



Wrexham Association

Football Club

Kop Development

Planning Statement

Planning Statement

Kop Development
Racecourse Ground
Mold Road
Wrexham
LL11 2AH

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Planning Statement

The Racecourse Ground, Wrexham AFC



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1. Introduction

1.1. Introduction

1.1.1. This Planning Statement (“Statement”) has been prepared on behalf of Wrexham Association Football Club (“WAFC” or “the Club”) in respect of the Kop Development at the Racecourse Ground, Mold Road, Wrexham, LL11 2AH (“the Site”) or (the “Racecourse Ground”).

1.1.2. WAFC is proposing significant investment through the development of the Kop at the Racecourse Ground. An application is being submitted to WCBC as the Local Planning Authority (“LPA”) for:

“Kop Development for 5,500 spectator seats, inclusive of a 500 capacity hospitality area, with a 600 capacity non-match day exhibition space, new public realm and associated works.”

1.1.3. A detailed description of the proposals, including a breakdown of the elements for which full planning permission are being sought, is provided in Section 3 of this Statement.

1.1.4. The development forms part of the wider ‘Wrexham Gateway’ project, which may also include a hotel and conference centre with hospitality facilities. The Wrexham Gateway project is supported by Wrexham County Borough Council (“WCBC”), Glyndwr University, Football Association of Wales, and the Welsh Government.

1.2. Application Documents

1.2.1. The application documents comprise:

- Application forms and Ownership Certificates;
- Covering Letter (Savills);
- Various drawings (AFL Architects);
- Geotechnical and Contaminated Land Desk Study Report (Ramboll);
- Utilities Assessment (Ramboll);
- Air Quality Assessment (Ramboll);
- Site Waste Management Technical Note (Ramboll);
- Noise Impact Assessment (Ramboll);
- Energy Statement (Ramboll);
- Preliminary Ecological Appraisal (Ramboll);
- Drainage Strategy Report (Ramboll);
- Transport Assessment (including Travel Plan) (Ramboll);
- Match Day Access Strategy (Ramboll);
- Design and Access Statement (AFL Architects); and
- Pre-Application Consultation Report (Royal Pilgrim)

1.3. Statement Structure

- 1.3.1. This Statement describes the development proposals, the planning policy framework, assesses the scheme's planning merits, and concludes about the planning implications of the proposals. In doing so, the Statement draws upon the other supporting documents (referenced above).
- 1.3.2. Collectively, the application and supporting documents explain and assess all aspects of the proposed development. They demonstrate that significant benefits will arise from the Kop Development, that in all respects the impacts of the proposals are acceptable and where necessary can be mitigated, and that the proposals should be granted planning permission in accordance with the presumption in favour of sustainable development.
- 1.3.3. The remaining sections of this statement are structured as follows:
- **Section 2:** Provides a description of the Site, context and planning history;
 - **Section 3:** Describes the proposals;
 - **Section 4:** Describes the Pre-Application Consultation process;
 - **Section 5:** Identifies and summarises the most pertinent planning policy framework to the Site;
 - **Section 6:** Undertakes an assessment of the proposals against the Development Plan;
 - **Section 7:** Draws together a summary and conclusion.

2. Site Description & Context

2.1. Site Description and Context

- 2.1.1. The Site is centred on grid reference SJ32885 50945. The total Site covers an area of approximately 6,420.00sqm, located entirely within the administrative area of WCBC.
- 2.1.2. The Site Location Plan (Ref. WRX-AFL-ZZ-ZZ-DR-A-00100 RevP4) with the Site edged in red is enclosed and identifies the likely extent of the proposed works. There is a blue line which represents other land in the control of the Club.
- 2.1.3. The Site is located entirely within the urban settlement boundary.
- 2.1.4. The application Site is part of the Racecourse Ground, which is the home stadium for WAFC, which includes associated buildings, facilities, car parking and boundaries. The Site presently comprises the existing (unused) Kop, alongside land connecting to Crispin Lane.
- 2.1.5. To the north west of the Site is the Wrexham Glyndwr University Campus including the Students' Union and the William Aston Hall. Immediately to the north is the Wrexham Student Village, beyond that are sports pitches associated with the University and further University buildings. The east of the Site is bound by Crispin Lane, beyond that is the railway line and Wrexham General Rail Station. South west of the Site is Mold Road (A541) and an area of residential properties to the south of the road. Beyond that is Technology Park and the Wrexham Maelor Hospital.
- 2.1.6. The Site falls within Flood Zone A, and therefore is considered to be of little or no risk of fluvial or coastal / tidal flooding.
- 2.1.7. The Site itself has no known heritage assets or historic environment constraints. At a local level, the nearest listed buildings are Plas Coch (part of the University) (Grade II) approximately 500m to the north west and Wrexham General Rail Station (Grade II) approximately 500m to the south east. The nearest conservation area is Grosvenor Road Conservation Area approximately 700m to the south west.
- 2.1.8. There are no known Tree Preservation Orders across the Site.
- 2.1.9. The Site is not subject to any 'sensitive area' designations as set out within the 2017 Regulations¹.

