



PLANNING STATEMENT

In support of a proposed development for the Erection of extensions to industrial unit, construct second means of access, reconfigured service yard and parking, landscaping and ancillary works

Unit 47 and 48 “Dragon Packaging”, Clywedog Road North, Wrexham Industrial Estate LL13 9XN

Made on behalf of FI Real Estate Management Ltd

NOVEMBER 2022

DOCUMENT REFERENCE: FI009-01 v3



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DATE	NOVEMBER 2022		
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1 SUMMARY STATEMENT

- 1.1 FI Real Estate Management (“FIREM”) is applying for planning permission to erect two extensions to either side of existing combined Units 47 & 49 Clywedog Road North, alongside an additional means of access onto Clywedog Road South (egress only), an enlarged and reconfigured service yard, landscaping and ancillary works.
- 1.2 The application is made in support of the existing tenant, Dragon Packaging Limited, in support of its business expansion at the site.
- 1.3 Dragon Packaging specialises in the production and distribution of thermoformed packaging for food and non-food manufacturers. On site production facilities create the thermoformed packaging to order to customers which are then stored and distributed from the warehouse.
- 1.4 The proposal for the two extensions to northwest and southeast side elevations will provide additional warehouse facilities for storage and distribution. Comparison of existing and proposed floorspace is provide in the table below:

	Existing Premises	Proposed Premises	Difference
Offices (2 floors)	390 m ²	390 m ²	0 m ²
Warehouse / Manufacturing	1,569 m ²	1,569 m ²	0 m ²
Warehouse NW extension	-	848 m ²	+848 m ²
Warehouse SE extension	-	848 m ²	+ 848 m ²
Total floorspace	1,959 m²	3,655 m²	+ 1,696 m²

- 1.5 The existing warehouse is considered to be in a mixed B2 manufacturing / B8 warehouse use; the proposed extensions will be for B8 warehouse use only. The overall extended unit will still be in a mixed use but the ratio of floorspace will change from an approximately 50/50 split to 25/75 split between Use Classes B2/B8. Ancillary office space will be unchanged.
- 1.6 Proposed extensions will be clad in a profile sheet system in grey with colour trim similar to treatment to other premises under FIREM control within the industrial estate as part of its established branding. For the existing units these will be reclad to match to create a unified building with the offices to front retained in their existing brick finish as contrast and accent on the different role.



- 1.7 Service area to the front will be extended to accommodate the new units with the loss of some trees and grassed areas within the site. Those trees lost are identified as the least important for retention and the proposal has been shaped to retain the more important trees around the existing site entrance and boundaries, thereby maintain the setting of the building and wider estate road. Additional replacement tree planting to northwest and southeast boundaries are proposed to compensate those lost.
- 1.8 The service yard area will provide space for car parking to perimeter and to front of the offices with loading bay accesses to either side of the office block. An additional site access (proposed as egress only) is added to support the operation of the unit and simplify vehicle movements to reduce need for turning of HGVs within the site.
- 1.9 New landscaping, including aforementioned trees, sustainable urban drainage, ecology mitigation measures and ancillary works complete the development picture.
- 1.10 Ecology mitigation will include measures to avoid disturbance to, manage and provide habitat to support Great Crested Newts under licence and guided by an agreed Framework Strategy as required by NRW. The Framework Strategy is being prepared by scheme ecologist, UES, and will be presented post-submission of the application.
- 1.11 Dragon Packaging's investment plans may lead to 10 full time positions, increasing employment at the site from an existing 48 staff to a maximum of 58.
- 1.12 In planning policy terms the site is located within the defined area of Wrexham Industrial Estate. The site can be regarded as appropriate for the form and profile of development proposed under the planning application. Surrounding the site is a mix of industrial and employment developments. Accordingly, in land use terms the site's context is developed and mainly industrial and commercial in profile and is typical of estates of this ilk.
- 1.13 The site is allocated for industrial / business use in the adopted development plan, *Wrexham Unitary Development Plan*. This is also the case in the emerging, though delayed, *Wrexham Local Development Plan* which is intended to be adopted once the phosphates issues is resolved, primarily now on matters of housing allocations following updated NRW advice in July 2022 relating non-residential development. The proposed development is compliant in principle to the land use designation of the application site in both the adopted and emerging development plans for the area. The planning application also accords with national planning policy in *Planning Policy Wales* and related *Technical Advice Notes* as set out later in this Statement.



- 1.14 The planning application is 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 (mitigation and habitat value) and drainage (no material increase in facilities to trigger concern on phosphates).
- 1.15 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. Accordingly, the planning application can and should be granted.

2 INTRODUCTION

2.1 This Planning Statement has been prepared by Plan Red on behalf of the applicant, FI Real Estate Management Ltd (“FIREM”). FIREM is applying on behalf of its tenant, Dragon Packaging, who will continue to operate from the site and extended premises.

