

15 November 2022

Mr Matthew Phillips
Wrexham County Borough Council

By email only

Dear Matthew

P/2022/0668

**Proposed Erection of Storage and Distribution Warehouse (Class B8), Land opposite Wilkinson Business Park,
Clywedog Road South, Wrexham Industrial Estate**

I enclose with this letter the following additional drawings:

- Proposed Site Sections 1200-04-001-P04
- Nutrient Neutrality Statement, prepared by Delta Simons, ref. 87883.545253

This letter addresses the layout and amenity comments received from you in September and provides further information in support of the application on the matter of phosphates.

Layout and amenity

To paraphrase your comments. You seek assurance that the proposed building will not adversely impact on the amenity of residents at Pentre Maelor. This is by reason of the siting and proximity of the building and inter-related issues of potential noise outbreaks from the unit. And thereby to receive assurance that the proposal does not harm the intent of the emerging LDP policy for a buffer zone to protect Pentre Maelor homes.

The updated Proposed Site Sections (Rev 04) provides three additional cross sections B-B to D-D, as well as section A-A which was provided in the original drawing; section A-A being the narrowest point of separation between homes and the proposed building. The range of separation achieved is between 49m to 95m. Comparator separation distances to the approved outline development zone is also provided for information.

Taking a step back the outline permission P/2018/1087 approved a development zone that traced an irregular boundary / buffer. Clearly no building would be designed to trace that line, but the illustrative masterplan did illustrate how two buildings could orientate to the boundary and allowed for the height of any building to be up to a 16.5m ridge line. This proposal for a single building to 15.8m to ridgeline and 14m to parapet, which creates one alignment to the boundary that takes built development further away from homes to the southern portion of the site compared to the outline proposal. This is a material benefit to a number of homes lying parallel to the new building.

Where the new building is closest (section A-A), which is around 5m closer than the outline building position, the nearest homes are oriented at 45° to the new building (illustrated in the Planning Statement, so I will not repeat here).

This means views are cast obliquely and attain greater separation on their line of the site, i.e. 60-70 metres; a considerable distance in terms of mitigating impact on amenity in terms of obtrusiveness.

All views are of course received through a substantial landscape belt which varies in depth and cover along the boundary but is generally at least 20m in depth with substantive understorey growth, with trees reaching approximately 16.5m height as illustrated in the sections. Therefore visually the buildings will be largely screened irrespective of the overall separation distance. And at the point where the tree cover does thin toward the south this is where the proposed building will be sited further away than the outline allows for and the building reduces in scale for the office element, an improvement over the potential outline circumstance.

Drawing the above points together the proposed building does encroach 5m nearer at the closest point but the separation to the nearest property is still a substantial 49m. And separation distances are considerably greater elsewhere than approved in the outline permission or proposed LDP policy. Therefore, though the building does sit inside the proposed LDP buffer zone at its narrowest point, it provides improvement at all other points over the LDP buffer as well as the outline permission.

Noise

We have referred your comments back to Wardell Armstrong, author of the Noise Impact Assessment Report, December 2021 that accompanies the application. Wardell Armstrong provides the following review of its findings and comment in reply to your queries.

Review of the December 2021 Noise Impact Assessment Report

In brief, the noise impact assessment includes the following;

- A review of the existing baseline environment, including noise measurements, and the identification of the surrounding existing noise sensitive receptors.
- The preparation of a computer noise model to demonstrate the noise emissions from the site.
- A noise impact assessment in terms of BS4142, which is the accepted guidance for assessing new industrial noise at existing premises.
- The identification of mitigation measures as required.

The report concludes that

'...noise levels generated by the proposed development are of a low impact, and do not exceed the existing background sound levels at nearby Noise Sensitive Receptors, the development would meet the requirements of WCBC's proposed noise condition. Therefore, noise impact is not a material consideration for the planning application.'

Discussion

It is noted that further confirmation is required that noise from the development will not adversely affect the surrounding receptors. The noise impact assessment is supported by the results of the computer noise model, which includes the assumed noise sources at the proposed development site. All of the equipment, which is included into the computer noise model, and subsequently into the noise impact assessment, is detailed in Table 5 of the December 2021 report.

The computer noise model, and therefore the assessment, includes HGV reversing alarms outside of the building and forklift truck movements within the building, which is expected to be constructed using a portal frame, with insulated cladding. Noise from reversing beepers has therefore been included externally, where any noise from this source has the highest probability of causing the highest impact.

Noise from reversing beepers has not been considered within the building itself. However, any noise from reverse alarms within the building, would be attenuated by the building fabric itself, and therefore the potential impact of any sound produced internally would be less than the external vehicle movements, which are included within the assessment.

If WCBC remain concerned, then the use of white noise reverse alarms could be employed on fork lift trucks used within the warehouse.

Summary

The noise impact assessment, which has been submitted with the planning application, shows that noise levels generated by the proposed development are of a low impact at existing receptors. In addition, the development would meet the requirements of WCBC's proposed noise condition.

Further, noise from reversing alarms has been considered externally, where the impact would be higher than noise from reverse beepers within the proposed building. In any case, white noise reverse alarms could be employed for equipment used internally. Therefore, noise impact is not a material consideration for the planning application.

We trust that the above explanation from WA covers the points of concern. It would be feasible to use a planning condition to require the submission and approval of a 'site management plan' (or similar) to secure relevant noise attenuation measures if considered necessary.

Phosphates

First Investments has commissioned Delta Simons to provide comment on the matter of phosphates, which is provided in the appended Nutrient Neutrality Statement.

The key findings in connection with the standing advice of NRW (July 2022) and WCBC's proposed Phosphate Budget Calculator approach is that the premises are commercial and provide no overnight accommodation and therefore can be considered nutrient neutral.

It is therefore with the council to determine the application on this basis and in line with the standing advice of NRW.

Determination

We are aware that it has taken a period of time to provide a full reply to your comments in September, and to commission reports from Delta Simons on this and other projects in the pipeline at Wrexham Industrial Estate. And it is this pipeline of projects that is of central concern to First Investments to maintain its investment and construction programme. It would be greatly appreciated if a decision can be reached as soon as possible on this application, either as delegated or at planning committee.

Yours sincerely,



Richard Purser, Director

Plan Red Ltd

M: 07938 063301

E: richard@planred.co.uk

Enc.