



FI REAL ESTATE
MANAGEMENT

**plan
red**

PLANNING STATEMENT

Applicant: FI Real Estate Management Ltd

Application site: “Kingmoor” Land East of Bryn Land, Wrexham Industrial Estate
LL13 9UT

Proposed development: Hybrid planning application for (a) outline permission (all matters reserved except for means of access) for erection of up to 3 warehouse & distribution units (Use Class B8), including ancillary office accommodation, comprising up to 93,019 sqm net floorspace, service yards, car parking, HGV parking, internal circulation, landscaping and ancillary works; and (b) detailed permission for demolition, means of access, earthworks, drainage, landscaping, ecology zone and relative ecological mitigation measures, and ancillary works

APRIL 2023

DOCUMENT REFERENCE: FI006-01 v3A



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Appendix

Appendix 1 – EIA Screening Opinion

Appendix 2 – Heritage information



1 SUBMISSION DOCUMENTS

- 1.1 The Hybrid Planning Application is supported by a large number of documents which are drawn upon in the assessment of the proposals in this Statement. To assist these are listed below:

Submitted Drawings:

- * 1204-02-000 Rev P01 Existing Site Location Plan (“Red line plan”)
- 1204-02-001 Rev P4 Proposed 3 Unit Site Plan (“Proposed masterplan”)
- 1204-03-001 Rev P01 Unit 1 Proposed Floor Plans
- 1204-03-002 Rev P01 Unit 2 Proposed Floor Plans
- 1204-03-003 Rev P01 Unit 3 Proposed Floor Plans
- 1204-05-001 Rev P1 Unit 1 Proposed Elevations
- 1204-05-002 Rev P1 Unit 2 Proposed Elevations
- 1204-05-002 Rev P1 Unit 3 Proposed Elevations
- * KSW-BML-XX-XX-SK-C-0501 P05 High Level Drainage Strategy
- * P21066-100E Potential Access Strategy
- * P21066-101A Swept Path Access Analysis
- * WRE2206-PP.01 to PP.19 Rev-P4 Planting Plans and Schedule (20 no.)

[* denotes submitted for detailed approval, all others for illustration and will be subject to future reserved matter detailed design approval]

Submitted Documents:

- Air Quality Assessment (March 2023) v3, Wardell Armstrong
- Arboricultural Impact Assessment, MD Landscape
- Design and Access Statement 1204-InD-001, (March 2023), MCAU
- Drainage matters:
 - Drainage Strategy Rev P05, Bradley Marshall
 - Due Diligence Report: Geotechnical, Flood Risk & Drainage, Rev P01, Bradley Marshall



- Flood Consequence Report, Rev P01, Bradley Marshall
 - Operational & Maintenance Manual, Rev P04, Bradley Marshall
- Ecology matters (all authored or commissioned by UES):
 - Preliminary Ecological Appraisal, UES03448/01
 - Badger Activity Survey, UES03448/17 (confidential)
 - Badger Sett Closure Method Statement, UES03448/24 (confidential)
 - * Bat Activity Survey, UES03448/12
 - Bat Ground Level Tree Assessment, UES03448/06
 - Bat Aerial Tree Inspection Assessment & Presence / Absence Surveys, UES03448/16
 - Breeding Bird Survey, UES03448/11
 - Dingy Skipper Survey, UES03448/15
 - Great Crested Newt Impact Assessment, UES03448/07
 - Great Crested Newt Presence / Absence Survey & Population Size Class Assessment, UES03448/09
 - Great Created Newt Method Statement, UES03448/23
 - Pond PYSM Survey: Predistve System for Multimetrics, UES03448/14
 - Invertebrate Assessment for UES, Conops Entomology Ltd
 - National Vegetation Classification Survey, UES03448/13
 - Reptile Presence / Absence Survey, UES03448/08
 - Ecological Impact Assessment (“EcIA”), UES03448/22
- Employment Land Report, FI006-02 v3a, Plan Red
- Energy / BREEAM matters:
 - Low Zero Carbon (LZC) Report, LZC-ME-RPT-002 Rev A, NOVO
 - Indoor Air Quality Plan (March 2023), V0.1, Wardell Armstrong
- Heritage Information – Appendix 2 to Planning Statement, FI006-01 v3a, Plan Red
- Landscape Visual Impact Assessment, WRE2204_LVA01 Rev A, PGLA



- Noise Assessment Report, GM12034 v3a, Wardell Armstrong
- PAC Report, FI006-05 v1, Plan Red
- Phase 1 Assessment, S1761, 2021, SP Associates
- Planning Statement, FI006-01 v3a, Plan Red
- Social Values Statement, FI006-04 v2, FIREM
- Transport Assessment, P21066/TA, March 2023, Prime Transport
- Travel Plan, P21066/TP, March 2023, Prime Transport
- Waste Management Plan, FI006-03 v3a, Plan Red



2 INTRODUCTION

2.1 Plan Red has prepared this planning statement (“statement”) on behalf of FI Real Estate Management Ltd (“FIREM”) in support of its planning application for an employment development referred to as ‘Kingmoor.’

2.2 The planning application seeks hybrid planning application and has been made to Wrexham Council (“council”). The description of development is as follows:

Hybrid planning application for (a) outline permission (all matters reserved except for means of access) for erection of up to 3 warehouse & distribution units (Use Class B8), including ancillary office accommodation, comprising up to 93,019 sqm net floorspace, service yards, car parking, HGV parking, internal circulation, landscaping and ancillary works; and (b) detailed permission for demolition, means of access, earthworks, drainage, landscaping, ecology zone and relative ecological mitigation measures, and ancillary works.

2.3 The application site is located on land east of Bryn Lane, Wrexham Industrial Estate, Wrexham LL13 9UT (the “application site”) which is depicted in the accompanying drawings and site location plan.

2.4 The detailed elements of the planning application will cover the engineering works, installation of utilities and site access to prepare the site for future built development. The detailed element will also include the provision of large ecology mitigation zone and other landscape measures around the future development zone. There are two minor buildings on site which will be demolished through the detailed proposals.

2.5 The outline element will be for reserved matters on matters of appearance, landscaping, layout and scale related to the future development zone. Access to the site is for detailed approval, internal access will be a reserved matter.

2.6 Additional detail on the description of development and works is set out in Section 6.

2.7 The western area of the site was known as the former Owens Corning Fibreglass Site. Adopted UDP Policy E3 that identifies the site for employment development as part of the Wrexham Industrial Estate. We cover this and other relevant planning policy in Section 7 of the Statement.



- 2.8 By way of background to the proposed development and proposed planning application, FIREM has considered a number of employment development options for the site. In 2021, through Plan Red, FIREM sought pre-application advice from the council on a scheme for a single major employment unit at the site. This scheme was potentially for a range of employment uses in Use Classes B1, B2 and B8 as permitted by Policy E3.
- 2.9 Feedback provided by the council suggested that FIREM consider a scheme that comprised additional units. In its view this would better reflect local plan policy expectations. Following further viability and feasibility related work by FIREM a multi-unit scheme is now being proposed for the site.
- 2.10 As summarised above and described in Section 6 this application envisages a development of up to 3 large employment units, all in Use Class B8 (warehouse & distribution). As will be referred to elsewhere in this Statement and other documents the use of the units is commonly described as for 'logistics' within the industry but the formal Use Class does not use this terminology.
- 2.11 The scheme offers flexibility that the 3-unit scheme illustrated in the submission could be amended into a 2-unit scheme depending on market demand. The application also sets an upper limit to the combined floorspace whether as 2 or 3 units, and the floorspace can be lower but not greater than this figure.
- 2.12 By reason of the development being an industrial estate project on a site in excess of 5 hectares it was necessary for the proposal to be screened for whether it comprised EIA development for which an Environmental Statement would be required. A separate EIA screening exercise supported by a detailed Screening Report, prepared by Plan Red, was undertaken in parallel to the PAC process, supported by the supporting evidence of the application to draw its conclusions. The outcome of the EIA screening process was independent to PAC, as it was for the local planning authority, in consultation with statutory and non-statutory consultees, to provide its screening opinion. It was the position of Plan Red, the applicant and development team, set out in the EIA Screening Report that the development was not an EIA development. This was also the view of the local planning authority, confirmed through its formal EIA Screening Opinion to the applicant dated 20th January 2023.
- 2.13 The scope of the Statement is as follows:
- Section 3 provides background information on FIREM



- Section 4 introduces and sets out the potential employment and social value benefits of the proposed development
- Section 5 profiles the intended planning application site
- Section 6 profiles the proposed development
- Section 7 sets out the planning framework applying to the site
- Section 8 sets out PAC and EIA screening processes
- Section 9 sets out our assessment of the proposed development by reference to usual planning, development and land use topics
- Section 10 sets out conclusions



3 ABOUT FIREM

- 3.1 FIREM was established 40 years ago. It is an experienced developer that provides workspace, asset and property management services. Most of its employment related schemes once developed and completed are then added to its diverse investment portfolio, which includes industrial, office, retail and residential premises.
- 3.2 FIREM's guiding principle is that every property related intervention and action creates the opportunity to create better quality floorspace and buildings and generate value. Its property development arm was established to focus on creating places of quality and distinction which offer opportunity and reflect its commitment to excellence. Its team specialises in large-scale single-use or mixed-use developments and a separate construction arm has recently been set up.
- 3.3 As a responsible developer, FIREM works closely with local authorities, its partners and communities to ensure a cohesive and quality approach is taken to all of its projects. It is also committed to deliver social values through its developments and where possible to do likewise regarding the Government's commitment to achieve levelling up. These topic areas are considered in more detail in the following section.
- 3.4 FIREM currently asset and property manage many hundreds of thousands of square metres of industrial and commercial property and floorspace and is adding to this monthly through new developments and acquisitions.
- 3.5 FIREM has a number of existing assets and sites within the Wrexham Industrial Estate which are occupied, under-construction or subject to on-going or planned development schemes.



4 EMPLOYMENT AND SOCIAL VALUE BENEFITS

Employment Land Considerations

- 4.1 A separate Employment Land Report supports the application. The Report has been prepared by Plan Red with input of FIREM and its team of national and local commercial agent advisors.
- 4.2 The Report considers matters such as local employment land and floorspace supply, need and demand for additional employment land and floorspace, including types of units, and a number of related matters. This extends to covering the need for a unit of the form and scale proposed under the envisaged planning application and at WIE. The Report also draws upon the evidence base to the LDP.
- 4.3 Conclusions on its findings can be read at Section 9 in the Report.

Possible Employment Generation

- 4.4 The site though allocated for employment development is currently undeveloped and therefore offers no employment or economic benefit.
- 4.5 As we go onto describe in Section 6, the proposed development could deliver 3-units with a floorspace profile as follows:
- Unit 1 - 19,335 sqm (208,125 sqft)
 - Unit 2 - 21,425 sqm (230,625 sqft)
 - Unit 3 - 52,257 sqm (562,500 sqft)
 - Total - 93,019 sqm (1,001,250 sqft)
- 4.6 Potential full-time equivalent (FTE) job creation from the proposals is calculated as up to 1,033 FTE jobs, based on 1 FTE per 90 sqm. This is a lesser ratio by around 25% reduction than the Employment Density Guide would suggest¹. It is our experience that these

¹ Source: Employment Density Guide, 3rd Edition, HCA (2015) - sets multipliers of FTE job creation by floorspace and use – B8 uses 1 FTE per 70 sqm



multipliers typically apply to small to medium sized units and larger bespoke units as proposed here generally deliver a lesser ratio of employment per sqm of floorspace.

- 4.7 As with the outline nature of the proposals should the detailed consent lead to a lower final floorspace a lower potential employment figure would result.
- 4.8 The number of new jobs and related economic benefits is a material consideration in support of the proposals.

Social Values & Contribution Towards LUF Related Initiatives

- 4.9 In addition to the employment and economic benefits set out above, FIREM sees there to be very good opportunities to benefit local communities where it owns properties and hopes to develop new floorspace. This is through the potential to deliver a range of Social Values (“SVs”) and opportunities linked to the key objectives of the Government’s Levelling Up Fund initiative (“LUF”).
- 4.10 A separate Social Values Statement has is submitted on this topic in support of the application. The Statement sets out FIREM’s commitment to work with local authorities and their partners to deliver a range of Social Values and opportunities linked to the key objectives of the Government’s LUF initiative.
- 4.11 The contents of the Statement stand as FIREM’s draft Statement of Intent to work with the council to deliver social value and contribute towards LUF objectives. It sets out possible opportunities linked to key policy objectives and initiatives that draw from a wide range of social, economic and environmental targets with thoughts on specific initiatives outlined relevant to the proposals.
- 4.12 As delivery of initiatives requires partnership with a variety of bodies, including the council, and often in parallel to planning, FIREM welcomes engagement with officers on these matters.
- 4.13 As set out in the previous section, FIREM was established 40 years ago. It is an experienced developer that provides workspace, asset and property management services. Most of its employment related schemes once developed and completed are then added to its diverse investment portfolio, which includes industrial, office, retail and residential premises. FIREM’s guiding principle is that every property related intervention and action creates the opportunity to create better quality floorspace and buildings and generate value.



- 4.14 Its property development arm was established to focus on creating places of quality and distinction which offer opportunity and reflect its commitment to excellence. Its team specialises in large-scale single-use or mixed-use developments and a separate construction arm has recently been set up.
- 4.15 As a responsible developer, FIREM works closely with local authorities, its partners and communities to ensure a cohesive and quality approach is taken to all of its projects. It is also committed to deliver social values through its developments and where possible to do likewise regarding the Government's commitment to achieve levelling up. These topic areas are considered in more detail in the following section.
- 4.16 FIREM currently asset and property manage many hundreds of thousands of square metres of industrial and commercial property and floorspace and is adding to this monthly through new developments and acquisitions.
- 4.17 FIREM has a number of existing assets and sites within the Wrexham Industrial Estate which are occupied, under-construction or subject to on-going or planned development schemes.

5 PLANNING APPLICATION SITE

Site Location

- 5.1 The site address is given as Land East of Bryn Lane, Wrexham Industrial Estate, Wrexham LL13 9UT.
- 5.2 Figure 1 illustrates the broad location and Figure 2 the application site boundary.



Figure 1: Broad site location



Figure 2: Site Location Plan (extract)



Site area

- 5.3 The application site area extends to 25.4 hectares (62.8 acres).
- 5.4 Relevant to the hybrid application is to distinguish that 13.9 hectares will form the outline planning area for the future built development, including parking, service yards, internal access roads and landscaping.
- 5.5 The residual 11.5 hectares will provide an 'ecological zone' as described in submitted drawings which includes land around the built area and an area referred to the Eastern Fields / Ecology Zone. The Eastern Fields itself extends to circa 4.2 hectares and comprises two linked fields.

Site context

- 5.6 The site is located on the eastern fringes of Wrexham Industrial Estate ("WIE") and to the east of Bryn Lane and west of the B5130. This is approximately 5 km (3 miles) west from Wrexham town centre. WIE was developed during World War II as munitions factory. Post-war the estate was transformed from a military site to a peacetime facility for industrial and employment uses. It has since grown to cover approximately 550 hectares (1,359 acres) and is the largest industrial estate in Wales second in the UK after Trafford Park in Manchester. The estate consists of standalone industrial sites, industrial estates and business parks.
- 5.7 Clockwise from the north the site is bounded by the recently built Net World Sports logistics warehouse (Use Class B8); to northeast is agricultural land; to east is the B5130 with scattered residential properties in a ribbon development along the road with further homes to east forming Isycoed, with agricultural fields beyond; to south east is agricultural land; to south is a large logistics warehouse operated by Very; to south west is agricultural land subject to planning application for two industrial buildings for B2 & B8 uses (application reference P/2022/0017) and to east across Bryn Lane is the extensive Kellogg's factory complex.
- 5.8 The proposed developable area of the application site excludes the Eastern Fields, meaning nearest homes on the B5130 are over ¼ kilometre away, but with some gardens adjoining the Eastern Fields boundary.

Site Profile

- 5.9 The 25.4 ha site is a predominantly a greenfield site, with approximately 3ha of previously developed land to west and south (central) areas related to a former Owens Corning factory and existing hardstanding areas. Other than these areas the site is in agricultural use. The site is divided into several fields by a mix of hedgerow, ditch and trees along field boundaries. Several existing ponds exist within the central area of the site. A more substantive linear scrub and tree feature is present along the northern site boundary which follows the alignment of an existing watercourse.
- 5.10 The historic boundaries of the former Owens Corning fibreglass factory extended across the western and central areas of the site as illustrated in Figure 3, circa 14.5 hectares. The main factory buildings being to the south of the site boundary in the location of the Very warehouse.

