



Maelor Foods Ltd, Cross Lanes, Wrexham Variation of Condition application - Planning Statement

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1.0 EXECUTIVE SUMMARY

The Need for Expansion

- 1.1 More than 2.2 million chickens are consumed daily in the UK, accounting for nearly 50% of all meat consumption, however, only circa 50% of the supply is UK Red Tractor certified. This translates to an annual poultry and poultry meat production value of £2.8 billion. Investment by UK-based companies is integral to this industry should be welcomed, ensuring traceability from farm to fork and quality control.
- 1.2 The number of poultry processing facilities in the UK is relatively limited and there are even fewer in Wales. Maelor Foods has grown and expanded substantially since 2016, in part with financial support of Welsh Government, and operates to the highest environmental standards.
- 1.3 From their Wolverhampton based facility Maelor Foods' sister company, Salisbury Poultry Limited (SPL), are processing on average 850,000 birds per week. With recent investment in machinery totalling £7 million, SPL now have the capacity to process 1.4 million birds per week.
- 1.4 In line with continued investment, high standards and a market leading reputation, SPL require the supply of a higher number of slaughtered birds. The nature of the industry means that purchasing birds from third party suppliers is near impossible, therefore the proposed increase in processing to 2 million birds per week at Maelor will provide future security, allowing the company to be self-sufficient and continue to have full control and traceability *from farm to fork*.
- 1.5 Following a series of food fraud, animal welfare issues and rising awareness of environmental matters, the British public have widely demanded transparency in supply chains in the meat industry. This has driven the requirements and expectation of the retail industry to improve food standards throughout the supply chain when sourcing their product. In turn, the market is increasingly moving toward locally sourced, ethically and environmentally assured foods. Maelor Foods and SPL's emphasis on quality control has benefitted from this and the substantial increase in demand for UK Red Tractor produce has been a key driver to the growth in the business.

- 1.6 In response to growing market demand in the UK, the current limitation on the number of birds that can be processed at the Wrexham facility is severely restricting the potential for Maelor Foods to respond to rapid changing market demand. As such, this proposal seeks to further increase production at the Maelor Foods site to 2 million birds per week, with the prospect of 125 additional jobs on site and much greater increases in relation to the supporting business infrastructure within North Wales. The proposed new production line and associated on-site plant to ensure compliance with the separate Environmental Permit represents an £18 million investment in the facility itself and the expectation that there will be a £165 million uplift to the wider supply chain. This is further to the original investment of £20 million upon acquisition of the Maelor site for refurbishment works and equipment.

The Expansion Process

- 1.7 The site can accommodate the processing of the proposed increase from 1 million birds to 2 million birds per week, within the existing built footprint and through the simple introduction of an additional production line. No extension works are required to the footprint of the building to facilitate the increased production and just the addition of on-site plant / equipment will be required to ensure compliance with the new Environmental Permit. The additional on-site plant / equipment is specific to the treatment of wastewater generated by the operation and is subject to a separate planning application submitted in conjunction with this S73 application.
- 1.8 The requirement to process an additional 1 million birds per week at the facility has now become a **necessity** for the business in response to substantial consumer demand.
- 1.9 The general operations and approved rigorous management systems at the site will remain the same, and the only operational adjustments will be extensions to existing operations, relating to the additional production line, in hand with the associated movement of vehicles. This application submission is supported by a Transport Assessment which confirms that the increased vehicle movements can be accommodated without detriment to highway safety, subject to the provision of the proposed highway improvements at the Pickhill Lane / A525 junction.

