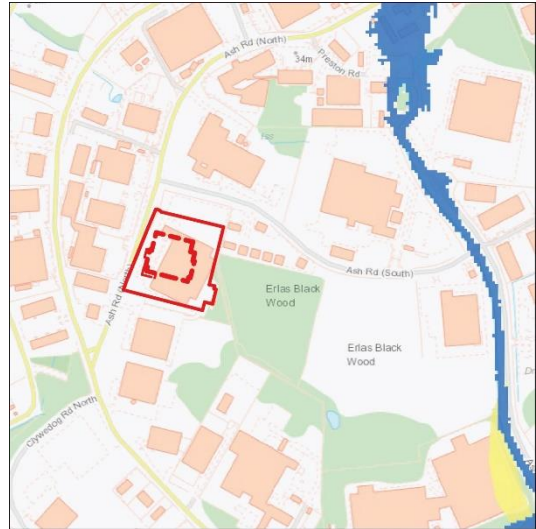
Figure 2 - Aerial View of site –Application boundary in red with location of new building in red, dashed.

3.1 FLOOD RISK

The map below obtained from Natural resources Wales (Feb 2023), indicates the site is outside of the flood plain and that there is very low risk from flooding (less than 1 in 1000 each year) chance of occurring each year from rivers or from the sea. The site has been indicated with a red outline on the map below.

There are small areas at risk of surface water flooding which are related to the existing basin at the discharge location at landscaping adjacent to Ash Road North.¹

Figure 3 - Flood Risk Assessment from Natural Resources Wales' website with outline of site shown in red.



3.2 EXISTING BUILDINGS

There are no remaining buildings on the application site, other than a small portion of wall with electrical equipment. Please refer to Figure 2, above.

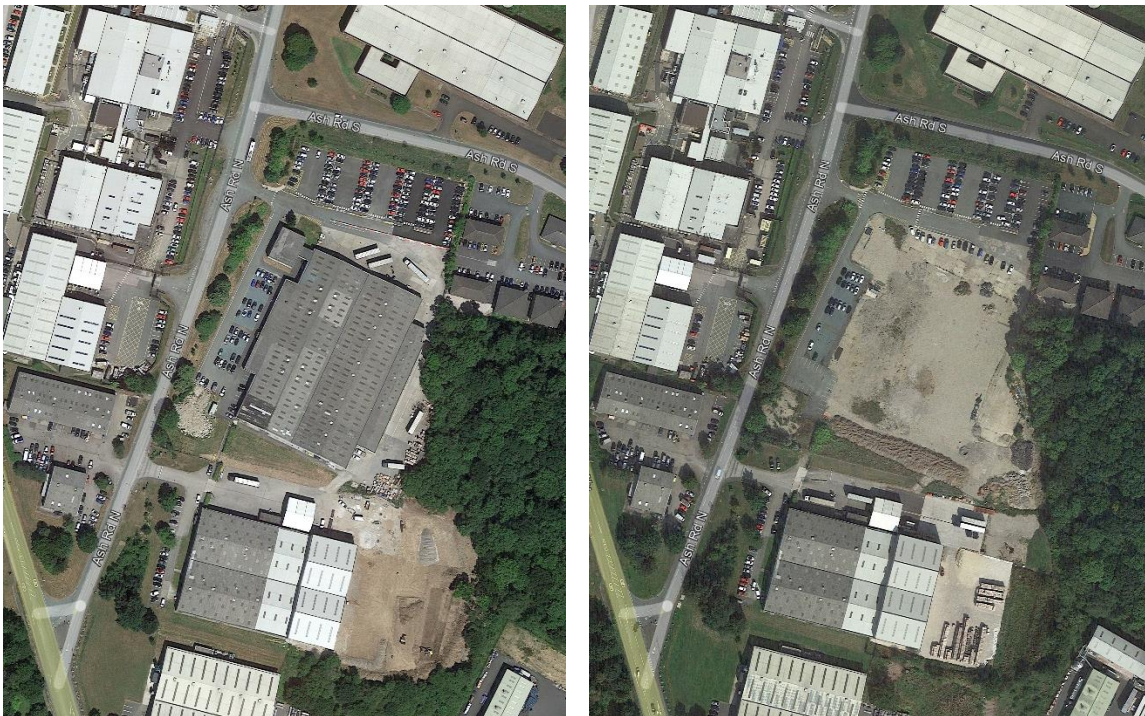


Figure 4 - Google Earth images before and after demolition of existing buildings

¹ Please refer to App. 5: Flood Consequence Assessment and Drainage Strategy



Figure 5 – existing site, looking northwest towards main Ipsen Campus

The Ipsen west site comprises of a series of buildings providing a mix of office, research and development, and manufacturing activities. The existing buildings have been constructed at various stages since Ipsen established itself in Wrexham in 1995. In recent years Ipsen have upgraded and/or replaced their building stock to ensure that the continued to meet the high international standards set by the pharmaceutical industry.

Building One, designed by LMA and now complete, occupies a prominent location in the north east corner of the Ipsen west Site and has provided Ipsen with a significant and prominent new HQ building at Wrexham. Building Five, also designed by LMA and nearing completion is also a manufacturing facility which was provided to support the existing facilities on the west site.

The external appearance of Building Five will inform the choice of materials and colour proposed for the new building on the east site so that there is a cohesive design approach and aesthetic across both sites.



Figure 6 - Buildings One and Five - SW corner

3.3 GROUND CONDITIONS

A Ground Investigation Report has been prepared for the site by GroundSolve². The report provides a review of desk-based information and analysis of previous ground investigations at the site to establish the potential for risks to human health and water resources (ground and surface) from contamination.

Historically the site was on the perimeter of a wartime ordnance factory and a mineral railway passed through the centre of the site prior to its redevelopment as a warehouse. The report concludes that contamination resulting from ordnance manufacture is not considered a significant risk following its redevelopment in the 1960s. The desk study concluded that its former use as a warehouse presents some potential for contamination from hydrocarbon spills, and the demolition of the building could have resulted in contaminated materials being present on site.



Figure 7 - Drone image looking southwest of existing site

The results of site investigation and laboratory analysis from samples taken across the site however indicates low concentrations of potential contaminants and there are no potential off-site sources that would affect the development. It is therefore concluded in the report that the site presents a negligible risk to human health and water resources. No specific remediation is recommended.

² Refer to Appendix 7

4.0 DESIGN DEVELOPMENT

The need for a further manufacturing facility is derived from a company business case to increase the production capacity on the site in Wrexham.

A masterplan has been prepared by Ipsen for the whole site, and whilst this provides a degree of flexibility for future developments, it was decided that the large vacant Ipsen site on the east side of Ash Road North provided the ideal location for a new manufacturing building for Ipsen.

