



PLANNING STATEMENT

In support of a Full Planning Application for Development of Site for a Warehouse (Class B8 use) with ancillary offices, associated means of access, car parking, servicing and infrastructure, landscaping, ecological mitigation zone and ancillary works

On behalf of FI Real Estate Management Limited

Located at Site 5, Clywedog Road South, Wrexham Industrial Estate

JULY 2022

DOCUMENT REFERENCE: FI002/01 v3



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DATE	JULY 2022		
PROJECT REFERENCE	FI002		
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1 SUMMARY

- 1.1 This Planning Statement has been prepared on behalf of FI Real Estate Management Ltd (“FIREM”) in support of its proposed development of a large warehouse and distribution unit with ancillary offices at land known as Site 5, Clywedog Road South, Wrexham Industrial Estate.
- 1.2 FI Real Estate Management was established 40 years ago. It provides workspace, asset and property management services and is an experienced developer who is becoming an increasingly important and central activity to its business. Most of its employment related schemes once developed and completed are retained within its investment portfolio, which includes industrial, office, retail and residential premises. It has recently created its own construction arm, FI Construction, to develop out its own schemes. FIREM is one of the most active developers at Wrexham Industrial Estate, investing in refurbishment, replacement and new build commercial and industrial buildings.
- 1.3 The proposed development is described in submission as:
- Full Planning Application for Development of Site for a Warehouse (Class B8 use) with ancillary offices, associated means of access, car parking, servicing and infrastructure, landscaping, ecological mitigation zone and ancillary works*
- 1.4 The application site extends to approximately 3.01 ha (7.5 acres). The applicant controls a large area of other land roughly to the south and north east of the site along with other sites elsewhere in Wrexham Industrial Estate (‘WIE’). It is currently undeveloped but is previously developed land and is located within an area that is mainly developed out for employment units/uses.
- 1.5 Permission is sought for a 14,147 sqm (152,287 sq ft) warehouse including ancillary office space arranged to the southern area of the building. It is a contemporary design, orientated north to south of a scale and configuration designed to meet warehouse and distribution requirements for high-bay stacking that is required in the market. Operationally the building fronts Clywedog Road South on its western elevation with service yard, loading bays and parking areas all to west with some parking wrapping to the southern elevation where the site tapers.



- 1.6 Access will be taken from two points off Clywedog Road South, the southern access will serve the car park for staff and visitors, the northern access will serve the service yard which has 14 HGV loading bays.
- 1.7 In planning policy terms, by reference to Planning Policy Wales (11th Edition, 2021), the adopted Wrexham UDP and emerging Wrexham LDP, the site can be regarded as suitable for the proposed development as it is located within the defined area of Wrexham Industrial Estate and allocated for employment development.
- 1.8 The site benefits from an extant planning permission for employment development for a mixed B1/B2/B8 use in two buildings granted to FIREM in December 2020 (P/2018/1087). Combined floorspace in the approved development is around 2/3s of this proposal configured over two buildings in a range of units, whereas this is for a single, larger scale unit.
- 1.9 The proposed development can be regarded as acceptable by reference to usual planning, site related and land use considerations, including its impacts and effects on the local road network (transportation considerations), biodiversity and ecology, amenity of existing uses including residential (air quality and noise), ground conditions, flood risk and drainage and by reference to related planning policies of the adopted and emerging development plans.
- 1.10 Scale and height of the building has been assessed within the site context and existing landscape, in particular its relationship to the east with homes at Pentre Maelor. The significant degree of separation between the closest house and proposed building, intervening tree line and restriction of available views this creates means the scale and height will not lead to diminished residential amenity or loss of outlook.
- 1.11 Overall, the planning application for the proposed development can be regarded as acceptable in planning terms including by reference to usual planning policy and general planning and land use considerations. It will also deliver a considerable range of economic benefits to be given due weight in the consideration of the planning application.
- 1.12 Accordingly, the planning application can and should be granted.

2 BACKGROUND

About the applicant

- 2.1 FIREM was established 40 years ago. It provides workspace, asset and property management services and is an experienced developer with this is becoming an increasingly important activity. Most of its employment related schemes once developed and completed are added to its diverse investment portfolio, which includes industrial, office, retail and residential premises. It has recently created its own construction arm, FI Construction, to develop out its schemes.
- 2.2 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 through an approach defined by a commitment to excellence.
- 2.3 Its team specialises in large-scale single use or mixed-use developments, using their planning experience to bring together a strong supply chain of consultants and contractors to deliver projects of every type and size.
- 2.4 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.
- 2.5 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.

Reasons for the current proposal

- 2.6 Taking a step back a key objective of the current and emerging development plan for the site, the *Wrexham Local Development Plan* ("WLDP"), is to support a vibrant, diverse and competitive local economy and one that provides a range of job opportunities to enable new and existing businesses to grow and develop in Wrexham. Accordingly, it is imperative that the council and owners and suppliers of industrial and employment land and premises for leasing, including FIREM, provide the Borough with an adequate supply of high quality serviced land and premises to accommodate projected growth and

demand from would be tenants, while allowing choice and flexibility to meet the varying nature of future employment needs and demands.

- 2.7 This policy imperative is supported through the Council's Economic Prosperity Strategy (2012-2017), prepared in support of the emerging WLDP, that emphasises and recognises the need for the council and related partners, which we would say includes the likes of FIREM, to intervene to guide the direction and development of the local economy. The Strategy also confirms the council's commitment to securing an adequate supply, and in the correct locations, of the right land and buildings to attract high quality employment uses and opportunities and in the most sustainable and accessible locations. The Strategy does acknowledge that it will not just be the Council that will provide the right land and buildings etc. hence the relevance of this to organisations like FIREM that specialise in providing high quality employment units / floorspace for leasing.
- 2.8 Accordingly, developments like that proposed for the site by FIREM are needed for many reasons, including need to accommodate the jobs growth estimate; need for flexibility in provision of employment floorspace; need for competition to drive quality and choice; and need for a range of available sites and premises suitable for different employment uses and businesses in varying locations throughout the Borough. Ideally, developments of this ilk should be located in sustainable locations like Wrexham Industrial Estate ("WIE").
- 2.9 A point acknowledged in the Strategy and experienced by FIREM is that there is a recognised and continued strong demand for land and premises in the area including at WIE – approximately 80% of the employment land take up in the Borough since 2006 has been on land within WIE. Existing and emerging planning policy in Wrexham UDP and LDP respectively, including WLDP Policy EMP1, support the protection and making best use of land already allocated for and in use for employment purposes.
- 2.10 As traditional employment uses tend to generate lower land values than most other uses, for e.g., housing and retail (certainly in recent past), there can be pressure for employment land to be lost to these uses, which can be difficult to replace. While some existing sites which may not have a reasonable prospect of being used for economic development can be de-allocated, planning policy seeks to safeguard existing and identified future employment sites for employment use. FIREM is conscious of this point, and this is one of the drivers for it wanting to develop a new employment unit at the site.

3 APPLICATION SITE

Location

- 3.1 The planning application site is known to the applicant as Site 5, Clywedog Road South, Wrexham Industrial estate. Its address is land to the east of Clywedog Road South, Wrexham Industrial Estate, Wrexham, LL13 9UG.
- 3.2 The broad location of the site is shown on the plan at Figure 1 and the extent of the site, i.e., red and blue line boundary, is as shown on the plan at Figure 2 which follow:

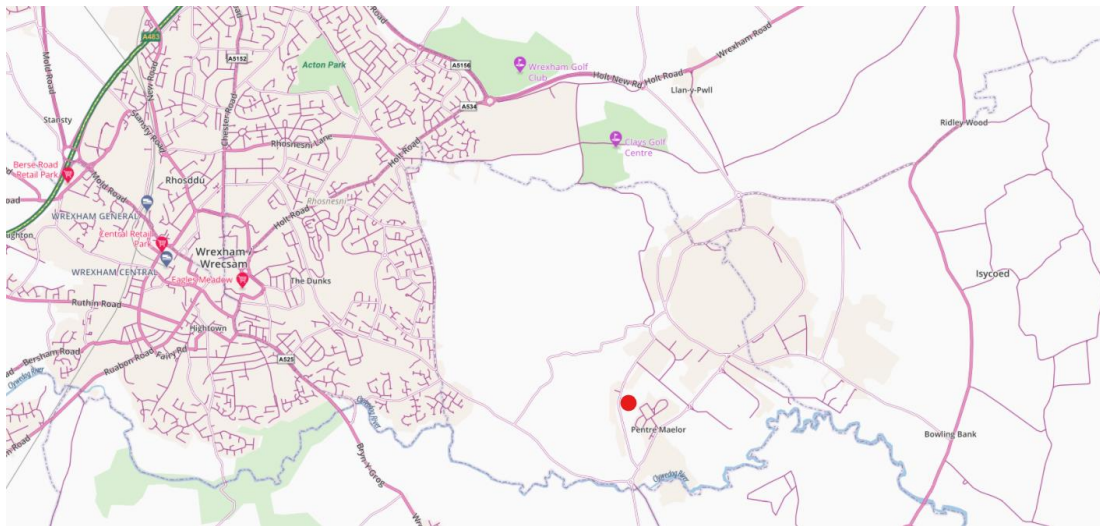


Figure 1: Location of WIE and the of the application site within it

Site

- 3.3 The application site extends to approximately 3.01 ha (7.5 acres). As can be seen from the plan at Figure 2 the applicant controls a large are of other land roughly to the south and north east of the site; along with other sites elsewhere in WIE. It is currently undeveloped but located within an area that is mainly developed out for employment.
- 3.4 The site is flat and featureless and currently grassland which is regularly maintained by FIREM for estate management purposes.