2.2 This Statement is submitted alongside the following drawings, documents and technical details:

- Covering letter
- Planning application forms, certificates and notices
- Drawings:
 - 1211-02-001 P2 Existing Site Plan (Red Line) 1:1250
 - 1211-02-002 C Proposed Site Plan 1:500
 - 1211-05-000 P1 Existing Elevations 1:200
 - 1211-05-001 P1 Proposed elevations 1:200
 - 197-T_300 Tree Constraints Plan 1:500
 - P22015-001B Proposed Access Strategy 1:500
 - P2015-002 Swept Path Analysis 1:500
- Design and Access Statement (by MCAU)
- Planning Statement (by Plan Red) – *this report*
- Waste Management Plan (by Plan Red)
- Pre-Application Consultation Report (by Plan Red)
- Transport Statement (by Prime Transportation)
- Arboricultural Impact Assessment & Method Statement (by MD Landscape)
- Preliminary Ecological Appraisal (by UES)
- Flood Consequence Assessment (by Integra)
- SuDS Strategy (by Integra)
- Phase 1 Site Investigation Report (by Integra)

2.3 A further document will be submitted post-submission:

- Framework Strategy (by UES)



2.4 This additional document is requested by NRW and has been commissioned by the applicant to address concerns on the management and necessary mitigation measures for great crested newts.

2.5 The scope of the statement is as follows:

- Section 1 provides a summary statement
- Section 3 sets out background on the applicants and the impetus for the planning application
- Section 4 sets out a summary on feedback provided through the PAC process
- Section 5 describes the application site and its vicinity
- Section 6 describes the proposed development
- Section 7 summarises the planning framework applying to the application site
- Section 8 sets out our assessment of the proposed development and the case in support of the planning application
- Section 9 sets out conclusions on the matters addressed by the statement



3 BACKGROUND ON PLANNING APPLICATION

About the Applicant

- 3.1 FIREM was established 40 years ago. It provides workspace, asset and property management services. It is also an experienced developer and this is becoming an increasingly important activity. Most of its employment related schemes once developed and completed are then added to its diverse investment portfolio, which includes industrial, office, retail and residential premises.
- 3.2 FIREM's guiding principle is that every property related intervention and action creates the opportunity to create better quality floorspace and buildings and generate value. Its property development arm was established to focus on creating places of quality and distinction, which offer opportunity and through an approach defined by a commitment to excellence. And it has recently created its own construction arm, FI Construction, to develop out its schemes in house.
- 3.3 As a responsible developer, FIREM works closely with local authorities, its partners and communities to ensure a cohesive and quality approach is taken to all of its projects.
- 3.4 FIREM currently asset and property manage many hundreds of thousands of square metres of industrial and commercial property and floorspace and is adding to this monthly through new developments and acquisitions. Units 47 and 48 Clywedog Road North is one such property it manages on behalf of the tenant, Dragon Packaging Limited.

Dragon Packaging Limited

- 3.5 Dragon Packaging Limited was founded in 2002. The company provides thermoformed packaging solutions for both food and non-food manufacturers, such as cosmetics and gift industries. The company can provide a diverse range of packing in a small or large production runs from its facility at Wrexham Industrial Estate.
- 3.6 The company currently employs 48 people at its site which operates as a combined manufacturing and storage / distribution depot for thermopackaging.
- 3.7 Diversification and expansion of companies it markets to requires an expansion of its ability to store and distribute completed product at the site. It has worked with FIREM to develop a scheme to expand the premises to enable it to remain on site, and in production, during development works.

4 PAC RESPONSES

- 4.1 The separate Pre-Application Consultation Report (PAC Report) provides full details on the consultation undertaken and responses received.
- 4.2 Only three separate entities responded, Natural Resources Wales (NRW), Wrexham Council's Environmental Health officer and Abenbury Community Council. Though a limited response it is not altogether surprising given the proposal relates to an existing commercial premises within an established industrial site.
- 4.3 In summary NRW made four comments concerning European protected species, focused on great crested newts; protected sites in connection with phosphates; land contamination in connection with the past use of the wider industrial estate as a munitions production facility; and flood risk.
- 4.4 NRW seeks in the first comment a Framework Strategy relating to great crested newts which the applicant has commissioned from ecologists UES. This will be submitted in support of the application once complete for NRW review and comment. NRW also suggests planning conditions which are set out in the PAC Report.
- 4.5 In the second comment we address the phosphates issue and standing guidance of NRW later in this report (see Section 8, sub-section Phosphates). In its third comment the submitted Phase 1 Site Investigation Report prepared by Integra addresses points raised and again NRW suggest standard conditions for council consideration. And on its last comment on flood risk the NRW notes the site is within Zone A.
- 4.6 Wrexham Council Environmental Health officer proposed standard planning conditions concerning dust management during construction, noise generation, working hours and burning of waste on site. In response a Construction Environmental Management Plan (CEMP) is being prepared by the applicant for approval.
- 4.7 Abenbury Community Council (ACC) has raised two points. One is site specific in concerns on existing operation, yard use and litter. This proposal will directly address this concern by providing additional, needed warehouse facility to remove the need for external storage. The second concern is generally aimed at a lack of HGV facilities within the industrial estate and problems of litter and anti-social behaviour. This application cannot address this concern directly but will provide adequate on-site parking for HGVs.

5 PLANNING APPLICATION SITE

Site Location

- 5.1 The site is located at Units 47 and 48, Clywedog Road North, Wrexham Industrial Estate.