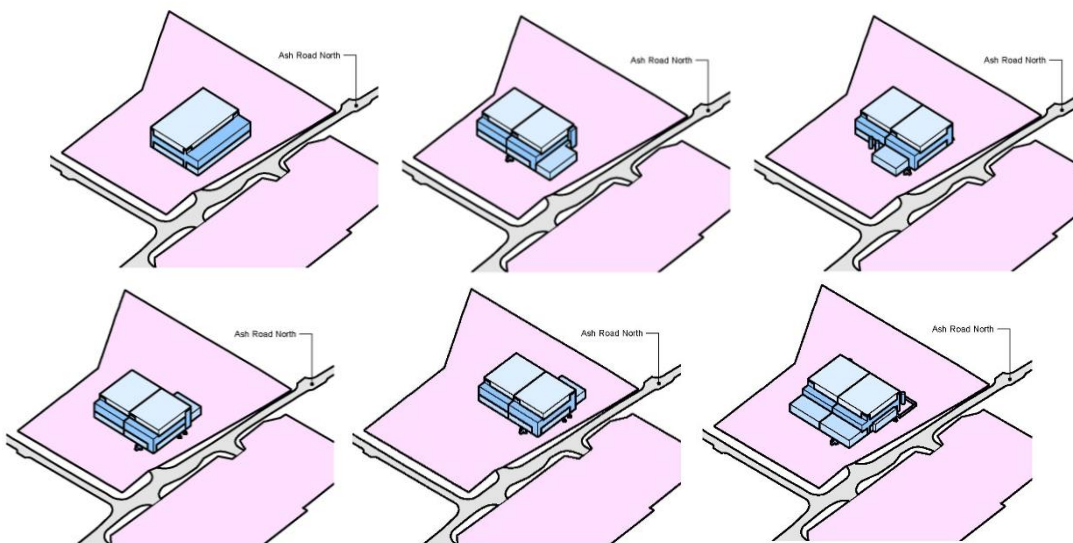


Figure 8 - site layout options

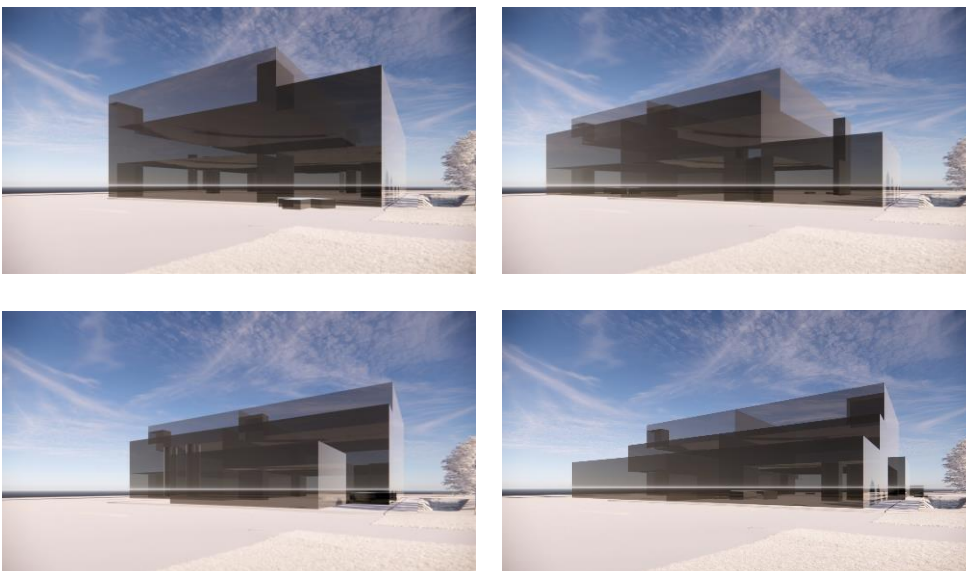


Figure 9 - building form options

The placing of the building has been determined by the relationship with the existing Ipsen campus and reducing the impact from the surrounding roads. The building form is derived from the manufacturing requirements but also from the placement of the Air Source Heat pumps to the north to minimise heat gains. Sustainability is at the core of the design, reducing reliance on fossil fuels where possible.

4.1 PRE PLANNING CONSULTATION

A pre planning consultation exercise (PAC) was undertaken between 2nd and 30th June. A copy of the PAC report is appended to the planning application documents.

5.0 THE PROPOSAL

The new building comprises of a new 3-storey manufacturing facility to supplement existing facilities on the Ipsen west site, housing the manufacturing functions on first floor (Level 02) and a large plant room at ground floor level with air-handling units on the second floor (level 03)

5.1 CHARACTER

5.1.1 Placemaking

The scheme has been developed to meet the high international standards set both by the pharmaceutical industry and Ipsen Biopharm. With more than 400 workers Ipsen is Wrexham's third biggest employer and attracting and retaining staff by creating attractive places to work is of paramount importance to the business.

The proposed development is intended to provide a high-quality facility for the production of new product with finished goods despatched through the neighbouring Building One.

It is imperative that both the building form and external appearance of the new facility relates to the corporate site image exemplified by Buildings One and Five, so that there is a cohesion of design intent and approach across the site moving forwards.

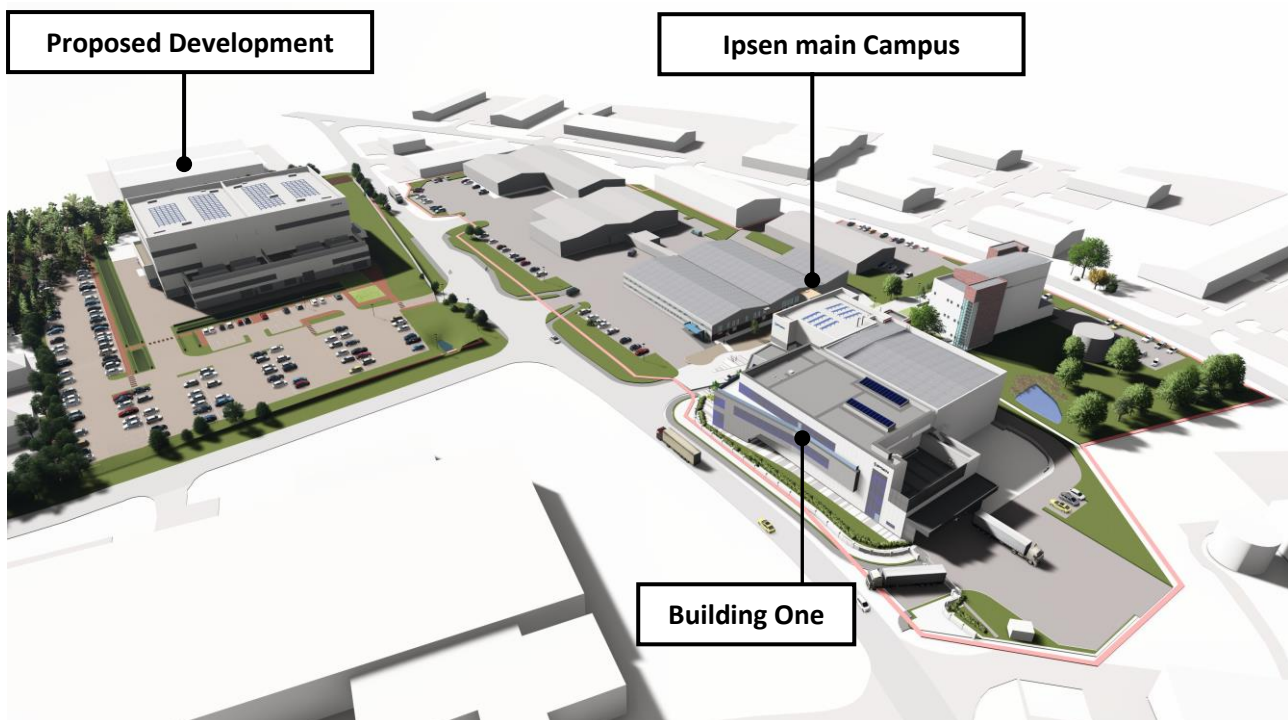


Figure 10 – Visualisation showing the proposal in the context of its environs

Most of the Mechanical Plant will be located on the ground floor of the new building but there will be photovoltaic panels, cowls and flues at roof level, although these will be largely screened by the parapet to the new building. New chiller units will be located on the external plant area at the front (north) of the new building, as shown on the above visualisation.