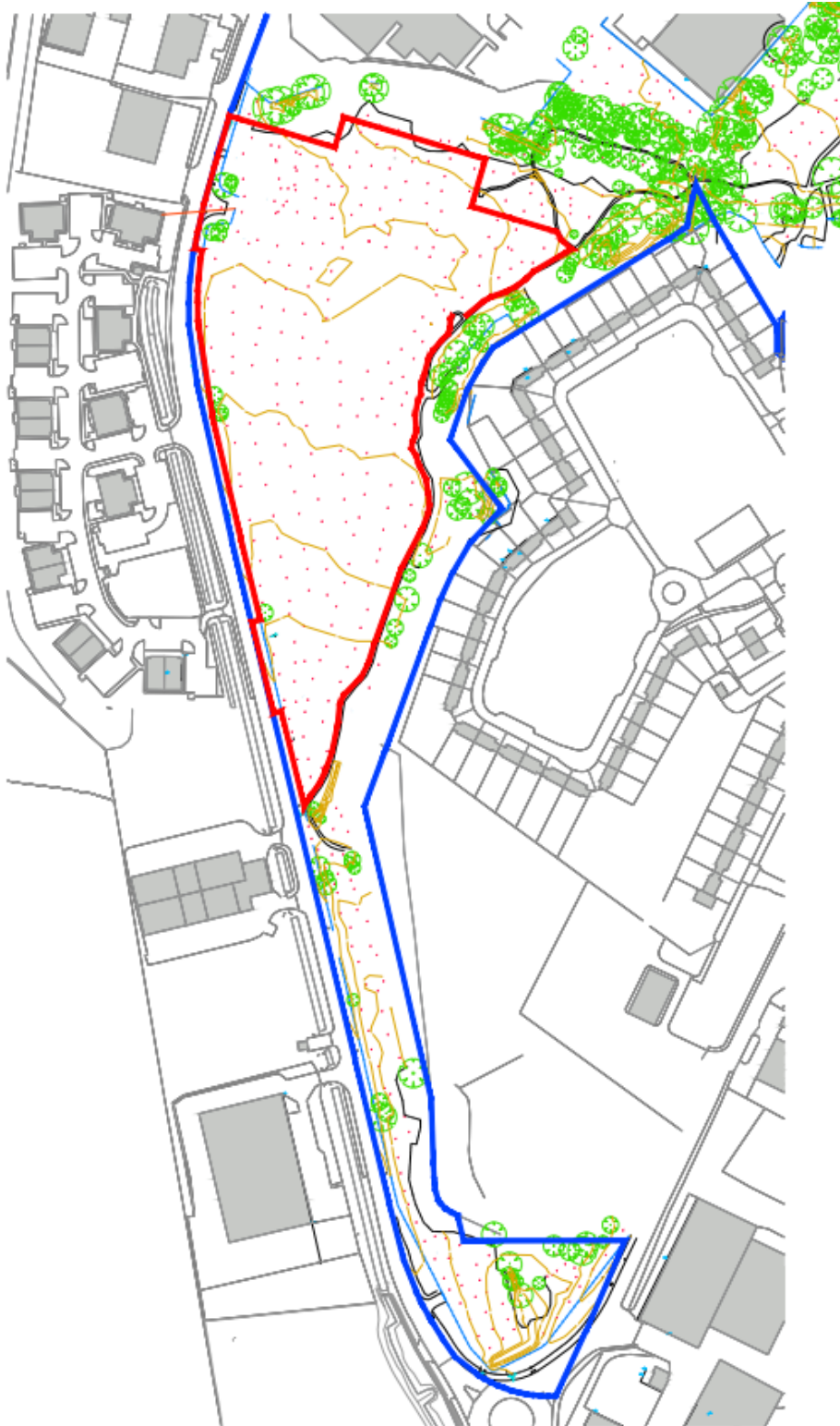


Figure 2: Site Location Plan

- 3.5 The photographs that follow (© Google Street Views) illustrate the site in its current form:



Photograph 1: Existing vehicular access into the site off Clywedog Road South looking south



Photograph 2: Site from Clywedog Road South looking north east



Photograph 3: View from Clywedog Road South looking northwards across site

Site history

- 3.6 The site is currently undeveloped but is previously developed land by reason of its historic use as part of the former munitions factory during WW2, Royal Ordnance Factory

Wrexham, which produced cordite, an explosive propellant for shells. The site employed around 13,000 workers at its height and was one of the largest such munition complexes during the war¹. Figure 3 below marks the approximate location of Site 5 within the former complex.

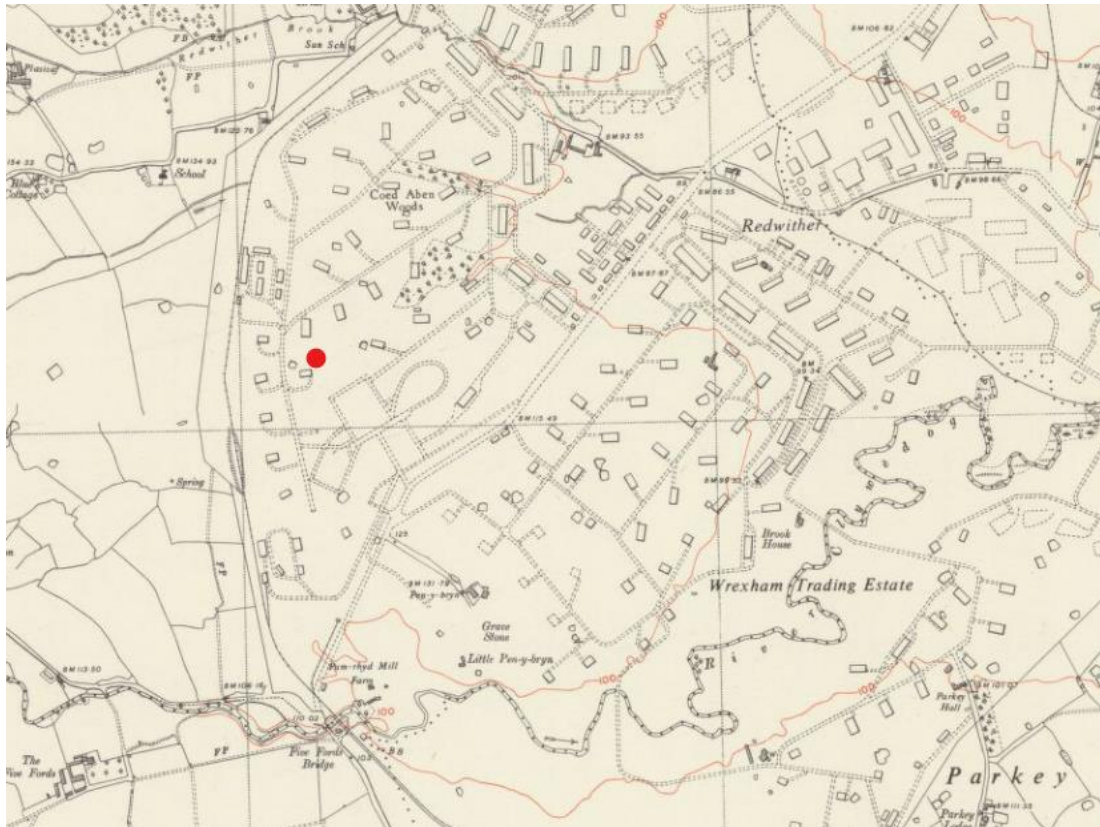


Figure 3: Historic 1:25,000 OS Map (1949) showing extent of munitions factory which in time became WIE. The red dot identifies the general location of the application site

- 3.7 Following the war the estate was transformed from a military site to a peacetime facility for industrial and employment uses. At that point in time businesses initially used the site's stock of existing buildings. But soon after, and continuing ever since, many existing buildings were redeveloped so as to facilitate the delivery of more modern and fit for purpose industrial and commercial floorspace.