Policy Support

- 1.10 The Mission statement for Food and Drink Wales is to “grow our businesses’ scale, value and productivity”. Within the vision document, it makes clear that “our approach to the food and drink industry has a key role in creating a prosperous and resilient Wales”. These objectives are reinforced by national and local policy that provide overwhelming support for economic growth throughout Wales. This is particularly the case in the Wrexham and Deeside area, which is identified as a main focus for growth as part of the *National Growth Area*.
- 1.11 The proposed development at the Maelor Foods site is fully aligned with the principles of Future Wales by facilitating economic growth in the local area and beyond.
- 1.12 Under the commitment to delivering sustainable development, the proposed development will contribute to each of the key well-being goals. These goals are interdependent and must be realised in mutually supportive ways. The proposed development achieves sustainable development and directly contributes to each of the well-being goals in their own right, in accordance with the Well-being of Future Generations (Wales) Act 2015.
- 1.13 The site is an existing processing facility that has been operational for over 80 years. The Economic Impact Report prepared by Wisher Consulting confirms that considerable economic benefit will be delivered in line with the increase in production, in the form of direct, indirect and induced investment.
- 1.14 The support for economic growth and investment is clear throughout all tiers of Welsh policy, and as is reflected in the Wrexham Borough policy requirements. The proposal to increase production at Maelor constitutes sustainable development and, as is confirmed in this application submission, all relevant social, economic and environmental considerations have been appropriately addressed.
- 1.15 On this basis, the proposed development is compliant with national and local planning policy; relates only to the expansion in operation of an existing facility; will have very limited impact upon local amenity; secures significant local highway improvements; and will make an important contribution to the local economy and associated employment opportunities.

UK Poultry Processing

- 1.16 To our knowledge, the Maelor Foods processing site is the only such site in the UK with such a restriction placed upon the operation of the facility. Whilst it is acknowledged that all applications should be considered on their own merits, it is clear that the proposed level of production at Maelor is consistent with other Poultry processing plants across the country and as such there is nothing exceptional about the scheme. The proposed increase in production will maintain Maelor's position in what is an incredibly competitive industry. In turn, ensuring the competitive function of the site and the continued contribution to Wrexham's economy, with the expansion representing a total GVA uplift of £20 million.

Environmental Permit

- 1.17 An application has been submitted for an updated Environmental Permit in line with this Planning Application. The approved planning permission and environmental permit must complement each other and, in turn, the environmental considerations will be dealt with as part of this highly regulated permitting process. The permit will only be provided on the basis that all environmental impacts are acceptable, as set out in this Statement.
- 1.18 The Environmental Permitting process is focused upon the enhancement of the existing facilities and will reinforce the waste, noise, odour and air quality controls that have been previously approved by Natural Resource Wales and that have been implemented and managed by Maelor Foods. A separate planning application for an expansion to the existing wastewater treatment plant and associated equipment has been submitted to ensure compliance with the projected requirements of the Environmental Permit for operating at 2 million birds per week.

2.0 INTRODUCTION

- 2.1 This Statement is being submitted in support of a S73 application for the variation of three synonymous planning conditions attached to three separate planning permissions at the Maelor Foods site off Pickhill Lane, South of the village of Cross Lanes, Wrexham.
- 2.2 The Application relates to planning permission references **P/2014/0781**, **P/2015/0838** and **P/2017/0165**. The first of these planning consents related to the introduction of the processing facility and the further approved applications were concerned with the improvement and enhancement of the operations at the Maelor site. These applications are referenced in Chapter 4, which summarises the planning history of the site.
- 2.3 In 2017, a S73 application was submitted to vary a condition attached to each of the planning consents, to increase the processing capacity of the facility from 400,000 to 1,000,000 birds per week.
- 2.4 That application proposal was allowed at appeal in March 2019. Condition No. 7 of the Appeal decision, relating to each of the three permissions reads as follows:
- "No more than 1,000,000 birds shall be processed each week at the site subject to this permission."*
- 2.5 The respective appeal references for each of the variations to **P/2014/0781**, **P/2015/0838** and **P/2017/0165** are as follows, **APP/H6955/A/18/3216187**; **APP/H6955/A/18/3216190** and **APP/H6955/A/18/3216188**.
- 2.6 This planning application seeks to vary the condition referenced for the three respective planning permissions, to:
- "No more than 2,000,000 birds shall be processed each week at the site subject to this permission."*
- 2.7 The Statement describes the site and its surroundings, before setting out the planning policy context under which the application should be considered. The planning merits of the proposal are then examined and

the conclusion is reached that there are no material considerations which indicate that planning permission should not be granted.