2.2. Planning History

- 2.2.1. The Site's planning history relates to the existing Kop and stadium as a whole.

¹ (Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017)

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The Racecourse Ground

2.2.2. **Table 2.1** below presents the relevant planning applications made relating to the Racecourse Ground (i.e. the wider stadium as opposed to just the application Site). The planning history is limited and includes minor applications over the years.

The Racecourse Ground			
Reference	Description	Decision	Decision Date
P/2012/0275	Erection of 1 no. Fascia Sign	Granted	15/05/2012
P/2012/0718	New signage for club shop	Granted	21/11/2012
P/2012/0717	New entrance doors and accessible ramp for club shop	Granted	22/11/2012
P/2013/0215	Erection of four signs at Glyndwr University Racecourse Stadium	Granted	26/04/2013
P/2022/0515	Prior notification of demolition of buildings (existing Kop)	Granted	24/06/2022
P/2022/0548	Erection of freestanding and stand mounted floodlights (and associated works)	Pending	Pending

Table 2.1: Planning History of The Racecourse Ground

- 2.2.3. In June 2022 WCBC determined that prior approval was not required for the demolition works at the existing Kop which comprised of (but is not limited to) the utility disconnection, tree felling / vegetation removal, asbestos removal, soft stripping, demolition of all structures down to existing floor slab level and the removal of ground floor slabs, foundations and drainage within the building footprint.
- 2.2.4. In June 2022 an application was submitted to WCBC for the “*Erection of Freestanding and Stand Mounted Floodlights (and associated works)*”. The application is for the removal of four existing floodlights and the erection of four new freestanding floodlights, the installation of floodlights mounted on the stands and all associated works. The replacement and new floodlighting caters for the higher lighting requirements for matches at different levels and achieves the lighting levels required for TV broadcasting.

Wider Site

- 2.2.5. In 2006 part of the Racecourse Ground and adjoining land was subject to a redevelopment scheme for the demolition of the existing east stand and existing car showroom to facilitate a mixed use development comprising of private residential apartments, student accommodation units, retail, site for new stand and associated works (Planning ref. P/2006/0443). Further, a reserved matters application pursuant to the outline planning permission above was submitted (Planning ref. P/2007/0125).
- 2.2.6. Adjacent to the Site there were two applications for the erection of 521 / 319 student bedroom development, construction in two blocks, together with access road, parking and development of east stand / multi-function arena which were granted in April 2009 (Planning ref. P/2008/1296/ and P/2008/1295).
- 2.2.7. More recently, two outline planning permissions were submitted. An application was granted for up to 410 residential units with car parking, landscaping, and associated infrastructure (Planning ref. P/2018/0671). Various reserved matters applications have been submitted following the outline approval, with the application reduced to 90 detached and semi-detached homes (P/2021/0094). An outline planning permission was granted for student accommodation facility up to 197 bed spaces, parking, and landscaping (Planning ref. P/2018/0672). An application for Reserved Matters was submitted in June 2022 and is presently under consideration by WCBC (Planning Ref. P/2022/0551).

3. Proposals

3.1. Proposals overview

- 3.1.1. The Kop Development and associated works are necessary to re-instate the current capacity of the stadium from 10,000 to 15,500.
- 3.1.2. Full planning permission is sought for matters comprising:
- Erection of a replacement Kop Stand (including 5,000 general admission seats);
 - 500 seats capacity hospitality area;
 - 600 capacity exhibition space;
 - Relocation of the club shop;
 - Community space on the upper floor of the stand;
 - Offices on the upper floor of the stand;
 - Toilet blocks on the ground floor of the stand;
 - New public realm; and
 - Associated works.
- 3.1.3. The existing stands at the Racecourse Stadium are the Macron Stand, Wrexrent Stand, Wrexham Lager Stand and the Kop.
- 3.1.4. Full planning permission is sought for the Kop Development which will include 5,500 seats for the stadium, inclusive of a 500 capacity hospitality area, with a 600 capacity exhibition space, new public realm and associated works.