5.1.2 Amount and density

The total area of the development is approximately 11,220 m² (GEA) over three floors:

- 01 Ground Floor: 4,110 m²
- 01A Mezzanine: 980 m²
- 02 Second Floor: 2,960 m²
- 02A Mezzanine: 410 m²
- 03 Plant room 2,760 m²

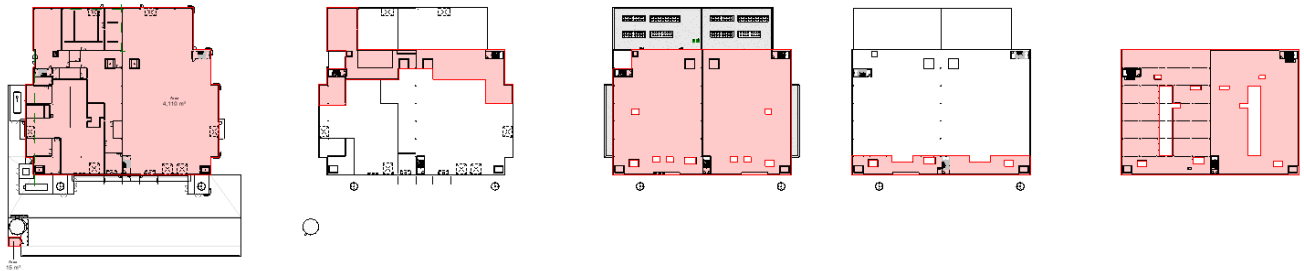


Figure 11 - Floorplans, showing floor areas

5.1.3 Internal accommodation

The building is set out over three principal floors with a large ceiling void and walk on ceiling above the main process for air handling distribution and allow access for maintenance.

The proposed use of the new production facility is as follows:

- Ground Floor (**Level 01** - + 0.0m)
 - The principal access to the main plant room on the ground floor will be from the south elevation. The personnel entrance is to the northwest corner.
 - Large plant room comprising of various plant equipment such as boilers, generators, chillers etc. as well as cold rooms
 - Open plan offices for staff with meeting room
- Mezzanine (level 01A - +3.5m)
 - Additional secondary plant
 - Server and Comms room
 - Staff lockers and breakout space
- First Floor (**Level 02** - + 7.0m)
 - Changing rooms for staff
 - Main process floor serviced by large service riser ducts
- Ceiling Void (Level 2A plant support - + 11.00m)
 - Walk on ceiling above main process floor to allow for services distribution
 - Mezzanine level for equipment that requires solid support.
- Second Floor (**Level 03** plantroom - + 14.0m)
 - Air handling units (AHU'S) and service riser ducts
- Roof
 - Ventilation cowls and extract flues
 - Photovoltaic panels

The main entrance to the building will be located on the west elevation. The new entrance will have secure access.

An open plan office is provided in the north west corner on the plan, with a separate meeting room. An accessible WC and general WC will be provided at entrance level 01.

The remainder of the ground floor accommodates all of the main utility plant and there will be a mezzanine floor within this space to accommodate other items of plant.

The north side of the new facility will have large louvres to allow for ventilation to the internal plant. The provision of large service doors on the south side will allow for future maintenance/removal of the large items of plant on the ground floor. There will also be large service doors (for engineering/maintenance access) on both the west and east elevation, and large roller shutter doors on the north elevation to enable future maintenance and attendance to the chilled plant in these areas of the ground floor.

The mezzanine floor will accommodate secondary plant equipment and provide access to tall elements, along with server rooms and communications equipment. Welfare facilities for staff, including locker rooms are provided for staff at this level.

The first floor (Level 02) is the main process floor comprising of specialist cleanroom areas within the internal layout with ancillary administration areas. There are wide circulation and viewing corridors to the sides of each production area, and a wide circulation corridor on the north side. Windows to the west and east elevations will bring natural daylight into the building and allow views in and out accordingly. The layout of the building ensures that there is a clean clear flow for all building users.

There is a large void above this process floor, with a walk on ceiling to allow for maintenance of the HVAC duct distribution within this space. Level 03 houses the large air-conditioning units necessary to maintain the sterility of the environment for the manufacturing process.

The roof construction will be a shallow pitch roof (with the ridge running on the north/south axis) and a composite roof construction. The roof will have a series of ventilation cowls and flues to service the areas below. There will also be photovoltaic panels fixed to the roof.

The roof construction to the lower section of the building to the north will be a concrete flat roof to support the air source heat pump installation. These are screened by louvres.

There are three stair cores, along with separate roof access. Two goods lifts are provided, an engineering lift to level 03 and a personnel lift to level 02.

5.1.4 Scale

The building form is derived from the optimum layout for the new process floor and the specialist equipment that will be accommodated therein on Level 02. This floor is set at 7.0m above ground. The footprint at ground level is 71.7m by 61.7m. This reduces to 66m by 46.4 above level 02. The maximum height above ground level is c.22m to top of parapet.

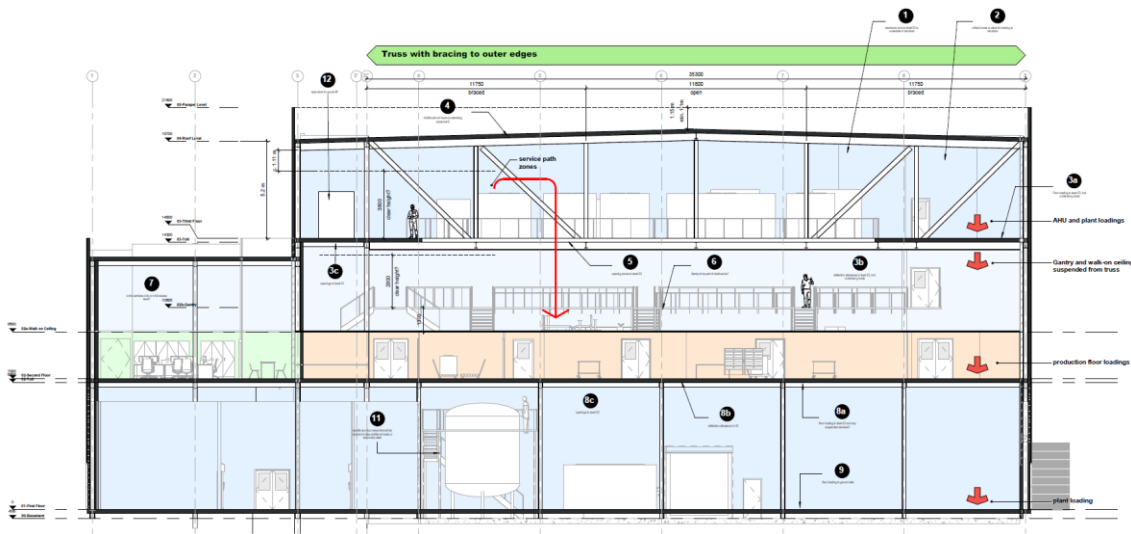


Figure 12 - preliminary functional diagram

The building section derived is a direct response to the proposed building function - generally comprising of wet/heavy plant at ground floor, with the principal floor - which houses the main process areas - elevated at + 7.0m above ground level. There is a mezzanine at Level 1A (+ 3.2m), a walk on ceiling at Level 2A for plant (AHU distribution) (+ 10.0m) and a further plant level at Level 3 (+14.0m) to accommodate the air handling units.

5.1.5 Layout

The character of the development is derived from the context of the Ipsen Campus. It is designed to a high standard, reflecting the values of Ipsen as responsible enterprise and employer. The building is placed to retain the existing trees on site. The façade will reflect the materials being used elsewhere on the Ipsen Campus- metal composite panels with darker accent panels interspersed on the light-coloured main façade to break the mass down.

5.1.6 Appearance

The new building's external appearance will match the external colours of Building Five on the Ipsen west site. The building will have a clinical feel and the external envelope of the building will be powder-coated metal cladding with a small element of glazing on the west, east and north façades.