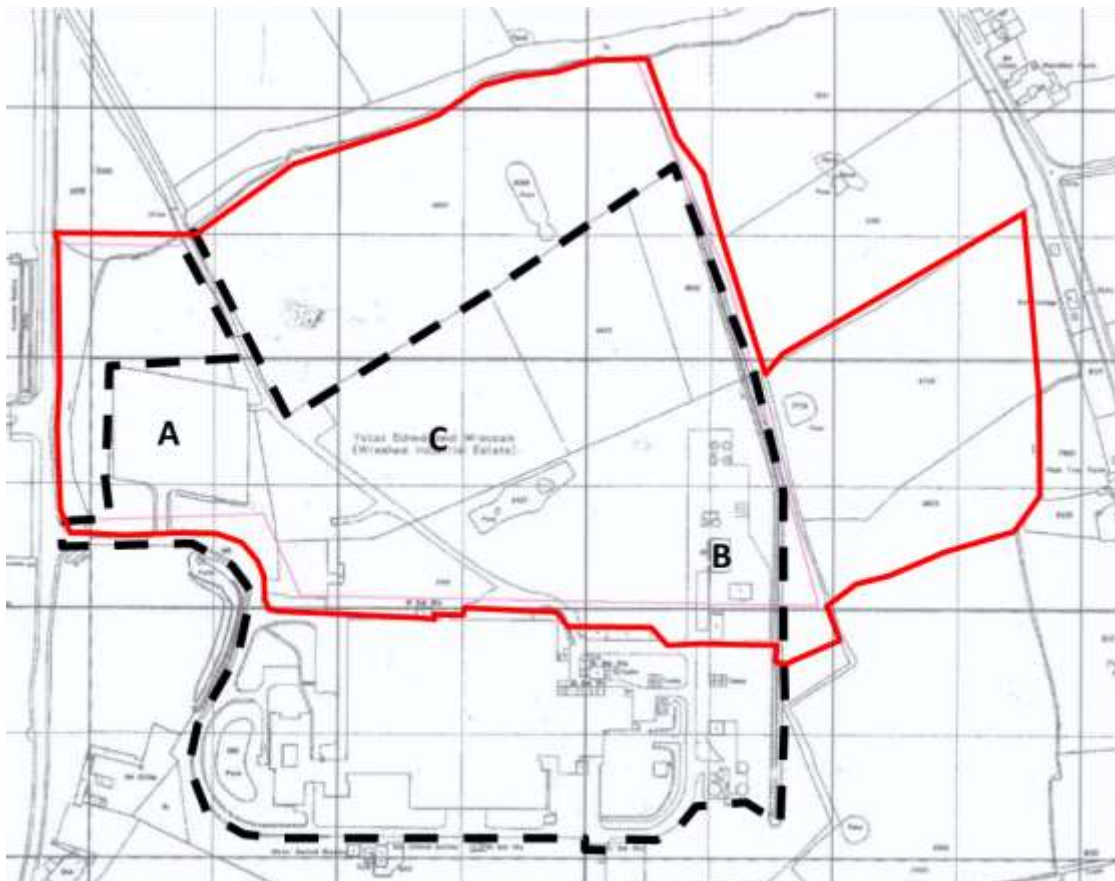


Figure 3: Approximate extent of the Former Owens Corning Fibreglass Factory (OS base 1992, source: SPA Phase 1 Assessment)

- 5.11 As Figure 3 shows the previously developed extents now extant relate to the former staff car park (A) and area of since demolished silos (B). The area (C) is understood to have been the location of sports fields provided for staff. It is inconclusive if the field to its north was also part of this area or not.
- 5.12 Area (A) is still a secure parking compound, but area (B) now comprises a raised area of scrub grassland with spoil mounds. The terrain is broadly level and the central pond between these two areas which was present in 1992 is now joined by further ponds to east and west on site. With exception of the two ponds the former factory area is now fields, divided by hedgerows. The terrain gently slopes down to the north-east towards a pond in the north-eastern area. A ditch and an overgrown hedgerow form the eastern boundary of the former Owens Corning fibreglass factory complex. The ditch-water flows into the small brook immediately to the north of the site.
- 5.13 The 'Eastern Fields' were never part of the former complex and is in agricultural use (pasture) and is in fact separated into two fields. The terrain is generally level.
- 5.14 The main part of the site is bounded along its northern extents by a small brook. Immediately beyond the brook to the north is a woodland belt. This tree belt contains a number of trees which are collectively subject to a single Tree Preservation Order (TPO). This boundary feature and the overgrown hedgerow along the eastern boundary provide some visual containment at ground level.
- 5.15 The Design and Access Statement prepared by MCAU includes a fuller site description and a number of aerial photographs of the site. We provide a selection of street view images below of the site (Photographs 1 to 4).



Photo 1: Existing vehicular access into the site off Bryn Lane looking east, site to the left of access road



Photo 2: Looking north eastward across the western area of the site from the Bryn Lane access



Photo 3: View west from B5130 toward eastern site boundary (distant tree/ hedge line), Very warehouse visible to left hand side on horizon



Photo 4: Looking south towards northern fringes of site from Ridley Wood Road (Net World Sports unit under-construction to right of frame)

Additional photographs of the surrounding area and views toward the site are set out in the Landscape Visual Impact Assessment; internal site photographs and aerial views are provided in the Design and Access Statement. Detailed photographs of ecological features are provided across the ecological statements prepared by UES.



Surrounding Land Uses

- 5.16 To the west on the other side of Bryn Lane is a large operational Kellogg's Factory (Class B2 Use). To the north is the recently built Net World Sports logistics warehouse (Class B8 Use). To the east is a combination of agricultural land and sporadic ribbon development along B5130 as is part of Isycoed which extends to the west. To the south and accessed off a shared access lane is an industrial unit/complex operated by Very Group Ltd (Class B8 Use). And land immediately south of the access road is a proposed site for 2no. industrial buildings (Class B2 and B8), current planning application P/2022/0017.

Topography

- 5.17 Though there is undulation the site is generally level and lies at approximately 28m AOD.

Drainage and Flood Risk

- 5.18 The site is not in a location of flood risk as set out in the Flood Risk Consequences statement.

Access

- 5.19 Access is via Bryn Lane to the west, which links into the wider distribution roads of Wrexham Industrial Estate.



Planning History

5.20 Setting aside the former use of part of the site for Owens Corning Fibreglass Factory, which we consider non-relevant, there are two planning decisions of relevance, a 2010 outline permission and a 2017 Development Consent Order (DCO).

5.21 A third pending application to the south of the site is also noted.

P/2008/0993 – Site 3B Warehouse permission

5.22 Granted on appeal (APP/H6955/A/09/2113258) in 2010, outline permission for a B2/B8 unit was granted on the site referred to as Site 3B which correlates to the development area for this application. Granted in outline (siting and means of access), the illustrated building was for a 250,000 sq ft unit with option of a further 250,000 sq ft extension (see drawing extracts, Figure 4 overleaf).

5.23 In the Inspector's decision (IR52) he refused a unit in the area 3A to the north, now occupied by Net World Sports, but allowed the unit at 3B, making a distinction in consideration of landscape impact that though both units even with mitigation would have a significant impact on the landscape, that; *'Such a change would be less apparent, and less harmful, on the southern section where Unit 3B is proposed. The woodland belt would be an effective screen and visual barrier which already visually contains the southern section visually, ensures that it is considerably less open to view and reinforces its relationship with nearby elements of the WIE.'*

5.24 The application was not implemented and as commented on the northern Site 3A has since been developed by Net World Sport for a not dissimilar scale of development. Notably, since the 2010 decision, matters in the preparation of the LDP have changed the underlying planning policy in formally bringing both areas into the defined Industrial Estate area.

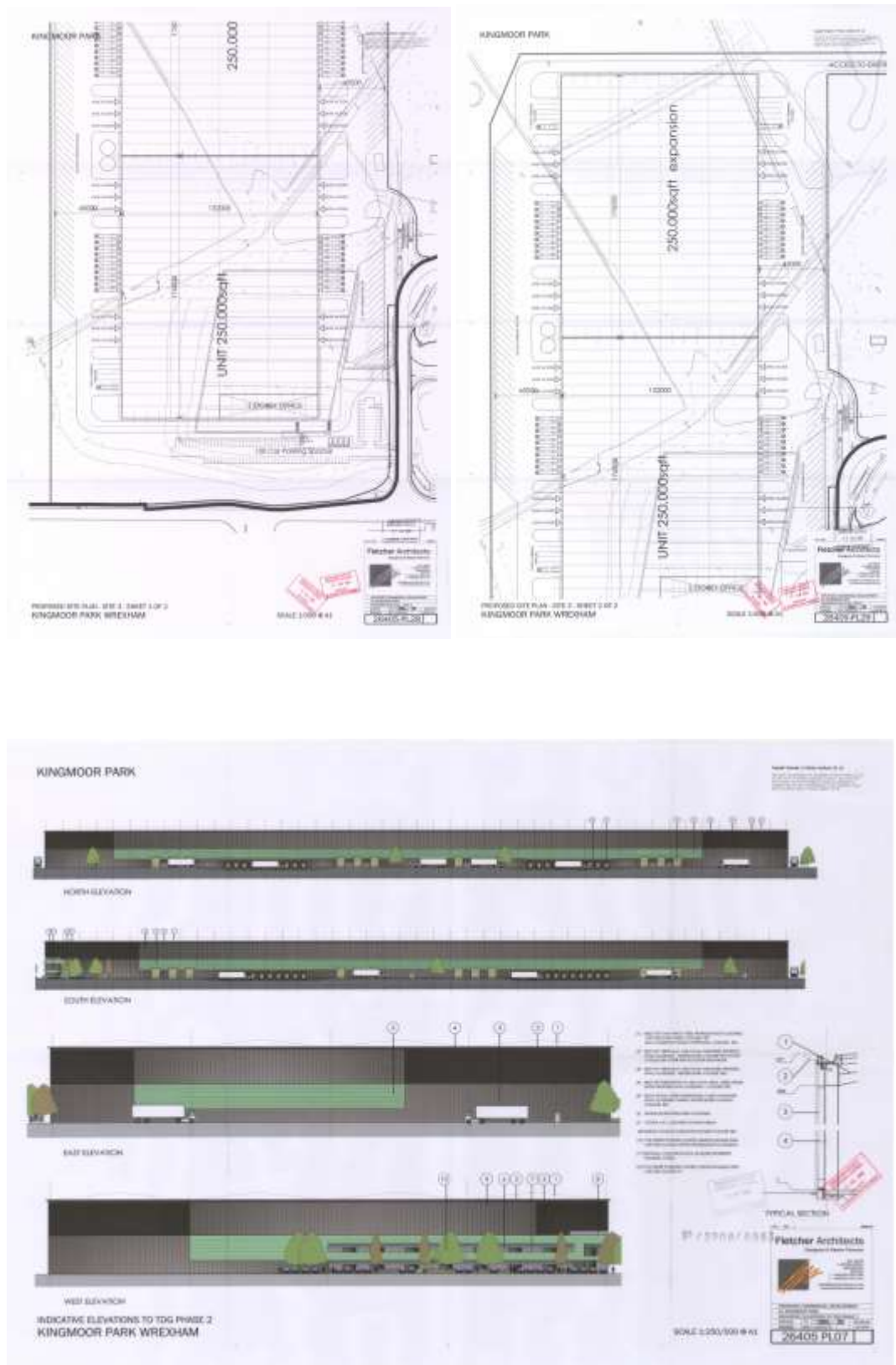


Figure 4: Extract drawings from permission P/2008/0993 relating to Site 3B

DCO Wrexham Power Ltd

- 5.25 The site was the subject of a National Strategic Infrastructure Project (“NSIP”) application made in March 2016. The applicant was Wrexham Power Ltd. The NSIP sought permission for a gas fired electricity generating power station. The NSIP application was approved and the Development Consent Order (“DCO”) pursuant to it was confirmed in August 2017. The DCO grants planning permission for the construction of the proposed development and powers to acquire land and rights at the site. The DCO lapsed in July 2022.
- 5.26 The development area was broadly to the western half of the proposed built area in this application, but with significant invasive pipeline connections extending away from this area. The scale of development included buildings of circa 25m in height and stacks rising to 50m.

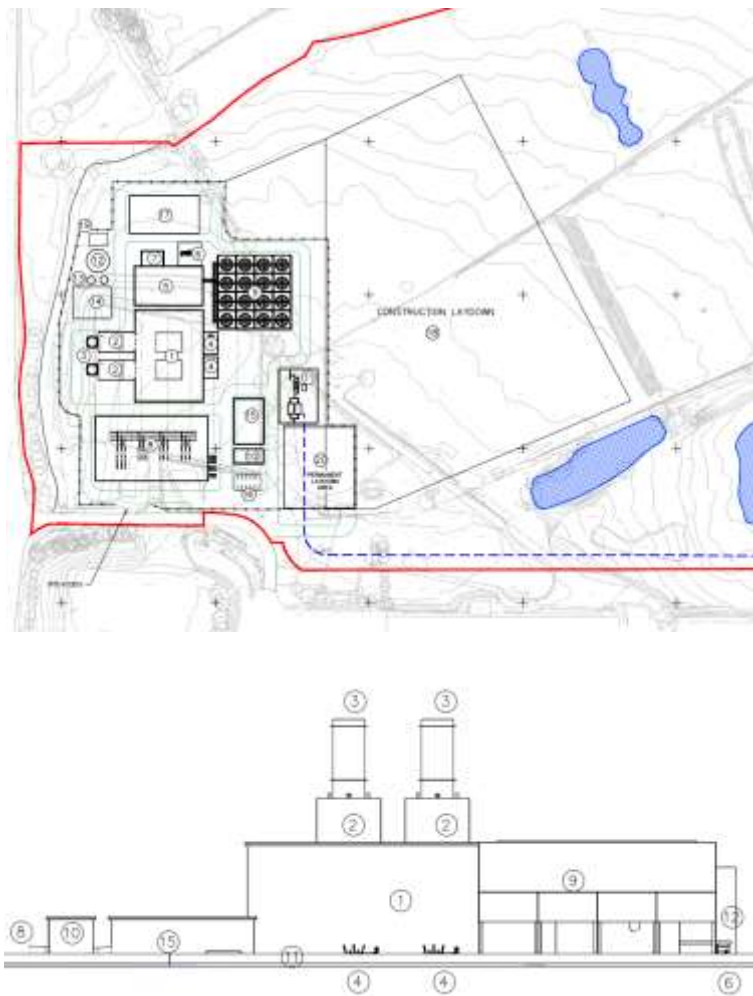


Figure 5: Extract DCO application proposals

Application P/2022/0017 Land East of Bryn Lane (south of site)

- 5.27 Though this application does not relate to the application site it is a pending application located to the south. It proposes development of 2no. industrial units (Class B2 or B8 Use). The northern of the two units (Unit 1) would receive its access off the same shared access to the Very Group Ltd site and to this planning application proposal. The southern unit would have a separate access directly off Bryn Lane to the south. See drawing extract in Figure 6.
- 5.28 The application has not been determined at time of both the PAC and submission of this application. For purpose of assessment, including matters of trip generation and traffic movements, it has been treated as a committed development.

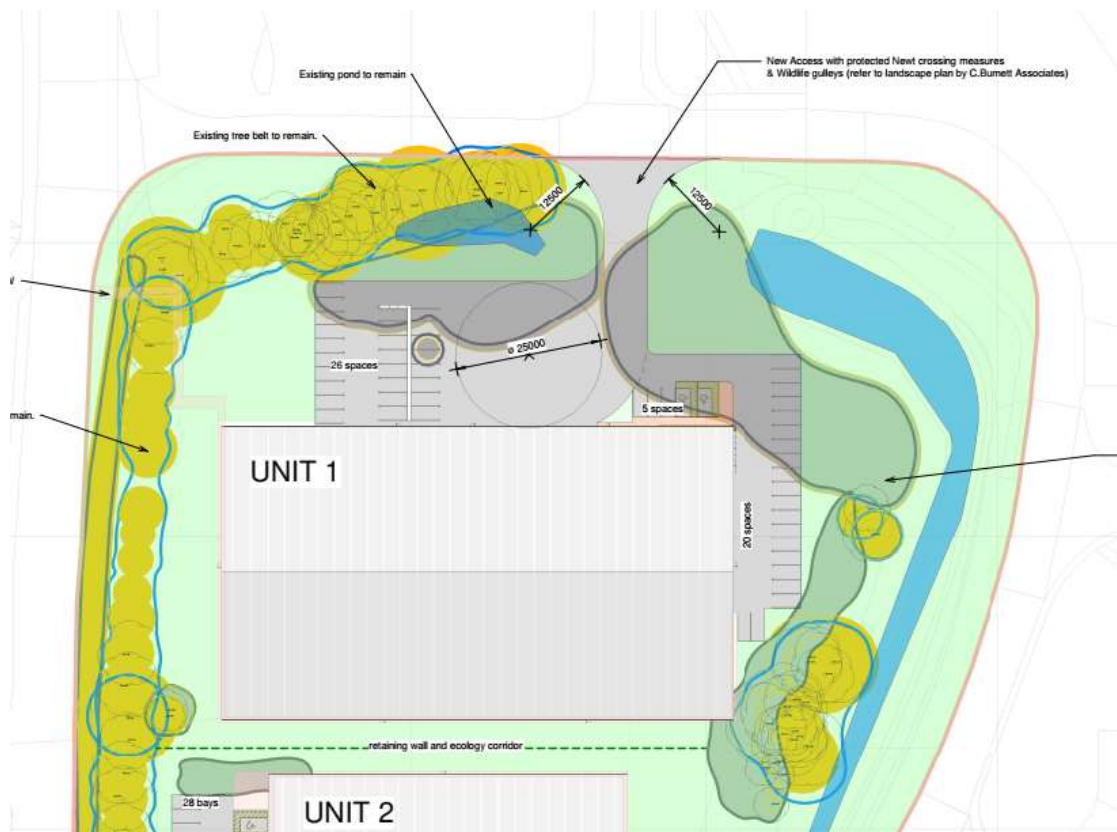


Figure 6: Extract Proposed Site Plan – application P/2022/0017



6 PROPOSED DEVELOPMENT

6.1 The Design and Access Statement and accompanying application drawings, prepared by MCAU, describe and present full details of the proposals.

