

Planning Supporting Statement

Application for "Construction of electric vehicle (EV) charging site and associated infrastructure and works to create 20no.parking spaces on the car park and land associated with the Ramada Plaza Hotel, Wrexham".

IONITY GmbH

April 2023

Quality information

Prepared by	Checked by	Verified by	Approved by
Paul McConville Planning Consultant	Chris King Principal Planner	Craig Smith Associate Planner	

Revision History

Revision	Revision date	Details	Authorized	Name	Position
1	05/04/2023	Client Review			

Distribution List

# Hard Copies	PDF Required	Association / Company Name

Prepared for:

IONITY GmbH

Prepared by:

Paul McConville
Planning Consultant
E: paul.mcconville@aecom.com

AECOM Limited
Plumer House
Third Floor, East Wing
Tailyour Road
Crownhill
Plymouth PL6 5DH
United Kingdom

T: +44 (1752) 676700
aecom.com

© 2023 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") for sole use of IONITY GmbH (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

Table of Contents

1. Introduction	1
Overview	1
Planning Application Submission	2
Structure	2
2. The Site and Context.....	3
Site and Surroundings	3
Key Environmental Designations and Land Uses.....	3
Landscape and Ecology	3
Flood Risk.....	3
Heritage	4
Planning History.....	4
3. The Need for the Proposed Development	5
National Context	5
Local Provision	5
Site Selection.....	6
4. The Proposed Development	7
Design and Layout.....	7
The Infrastructure	8
Access and Parking.....	9
Drainage	9
Landscaping	9
5. Planning Policy Context.....	10
Wrexham Unitary Development Plan 1996-2011.....	10
Wrexham Local Development Plan 2013-2028: Composite Version Deposit Plan.....	11
Other Relevant Policy and Guidance.....	11
Planning Policy Wales (Edition 11, February 2021).....	11
Future Wales: The National Plan 2040	12
Wrexham Local Planning Guidance Notes	12
Electric Vehicle Charging Strategy for Wales: Action Plan (October 2021)	13
The Climate Change Act 2008.....	13
The Energy White Paper (2020).....	13
6. Planning Appraisal	1
Introduction to Planning Policy Themes	1
Theme 1: Principle of Development.....	1
Theme 2: Design and Access	2
Design and Layout (inc. Landscaping)	2
Access	3
Trees and Landscaping	3
Theme 3: Ecology and Biodiversity	4
Ecology and Biodiversity.....	4
Theme 4: Flood Risk and Surface Water Drainage	5
7. Summary and Conclusions.....	7
Appendix A Technical Drawings	1
Appendix B Site Photographs	4

Figures

Figure 1: Site Location Plan..... 1

Figure 2: Site Context Plan © Google Earth (2023)..... 3

Figure 3: Indicative Proposed Site Layout..... 7

1. Introduction

Overview

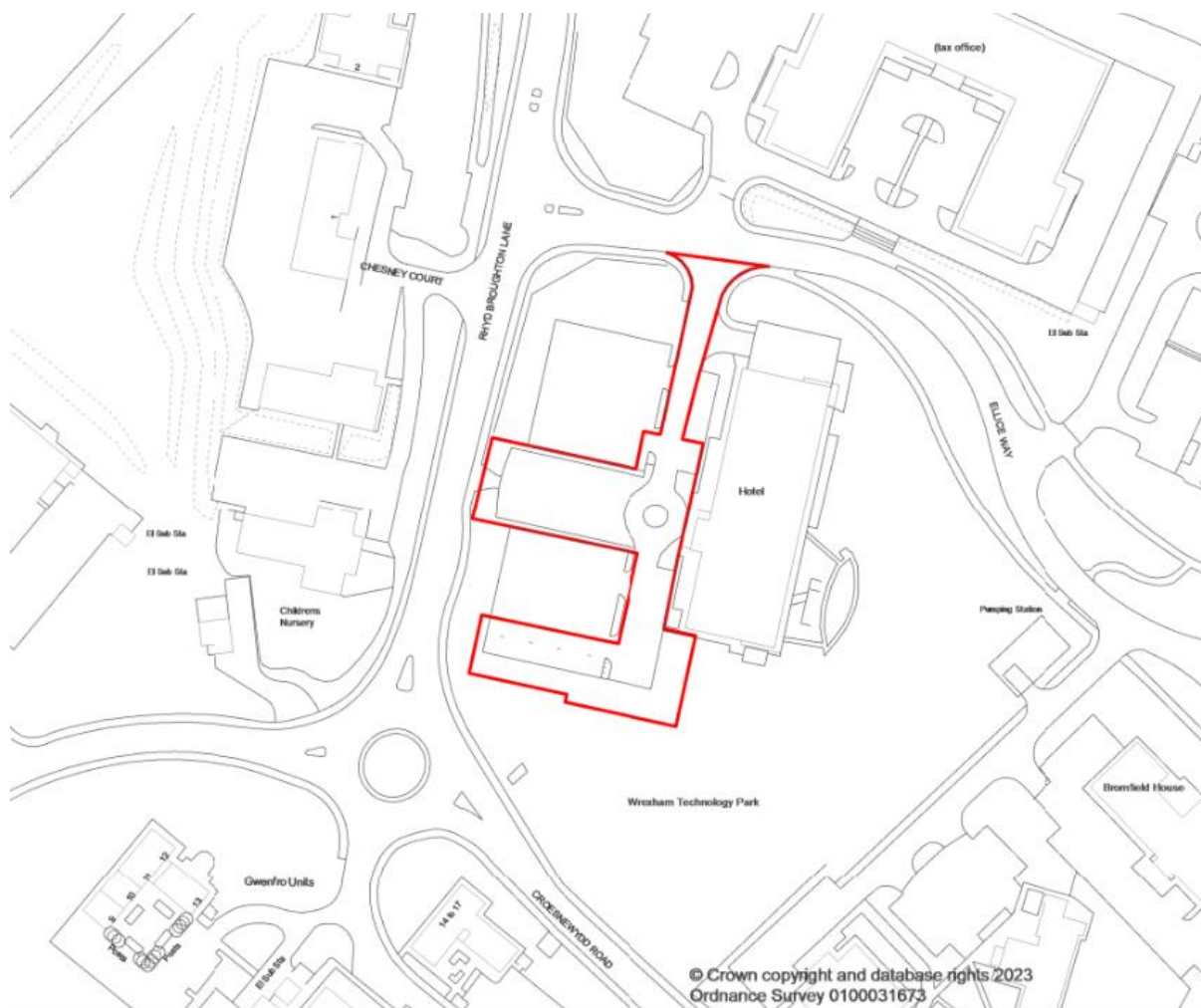
1.1 On behalf of IONITY GmbH (hereafter referred to as the 'Applicant'), AECOM have been instructed to pursue detailed planning consent for the development of 12no. electric vehicle (EV) charging stations, an electrical substation, associated equipment and works to create 20no.parking spaces (hereafter referred to as the 'Proposed Development') on the car park and land associated with the Ramada Plaza Hotel, Wrexham (hereafter referred to as the 'Site').

1.2 The formal description of the Proposed Development is as follows:

"Construction of electric vehicle (EV) charging site and associated infrastructure and works to create 20no.parking spaces on the car park and land associated with the Ramada Plaza Hotel, Wrexham."

1.1 Figure 1 identifies the Site and its immediate context.

Figure 1: Site Location Plan



1 | **Site location plan**
Scale: 1 : 1250



Planning Application Submission

1.2 In addition to this Planning Supporting Statement (PSS), detailed application drawings and technical supporting documents accompany the application and provide the information necessary to describe, assess and determine the application. The list of the documents submitted with the planning application are listed below:

- Completed planning application form;
- Site Location Plan (Ref: 60695026_ACM_CDE_WRE_DR_AR_1000_0.1);
- Site Layout Plan; Existing (Ref: 60695026_ACM_CDE_WRE_DR_AR_1001_0.1) and Proposed (Ref: 60695026_ACM_CDE_WRE_DR_AR_1002_0.2);
- Proposed Elevations (Ref: 60695026_ACM_CDE_WRE_DR_AR_1003_0.3);
- Landscaping Plans (Ref: 60695026-ACM-WRE-00-DR-LA-1001 and 60695026-ACM-WRE-00-DR-LA-1002);
- Surface Water Drainage Statement;
- Preliminary Ecological Appraisal (PEA) report; and
- Arboricultural report.