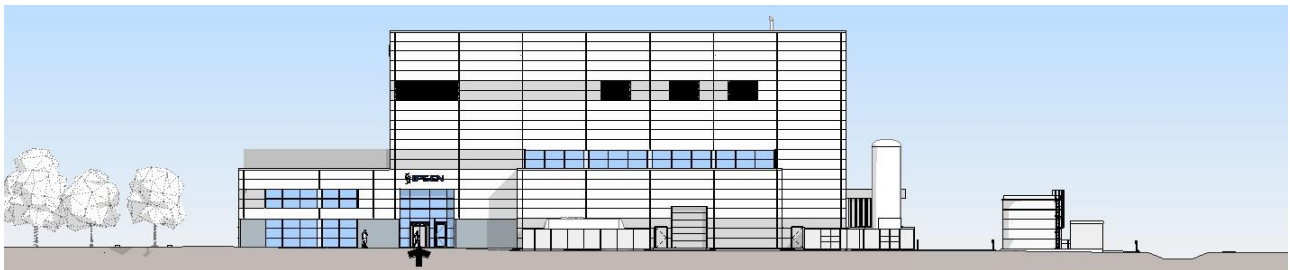


Figure 13 - Proposed Elevation from Ash Road North

The main body will be light-coloured metal cladding panel to colour match the cladding on Building Five, with a contrasting grey colour band around the windows on the west, east and north elevations and to the lower level, coloured to match the grey cladding of Building Five.

The glazing frames will be powder-coated aluminium and the glazing will have thermal properties that will be effective in both hot & cold weather and provide glare reduction. The colour of the curtain walling frames will be grey.



Figure 14 - view from Ash Road North of Buildings One and Five

5.1.7 Landscaping

The Phase 1 Habitat survey revealed that most of the existing site is dominated by stone fill on the footprint of the former building and extensive car parking. There are also significant piles of spoil resulting from the demolition process of the previous building

The arboriculture report details the status of the trees on and immediately adjacent to the site.

The tree records recorded include 32 individual trees, 4 tree groups and 1 woodland. The woodland group (W07, Erlas Black Wood) has been recorded as category 'A', 15 tree records have been recorded as category 'B', 38 as category 'C' and 1 as category 'U', in accordance with British Standard BS5837:2012.

The landscape design³ is driven by the over-riding goals of:

- Preserving the existing trees on site
- Providing new trees and hedges
- Incorporating a green drainage strategy
- Achieving a Bio-diversity net gain in order to contribute to the recovery of nature
- Addressing the functional needs of the development as efficiently as possible, with minimal impact on biodiversity and the landscaping.

To that end, swales surround the building to north, east and south sides. Hedging and broad-leaf trees are incorporated in the swale design, along with rain gardens, wildflower and meadow planting. A maintenance strategy will be put in place to allow these areas to grow out in order to provide meaningful well managed habitat.

³ Refer to Landscape Strategy drawing by Landstudio, LST-XX-XX-DR-L-0100

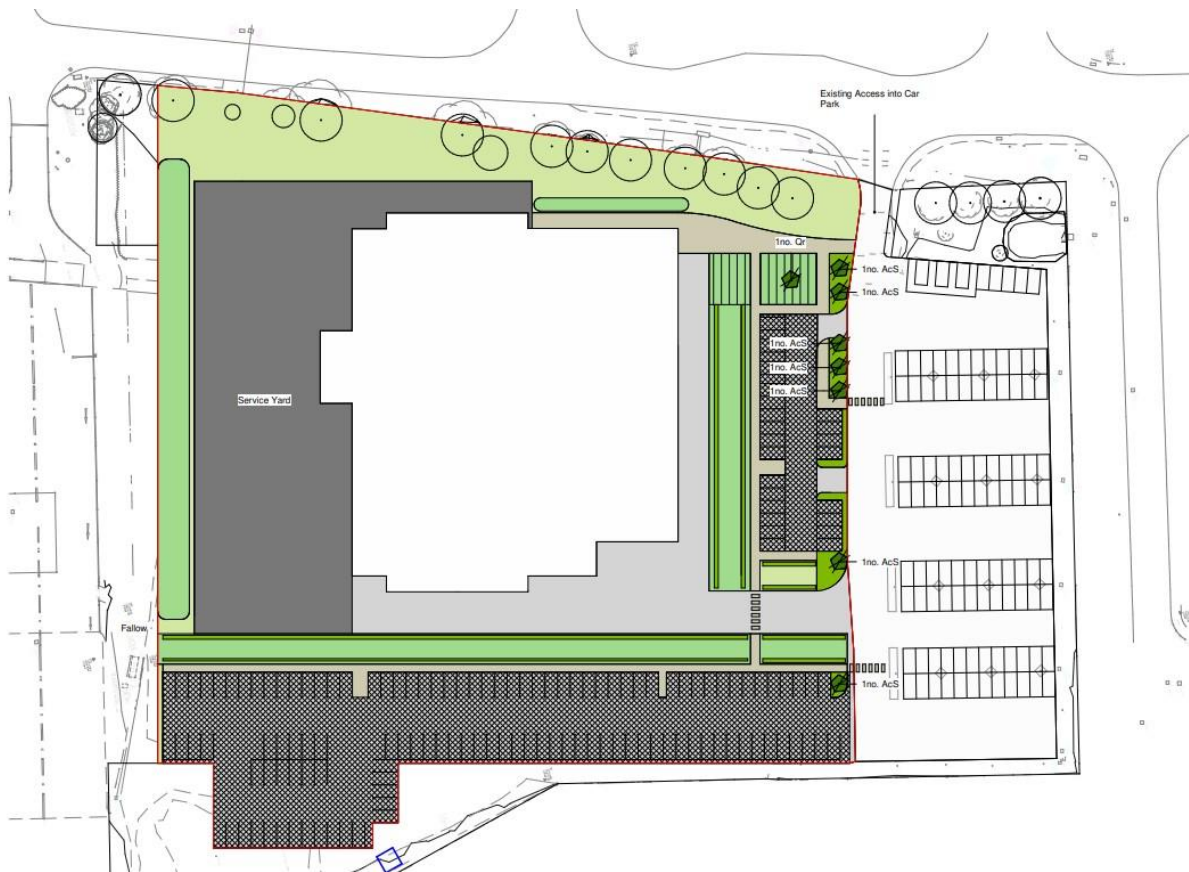


Figure 15 - landscaping and planting layout replace this diagram

5.1.8 Parking

The proposal includes for the provision of 24 spaces dedicated to the new facility, along with the reorganisation of the 121 spaces currently contained within the application boundary. The site currently has 264 parking spaces used by Ipsen Staff across their whole estate and the reorganisation proposals ensure that these 264 spaces are maintained.

A Transport Statement⁴ has been prepared by Axis:

The Proposed Development includes for the rationalisation of the existing Ipsen parking arrangements on-site, as well as to provide sufficient parking for the Proposed Development.

The proposed level of parking provision has been considered in relation to the parking requirements of the Proposed Development, as established based on the traffic generating potential of the site. The proposed addition of 24 car parking bays is considered to be sufficient to accommodate the additional parking demand generated by the proposal.

⁴ Refer to Appendix 1

5.2 MOVEMENT

The Transport Statement prepared by Axis states:

In summary, the site is reasonably well located to facilitate staff journeys to be made by sustainable travel modes. Notwithstanding the general desirability to separate industrial activity from residential land uses, the site can nonetheless be accessed by cycle and bus from surrounding residential areas, with the additional possibility of multimodal rail / cycle trips for those willing to undertake longer journeys by cycle.

The site is based in the middle of the Wrexham Industrial Estate which is serviced by a regular bus service with a convenient stop along Ash Road North- routes 41 & 42C.