3.2. Kop

- 3.2.1. The existing Kop is decommissioned having been last used in 2010. The Kop Development will create a 5,000 capacity general attendance stand designed to current Green Guide requirements (operation and safety). This will provide modern good quality accommodation which will re-introduce the important Kop into the stadium – and once again a dynamic four stand stadium.
- 3.2.2. The Club has seen average attendance increase in recent years and full capacity reached on occasions. The level of demand from spectators means an increased capacity to 15,500 is needed by reintroducing the Kop to help future proof the continued growth in spectator numbers, which sits alongside the ambition of the Club to secure promotion to the Football League.
- 3.2.3. The Racecourse Ground is the oldest international football stadium still in use and the Kop Development will provide the additional capacity and quality of accommodation to facilitate more international games by achieving the UEFA Category 4 requirements.

3.3. Hospitality

- 3.3.1. There are 500 seats in the hospitality area on the upper level of the Kop. This will provide modern facilities to allow the Club to meet the demands from corporate and other supporters. This facility is available on match-day and on non-match days which is an important additional corporate offer in the City.
- 3.3.2. The ground floor concourse of the Kop is key circulation space on match day. This space is flexible for use on non-match days for event / exhibition space which could accommodate up to 600 visitors. The ability to use this large floorspace for activities outside match days is an important part of the City's offer.
- 3.3.3. The ability to deploy the hospitality and exhibition space together on non-match days reinforces the flexibility of space as an asset for the City to accommodate a range of events in a unique and attractive facility (it is clear that such facilities in sports stadia prove popular as included in many new and redeveloped stadium schemes).
- 3.3.4. Whilst not part of the current scheme, the ground floor of the Kop has sufficient height to accommodate an additional floor which could be capable of being used for conference purposes, should proposals emerge for the inclusion of such a facility.
- 3.3.5. The Kop Development includes a relocated Club Shop, enhanced community facilities and Club offices.

4. Pre-Application Consultation

4.1. Pre-Application Consultation (statutory)

- 4.1.1. Pre-Application Consultation (PAC) is a statutory obligation in Wales for major developments, where application documents are made available to the public and consultees to comment on for 28 days prior to the formal submission of the planning application.
- 4.1.2. PAC took place between Friday 1 July to Thursday 28 July 2022. Comments received during this time were reviewed and amendments made to the proposals where appropriate. This is explained fully in the PAC Report submitted as part of the planning application.
- 4.1.3. Over 700 responses were received, with 98% of these being generally supportive. No objections were received from statutory consultees.
- 4.1.4. The following statutory consultees were:
- Councillor Marc Jones – Ward Member for the site, Wrexham County Council;
 - Rhosddu Community Council; and
 - 208 neighbouring properties that share a boundary with the site/ or are close to the site boundary (Mold Road, Maesgwyn Road, Station Approach, Plas Coch Road, Crispin Lane).
- 4.1.5. In addition to the public, the following specialist consultees were:
- Wrexham Environmental & Technical Departments;
 - Welsh Water;
 - CADW;
 - North & Mid Wales Trunk Road Agent (NMWTRA);
 - Natural Resources Wales;
 - The Coal Authority; and
 - Designing Out Crime Officer/ North Wales Police.

4.1.6. The documents submitted as part of PAC were available to view and download at following website: <https://online-consultations.co.uk/wrexhamkopstand/>.

4.1.7. The Planning application is supported by a PAC Report which fully explains the process and the outcomes, as well as summarise the comments received.

4.2. Pre-Application Discussions

4.2.1. The Kop Development proposals have been discussed with key stakeholders, in particular those associated with the Wrexham Gateway – namely Glyndwr University, Welsh Government, Football Association of Wales and Wrexham County Borough Council. The Kop Development forms part of the Wrexham Gateway submission for Levelling Up Funding from the UK Government. The collaboration between the partners has ensured that the Kop Development meets more than the Club's needs, by ensuring it fulfils the UEFA Category 4 requirements to allow International games to be hosted, and the inclusion of space to accommodate exhibitions and future-proof for conference facilities. As well as the design and operation of the Kop Stand, the public realm and emerging masterplan for the surrounding area ensures that further important development, including a potential hotel can be delivered.