¹ Source: https://en.wikipedia.org/wiki/Wrexham_Industrial_Estate

- 3.8 WIE has now grown to cover approximately 550 hectares (1,359 acres) and is the largest industrial estate in Wales, second in the UK after Trafford Park, and one of the largest industrial estates in Europe. It supports around 300 businesses, providing employment for approximately 8,000 people. The estate consists of standalone industrial sites, industrial estates and business parks.
- 3.9 In addition, the estate is the location of the UK's largest prison, HM Prison Berwyn. This opened in 2017 and is directly to the south east of the site.

Surroundings

- 3.10 The site is directly opposite a number of existing employment units, mainly in use for offices, and related employment operations, on the west side of Clywedog Road South.
- 3.11 To the east of the site, well hidden from view by a tree and natural landscape screen, is a small estate housing area Pentre Maelor accessed off Bridge Road South further east, which meets Clywedog Road South to the south of the site. The homes were built to serve the site's historic use as a munitions complex. This area of housing has no functional relationship to the site.

Topography

- 3.12 The site is flat and sits at 38m AOD.

Drainage and flood risk

- 3.13 Reference to the Natural Resources Wales Flood Risk Map confirms that the site in its entirety is located in Flood Zone 1. This zoning means that the site can be regarded as being at low risk of flooding and suitable for development.

Access

- 3.14 In terms of its accessibility profile, the site is well-located vis a vis its relationship to the road network and public transport services that serve the industrial. Further details are covered in the Transport Report by Prime.

Planning history

- 3.15 Outline planning permission P/2018/1087 was granted permission in December 2020 to FIREM for development of the site for Use Class B1 light industrial unit and B2 / B8 industrial unit including means of access, scale of building and ecological mitigation zone

NOTES

- All dimensions and levels are to be checked on site.
- Any discrepancies are to be reported to the architect before any work commences.
- The drawing shall not be used to ascertain any dimensions, area or spatial dimensions only.
- This drawing shall not be reproduced without express written permission from SRS.
- The survey, drawings and ownership boundaries are those shown on the title plan and are not to be used as a basis for any claim or dispute.
- All works are to be undertaken in accordance with Building Regulations and the relevant standards.
- All proprietary materials and products are to be used in accordance with the manufacturer's recommendations.

CDM 2015

Classification of client: **RESIDENTIAL**
Principal Designer: **SRS**

Other noted below: All relevant parties have been notified on the drawing.

Scale: 1:1250 @ A2

SCHEDULE OF ACCOMMODATION

Unit Name	Ground Floor GIA	First Floor (Offices) GIA	Overall GIA
Unit 1	65,000 IP / 6,028m ²	5,000 IP / 464m ²	70,000 IP / 6,502m ²
Unit 2A	2,390 IP / 222m ²	N/A	2,390 IP / 222m ²
Unit 2B	11,291 IP / 1049m ²	N/A	11,291 IP / 1049m ²
Unit 2C	4,872 IP / 434m ²	N/A	4,872 IP / 434m ²
Unit 2D	4,747 IP / 441m ²	N/A	4,747 IP / 441m ²
Unit 2E	2,390 IP / 222m ²	N/A	2,390 IP / 222m ²
Total Development			95,490 IP / 8,871m²

Legend:

- Landscape buffer offset
- Areas of existing vegetation and woodlands to be retained and areas of proposed soft landscaping
- Red line site boundary = 7.45 acres / 3.01 ha

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4 DEVELOPMENT PROPOSAL

- 4.1 Full details are provided in the accompanying drawings and Design & Access Statement prepared by scheme architect MCAU.

Layout / floorspace

- 4.2 The proposed development comprises a contemporary design single employment unit orientated north to south. It will be rectangular in shape with an attached office pod that will be located onto its southern elevation facing south and west.
- 4.3 The floorspace extends to 14,147 sqm (152,287 sq ft) – combined warehouse and ancillary offices. It is arranged as the main warehouse unit with a two storey office pod to the south of the main warehouse. Office space is in ancillary use.
- 4.4 The warehouse height to ridge line is 15.80m with parapet set at 14.00m. This balances the requirement to provide high bay racking storage internally whilst using the lowest practical roof pitch to minimise building height. The office area to south is lower at parapet 11.15m high with the roof set behind.

Use

- 4.5 The unit will be in Use Class B8 warehouse and distribution, office accommodation is ancillary.

Access, car and cycle parking and servicing

- 4.6 Service yard is situated to the west of the warehouse building providing 14 HGV loading bays utilising the existing vehicular access off Clywedog Road South, revised to accommodate the relevant vehicle movements / swept paths. See the Transport Assessment for further detail.
- 4.7 A second access is providing to the southern end of the site to serve the car park that wraps to the front (east) and side (south) of the office area. Parking for 140 vehicles is proposed including 14 accessible spaces and 7 EV charging spaces.
- 4.8 Cycle store for 16 bicycles is provided adjacent to the offices.
- 4.9 Figure 5 provides an extract of the site layout to illustrate.

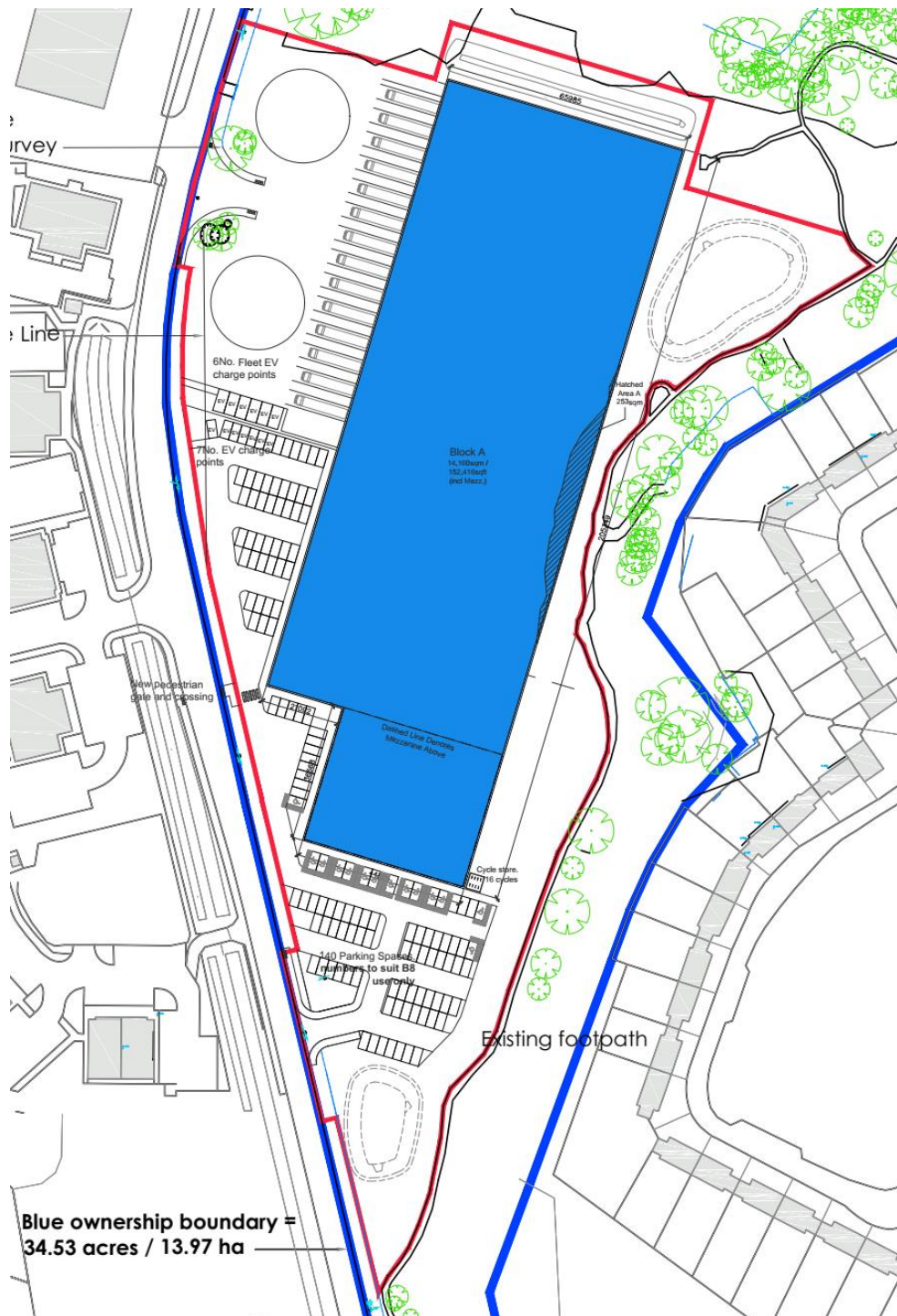


Figure 5: Extract Proposed Site Plan 1200-02-001

Design and materiality

- 4.10 A contemporary design and profile is proposed delivering a functional building and site that is clear in its use and arrangement. Elevations details are set out in the accompanying drawing pack, with extract reproduced as Figure 6.
- 4.11 The material palette complements the industrial context of the site and several newer units constructed by FIREM within the estate at other locations. A consistent colour palette and branding, absent future occupier advertisements, helps to maintain the profile of Wrexham Industrial Estate as a place for inward investment and quality destination. Figure 7 provides extract of details provided in the Design & Access Statement.