5.2.1 Staff

Ipsen staff are encouraged to walk or cycle to work and to make good use of the cycle stores that are located on the existing west campus.

Ash Road North and Ash Road South are listed as “future walking and cycling routes”⁵.

For those arriving by car, Ipsen provide on-site parking for key members of staff.



5.2.2 Visitors

On arriving on site, all visitors are required to report to the main reception and security desk within Building One on the west site, having already notified the reception staff in advance of their arrival. Visitors are then met by their host and accompanied at all times whilst they remain on site.

Figure 16 - future walking and cycling route

Ipsen have recently installed new drop kerbs and crossing points on Ash Road North and Ash Road South under a Section 278 Agreement with WCBC. This has significantly improved the pedestrian links between the west and east site. For regular members of staff or visitors who have already been inducted, they can park on the east site and walk along the clearly defined paths on the site to access the facility.

Ipsen have also recently submitted a Planning Pre-Application in order to establish if the local authority and highways authority would support the installation of a traffic light-controlled crossing to Ash Road at the applicant’s expense. This may improve the flow of pedestrians and pedestrian safety generally for those existing employees who park on East site whilst working on West Site. This is mentioned here for information as this pre-application has no bearing on the staff who will operate this development.

5.3 ACCESS

5.3.1 Pedestrian access

Pedestrian access in and around the site is clearly marked as a footway with painted hatching and with drop kerbs where required, to allow wheelchair users to easily gain access along all routes.

⁵ Active travel network map

5.3.2 Vehicle Access

Vehicular access off Ash Road North to the site will remain unaltered and this existing access will continue to be used for site access for both staff and for service vehicles, deliveries etc.

5.3.3 Approach to the building

Access to the new building will be achieved via a revolving entrance door on the west elevation, with a pass door also provided. Access to the new building will be strictly limited to key personnel and visitors only. It is envisaged that only 20-24 workers will operate within the building at any given time, and there will be 2 shifts every 24 hours.

5.3.4 Horizontal circulation within the building

All doors and corridors within the building have been sized in accordance with Approved Document M. Signage on doors will comply as recommended in BS8300:2001.

5.3.5 Vertical circulation within the building

The mezzanine (01B) and process floor (level 02) to the new building will be accessed from a personnel lift or stairs, conveniently located next to the new entrance lobby.

Above level 02 is entirely plant room accommodation and no wheelchair accessibility is required. All the stairs are sized to Part M requirements.

Goods lifts are located to both halves of the main building and to be used occasionally for operations within the new facility. An engineer's lift is also to be provided in the SW corner of the new building to aid future maintenance of process and plant equipment.

5.3.6 Lighting - Internal

Lighting will be designed so as not to cause glare and to give an even distribution of light combined with the available natural daylight where possible at various times of the day.

Where it is envisaged that there will be light glare within communal and circulation spaces consideration will be given to positioning and type of light sources. Where considered appropriate the use of non-reflective glass will be considered. Lighting will be compatible with the signage and that veiling glare is not occasioned by spotlights etc. when viewed at varying levels from sitting to standing.

5.3.7 Lighting – External

External lighting will be carefully co-ordinated. A Good lighting scheme will help to deter intruders and reduce the fear of crime see section 5.4.8 below.

5.3.8 Final Fire Exit Doors

Final fire exit doors will comply with Building Regulations Part B and will incorporate the following with regards to secure by design:

- Comply with BS476 and must comply with Fire regulations doors and be devoid of any external furniture.
- External devices used on the doors will be strong enough to keep intruders out whilst allowing occupants to escape. Escape hardware will comply with Building Regulations Part B and British and European Standards BSEN 1125 (for panic hardware) and BSEN179 (for emergency exit devices)
- Panic push bar or similar locking system

- Door alarm fitted and linked to alarm panel either monitored by house manager or central monitoring command. Appropriate signage to warn of alarmed doors

5.3.9 Sanitary provision

An accessible WC and a separate unisex WC are provided on the ground floor of the new facility. Additional unisex WCs are provided on the main process floor at Level 2. Horizontal travel distances to an accessible WC are less than 40m, and the proposal provision is therefore considered adequate and inclusive (in accordance with LPG Note 12 and Approved Document M). The overall domestic Foul flows from the development will be less than 1 litres/second.

A Development Enquiry is underway with Welsh Water in relation to the discharge of these domestic flows to the head of Welsh Water sewer in Ash Road South and an in-principle approval to this flow has been provided by Welsh Water. The drainage strategy for the proposed development is described in full in Appendix 6: Flood Consequence Assessment and Drainage Strategy by Land Studio.

5.4 ENVIRONMENTAL SUSTAINABILITY

5.4.1 Land-use, Ecology / Biodiversity and Local Environment

The Preliminary Ecological Assessment⁶ by Cambrian Ecology Ltd. makes recommendations in relation to the retention of the trees and grassland on the northern and western boundaries of the site.

The likelihood of protected species being present is considered by the ecologist to be generally low, but precautionary reasonable avoidance measures will be taken to ensure that there is no detriment to the maintenance of the favourable conservation status of the local population of Great Crested newts. A number of potential planning conditions have been suggested by NRW in their response to the Pre-Application Consultation including the incorporation of GCN avoidance and mitigation measures and the submission of a Bio-diversity Risk Assessment and Conservation Plan. The applicant would welcome these conditions in due course and would welcome the opportunity to discuss and agree them in collaboration with the LPA's own Ecology Officer.



Figure 17 – Potential Hibernaculum location

The landscaping scheme for the proposed development includes retention of existing trees, areas of new native tree planting, native hedgerow planting, wildflower grassland, and the provision of hibernacula for herpetofauna as noted in figure 17.

The removal of an existing Bamboo planted area on the site was undertaken before this year's nesting season and this is considered as a biodiversity gain, Bamboo being an invasive species. Nonetheless, additional areas of semi-improved grassland, managed to promote biodiversity, are included in the proposed scheme.

An Arboricultural Impact Assessment & Arboricultural Method Statement was commissioned from Tree 21⁷. The tree survey recorded 32 individual trees, 4 tree groups and 1 woodland. The woodland group (Erlas Black Wood) was recorded as Category 'A', 15 trees were recorded as Category 'B', 38 as Category 'C' and 1 as Category 'U'. The proposed development has been designed to ensure that all of the Category A and B

⁶ Refer to Appendix 4

⁷ Refer to Appendix 5

trees/tree groups are not affected by the development, including Erlas Black Wood. Only six trees would be removed, all of which are Category C. As set out above the proposed landscaping plan includes provision for the planting of native trees within the site. Figure 18 below indicates the root protection zones and fencing which will be provided during construction along the Western Boundary.

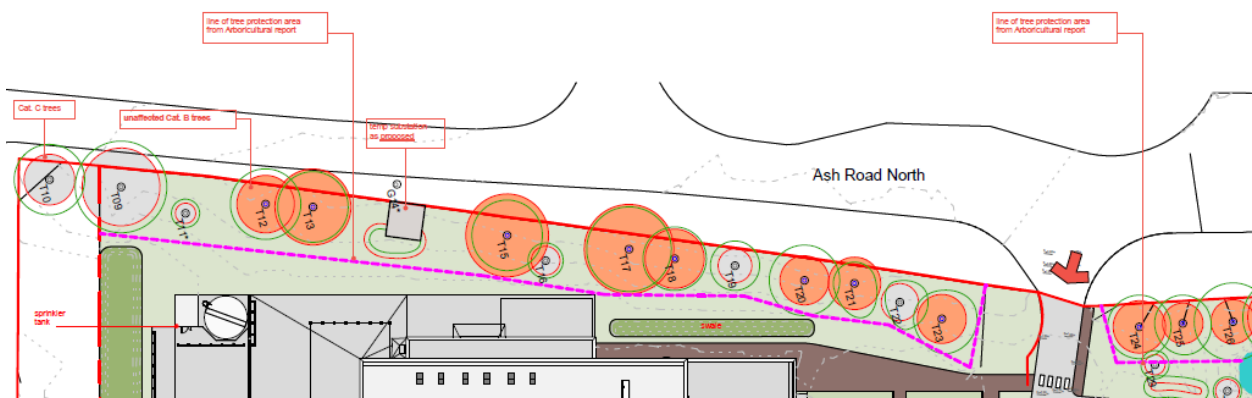


Figure 18 - overlay of trees with root protection fence on proposal

5.4.2 Lighting – Ecology/Light Pollution

The adjoining land to the three site boundaries to the North, South and West are already brightly illuminated, along with the majority of the industrial estate. The following measures will be considered in the lighting design for the eastern boundary with the woodland. These are all noted in the Preliminary Ecological Appraisal⁸ included as Appendix 4.