4.3. Environmental Impact Assessment Screening

4.3.1. In June 2022, a screening request was made to determine whether the proposals triggered the need for formal Environmental Impact Assessment (EIA).

5. Planning Policy Overview

5.1. National Planning Policy

Future Wales: The National Plan 2040.

- 5.1.1. The Welsh Government formally adopted “Future Wales: The National Plan 2040 (Future Wales)” in August 2019 and has been updated in February 2021. Future Wales outlines the Welsh Government’s strategies for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, delivering growth in the right areas, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities. Future Wales now forms part of the statutory development plan.
- 5.1.2. Future Wales sub-divides Wales into four regions with the application Site located within the North region. A total of 36 policies are contained within Future Wales of which 19 are thematic and the remainder relate to the four regions.
- 5.1.3. The following themes and pertinent policies are discussed below because they may be relevant to the determination of this planning application.

Location and Shape of Growth

- 5.1.4. Policy 1: Where Wales Will Grow identifies a series of National and Regional Growth Areas within which new development is generally to be focussed. One of the National Growth areas is Wrexham and Deeside, which includes the development Site.
- 5.1.5. Policy 2: Shaping Urban Growth and Regeneration states that growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. It then goes on to identify seven key principles for placemaking:
- Creating a rich mix of uses;
 - Providing a variety of housing types and tenures;
 - Building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;
 - Increasing population density, with development built at urban densities that can support public transport and local facilities;
 - Establishing a permeable network of streets, with a hierarchy that informs the nature of development;

- Promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders, and;
- Integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment.

5.1.6. Policy 3 – Supporting Urban Growth and Regeneration – Public Sector Leadership notes that the Welsh Government will play an active role in supporting urban growth and regeneration. The public sector should show leadership and apply placemaking principles to ensure sustainable places.

5.1.7. Policy 12 – Regional Connectivity encourages a modal shift away from the private car by incorporating measures that encourage active travel and the use of public transport.

National Growth Area: Wrexham and Deeside

5.1.8. Policy 20 – National Growth Area – Wrexham and Deeside identifies that the area will be the main focus for growth and investment in the North Region. Wrexham and Deeside will be recognised as areas of focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing and transport infrastructure.

5.2. Development Plan

5.2.1. The development plan relevant to the Site comprises:

- Wrexham Unitary Development Plan 1996-2011 (February 2005); and
- Wrexham Local Development Plan 2 (LDP2) (2013-2028).

5.2.2. The development plan documents are discussed in turn below.

Wrexham Unitary Development Plan 1996-2011 (adopted February 2005)

5.2.3. The existing Development Plan comprises the Wrexham Unitary Development Plan (1996-2011). Whilst the Plan is significantly beyond its plan period it remains in force pending the adoption of a replacement statutory plan. The weight to attach to the Plan is reduced due to its age but there remain relevant policies to the Site.

5.2.4. Policy GDP1 states that all new development within the county should ensure that scale, design and layout accords to the character of the Site, while contributing positively to the nearby locality. Further, the policy notes that proposals should ensure the development of sustainable communities, through promoting the economic, social and environmental well-being of the area.

5.2.5. The Plan is largely silent on proposals for sports stadia and the Racecourse Ground in particular.

Wrexham Local Development Plan 2 (LDP2) (2013-2028)

- 5.2.6. WCBC is in the later stages of preparing the Wrexham Local Development Plan (LDP2) (2013-2028) which, once adopted, will replace the Unitary Development Plan. The LDP2 was submitted to the Welsh Government in November 2018 and progress has been slow with the latest stage being the Matters Arising where consultation ended in July 2022.
- 5.2.7. Emerging Policy CF3 (Regional Sports Stadia) states that the continued use of a number of sports stadia, including the Racecourse Stadium, will be safeguarded. Further, the policy notes that any development which would result in the loss of principal use at the Site will not be permitted. Development proposals which enhance existing facilities at the named stadia, including the Racecourse Ground, will be supported by WCBC. It is clear that the LDP2 therefore supports the continued use and enhancement of the Racecourse Ground.