6.2 The planning application describes the proposed development as follows:

Hybrid planning application for (a) outline permission (all matters reserved except for means of access) for erection of up to 3 warehouse & distribution units (Use Class B8), including ancillary office accommodation, comprising up to 93,019 sqm net floorspace, service yards, car parking, HGV parking, internal circulation, landscaping and ancillary works; and (b) detailed permission for demolition, means of access, earthworks, drainage, landscaping, ecology zone and relative ecological mitigation measures, and ancillary works.

Scheme overview

6.3 Key elements of the proposed development are set out below. We set out the outline and detailed elements in a later sub-section:

- Warehouse development (Use Class B8) for up to 93,019 sqm across 2 or 3 warehouse buildings (illustrative masterplan as submitted is a 3-unit scheme, drawing 1204-02-001 Proposed 3 Unit Site Plan); all details bar means of access to be reserved.
- Each unit to be provided with associated car parking, servicing, internal circulation off a single shared access taken off Bryn Lane
- Combined built development area to be approximately 13.9 ha (relating to the outline planning area), all situated within the defined boundary of Wrexham Industrial Estate (Policy SP10)
- Non-built development to extend to approximately 11.5 ha, including ecological zone provided in the 'Eastern Fields'
- Demolition relates to two minor buildings on site (ex-Owens Corning factory) to facilitate development
- Preparatory works (full permission) include removal of existing hardstanding and existing ponds (identified in EcIA, Appendix 2 PEA as ponds P1, P2, P3 and P4) to permit cut/fill to prepare development platform.



- Preparatory works will include sustainable urban drainage measures, including swales, and provision of ecological mitigation measures
- Site wide landscaping will be applied in detail to western, northern, southern (central) boundaries around the built area as part the detailed permission, and to land to the east ('Eastern Fields'). Landscaping within the built area (outline permission) will be a reserved matter.
- Ecological mitigation measures (retention, enhancement and provision) will be delivered through the detailed permission including the 'Eastern Fields' ecological zone. This will provide compensatory ponds and habitat for Great Crested Newts, as well as habitats for a range of other species.

Details of proposed planting is set out in drawing (series) WRE2206-PP01-P4 Planting Plans and Schedules. This is developed from the findings of the UES ecology reports, the EcIA is a suitable entry point to obtain an overview.

Note ecological mitigation measures in the detailed permission are not confined to the Eastern Fields but incorporate land between proposed buildings and southern site boundary (Very Group Ltd) and to eastern, northern and western site boundaries around the built development area.

6.4 The proposed built development for which outline permission, all matters reserved except means of access, is sought, will have the following attributes, based on the 3-unit scheme illustrated (1204-02-001 Proposed 3 Unit Site Plan, extract as Figure 4 overleaf):

- Unit 1 – Use Class B8 warehouse & distribution – 19,335 sqm net floorspace, including ancillary office space and mezzanine; footprint 17,187 sqm
- Unit 2 – Use Class B8 warehouse & distribution – 21,425 sqm net floorspace, including ancillary office space and mezzanine; footprint 19,045 sqm
- Unit 3 – Use Class B8 warehouse & distribution – 52,257 sqm net floorspace, including ancillary office space and mezzanine; footprint 49,451 sqm

6.5 If a two-unit scheme is delivered, which we seek as an option under the outline consent, then the combined floorspace will still not exceed 93,019 sqm net, and no single unit will be permitted to exceed the scale of Unit 3 (52,257 sqm net floorspace / 46,451 sqm footprint). This will be secured through a relevant planning condition(s) to the outline permission.



Figure 7: Extract drawing 1204-02-001 Proposed 3 Unit Site Plan

6.6 Common to the illustrated 3-unit scheme or to a potential 2 unit scheme:

- Building heights (parameter) will not exceed 30m to ridgeline with 25m clearance to haunch to permit installation of high-bay racking systems internally
- External appearance (reserved matter) is proposed as profiled sheet cladding, glazing to office / entrance, roller shutter doors to service / loading bays in colour to be determined to achieve a minimal visual impact on the skyline
- Each unit will be provided with a dedicated service yard, HGV parking / service bays, car parking and access off the internal circulate road
- Proposed means of access will be via a new junction taken north off the existing access east of Bryn Lane

6.7 Total car parking provision is proposed at 654 spaces based on the illustrated 3-unit scheme. By unit this will be:

- Unit 1 – 175 parking spaces, including 18 accessible spaces (10%)
- Unit 2 – 183 parking spaces, including 18 accessible spaces (10%)
- Unit 3 – 296 parking spaces, including 30 accessible spaces (10%)



Hybrid application

- 6.8 The application is hybrid in composition and seeks part outline and part detailed planning permission. How the elements summarised earlier will be dealt with, i.e., in outline or detailed form, is as follows:

Part (a) outline elements

- Outline permission is sought for appearance, layout, landscape and scale relating to the 13.9 ha area that will contain the built-development form, means of access is for approval as the internal access linking back to Bryn Lane
- Permission for Use Class B8 (warehouse & distribution) only
- Outline elements will include internal estate road to link units to the means of access, car parking per unit, service yards and ancillary uses / areas associated with each unit
- Landscaping within the outline area is a reserved matter, though for purpose of presenting the application the submitted drawings WRE2206-PP01-P4 Planting Plans and Schedules include the outline area for information / context
- Scale will be controlled through planning condition to limit height to 30m for all units, and 25m to haunch
- Layout will be controlled through planning condition to provide upper limits to floorspace and footprint for each unit, or combination if a 2-unit scheme is pursued

Part (b) detailed elements

- Demolition of two minor buildings
- New means of access off the existing access toward Bryn Lane
- Earthworks, cut and fill, and associated engineering to prepare a build platform
- Provision of utilities, services and drainage – including sustainable drainage features to serve the future built development
- All landscaping outwith the built area (outline)
- All ecological mitigation measures, including ecology mitigation zone in Eastern Fields



Ecological mitigation

- 6.9 The ecological mitigation will of itself comprise of a series of inter-related works for the trapping and translocation of newts within the main development area (subject to permission and licence), and other habitat formation, retention and enhancement measures. This is a key element in the development programme and following review of potential phasing and timescales it is intended to submit a separate, discrete ecology enabling works application relating to the Eastern Fields to ensure the site can be brought to a relevant state of preparedness ahead of translocation of newts. *The programme and phasing issues are set out within the separate support statement to the ecology enabling application.*

Phasing

- 6.10 Based on the 3 unit scheme the anticipated phasing is:
- Phase 1a – preparation / safeguarding of ecological mitigation zones
 - Phase 1b – undertaking of translocation of great crested newts under licence
 - Phase 2a – site clearance of land to west / central, earthworks to create development platforms, formation of new means of access, installation of drainage and utilities, landscaping
 - Phase 2b – subject to future Reserved Matters approval, the construction of Unit 3 (including erection of building, formation of service yard, car parking and ancillary works)
 - Phase 3 – construction of Units 1 and 2 (including erection of building, formation of service yard, car parking and ancillary works)
- 6.11 A variation on the phasing delivery may arise if Phase 3 is separated into the construction of Units 1 and 2 separately, i.e. as Phases 3a and 3b, or Phase 3 is for a single, combined unit as a 2-unit scheme.

Design

- 6.12 The design of the units including elevational details and likely materials has not yet been designed or defined. We can confirm that the new units will be modern in character and appearance and typical of modern employment units of this ilk. The Design and Access Statement and associated drawings and images provide details.



7 PLANNING FRAMEWORK

Background

- 7.1 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.
- 7.2 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.
- 7.3 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.
- 7.4 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.

Presenting Policy

- 7.5 Although the decision-making framework places great emphasis on the development plan in development management decisions we present relevant planning policy in a top down approach, i.e., national planning policy first followed by development plan policy. This is because development plans take their lead from national planning policy.

National Planning Policy

Planning Policy Wales, 11th Edition 2021

- 7.6 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.
- 7.7 At paragraph 1.2 PPW11 confirms that its primary objective 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. A well-functioning



planning system is fundamental for sustainable development and achieving sustainable places.

- 7.8 At paragraph 1.11 PPW11 deals with the well-being of Future Generations, which is a fundamental aim of policy. The Well-being of Future Generations (Wales) Act, 2015 places a duty on public bodies to carry out sustainable development.
- 7.9 A key aim of PPW11 is to achieve successful placemaking. It confirms at paragraph 2.8 that planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales. 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.
- 7.10 A key guiding principle, which applies to economic development (Figure 4, page 17), is achieving the right development in the right place which extends to growing the Welsh economy in a sustainable manner. The planning system should enable development which contributes to long term economic well-being, making the best use of existing infrastructure and planning for new supporting infrastructure and services.
- 7.11 Section 5 deals inter alia with economic development like that proposed under the planning application. It confirms at paragraph 5.4.1 that the Government defines economic development, least for planning purposes, as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses.
- 7.12 At paragraph 5.4.2, PPW11 confirms 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. The Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim. Similarly, growth in innovative, emerging technology and high value-added sectors such as advanced engineering, renewable and low carbon energy, digital and bio-technology sectors are also strongly supported. Development plans should consider the role these sectors may play in terms of investment and job creation in their area. This section focuses primarily on traditional



employment land uses (B1, B2 and B8) while policies on other economic sectors are found elsewhere in this chapter and other parts of PPW11.

- 7.13 At paragraph 5.4.3, PPW11 confirms that local planning authorities should support the provision of sufficient land to meet the needs of the employment market at both a strategic and local level. Development plans should identify employment land requirements, allocate an appropriate mix of sites to meet need and provide a framework for the protection of existing employment sites of strategic and local importance. At paragraph 5.4.4 PPW11 advises that, wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration. Sites identified for employment use in a development plan should be protected from inappropriate development.

Technical Advice Notes

- 7.14 TAN5: Nature Conservation and Planning (September 2009) – Provides advice on how the land use planning system can and should protect and enhance biodiversity and geological conservation. The guidance emphasises that biodiversity and nature conservation may have local, national and international obligations that interact with the planning system.
- 7.15 TAN 11: Noise (October 1997) - Local planning authorities must ensure that noise generating development does not cause an unacceptable degree of disturbance. They should also bear in mind that if subsequent intensification or change of use results in greater intrusion, consideration should be given to the use of appropriate conditions.
- 7.16 TAN 12: Design (March 2016) - This TAN notes that the Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment which is fit for purpose and delivers environmental sustainability, economic development and social inclusion, at every scale throughout Wales.
- 7.17 TAN 15: Development and Flood Risk (November 2021) - This planning advice note should be read in conjunction with PPW11 and other technical advice notes. The TAN provides technical guidance which supplements the policy set out in PPW11 in relation to development and flooding, and inter-related drainage issues that may arise from additional run-off from development.



- 7.18 TAN 18: Transport (March 2007) - The TAN notes that an efficient and sustainable transport system is a requirement for a modern, prosperous and inclusive society. On major travel generating uses, the TAN notes that the location of major travel generating uses, including employment, can significantly influence the number and length of journeys, journey mode and the potential for multi-purpose trips. Development plans should seek wherever possible to identify locations for appropriate developments.
- 7.19 TAN 21: Waste (February 2017) -The TAN confirms that, when considering development proposals for all types of waste management facilities, planning authorities should take into account their potential contribution to the objectives, principles and strategic waste assessments set out in Towards Zero Waste and the relevant waste sector plans and the relevant development plan for the area.
- 7.20 TAN 23: Economic Development (February 2014) - The TAN confirms that PPW11 advises that planning for economic land uses should aim to provide the land that the market requires, unless there are good reasons to the contrary. Where markets work well, this will help maximise economic efficiency and growth. Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development.

Development Plan

- 7.21 Since completion of PAC the Council has received the binding Inspector's Report, dated 27th February 2023, on its Local Development Plan 2 (LDP2) and now intends to adopt the plan subject to ratification scheduled to be dealt with on 19th April 2023. In expectation of ratification the policy section now excludes comment on what will soon become former UDP policies.

Wrexham Local Development Plan ("LDP")

- 7.22 To follow is a list of the policies considered relevant to the site, its surroundings and the proposed development in the determination of the application.
- 7.23 The key policy is SP10: Wrexham Industrial Estate. This policy confirms that allocated land will be the primary focus for new employment development (Class B Uses) in the Borough over the plan period. Land is also protected on the estate for a strategic ecological network for a number of protected species and habitat and as such is allocated

for employment development. Figure 6 (overleaf) provides extract from the Proposals Map with the site highlighted.

- 7.24 The eastern fields within the red line boundary are excluded from the allocation SP10. The site includes on is northern and part eastern boundary, and within the southern central area, designation of the Strategic Ecological Network (SP10). As can be seen the designation does not follow, particularly to the southern area, any clear feature. The concept of the approach has been subject of pre-application to present a structure that better fits the site, a development proposal and existing natural features. This has been variously set out in Sections 5, 6 and 9 to provide the background, the development proposal and the policy response respectively.

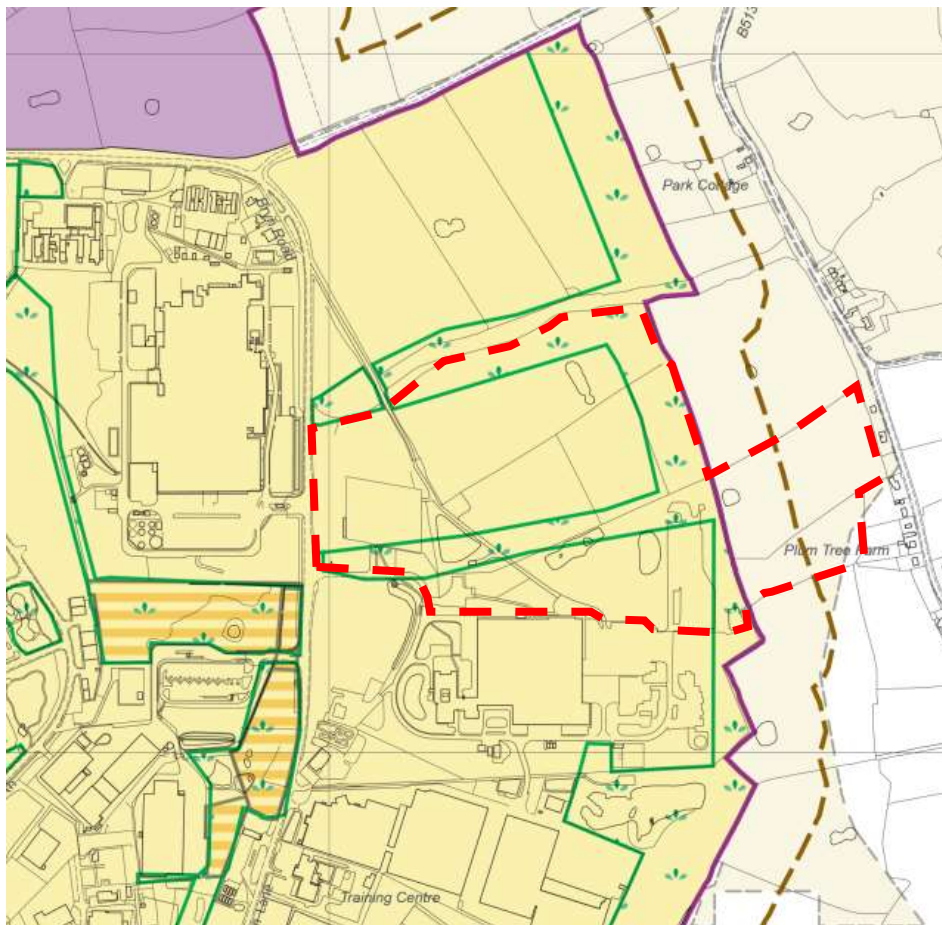


Figure 8: Extract LDP Proposals Map (site highlighted)



7.25 The following LDP policies are considered relevant to the proposals:

- SP2 Location of New Development
- SP6 Planning Obligations
- SP9 Economic Growth, Employment and Enterprise
- SP10 Wrexham Industrial Estate; including WIE Strategic Ecological Network
- SP12 Transport and Accessibility
- SP13 Design Principles
- SP15 Natural Environment
- SP19 Climate Change
- SP20 Green Infrastructure
- DM1 Development Management Considerations
- NE1 International and National Nature Conservation Designations
- NE2 Local Designations for Nature Conservation and Geological Importance
- NE3 Trees Woodlands and Hedgerows
- NE6 Waste Water Treatment and River Water Quality
- EM1 Protection of Existing Employment Land
- T1 Managing Transport Impacts
- T2 Active Travel
- RE1 Development and Renewable Energy

Planning guidance

7.26 A range of local planning guidance notes have been prepared by the Council which are subject to sporadic review, and it is noted that on adoption of the LDP the guidance will technically no longer be supporting adopted policy, thereby lessening the weight to be attributed to it. Nonetheless we reference guidance in our planning assessment (Section 9) including matters of cycling (LPG 15), parking standards (LPG 16), biodiversity and employment (LPG 29) amongst others.