- There will be no exterior lighting directed towards the woodland outside the site's east boundary.
- All exterior lighting on the eastern side of the new industrial unit will be 'low level' and will be movement activated.
- The illumination used will be 'Light Emitting Diodes' (LEDs).
- The illumination will be directional and downward facing to avoid illumination of the wider area.
- There will be no upward illumination in any direction where it could inhibit bat movements.
- All luminaires will lack any UV component.
- Luminaires with a 'warm white' spectrum should be used, (ideally <2700 Kelvin) to reduce the blue light component.

Luminaires will feature peak wavelengths higher than 550nm to avoid the light component most disturbing to bats

5.4.3 Energy and Resource Efficiency

The client's environmental policy directed the design of the building using a 'fabric first' approach to energy efficiency. The thermal envelope of the building is to be constructed to meet the current Building Regulations standards. To reduce solar gains, and hence energy demand for artificial cooling, the proposed glazing will be largely confined to the west, north and east elevations only.

To comply with the current Building Regulations Part L, it is proposed that we will implement a number of energy-saving measures to avoid overheating due to passive gains and meet the Target Emissions Rate (TER) established through the Part L modelling exercise. This will include:

⁸ Refer to Appendix 4

- Provision of a building envelope to be constructed and tested to achieve an air tightness figure of 5 m³/(hm²) at 50Pa or better
- Use of energy efficient construction materials (typically external walls to achieve a U value of 0.18 W/(m²K), Roof U value of 0.14 W/m²K
- All glazing to achieve a U value of 1.0 W/m²K or better and a G value of 0.317
- Use of efficient boiler plants for heating (91% or better)
- Use of efficient chiller plants (SEER 3.6 or better) and air-source heat pumps. The new chiller plants will be located on the external plant area at the front (north) of the new building (as shown on the proposed site plan drawing)
- The use of variable speed pumping on above systems
- The use of DALI dimmable LED lighting and control by presence/absence detection with daylight/ambient light sensing control throughout
- The use of high efficiency motors and inverter drives.
- Provision of an Energy Monitoring System with automated targeting & monitoring of “out of range” values
- It is proposed that photovoltaic panels will be installed at roof level.

5.4.4 Sustainable materials

The client's in-house policies relating to building materials mean that wherever possible local materials will be used to reduce embodied carbon and in support of the local economy and the timber will be FSC.

5.4.5 Water Efficiency and Surface Water Run-off

All sanitary ware within the new building will be specified with low flow rates to ensure the optimum water efficiency. The drainage strategy for the proposed development is described in full in Appendix 6: Flood Consequence Assessment and Drainage Strategy by Land Studio.

With the introduction of hard standing across the site, the surface water will be collected in swales to attenuate and filter the run-off. We will be reviewing and preparing a sustainable drainage solution for review and approval by the SAB officer simultaneously with the full planning application. The development will create a new hardstanding area to the south to provide a new service yard for the facility and the treatment of the surface water drainage for this area will also be dealt with under the SUDs design proposal and subsequent SAB application.

5.4.6 Waste management, Refuse and Recycling

Ipsen has a fully existing established waste management system that is required in a pharmaceutical facility. The new building will be incorporated into the existing system, which will be expanded as required.

Waste Water from processes will be disposed to the head of Welsh Water's Foul Sewer in Ash Road South via the site foul drainage system. A Trade Effluent Agreement is currently in negotiation with Welsh Water for a discharge of 4 litres/second with a cap on quantity discharged over a 24-hour period. An in-principle flow rate, volume, and set of criteria for this discharge has already been reached with Welsh Water.

5.4.7 Pollution

An Environmental Impact Assessment Screening exercise⁹ has been undertaken by Axis which concludes that these proposals would not constitute an EIA development:

The manufacturing process at the facility would not give rise to any special category wastes or process emissions to air or water which would require an environmental permit. Emissions to air would be

⁹ Refer to Appendix 1, Environmental Impact Assessment Screening

typical of those associated with large manufacturing warehouses such as HVAC ducts, breather vents and small-scale steam emissions. Industrial noise emissions would be limited to the operation of air source heat pumps and air cooled chillers. As set out above the proposed development does not involve any chemical or biological processes.

The active pharmaceutical ingredient (API) used in process is classed as a toxin. However, the facility is designed with containment in mind using negative pressure isolators and High Efficiency Particulate Air (HEPA) filtration to ensure no personnel come into contact with the API. The same API is used elsewhere on the Ipsen site so safe handling procedures and decontamination procedures, in the event of spillage, are well established and form part of the site's normal operating procedures.

5.4.8 Phosphates

A Position Statement¹⁰ has been prepared to assist WCBC in making an initial 'test of Likely Significant Effect' under the Habitat Regulations in relation to phosphorus inputs from the proposed development which we believe should allow the local authority to consider that these proposals can be screened out. Of the 24 operatives at the facility, it is very likely that a significant number already live and work within the SAC. The position Statement also references a fall-back position that can be considered as mitigation if any concerns remain.

As noted in section 5.3.9 above a developer enquiry is currently underway with Welsh Water and they have already indicated that they can accept 1 litre/second flow rate for domestic waste from the welfare facilities within the development.

5.5 COMMUNITY SAFETY

The new building is positioned within the boundaries of a secure site currently operated by the applicant. During the design process any changes to the perimeter of the site which may affect the community's safety were carefully assessed to help prevent crime and ensure community safety.

During the construction period all security will be maintained to ensure that members of the public cannot enter the building site.

It is proposed that the existing green palisade fencing to the western boundary will be retained, and extended to the southern boundary (with Proserve). By virtue of the surface water design strategy and landscaping proposals, new swales will be provided to the south, east and north of the new facility, thereby creating natural passive security measures. Crime Prevention through Environmental Design approach (CPTED) is a multi-disciplinary approach to deterring criminal behaviour that changes peoples' behaviour in a place (and towards a place) by altering landscapes and buildings' designs. In practice, CPTED seeks to maintain high levels of security whilst also improving the quality of life of the people who must live and work in the secure environment.

Due to the proposed site being located on an existing industrial estate, no other impact on community safety is anticipated.

5.5.1 Lighting -Safety in External spaces

As noted above in section 5.3.7 the external lighting will be carefully co-ordinated, so that potential areas of risk are adequately covered. A good lighting scheme will help to deter intruders and reduce the fear of crime. It is a prerequisite that the following areas are included in the lighting scheme:

- Main site access and main entrance to the new facility

¹⁰ Refer to Appendix 2, Phosphates Screening Opinion

-
- Service door accesses to the south, west and east
 - All footpaths and associated areas to the new building

To all other commercial access door/fire exit doors all lighting will be switched automatically, e.g. Photo electric cell, time Switch or passive infra-red.