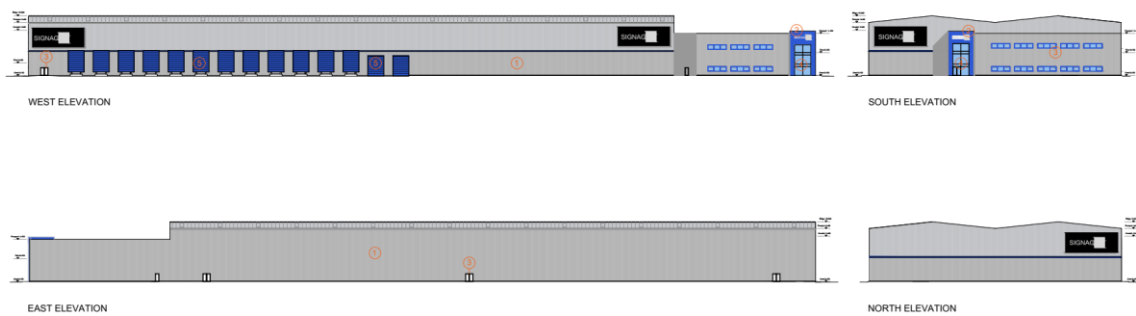


Figure 6: Extract elevations 1200-05-001

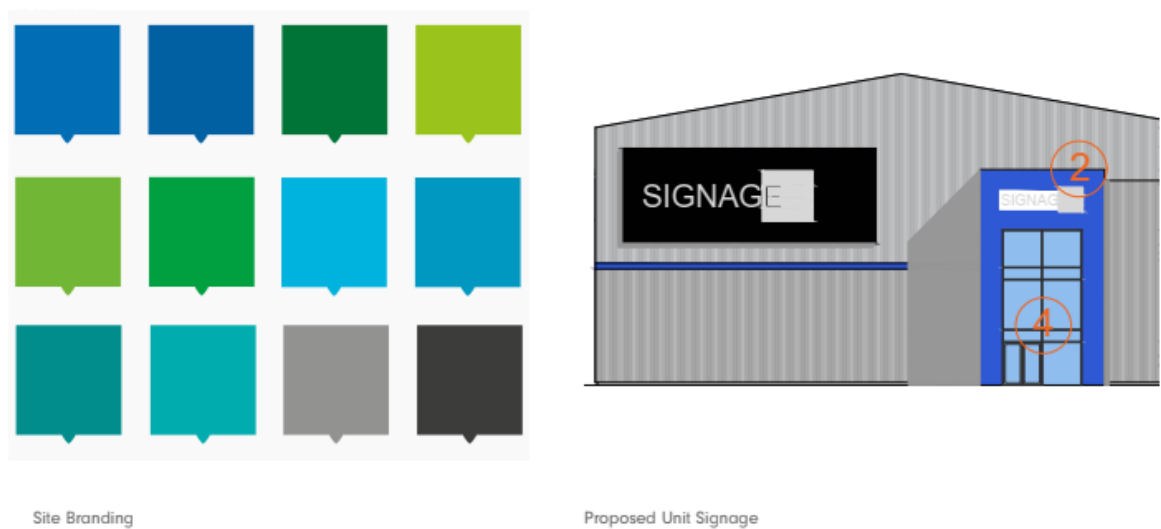


Figure 7: Extract branding colour palette for Wrexham Industrial Estate, Design & Access Statement

5 PLANNING FRAMEWORK

Background

- 5.1 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.
- 5.2 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.
- 5.3 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.
- 5.4 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

- 5.5 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

- 5.6 *Planning Policy Wales*, 11th Edition published in February 2021, (“PPW1111”), 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.
- 5.7 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.

- 5.8 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. This is not a new concept for the planning system as the principles of sustainable development have been at the heart of planning policy since PPW11 was first published in 2002. However, the concept has been expanded under the *Well-being Act* and it requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural.
- 5.9 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 can be done through maximising their contribution to the achievement of the seven well-being goals and by using the five Ways of Working, as required by the *Well-being Act*. 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.
- 5.10 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. Communities, national and local government, businesses, and the third sector must work together to take a long term view, integrating and aligning priorities through greater collaboration to achieve sustainable economic benefits for all in line with the well-being goals.
- 5.11 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.

- 5.12 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 (TANs)

- 5.13 PPW11 is complemented by more detailed national guidance set out in topic based Technical Advice Notes. The following are considered relevant and it is noted many requirements are reflected in both adopted and emerging local plan policies.

TAN 11: Noise (31 October 1997)

- 5.14 TAN11 directs local planning authorities to ensure that any noise generating development does not cause an unacceptable degree of disturbance and provide for relevant mitigation. It directs also to consider future changes and/or intensification of use in determining proposals and imposition of relevant conditions to control such matters.

TAN 12: Design (31 March 2016)

- 5.15 TAN12 iterates the strong commitment of the Welsh Government 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 – from householder extensions to new mixed use communities. The guidance should be cross-referenced with PPW11 definition of good design and its objectives.

TAN 15: Development and Flood Risk (30 July 2004)

- 5.16 TAN15 provides technical guidance which supplements the policy set out in PPW11 in relation to development and flooding. It advises on development and flood risk as this relates to sustainability principles (section 2.2 PPW11) and provides a framework within which risks arising from both river and coastal flooding, and from additional run-off from development in any location can be assessed.

TAN 18: Transport (31 March 2007)

- 5.17 TAN18 notes that an efficient and sustainable transport system is a requirement for a modern, prosperous and inclusive society. However, transport, in particular road traffic, can also have negative impacts on human health and the environment. Road traffic growth is a cause of increased local air pollution, greenhouse gas emissions contributing to global warming and climate change and, in some areas, congestion, which can affect economic competitiveness.
- 5.18 On other 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 such developments, which offer genuine and easy access by a range of transport. It promotes development to locations that are highly accessible by a variety of travel modes.

TAN 23: Economic Development (28 February 2014)

- 5.19 TAN23 supports PPW1 and objective 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. On existing employment sites, the TAN confirms that certain industrial and related uses may conflict with other uses, especially housing. To operate effectively, these activities usually need dedicated industrial areas, where they can be confident that they will not be a bad neighbour to anyone. In managing the retention and release of existing employment sites authorities should aim to ensure that the integrity of remaining employment sites is not compromised.

Development Plan

Wrexham Unitary Development Plan 1996-2011 (2005)

- 5.20 The adopted Unitary Development Plan (“WUDP”) by rights should have been replaced by now by the emerging Local Development Plan, The reason for delay is returned to below. Nonetheless at time of submission it is the adopted plan and the following policies are identified as relevant to the proposal:
- PS1 settlement limits
 - PS2 impact on landscape character and environment

- PS3 make use of brownfield land
- PS4 maintain existing settlement patterns, character and transport network integration
- GDP1 development objectives, including:
 - Scale, design, layout, materials and landscaping
 - Energy efficiency in design
 - Accessibility by modes of transport
 - Safeguard from emissions, pollution, flood risk, drainage, etc.
 - Ecology and nature conservation
 - Secure sustainable communities
- EC4 Hedgerows, woodlands and trees
- EC13 Surface water run-off
- EC17 Pentre Maelor buffer zone
- E1 Employment allocations – specifically E1.12 Clywedog Road South (iii)
- E8 Pentre Maelor – safeguard allocation for ‘Business Use’
- T8 Parking standards

5.21 The above list of policies was identified in the Officer’s Report as those relevant to application P/2018/1087 with our addition of Policy E1. Figure 8 provides relevant extract from the Proposals Map illustrating allocation E1.12, which is a larger allocation than the site.