8 PAC AND EIA SCREENING

Pre-Application Consultation (PAC)

- 8.1 The duty for this is imposed by section 61Z of the *Town and Country Planning Act 1990*. Further provision is contained in Part 1A of the *Town and Country Planning (Development Management Procedure) (Wales) Order 2012* (“Order”). Guidance is also provided by the Welsh Government in the ‘New Development Management Procedures’ letter issued in February 2016.
- 8.2 PAC was required because the proposed development falls within the category of ‘*major development*’ as set out in the Order.
- 8.3 The PAC Report provides more details on the process, consultation replies and response.

EIA Screening

- 8.4 An EIA screening application was under the *Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017* (“the EIA Regulations”) to the Council on 9th December 2022. The screening opinion is sought because the development falls within Schedule 2 of the EIA Regulations.
- 8.5 As already confirmed, the Council adopted its Screening Opinion on 20th January 2023, and this concluded that the proposed development proposal was a non-EIA development.
- 8.6 A copy of its EIA Screening Opinion (reference ENQ/2022/0353) is provided as Appendix 1.



9 PLANNING ASSESSMENT

Principle of development

- 9.1 The site, with notable exception of the Eastern Fields, is located inside the confines of Wrexham Industrial Estate (“WIE”) and is designated for employment use in the LDP2 through Policy SP10. Policy SP2 emphasises the importance of WIE nationally / regionally in the Wales Spatial Plan (2008) as an employment area, and notes that the WIE was responsible for up to 80% of employment land take-up in the borough since 2006.
- 9.2 The application site (excluding the Eastern Fields) was formally an allocation in the UDP as a “Large Single User Employment Site,” Policy E3, in combination with land to the north since developed for Net World Sports distribution warehouse. The land of the former allocation is now simply identified as part of the WIE designation.
- 9.3 Policies SP9 (economic growth) and SP10 (WIE) combine to support and maintain the WIE area in addition to a strategic allocation to expand the WIE to the north (KSS3 Employment Allocation). In some respects this is not dissimilar to the position in the former UDP when this site and land to the north was the ‘strategy allocation’ and the change in the LDP2 reflects the passage of time and the dynamic in maintaining a suitable supply of employment land to meet identified needs.
- 9.4 The proposed development at the site will continue to meet employment needs in the borough at a regionally and national significant location, and, though no longer specifically allocated for a ‘large single user,’ the use of the site for large scale employment units continues to reflect the demand for units of this size and ilk in this location.
- 9.5 The proposed ecology zone falls (eastern fields) falls outside the confines of the WIE in the allocated and emerging plans, but as it is not built development its use is compatible with the area of existing countryside within which it is located. To clarify, there also remain areas to north and south of the proposed built area that will be retained / enhanced / provided to serve ecological purposes to provide connectivity in line with the Green Network objectives for the WIE. We turn to this issue later in the assessment.



Employment considerations and social benefits

Land and floorspace

- 9.6 The Employment Land Report confirms that there is a recognised and strong need, plus market demand, for the type and profile of unit proposed under the planned development. Referencing the evidence base to the upcoming LDP, it acknowledges the plan strategy to focus employment development at Wrexham Industrial Estate – it has seen approximately 80% of employment land uptake since 2006 in the borough. And this emphasises the importance to the protection of existing employment land under LDP Policy EM1 to maintain such uptake going forward².
- 9.7 Though the 2015 Employment Land Review (ELR) in support of the LDP found sufficient land to meet identified needs over the plan period, the overall sufficiency masks the more limited opportunities for investment at both ends of the market for new build premises to attract inward investment and support business development / growth. Thus the ELR recommended a further 20-30 ha allocation to meet specific larger unit(s) / business needs. A position FIREM and its advisors concur with.
- 9.8 In terms of provision FIREM, and its agents, identify a range of occupier needs, (see Employment Land Statement, Section 5 Local Market Considerations), and this leads to findings (Section 6), that there is demand for large / very large, big box units to serve national / regional logistics operations, i.e. Use Class B8. Such sites are limited in availability and the application site, aside from the proposed allocation KSS3 (Policy SP11) which remains some time off delivery to the market, is the only deliverable opportunity at the estate.
- 9.9 Deliverability of this site for large units for logistic operations, making best use of the limited land opportunity at the Estate, is an important material consideration in support of the planning application, and in alignment with Policies EM1 and SP10 objectives, and wider plan strategy of Policies SP2 and SP9.

Employment Generation and Benefits

- 9.10 As set out in greater detail in Section 5 of this Statement, based on the target floorspace of site area, the proposed development and adjusted multipliers and related influences, the

² Policy EM1 does not apply to the 'Eastern Fields' which lie outside the defined industrial estate



proposed development provides potential to deliver a substantial amount of new employment. This is in the order of up to 1,033 FTE jobs created.

- 9.11 This is a significant benefit of the development and one which contributes greatly towards Levelling-Up Fund and economic development objectives.
- 9.12 This aspect of the proposed development is a major benefit and should be given great weight.

Social Values benefits

- 9.13 In addition and as set out in Section 5 and the Social Values' *draft Statement of Intent*, the proposed development offers the potential to deliver a wide range of valuable social values and benefits linked to LUF initiatives. This covers the direct benefits of FIREM investment in construction, associated employment, training and apprenticeships; to providing long-term employment opportunities working alongside tenants; and long-term management commitment to the wider Wrexham Industrial Estate to benefit social, economic and environmental initiatives.
- 9.14 These aspects of the proposed development are a major benefit and should be given great weight.

Employment policy

- 9.15 Policies SP2, SP9 and EM1 combine to promote and safeguard land for employment use, to secure employment opportunities over and beyond the plan period. Combined with specific allocations and the general employment designation and pre-eminence of Wrexham Industrial Estate under Policy SP10, this development proposal delivers squarely into the plan strategy.
- 9.16 Moreover, if locations like the application site are not utilised effectively and efficiently for large-scale units it has two negative effects – first, it reduces the opportunity to capture a growth area of the economy within the borough leading to lost employment and associated social benefits; second, it will place pressure on unallocated greenfield sites elsewhere to potentially make good on that demand.



Site profile

Position

- 9.17 The profile of the application site including its location, size, potential in development terms and by reference to adjoining uses, make it eminently suitable for the form and scale of development proposed, and this also matches its allocation in the former adopted development plan, and the new designation as part of the Wrexham Industrial Estate, suitable for employment generating development, subject to balance to ecological / environmental impacts – i.e. Policy SP10 and its balance with delivery of an integrated Green Infrastructure within and around the estate.

Surrounding land uses

- 9.18 The site, with exception of the eastern fields, forms part of the established Wrexham Industrial Estate. It is a long-established location for major industrial and commercial development, including warehouse & distribution uses as is proposed in this application. To emphasise the point, the site is suited to and appropriate for employment development.
- 9.19 This means that the site can, in principle, be considered acceptable to receive development that generates industrial activity and noise on a 24-hour basis. That is not to say a development here need not be subject to environmental constraints on noise, air quality and other emissions, but in principle if appropriately mitigated the use is acceptable. We return to specific matters of noise and air quality later.
- 9.20 The previous UDP allocation, the grant of outline planning permission for a potentially 500,000 sq ft single unit in 2010, and the incorporation of the site, with exception of the eastern fields, into the defined Estate under Policy SP10, all demonstrate that the land is suited to the scale and profile of the proposed development with regard to surrounding contexts and uses. These include large-scale warehouse & distribution facilities to the north and south, Net World Sports and Very Group Ltd respectively, and the Kellogg's cereal factory is to west and there are numerous other businesses further to the west and south.
- 9.21 It is only to the east that the site gives way to agricultural land, isolated and grouped homes forming Isycoed. The previous allocation and present defined boundary of the Estate recognises the importance of maintaining a degree of separation, which is over 250 metres or ¼ km at its closest point (nearest home to SP10 policy boundary). This provides



a significant physical separation between residential and industrial uses to protect the amenity of the former. We turn to noise and air quality later, similarly also visual impact which forms part of residential amenity considerations. But for now we record that, as a matter of principle, the site is capable of receiving the proposed scale of development, a matter that was previously acknowledged through the 2010 outline permission too.

Access and highway considerations

- 9.22 The application is supported by a Transport Assessment and Travel Plan prepared by Prime.
- 9.23 Post PAC two changes have been made to the draft TA presented, the first being revision of the opening year from 2025 to 2027 and update to TEMPro Version 8 released in February 2023. In addition to the previously agreed scope of a study area for highway impacts, additional analysis on impact was undertaken to the B5130 which was a matter raised by PAC consultation respondents³.

Access, layout and parking provision

- 9.24 The main vehicular access to the proposed development is to be taken from the existing access to the Very Group site utilising the existing priority-controlled junction off Bryn Lane. The amended access will accommodate the transportation needs of the new development and existing use. Refer to drawings P21066-100E Potential Access Strategy and P21066-101A Swept Path Analysis, (also provided within TA Appendix C), for illustration of the access. The means of access is part of the detailed permission sought.
- 9.25 The new access will serve the new circulation road that is designed to serve each of the proposed units (whether a 2 or a 3-unit scheme). Unit car parks and service yards/HGV access will be separated within each unit demise. Refer to drawing 1204-02-001 Proposed 4 Unit Site Plan Rev 4 for illustration, the internal layout being a reserved matter.
- 9.26 The illustrated 3 unit layout provides for 654 parking spaces (Unit 1: 175 spaces including 18 accessible; Unit 2: 183 spaces including 18 accessible; Unit 3: 296 spaces including 30 accessible), this provision is approximate to council parking standards for Class B8 uses (1 space per 100 sqm). A total of 90 safe and secure cycle parking spaces are also to be provided near to the main buildings access also in accordance with council standards of 1

³ Transport Assessment, section 1.2 Scope of Report



space per 1,000 sqm. Overall the proposals demonstrate policy compliance and to LPG guidance 15 Cycling and 16 Parking Standards.

TA analysis

9.27 Readers are advised to refer directly to the TA for detailed analysis through its Sections 2 to 6 including describing existing local highway network conditions (Section 3); details of the proposals and mitigation measures (Sections 4 & 5); and traffic forecasting and impact assessment on the local highway network (Sections 6 & 7). Here we reflect on the TA conclusions (Section 8) with some additional threads brought through from those earlier sections to respond to policy.

9.28 Conclusions are:

8.1.3 *An analysis of [recent five-year] accidents showed that there does not appear to be a proliferation of accidents at any one location suggesting that highway safety is not an issue that would preclude the development of the site.*

8.1.4 *The main vehicular access to the site will be facilitated via a priority-controlled junction from the access road to the Very Group site. This is a private road for which the applicant has rights of access. This road provides an access onto the main road network at an advanced ghost island right turn priority-controlled junction on Bryn Lane. This route also provides the main pedestrian/cycle access to the proposed development.*

8.1.5 *Car parking for Units 1 and 2 and cycle parking for all the units are to be provided in accordance with WCBC's parking standards. Car parking for Unit 3 will be provided in line with other large scale B8 schemes across the UK.*

8.1.6 *An assessment has been undertaken of the site's level of accessibility by sustainable modes, from which it can be concluded that realistic options exist for access to local residential areas and local amenities on foot, by cycle and by public transport. However, it should be noted that bus access to the site limited and the applicant is prepared to engage with the public transport officers at WCBC and the local bus operators to discuss how effective improvements to public transport provision can be facilitated*

9.29 Correctly the TA recognises that such improvements to public transport would be potential matters for section 106 legal agreement, and longer-term improvements may require pooled contributions from other developers. FIREM is supportive in principle to lead improvements to facilitate delivery of this proposal.



8.1.7 An assessment of the capacity of the proposed site access has been undertaken this confirming that the access will have ample capacity to accommodate the predicted traffic flows in 2036 with the development in place.

8.1.8 The development traffic will also have a negligible to minor impact on the surrounding highway network.

9.30 Going back to TA, Section 7.4, the impact on B5310 (Ridleywood and Isycoed) notes that it is not anticipated that many HGV drivers associated with the development will chose to travel this way (residents' and Community Council concerns). Moreover, as developer and landlord, FIREM has the ability to discourage its future tenants to operate vehicles on this routing which can be secured through Travel Plan and other contractual means.

9.31 The overall conclusion of the TA states:

8.2.1 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 to minor impact on the operation of the surrounding highway network.

8.2.2 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.

Policy consideration

9.32 The TA itself references policy, and at para.8.1.2 confirms the TA was prepared in compliance with PPW11 and TAN 18: Transport, as well as local policy documents.

9.33 LDP Policy T1 Managing Transport Impacts supports new development where it includes measures across five areas of (i) sustainable modes of transport, (ii) mitigating any significant adverse impacts, (iii) safety, (iv) parking and access, and (v) mobility access. It is considered that the evidence of the TA comprehensively addresses the policy requirements in scope of evidence and finds that there are no significant adverse impacts to direct the proposal is in conflict with the policy.

9.34 LDP Policy T2 Active Travel sets five criteria to enable people to access, in this instance employment, in new development. Once more the scope of evidence through the TA, and



also the proposals set out in the Travel Plan, address the requirements of the policy. The scheme has been positively designed to integrate walking and cycling access (i), it will (in reserved matters detail and Travel Plan requirements) encourage Active Travel will appropriate facilities (ii) and routing support (iii), provide information on travel choice (iv) and, so far as internal site access the safety of cyclists and pedestrians will be of paramount operational importance given the HGV movements within the site (v).

- 9.35 In line with LDP Policy SP6, the applicant will negotiate an appropriate balance of support through planning conditions and legal agreement to secure active travel, public transport and highway improvements – the latter through relevant section 278 agreement as may be required.
- 9.36 Overall, the transportation related elements of the proposed development including impacts on the local network and other matters of relevance is considered acceptable.

Ecology considerations

Introduction

- 9.37 The applicant's ecologists are UES and they have considerable knowledge of WIE having previously advised on a number of other sites and areas of land in this area. They are also currently advising on a number of developments (and applications) in WIE.
- 9.38 Based on the advice and experience of UES, the approach proposed to deal with ecology has involved three key stages of work and related presentation. The first identifies in full the ecological and biodiversity assets of the site. The second has assessed the impacts and effects of the proposed development on these assets. The third involves consideration and advice on whether the assets can be protected and, if necessary, how any adverse effects arising can be mitigated.
- 9.39 These stages of work have provided a significant number of surveys and documents prepared by and for UES as listed below that now accompanies the application. The two key documents are the Preliminary Ecological Appraisal (PEA) which essentially describes the baseline of the site and the Ecological Impact Assessment (EcIA) which describes the impact of the development proposals and sets out mitigation measures and residual impacts, both positive and negative.
- 9.40 The list of ecological documents prepared are listed below (*) marks a new / updated report since PAC:



- * Preliminary Ecological Appraisal, UES03448/01
- Badger Activity Survey, UES03448/17 (confidential)
- Badger Sett Closure Method Statement, UES03448/24 (confidential)
- * Bat Activity Survey, UES03448/12
- Bat Ground Level Tree Assessment, UES03448/06
- Bat Aerial Tree Inspection Assessment & Presence / Absence Surveys, UES03448/16
- Breeding Bird Survey, UES03448/11
- Dingy Skipper Survey, UES03448/15
- Great Crested Newt Impact Assessment, UES03448/07
- Great Crested Newt Presence / Absence Survey & Population Size Class Assessment, UES03448/09
- Great Created Newt Method Statement, UES03448/23
- Pond PYSM Survey: Predistve System for Multimetrics, UES03448/14
- Invertebrate Assessment for UES, Conops Entomology Ltd
- National Vegetation Classification Survey, UES03448/13
- Reptile Presence / Absence Survey, UES03448/08
- * Ecological Impact Assessment (“EcIA”), UES03448/22

9.41 Through PAC the response of NRW supported the evidence base and the outlining of proposed mitigation measures, subject to potential imposition of planning conditions to ensure delivery and conformity to mitigation measures. NRW comments included ensuring that the proposed ecological mitigation area was subject to proper stewardship by a relevant body. This is a matter which can be secured through Section 106 Legal Agreement in negotiation with the local authority and is commented on below from the suggestions drawn from the ecological work.

Commentary

9.42 In addition to the form industrial use in part of the western and southern areas of the site previously described, the ecologist surveys identify that the site contains large semi-improved grassland fields interspersed with ponds, small stands of woodland, hedgerows and scattered trees. Large areas of the site have succeeded into dense scrub and areas of



bare ground and ephemeral / short perennial are present on previously developed land within the south-eastern section of the site.

- 9.43 The south-western section of the site contains an area of intensively managed amenity grassland and a large hardstanding compound currently used to store vehicles. A shallow stream runs along the northern site boundary and wet ditches are present along the eastern and western boundaries.
- 9.44 Habitats and ecological receptors present on site are consistent with the undeveloped areas within the wider Wrexham industrial estate, with pockets of woodland, brownfield land, ponds and species-rich grassland.
- 9.45 Regarding the link between the first and second stages of work, and early related sub-stages of the second area of work, ecology and biodiversity was a key consideration in the design process that informs the proposals. This commenced with the Preliminary Ecological Appraisal (PEA) instruction in August 2021.
- 9.46 The purpose of this initial assessment was to identify key habitats and protected species present or potentially present on site, to ensure these receptors could be considered in the earliest stages of the design process.
- 9.47 The initial survey and accompanying desk study identified the presence of some important ecological receptors on site, namely species-rich grassland, brownfield land with the potential to support dingy skipper butterflies and numerous ponds that have historically supported a population of great crested newts (GCNs) *triturus cristatus*.
- 9.48 Discussions with stakeholders suggest that the nature reserve should be a mosaic of wetlands and ponds. The creation of a local wildlife site will also offer an unusual opportunity to reinstate pre-existing habitats which have been removed during agricultural intensification, notably species-rich hedgerows, woodland, marshy grassland and ponds. Management, including some limited public access, and interpretation boards, will be secured as part of the planning process as well as wider legislative commitments in relation to protected species. Ownership of the nature reserve will be transferred to a competent third party such as the Amphibian and Reptile Conservation Trust (ARC) or North Wales Wildlife Trusts.
- 9.49 There has been technical input from ecologists into the design of the site in totality from the start. This has safeguarded the retention of some key habitats as well as the provision



of habitat corridors and buffer zones along field boundaries. These measures seek to maintain wildlife corridors at a site/local level which in turn supports ecological connectivity across the wider rural landscape and industrial estate.