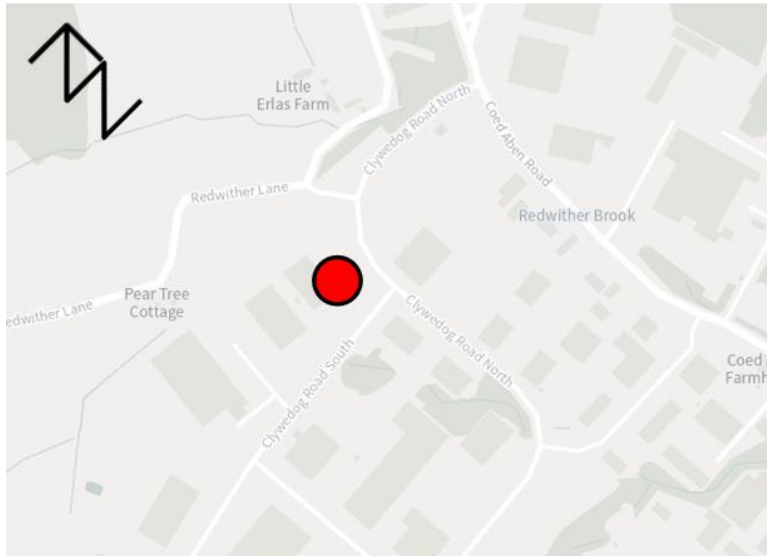


Figure 1: Wrexham Industrial Estate and Site Location

- 5.2 The site extends to approximately 1.30 hectares.

Existing use and floorspace

- 5.3 The site is presently comprised of two units, combined in use as a single unit by Dragon Packaging Limited, as a mixed B2 manufacturing and B8 storage and distribution use. The split being approximately 50/50. There are ancillary offices, stores and welfare facilities over ground and first floors to the front of the premises.

Table 1 Existing floorspace and use, Units 47-48

	Existing Premises
Offices (2 floors) (ancillary use)	390 m ²
Warehouse / Manufacturing (Class B2/B8)	1,569 m ²
Total floorspace	1,959 m²



Grounds

- 5.4 To the front of the premises is a service yard accessed from a single point to the north off Clywedog Road North. The premises are laid out with a two-storey office central to front of the main unit behind. The offices are brick finished with profile sheet cladding to the main units.
- 5.5 Parking is provided in two locations, a handful of spaces in front of the offices and a small parking area partially separated to the northwest of the service yard.
- 5.6 To southeast the service yard extends toward the highway boundary. This area is main used for storage of trailers and loading / unloading of goods. Current movements within the yard are restricted by the single access point and parking of trailers and external storage of materials. In essence this is the impact of the business success and why it needs to expand and improve the premises.
- 5.7 To west, north and east boundaries, the latter two fronting the junction of Clywedog Roads North and South, are landscaped with grass and tree planting. The southeast boundary is more open and mainly to grass in front of the building.
- 5.8 The site is generally level with a slight fall toward the southern boundary.

Surroundings

- 5.9 The site is located to the western side of the industrial estate, access off the main circulation route between northern and southern access points.
- 5.10 Units in the vicinity are generally medium scale, single-storey industrial units in a mix of manufacturing, storage and distribution uses, i.e. Use Classes B2 and B8, with ancillary office uses.

Drainage and Flood Risk

- 5.11 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.

Site Photos



Image 1 – Main entrance



Image 2 – Building frontage and yard



Image 3 – Clywedog Road North, site to left of frame



Image 4 – Corner site at Clywedog Road South, view to yard, building obscured



Image 5 – SE side elevation seen from Clywedog Road South

6 PROPOSED DEVELOPMENT

6.1 Specifics of the layout and design of the proposed development are depicted through the pack of application drawings and are also described in detail in the Design and Access Statement (“DAS”) prepared by MCAU.

6.2 The planning application is submitted for:

Detailed planning application to erect two warehouse extensions, (combined floorspace 1,696 sqm, Use Class B8), external alterations, enlarged and reconfigured service yard, additional means of access onto Clywedog Road South, landscaping and ancillary works.

6.3 The position of the unit and available land creates opportunity to extend the units to either side in a mirror image of two 848 m² extensions for B8 warehouse and distribution use. To tie the appearance of the development as a single unit the existing warehouse units will be reclad to match the new extensions, with only the brick façade of the office retained as contrast and legibility as the site entrance. The southeast side extension will have a higher ridge line at 11.85m compared to the existing unit and northwest extension of 8.82m. This is to allow high bay racking systems to be used in the southeast extension which requires a parapet height of 9.81m.