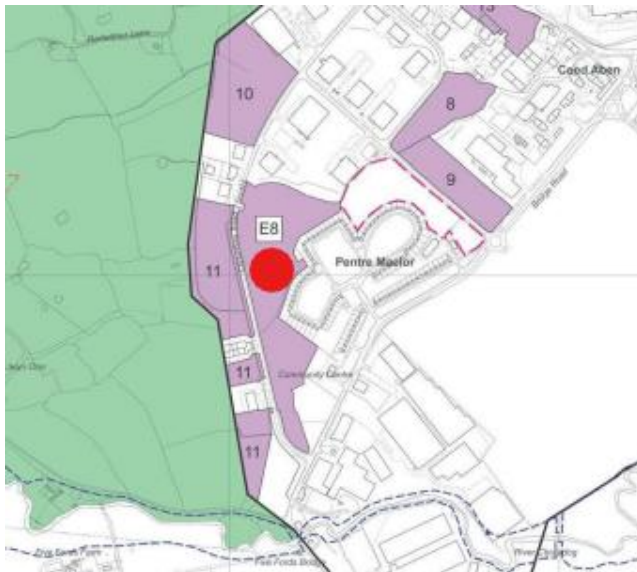


Figure 8: Extract from Proposals Map of Wrexham UDP(site's location identified by red dot)

Wrexham Local Development Plan

- 5.22 The Council is still preparing its new plan, the Wrexham Local Development Plan (“WLDP”) to replace the WUDP. Despite having completed its examination stage the Plan remains in hiatus for adoption because of an issue arising over phosphates under direction of the Welsh Government. Until there is guidance on how new development is expected to accommodate foul effluent and drainage to the public sewer system – or alternative means – as a general approach, the plan remains in abeyance for adoption. It is hoped adoption may now come in mid/late 2022.
- 5.23 The plan can be considered a material consideration to which a degree of weight can be given, with some policies where there is an agreed outcome from the examination attracting the greatest weight.
- 5.24 The following policies are considered relevant to the proposals:
- SP2 Location of new development
 - SP3 Key Strategic Sites – specific Wrexham Industrial Estate
 - SP6 Planning obligations
 - SP9 Economic growth employment and enterprise
 - SP10 Wrexham Industrial Estate
 - SP12 Transport and accessibility

- SP13 Design principles
- SP14 Health and wellbeing
- SP15 Natural environment
- SP19 Climate change
- DM1 Development management considerations
- NE3 Trees woodlands and hedgerows
- BE6 Waste water treatment and river water quality
- EM6 Pentre Maelor and KSS3 Housing Buffer Zones
- T1 Managing transport impacts
- RE1 Development and renewable energy

5.25 The WLDP confirms that the site is within the defined area of Policy SP10: Wrexham Industrial Estate and impacted by Policy EM6: Pentre Maelor, as illustrated in Figure 9.

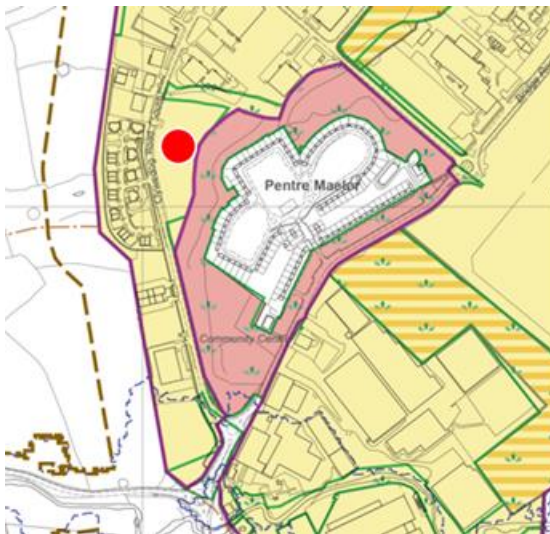


Figure 9: Extract Proposals Map of draft Wrexham LDP (site's location marked by red dot)

5.26 Policy SP10 confirms that Wrexham Industrial Estate, as shown on the proposals map, will be the primary focus for new employment development in the Borough over the plan period for Use Class B employment and other ancillary related development. Land is also protected on the estate for a strategic ecological network for a number of protected species and habitat.



- 5.27 Consideration of policy suggests that new Use Class B employment development, which is of a good quality and suitable for the site it is proposed to be developed at, subject to including appropriate ecological mitigation proposals given national and internationally protected species that are present at the Industrial estate, can be regarded as acceptable in principle.
- 5.28 Policy SP10 and Policy EM6 identify what is termed a residential buffer to the Pentre Maelor housing estate to the east of the development.

6 PLANNING ASSESSMENT

Approach

- 6.1 This section of the statement sets out whether the proposed development accords with the provisions of the local development plan, this by reference to the planning decision making framework applying in Wales as set out in Section 6 of the statement. In so doing it also considers whether the planning application can be regarded as acceptable by reference to relevant material considerations and usual planning and land use considerations.
- 6.2 Our assessment and case in support of the planning application is presented by identified key topic areas leading to our conclusion that the planning application accords with relevant development plan policy, and other policies and guidance, and therefore a recommendation to grant planning permission.

Principle of Development

- 6.3 The application site is within the defined settlement limit of Wrexham Industrial Estate, (“WIE”). The proposed Class B8 warehouse use with ancillary office use accords with adopted UDP Policies PS2 and E1 for commercial development in such locations and must be considered acceptable in principle.
- 6.4 UDP Policy E8 allocates the land to be safeguarded for ‘business use’ on the basis of a reasoned justification to protect the residential amenities of the Pentre Maelor housing estate further to the east. Business use is interpreted to mean Class B1 use for office, light industry or research & development as this can generally be undertaken adjacent to residential uses without detrimental to amenity. In this the proposed Class B8 use does not accord to the policy.
- 6.5 However, it is a material consideration that the site benefits from outline planning permission for B1, B2 or B8 use under extant permission P/2018/1087. This permission has conditions attached including provision of a buffer between the proposed buildings and eastern site boundary, but as a matter of principle it demonstrates Class B2 and B8 use can be developed at the site without breaching the objective to protect residential amenities of homes at Pentre Maelor consistent with Policy E8.

- 6.6 Emerging LDP Policies SP9 and SP10 allocates the WIE as the county's 'Key Business Sector Area' for the focus of new employment development over the plan period for Class B uses and ancillary development. Though it is an emerging policy the plan is at an advanced stage and can be given weight as a material consideration. Emerging Policy EM6 seeks to introduce a 50m landscape buffer between the existing housing at Pentre Maelor and any potential development in any direction which has relevance to the application site.
- 6.7 The effect of emerging Policy EM6 is to change the emphasis in policy of potential use of Site 5 to any Class B use, i.e. Classes B2 or B8 in addition to B1, on the basis the landscape buffer is maintained.
- 6.8 Emerging Policy EM6 underlined the decision making process to permission P/2018/1087 taken in December 2020. No material change to the emerging policy or site conditions has occurred since this decision and *ceteris paribus* this proposed development for B8 Use with ancillary offices can be supported under adopted and emerging policies in principle.
- 6.9 Contextually the Officer's Report from December 2020 on the extant permission reached this policy support in principle support through setting out the high occupancy rate of premises in Wrexham Industrial Estate ('WIE'); the applicant's ('FIREM') evidence of full occupancy of its building portfolio in the estate; and its lack of ability to offer existing and prospective tenants' suitable accommodation. It also set out that the WBC Employment Land Review (2018) found a low vacancy rate of 4% within WIE compared to a figure of 7-10% considered reasonable for offering choice on premises, locations, sizes and tenure to meet need within the market. The latest 2019 Review does not replicate comparable figures, but it is FIREM's experience the market supply remains tight and vacancy rates low in its portfolio and knowledge of the market from tenant enquiries.
- 6.10 The accompanying Employment Land Statement confirms that demand remains for additional employment premises at WIE, and there is a need to diversify from historic heavy industrial and manufacturing, with greater demand in the market for warehouse and distribution units. This needs to be met with modern premises, fit for purpose, with clear floorspace with high bay clearance for racking systems, dedicated yard and HGV access and integrated offices and operable 24-hours. WIE and Site 5 is a suitable site to deliver such a unit. Conversely there is a more limited demand for B1 office uses within WIE where there is a regular turnover and vacancy for a range of units, a point also acknowledged in the Officer's Report in 2020. As example Wilkinson Business Park has 5

units between 625 and 5,500 sq ft advertised as available by agent Legat Owen at time of submission².