5.6 LIST OF APPLICATION DRAWINGS

Drawing ID	Revision	Title
IED-LMA-ZZ-XX-DR-A-7010	P2	SITE_Location Plan
IED-LMA-ZZ-XX-DR-A-7020	P2	SITE_Plan-Existing
IED-LMA-ZZ-XX-DR-A-7030	P2	SITE_Plan-Proposed
IED-LMA-XX-XX-DR-A-7035	P2	Newt Hibernaculum
IED-LMA-XX-XX-DR-A-7036	P2	Tree And Access Diagram
IED-LMA-ZZ-01-DR-A-7040	P2	GA_PLAN_Level01
IED-LMA-ZZ-01-DR-A-7041	P2	GA_PLAN_Level1A
IED-LMA-ZZ-02-DR-A-7042	P2	GA_PLAN_Level02
IED-LMA-ZZ-2A-DR-A-7043	P2	GA_PLAN_Level2A
IED-LMA-ZZ-03-DR-A-7044	P2	GA_PLAN_Level03
IED-LMA-ZZ-RF-DR-A-7045	P2	GA_PLAN_Roof
IED-LMA-XX-XX-DR-A-7050	P2	Elevation West
IED-LMA-XX-XX-DR-A-7051	P2	South Elevation & Section
IED-LMA-XX-XX-DR-A-7052	P2	East Elevation& Section
IED-LMA-XX-XX-DR-A-7053	P2	North Elevation & Section

5.7 RESPONSE TO PLANNING POLICY

The Ipsen Site is within the jurisdiction area of Wrexham County Borough Council (WCBC). The Unitary Development Plan (UDP) 1996 - 2011 was adopted by Wrexham County Borough Council on the 14th February 2005. Wrexham County Borough Council is preparing the Local Development Plan (LDP2) which will replace the current adopted Unitary Development Plan.

The following local planning guidance notes have been noted and referred to for guidance in the preparation of our design.

- National Policy:
 - PPW 11
- Wrexham Unitary Development Plan Policies:
 - GDP1 (General development principles)
 - EC4 (Trees)
 - EC6 (Biodiversity conservation)
 - EC13 (Surface Water)
 - E1 (Employment)
 - T8 (Parking)
- Strategic Policies:
 - PS1
 - PS2
 - PS3
 - PS4
- Relevant Supplementary Planning Guidance:
 - LANDMAP Character Area 11 – Wrexham Ind Est.

APPENDIX 1: ENVIRONMENTAL IMPACT ASSESSMENT SCREENING

Prepared by Axis on behalf of Lovelock Mitchell

The EIA Regulations¹¹ set out the two circumstances where a proposed development requires an Environmental Impact Assessment (EIA):

- Schedule 1 development; Development of a type listed in Schedule 1 always requires EIA.
- Schedule 2 development; Development of a type listed in Schedule 2 requires EIA if it is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The development is not a Schedule 1 development and therefore a mandatory EIA is not required. In coming to this conclusion, it is noted that Schedule 1 includes at paragraph 6e:

“Integrated chemical installations, that is to say, installations for the manufacture on an industrial scale of substances using chemical conversion processes, in which several units are juxtaposed and are functionally linked to one another and which are for the production of basic pharmaceutical products using a chemical or biological process”.

The proposed development will form part of the process of the manufacture of a pharmaceutical product. However, there would be no chemical conversion processes undertaken at the facility. In simple terms the facility would involve:

- i) the dilution of pre-manufactured pharmaceutical product;
- ii) introduction of salts and additives;
- iii) injection of the solution into glass vials;
- iv) freeze drying and capping of the product.

The production process would not involve any chemical or biological processes.

In relation to Schedule 2 the proposed development does not fall clearly within any of the development categories listed in paragraphs 1 – 12 of Schedule 2. However, it may be considered to be captured by one of three categories set out Table 1 below.

¹¹ Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Table 1: Schedule 2 – Development Description Categories

<i>Description of Development</i>	<i>Applicable Thresholds and Criteria</i>
6. Chemical Industry (unless included in Schedule 1) (b) - Production of pesticides and pharmaceutical products, paint and varnishes, elastomers and peroxides	The area of new floorspace exceeds 1,000 square metres.
10. Infrastructure projects (a) Industrial estate development projects	The area of the development exceeds 5 hectares
13. Changes and extensions: (a) Any change to or extension of development of a description listed in Schedule 1 (other than a change or extension falling within paragraph 23 of that Schedule) where that development is already authorised, executed or in the process of being executed. (b) Any change to or extension of development of a description listed in paragraphs 1 to 12 of column 1 of this table, where that development is already authorised, executed or in the process of being executed.	The development as changed or extended may have significant adverse effects on the environment. (a) The thresholds and criteria in the corresponding part of Column 2 of this table applied to the development as changed or extended are met or exceeded; and (b) in such a case the development as changed or extended may have significant adverse effects on the environment.

The development area is less than 5ha and is not within a 'sensitive area' as defined by the EIA Regulations, therefore category 10. does not apply.

As set out above, there are no chemical processes involved in the development and so category 6. does not apply. In relation to category 13. the facility is a standalone development. Whilst it would process products received from the Ipsen development to the west of Ash Road North, the application is not for a change or extension to those existing developments. On this basis the proposed development would not be deemed to be EIA development.

Notwithstanding this, case law is clear that the EIA Directive, and therefore the associated regulations, have a 'wide scope and broad purpose' and so the description of development should not be interpreted too strictly. As such the proposed development may be deemed to be captured by category 6. and /or 13 due to its relationship with the existing Ipsen site to the west of Ash Road North.

On this basis we have considered the potential for the proposed development to give rise to likely significant environmental effects with reference to the criteria set out in Schedule 3 of the EIA Regulations.

Schedule 3 sets out three main criteria against which the development should be considered, as follows:

- 1) Characteristics of development;
- 2) Location of development; and
- 3) Types and characteristics of the potential impact.

The proposed development is a manufacturing facility which would be similar in nature to other buildings and operational facilities within Wrexham Industrial Estate. Of key relevance is the fact the site is located within a purpose-built industrial estate which is allocated for employment uses of a type similar to that proposed. In this regard the type's impacts that could arise from the proposed development have already been deemed acceptable in principle. Furthermore, the proposed development would be located on a site where a previous large-scale warehouse operated for in excess of 50 years.

As set out above the site does not contain any sensitive environmental features that would be impacted by the proposed development, including those described in Schedule 3.

The manufacturing process at the facility would not give rise to any special category wastes or process emissions to air or water which would require an environmental permit. Emissions to air would be typical of those associated with large manufacturing warehouses such as HVAC ducts, breather vents and small-scale steam emissions. Industrial noise emissions would be limited to the operation of air source heat pumps and air-cooled chillers. As set out above the proposed development does not involve any chemical or biological processes.

The active pharmaceutical ingredient (API) used in process is classed as a toxin. However, the facility is designed with containment in mind using negative pressure isolators and High Efficiency Particulate Air (HEPA) filtration to ensure no personnel come into contact with the API. The same API is used elsewhere on the Ipsen site so safe handling procedures and decontamination procedures, in the event of spillage, are well established and form part of the site's normal operating procedures.

In relation to landscape impacts the development would be entirely in keeping with other development on the industrial estate and would not be out of context in terms of scale or appearance. The remainder of this Design and Access Statement (DAS) explains the design rationale and how the development would make a positive impact in the context of the built environment across the industrial estate. The DAS also outlines how the proposal would utilise renewable energy in its operation, with Ipsen Wrexham site being the first in the company to use 100% renewable power; impacts in relation to climate change are therefore negligible.