6.4 Details of materials and appearance are set out in the DAS.

6.5 The two extensions will approximately double the floorspace of the premises.

Table 2 Existing and Proposed Floorspace

	Existing Premises	Proposed Premises	Difference
Offices (2 floors) (Ancillary use)	390 m ²	390 m ²	0 m ²
Warehouse / Manufacturing (Class B2/B8 use)	1,569 m ²	1,569 m ²	0 m ²
Warehouse NW extension (Class B8 use)	-	848 m ²	+848 m ²
Warehouse SE extension (Class B8 use)	-	848 m ²	+ 848 m ²
Total floorspace	1,959 m²	3,655 m²	+ 1,696 m²



- 6.6 As the extensions will be to extend the storage and distribution facilities to support the existing operations the ratio of B2/B8 mix of uses will change from approximately 50/50 to a ratio closer to 25/75 in favour of B8 use but will still remain as a mixed use manufacturing and warehouse / distribution.
- 6.7 The service yard to front will be enlarged to the width of the new, extend units requiring the removal of areas of landscaping, grass and trees, particularly toward the western boundary. As set out in the Tree Constraints Report, prepared by MD Landscape, those trees lost are of lesser value and the revision to the turnout of the existing access has been modified in design to retain trees of greater importance.
- 6.8 Presently there is parking set out to the offices but the rest of the service yard is largely without demarcation. It is operated with external storage of trailers to the south for incoming / outgoing materials. The proposal will allow a more efficient use of the yard with a second access, egress only, onto Clywedog Road South, to assist circulation and manoeuvring of HGVs. Formal parking will be allocated to west and northeast edges of the service yard with footpath access around the perimeter to the unit.

Drawings

- 6.9 Extracts of the proposed development layout and elevations from the submission drawings are provided on the following page. More detail is available in the DAS and other drawings prepared by architects, MCAU.

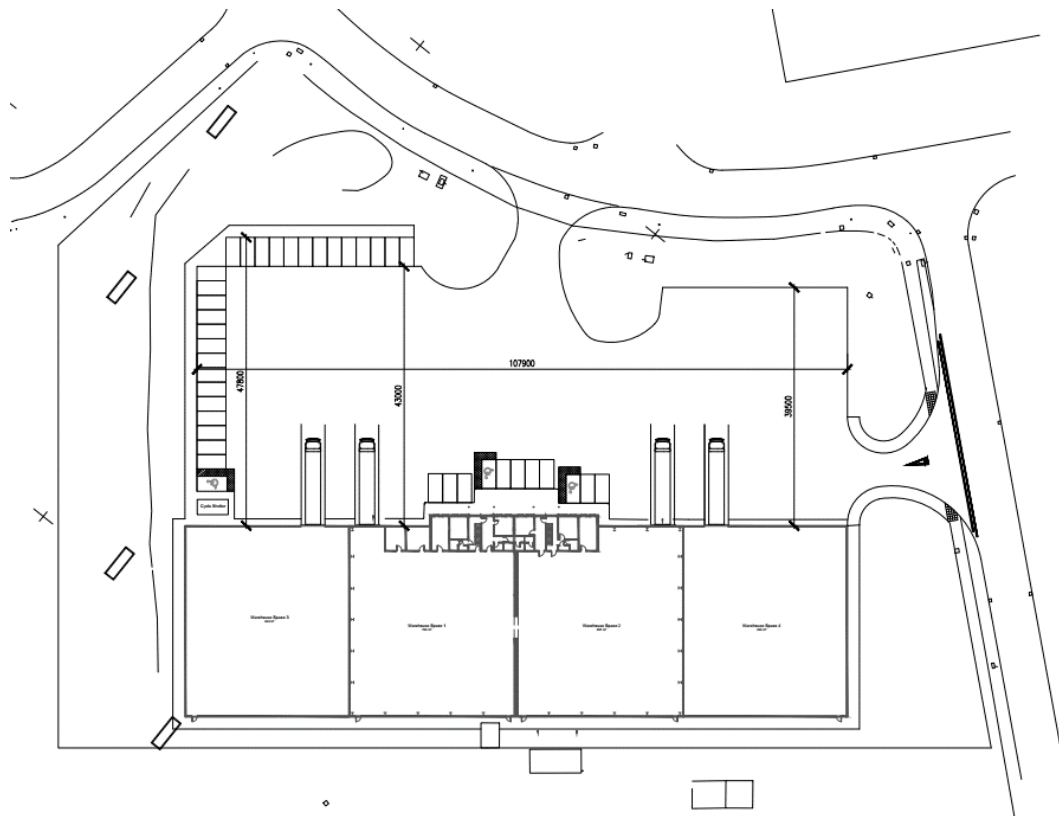


Figure 2 Proposed Site Layout (extract drawing 1211-2-002 C Proposed Site Plan)