Structure

1.3 This PSS has been prepared in support of the planning application for the construction of an EV charging site, associated infrastructure and the development of 20no. new parking spaces. It presents a justification as to why the Proposed Development should be granted planning permission in accordance with relevant planning policies. The following sections are covered in this PSS:

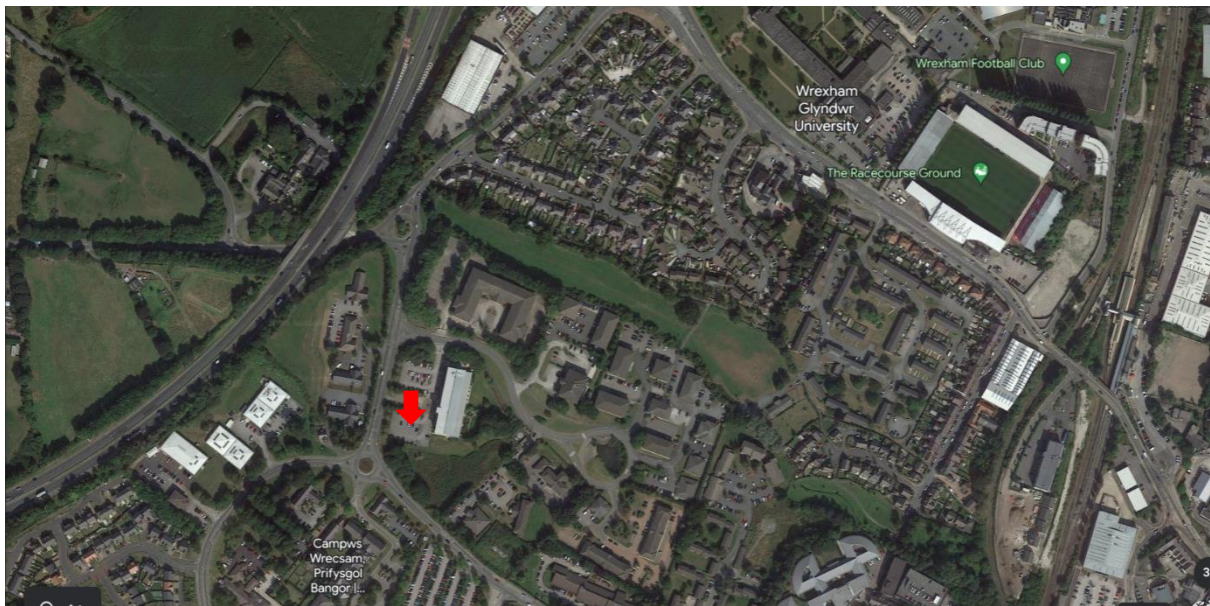
- Section two provides a detailed description of the Site and surroundings; environmental (and other) designations will be identified.
- Section three outlines the need case for the Proposed Development at a national and local level.
- Section four sets out the Proposed Development, outlining the details of the proposed infrastructure along with design, layout, access, drainage and landscaping details.
- Section five outlines the relevant planning policy documents and policies contained in the adopted development plan as well as other relevant material considerations.
- Section six evaluates the planning merits of the Proposed Development with an assessment against relevant planning policies.
- Section seven draws together conclusions on whether the Proposed Development accords with the adopted development plan.

2. The Site and Context

Site and Surroundings

- 2.1 The Site is located within the grounds of an existing hotel (Ramada Plaza Hotel) on the edge of Wrexham Technology Park on the west side of Wrexham, North Wales. The approximate national grid reference of the Site is 332219, 350731 (SJ 32219 50731). Adjacent land uses include nursery education to the west, whilst health services and businesses are located to the north, east and south.
- 2.2 The Site is approximately 0.28 hectares in size and is located within the administrative area of Wrexham County Borough Council.
- 2.3 As shown on Figure 2, the Site is located a short distance from the A483 and is accessed from the north off Elice Way.

Figure 2: Site Context Plan © Google Earth (2023)



Key Environmental Designations and Land Uses

- 2.4 Through a recent desk-based study, the following key environmental designations and land uses have been identified within or adjacent to the Site:

Landscape and Ecology

- The Site is not located within any landscape or ecological designations.
- Trees and hedgerow are located along the south boundary of the car park where the EV infrastructure is proposed. There are also rows of trees to the west of the hotel entrance, adjacent to the decorative paving and gravelled forecourt area. None of the vegetation on the Site is protected by a tree preservation order or by any other means.

Flood Risk

- According to Natural Resources Wales¹, the Site has been identified as being at a very low risk of fluvial flooding (land which has a chance of fluvial flooding of less than 0.1% each year) and at low risk to surface water flooding (land which has a chance of surface water flooding of between 0.1% and 1% each year).

¹ Geocortex Viewer for HTML5 (cyfoethnaturiolcymru.gov.uk) – Accessed 27/03/2023

Heritage

- There are no designated heritage assets within or directly adjacent to the Site. The nearest heritage asset is Croesnewydd Hall, a Grade II* listed building located approximately 150m southwest of the Site. The Site is not located within a Conservation Area.

Planning History

- 2.5 A desktop review of the Wrexham County Borough Council website has not identified any relevant planning history on the Site.

3. The Need for the Proposed Development

National Context

- 3.1 The shift to EVs is picking up pace in the UK, and with that comes the need for substantial expansion in EV charging infrastructure². In 2019, the UK was the third largest market for ultra-low emission vehicles (ULEVs) in Europe and is a global leader in their development and manufacture³. According to the Energy White Paper (2020), as of 30 June 2020, there were nearly 320,000 EV vehicles registered in the UK.
- 3.2 Today there are an estimated 660,000 EVs on the road in the UK, which demonstrates the rapid increase in EV popularity. By 2030, it is anticipated that there will be between approximately 8 million and 11 million EVs in the UK. As these vehicles come onto the market, a significant expansion of charging infrastructure will be required.
- 3.3 The Applicant, IONITY GmbH are a global company striving to meet the demand for EV charging through their provision of high-powered charging infrastructure. IONITY GmbH is a joint venture of the car manufacturers BMW Group, Ford Motor Company, Hyundai Motor Group, Mercedes Benz AG and Volkswagen Group with Audi and Porsche, along with BlackRock's Global Renewable Power platform as financial investor.
- 3.4 The Applicant's mission is to build, operate and grow their network of high-powered charging infrastructure along highways in 24 European countries. There are currently 18 IONITY GmbH charging locations operating within the UK, with a further eight in the process of being developed. By 2025 in the UK, the Applicant intends to quadruple the number of its charging stations, with a charging site every 60 to 80 miles on average.
- 3.5 A key benefit of the Applicant's charging sites is that they offer multiple charging points per location and chargers with up to 350kW charging capacity for ultra-fast charging. This superfast charging capacity exceeds that on offer at all other charging sites across the UK. Furthermore, the Applicant offers European charging standard Combined Charging System for the widest compatibility across EVs. The Applicant's charging network is open to all EV drivers across Europe, regardless of the car brand.
- 3.6 Significantly, the Applicant only select providers that generate electricity exclusively from wind, water, sun, and biomass, meaning that energy production is 100% renewable and IONITY users can be assured of completely carbon neutral driving.