6. Assessment

6.1. Introduction

- 6.1.1. This section of the Planning Statement assesses the key planning considerations relevant to the Kop Development, taking into account the policy framework, planning history and analysis within the suite of supporting application documents.

6.2. Land Use

- 6.2.1. The Site is identified in the adopted Unitary Development Plan as 'white land' within the Policies Map, meaning it is not allocated for any given use. However, the Site is referenced in the emerging LDP2 as a stadium to be safeguarded and facilities enhanced. This provides a positive planning policy context within which to review the scheme.

6.3. Design

- 6.3.1. A Design and Access Statement (DAS) accompanies the application and sets out full detailed analysis of the Site, its context and design evolution. That document should be referred to for full details and design critique but the following paragraphs offer an explanation of the high quality design arrived at in respect of the new Stand.

Concept and Design

- 6.3.2. The project delivers high-quality, transformational improvements to the Racecourse Ground, creating improved experiences for both supporters and players. The development also delivers much needed additional seating for Wrexham AFC. The application focuses on the existing Kop Stand which will be replaced with a modern high-quality iconic building. The single tier stand will provide 5,000 general admission seats and 500 hospitality seats, as well as the ground floor also providing toilets and concessions. This space can be used as exhibition space on non-match days. Additionally, the upper levels of the Kop Stand will consist of office, community and hospitality spaces (with the top floor providing hospitality lounges for both matchday and non-match day use). A relocated Club shop, community classroom and office space will be located within the stand. Public realm will be provided in front of the new stand, providing gathering space on match and non-match days.
- 6.3.3. As discussed in greater detail within the accompanying DAS, the architectural development of the new Kop has been designed to reflect the mining history in the Wrexham area. Various options were assessed within concept and design development, and the design of the proposals now incorporate a coal element consisting of dark textured form that rises over local red brick plinth.

Kop Stand

- 6.3.4. The design of the new Kop has been developed to include the structural requirements and the need to ensure adequate circulation and safety space within the stadium. The new Kop remains physically

separate to the other stands allowing a high-quality design to be created without compromise. Due to the requirement for 5,500 capacity, the Kop is higher than the existing stands which creates a new focal point within the surrounding area. The form helps alleviate the mass because of the cladding line steeply descending towards the pitch.

Inclusive Access

- 6.3.5. The Kop has been designed to provide access and sufficient user and companion spaces for wheelchair users, in accordance with the Green Guide to Stadium Design. All stands at the Racecourse Ground provide a mixture of wheelchair spaces and the additional incorporation of super risers ensures that wheelchair users have an unobstructed view of the pitch, even if the person in front is standing.
- 6.3.6. Further, the Kop has been designed to ensure elevated accessible viewing platforms at all levels, with pitch side platforms situated at each side of the stand (one metre above pitch level). The platform at level 1 will be accessed via lift.
- 6.3.7. The internal steps and stairs have been designed in accordance with the Guide to Safety at Sports Grounds and comply with requirements for assembly buildings. Toilet accommodation is also in accordance with required standards and provides unisex accessible toilets to visitors at the stand.
- 6.3.8. The DAS provides detailed assessment on matters relating to design, including design rationale and evolution of the proposals. The scale and massing of the proposed development will be achieved while respecting the immediate context.

6.4. Heritage Impact

- 6.4.1. The Site itself has no known heritage assets or historic environment constraints within its red line boundary. Heritage assets have been identified in broad proximity to the Site and are discussed in the following sections. The nearest listed buildings include:
- Plas Coch (part of the University) (Grade II); and
 - Wrexham General Rail Station Entrance Building (Grade II).

Listed buildings

- 6.4.2. As noted above, at a local level, the nearest listed buildings are Plas Coch (part of the University) (Grade II) approximately 500m to the north west and Wrexham General Station (Grade II) approximately 500m to the south.
- 6.4.3. Plas Coch was listed in January 1994. The Site was designated for the following reason:

“The building represents a landmark both in the provision of technical education in Wrexham (the college was built to serve the wider N-Wales region) and in design for education, providing highly functional plan, articulated for a precise use, together with innovative services. It is an excellent,

little-altered example of the architecture of the early 1950's and was considered outstanding at the time."