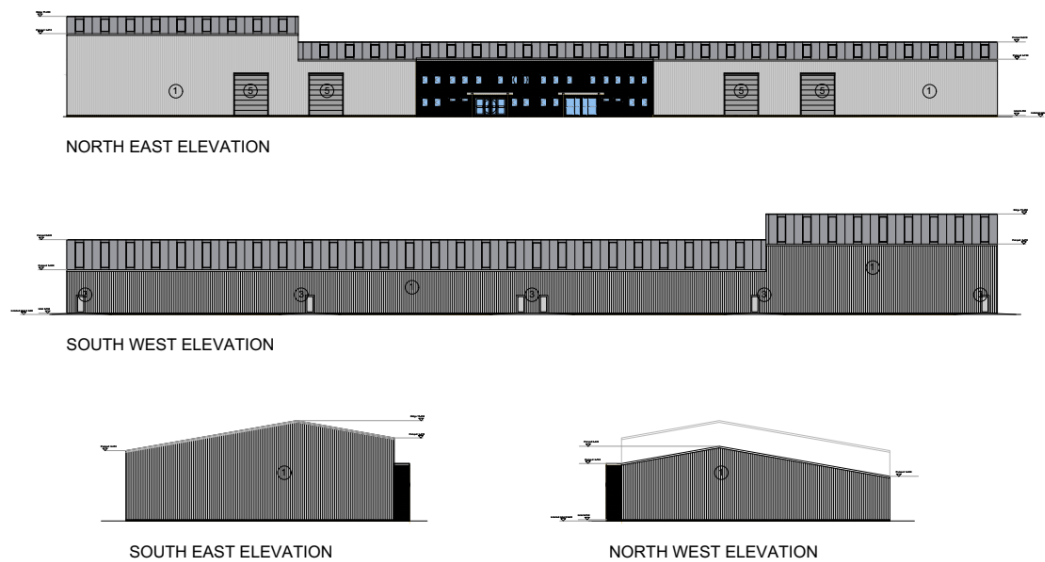


Figure 3 Proposed Elevations (extract drawing 1211-05-001 P1 Proposed Elevations)

7 PLANNING FRAMEWORK

- 7.1 The *Planning (Wales) Act 2015*, the *Well-being of Future Generations (Wales) Act 2015* and other key legislation and resultant duties such as the Socio-economic Duty confirm that a well-functioning planning system is fundamental for sustainable development and achieving sustainable places.
- 7.2 Up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making. Planning applications must be determined in accordance with the adopted plan unless material considerations indicate otherwise.
- 7.3 Material considerations can cover anything to do with the purposes of planning and include all typical planning, development, land use and related factors that have a bearing on whether a planning application should be granted.
- 7.4 It should be noted that national planning policy for Wales has the status of a material consideration in planning decisions, although it can be given greater weight where there is the absence of a comprehensive or fully up to date development plan.

National planning policy

- 7.5 *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.

Local planning policy

Wrexham Unitary Development Plan

- 7.6 The Council adopted the Wrexham Unitary Development Plan (“WUDP”) 1996 - 2011 in February 2005. The plan covers the administrative area of Wrexham County Borough. Policies considered of most relevant to the proposals are as follows;
- PS1 Settlement limits
 - PS2 Environmental Impacts
 - PS3 Make use of brownfield land

- PS4 Maintain existing settlement patterns, character and transport network integration
- E1 Wrexham Industrial Estate
- GDP1 Development Objectives, including:
 - Scale, design, layout, materials and landscaping
 - Accessibility by modes of transport
 - Safeguard from emissions, pollution, flood risk, drainage, etc.
 - Ecology and nature conservation
 - Secure sustainable communities
- EC4 Hedgerows, trees and woodlands
- EC13 Surface water run-off
- T8 Parking



Figure 4 – Wrexham UDP Allocations Plan extract – site identified

Wrexham Local Development Plan

- 7.7 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 (see ‘Phosphorus issue’ below).
- 7.8 Most recent amendments to the emerging plan have been set out in the Schedule of Matters Arising Changes, November 2021, (reference KPD26), which was recently published for consultation which ended on 6 July 2022.
- 7.9 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.
- 7.10 The following policies are considered of relevance to the proposals:
- SP2 Location of new development
 - SP6 Planning obligations
 - SP9 Economic growth employment and enterprise
 - SP10 Wrexham Industrial Estate; including WIE Strategic Ecological Network
 - SP12 Transport and accessibility
 - SP13 Design principles
 - SP15 Natural environment
 - SP19 Climate change
 - DM1 Development management considerations
 - NE3 Trees woodlands and hedgerows
 - NE6 Waste water treatment and river water quality
 - EM1 Protection of Existing Employment Land
 - T1 Managing transport impacts
 - RE1 Development and renewable energy