Local Provision

- 3.7 Range anxiety still ranks as the number one reason for customers to hesitate with the purchase of an EV. Therefore, siting of IONITY GmbH charging infrastructure adjacent to major road networks is essential for the uptake of EVs.
- 3.8 A desktop study has been undertaken to establish the current provision of EV charging infrastructure in Wrexham. The study indicates that there is an EV charging location to the front of the Ramada Plaza Hotel which offers one low-powered charging point (7kW).
- 3.9 Within the administrative boundary of Wrexham, only two other charging locations have been identified within 1.5km of the A483. There is a charging location at the Breast Screening Centre, Wrexham Technology Estate, which offers two low-powered charging points (7kW). Whilst there is a charging location at the Catrin Finch Centre which also offers two low-powered charging points (7kW).
- 3.10 According to the EV Charging Strategy for Wales (2021)⁴, in 2020, there were thirteen charging locations in Wrexham; five of these were classified as 'rapid' whilst eight were classified as 'fast'.

² [Optimizing electric vehicle charger siting \(dnv.com\)](#) Accessed 27/03/2023

³ [Energy White Paper \(publishing.service.gov.uk\)](#) Accessed 27/03/2023

⁴ [Electric Vehicle Charging Strategy \(gov.wales\)](#) Accessed 27/03/2023

- 3.11 Given the existing low provision of charging infrastructure in Wrexham, there is a significant need to increase provision of EV charging infrastructure. Development of this Site with IONITY charging infrastructure would nearly double the existing provision of public EV charging points in the city.

Site Selection

- 3.12 Location is critical when considering the siting of EV charging sites, with locations adjacent to major roads tending to attract more usage.
- 3.13 The Site is in a strategic and conveniently accessible location off the A483 Carriageway adjacent to the Ramada Plaza Hotel. For EV drivers undertaking long journeys or travelling on the A483, the Site will offer convenient and quick charging adjacent to comfort facilities.
- 3.14 The Proposed Development offers a vastly different service to that on offer at the aforementioned charging sites in Wrexham; the ability to charge an EV to 50kW within nine minutes using a 350kWh charger or within 20 minutes using a 150kWh charger. Provision of such a high-powered charging facility close to a key transport corridor (A483) will provide confidence and convenience for EV drivers undertaking both long and short journeys in North Wales.

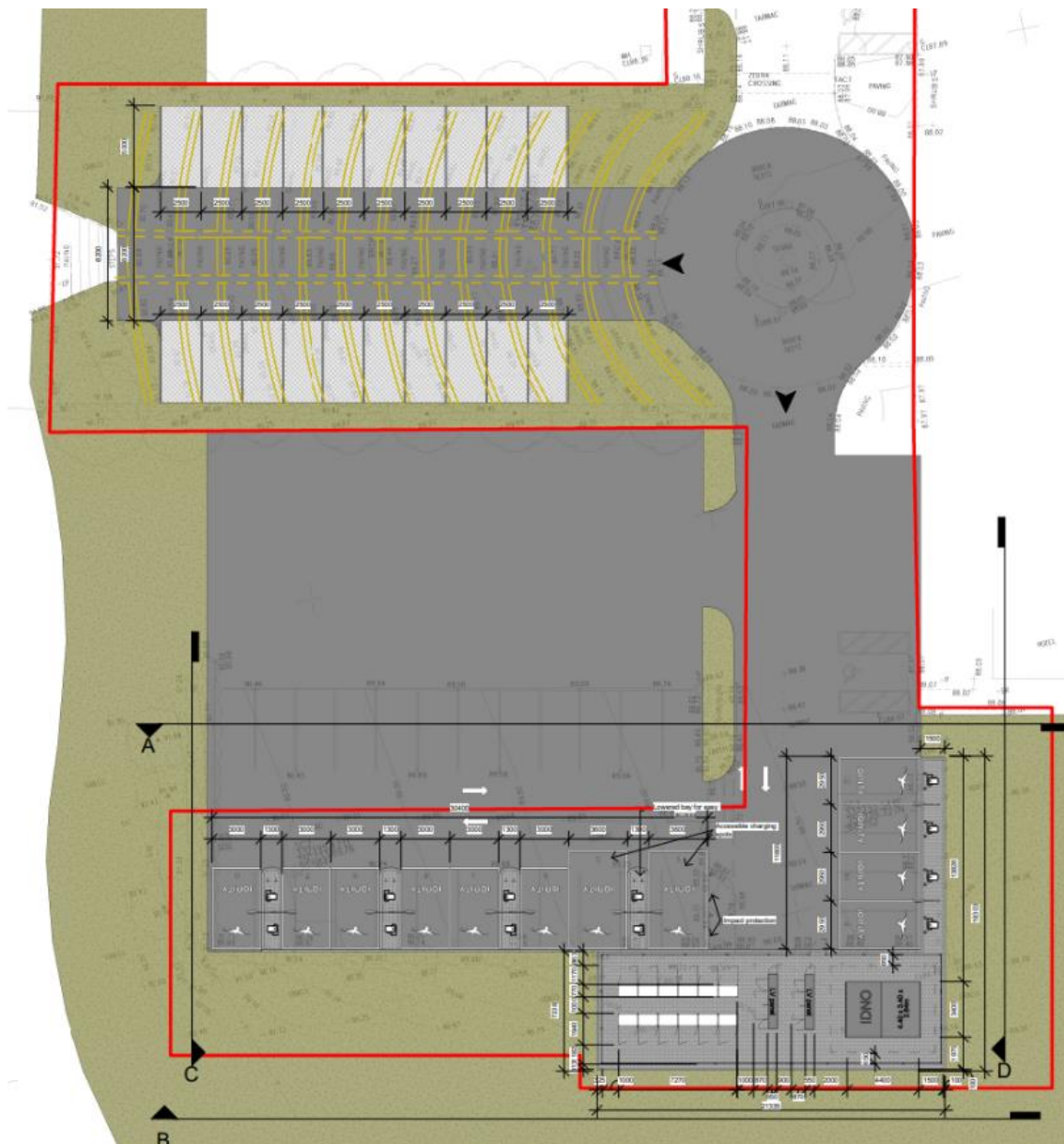
4. The Proposed Development

Design and Layout

4.1 As shown below in Figure 3, the Proposed Development involves the following works and equipment:

- 12no. IONITY EV charging units;
- electrical substation and associated infrastructure;
- reconfiguration of car parking bays to the south of the Site to create 12 EV charging bays inclusive of 10 regular parking bays (3m wide x 5m deep) and two accessible parking bays (3.6m wide x 6m deep);
- bollards and light poles;
- hardstanding (asphalt) of decorative forecourt to the west of the hotel entrance to create a replacement hotel parking area for 20 vehicles;
- associated landscaping and tree planting.

Figure 3: Indicative Proposed Site Layout



- 4.2 The high-capacity charging station stations, charger pylons and digital interaction concept are unique, simple and an attractive design. The simplistic, yet modern stations (as shown on Figure 4 and Figure 5) are iconic of the IONITY brand and are award winning in terms of their design and visual appearance.

Figure 4: Example of IONITY EV charging stations⁵



Figure 5: Example of pairs of IONITY EV charging stations at Cullompton services⁶



The Infrastructure

- 4.3 The Site will provide 12no. EV charging units and associated parking spaces. The proposed charging units are higher powered than other charging points in the UK. With a capacity of a 350kW charger, the IONITY infrastructure could charge an EV to 50kWh within nine minutes. Using an IONITY 150kW charger, a vehicle could be charged to 50kWh in 20 minutes⁷.

⁵ Source- Ionity Installing 324 ABB 350 kW Ultrafast Charging Stations In Its 2nd Phase – CleanTe

⁶ Source- <https://www.plugshare.com/location/287763> Accessed 27/03/23

⁷ WE ARE ON IT - Home (ionity.eu) Accessed 27/03/23

- 4.4 The speed and convenience of the IONITY charging point is significant when compared with other charging facilities. To similarly charge a vehicle to 50kWh, a high-powered public charger (50kW) would take one hour, a wall box charger (11kW) would take four hours 30 minutes, whilst a household plug (2.3kW) would take 22 hours⁸.