- 6.4.4. The Entrance Building of the Wrexham General Rail Station was listed in January 1994. The Site was designated for the following reason:

"A good example of GWR station architecture, which, with its fine canopy, survives intact"

- 6.4.5. Section 4.4 of the DAS contains the distance and views from Plas Coch, which shows that the Wrexrent Stand and trees disguise most of the new stand. It is considered that, due to separation distances (which are amplified by topographical changes) the works at the Kop will not harm the architectural significance of the Wrexham General Rail Station Entrance Building and the Plas Coch Building.

Conservation Areas

- 6.4.6. The nearest conservation area is Grosvenor Road Conservation Area, approximately 700m to the south east of the Site.
- 6.4.7. The Grosvenor Road Conservation Area was first designated by WCBC in September 1990, and later amended in July 2007. The Conservation Area is located to the north west of the town centre. Given the distances and topography it is clear that the Kop Development will not impact upon the Conservation Area.
- 6.4.8. In the PAC process, comments were received from CADW which stated that the proposed development will have no impact on the setting of scheduled monument DE286 (Wat's Dyke at Crispin Lane, some 120 metres north of the site).
- 6.4.9. It is clear that there are no heritage related concerns.

6.5. Drainage and Flood Risk.

- 6.5.1. A "Drainage Strategy Report" accompanies the application, which discusses the proposed foul and surface water drainage strategy at the Site. A Flood Risk Statement is also included within the Drainage Strategy Report.
- 6.5.2. The Report concludes that the Site area is at low risk of fluvial flooding, therefore a Flood Risk Assessment is not required.
- 6.5.3. Additionally, the majority of the Site is not shown to be at risk of surface water flooding and the risk of groundwater flooding is considered to be low. The risk of groundwater flooding is considered to be low, and the Site has not experienced historic flooding (according to NRW Flood Map for Planning). The Site is not located in an area at risk of flooding from reservoirs, canals or other artificial sources, summarising that the main risk of flooding at the Site is from extreme rainfall events.
- 6.5.4. The existing drainage at the Racecourse Ground comprises a public sewer which crosses the south west of the site, and existing ground pipework on the existing stand roof. Surface water is collected via

gullies and there appears to be no current positive drainage system to the vegetated earth embankment or existing hardcore areas.

- 6.5.5. Discussed in greater detail within the Drainage Strategy Report, the proposed surface water runoff generated will be managed using a mixture of Sustainable Urban Drainage (SUDs) techniques, including rainwater harvesting, rain gardens, permeable paving and green roofs.
- 6.5.6. Consultation with Welsh Water and WCBC to receive formal approval for the overarching principles of the proposed drainage strategy is to be undertaken.
- 6.5.7. Welsh Water responded during the PAC process and stated that foul flows from the site *"can be accommodated within the public sewerage system"*. No objections were raised.

6.6. Transport

- 6.6.1. A Transport Assessment ("TA") accompanies the application, which includes a Travel Plan ("TP"). The TA considers the policy context, existing transport baseline conditions, match day and non-match day operations, trip generation and an assessment of the impacts of the proposed development on match days and non-match days. The TA considers any proposed measures necessary to mitigate any transport impacts of the Kop Development.
- 6.6.2. The TA demonstrates how the Kop Development will not significantly alter accessibility to the stadium. Vehicular access (including deliveries), on-site parking and access by bicycle will not be changed due to the Kop Development. A new entrance to the Kop is proposed from Crispin Lane and is to be used by pedestrians and delivery vehicles. However, this is not a significant change to access to the stadium by foot. The new proposed entrance off Crispin Lane will also provide alternative desire line for supporters traveling by public transport.
- 6.6.3. It is also discussed within the TA that non-match day operations, such as the provision of additional staff and alternative sporting / non-sporting events, will not significantly impact the traffic generation at the Racecourse Ground. The TA considers the potential impact of the proposed exhibition event on a non-match day.
- 6.6.4. Transport and access issues related to the Kop Development on match days are also considered within the TA. The Kop Development is expected to re-instate capacity to 15,500 (due to the 5,500 uplift in seats) and it is considered that it is the additional capacity that will drive any change in travel demand. It is important to note that the Kop Development is a redevelopment to replace the existing disused facility which would have generated additional movements.
- 6.6.5. The forecast parking demand is also assessed within the TA. There are 38 parking bays, including 2 accessible bays available within the stadium. For over thirty years there has been an agreement with the University to utilise Plas Coch Campus parking during match days. It is expected that this will continue, and the transport consultants have also recommended the availability of car parks within the city (1,615 car parking spaces available within 800m of the Site). It is indicated that the estimated additional supporter parking demand on a weekend match day can be met by the existing capacity within

the city centre car parks. In addition, it is considered that the estimated event parking demand on a weekday non-match day can be met by the existing capacity within the city centre car parks.