- 6.11 The point still remains in mid-2022 as in late-2020 that there is a critical shortage of modern, suitable and available accommodation to meet demand in a key, growing sector for warehouse and distribution at WIE. Weight should be given as an important material consideration to the evidential demand for employment land and suitable premises now as it was in 2020. For this reason and given the weight to give to emerging policy too, the focus of adopted Policy E8 to use the site for only ‘business uses’ should be given diminished weight to the broader support to all Class B uses in emerging Policy EM6.
- 6.12 Aligned to this, and though not a land-use planning concern, it is a material consideration that the proposal will bring significant socio-economic benefits, i.e. construction and operational stage employment opportunities. FIREM as applicant, developer and future proprietor of the unit will also have at its disposal more flexibility to offer new and existing tenants’ premises to meet needs, i.e. the unit may attract a new business to WIE or may allow relocation of an existing tenant releasing its existing premises back into the market. And though the private business interests of FIREM are not of direct planning concern, the overall functioning of the market and provision of employment at WIE is a central policy concern to adopted UDP Policies PS2 and E1 and emerging LDP Policies SP9 and SP10 and can be given weight.
- 6.13 Thus the crux of this application proposal then moves from the clear “in principle” support to the proposed use to the physical impact of the development on the site, surroundings and of key importance, ecological impact and impact on residential amenity. All these points are important material considerations in support of the application in principle which we turn to below, followed by other material considerations including drainage / phosphates, ground conditions and alike.

Amenity

- 6.14 It is acknowledged that industrial uses have the potential to generate noise and activity, visits from the public and vehicular movements throughout the day. Two key facets in the design minimise this impact – restriction to B8 warehouse and distribution use and

² Source: <https://www.legatowen.co.uk/property/wilkinson-business-park-clywedog-road-south-wrexham-industrial-estate-wrexham/> accessed 13/7/22

orientation of buildings to place active frontage and external areas to the western side of the site.

Use, building orientation, activity and noise

- 6.15 The use of the unit at consultation stage was left open for a range of Class B uses, but now on application it is narrowed to Class B8 warehouse and distribution use with ancillary offices. The effect is to remove the potential for activities and manufacturing operations within Classes B1 and B8 being operated from the site which could give rise to nuisance through noise, odour, vibration and other emissions to the nearest residential receptors, i.e. Pentre Maelor residents to the east.
- 6.16 Unit orientation is north-south with the active frontage for HGV bays, yard and service area all to the western elevation. Offices to the south have car parking to west and south. No activity is presented to the north and east elevation with only emergency access doors. As will turn to in matters of ecology this layout has other benefits too, but for amenity the purpose is to ensure there is no direct emission, principally of noise from operation of the warehouse and yard to the east, and the building itself performs a substantial acoustic barrier. Conclusion of the Noise Assessment Report, prepared by Wardell Armstrong, confirms the development will have a low noise impact and;

‘The predicted noise levels generated, by the proposed development do not exceed the existing background sound levels at the identified noise sensitive receptors. ... Noise therefore, is not a material consideration when determining the planning application for the proposed development.’

- 6.17 As set out later it is also found in the Air Quality Assessment that there is a low impact on receptors, including existing residents at Pentre Maelor, in construction and operational stages from the proposed development.

Visual amenity

- 6.18 A second aspect to amenity is visual. The proposed building elevation is positioned at its closest point 49m west of homes at Pentre Maelor. This closet point is actually a corner of the terrace and direct line of sight from rear elevations achieve separation of some 65 metres at the closet positions. Figure 10 illustrates this point.
- 6.19 Those separation distance achieved is substantial and essentially in line with emerging LDP Policy EM6 for 50m separation. Moreover the space between the homes and site

contains a substantial tree belt. Extract at Figure 11 is from the submitted Section A-A drawing demonstrating the depth and height of the tree belt canopy.

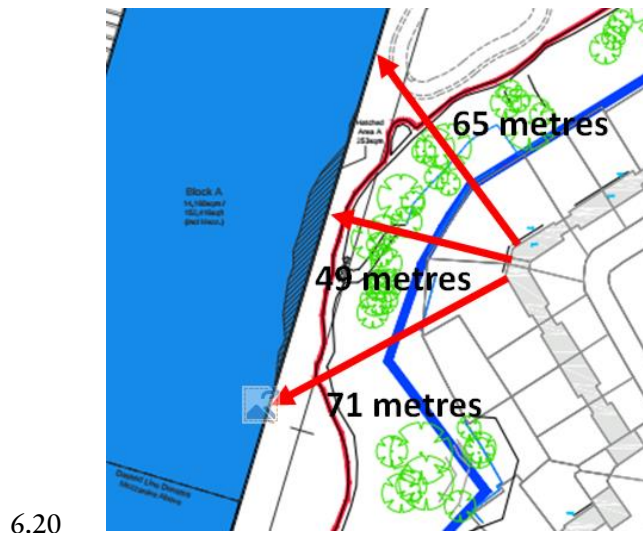


Figure 10: Distances between closest homes and windows to proposed buildings

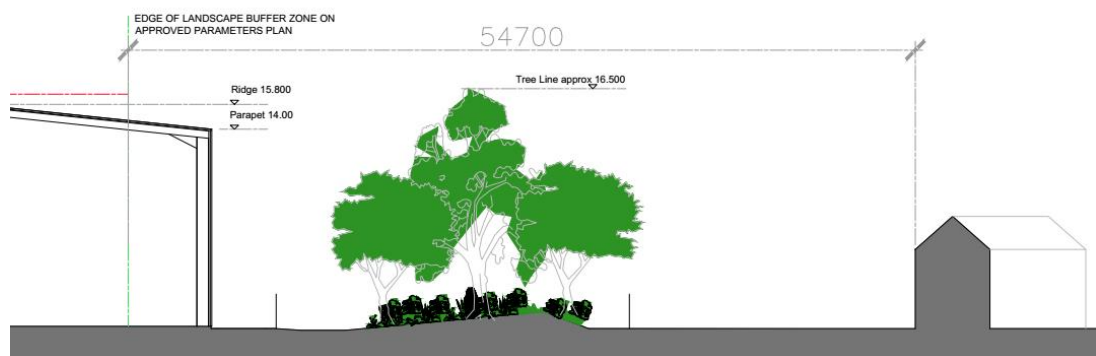


Figure 11: Extract drawing Proposed Section A-A 1200-04-001

- 6.21 Figure 11 denotes the approved Parameter Plan (green line) from permission P/2018/1087 and position of any building relative to the buffer and maximum height at 16.5 m to ridge (red line – see full drawing for annotation). Three points are made; first the building is separated by 49m and is closer by 4.5 metres than the parameter; second the ridgeline is lower in this detailed building by 0.7m (15.8 m) to the approved parameter; third the tree belt situated between has a canopy height of circa 16.5m and similar depth.
- 6.22 Figure 12 provides a series of drone images showing a reverse view from the proposed building ridgeline position at 15.80 metres above existing site level toward the houses.



East boundary - NE



East boundary - Central



East boundary - SE

Figure 12: Drone footage taken @15.80m above ground at position of ridge line of proposed warehouse, views taken toward Pentre Maelor housing

- 6.23 Immediately apparent in the views is the effect the height and depth of the tree belt has in obscuring both windows and homes from view.
- 6.24 Where any view is available from the closest homes the 45-degree orientation of elevations means any direct line of sight is cast away from the proposed building or will be significantly more distance, i.e. 70-100 metres per Figure 10. And in all cases this direct line of sight is still partly obscured by the trees, i.e. it is not a clear, unencumbered view.
- 6.25 Figure 13 is from the same drone footage but is taken to the southern end of the eastern boundary where the tree coverage is at its thinnest. This is the clearest available view identified. Figure 13 image shows views are available but at this point the direct view is to the proposed car park south of the offices and therefore of very limited visual impact.



Figure 13: Drone footage taken @15.80m above ground at position, southern end of eastern boundary – extract layout plan to position view

- 6.26 What this means to assessment on impact of visual amenity is despite the building being 4.5 metres closer to the eastern boundary than the approved Parameters Plan envisaged at this closest point to homes it is in effect visually no more apparent in available views. And it should be recalled the Parameters Plan did not present a straight line but a sinuous line parallel to the boundary meaning built development, this assessment is at the pinch point and at worst the building is separated by 49m from the corner blank wall.
- 6.27 Any available views beneath the tree canopies, which is itself very limited by dense scrub / ground vegetation, is essential no different to the lower part of the building in the approved parameters or this proposed building.