Access and Parking

- 4.5 The Site is located within the curtilage of the existing Ramada Plaza Hotel and can therefore be accessed through the existing access off Elice Way.
- 4.6 18 parking spaces associated with the hotel are being replaced by EV charging bays, therefore the area of decorative forecourt to the west of the hotel is to be re-laid as 20 parking spaces to compensate for those being repurposed.

Drainage

- 4.7 The accompanying Surface Water Drainage Statement confirms that existing surface water is currently drained from the car park and roadways via channel drains and road gullies. The main surface water sewer for the Site flows north beneath the access road to connect to the public sewer in Elice Way.
- 4.8 The EV charging area and the existing drainage system will not be altered. The walkway containing the new sub-station is to be paved with concrete tiles, this area will not be positively drained, and rainfall may run off this area onto the adjacent grassed and landscaped ground.
- 4.9 The new car parking area to the west of the hotel entrance will however involve a new drainage arrangement. As set out in the Surface Water Drainage Statement, surface water will be discharged to ground via a permeable paving within the new parking bays and temporary sub-surface water storage.

Landscaping

- 4.10 The accompanying Landscaping Plans (Ref: 60695026-ACM-WRE-00-DR-LA-1001 and 60695026-ACM-WRE-00-DR-LA-1002) demonstrate that in order to facilitate the provision of the twenty parking spaces to the west of the hotel entrance, twelve adjacent trees and two existing hedgerows are to be removed.
- 4.11 A further seven trees and the existing hedgerow at the south of the car park (32m long) will also be removed to make way for the proposed EV charging infrastructure and equipment.
- 4.12 As set out in the Arboricultural Report, of the nineteen individual trees that are to be removed, twelve are semi-mature trees classed as moderate quality, whilst the other seven trees are classified as low quality. The three partial hedges being removed are also classified as low quality.
- 4.13 To compensate for this tree removal, nineteen replacement trees are to be planted to the south and east of the proposed charging site as shown on Landscaping Plan (Ref: 60695026-ACM-WRE-00-DR-LA-1002). Further to this, a length of native hedgerow 76.5m in length will be planted south and east of the charging site.
- 4.14 The hedgerows that are being removed to carry out the works to the decorative forecourt will be replaced with new hedgerows made up of native species.
- 4.15 No incursions within the RPA of canopy spread of any retained trees will be required to facilitate the Proposed Development. Retained trees can be fully protected with tree protection fencing as detailed on the Tree Protection Plan attached as Appendix E in the Arboricultural Report.
- 4.16 All works and temporary tree protection fencing shall be carried out in adherence to best arboricultural practice and in accordance with BS3998 recommendations for tree work and BS5837 trees in relation to design, demolition and construction recommendations.

⁸ [WE ARE ON IT - Home \(ionity.eu\)](https://www.ionity.eu) Accessed 27/03/23

5. Planning Policy Context

- 5.1 The planning application falls to be determined by Wrexham County Borough Council as the local planning authority (LPA) in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. The LPA is required to determine the planning application in accordance with the adopted Development Plan and other material considerations, including national planning policy. The adopted development plans relevant to the Proposed Development and Site boundary are:
- Wrexham Unitary Development Plan 1996-2011
 - Wrexham Local Development Plan 2013-2028: Composite Version Deposit Plan with Focused Changes/ Minor Editing Changes (version to be examined by Inspector April 2019).
- 5.2 Other material considerations are expected to include but are not limited to:
- Planning Policy Wales (February 2021)
 - Future Wales: The National Plan 2040
 - Wrexham County Borough Council local planning guidance notes
 - EV charging strategy for Wales: action plan (October 2021)
 - Climate Change Act 2008
 - The Energy White Paper 2020
 - Other guidance and supplementary planning documents where these are considered relevant.
- 5.3 This section sets out a summary of the planning policy context, including the adopted Development Plan, plus relevant policies of other national and local policies that will be material considerations in the planning decision.

Wrexham Unitary Development Plan 1996-2011

- 5.4 The Wrexham Unitary Development Plan (UDP) outlines Wrexham County Borough Council's broad intention for development in the area and provides a framework for the more specific policies and proposals.
- 5.5 According to the Wrexham UDP, the Site is within employment zone 38 which is allocated for the establishment of high-quality employment development comprising high technology, manufacturing, research and development, and prestige offices.
- 5.6 The nature, scale and location of the Proposed Development is not contrary to the objectives of the policy allocation. It is therefore considered that the Proposed Development will be assessed against the following strategic policies:
- Policy PS2 and Policy PS3 (The Broad Location of Development)
 - Policy PS8 (Transport)
 - Policy PS11 (Biodiversity)
 - Policy PS12 (Renewable Energy)
 - Policy GDP1 (Development Objectives)
 - Policy EC4 (Hedgerows, Trees and Woodland)
 - Policy EC6 (Biodiversity Conservation)
 - Policy EC7 (Conservation Areas)
 - Policy EC12 (Development and Flood Risk)
 - Policy EC13 (Surface Water Run-off)
 - Policy T8 (Parking).

Wrexham Local Development Plan 2013-2028: Composite Version Deposit Plan

- 5.7 The Planning Inspector's report was published from Planning and Environment Decisions Wales in February 2023, signifying the end of Examination of the Wrexham Local Development Plan 2013-2028 (LDP). The Planning Inspector concluded that, with the recommended binding changes outlined in the report incorporated into the Wrexham LDP, the Plan satisfies the requirements of Section 64 (5) of the Planning and Compulsory Purchase Act 2004 and meets the tests of soundness set out in the LDP Wales.
- 5.8 When adopted, the Wrexham LDP will become the Development Plan for the County Borough of Wrexham and will provide a basis for decisions on land use planning in this area. It will supersede the Wrexham UDP.
- 5.9 Whilst the Wrexham LDP does not include any policies specific to the Site, it is considered that the Proposed Development will be assessed against the following strategic policies:
- Policy SP9: Economic Growth Employment and Enterprise
 - Policy SP12: Transport and Accessibility
 - Policy SP13: Design Principles & Masterplanning Framework
 - Policy SP15: Natural Environment
 - Policy SP16: Historic and Cultural Environment
 - Policy SP19: Climate Change
 - Policy SP20: Green Infrastructure
 - Policy DM1: Development Management Considerations
 - Policy NE3 Trees, Woodlands and Hedgerows
 - Policy EM3: Alternative Use of Employment Land and Premises
 - Policy T1: Managing Transport Impacts
 - Policy RE1: Development and Renewable Energy/Low Carbon Technology
 - Policy RE2 Renewable Energy Schemes.

Other Relevant Policy and Guidance

Planning Policy Wales (Edition 11, February 2021)

- 5.10 The national planning policies for Wales are set out within the Planning Policy Wales (PPW). The PPW was first published in December 2018 and most recently updated in February 2021. As the principal statement of national planning policy, the PPW has substantial weight in the decision-making process, particularly where a local development plan is out of date.
- 5.11 LPAs are required to base local development plans on the principles and policies of the PPW.
- 5.12 The primary objective of PPW 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. The following chapters and sections of the PPW are considered relevant to the Proposed Development:
- Section 2 – People and Places: Achieving Well-being Through Placemaking
 - Maximising Well-Being and Sustainable Places through Placemaking
 - Planning Policy Wales and Placemaking.
 - Section 3 – Strategic and Spatial Choices
 - Strategic Placemaking.