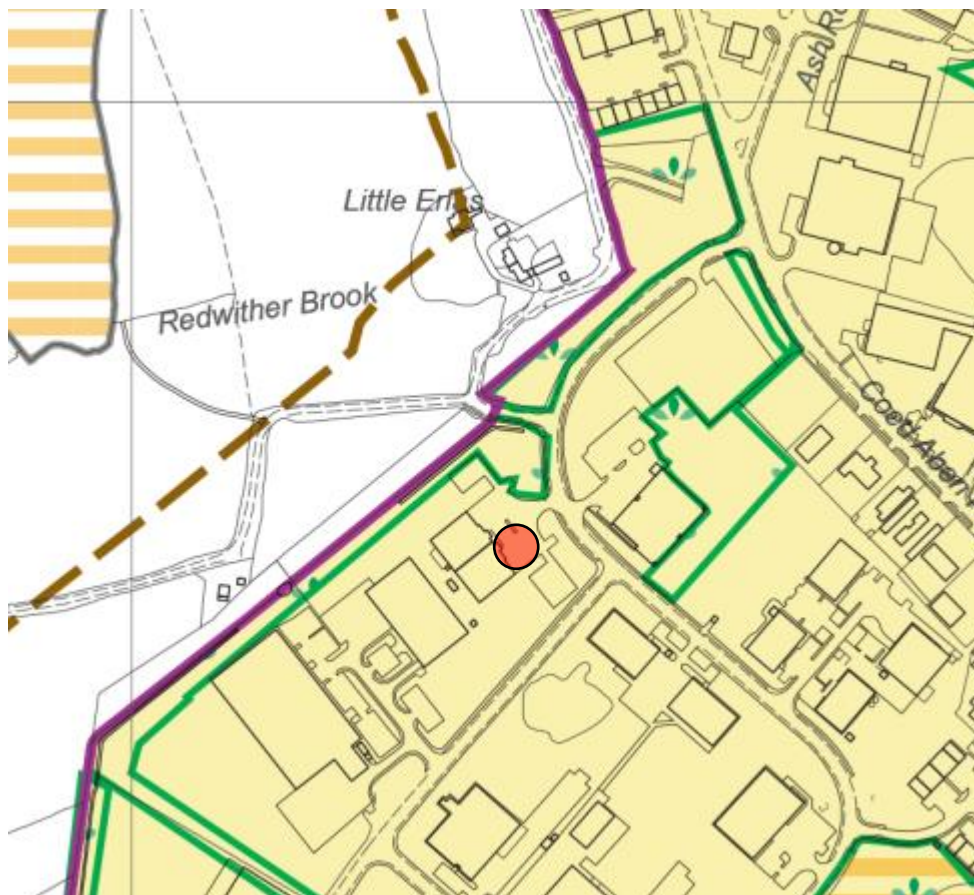


Figure 5 – Wrexham LDP Allocations Plan extract – site identified

- 7.11 The Allocations Plan identifies the site within the Wrexham Industrial Estate and denoted by the green line the existing planting / grassed areas to the north/northwest boundary of the site fall within draft Policy SP10 Strategic Ecological Network.

Phosphorous issue

- 7.12 Significant delay to adoption of the LDP has come about because of guidance issued on phosphates and impacts on sensitive river Special Areas of Conservation (“SAC”); in this instance the River Dee.



- 7.13 At time of submission National Resources Wales, (“NRW”), advice has been updated¹. Its updated advice defines developments around whether it will, or will not, lead to increased phosphorus levels within a river SAC.
- 7.14 Relevant to this proposal it guides that developments intended to provide services, facilities, commercial sites or places of employment for a local population already served by residential connections to existing public or private sewers within the SAC river catchment are unlikely to increase the volume and phosphorus concentration of wastewater.
- 7.15 As commented on later in this report we consider this proposal is unlikely to increase phosphorous levels because this is an extension to an existing business, which employs people living in the local community and will see a very modest expected increase in the workforce (+10 people) who will continue to be drawn from the local population. It is unlikely to lead to an increase in the resident population in the river catchment and therefore will not lead to an increase volume of phosphorus.

Local Planning Guidance

- 7.16 Other Local Planning Guidance notes of relevance are as follows:
- 15 Cycling
 - 16 Parking standards
 - 17 Trees and development
 - 23 Development of Sites with Land Contamination
 - 26 Landscaping and Industrial Development
 - 29 Employment Development and Nature Conservation
 - 32 Biodiversity and Development

¹ *Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation*, Natural Resources Wales Version 3 Final July 2022

8 PLANNING ASSESSMENT

Principle of Development

- 8.1 The site is previously developed land located within the defined urban area of the Wrexham Industrial Estate, (“WIE”).
- 8.2 The site is presently considered to be in a mixed B2/B8 use based on the operation of the existing tenant, Dragon Packaging Limited.
- 8.3 WIE is identified as an appropriate location for industrial development, including the extension and expansion of existing business premises both in terms of locating such land use in an appropriate location away from more sensitive land uses (i.e. residential), and that is appropriate to direct such uses into WIE as the primary employment area within the borough.
- 8.4 The expanded premises in the form of additional warehouse and storage space will enable Dragon Packaging Limited to operate more efficiently and effectively from the site, to expand its business and profitability, and will secure existing employment and offer potential for new employment in the local area.
- 8.5 As a matter of principle the proposed development accords to the land use, character and nature of development set out with WUDP policies PS1 (settlement limits), PS3 (making use of brownfield land), PS4 (maintaining existing settlement patterns) and E1 (Wrexham Industrial Estate as an employment location), and emerging WLDP policies SP2 (location of development), SP10 (Wrexham Industrial Estate) and EM1 (protecting employment land).

Siting, scale, appearance and layout

- 8.6 The proposal involves two separate side extensions, each of 848 m² floorspace, creating a combined expansion of the unit by 1,696 m². This is an 86% increase on the existing floorspace, creating a new 1,959 m² unit. [See Table 2, Section 6 for detailed breakdown].
- 8.7 The existing unit, which is two combined units, is centrally located at the rear of its plot which lends itself to the two side extensions as a design approach. This results in the most efficient completed building for internal operations and rational layout for the service yard and loading bays; compared say to creating a L-shaped building.