- 9.50 Turning from the process to the findings from that process, the conclusion of the PEA (section 5) considers the likelihood of potential impacts on matters of ecological importance from the proposed development as:

*The preliminary ecological appraisal has highlighted potential issues with the following ecological receptors on or adjacent to site: amphibians, badgers, bats, breeding birds, invasive species, invertebrates, ponds, plant communities, reptiles, streams & ditches, trees & hedgerows and woodland. **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.

[Emphasis added by Plan Red]

- 9.51 From the in-depth survey and analysis in surveys and reports of the identified potential likely significant impacts it is found that in line with expectation in the PEA, that such significant impacts can be successfully mitigated through the development proposals. Therefore there are minimal residual, or no residual impacts for some matters, of habitat or species importance which can be managed and maintained through long-term operational development including the management of the proposed ecological zone.

- 9.52 This is set out within the EcIA findings. This considers impacts of construction and operational phases of development, and proposals for mitigation, compensation and enhancement during both phases, and leads to overall findings of residual impacts, again to each phase. EcIA (section 9) reaches a conclusion that:

The EcIA has identified various impacts up to a county level due to the presence, or potential presence, of protected or species / habitats of principal importance within the site boundary or the surrounding area.



Mitigation and compensation measures are provided within section 7 of this report in order to reduce the impacts to insignificant levels. Furthermore, recommendations for enhancements are provided, which could improve the availability of some habitats and the opportunities for some species locally following the development, resulting in a minor positive outcome.

All proposed mitigation, compensation and enhancement measures can be further detailed within an LEMP, CEMP, EDS and invasive species method statement as required, and can be secured through suitability worded planning conditions.

Provided the proposed measures within this report are followed, it is considered that the proposed development will be compliant with all relevant legislation and both national and local planning policy, and that the aforementioned ecological receptors will not be significantly negatively impacted.

[Emphasis added by Plan Red]

9.53 It therefore can be concluded that through the surveys and investigations carried out by UES, and its partners, into matters of ecological importance, that in line with expectations set out in the PEA that the EcIA confirms that with appropriate mitigation or compensation measures, the residual impacts of the development will not lead to significant impact on ecological receptors.

9.54 Overall, it is considered that the scheme broadly accords with all relevant local and national planning policy relating to ecology and biodiversity and that the scheme delivers some significant and notable ecology and biodiversity benefits.

Delivery of proposed ecological mitigation measures

9.55 Through the submitted series of drawings WRE2206-PP01-P4 Planting Plans and Schedules, the detail of the formation of retained, enhanced and new habitats, planting, trees, hedgerows, ponds and grasslands are described. These works are submitted for detailed approval with exception of the minimal planting illustrated between the 3 units which will be subject to future reserved matters application.

9.56 Delivery will be supported by:

- Landscape Ecological Management Plan (LEMP)
- Construction Environmental Management Plan (CEMP)



- Ecological Design Strategy (EDS)
- Invasive Species Method Statement
- Section 106 Agreement

9.57 All drawings and documents will be subject to approval and implementation through planning condition.

Ecological Enabling Works Application

9.58 Since PAC and reviewing the timescales available in each calendar year to undertake preparatory works, under advice by UES, the developer intends to submit a parallel ecological application. The intention is to enable a decision to be reached earlier on the eastern fields to facilitate preparatory enabling works to receive the future translocation of newts from the main site and its development as an ecological mitigation zone.

9.59 The works are necessarily limited by what is possible under licence but nonetheless are a considerable assistance to the phased delivery of the development. Importantly a grant of enabling ecological works on the eastern fields do not fetter the decision of the authority on the main application, i.e. the enabling works can be carried out as a benefit irrespective of the main site development, but the intent is the main application will in due course continue forward the works.

9.60 Relevant details of the coverage of the ecological enabling works are set out in the separate, parallel application. For the main application it is sufficient to register this is the intent for phased delivery.

Policy context

9.61 Setting aside the eastern fields, the site is located within the Wrexham Industrial Estate to which Policy SP10 applies that not only designates the land for employment use, but also designates land and areas through the estate as part of a strategic ecological network for a number of locally, nationally and internationally protected species and habitats, including Great Crested Newts. This policy is supplemented by the Wrexham Industrial Estate: Green Network as referenced in the LDP (para.5.61) and related guidance⁴.

⁴ LPG Note 29 Wrexham Industrial Estate: Employment Development and Nature Conservation; LPG Note 32 Biodiversity & Development



- 9.62 The comprehensive evidential based approach has sought to balance the employment needs and unavoidable impacts to form access, infrastructure and build platform, including drainage infrastructure, and the need to mitigate the ecological impacts. This approach informed the acquisition of the eastern fields to better provide a range of habitat to accommodate translocated GCN communities, wider improvements to the green network and connectivity around the estate. The approach reflects exemplified advice in LPG 29 (Appendix 7) but not only relating to impacts on GCN but to a range of protected and other species and their habitats.
- 9.63 The development approach secures a balance of protected, conserved and enhanced (including new provision) natural environment in line with Policy SP15 Natural Environment expectation. Hedgerows and tree planting to site boundaries and within the eastern fields and southern area will blend with grassland to contribute to the quality and diversity of the natural environment as sought by policy and in Policy SP20 Green Infrastructure. This links to reference to climate change resilience referenced in Policy SP15 and to Policy SP19 Climate Change and point (v) that seeks to maintain ecological resilience.
- 9.64 The evidence presented by UES, summarised in terms of effects through its Ecological Impact Assessment, provides the basis to conclude that there will be no detrimental impact to the maintenance of the protected species, including but not limited to GCNs, so that the population concerned remains at a favourable conservation status (Policy NE1). The impacts of the development are demonstrably in the public interest in the social and economic benefits secured through the employment use in an area designated to receive such development in the recently adopted development plan. By extension it can be concluded that Policy NE2 is satisfied that there is no alternative location to receive the employment development – indeed it would be counter to wider plan strategy and policies not to develop at this location given it would place pressure on other less suitable sites. And that the compensation measures are relevant to the scale of the assessed impact of the development.
- 9.65 It is therefore concluded that the ecological impacts of the proposed development have been extensively investigated and assessed. This has led to an appropriate, balanced and focused range of ecological mitigation measures which will be delivered under relevant licence conditions. This aligns with local development plan policies, and wider government policies and objectives set through PPW11 and TAN5 relating to biodiversity.



Trees and hedgerows

- 9.66 We consider trees and hedgerow and Policy NE3 separately, though there is a clear overlap in the evidence base, assessment and landscape planting design of the ecological mitigation measures.
- 9.67 Although a number of trees will be retained, including wooded areas along the western, northern and eastern site boundaries, some trees will be lost to the development, primarily in the central area of the main site. To mitigate for their loss the intention is that they will be replaced and complemented by additional planting which will form part of the landscape and ecology related proposals for the site, which are detailed in drawings WRE2206-PP01-P4 Planting Plans and Schedules. The Schedule proposes 207 new trees and 1,772 metres of hedgerow planting in a wide mix of native species.
- 9.68 Going forward it would be the intention to manage these resources through a conventional Landscape Environmental Management Plan applied in phases to the detailed and then extending to the outline elements of the scheme once details are approved. Suitable planning condition can secure these details.
- 9.69 Policy NE3 seeks to protect trees, woodlands and hedgerows from unacceptable harm. This proposal does not lead to unacceptable harm. It preserves and retains perimeter trees and hedgerow to western, northern and eastern site boundaries, as well as areas located in the eastern fields and to the area between the proposed buildings and Very Group Ltd premises. As described, this is supplemented by new tree and hedgerow planting aligned to the wider ecological mitigation strategy. It is considered this supports policy objectives to respect and appropriately use woodland / trees / hedgerows on boundary edges (i), the site will be subject to long-term management via LEMP (ii), and it will assist the Council in achieving its Tree & Woodland Strategy 2016-2026 aims & objectives (iii).
- 9.70 Overall, the proposed development's impact on trees and hedgerows can be regarded as acceptable.

Ground Conditions

- 9.71 A *Phase 1 Site Investigations Assessment*, prepared by SP Associates ('SPA'), reference S1761 dated September 2021 accompanies the application. Appendix C to the Assessment provides an Initial Conceptual Site Model (CSM) and Preliminary Risk Assessment. It



finds only Low and Very Low risk from sources to receptors of soil, geology, hydrogeology and hydrology importance.

- 9.72 No comments were received on the matter through PAC. Therefore, we continue into application on the basis of the findings of the initial CSM that there is likely to be no significant effects arising to receptors from the proposed development, and that any impact will be localised and can be mitigated through standard construction management and other statutory controls. As such it is considered the proposals will not give rise to likely significant impacts on soils, geology, hydrogeology and hydrology.
- 9.73 This confirms the ground conditions of the site and its suitability for the proposed development. As such foundation design does not need to be specialist and can be either of conventional strip or pad footings design.
- 9.74 The proposals therefore accord with objective of Policy DM1(c) in protection from adverse effects of land instability / pollution pathways.

Flood risk and drainage

- 9.75 To demonstrate that the proposed development can be satisfactorily developed without causing unacceptable harm to matters pertinent to flood risk, known and envisaged, and through the need to provide a satisfactory drainage system, the application is supported by a range of support documents by Barnsley Marshall, this includes:

- Drainage Operation and Maintenance Manual
- Drainage Strategy
- Drawing: KSM-BML-XX-XX-SK-C-0501 P05 High Level Drainage Strategy
- Due Diligence Report: Geotechnical, Flood Risk & Drainage
- Flood Consequence Assessment

Flood risk

- 9.76 On flood risk the conclusions of the FCA, para 4.11 states:

In accordance with TAN 15 Chapter 9: Summary of Policy Requirements, a Less Vulnerable Development in Flood Zone A is acceptable with 'no constraints relating



to river or coastal flooding, other than to avoid increasing risk elsewhere,' and the Justification Test is not applicable.

The site is therefore suitable for the type of development proposed.

- 9.77 The proposal therefore meets the requirement of Policy DM1 parts (c) and (h) in relation to not increasing flood risk and safeguarding from adverse effects.

Drainage

- 9.78 The Drainage Strategy and associated documents prepared by Bradley Marshall follows sustainable drainage principles (SuDS). Table 3 to the Strategy summarises that swales, permeable paving and storage systems (geo-cellular or tanks) are the appropriate responses based on site geology and proposed development.
- 9.79 Surface water drainage strategy (Strategy, section 3.4) sets out recommendation for post-development surface runoff controls to offer an improvement on existing downstream flash flooding risk, taking into account climate change - *controlled to the 1-year Greenfield Runoff Rate of 116.6 l/s maximum for all storm events up to and including the 100-year + 40% CC storm event.*
- 9.80 The controlled runoff will be discharged into existing ditches that run along the east, west, and north of the site. Approval for the discharge will be required through the SuDS Approval Body (SAB) within Wrexham County Borough Council.
- 9.81 Strategy, section 3.5 sets out pollution control and water quality proposals for treatment from permeable pavement areas (occupied by vehicles), swales (effluent controls), catchpits (debris) and vortex separator/ downstream defender (capture PAHs, silt and debris from parking before reaching storage tanks).
- 9.82 Spillage Pollution Control (Strategy, 3.6) shall be ensured by placing Penstock Chambers with 450mm deep sumps at proposed swale outlets to capture any remaining silt before it goes into the underground tanks, and also to enable lowering of the penstocks in the event of an oil spillage, which would stop oil getting into the tank. The spilt oil can then be decanted, the swale cleansed, and then the penstock could be lifted to resume normal operation.



- 9.83 Foul drainage will flow by gravity from the units to a proposed onsite foul pumping station which shall discharge into an existing Welsh Water public foul sewer at the south-western edge of the site (Strategy, 3.8).

Phosphates

- 9.84 Foul drainage connection is subject to parallel considerations of phosphates which is both a site / local and national issue. Since PAC there has been a significant movement in the national and local policy situation over phosphates, the most important being an approach has been agreed to permit the adoption of LDP2 and the fully revised Policy NE6. Policy NE6 essentially allows two approaches; the first to rely upon measures for phosphate reduction secured by Welsh Water and other statutory undertakers, and the second to rely upon developer-initiated measures.
- 9.85 Officer discussions in March 2023 indicate that a clearer picture of phosphate capacity at major existing waste water treatment works ought to be known in late Spring or early Summer, though it is understood that NRW's capacity assessments will take 12-18 months to complete nationwide. By time of determination of this application there is a possibility that headroom will have been proven to exist in waste water treatment works to accommodate the development without need of further mitigation; essentially Policy NE6 option 1, and without need of legal agreement for funding and/or phasing controls.
- 9.86 Assuming for now option 1 is possible then there will be a likely net benefit to phosphate emission from the site because the surface water drainage will be mitigated to some degree even without further design intervention.
- 9.87 Should headroom be insufficient at the Gresford WwTW which the site will connect into, then it will be necessary to consider option 2 as an approach. FIREM and its advisors, Delta Simons and Bradley Marshall, have done some initial design work on this option, but given the policy uncertainty and pending NRW findings it has paused this work at point of submission following the officer meeting.
- 9.88 Essentially, if option 2 needs to be pursued then it may require a modification to the layout / landscape / swales and wetlands to provide the required level of on-site mitigation for surface water phosphate discharge offsite to secure a betterment on the existing agricultural land discharge. And this must be balanced against the net phosphate increase from the employment use. Net meaning here the net number of new employees



commuting into the SAC catchment and not accounted for in existing residents within the catchment area.

- 9.89 Draft modelling has demonstrated that it is possible to reach a phosphate neutral position on a holistic site basis, i.e. the surface water runoff mitigation counterbalances the net foul waste discharge to sewers that cannot be mitigated.
- 9.90 To bring to an interim conclusion on Policy NE6, there is a likelihood that option 1 will be available and no mitigation for phosphates is required and the policy shall be satisfied. Even in this case FIREM will seek to make some form of betterment in surface water runoff which will be confirmed in due course. If option 2 is required then FIREM and its advisors are confident a revision to the scheme can be made to secure compliance with policy as outlined above. Either route, at the point of determination of the application the policy shall be satisfied.

Policy context

- 9.91 Related to phosphates a policy compliant proposal can be achieved through either option 1 or 2 to Policy NE6, at this time option 1 is the expected outcome to be confirmed in continued discussion with officers, NRW and Welsh Water. This will also conform to Policy DM (h) requirements not to unacceptably impact on the water environment.
- 9.92 The site does not give rise to concern on flood risk, and no sequential approach is required per TAN15 guidance, and the proposals accord with Policy SP19 (vi), (vii) and (viii) requirements, and Policy DM (h).
- 9.93 All elements of the drainage design approach have incorporated sustainable drainage principles and allowance for climate change in accordance with Policy SP19 (iii) and to mitigate and safeguard the water environment from pollution in accordance with Policy DM (c).

Noise and vibration

- 9.94 A Noise Assessment prepared by Wardell Armstrong in support of the application.
- 9.95 The Assessment finds that future plant will not give rise to material harm providing it operates to specified noise ratings / attenuation which can be secured by standard planning condition. And associated increases in noise from traffic generation at 4 modelled receptors finds increases within +3dB which is considered a negligible impact.



- 9.96 Through PAC the WBC Public Protection officer accepted the findings of the assessment. This came with a request for a future planning condition to apply a constraint to a +1dB daytime exceedance over existing background levels. This is more stringent than the +3dB difference modelled, and we are advised is a marginal difference that may not be perceived by the human ear. We will defer to agreement between the noise specialists to inform the future planning condition.
- 9.97 Vibration from construction will be temporary and can be controlled through a relevant construction management plan. Operational development will not include heavy plant or machinery and no significant effects are forecast.
- 9.98 Accordingly the proposals at construction and operational stages will not give rise to nuisance by means of noise and vibration to nearest receptors, and therefore accord with Policy DM1 (c).

Air Quality

- 9.99 An Air Quality Assessment has been prepared by Wardell Armstrong in support of the application.
- 9.100 The Assessment considers dust and fine particulate matter emissions during the construction phase, and road traffic emissions in the operational stage. The Assessment demonstrates that the proposal will *not lead to an unacceptable risk from air pollution, or to any breach in relevant national objectives. Therefore, there are no material reasons in relation to air quality why the proposed scheme should not proceed, subject to appropriate planning conditions.*
- 9.101 WBC Public Protection officer raised no adverse comment through PAC to the draft Assessment findings. Appropriate planning conditions to control emissions in construction is considered to be a Construction Environmental Management Plan (CEMP).
- 9.102 No operational stage conditions are identified presently to be required given nature, scale and character of the end use.
- 9.103 The proposal is in accordance with Policy DM (c).