- Section 4 – Active and Social Places
 - Moving within and between places
 - Transport.
- Section 5 – Productive and Enterprising Places
 - Economic Infrastructure
 - Transportation Infrastructure
 - Economic Development
 - Energy
 - Reduce Energy Demand and Use of Energy Efficiency
 - Renewable and Low Carbon Energy.
- Section 6 – Distinctive and Natural Places
 - Recognising the Special Characteristics of Places
 - The Historic Environment
 - Green Infrastructure
 - Landscape
 - Biodiversity
 - Ecological Networks
 - Recognising the Environmental Qualities of Places
 - Water and Flood Risk
 - Air Quality and Soundscape
 - Lighting.

Future Wales: The National Plan 2040

- 5.13 'Future Wales – The National Plan 2040' is a 20-year national development plan that covers the whole of Wales. It has been produced by the Welsh Government and covers the period up to 2040.
- 5.14 The plan seeks to provide a strategy for addressing key national priorities through the planning system. The plan covers big issues including the economy, housing and environment. It shows where nationally significant developments like energy, transport, water and waste projects should take place, where growth should happen, what infrastructure and services are needed and how Wales can help fight climate change.

Wrexham Local Planning Guidance Notes

- 5.15 Wrexham County Borough Council have produced a series of local planning guidance planning notes with support the UDP policy.
- 5.16 The planning guidance notes which are considered relevant to the Proposed Development are:
- No.7 – Landscape and development
 - No.16 – Parking standards
 - No.17 – Trees and development
 - No.32 – Biodiversity and development.

Electric Vehicle Charging Strategy for Wales: Action Plan (October 2021)

- 5.17 In April 2021, Welsh Government published the EV Charging Strategy, setting out its plans for charging electric cars and vans in Wales. It is written within the context of Llwybr Newydd: a new Wales Transport Strategy and establishes an ambitious vision for charging in Wales.

“By 2025, all users of electric cars and vans in Wales are confident that they can access electric vehicle charging infrastructure when and where they need it”.

- 5.18 Four main outcomes are highlighted to achieve this vision: increased total charging provision, a quality charging experience, a sustainable approach (aligned with the decarbonisation agenda) and localised benefits.

The Climate Change Act 2008

- 5.19 The Climate Change Act 2008 (CCA 2008) establishes a legally binding target to reduce the UK's greenhouse gas emissions by at least 80% in 2050 from 1990 levels. To drive progress and set the UK on a pathway towards this target, the Act introduced a system of carbon budgets including a target that the annual equivalent of the carbon budget for the period including 2020 is at least 34% lower than 1990.

- 5.20 The CCA 2008 also requires the government:

- to assess regularly the risks to the UK of the current and predicted impact of climate change;
- to set out its climate change adaptation objectives; and
- to set out its proposals and policies for meeting these objectives.

The Energy White Paper (2020)

- 5.21 The Energy White Paper (EWP) sets out the government's policies and commitments to put the UK on course to net zero by 2050. The EWP contains the Prime Minister's ten-point plan for a green industrial revolution.
- 5.22 The EWP lists six strategic priorities for the transport decarbonisation plan, to deliver a net zero transport system. One of the strategic priorities is the 'decarbonisation of vehicles'. The government aim to support the transition to zero emission road vehicles through the provision of recharging infrastructure.

6. Planning Appraisal

Introduction to Planning Policy Themes

6.1 The following section presents an appraisal of the Proposed Development in accordance with the policy themes identified below:

- Theme 1: Principle of Development
- Theme 2: Design and Access
- Theme 3: Ecology and Biodiversity
- Theme 4: Flood Risk and Surface Water Drainage.

Theme 1: Principle of Development

6.2 Sustainable development is the core principle of national and local planning policy in the UK. The 'Future Wales: The National Plan 2040' policy document states:

"The Welsh Government will embrace the adoption of electric vehicles in an inclusive manner, supported by the necessary investment in charging infrastructure. We recognise this will be a greater challenge in rural areas. We are also promoting an increase in the generation of renewable energy to support the increased demand for electricity. The Welsh Government will increase the use of electric vehicles in public sector fleets, as well as encouraging innovative approaches to reducing emissions in all transport sectors."

6.3 Further to this, the PPW outlines support for EV driving and recognises that future advances in the technology will increase the uptake in EVs over the next 10 to 15 years. The PPW sets out support for the promotion of EVs and EV charging infrastructure in the following paragraphs.

6.4 PPW paragraph 4.1.40 states:

"To encourage the use of Ultra Low Emission Vehicles (ULEVs), the planning system should encourage and support the provision of ULEV charging points as part of new development. Future Wales sets out the Welsh Government's requirements for the provision of electric vehicle charging points for non-residential development."

6.5 PPW paragraph 5.7.13 states:

"Welsh Government planning policy recognises an energy hierarchy. The Welsh Government expects all new development to mitigate the causes of climate change in accordance with the energy hierarchy for planning, as set out in the following energy policies. Reducing energy demand and increasing energy efficiency, through the location and design of new development, will assist in meeting energy demand with renewable and low carbon sources. This is particularly important in supporting the electrification of energy use, such as the growing use of electric vehicles and heat pumps."

6.6 PPW paragraph 5.9.1 states:

"Local authorities should facilitate all forms of renewable and low carbon energy development and should seek cross-department co-operation to achieve this. In doing so, planning authorities should seek to ensure their area's full potential for renewable and low carbon energy generation is maximised and renewable energy targets are achieved."

6.7 The EWP sets out the government's policies and commitments to put the UK on course to net zero by 2050. Provision of EV charging is listed as one of the governments priorities to achieve this net zero goal.

"We will support the rollout of charging and associated grid infrastructure along the strategic road network, to support drivers to make the switch to EVs ahead of the phase out of the sale of new petrol and diesel cars and vans by 2030, and hybrids with significant zero emission capability by 2035."

6.8 At a local level, Draft Wrexham LDP policy RE1:

“In determining planning applications for renewable and low carbon energy development, decision makers must give significant weight to the need to meet Wales’ international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency.”

6.9 Strategic objective 10 of the Draft Wrexham LDP is to “Reduce carbon emissions and maximise our resilience to and mitigate and adapt to the impact of climate change”.

6.10 By the year 2030, it is anticipated that there will be between approximately 8 million and 11 million EVs in the UK. While it is difficult to know precisely how much charging will be needed, forecasts suggest that at least 280,000 to 480,000 public EV charge points will be required⁹. The Climate Change Act (2008) established a legal requirement for the UK to achieve an 80% cut in Carbon Dioxide emissions by 2050.

6.11 The UK government have therefore pledged through the Energy White Paper (2020) to support the rollout of charging and associated grid infrastructure along the strategic road network. The UK government recognise that the switch to EVs is a critical step towards achieving carbon neutrality and state through the Energy White Paper (2020) that the provision of EV charging infrastructure is essential to support drivers to making the switch to EVs ahead of the phase out of the sale of new petrol and diesel cars and vans by 2030.

6.12 The Welsh Government have set a target to generate 70% of consumed electricity by renewable means by 2030 to combat the climate emergency. EV driving can make significant strides away from harmful emissions towards carbon neutrality. The impact of EV driving is particularly significant when EV charging stations are powered from electricity from renewable energy sources.

6.13 The Applicant is a unique provider in that they use energy exclusively from the renewable energy sources such as wind, water, sun and biomass. Using such renewable energy, the Applicant is contributing to the growth of renewable energy, fossil fuel independence and a carbon neutral future¹⁰.

6.14 The Site will make effective use of the land in providing high-powered EV charging fuelled by renewable energy, which over the course of its lifespan will help the UK move towards a low carbon economy. As such the Proposed Development is in accordance with the principles and objectives set out in the PPW, the CCA2008 the EWP and Draft Wrexham LDP policy RE1.