- 8.8 Operational the design approach has a minimal impact on the existing business as what will become the central core can maintain operation whilst construction work proceeds. A decision on to build each extension simultaneously or consecutively is for the operator to determine as the construction will lead to a temporarily reduced service yard area.
- 8.9 As a design the scale of the extensions, including the increased height of the southeast extension, follows the broad arrangement and scale of the existing unit and is appropriate to the site and location of an industrial estate.
- 8.10 Because the extensions will be new and the external cladding cannot match the existing, which on its existing southeast elevation already has some fading colour stripes, the decision has been taken to reclad the existing central units to unify and harmonise. The exception will be the brick façade to the two storey offices retained both as contrast and to accent the entrance / office function.
- 8.11 Layout is a simple rectangular form with a mirror image in the service yard to front. The existing parking area will be incorporated into the extended yard through removal of a grassed area between it and the existing yard and expansion toward the northeast front boundary. On the southeast side the existing yard will to be extended to frontage and to the length of the new extension. A second access will be formed off this extended yard onto Clywedog Road South.
- 8.12 These actions will lead to loss of grassed area and a number of existing trees. The impact and mitigation of the loss of the trees is separately considered below in policy, but the necessity derives from the requirement to provide a yard area fit to meet business needs.
- 8.13 Presently the yard area is insufficient to accommodate operational needs for incoming and outgoing goods. Trailers are typically stacked in the southeast area and goods loaded/unloaded externally on the yard leading to significant movement of forklifts to and from the buildings.
- 8.14 The company is keen to improve the efficiency of operations at the site and the proposals will deliver a yard area with sufficient depth to allow trailers to turn and be reversed to loading bays; separate trailer parking can be provided without interference with the yard operation; and all car parking can be kept to the perimeter with separate pedestrian routing to the buildings. It represents a significant improvement over present operations.



- 8.15 Overall the siting, scale, appearance and layout of the proposed extension and service yard will deliver an appropriate, simple industrial building and premises that is fit for purpose to a successful and expanding local business. The development accords with the design principles supported primarily through WUDP policy GDP1 and emerging WLDP policy SP13.

Access and transport

- 8.16 The Transport Statement, prepared by Prime, has been prepared in accordance with PPW and TAN18: Transport advice and local policy, and considers accessibility of the site and safety for all modes of travel. The site location is shown to have no proliferation of highway accidents and none along the site frontage.
- 8.17 The proposal will provide an additional access (egress only) onto Clywedog Road South off the southeast side of the extended service yard. The access will improve the internal circulation of HGVs within the site and reduce the frequency of conflict of vehicles manoeuvring in the vicinity of the existing site entrance that presently carries all movements in and out.
- 8.18 The additional B8 floorspace of the proposals will generate 8 additional trips onto the highway network in the AM and PM peaks. This low level of additional movements means it is expected that the proposed development will have no detrimental impact on the surrounding road network.
- 8.19 The existing car park will be incorporated into the extended service yard with parking bays re-provided around the perimeter. A separate footpath will be provided around the perimeter as a safe, separated route to / from the buildings. The new parking arrangement will provide 39 spaces overall, an increase of 17 spaces with 3 accessible spaces. This accords with the parking standards for B8 use which the extensions will be put to.
- 8.20 Six bicycle spaces will also be provided on site to promote sustainable travel choices. This meets and marginally exceeds parking standards for cycle provision.
- 8.21 The proposal therefore accords with national policy and principles to promote safe access and sustainable transport choices in development, and supports WUDP policies GDP1 and T8, and emerging WLDP policies SP12 and T1.

Landscape and ecology

- 8.22 An Arboricultural Impact Assessment (“AIA”), prepared by MD Landscape, and Preliminary Ecological Appraisal (“PEA”), prepared by UES, accompanies the application.
- 8.23 The key landscape impact is the loss of some areas of existing grass sward and trees to side and front of the existing premises to accommodate the extensions and extended yard area.
- 8.24 The AIA has informed design decisions to retain more important trees, i.e. higher quality, to the site frontage and around the existing access through adaptation of the existing access radii into the enlarged yard area. The Tree Removal Plan illustrates that the majority of trees to be lost are to the northeast to accommodate the yard and parking area, groups G2 (crack willow) and G5 (mix of silver birch, crack willow, whitebeam and apple). It also illustrates that substantial groups of trees are retained, i.e. groups G1, G3 and G4 and individual specimens T15 to T21 are retained around the northwest / northeast corner to the existing site access. This retains the same street scene landscape value and maintains a visual tree barrier to land west of the site / industrial estate.
- 8.25 Elsewhere only one tree, T5, is lost to form the new access onto Clywedog Road South. All other trees to the street corner retained.
- 8.26 In mitigation new tree planting is proposed as illustrated on Mitigation Plan. This shows groups of tree planting to northwest, northeast and the highway boundaries - a total of 45 trees in mix of species.
- 8.27 As well as replacing trees lost as a landscape design response this also aligns with the recommendations of the PEA to replace loss habitat and aligns with the advice to only replace with native species.
- 8.28 The PEA advises that reasonable avoidance measures (RAMs) should be followed given that the site is proximate to areas that might provide suitable habitat for amphibians and reptiles. I.e. it is unlikely any are present on site given site conditions and existing operational development on the site, and this is a precautionary approach for the construction phase of development. The approach is set out in PEA, Section 4.21 and can be controlled through suitable planning condition.
- 8.29 This is to be supplemented by mitigation measures that may be required as identified by a Framework Strategy, currently under preparation by UES for submission. This is a requirement of NRW from PAC response, and the findings of the Framework Strategy

will inform what, if any, measures to protect great crested newts may be required. This will be subject to licence following a grant of permission.

