

8 June 2023

Mr Gwyn Humphries
Planning Development Management
Wrexham County Borough Council
16 Lord Street
WREXHAM
LL11 1LG

By email only

Dear Gwyn,

**Proposed Electricity Substation at the “Kingmoor Site”, Land East of Bryn Lane, Wrexham Industrial Estate
FI Real Estate Management Ltd (“FIREM”)**

This letter accompanies a discreet planning application to install an electricity sub-station on the Kingmoor Site at Wrexham Industrial Estate. Details of the sub-station should be self-explanatory in the accompanying drawings and details, but if you consider more information is required, please let me know.

The application comprises:

- Application forms, certificates and planning fee paid £230
- Proposed Site Plan (red line plan)
- Proposed Substation Plan & Elevations
- Tree Constraints Report *
- Arboricultural Impact Assessment and Arboricultural Method Statement *

** both tree reports relate to the main application P/2023/0280 and are provided for context with only the relevant plans extract in appendices that relate to the location of the substation. A cover note is applied to both reports to assist consultees.*

FIREM seeks this standalone consent for the substation to facilitate the development of the allocated employment site (UDP) / employment land (LDP) and specifically the proposals recently submitted under P/2023/0280, which we refer to as the “Main Application.” The siting of the substation aligns with the proposed access position in the Main Application and existing constraints, including the 10m easement for the proposed swale to the west of the substation.

The reason to apply now is twofold. Firstly, FIREM is required to apply to energy providers – in this Scottish Power – to secure capacity on the network which will serve the proposed substation / development of Kingmoor. This has both a lead-in time to secure and a deadline within which to relevant secure planning consent. The Main Application will clearly take several months to determine and there is a risk that the secured capacity could be lost placing the development at risk. Secondly, this risk to the developer is of planning concern because it relates to the deliverability of the allocated employment site, i.e. to await the Main Application determination could lead to significant delay in successfully reapplying for capacity as Scottish Power is under no obligation to “hold” capacity

and if lost may lead to significantly higher cost to re-establish supply. This would materially affect the delivery of the allocation and potentially undermine the objective to deliver new employment opportunities within the adopted and emerging plans.

We see no risk to prematurity from the substation application as it is not material to the consideration of the layout, access or ground preparation works in the Main Application being applied for, and of course will be of benefit in delivering the allocation site for employment use.

The siting of the substation is in the location of some existing trees as evidence in the Tree Reports. It sits in the location of Group G10 and one specimen tree, T45 (see Tree Constraints Plan, Sheet 1 of 8 appended to the eponymous report). Tree T45 is a mature oak, in poor structural and physiological condition according to the assessment with an estimated 20-40 years of life; categorised as "B" which is moderate value. Group G10 is goat willow, up to 8m in height with estimate 220 stems, middle aged of good structure and fair physiological condition, with 10-20 years of life, categorised as "C" which is poor value.

Both tree T45 and Group 10 are proposed for removal to facilitate the site preparation of the employment land for development as set out in the Main Application.

The impact on the one individual tree and the group is considered very moderate in the context of the wide site allocation at Kingmoor. And, regardless of the outcome of the Main Application as a specific development proposal, it will be necessary to remove these trees to redevelop the allocation because of its position toward the Bryn Lane boundary and access road to south which must be developed to deliver the site. We therefore consider on the aspect of the trees the one individual tree and the group can be removed without predetermination of the Main Application.

If you consider any further information is necessary in connection with validation of the proposal or to consider the proposal, please contact me. Otherwise I hope to meet you soon in connection with this and other matters to discuss issues in more detail.

Yours sincerely,

A handwritten signature in black ink, appearing to read "R Purser", with a horizontal line drawn underneath the name.

Richard Purser, Director
Plan Red Ltd

M: 07938 063301

E: richard@planred.co.uk