Theme 2: Design and Access

Design and Layout (inc. Landscaping)

6.15 PPW paragraph 3.8 states that applications for development should be designed to a high quality and make a positive impact on the built and natural environment;

“Good design can help to ensure high environmental quality. Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places. This embraces the principles of ‘ecosystems services’ and sustainable management of natural resources where multiple benefits solution become an integral part of good design. In a similar manner, addressing environmental risks can make a positive contribution to environmental protection and improvement, addressing land contamination, instability and flood risk and providing for biodiversity, climate protection, improved air quality, soundscape and water resources benefit.”

6.16 At a local level, Policy SP13 (Design Principles and Masterplanning Framework) of the Draft Wrexham LDP sets out the design expectations for development proposals. Policy SP13 states;

“All development will be required to be of a high quality, sustainable design which makes a positive contribution to the creation of locally distinctive places by ensuring compliance with the masterplanning framework SPG and KSS schematics. Proposals must demonstrate how they

⁹ Final report - GOV.UK (www.gov.uk) Accessed 27/03/2023

¹⁰ WE ARE ON IT - Home (ionity.eu) Accessed 27/03/2023

have taken account of the local characteristics of surrounding areas and how innovative design solutions will enhance the quality of the built and natural environment.”

- 6.17 The Applicant's charging infrastructure design is award winning, collecting the Gold Medal / Product Design category in the prestigious 2019 iF World Design Guide Awards.
- 6.18 The Proposed Development will be visually attractive as a result of effective landscaping within and around the Site. The planting of native trees and hedgerows to the south and east of the proposed charging site will respect the local character and give the impression of a high-quality and sustainably designed place.
- 6.19 As such, from a design perspective, the Proposed Development is considered to be in accordance with the PPW design principles and Policy SP13 of the Draft Wrexham LDP.

Access

- 6.20 The Site has been designed in accordance with the local planning guidance note 16 (Parking Standards) and the Manual for Streets. Planning Guidance Note 16 sets out that the minimum dimensions for parking spaces. The Note states that regular parking spaces should be 2.4m x 4.8m minimum, whilst the minimum dimensions for an accessible space are 3.6m x 4.8m.
- 6.21 The dimensions of the proposed EV charging bays and new hotel parking spaces meet and exceed the minimum sizes of parking spaces set out in Planning Guidance Note 16.
- 6.22 The EV charging bays and new car parking area have been designed to the appropriate specifications to ensure safe access and egress for all users. The layout of the Site with clear signage and street markings allows for a safe and seamless flow of traffic.

Trees and Landscaping

- 6.23 Both the Wrexham UDP and the Draft Wrexham LDP outline policies for the protection and retention of trees, hedgerows and woodland. Wrexham UDP policy EC4 states:

“Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape. Development which results in the loss or significant damage to valuable trees, important hedgerows or ancient woodland sites will not be permitted.”

- 6.24 Draft Wrexham LDP policies SP20 and NE3 also have effect for protection of the natural environment. Policy SP20 states:

“Wrexham’s distinctive natural heritage provides a network of green and blue infrastructure. Protection, conservation and enhancement of natural heritage networks needs to be reconciled with the benefits of development. Development will be required to maintain or enhance the extent, quality and connectivity of the County Borough’s multi-functional green infrastructure network on or near a site, and, where appropriate to enhance it by:

- I. Creating new interconnected areas of green infrastructure between the proposed site and the existing network,*
- II. Filling gaps in the existing network to improve connectivity,*
- III. Protecting the features most valuable for both nature and people, and*
- IV. In instances where loss of green infrastructure is unavoidable, provide mitigation and compensation for the lost assets on a site specific basis.”*

- 6.25 Policy NE3 sets out further requirements for the protections of trees woodlands and hedgerows, and states that:

“Development will only be permitted where it does not cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value or those that provide important ecosystem services including mitigating the effects of climate change.

Development affecting all existing and new proposed woodlands should:

- I. Support proposals which assist in the respectful and appropriate use and protection of woodlands and boundary edges,*
- II. Promote sustainable management to deliver multiple benefits, and*
- III. Support the relevant aims and objectives of the Wrexham Tree & Woodland Strategy 2016-2026 and all subsequent amendments.*

Avoiding adverse or detrimental impact on trees, woodlands and hedgerows should be the primary objective of any proposal however, where adverse effects cannot justifiably be avoided and sustainable integration is not possible then adequate mitigation will be required. In such cases development should include proposals for the planting of new trees, woodlands, and hedgerows within the site, ensuring connectivity between proposed and existing green infrastructure.”

- 6.26 The Applicant has sought to retain as much vegetation on the Site as possible. Where this has not been possible, compensatory tree and hedgerow planting is proposed. Where trees are being lost as a result of development, Planning Guidance Note 17 (Trees and Development) provides guidance on the ratio of recommended compensatory replacement planting;

“Where development results in the loss of trees and hedgerows, new planting of at least equal number or canopy cover to those lost will usually be required to mitigate for the loss.”

- 6.27 The Proposed Development will involve replanting 19 trees to replace the 19 that are being lost as a result of the development. This compensatory tree replacement is in accordance with Planning Guidance Note 17.

- 6.28 Tree removals will be mitigated with a high-quality scheme of new tree planting and associated landscaping works as detailed in the proposed Landscaping Plans (Ref: 60695026-ACM-WRE-00-DR-LA-1001 and 60695026-ACM-WRE-00-DR-LA-1002). The planting proposals will represent an opportunity to enhance the quality, benefits and resilience of trees on Site.

- 6.29 Significantly more hedgerow is being proposed than what is being lost as part of the development. The hedgerows adjacent to the new parking area will be replaced with a similar native hedgerow, whilst to the south of the Site, a total hedgerow length of 76m will be planted to replace the 32m length lost to accommodate the charging infrastructure.

- 6.30 Wrexham's Planning Guidance Note 7 (Landscape and Development) sets out the considerations to ensure that the external environment and landscape are considered with development proposals.

“Certain plants will be more suited to the physical conditions of the site and to the local landscape character than others. As a general rule, locally native species are preferable for countryside boundaries and for large scale planting.”

- 6.31 The landscaping scheme has been carefully considered so that the Site integrates well with the natural and adjacent built environment. Natural species of hedgerow and trees have been selected for planting to respect the local natural character. As such, the proposal is considered to be in accordance with policies SP20 and NE3 of the Draft Wrexham LDP and the design principles set out in Planning Guidance Notes 7 (Landscape and Development) and 17 (Trees and Development).

Theme 3: Ecology and Biodiversity

Ecology and Biodiversity

- 6.32 At a national level, the PPW sets out the considerations when considering ecology and biodiversity as part of the development. PPW paragraph 6.4.21 states that:

“Planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible.”

- 6.33 At a local level, Wrexham UDP policy PS11 states:

“Encouragement will be given to proposals which improve the biodiversity value of sites and to the establishment of local nature reserves where the nature conservation and landscape interest of the land will be protected and enhanced.”

6.34 Draft Wrexham LDP policy SP15 sets out the following ecology and biodiversity considerations:

“Development will only be supported where it protects, conserves and enhances the natural environment including:

- Internationally protected Special Areas of Conservation, Special Protection Areas, and Ramsar Sites,*
- Nationally protected Sites of Special Scientific Interest and National Nature Reserves;*
- Protected Species and their habitat;*
- The Clwydian Range and Dee Valley Area of Outstanding Natural Beauty including recognising the importance it has in contributing to the Outstanding Universal Value and setting of the Pontcysyllte Aqueduct and Canal World Heritage Site;*
- Local Wildlife Sites including the strategic ecological network on Wrexham Industrial Estate and Regionally Important Geological Sites;*
- Local Nature Reserves;*
- Special Landscape Areas recognised for their outstanding local landscape character;*
- natural landscape features such as trees, hedges and woodland and the green networks between them which contribute to the quality and diversity of the natural environment and play an important role in mitigating the impact of climate change;*
- The quality of natural services including water, air and soils;*
- Developing and maintaining Green Infrastructure links; and*
- Habitats and species of principal importance to Wales.”*

6.35 A PEA report has been prepared by AECOM and submitted in support of this planning application to assess the ecological constraints in connection with the Proposed Development. The PEA confirms that the Proposed Development will not result in an adverse impact on locally, nationally, or internationally designated sites.