Landscape and Visual Impact Assessment

- 9.104 A Landscape and Visual Impact Assessment (LVIA) has been prepared by PGLA in support of the application.
- 9.105 The LVIA sets out in its Introduction (Section 01) the assessment methodology, study area and site description, and in the Baseline (02) relevant national and local landscape characteristics, local plan and other landscape designations and sets a visual baseline for assessment. Section 03 describes the existing site and proposed development, and Section 04 the potential landscape and visual effects arising from the development proposals. This leads to Section 05 that sets out a proposed landscape strategy and mitigation. Matters are concluded in Section 06 and supported by Viewpoint Locations and Panoramas 1-17 in its appendices.
- 9.106 The LVIA confirms:
- The site is not within a defined Special Landscape Area
 - The site is not crossed by public footpaths
 - Nearest receptors of close-range views are to/from public highways to east and west of the site
 - Generally the site is visually contained to localised short distance views which is a product of the site and landscape which is relatively level and contained by boundary hedgerows and trees with glimpsed views beyond
- 9.107 Drawing from Section 06 conclusions, the LVIA finds:
- *The assessment of the landscape sensitivity of the site is determined as being medium. The potential effects on the landscape concludes that there will be an obvious and immediate change in the character of the existing site as the proposed warehouse units and associated infrastructure are introduced. However, there are opportunities to improve the landscape condition of the site by extending hedgerow boundaries, introducing ecological ponds, breaking up the expanses of hard standing to allow for naturalisation and introducing street trees, native hedgerows and shrub planting into the developed part of the site. (6.8)*
 - *There is potential for the identified adverse effects identified at the operational stage to be reduced over time as the planting and landscape framework within the site matures leading*



to moderate to minor long term residual effects across the site and its setting respectively. (6.9)

- *All existing boundary treatments will be retained and be enhanced where necessary retaining the key local landscape characteristics as well as improving the landscape condition and extending ecological corridors. The setting of the site will benefit from the infilling and reinforced hedgerow planting along the boundaries where applicable which will assist in integrating the development into the wider landscape. The built form will be softened by the high-quality landscape framework surrounding and within the site and the long term residual effects are likely to be minor and beneficial. (6.10)*
- *The proposed development is likely to have long term negligible and neutral effects on the broad landscape character. The site is not located within any nationally recognised landscape, environmental or cultural designation and is currently comprised of a partly developed area as well as fields of semi-improved grassland bound by mature hedgerows and trees. The proposals are seeking to introduce a high-quality commercial development that works with the existing mature green infrastructure surrounding the site. (6.11)*
- *The landscape proposals are also considered to be potentially beneficial and will help to reduce and neutralise any perceived adverse effects and will increase the opportunity for providing ecological enhancement and increased biodiversity to the area. (6.12)*

9.108 The visual assessment determined the sensitivity of residential receptors to be medium (6.13) due to no principal rooms directly overlooking the portion of the site to be developed; i.e. the 250m+ separation from nearest properties, that principal rooms are at ground level and there are hedgerows / trees to private gardens and fields between the receptor room / window and the future developed portion of the site. The assessment acknowledges first floor windows (bedrooms) may have views over fields toward Kellogg's currently and Very Group (6.14). LVIA Viewpoints 9 to 17 provide a range of visual assessments points from positions along B5130.

9.109 Impact on residential receptors is summarised as:

- *Generally, the existing and proposed planting will mature and will offset many of the adverse effects for the residential receptors over time. The design of the new buildings are of a similar quality and reflective of the local context in terms of materials, mass and style and the landscape will be consistent with the overall character of the area. The likely residual effects will be moderate minor and adverse and permanent. (6.15)*



- 9.110 During PAC a number of neighbour comments and comments from the two Community Councils challenged the analysis on the potential impact on the height of the proposed buildings and visibility from homes to east along Bryn Lane, potential material finishes and artificial lighting.
- 9.111 The applicant stands by the analysis and likely residual effects of moderate minor and adverse and permanent. This analysis accepts that the new buildings will be visible but has balanced this on the sensitivity of the receptor as medium given the significant degree of separation and at ground level lesser intervisibility, and to the value of existing and proposed planting, and its maturity.
- 9.112 Though materials are a reserved matter, providing within the LVIA appendix is a CGI (lower-res reproduced as Figure 9 over page) that illustrates one option for use of colour to which the LVIA analysis has considered.
- 9.113 On matters of lighting raised in PAC responses this is a matter of detailed design, but there will be a necessity to minimise lighting along the eastern boundary (rear Unit 3) not only to minimise glare toward residents to the east, but to the benefit of nocturnal creatures moving along this corridor. This can be attained through minimising lighting to what is necessary (i.e. fire door / safety), positioning (no floodlighting), using movement / timer sensors and cowling to protect from glare. This can be controlled by planning condition.
- 9.114 On matters of lighting raised in PAC responses this is a matter of detailed design, but there will be a necessity to minimise lighting along the eastern boundary (rear Unit 3) not only to minimise glare toward residents to the east, but to the benefit of nocturnal creatures moving along this corridor. This can be attained through minimising lighting to what is necessary (i.e. fire door / safety), positioning (no floodlighting), using movement / timer sensors and cowling to protect from glare. This can be controlled by planning condition.



Figure 9: Extract CGI (source LVIA, Appendix 1) – view from within Eastern Fields (ecology mitigation zone) looking westward toward proposed built development – Unit 3 to front with side elevation of Unit 1 receding from view to left

- 9.115 On recreational receptors, including public footpaths, the sensitivity is considered as medium (6.16) though there are no footpaths that travel through or across the site, the closest being PRow Isycoed 18 passing south the Very Group warehouse. Due to intervening vegetation cover and enhancements in the vicinity of the eastern fields it is found that footpath users are unlikely to experience a harmful change in view, with minor moderate and neutral and permanent effects (6.19). Other footpaths in the wider area, even in winter foliage conditions, are expected to receive negligible effects (6.21). LVIA Viewpoints 3 to 9 illustrate PRow Isycoed 18.
- 9.116 No effects on immediate transport network are demonstrated directly adjacent to the site at Bryn Lane (6.22) and generally views will not undergo any change at transport receptors due to the retention of boundary vegetation and houses that screen views from the east, the degree of change being minor (6.23). LVIA Viewpoints 9 to 13 illustrate influence of houses, Viewpoints 14 to 17 illustrate views without houses.



LVIA conclusion and policy context

9.117 The LVIA concludes:

- 6.25 *In conclusion, the long-term residual effects of the development are not likely to exceed moderate within the site itself, however this is typical for all development within green field sites. The remaining residual effects will not exceed moderate minor and most of these are either beneficial or neutral and the duration of all effects are considered to be permanent.*
- 6.26. *Potential adverse effects that have been identified to be present at the operational stage, especially within the site and to some extent its setting will be reduced and offset by the mitigation provided in the potential planting scheme described within the landscape strategy and detailed on the Planting Plans submitted with the planning application.*
- 6.27. *Therefore, the findings of this report demonstrate that the site is able to accommodate the proposed commercial development without causing undue harm to the landscape character and visual amenity of the site and surrounding countryside and the footpath network.*

[Plan Red emphasis added]

- 9.118 In policy terms the LVIA demonstrates through detailed assessment of the site, location and landscape characteristics, and the impact of placing the proposed development into that context, that the no undue harm arises to landscape character and visual amenity.
- 9.119 Appropriate measures to retain, enhance and supplement existing vegetation has been taken in that assessment, and is set out in WRE2206_PP01_P4 Planting Plans and Schedule.
- 9.120 That appropriate measures can be secured through planning conditions / legal agreement to implement the planting scheme and maintain long-term to the ensure the mitigation benefits are received by the assessed receptors. For example, detail approval of the planting plans, schedule and landscape management & maintenance through condition, and long-term funding / delivery though legal agreement.
- 9.121 As such the development accords with the relevant requirements of Policy DM1 (a) in consideration of how the proposals affect and can be mitigated to accord with the character of the landscape and its surroundings. That the proposed scale of buildings,



including height, design and use of materials, will not give rise to significant adverse harm to receptors.

- 9.122 The degree of separation to closest residential receptors at over 250m means that there is no unacceptable effect on amenity per Policy DM1 (b).
- 9.123 As such the evidence of the LVIA, proposed planting plans and schedule, and illustrative materials, demonstrate that the scheme has taken into account the local characteristics of the surrounding area, including national and local landscape designations, and that the design solution proposed is an effective and appropriate response for an industrial development within a major industrial estate. It therefore accords with the design principles approach of Policy SP13 and the LPG 26 Landscape and employment development.

Sustainability, Energy and Climate Change

- 9.124 The Energy Council has been commissioned by FIREM to lead on its sustainability, energy efficiency and climate change matters. Specifically it is appointed to undertake a BREEAM assessment⁵ throughout the development process from project inception, through planning to delivery. The Energy Council is supported by NOVO in preparation of evidence to the BREEAM process, and its BREEAM EN04, Low Zero Carbon Report, (LZC Report), is submitted as information to the planning application.
- 9.125 The application submission is also supported by an Indoor Air Quality Plan has been prepared by Wardell Armstrong. Its purpose is to support the wider BREEAM process to ensure that the future buildings will meet category Hea 02 'Indoor Air Quality'. This feeds onto the LZC Report findings.
- 9.126 The Kingmoor development is targeted to achieve BREEAM 2018 Excellent rating.
- 9.127 The LZC Report prepared by NOVO is part of this process – other documents by the Indoor Air Quality Plan, are not submitted for planning purposes. The LZC Report sets out the passive design analysis, free cooling and low carbon feasibility study as dictated by the BREEAM EN04 process. In its Executive Summary it advises:

⁵ Building Research Establishment Assessment Method

The Passive Design section of the analysis has adopted a fabric first approach incorporating passive measures such as performance building fabric in addition to strategic building layout/orientation, amongst other features, to assist in obtaining this credit.

Regarding Free Cooling, BREEAM ENE04 requires passive free cooling measures to meet the total cooling demand of the building, while some free cooling features are present, they are unable to meet the cooling demand without supplement from an active cooling solution therefore the Free Cooling credit cannot be achieved.

Finally, various LZC technologies have been assessed for suitability and incorporated into the design as appropriate, this combined with passive design measures has resulted in a reduction in CO₂ emissions and Primary Energy Demand when compared against “standard” versions of the building model that exclude these benefits and use only notional inputs for fabric performance and systems.

The building will utilise efficient building fabric and incorporate low carbon, VRF heat pump technology, efficient lighting design and control systems to achieve a meaningful reduction in CO₂ emissions and primary energy demand over Part L, as required by BREEAM ENE04.

- 9.128 The LZC Report summarises the building fabric specification in Table 1, reproduced below.

Table 1 Building Fabric Specification

Building Fabric			
Element	L2A: 2014 Limiting U-values (W/m ² .k)	L2A: 2014 Notional U-values (W/m ² .k)	Proposed U-values (W/m ² .k)
Floors	0.25	0.22	0.18
External Walls	0.35	0.26	0.24
Roof	0.25	0.18	0.16
Windows	2.20	1.80	1.60
External Doors	2.20/1.5	2.20/1.5	2.20/1.5
Air permeability (m ² /h.m ² @ 50 pa)			
Full Building	10.0	3.0	3.0

- 9.129 BREEAM assessment works on a basis of credits to emphasise the reduction in energy consumption and assessing risks to climate change, this will ensure there is less waste, more re-use and recycling, together with lower life-cycle environmental impacts and



costs, better reliability, less maintenance, better daylighting whilst mitigating overheating risk and providing greater user satisfaction, health and well-being.

- 9.130 Relevant legislation is set out in Welsh Building Regulations Part L2A (2014/16) requiring a 20% carbon dioxide saving over the 2010 building regulations and includes a primary energy criterion for compliance. New Part L 2022 is aiming for a 28% carbon emission saving over the (2014/2016) regulation. And further consultations in 2023 for a Part L 2025 will require a 70-80% improvement is planned.
- 9.131 For purpose of this application the new Part L 2022 and a 28% CO₂ emissions saving over the 2014/16 will be targeted as the baseline for evaluation of effects.
- 9.132 A SBEM⁶ calculation will be carried out for each building to define the target CO₂ emission rate and primary energy factor upon which the actual buildings will have to improve upon. This will also define the fabric U-values, lighting and HVAC standards included in the development.
- 9.133 The baseline will form part of the approach to credits in the BREEAM Climate Change assessment, which will also include assessment to ensure the drainage system, fabric robustness and building services strategy work in cohort to improve sustainability of the development and reduce risk to climate change. It is anticipated that on completion of the BREEAM process that with mitigation measures, the likely significant affects will be of a minor / moderate negative impact over the baseline of the greenfield site.
- 9.134 Beyond BREEAM considerations matters of environmental, social and cost effectiveness are key issues relating to the sustainability performance of a development. A collaborative design team approach has been followed to ensure that sustainable design is at the forefront of design development. The development can deliver the highest sustainability performance possible within the constraints of the site, and measures against its present greenfield (majority) status, and overall, can be regarded as sustainable, and delivered in a way that does not compromise the viability of the scheme.
- 9.135 The approach to the scheme design is considered to be in accordance with the objectives of Policy SP19 Climate Change. Specifically to embed opportunities in design to reduce

⁶ Simplified Building Energy Model



carbon emissions (i), providing for adaptation for climate change in the design process (iii), and promoting energy efficiency (iv).

- 9.136 In response to Policy RE1 Development and renewable energy the scheme embeds carbon efficiency in its design process. The only renewable energy approach taken forward as specified in the LZC Report are air source heat pumps (7.4), the other potential option suited to this proposal, photovoltaic (7.3), is not taken forward. Reason to exclude photovoltaics is that installation would come at the expense of space available for roof lights and therefore passive natural lighting, and that the development can meet Part L, Planning and BREEAM ENE04 through passive design and low carbon technology alone (7.3).
- 9.137 Other measures for solar water heating (7.1), wind turbines (7.2), biomass boiler (7.5) and fuel cell (7.6) are considered by rejected for use in the project as set in the LZC Report.
- 9.138 The proposal therefore appropriately responds to consideration of renewable energy as Policy RE1 seeks.
- 9.139 FIREM as developer, will support relevant planning condition(s) to demonstrate compliance with the BREEAM excellent target.

Heritage and archaeology

- 9.140 The application site does not contain any statutory or non-statutory designated heritage asset by reference to online records provided by Coflein, the National Monuments Record of Wales (NMRW). There are four designated assets of heritage importance located within 1km of the site, shown on the Heritage Assets Plan, at Appendix 2, namely:
- Chapel House farmhouse (ref. 1597), Grade II listed, c. 440m from the eastern site boundary;
 - St Paul's Church, Isycoed (ref. 17815), Grade II listed c. 660m from the eastern site boundary;
 - The Plough Inn, Isycoed (ref. 1598), Grade II listed c. 730m from the eastern site boundary; and
 - Cobham Cottage, Isycoed (ref.15912), Grade II Listed c. 840m from the eastern site boundary



[All distances as crow flies measured to closest site boundary at southeast]

Details of the four listings are also provided at Appendix 2.

- 9.141 It is considered that the proposed development will have no physical impact beyond its development limits and it is notable that all four designated assets lie to the east / southeast of the site beyond the B5130 and will be separated from the built element of the development proposals by the ecological zone to the eastern area of the site as well as other fields and properties between the site edge and the relevant heritage asset curtilages. This degree of separation and the nature and character of the heritage assets leads to consideration that there is unlikely to be a direct or indirect impact on those assets from the proposed development, and certainly not a likely significant effect.
- 9.142 Search of the Archwilio Historic Environment Record (HER) Wales identifies no recorded entry on the HER within the site boundary. There are a number of entries to the south and east within a 500m radius of the site boundaries. These are set out the Heritage Assets Map and aerial photo at Appendix 2 and are as follows taken from southwest to northeast in an anti-clockwise direction:
- 118964 Isycoed, half groat of Edward (heavily clipped) – medieval find in 2005
 - 61515 Maelor Saesneg pond 498, post medieval pond, probably a former marl pit
 - 61514 Maelor Saesneg pond 497, post medieval pond, probably a former marl pit
 - 61513 Maelor Saesneg pond 496, post medieval pond, probably a former marl pit
 - 61512 Maelor Saesneg pond 495, post medieval pond, probably a former marl pit
 - 128257 Barn Farm, ridge and furrow, medieval captured from LIDAR (Silvester, R, 2013)
 - 145739/145740 Barn Farm potential traditional farm building, post medieval period; (potential duplicate entry as description and location same)
 - 70343 former Mashley Farm, post medieval traditional farm building, recorded prior to demolition in 1988
- 9.143 The above listed assets of limited and local importance and the degree of separation, nature and character of the development will not lead to any impact on the assets.



- 9.144 There are no Scheduled Monuments within the vicinity of the site accorded to search of CADW records.
- 9.145 There are further records to north beyond Ridley Wood Road and to the west within the wider industrial estate, but given the separation and intervening development, including the new warehouse development to the north of the site, it is considered unnecessary to record these here.
- 9.146 It is anticipated that there may archaeological remains relating to recent industrial period for the former Owens Corning Fibreglass Factory to the west / south (central) area of the site. Such remains are considered likely to be of only local significance and of low value. Such matters can be recorded through an agreed Written Scheme of Investigation to be secured pre-commencement of development through relevant planning condition. This approach can be applied to the rest of the site where intrusive development is proposed should any currently unidentified buried remains exist on site.
- 9.147 It is concluded that matters of heritage importance are unlikely to factor in the consideration of this planning application and no likely significant effects shall arise relevant to considerations under Policy SP16 Historic and Cultural Environment. Matters of archaeological importance can be assessed through a Written Scheme of Investigation which can set out the terms of a watching brief and/or evaluation trenching that can be secured by a relevant planning condition.