- 6.6.6. Measures to affect the way supporters travel to the Racecourse Ground include proposals to strengthen the promotion of non-car modes. The proposed measures are discussed within the supplementary document 'Match Day Access Strategy' and is anticipated to be secured through planning condition. The strategy has an overall aim of reducing the number of cars along Mold Road and Plas Coch through the promotion of walking and public transport for supporters. It is considered that the proposed development should not be required to deliver mitigation works for exhibition events, due to reflecting on the poor estimated performance of the combined junctions, the availability of the exhibition venue to modify scheduling and the fact that these exhibition events will be of less than weekly in occurrence.
- 6.6.7. The TA demonstrates that the proposed development of the Kop Stand should be supported on highways and transport grounds.

Interim Travel Plan

- 6.6.8. An Interim Travel Plan (ITP) has been produced to present the sustainable travel choices to and from the Racecourse Ground. The ITP presents the measures to encourage alternative modes of transport and to discourage single occupancy car journeys.
- 6.6.9. The ITP considers the Travel Surveys recommended to inform the development of meaningful Travel Plan measures and targets.
- 6.6.10. Measures discussed in the ITP include access improvements by foot through the provision of a new access onto Crispin Lane with notice boards presenting travel information being erected, and also the development of "Travel Access Information to the Stadium on the WAFC website", promotion of sustainable access modes and the promotion of walking and cycling. Please refer to the accompanying Interim Travel Plan for an exhaustive list of soft measures and the action plan for the implementation of the ITP.

Match Day Access Strategy

- 6.6.11. A Match Day Access Strategy (MDAS) also accompanies the application. The Match Day Access Strategy presents the proposed strategy (for further consultation with WCBC). Proposed Match Day Access Strategies include the formalised closure of inbound lane on Mold Road pre / and post matches (to be discussed with WCBC), improved communications regarding bus services with supporters and the direction of home and away team coaches amongst other measures.

6.7. Amenity

- 6.7.1. The Site is in a well-established urban environment. The Kop Development will deliver an improvement to the existing Racecourse Ground and provide for much needed increase in capacity and hospitality provision. The Kop Development represents a use which is considered entirely appropriate in this

location and does not alter the existing use of the Site. It is not anticipated that the development at the Site will impact upon the amenity of existing neighbouring properties.

6.8. Noise

- 6.8.1. A Noise Impact Assessment Report accompanies the application. The Report details the potential operational noise impact and levels around the stadium during weekday daytime, evening, and night-time periods, and also before, during and after match day events at the current stadium. This information has been used to benchmark the current noise impact and background noise levels in the surrounding areas. Modelling of the development of the Kop has been undertaken using CadnaA to determine the change in noise impact based on the new stand fabric and profiles.
- 6.8.2. Noise Sensitive Receptors were utilised for assessment and located at Wrexham Village Student Accommodation, The Turf (Pub), houses along Mold Road and Glyndwr University. Noise levels are not anticipated to change at Wrexham Village Student Accommodation. Noise levels may increase at the Turf pub, however the facility is likely to screen the games and provide hospitality therefore the increase in noise levels (medium) is acceptable. Noise levels could increase by 2 dB along Mold Road, which is not a significant change to people with normal hearing. Lastly, noise levels at Glyndwr University are not expected to change as a result of the new Kop Stand.
- 6.8.3. The noise breakout from the hospitality areas within the Kop Stand have been assessed within the Noise Impact Assessment Report. The hospitality facilities will be designed to control noise breakout to the nearest residential premises. Further, the proposed plant decks of the stadium will have specific noise limits set to 5 dB below the measured background levels to ensure there are no tonal or intermittent qualities.
- 6.8.4. The impact of construction noise and vibration has also been considered in the Noise Impact Assessment Report. A threshold above which significant effects may occur has been given on the noise levels from construction occurring within daytime. The Assessment discusses the noise and vibration mitigation in greater detail.
- 6.8.5. Overall, the mode of operation at the stadium during matches is unlikely to significantly change. As a result, the noise impacts during match day activities will approximately be at, or below, the noise levels currently experienced at the nearest sensitive receptors.
- 6.8.6. The proposed hospitality facilities at the ground have been designed to control noise breakouts through the use of appropriate noise limits and façade specifications. Additionally, plant noise limits have been proposed at each of the nearest noise sensitive receptors.