6.36 The PEA suggests that the Proposed Development is unlikely to have an adverse impact on ecology, however it makes recommendations in relation to reptiles, breeding birds, bats, badgers and other notable species. These recommendations will be incorporated into a CEMP to minimise any impact on ecology or the landscape. Furthermore, replacement landscaping around the Site is proposed to include suitable locally native species.

6.37 For the reasons set out above, the Proposed Development is considered to be in accordance with the objectives of the PPW, Policy PS11 of the Wrexham UDP and Policy SP15 of the Draft Wrexham LDP.

Theme 4: Flood Risk and Surface Water Drainage

6.38 The PPW considers on and off-site flood risk in the context of new development. PPW paragraph 6.6.18 states:

“The provision of SuDS must be considered as an integral part of the design of new development and considered at the earliest possible stage when formulating proposals for new development. In guiding new development the planning system should at the very least ensure the incorporation of measures at an individual site scale, particularly in urban areas, in order to secure cumulative benefits over a wider area.”

6.39 PPW paragraph 6.6.19 adds further that:

“Development proposals should incorporate design for surface water management, based on principles which work with nature to facilitate the natural functioning of the water cycle, providing issues such as land contamination would not result in the mobilisation of contaminants which may have an impact over a wider area.”

6.40 At a local level, Wrexham UDP policy EC12 states:

“Development (including the raising of land) within defined flood plains will only be permitted if it:-

- a) would not be subject to an unacceptable risk of flooding on-site; and/or*
- b) does not result in an unacceptable risk of flooding on or off-site; and/or*
- c) does not adversely affect flood management or maintenance schemes.”*

6.41 Wrexham UDP policy EC13 (Surface Water Run-off) adds further that:

“Development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted.”

6.42 Draft Wrexham LDP policy SP19 has effect for the prevention of climate change. The following section of the policy SP19 are pertinent to the consideration of managing flood risk:

“To mitigate against the effects of climate change and adapt to its impacts, development proposals will need to demonstrate that they have taken into account the following:

vi. Avoiding areas susceptible to flood risk in the first instance in accordance with the sequential approach set out in national guidance; and

vii. Preventing development that increases flood risk.”

6.43 According to Natural Resources Wales, the Site has been identified as being at a very low risk of fluvial flooding (land which has a chance of fluvial flooding of less than 0.1% each year) and at low risk to surface water flooding (land which has a chance of surface water flooding of between 0.1% and 1% each year).

6.44 A Drainage Strategy Report has been prepared and accompanies this planning application. The Statement details how surface water will be managed effectively and will not result in increased flood risk on or off the Site.

6.45 The proposed EV charging site will be drained in the same way as the existing car park; through gullies and existing infrastructure. Surface water on the new parking area to the west of the hotel discharged to ground via a permeable paving within the new parking bays and temporary sub-surface water storage.

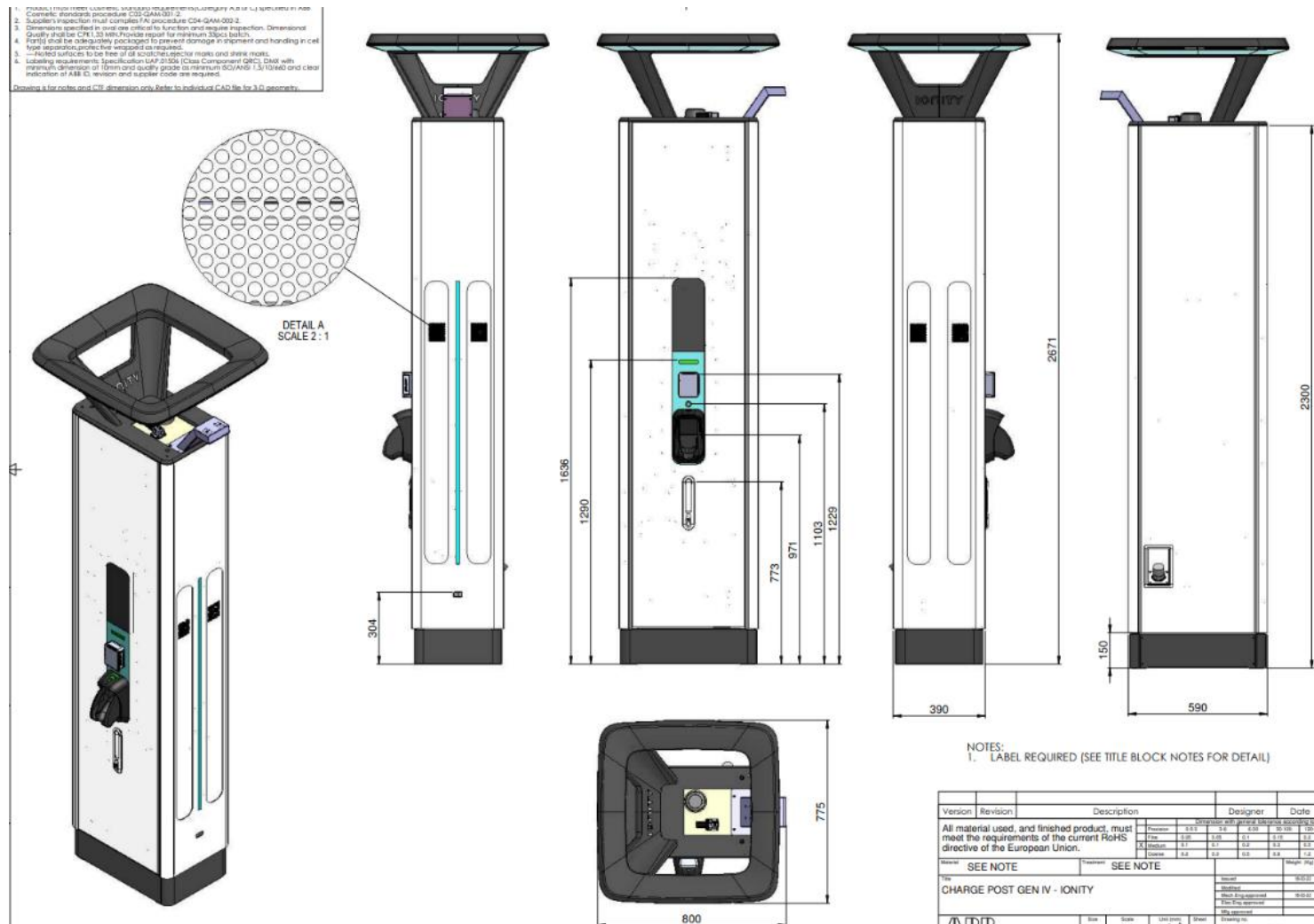
6.46 The sustainable drainage strategy is commensurate to the scale of the Proposed Development. Therefore, it is considered that the Proposed Development is in accordance the objectives of the PPW, policies Wrexham UDP policies EC13 and EC14 and Draft Wrexham LDP policy SP19.