- 8.30 A similar RAMs approach is advocated in relation to potential for badgers to be transiting through the site (PEA, Section 4.2.2).
- 8.31 No specific measures for construction impact mitigation for bats or birds is advocated outside standard planning condition on vegetation clearance, but it is recommended that opportunity is taken to incorporate bird boxes, (PEA, Section 4.2.4), which can be secured through condition.
- 8.32 With exception of the great crested newts the PAC response of NRW did not identify any further actions for habitat / species investigation or mitigation over and above that already undertaken in the PEA.
- 8.33 On the basis of the proposed landscape mitigation, Framework Strategy that will follow, reasonable avoidance measures deployed during construction and mitigation of native species planting and bird boxes that the development will not lead to a negative impact on matters of landscape and ecological importance. This accords with national policy and guidance, and relevant WUDP policies including PS2, GDP1 and EC4, reflected in emerging WLDP policies SP15 and NE3.

Drainage

- 8.34 Integra has prepared two supporting documents, *Flood Consequence Assessment* and *SuDS Strategy*.
- 8.35 The Flood Consequence Assessment demonstrates the proposed development is in Flood Zone 1 and an area of low probability of flooding. The report concludes that the proposed development would be expected to remain dry in all but the most extreme conditions and any impact can be minimised through recommendation on finished floor levels and flood resilience measures set out at Section 7.3.
- 8.36 The Assessment confirms that with the resilience measures undertaken that the consequences of flooding are acceptable and the development will be in accordance with the requirements of TAN15. The Assessment demonstrates the proposed development will be operated with minimal risk from flooding, will not lead to increased flood risk elsewhere and is compliant with TAN15 requirements.



- 8.37 The SuDS Strategy sets out the hierarchy approach assessed. The selected approach to drainage will use underground crate storage beneath the service yard to collect and allow controlled release of surface water into the drainage network. No separate attenuation ponds will be required.
- 8.38 The approach accords with the drainage hierarchy and best practice in accordance with national guidance and local WUDP police GDP1 and emerging WLDP policy DM1.

Phosphates

- 8.39 NRW advice updated in July 2022 directs that local authorities should consider on a case by case basis whether a development is likely to have a significant effect on a river SAC in relation to phosphorus inputs.
- 8.40 As a non-residential development and a proposal for B8 warehouse use which will at most potentially increase staffing levels by 10 people it is considered that the development will not increase the volume and phosphorus concentration of wastewater. In reaching this conclusion it is relevant to consider that this is a local company which employs people within the local area, and the 10 additional staff can be reasonably expected to draw staff from the local population and therefore will not draw more people to live in the River Dee SAC area.
- 8.41 For this reason we concluded that there is no reason to withhold a grant of planning permission related to concerns on phosphates.

Other matters

Ground conditions

- 8.42 A Phase 1 Site Investigation Report, prepared by Integra, supports the application.
- 8.43 The report sets out the background of the Estate being part of the former military / munitions base and potential ground contamination risk. Its recommendations (Section 9) set out a strategy for a Phase II Intrusive Investigation and remediation strategy. Subject to imposition of a standard planning condition to approve and implement the remediation strategy it is considered that there is no elevated risk arising from the development at the site and its proposed end use for commercial purposes.



9 CONCLUSIONS

- 9.1 The development proposals will support the investment by Dragon Packaging, a successful local company, to expand and grow its business leading to increased job opportunities and hoped for greater job security.
- 9.2 In land use planning terms the site is an existing employment site, brownfield land and is being put to a more efficient use through the expansion of the premises and operation on the site. This aligns with national and local planning principles in the location and focus of development in general and employment use specifically.
- 9.3 Impact on existing trees, and associated habitat impacts such as there are for an existing employment site, have been assessed and relevant mitigation proposed through new, replacement native tree planting and following reasonable avoidance measures during construction. In the one area that additional advice is required, the Framework Strategy for consideration of potential impacts on great crested newts, this will be approved and controlled under licence with NRW.
- 9.4 Access to / from the site is improved for the benefit of the site operation of the extended premises and can be safely accommodated on the local highway network. And opportunity has been taken to improve provision for cycling to promote sustainable travel choices.
- 9.5 Matters of ground conditions and any site remediation can be controlled through standard construction approaches. Surface water drainage can be attenuated on site to meet requirements of the drainage hierarchy. Matters of impact to phosphates has been considered and it is our position the nature of the development will not lead to any likely increase in the volume and phosphorus concentration of wastewater, and therefore can be permitted per latest NRW advice.
- 9.6 This is a sustainable development that will support economic and social objectives to support the local economy and community and will not lead to adverse impacts to matters of environmental concern. Planning permission should be granted without delay.