6.9. External Lighting

- 6.9.1. A separate application has been submitted to WCBC for the erection of freestanding and stand mounted floodlights (and associated works) (Planning Ref. P/2022/0548) and is currently under consideration. An External Lighting Strategy was submitted as part of the application documents and considers the light

effects of the proposed floodlighting. The assessment identified areas which could be affected by light pollution, however the areas currently benefit from existing artificial lighting.

6.10. Air Quality

- 6.10.1. An Air Quality Assessment ("AQA") accompanies this application. The AQA considers the impacts associated with the construction of the development, considering the likely changes to air quality in the area as a result of the proposed development.
- 6.10.2. The AQA is prepared in the context of national and local planning policies and guidance.
- 6.10.3. It is considered that the construction of the proposed development has the potential to lead to fugitive dust emissions, in the absence of appropriate mitigation. Considering the assessment undertaken within the AQA and based on the risk of dust impacts and the sensitivity of the Site, it is recommended that mitigation appropriate to a medium risk Site is implemented. These mitigation measures will reduce the effects of dust, therefore the impacts will not be significant.
- 6.10.4. Development traffic is below the threshold for assessment, denoting that this will not have significant impact on air quality.

6.11. Site Waste Management Plan

- 6.11.1. A Site Waste Management Statement (Technical Note) accompanies this application. The statement concludes that a Construction Management Plan and a Site Waste Management Plan (or a Construction Environmental Management Plan) will be required prior to commencement of development.

6.12. Ground Conditions

- 6.12.1. A Geotechnical and Contaminated Land Desk Study Report accompanies this application.
- 6.12.2. The Report identifies that the Site has no potentially significant contaminating land uses within the Site area. There are a number of potentially contaminating land uses within the surrounding area (<250m) including railway uses, various works, garages, petrol stations and a scrap yard. The potential risk from contamination is considered moderate / low. It should also be noted that a higher risk to construction workers could occur during excavations and stockpiling.
- 6.12.3. There is limited geotechnical information to inform foundation design at the preliminary stage. The ground conditions are anticipated to be made ground and the solid geology underlying the superficial deposits is considered to be mudstone.
- 6.12.4. The Report recommends that a ground investigation is undertaken to obtain site-specific ground conditions.

6.13. Ecology

- 6.13.1. A Preliminary Ecological Appraisal accompanies the application. The Appraisal assesses the ecological features present, or potentially present, at the Site and its Zone of Influence (Zoi). The Appraisal collates information based on a desk study, extended Phase 1 Habitat Survey and a Bat Scoping Survey. It is envisaged that following consultation with statutory consultees, appropriate mitigation measures will be agreed and form a part of the application.

7. Conclusion

- 7.1.1. This Planning Statement has been prepared in support of a full planning application on behalf of WAFC, for the Kop Development. The proposals seek full planning permission for the development of the Kop Stand for 5,500 spectator seats, inclusive of a 500-capacity hospitality area, with a 600 capacity exhibition space, new public realm and associated works.
- 7.1.2. The provision of an improved Stand represents significant investment by the Club. The proposals will provide greater capacity for supporters at the Site, while capitalising on a key opportunity for improved hospitality and exhibition space at the Racecourse Ground. The provision of exhibition and hospitality space will provide wider community benefits to the City and its residents.
- 7.1.3. The Kop Development has been carefully designed to ensure that the interfaces between the differing uses on and adjoining the Site are properly considered. The design of the Kop provides a landmark scheme reflecting the area's history.
- 7.1.4. This Statement has summarised the conclusions of the supporting reports and therefore sets out the impacts of the proposals. These reports have set out the numerous benefits of the proposals and policy compliance.
- 7.1.5. This Statement has demonstrated the planning case in support of the proposals in the context of relevant national and local planning policy. It has also identified the significant benefits to both the stadium, the Club and wider community as a result of the proposed development. It is therefore respectfully requested that the proposals are recommended for approval and planning permission granted.