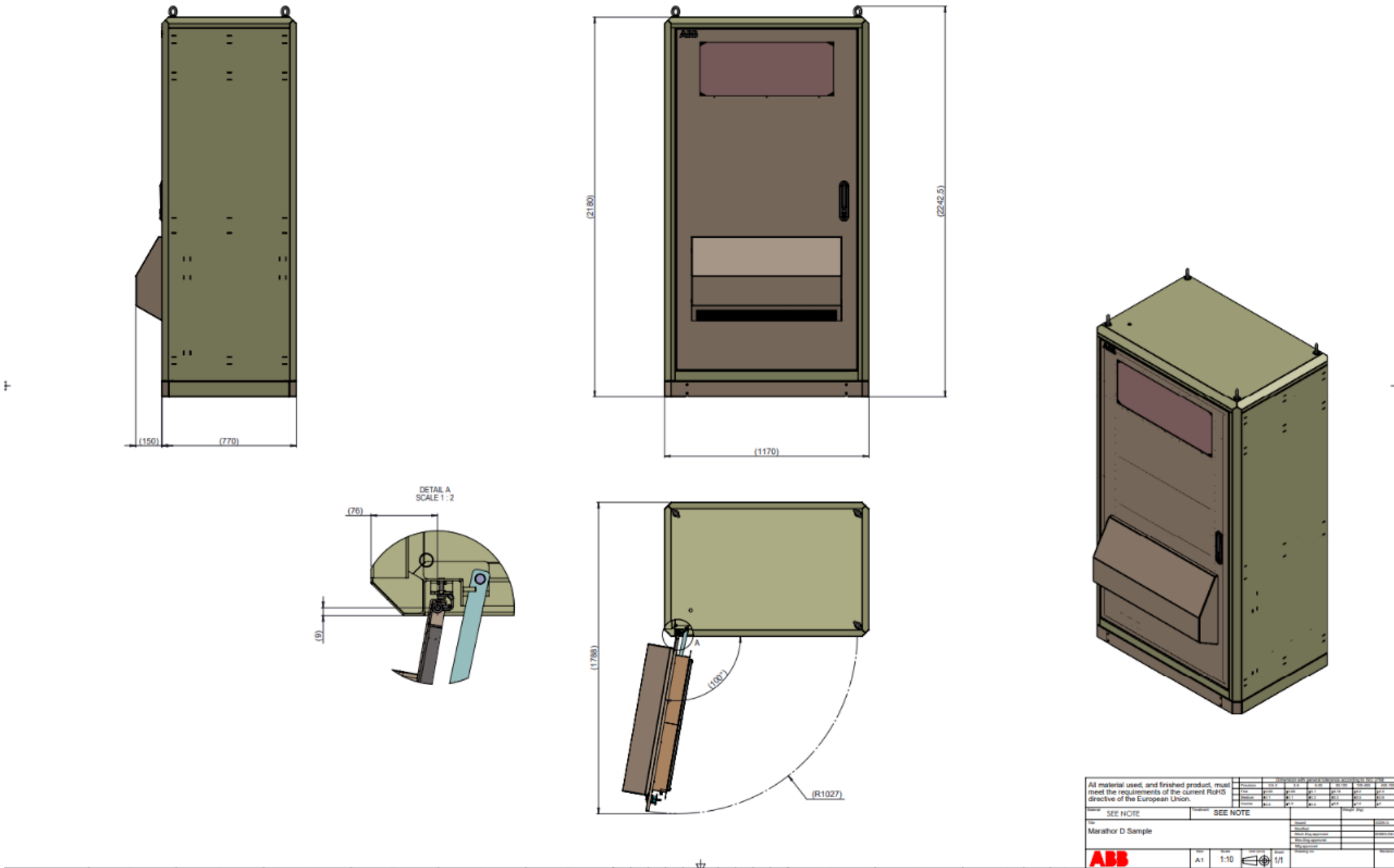
7. Summary and Conclusions

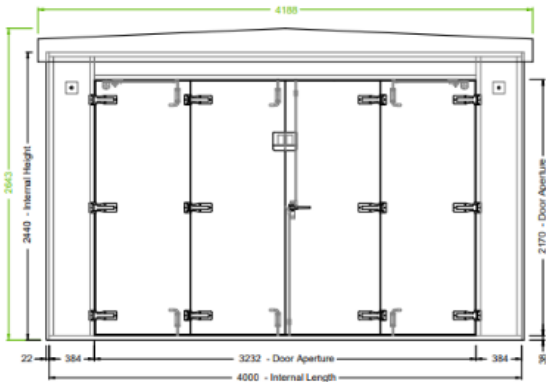
- 7.1 This PSS has been prepared by AECOM on behalf of IONITY GmbH in support of an application seeking full planning permission for the development of an IONITY EV charging site within the car park associated with the Ramada Plaza Hotel, Wrexham (grid reference 332219, 35073, SJ 32219 50731).
- 7.2 As summarised throughout this PSS, the Proposed Development aims to deliver a high-quality development that enable high-powered EV charging and carbon-neutral driving. The Proposed Development will offer multiple charging points and chargers with up to 350kW charging capacity for ultra-fast charging. This superfast charging capacity exceeds that on offer at all other charging sites across the UK and will almost double the number of public EV charging points in Wrexham¹¹. Furthermore, the Site will offer European charging standard Combined Charging System for the widest compatibility across EVs.
- 7.3 The installation of EV charging points will support local and national UK goals of sustainable development, servicing to promote uptake in EVs through provision of high-quality EV charging.
- 7.4 It is considered that the Proposed Development is in accordance with the relevant planning policy and that there are no significant adverse impacts associated with the development.
- 7.1 For the reasons set out throughout this PSS, it is considered that the Proposed Development in this location, is acceptable. Accordingly, planning permission should be granted.

¹¹ [Electric vehicle charging strategy for Wales: action plan \(gov.wales\)](#) Accessed 27/03/2023

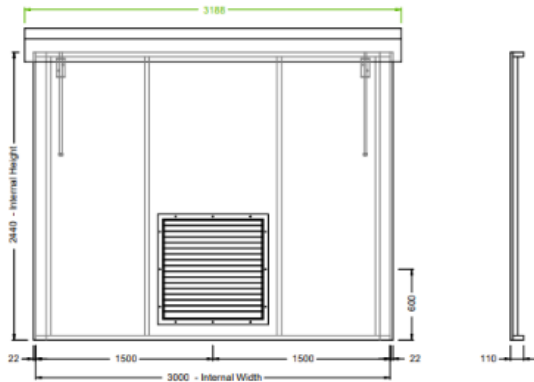
AECOM
1



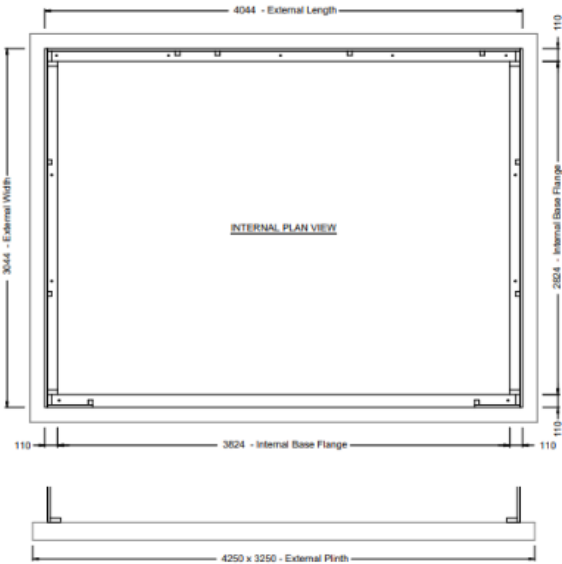




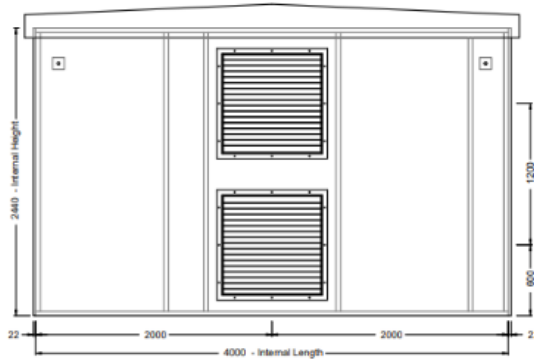
FRONT ELEVATION



RH AND LH SIDE ELEVATION



INTERNAL PLAN VIEW



REAR ELEVATION

Appendix B Site Photographs









[aecom.com](https://www.aecom.com)