- 6.28 Winter will allow more filtered views when leaf cover is reduced, though at low level the density of scrub and mix of evergreen species limits this change. It is considered even in the short winter months and days the impact is visually acceptable given the separation distance and 45-degree angle of views at the closest available points, and not material different to the approved parameters.

Amenity conclusion

- 6.29 We say that the nature and character of the existing landscape and relative orientation and separation of existing and proposed buildings will not give rise to unacceptable impact on residential and visual amenity. And this is before consideration that it is proposed to strengthen the existing tree screen through landscaping. This will create an effective and long lasting functional buffer as required by policy.
- 6.30 Accordingly, the proposed development will introduce a modern, high quality development that the site is allocated for in both the adopted and emerging local plan documents. And proposed development and its envisaged use and operation will not impact on amenity levels enjoyed by softer uses like residential which although in the wider vicinity are sufficiently distant and separated not to be adversely affected.
- 6.31 These are factors to be considered in support of the proposed development.

Ecology

- 6.32 The findings of a Preliminary Ecological Appraisal, prepared by ecological advisor UES, notes that the development site is comprised almost entirely of unimproved grassland. The Appraisal highlights potential issues with the following ecological receptors on or adjacent to site: amphibians, badgers, bats, birds, plant communities and woodland.
- 6.33 It is relevant to note the applicant's ownership extends greater than the red line and development area offering potential for ecological enhancements over a greater area to mitigate development impact. The Appraisal presents its recommendations for mitigation in context of this point and these are carried through in to the Landscape and Ecological Management Plan (LEMP) also prepared by UES.
- 6.34 The LEMP conclusion sets out that a bottom-up approach is taken to improving the biodiversity on the site to ensure that the habitats retained, improved or formed can support a range of invertebrate species and provide food sources, which will then in turn benefit fauna further up the food chain. The proposals specifically address the loss of an

area of unimproved grassland to facilitate the development proposals and compensation of habitats lost. This is the same approach as approved in principle under outline permission P/2018/1087.

6.35 Considerable detail on the habitat proposals is set out within the LEMP, Section 3 Landscape and Habitat Management and appended drawings. It is not intended to repeat this information, but to stress the extent of coverage of issues considered which are:

- Habitat management – mixed woodland; unimproved grassland; scrub; ponds; swale creation; native species-rich hedgerow; bat boxes; bird boxes; hibernacula and log piles; amenity landscape planting
- Responsibilities, monitoring and remedial measures
- Management schedule

6.36 The LEMP is proposed for approval and implementation of measures through planning condition to meet relevant policy requirements. A detailed Landscape Planting Schedule will be developed for submission and approval under planning condition linked to the requirements of the LEMP.

6.37 Some matters may be required to be secured through a Section 106 or Unilateral Undertaking, as per the outline permission, for ecological mitigation and improvements that must be secured on land within the applicant's control outside the red line boundary. The basis for this agreement will follow P/2018/1087 in agreement with officers. Planning condition(s) will otherwise secure mitigation measures and long-term maintenance.

Flood Risk and Drainage

6.38 Barnsley Marshall has considered flood risk and drainage.

6.39 On flood risk, the Barnsley Marshall flood risk assessment considers the overall flood risk associated with the proposed development. This work was carried out in accordance with TAN 15 *Development and Flood Risk*, Chapter 9: Summary of Policy Requirements. The overall findings of the flood risk assessment are that the development can be regarded as a Less Vulnerable Development in Flood Zone A, meaning it can be regarded as acceptable in terms of risk of flooding from sea water courses or other means. In essence, there is no flood risk associated with this development, including risks relating to river and coastal

flooding, other than to avoid increasing risk elsewhere. And the assessment also confirms that the Justification Test is not applicable. The site can therefore be regarded as suitable for the type and scale of development proposed by reference to flood risk.

- 6.40 On drainage, the key findings of Barnsley Marshall, which are set out in their drainage report, confirm that a satisfactory SuDS drainage strategy can be put in place and implemented to allow the satisfactory development of the site for the proposed development. This has at its heart the principles of a modern SuDS system.
- 6.41 The SuDS drainage strategy properly encompasses and sets out a discharge hierarchy, sets out how the SuDS appraisal was conducted and on what it is based (on the accepted SuDS hierarchy), sets out a surface water drainage strategy, covers management of pollution control and water quality, considers spillage and sets a spillage management strategy, establishes a foul drainage strategy, establishes a strategy for maintenance and Operation (which will be through the submitted SuDS Operation and Maintenance Manual).
- 6.42 Overall, it can be concluded by reference to the above that the application site can be regarded as being at low risk of all forms of flooding and can be satisfactorily developed by reference to SuDS proposals. As such the application can be regarded as acceptable for the form and scale of development covered under the planning application.

Phosphates and Foul Drainage Strategy

- 6.43 Bradley Marshall has developed a Foul Drainage Strategy, (Section 3.8, Drainage Strategy Report), to address the specific issue surrounding phosphates and new developments presenting potential increase to phosphates discharge into the public sewer system, and its capacity to treat.
- 6.44 The nature of the PAC response from Welsh Water and NRW is set out in Comments 1, 6 & 10 in the accompanying PAC Report.
- 6.45 The strategy is:

Foul drainage from the proposed building shall be collected by a proposed gravity foul drainage system to a proposed APEX Onsite Treatment Plant. The treatment plant has a phosphorous removal kiosk which ensures that treated effluent coming out of the plant has a phosphorous concentration less than or equal to 1.0 mg/l. It is proposed to discharge the treated effluent via a rising main to an existing Welsh Water public foul sewer along the south-western edge of the site.

A connection to the existing sewer shall be made via a new manhole, refer to plan layout drawing number S5A-BML-XX-XX-DR-C-0500 in Appendix D.

An S106 WIA Direct Connection consent shall be obtained before construction begins.

It is hoped that the response from Welsh Water will be similar to the one they gave for another scheme within Wrexham Industrial Estate as below:

'No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site. We can advise that Five fords WwTW has a phosphate permit. This matter will need to be considered further by the local planning authority.

- 6.46 As the final sentence highlights the developed approach is one to be agreed with the relevant statutory consultees and remains a live discussion. Officers and the Council are only too aware of the need to find suitable on-site solutions to allow development to come forward. It is hoped that the approach developed by Bradley Marshall can receive support not only for this scheme but present a template to approaches on other sites FIREM intends to bring forward / improve within WIE.

Employment support and generation

- 6.47 The site though allocated for development is currently undeveloped and therefore offers no employment or economic benefit.
- 6.48 Regarding the potential for job creation, guidance in the Employment Density Guide, 3rd Edition, HCA (2015) sets multipliers of FTE job creation by floorspace and use. Refined from the consultation position the use is now focused to B8 warehouse use with ancillary offices.
- 6.49 The proposed floorspace is 14,147 sqm in Class B8 Use. The HCA employment density offers three measures for national and regional distribution centres, and final mile distribution centre. No end operator is known but the scale and market position places this reasonably a regional distribution centre, an employment density for 1 FTE member of staff per 77 sqm GEA. Applied to the floorspace this leads to an estimate of 183 FTE employees.
- 6.50 We have not sought to disaggregate the ancillary office floorspace. Offices in such units typically are not occupied at densities of a standalone office and will usually

accommodate support facilities to the main warehouse operation including rest areas, lockers, WC / showers, canteen, storage, etc. Moreover warehouse operations often involve roles that move between warehouse floor and office which would lead to double-counting.

- 6.51 The potential 183 FTE jobs identified is considered a matter of significance in delivering on policy objectives to provide employment within the borough and at WIE which should be given significant weight in the planning balance.

Access and Transportation Considerations

- 6.52 Access and transportation matters are covered in detail in the Transportation Assessment by Prime Transportation.
- 6.53 The assessment considered the highways and transportation implications associated with the proposed development and was prepared in accordance with Planning Policy Wales and Technical Advice Note 18: *Transport* as well as a number of local policy documents. It considers the accessibility of the site and safety for all modes of travel from the private car to more sustainable modes such as walking, cycling and public transport.
- 6.54 A review of personal injury accidents that have occurred on the local highway network was undertaken for the most recent five-year period. An analysis of those 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.
- 6.55 The two main vehicular accesses will be provided from Clywedog Road South. The proposed footway will extend on to Clywedog Road South and connect to the existing provision along the northern verge opposite the sites northern access. A separate pedestrian/cycle only access is also to be provided onto Clywedog Road South.
- 6.56 Car and cycle parking are to be provided in accordance with parking standards based on Class B8 Use, providing 140 parking spaces including allowance for disabled and EV charging spaces, and 16 covered cycle spaces.
- 6.57 An assessment was 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.