Waste management

- 9.148 Plan Red with FIREM has prepared a Waste Management Plan in support of the application.
- 9.149 The proposed development can be satisfactorily developed with regard to how waste generated by the proposed development, both during construction and operational stages, will be dealt with. Waste arisings from materials will be subject to controls set out in a Construction Environmental Management Plan which will apply the waste hierarchy to prevent, reuse, recycle, recover and dispose of wastes. This can be secured through an appropriate planning condition.
- 9.150 Operational stage effects on waste arising will be limited to the specific occupiers needs in warehouse / logistic, Class B8 use. This is not expected to give rise to hazardous waste or other controlled waste streams to give rise to any significant impact or mitigation



measures outside the use of an Estate and Tenant waste collection plans, which are outlined in the Waste Management Plan (section 5).

- 9.151 It is proposed that the Waste Management Plan will be conditionally approved and that prior to first operation of any unit a tenant waste management plan is provided for approval to demonstrate use in accordance with the principles.
- 9.152 On the basis of the approach set out on minimise waste arisings from the development through application of the waste hierarchy and the construction and operational stage management controls, the proposal accords with the principles of Policy SP18.



10 CONCLUSIONS

- 10.1 The application site is currently largely undeveloped. The area proposed to receive built development is located within the defined boundaries of the Wrexham Industrial Estate, the only area outside is the eastern fields which is proposed to receive only ecological mitigation works, suitable for the open countryside designation.
- 10.2 Though largely undeveloped, parts of the site have been previously developed in connection with the former Owens Corning Fibreglass Factory. Relevant mitigation for soil contamination will be undertaken through the enabling works to prepare the development platform.
- 10.3 FIREM proposes to erect up to 3 units for B8 use as warehouse & distribution units to meet identified market demand and to make best use of site formerly allocated for a large employment unit within the former UDP, and now designated as land within the industrial estate suitable to receive employment development.
- 10.4 The proposals will deliver significant social and economic benefits in the value of investment, creation of approximately 1,033 FTE permanent jobs and the value this brings back into the local economy. Additional social value is added through FIREM commitment in construction to support training and education for workers, including supporting programmes to address skills shortages and addressing unemployment.
- 10.5 Building design embeds carbon reduction through targeting of BREEAM Excellent and makes effective use of measures to maximise energy efficiency, to play its part in wider climate change policy objectives.
- 10.6 The findings of Landscape Visual Impact Assessment demonstrate that the site is able to accommodate the proposed commercial development without causing undue harm to the landscape character and visual amenity of the site and surrounding countryside and the footpath network. Residential receptors are only of medium sensitivity and by reason of significant separation over 250m from the site of proposed buildings, visual effect will be only moderate minor adverse, which we say is acceptable in context of the site's suitability to receive industrial development.
- 10.7 Landscape design will retain significant areas of existing tree, hedgerow and woodland along the site boundaries to east, north and west, in addition to significant new tree and



- hedgerow planting to supplement those boundaries, and within the eastern fields and area between the proposed units and Very Group Ltd buildings.
- 10.8 The proposals deliver significant ecological mitigation and benefits to protected species, including Great Crested Newts; and the retention, enhancement or creation of a range of habitats to support biodiversity and green infrastructure connectivity to the wider Industrial Estate and countryside.
- 10.9 FIREM is a significant landowner, developer and operator of employment units within the wider estate and is experienced in bringing forward employment schemes in which it takes long-term responsibility as landlord. FIREM commits to its role in implementing, managing and maintaining landscape and ecology mitigation measures set out in these proposals.
- 10.10 The site is not identified as an area of flood risk. Drainage design follows requirements to account for climate change and maintain a greenfield runoff rate into adjacent watercourses. On matter of phosphates at point of application there is an intention to follow Option 1 providing NRW review demonstrates headroom for phosphate treatment at the Gresford WwTW. If this is proven not to be the case the scheme design already accommodates and can be further adapted to meet Option 2 approach for additional onsite treatment to offset foul emissions.
- 10.11 The proposals can be safely accommodated on the existing local highway network and will support a range of measures to encourage future staff to make sustainable transport choices, including commitment through a Travel Plan and developer contribution to enhance public transport services and/or facilities. Expressed concerns over HGV uses of the B5130 is not considered to be well founded, but FIREM as landlord will be able to impose on tenants' requirements to route traffic away.
- 10.12 No other matter of air quality, noise and vibration, heritage and archaeology, waste management and soil quality indicate any reason for refusal of the proposal with no material harms arising, or harms that cannot be appropriately mitigated.
- 10.13 The development proposals can be considered a sustainable development which accord with a balanced assessment of relevant local development plan policies, and national policy and guidance, to which weight must be given, and should be granted planning permission.



Appendix 1

EIA Screening Opinion ENQ/2022/0353, issued 20/1/2023

RICHARD PURSER
PLAN RED

Your Ref/Eich Cyf	ENQ/2022 /0353
Our Ref/Ein Cyf	20/01/2023
Date/Dyddiad	Matthew Phillips
Ask for/Gofynner am	01978 298780
Direct Dial/Rhif Union	matthew.phillips@wrexham.gov.uk
E-mail/E-bost	

Dear Sir,

Town and Country Planning Act 1990

**SCREENING OPINION FOR PROPOSED EMPLOYMENT DEVELOPMENT
LAND EAST OF BRYN LANE WREXHAM INDUSTRIAL ESTATE, WREXHAM, .**

The above development falls within the scope of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. I have therefore completed an Environmental Impact Assessment Screening Opinion.

Having considered the details submitted as well as advice contained within Welsh Office Circular 11/99 I can confirm that the development will not need to be subject to an Environmental Impact Assessment. A copy of the screening opinion is enclosed with this letter.

Yours faithfully,



David Fitzsimon
Prif Swyddog Yr Economi a Chynllunio
Chief Officer Economy and Planning

STAGE 1 – INITIAL EIA SCREENING ASSESSMENT

1	Case Details	
A	Appeal case reference	
B	LPA case reference ENQ/2022/0353	
C	LPA Wrexham County Borough Council	
D	Appellant/Applicant FI Real Estate Ltd	
E	Site address Land East of Bryn Lane, Wrexham Industrial Estate.	
F	Brief description of development 93,019 sq.m of Class B8 flood space.	
G	Site area of development/works/new floorspace (as appropriate), i.e. m2 or hectares (Ha) 25.4ha	
H	Approval of reserved matters or conditions? If yes, state which one n/a	
I	If Yes, enter the description of development subject of the related planning permission	
2	EIA Screening Details	
2A	Schedule 1	
	Is the project Schedule 1 development as described in Schedule 1 of the EIA Regulations?	Choose an item.
	<i>If Yes, under which description of development i.e. Nos. 1 -21? Go to Section 8 and tick Recommended Action 8A/B 'EIA Required'. If No, consider whether project is 'Schedule 2' development below in part 2(B).</i>	
2B	Schedule 2	
(i)	Is the project listed as a description of development under Column 1 of Schedule 2 of the EIA Regulations?	Yes
	<i>If Yes, note under which description of development in Column 1 of Schedule 2 i.e. paragraphs 1-12. If No, go to Section 8 and tick Recommended Action 8L 'EIA Not Required' as the project does not fall within the EIA Regulations i.e. it is not Schedule 2 development and is not EIA development. Complete sections 3-5.</i>	
	10 (a)	

(ii)	Does the project change or extend development described in paragraphs 1 to 12 of Column 1 of schedule 2, where the change or extension may have significant adverse effects on the environment?	N/A
	<i>If Yes, provide reasons for your answer below. Proceed to point (iii).</i>	
	Choose an item.	
(iii)	Is the project located wholly or partly within a 'Sensitive Area' as defined by Regulation 2 of the EIA Regulations?	No
	<i>If Yes, state which area and proceed to Section 3, no need to consider thresholds/criteria. If No, proceed to point (iv) below.</i>	
(iv)	Are the applicable thresholds/criteria in Column 2 exceeded / met?	Yes
	<i>If Yes, note which applicable threshold/criteria and proceed to Section 3. If No, proceed to Section 8 and tick Recommended Action 8L 'EIA Not Required' as the project does not fall within the EIA Regulations i.e. it is not Schedule 2 development and is not EIA development. Complete sections 3-5.</i>	
	The area of development exceeds 5 hectares.	
3	LPA / Welsh Ministers' Screening	
	All applications including reserved matters/conditions	
(i)	Has the LPA issued a Screening Opinion (SO)?	Choose an item.
(ii)	Have the Welsh Ministers issued a Screening Direction (SD)?	Choose an item.
(iii)	If Yes to either, is a copy of the SO/SD on the file? Note which one.	Choose an item.
(iv)	If Yes, is the SO/SD positive i.e. EIA is required?	Choose an item.
4	Reserved Matters/Conditions Applications Only	
(i)	Was the original planning permission subject to EIA screening?	Choose an item.
(ii)	Was a SO/SD issued for the original planning permission?	Choose an item.
(iii)	If Yes, is a copy of the SO/SD for the original planning permission on file?	Choose an item.
5	Environmental Statement (ES)	
	Has the applicant/appellant supplied an ES for the current or previous (if reserved matters or conditions) application?	Choose an item.

Is a detailed screening assessment (Sections 6) required?

If Yes has been answered in response to either 2B(iii) or 2B(iv), send to relevant team to undertake detailed screening assessment.

If No has been answered for both questions, or the questions are not applicable, proceed to Section 7.

7 Options		
Assessment	Recommended Action	✓
Schedule 1 development	Letter 1. Issue direction stating EIA Required	
Schedule 1 development – appeal is at an advanced stage	Letter 2. Issue direction stating EIA Required	
Project does not fall within the EIA Regulations as either: (a) it is listed within the descriptions of development Column 1 of Schedule 2 of the EIA Regulations but does not meet relevant threshold criterion; or (b) it does not fall within the categories of development in Column 1 of Schedule 2 of the EIA Regulations.	Letter 3. EIA Not Required - Issue direction stating either: (A) project listed within descriptions of development in Column 1 of Schedule 2 of the EIA Regs but does not meet relevant threshold/criterion; or (B) project does not fall within the categories of development in Column 1 of Schedule 2 of the EIA Regulations.	✓

Sign-off	
Signature	Nick Atkinson
Date	20 th January 2023

STAGE 2 – DETAILED EIA SCREENING ASSESSMENT

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u> ? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
CRITERION 1. CHARACTERISTICS OF DEVELOPMENT		
Question 1(a) Size and design of the Development		
Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)?	Yes. The majority of the site is agricultural land. Small areas of the site are occupied by existing development, including a hard surfacing and two small buildings. The change to the site will be significant and comprehensive. However the site is located on the edge of the Wrexham Industrial Estate with existing development to the north and south as well as to the west. The extent of build development will no project into the countryside any further than existing developments either side. The urbanising effect will be localised when considering the site's context and therefore not significant in EIA terms.	Significant effect unlikely
Question 1(b) Cumulation with Existing and/or Approved Development		
Are there any other factors which should be considered such as: • consequential development which could lead to environmental effects?	The majority of the enquiry site has previously benefitted from outline planning permission for development (P/2008/0993) for the erection of a	Significant effect unlikely

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u> ? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
- the potential for cumulative impacts with other existing or planned activities in the locality? - any plans for future land uses on or around the location which could be affected by the project? - transfrontier impacts?	22,153 sq.m warehouse building. The site has also benefitted from a now expired Development Consent Order (DCO) application for the erection of a gas-fired power station (P/2012/0837). The land to the north has recently been development for a large warehouse development. This development together with the proposals subject to the Screening Opinion represent an extension to the Wrexham Industrial Estate, with both extending into greenfield land to the north and east of existing development. The land to the south is subject to an extant planning application (P/2022/0017) for B2/B8 development although the site lies within the UDP settlement boundary for the Industrial Estate. The submitted details suggest the buildings could be up to 30m high, which will be higher than the majority	

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u> ? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
	of buildings within the Industrial Estate. However buildings within the Kelloggs site (excluding the existing cooling towers) which are located on the opposite are of a comparable height. Visually the existing and proposed developments are/will be viewed in the context of existing industrial estate from both near and longer distance view points and consequently do not represent a significant intrusion into the wider landscape. There will be additional traffic and potential for noise. These impacts are also likely to be relatively localised and when considered in the context of the existing industrial estate, unlikely to be significant in EIA terms,	
Question 1(c) Use of Natural Resources, in particular land, soil, water and biodiversity		
Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply?	Yes. Water and energy will be used during the construction phase as well as once the building is occupied. The development will also	Significant effect unlikely

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u> ? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
	use resources through the transporting products for storage at the site and on-ward distribution. The scale of resource use is unlikely to be of more than local significance. Best practice employed by the developments of the site can minimise energy and water use. The use of the development is likely to use energy. Given the nature of the proposed development, particularly when considered in the context of the wider industrial estate, the impacts are unlikely to be significant in EIA terms.	
Question 1(d) Production of Waste		
Will the Project produce solid wastes during construction or operation or decommissioning?	Yes. Solid waste is likely to be generated during construction, however it is realistic to conclude that best practice techniques will be used during construction to minimise the generation and disposal of solid waste. The use of the building is unlikely to	Significant effect unlikely

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u> ? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
	generate solid wastes.	
Question 1(e) Pollution and Nuisances		
Will the Project involve use, storage, transport, handling or production of substances or materials which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?	No. Given the nature of the development, it is considered unlikely that significant quantities of materials that are harmful to the environment or to human health will be used, stored, transported, handled or produced either during construction or once the development is in use.	Significant effect unlikely
Will the Project cause noise and vibration or release of light, heat energy or electromagnetic radiation?	Yes. Noise and vibration is likely to occur during construction. However the effects would be localised and time limited. Best practice techniques can also be expected to minimise impacts. Given the nature of the development, there is potential for some noise to be generated when transporting materials in or out of the warehouse as well as the operation of any ancillary plant. Noise impacts will be localised both in terms of extent and frequency and will not be significant in EIA terms.	Significant effect unlikely

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u> ? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
Will the Project release pollutants or any hazardous, toxic or noxious substances to air , or lead to risks of contamination of land or water (including surface waters, groundwater, coastal waters or the sea)?	Yes. There is potential for dust pollution during construction however it can be reasonably concluded that best practice techniques would be employed to minimise this. In any case, dust impacts would be localised in scale and extent. Once in use the project is unlikely to release pollutants or hazardous substances given the proposed use of the building.	Unlikely significant
Question 1(f) Risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge		
Will there be any risk of major accidents and/or disasters during construction or operation of the development?	There is a risk of accidents during site construction. The risks are considered to be localised and would be minimised by adoption of best practice techniques by site contractors. There will be the risk of accidents associated with the operation of the development. However the site will need to operate in accordance with Health and Safety legislation. Given the intended use, the risk of accidents arising from the development is not considered	Unlikely significant

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
	significant in EIA terms.	
Question 1(g) Risks to Human Health (for example due to water contamination or air pollution)		
Will there be any risk to human health during the construction and/or operation of the development	Yes. There is a risk to human health from dust arising from construction works. However as noted above, using best practice techniques means these risks are low in EIA terms.	Unlikely significant
CRITERION 2. LOCATION OF DEVELOPMENT		
Question 2(a) Existing and Approved Land Use		
Will the Project result in social changes, for example, in demography, traditional lifestyles, employment?	No.	n/a
Are there any routes or facilities on or around the location, which are used by the public for access to recreation or other facilities, which could be affected by the project?	No.	n/a
Are there any transport routes which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	Yes. Additional traffic generated by the development has the potential to result in/add to congestion at the A5156/A534/Holt Road roundabout and the A5136/Chester Road/A483 junction at peak times. However the impacts are relatively localised. At TA has been undertaken that concludes that there are no highway safety reasons why the development should not take place and that there would be a negligible impact on the	Unlikely significant

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u> ? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
	highway network. Given the nature of the development it can reasonably be expected that HGV and other distribution vehicles would not necessarily need to access the site at peak hours, with movements spread out throughout the day and night. Traffic generated by staff movements to/from the site is unlikely to be significant in the context of traffic generated by the wider Industrial Estate. As such the impacts of the development on transport routes is not considered significant in EIA terms.	
Is the project located in a previously undeveloped area where there will be loss of greenfield land?	Yes. The majority of the site is greenfield land. The change to the site will be significant but the impacts are localised and would not be significant in the wider context.	Unlikely significant
Are there any areas on or around the location occupied by land uses which could be affected by the project, particularly sensitive land uses e.g. hospitals, schools, places of worship, community facilities?	Yes. There are residential properties around 50m to the east of the red line boundary but in excess of 250m from where the plans show	Unlikely significant

