

26 May 2023

Gwyn Humphries
Senior Planning Officer
Wrexham County Borough Council

By email only

Dear Gwyn

P/2022/1052 – Dragon Packaging, Wrexham Industrial Estate

Further to consultee comments with this letter I enclose the following drawings and documents:

- 1211-02-002-Rev G Proposed Site Plan, prepared by MCAU Architects
- 224/L/100 Rev P01.1 Landscape and Biodiversity Proposals Plan, prepared by MD Landscaping
- 224/L/400 Rev P01.1 Schedule, Specification and Implementation Plan, prepared by MD Landscaping
- 224/T/100 Rev P02 Arboricultural Impact Assessment – Tree Retention, Pruning and Removal Plan, prepared by MD Landscaping
- 224/T/200 Rev P02 Arboricultural Method Statement – Tree Protection Plan, prepared by MD Landscaping
- Amphibian Conservation Plan (ACP) & Landscape Ecological Management Plan (LEMP), prepared by UES

The Proposed Site Plan and four Landscape and Arboricultural Plans and details replace previously submitted versions for approval. The ACP & LEMP is an additional document for approval.

Commentary

The revised site plan is a result of an iterative design process following initial consultee comments and internal advice from scheme ecologists, UES, to rationalise the service yard and parking to minimise land take to both reduce loss of existing landscape features and to provide greater space to accommodate biodiversity enhancement on site. Related to this is also provision of onsite drainage features, including rain gardens as part of site-wide drainage proposals to both mitigate surface water drainage and remove phosphates from surface water discharge through the rain garden filtration.

The revised layout maintains an operational yard area for the turning of HGVs, maintains the planned parking at 39 spaces and the existing and proposed access arrangements. The rearrangement reduces the loss of tree cover in Group G2 which can be seen in comparing the original and revised tree retention plans. This is to the betterment of the objectives of the SP10 designated area west of the existing entrance. The parking as can be seen is effectively handed to the east side, but the depth of the yard is also lessened when you compare the Rev G to Rev E layout.

We will be separately forwarding the revised drainage information being prepared by Bradley Marshall and this is linked to ongoing dialogue with your colleagues Matthew Phillips and Chris Smith on wider phosphates discussion and approach to applications. The intention is the drainage strategy at Dragon Packaging will work within the approach being discussed and achieve an onsite net neutrality. The intention is to submit the detail for approval on the application once the approach is agreed.

The ACP and LEMP as set out in the document addresses the comments received from NRW and Emma Broad. I will leave you to read this through and receive any revised comments from them both through re-consultation. Assuming agreement the conclusions set out in section 6 a management schedule which draws on earlier findings and would be a suitable place to compose planning conditions. This would include:

- Eradication of invasive species,
- Tree protection measures,
- Approval of the associated tree / hedgerow / other planting details provided by MD Landscaping,
- Standard landscape condition dead, dying etc. replacement,
- Installation of bird and bat boxes,
- Creation of hibernacula habitat,
- Approval of ACP / LEMP submitted here and combined with the requirements in the NRW proposed condition 1 parts (i) to (viii)

Long-term management responsibility of the site and measures set out in LEMP will rest with the landowner, FI Real Estate Management Ltd. This means though the suggested NRW planning condition (part vi) a 25 year monitoring and surveillance responsibility can be applied on the landowner which will be enforceable. We would consider this meets the parallel comment from Emma Broad that a long-term management regime is required.

Next steps and timescales

The above plans and document will require re-consultation with NRW and Emma Broad. And we understand that once the revised drainage details are agreed (in principle at least) to submit this will require a further consultation with NRW and Welsh Water too.

Naturally, there is a desire to get a permission as soon as practicable, and from Dragon Packaging's perspective this has become an urgent business need. It has effectively at the very limit of operations onsite using temporary storage within trailers on the yard and it has advised FIREM that it must soon make a commercial decision to commit to the extensions or activate a break clause and relocate to a suitable, alternative premises. Though not is preference this would mean relocating away from Wrexham with no units currently available to meet its needs.

We would welcome any support to reach an early committee, should it be needed at all, even if it is a minded to approve to give officers delegated powers of sign-off, rather than wait to make a decision before every 'I' and 'T' has been dotted and crossed. As such it would be of great benefit to get to a committee in mid or late June.

I shall be away next week (29th May to 2nd June). If you need to contact us on any matter please contact John Francis at john@planred.co.uk or on 07415 030237 in my absence.

Yours sincerely,



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