Based on the above it is considered that based on the characteristics and location of the development, as well as the types and characteristics of the potential impacts which could arise, the proposed development is unlikely to give rise to significant environmental effects.

As such even if the proposed development was considered to be captured by category 10. (a) or 13. (a) or (b), it would not constitute EIA development. The application is therefore not accompanied by an Environmental Statement.

Nonetheless, and as outlined above, various environmental assessments and technical reports have been provided with the application to enable Wrexham Council to understand the relevant key impacts of the development in the context of the policies of the Statutory Development Plan.

APPENDIX 2: PHOSPHATES SCREENING OPINION

‘Test of likely significant effect’

This paper is a Position Statement in relation to phosphorus inputs from the proposed development which we believe should allow the local authority to consider that these proposals can be screened out.

It has been prepared to assist WCBC in making an initial ‘test of Likely Significant Effect’ under the Habitat Regulations.

The site is located within the catchment of the River Dee which is classified as a SAC. It is proposed that the very limited amount of foul water from the re-developed site will discharge via the Welsh Water foul water sewer in Ash Road South. A Developer Enquiry is currently underway with Welsh Water and they have given and in-principle agreement to a discharge rate of 1 litre/second.

Ipsen’s tenant Proserve vacated the original building in 2018 and Ipsen demolished the building later that year to facilitate the design and construction of this new manufacturing facility.

Design of this new facility originally commenced in 2019, very soon after the demolition of the original building, but was however put on hold due to the Covid Pandemic.

The new development proposed for the site is a state-of-the-art automated commercial/industrial building for pharmaceutical manufacture.

NRW Advice to Planning Authorities – July 2022

We believe that the proposed development satisfies the NRW test for being: *“not likely to have a significant effect on a river SAC in relation to phosphorus inputs, as there is unlikely to be a source of additional phosphorus or pathway for impacts”*.

Taking the headings from the NRW guidance the proposed development:

- *does not increase the volume and phosphorus concentration of wastewater* (when compared to the former use of the site)
- *improves existing water quality discharges by reducing the phosphorus concentration of wastewater without increasing volume or by decreasing the volume of wastewater produced without increasing the concentration of phosphorus* (when compared to the former use of the site with its outdated sanitaryware and uncontrolled water use)
- *is a development intended to provide services, facilities, commercial sites, or places of employment (e.g., community buildings, schools etc.) for a local population already served by residential connections to existing public or private sewers discharging within the SAC river catchment* (the building will be staffed and maintained by a very small local workforce (24 operatives) and the majority of this workforce are either already employed by Ipsen on the adjacent Ipsen West Site or will be recruited locally and therefore are already domiciled withing the SAC)

WCBC Planning Guidance – New River Phosphate level targets

It is noted that in the WCBC guidance (which complements the NRW guidance) lists developments that may be affected, suggesting that only commercial developments where overnight accommodation is provided should be affected.

The proposed development is a commercial development where overnight accommodation is not provided so we believe that the proposals satisfy this guidance.

The guidance also states that applications that WCBC are still able to determine include any development which improves existing water quality discharges by reducing phosphates in wastewater, or by decreasing the volume of wastewater produced (for example, by improvements to existing wastewater treatment infrastructure). These proposals significantly reduce the volume and phosphorous concentration of foul sewer discharge when compared to the previous use of the site although it is recognised that the previous use ended in 2018.

Comparison: Demolished Building vs new Manufacturing Facility

Original building (Leased to Proserve). 8000m² overall building footprint

Facility designed to accommodate circa 60 Office and administrative staff plus the lorry drivers in addition and included full canteen facilities on site. Between 2015 and 2018 the facility was wound down to the point where there were 20 permanent staff when the facility was vacated by Proserve. Circa 10 Toilets and 10 WHB's – *all facilities were old/dated therefore excessive water use extremely likely*

Ipsen East Site New Manufacturing Facility

4000m² overall building footprint (2 modules of 2000m²). 12 staff are required to operate each module and the building operates on a 24/7 basis. Total staff occupying the building at any one time when fully complete and both modules are operational therefore is 12 x 2 = 24. The building operators will work on a shaft pattern. All Sanitary ware will be modern low flush/low water use. There is to be no commercial kitchen just basic canteen/tea station/rest area provision.



Figure 19 - Proserve building pre-demolition

Building Occupancy and staffing

As noted above the new facility will be operated by 24 members of staff at any given time working on a 24/7 shift pattern. There is no overnight accommodation.

Many of the staff will be drawn from the existing staff on the Ipsen site in Wrexham. Ipsen operate a sustainable business and there is a policy for local recruitment wherever this is practical and Ipsen are recognised by Welsh Assembly Government and the local authority as a local employer. They seek to employ and support the local market by advertising locally and attending any local events, when agencies are used for recruitment Ipsen have a policy of only using agencies that search for local talent.

A significant proportion of the 24 staff operating and occupying the facility at any given time will therefore be from inside the SAC catchment.

Useful Key Data about Ipsen Current Workforce on West Site over the Road

Total Staff employed at Ipsen currently = **468**: Current staff who are domiciled in Wrexham and immediate surrounding area = **198**

Therefore **42.3%** of the current Ipsen workforce are already served by residential connections to existing public or private sewers discharging within the SAC river catchment.

With Ipsen's local recruitment agenda we believe that when the facility is complete in 2025 the majority of the 24 new staff in occupation and required to operating this facility will live locally and therefore already be domiciled within the SAC area.

Fall Back Position

If the measures and mitigation described above is not considered sufficient to demonstrate that any effect on the SAC from the proposed development is insignificant in relation to phosphorus inputs, then the Applicant will incorporate phosphorus reduction technology in a private sewage treatment system for this new building which will then be installed and operated in accordance with the manufacturers specifications for the lifetime of the development. If consideration and quantification of this additional mitigation is required Ipsen would be very happy to enter into a dialogue with Planners, NRW and Welsh Water in this regard either during the planning determination period or as a Pre-Commencement Condition, should that be necessary.

NRW Response to PAC

In their response to the PAC dated 30.06.23 NRW have advised that in order to determine the application the LPA should be provided with further information as identified in their latest guidance/planning advice under the section titled "What does this mean for development proposals involving connection to public wastewater treatment works".

They have indicated that provided this advice is followed and the LPA are able to conclude that the development is not likely to have a significant effect on the SAC, the NRW would have no objection to the proposals.

In order to do that we understand that the LPA need to decide if both of the following are satisfied:

- the environmental permit for the associated wastewater treatment works has been reviewed against revised conservation objectives for water quality – *the relevant treatment works being Five Fords*
- there is capacity in place to accommodate the additional wastewater in compliance with revised permit limits.

NRW also state that in order that the LPA can consider this the developer/applicant should provide the following with the planning application.

- confirmation of how foul drainage will be managed
- scale plans showing the location of the nearest public sewer and proposed connection point

Both of the above have been provided with this planning application. The drainage strategy is set out in detail within Appendix 6 and includes reference to the on-going developer enquiry and in principle agreement from Welsh Water that they can accept the limited domestic flows from the development into their sewerage system on Ash Road South.

Appendices included under separate cover:

APPENDIX 3: TRANSPORT STATEMENT

Refer to report prepared by Axis, included separately

APPENDIX 4: PRELIMINARY ECOLOGICAL ASSESSMENT

Refer to report prepared by Cambrian Ecology Ltd., included separately

APPENDIX 5: ARBORICULTURAL IMPACT ASSESSMENT

Refer to report prepared by Tree 21, included separately

APPENDIX 6: FLOOD CONSEQUENCE ASSESSMENT AND DRAINAGE STRATEGY

Refer to report prepared by Landstudio, included separately

APPENDIX 7: GEOENVIRONMENTAL REPORT

Refer to report prepared by Groundsolve, included separately