- 6.58 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.
- 6.59 The development traffic will also have a negligible to minor impact on the surrounding highway network.
- 6.60 The overall conclusions of the assessment are 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 impact on the operation of the surrounding highway network. This extends to covering how the site is proposed to be accessed for HGVs and cars, how it can be accessed by different modes of travel, the operation of the transportation elements of the wider scheme, which takes into account car parking and other parking provision and the impacts and effects of the proposed development on the local network and other transportation matters of relevance.

Ground Conditions

- 6.61 The application site is undeveloped. However, it is not greenfield in profile. Throughout the period of the Second World War and immediately beyond it the site formed part of a huge munitions factory complex operate by the Royal Ordnance which in time became WIE. See plan at Figure 3. This plan indicates that the site was developed and in use as part of this operation, most probably as part surface/part subterranean storage bunkers, accessed off what in time became Clywedog Road South.
- 6.62 This is evidenced through site investigative works by SP Associates. The related report confirms that the site was developed for a number of square/rectangular structures used as part of the Royal Ordnance factory. Although all structures and mounds had all been cleared from the site by 1984 the site's history means it can be treated as previously developed land.
- 6.63 The work by SP Associates, set out in its ground investigation report, considered the site's history, geology, hydrology, existence of radon gas and involved direct ground investigation. This was through boreholes, trail pits, dynamic probes and standpipe monitoring. Samples were taken and subject to laboratory testing.

- 6.64 The key findings of the SA Associates ground investigation report confirm that the subterranean ground conditions can be regarded as normal for a site of this profile and that the site can be regarded as suitable for development. A further finding is that foundation design does not need to be specialist and can be either of conventional strip or pad footings design. It also makes other recommendations, all regarded as normal for sites of this nature, which would be followed through the construction phases of the project.
- 6.65 The work by SP Associates confirms that the application site is brownfield in context and is suitable for development including for the type, form and scale of developed envisaged through the proposed planning application.
- 6.66 As such the planning application and proposed development can be regarded as acceptable and supportable by reference to ground conditions.

Air Quality

- 6.67 Wardell Armstrong has carried out an Air Quality Assessment. The assessment considers the effects of the proposed development during construction and once completed and operating. The findings are summarised in the Assessment conclusions that:
- Construction phase impacts on air quality are not significant with implementation of mitigation measures to suppress dust and fine particulate matter from earthworks, construction and track out. This can be controlled through relevant planning condition for a Construction Environmental Management Plan (or similar)
 - Operation phase impacts on air quality is also found as not significant. This finding is based on assessment of 15 existing human receptor points, including residential properties at Pentre Maelor, with assessments undertaken in accord with Defra guidance. Findings show pollutant concentrations at 2027 as below relevant annual mean objectives and finds negligible impact on concentrations of NO₂, PM₁₀ and PM_{2.5} at all 15 receptors.
 - On the basis of the finding at operational stage of negligible impact there is no necessity for mitigation measures, but it is noted the proposals do contain provision for EV charging. And though not stated in the Assessment, we would add the thrust of car ownership and government policy is likely to see ever increasing numbers of electric vehicles in use.



Design and appearance

- 6.68 Previous comment has been on the specific inter-relation of the proposed warehouse buildings physically with adjacent residential properties. We accept the appearance is not divorced from such impact considerations, but given the proposed material palette, colour and appearance it is clear the proposed building will not present a visually “difficult” building in the context of the wider WIE within which it is received.
- 6.69 Visually the site will change from an unbuilt area of land with views across from Clywedog Road South to the tree belt at the rear (east) of the site and to the north. And this is also the only public view of the site.
- 6.70 The Design & Access Statement, prepared by MCAU, sets out the palette of materials as a mix of vertical composite cladding (light grey) with small ribbed horizontal cladding with use of contrast colours to accentuate openings. Windows and doors will be powder coated aluminium in grey, with potential use of accent colour. The appearance is clearly not dissimilar to other modern warehouse units in the Estate, including those managed by FIREM, as set in the precedent images and CGIs.
- 6.71 Set behind a future fenced enclosure with service yard and car parking behind, separated by a landscape strip, as well as landscaping to southern point and retained mature planting to north and east as backdrop, the overall appearance of the site will be one of a modern industrial estate premises, attractive on its own terms.

7 CONCLUSION

- 7.1 Before we consider and address whether the proposed development accords with development plan policy, as this is the key consideration in the planning decision making framework in Wales, we conclude on whether the planning application and the proposed development it supports, by reference to the planning and land use matters set out above, can be regarded as acceptable and supportable. This is because some of the topic areas set out above feed into or of direct relevance to specific planning policies identified in Section 5 as being of direct relevance.
- 7.2 Following the detailed assessment set out above, it is our view that the planning application and proposed development it supports can be regarded as acceptable by reference to the site's profile, ground conditions, design and layout, transportation, ecology, noise, air quality, flood risk, drainage and services profiles and all other matters considered.

Accordance with policy

- 7.3 Further to the detailed assessment set out above, we now consider whether the planning application accords with relevant policies in the adopted WUDP. The key identified policies are PS1, PS2, PS3, PS4, GDP1, EC4, EC13, EC17, EI, E8 and T8, which with the addition of Policy E1 is the same set of policies identified in the Officer's Report in 2020 to the permitted outline scheme. Local guidance notes 16 – Parking Standards and 17 – Trees and Development are also identified as relevant in the Officer's Report.
- 7.4 Based on the detailed assessment undertaken it is our view that the planning application accords with the overall principles of development set in strategic policies, including PS1, PS2, PS3, PS4 and E1 and specific requirements related to the site in policies E1, E8, T8, EC4, EC13 and GDP1.
- 7.5 There is an outstanding matter of uncertainty on the treatment of foul drainage in the matter of phosphate controls which comes under the guise of policy GDP1. On the assumption that the proposals made by advisors Bradley Marshall is accepted, or some revision on this through consultation, then this would ensure a compliant development. Indeed it would mark a significant contribution to the Council in how it can work with developers to work through the issue to unlock development potential.

- 7.6 The proposal will deliver significant new employment opportunities to the borough in line with strategic policy objectives, even if the adopted plan period has somewhat aged, the need persists as evidenced in the emerging plan. As a site location the WIE remains the key strategic site to deliver those jobs and this type of mid / large size warehouse unit. By doing so it satisfies broadly the location, transport and accessibility facets of policy.
- 7.7 Environmental and ecological matters are addressed through a comprehensive proposal for landscape and habitat mitigation from a bottom-up approach set out in the Landscape Environmental Management Plan and Preliminary Ecological Appraisal authored by advisors UES and submitted for approval.
- 7.8 Key concerns on amenity – residential and visual – have been considered and addressed to minimise impact and potential for harm to residents of Pentre Maelor to such a degree we consider such impact will be minimal to their amenity, particularly once landscape proposals being introduced are accounted for. This accords with the broad and specific policy protection afforded to the enclave of homes within the WIE.
- 7.9 We are also of the view that the proposed development broadly accords with emerging policies still yet to be adopted WLDP. The Council will set its own stall as to the weight it affords, but with exception to matters and policies affected directly or indirectly by the phosphates issue, we consider weight can be given and that support is lent to the proposals. Namely under policies SP2, SP9, SP10, SP12, SP13, SP14, SP15, SP19, DM1, NE3, EM6, T1 and RE1. Policy BE6 on waste water treatment is clearly in abeyance but as with commentary on adopted policy GDP1 it is considered the proposals have addressed the fundamental concern on phosphate control in effluent emissions.
- 7.10 At national level the proposal aligns with the promotion of sustainable development In PPW11, providing support to the social and economic well-being of the community though access to new jobs, and leading to no harm following mitigation measures to matters of environmental concern. Though no specific support is given to cultural matters, equally no harm arises.
- 7.11 As with the local policies the development is the right place to support the local economy, and by extension the national economy making best use of the existing infrastructure and the strategic importance of the WIE location. Encouragement of economic growth is a central objective to PPW11, Section 5.



- 7.12 In relation to Technical Advice Notes advised of in Section 5 the proposal is found to accord to approach, principles and expected outcomes for a warehouse development of this type in matters of economic development (TAN23), design (TAN12), transport (TAN18), noise (TAN11) and development and flood risk (TAN15).
- 7.13 Overall, the planning application and the proposed development it supports can be regarded as according with the currently adopted development plan and also the emerging plan; also the provisions of national planning policy set out PPW11 and relevant TANs identified in an earlier section. It can also be regarded as being acceptable by reference to all usual and applying planning and land use considerations. Accordingly, the planning application can and should be granted.