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u> ? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
	built development taking place. The properties would be sensitive to noise, dust and vibration during construction and also to noise when the development is in use. Construction impacts will be relatively short term and best practice measures put in place to limit construction hours and to minimise other impacts. Given the intended use, the principle noise risk would be from vehicles arriving, parking, turning, loading and unloading. The impacts are unlikely to be significant in EIA terms given the distances involved. Measures to mitigate/minimise impacts can also be incorporated into the design of the site and buildings and secured by planning condition.	
Question 2(b) Relative Abundance, Availability Quality and Regenerative Capacity of Natural Resources in the Area and its Underground		
Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?	No. The Welsh Government Predictive Agricultural Land Classification map identifies the site as Grade 3b land.	n/a
Question 2(c) Absorption Capacity of the Natural Environment		
Are there any other areas on or around the location which are important or sensitive for reasons of their ecology, or are used by protected,	Yes. Wrexham Industrial Estate is an ecologically sensitive area, in	Unlikely significant

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For ‘Yes/Unknown’, are effects <u>likely</u> to be <u>significant</u>? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
important or sensitive species of fauna or flora, which could be affected by the project?	particular due to populations of Great Crested Newts. The development is likely to result in the loss of land where GCN have the potential to be present as well as the loss of features that provide connectivity to wider GCN habitat. The plans accompanying the Screening Opinion request show the provision of ecological corridors and a large area of ecological mitigation immediately to the east of the development. Subject to the implementation and long term management and maintenance of appropriate mitigation, the development is unlikely to significantly impact upon local populations of GCN. Conditions and/or Planning Obligations can be used to secure such measures. Trees and hedgerows within the site also have the potential to provide habitat for bats. The loss at site level is significant but not significant in EIA terms. Suitable habitable for bats can be provided/maintained in the ecological corridors/mitigation	

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u> ? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
	areas.	
Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?	Yes. The development will increase foul water flows that enter the River Dee via the waste water treatment works (WWTW) at Five Fords. The Dee forms part of the River Dee and Baka Lake Special Area of Conservation (SAC) and in January 2021, Natural Resources Wales (NRW) introduced stringent standards on the discharge of phosphorus into the SAC. Increases in phosphorus discharges into the SAC have the potential to cause damaging effects on the SAC. Whilst the WWTW has provision to remove a percentage of phosphorous from treated water, water entering the river from it will still contain phosphorous. The WWTW is operating within the limits of its existing consent but the consent itself is out of date and pre-dates the new more stringent targets. The development will therefore increase phosphorous entering the SAC and therefore	Unlikely significant

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u> ? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
	adversely impact upon it. By itself the development will not result in a significant increase in additional phosphorous entering the river and therefore any adverse impact will not be significant. Nevertheless the development could only proceed following the completion of a separate Habitat Regulations Assessment which concludes no adverse impact. This will only be possible where measures are in place to mitigate for the additional phosphorous. These will either be delivered by way of upgrades to existing foul water infrastructure or other mitigation measures that developers will need to contribute to financially or deliver directly themselves. Accordingly there is adequate regulation in place to ensure no adverse impact on the SAC.	
Are there any areas or features of high landscape or scenic value on or around the location which could be affected by the project?	No. The site is not subject to any local or national landscape designations.	n/a
Is the project in a location where it is likely to be highly visible to many	Yes. The site will be visible to those	Unlikely significant

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u> ? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
people?	passing on adjoining roads and footpaths within the Industrial Estate as well as from residential properties to the east. However the site is not prominently located in the wider landscape and, despite the height of the proposed buildings, will be viewed in the context of its edge of urban location and adjoining industrial development. The impacts are therefore localised in nature and not significant in EIA terms.	
Are there any areas on or around the location which are densely populated or built-up, which could be affected by the project?	Yes. The site adjoins existing development within the Wrexham Industrial Estate. Whilst the development would extend built development into greenfield land and would also irreversibly change the character of the site, its scale and the associated urbanising effects are local in nature and are not considered to be significant in an EIA context.	Unlikely significant
Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project?	Yes. There are a number of listed buildings and scheduled monuments in the wider area, though none would be directly impacted given the degree of separation.	Unlikely significant

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u> ? State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.
	There are no listed buildings or scheduled monuments on the site itself or on land immediately adjoining it. As such significant effects are unlikely.	
Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	No	n/a
Is the project location susceptible to subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions, which could cause the project to present environmental problems?	No.	n/a
Has there already been a failure to meet environmental quality standards that is relevant to the project?	No.	n/a

Statement of reasons – insert into Screening Direction

The development will give rise to noise, vibration and dust impacts during construction and potentially noise during operation. The development will also generate traffic. These impacts will be localised and not significant in EIA terms. The development will have a significant impact upon the appearance of the site but wider landscape impacts will not be significant, the site being viewed in the context of the adjoining Wrexham Industrial Estates, again the impacts not being significant in EIA terms. Potentially adverse impacts upon protected species can be mitigated by measures agreed by condition and obligation. The development does however have the potential to adversely impact upon the River Dee and Bala Lake SAC due to additional phosphorous discharged. By itself the development will not result in a significant increase in additional phosphorous entering the river and therefore any adverse impact will not be significant. The development could only proceed following the completion of a separate Habitat Regulations Assessment which concludes no adverse impact. This will only be possible where measures are in place to mitigate for the additional phosphorous. These will either

be delivered by way of upgrades to existing foul water infrastructure or other mitigation measures that developers will need to contribute to financially or deliver directly themselves. Accordingly there is adequate regulation in place to ensure no adverse impact on the SAC.

In light of the above EIA is not required.

6		Outcome of assessment	
(ii)	If a SO/SD has been provided do you agree with it?	N/A	
(iii)	Is EIA required?	Yes	
Outcome		Action	✓
Schedule 2 development – threshold exceeded/ criterion met or Sensitive Area but not likely to have significant effects on the environment		Issue direction stating EIA Not Required	
Schedule 2 development – threshold exceeded/ criterion met or Sensitive Area and likely to have significant effects		Issue direction stating EIA Required	✓
Project does not fall within the EIA Regulations as either: (a) it is listed within the descriptions of development Column 1 of Schedule 2 of the EIA Regulations but does not meet relevant threshold/criterion; or (b) it does not fall within the categories of development in Column 1 of Schedule 2 of the EIA Regulations.		EIA Not Required - Issue direction stating either: (A) project listed within descriptions of development in Column 1 of Schedule 2 of the EIA Regs but does not meet relevant threshold/criterion; or (B) project does not fall within the categories of development in Column 1 of Schedule 2 of the EIA Regs	
Schedule 2 development but effects not clear at this stage – file to be reviewed at a later stage		No action – review when appropriate i.e. on receipt of new information/case progress	
Name and Job Title of Assessor		Matthew Phillips, Interim Head of Planning Policy	
Date of Assessment		20/01/2023	



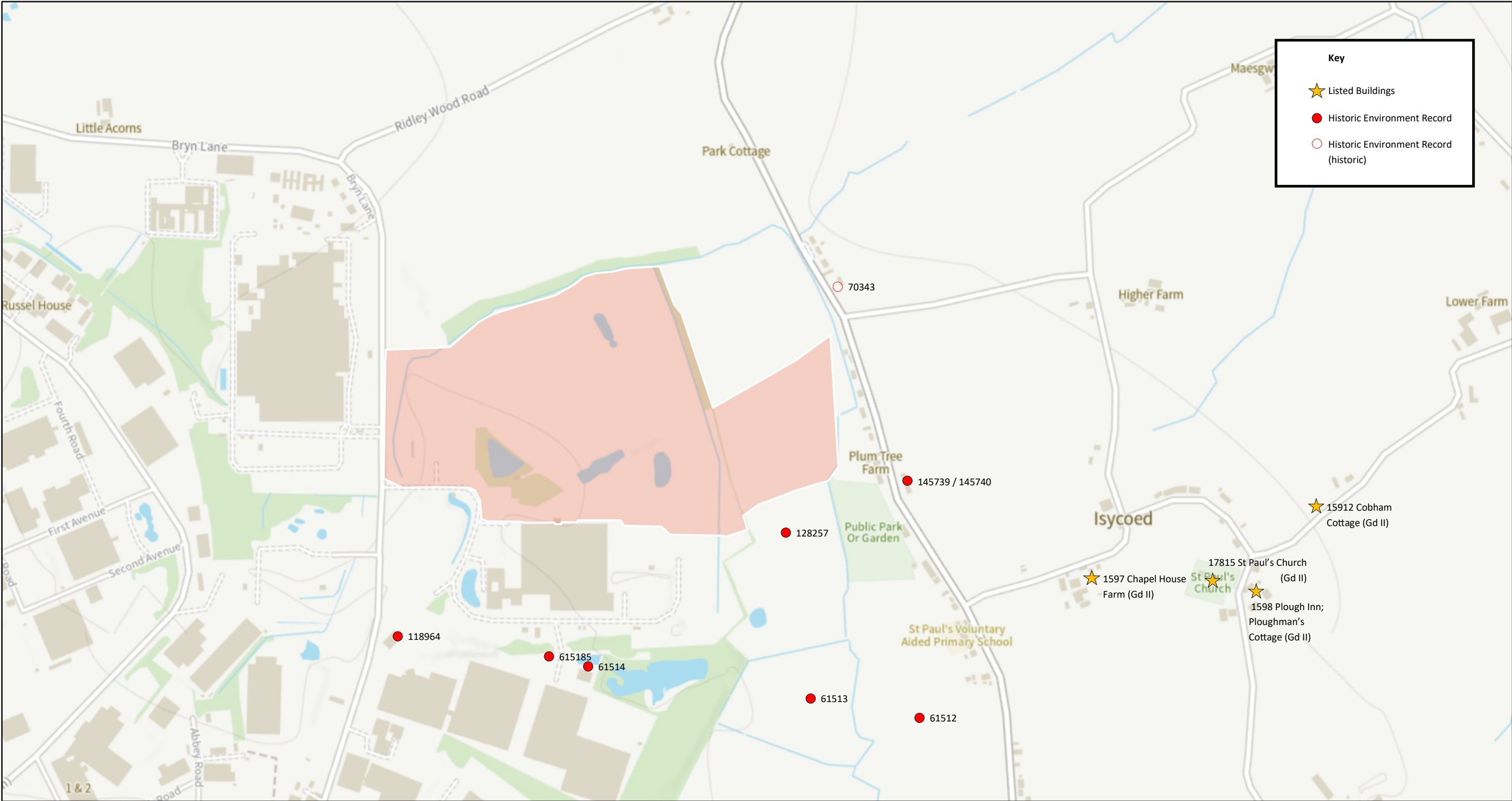
Appendix 2

Heritage Assets Plan

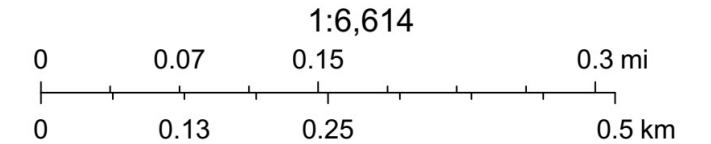
Listings extracts

Historic Environment Record (HER) extracts

Kingmoor Heritage Assets Plan



31/10/2022, 15:32:14



Full Report for Listed Buildings



Summary Description of a Listed Buildings

Reference Number	Building Number	Grade	Status	Date of Designation	Date of Amendment
1598		II	Designated	07/06/1963	20/06/1996

Name of Property	Address
Plough Inn PH	

Location

Unitary Authority	Community	Town	Locality	Easting	Northing
Wrexham	Isycoed		Isycoed	340482	350078

Street Side	Location
	Situated on the E side of a minor road opposite St Paul's Church, reached from a series of by-roads running S and SE of the B5130.

Description

Broad Class	Period
Commercial	

History

Exterior

History: The building originated as a 2-bay cruck-framed house, perhaps C15 or C16. It was remodelled C17 when a floor was inserted and the roof and walls raised. The attached outbuilding may be contemporary with this phase. The present external character is the result of alterations and additions late C19 and C20.

Exterior: Brick, render, timber-framing and mock timber-framing, slate roof, rendered chimneys. 1 storey with attic. Elevation to road has offset gabled porch flanked by windows with red brick surrounds; upper floor has decorative mock timber-framing and there are 3 gabled dormers. A lower range with a first floor loading door is attached to left. The top of a cruck truss is visible in the left hand return gable end.

Interior: The entrance gives to a room with roughly chamfered primary and secondary ceiling beams. The truncated remains of cruck blades are visible between this room and a later addition to the right. The upper floor has simple plank and latch doors and the northernmost and central cruck trusses are visible. Both have collars and trenches where purlins were removed; the central truss is arch braced.

Listed for the special interest of its interior retaining well-preserved cruck trusses and as a good illustration of development to a storeyed building.

Reference: E Hubbard Clwyd 1986 p184

Interior

Reason for designation

Full Report for Listed Buildings



Summary Description of a Listed Buildings

Reference Number	Building Number	Grade	Status	Date of Designation	Date of Amendment
15912		II	Designated	23/03/1995	20/06/1996

Name of Property	Address
Cobham Cottage	

Location

Unitary Authority	Community	Town	Locality	Easting	Northing
Wrexham	Isycoed		Isycoed	340638	350256

Street Side	Location
	Set back from the N side of a minor road, reached from a series of by-roads running S and SE from the B5130.

Description

Broad Class	Period
Domestic	

History

Probably built C17, the house was partially reconstructed in brick perhaps C18. The front and side elevations were

covered with scribed render, probably early C19. C19 and C20 alterations.

Exterior

Render on brick and timber frame, scribing visible on left hand return elevation; stone plinth, slate roof with red ridge tiles and rendered chimney to left. 1 storey with attic. Central entrance with gabled porch, 1 C20 window on each side. Low brick extensions to both sides, that to the right probably of C18 origin. A heavy post is visible in the right hand return elevation. Rear has exposed brick of at least 2 phases resulting from successive rebuilding of the timber-frame, and 2 windows, one blocked.

Interior

2 rooms per floor, one with a heavy chamfered beam and wide fireplace with a simple staircase to left. Other beams and partitions are blocked in but the inner wall is said to be timber-framed. Timber framed gable end of house is visible in the attic of the C18 outbuilding.

Reason for designation

Listed as a relatively well-preserved small house of the period.

Full Report for Listed Buildings



Summary Description of a Listed Buildings

Reference Number	Building Number	Grade	Status	Date of Designation	Date of Amendment
17815		II	Designated	20/06/1996	20/06/1996

Name of Property	Address
Church of St Paul	

Location

Unitary Authority	Community	Town	Locality	Easting	Northing
Wrexham	Isycoed		Isycoed	340404	350102

Street Side	Location
	Situated in a rectangular churchyard on the W side of a minor road, reached from a series of by-roads running S and SE of the B5130.

Description

Broad Class	Period
Religious, Ritual and Funerary	

History

A church is first recorded on the site in 1715; it was rebuilt 1742 and the present building was designed by John Butler

and built in 1829 at a cost of £700. Side doors and adjacent windows were blocked and the interior reordered later C19.

Exterior

Simple late Georgian style. Brown brick in flemish bond with light headers to give a chequered effect. Slate roof, hipped at E end. Rectangular plan with projecting sanctuary E end, slightly projecting tower W end. Dentil eaves cornice, windows in tall openings with round heads and stone sills are generally multipaned cast iron. N and S sides have a range of 5 windows with a blocked round headed door and window towards the W end. Tower has central arched door, there are brick and stone string courses, the penultimate stage has louvred bell openings in the N and S faces and a blind circular opening with a stone surround, probably for a clock, in the W face. There are damaged stone finials at the corners. The top stage is octagonal with a domed lead roof surmounted by a weather vane which has pierced lettering: LIRE CW 1742.

Interior

Vestibule in tower leads to nave which has a boarded ceiling, there is a shallow sanctuary with a low arch, a W gallery supported by simple cast-iron columns and a baptistry at the W end with a floor of encaustic and glazed tiles and a simple octagonal stone font. Furnishings are pitch-pine of later C19 character, organ by Bevington & Son of London, glass in E window is by Swaine Bourne of Birmingham. Arched opening at NW end leads to stairs to gallery which has original box pews with painted numbers.

Reason for designation

Listed as a good example of an earlier C19 church.

Full Report for Listed Buildings



Summary Description of a Listed Buildings

Reference Number	Building Number	Grade	Status	Date of Designation	Date of Amendment
1597		II	Designated	07/06/1963	20/06/1996

Name of Property	Address
Chapel House Farm House	

Location

Unitary Authority	Community	Town	Locality	Easting	Northing
Wrexham	Isycoed		Isycoed	340209	350104

Street Side	Location
	Set back from the S side of a minor road reached from a by-road running SE from the B5130.

Description

Broad Class	Period
Domestic	

History

Exterior

History: Built perhaps C15 or c16 as a cruck house. The roof was and walls were raised and a range added at right angles, probably late C18 or early C19.

Exterior: Sub-medieval cruck-framed dwelling now cross-wing to late C18/early C19 brick and timber framed house. Brick, timber framing, slate roof (partially removed), brick chimneys. L-shaped plan, 2 storeys. Elevation to yard is brick with a central area of square-panelled timber framing of very light scantling with brick nogging. 3 tripartite casement windows per floor, 2 entrances, one to left and the other off-centre to right. Low brick-built outbuilding attached to left. Rear has projecting range to right with a full-height cruck truss visible in the gable end. The framing is infilled with bricks and there are angle struts. Timber framing of very light scantling extends from the outer faces of the cruck blades on each side to give higher walls and roof pitch.

Interior not accessible at time of 1996 survey but is said to be in state of partial collapse.

Listed as a surviving example of a cruck house with later extensions of interest.

Reference: E Hubbard Clwyd 1986 p184

Interior**Reason for designation**



Extract: Archwilio Historic Environment Record (HER)