2.8 This Statement is to be read in conjunction with the complete application pack, which comprises the following:

- Application Form (inclusive of Certificates)
- Location Plan
- Transport Assessment
- Economic Impact Report
- Community Engagement Report

2.9 An Environmental Permit application for the processing of up to 2 million birds is also submitted independently to Natural Resource Wales (NRW). A separate planning application for the further on-site plant/equipment is also submitted to Wrexham Borough Council, to ensure compliance with this permit.

3.0 BACKGROUND TO SITE AND APPLICANT

- 3.1 The applicant, Maelor Foods Ltd. (formerly Maelor Poultry), is a subsidiary company to parent company Salisbury Poultry (Midlands) Limited (SPL), who have been established for 33 years.
- 3.2 The parent company, SPL, was established in 1989 and historically purchased all their raw product from independent slaughterhouses, prior to investing in their own prestigious facility at Maelor. This substantial investment was made to ensure that SPL could secure full control of the humane processing of the highest quality product in a state-of-the-art hygienic environment that is fully traceable from 'farm to fork'.
- 3.3 SPL employ a large number of skilled butchers who perform tasks such as de-boning and portioning. Salisbury supply poultry product into numerous market sectors including ready meal manufacturers, food service, retail, and wholesale and catering.
- 3.4 SPL / Maelor is a family-run business which is successful, progressive, caring and flexible, working with its suppliers to provide total customer satisfaction. Using premium quality 'A' Grade chickens they have gained a market leading reputation for a dynamic and quality focused service that is directed at ensuring their customer needs are always achieved.
- 3.5 SPL operates from 4 modern sites, having grown its turnover from £5 million in 1999 to in excess of £131 million in 2021 with a workforce of over 630 employees. After years of successful growth, the company has built upon its strong values, in the development of an excellent customer base, increased financial stability and an established and knowledgeable workforce.
- 3.6 The company are accredited by a number of organisations, British Red Tractor, BRC, Sai Global and the Food Standards Agency. The company are also TWA approved (Tesco Welfare Approval).
- 3.7 Each of their partners are audited and are also subject to independent and regular audits so that they can ensure animal welfare and food safety.

HISTORY

1989 – THE BEGINNING.

- 3.8 SPL is a privately owned, family-run company that started in Darlaston, West Midlands with 10 employees, supplying both local wholesalers and restaurants. Within a short period the company had grown to 35 employees with a turnover of £5 million.
- 3.9 In 1997, the continued growth led the company to purchase larger premises in Hare Street, Bilston. This new facility was completely refurbished to the highest standards over the next 9 months at a cost of £1.5 million and brought new customers and more employees. That continued commitment and investment has allowed the company to grow and expand exponentially.

2000 – GROWING INTO THE NEW MILLENNIUM

- 3.10 In 2000, the company expanded further and the second site based at Field Street, Bilston, occupying 25,000 ft., was purchased. These premises, which consist of 2 separate facilities, have been utilised to produce thigh meat and facilitate frozen packaging facilities, adding further to the range of products that SPL are able to offer.

2008– FURTHER GROWTH AND ACQUISITION OF PREMISES AT VULCAN ROAD

- 3.11 With continued growth over the coming years, SPL acquired its third site in 2008, at a cost of £1.3 million, sited adjacent to the existing Hare Street facility in Vulcan Road, Bilston. Over the next 18 months this site was refurbished to provide production facilities including a cutting hall, cold stores, holding freezers, chillers, retail packing areas, intake and a distribution centre. In addition, the Company has heavily invested in computer controlled equipment and new technology.

2010 – NEW HQ

- 3.12 SPL moved into their current offices, based in Vulcan Road in 2010, creating an advanced administration centre to serve both new and existing customers more readily.

2014 – INVESTMENT AT HARE STREET

- 3.13 At the start of 2014 the decision was made to close Hare Street, which had been operating since 1989 to allow the refurbishment of the site. The modernisation has been completed and the site has since reopened offering greater production capacity.

2015 – FORMER MAELOR CREAMERY

- 3.14 Newly formed 'Maelor Foods' purchased the former Maelor Creamery site in Wrexham with a view to expanding the SPL business, both operationally and geographically. This commercial decision was part of a long term business strategy that relied upon the expansion of SPL through the supply chain and the integration of the processing of the raw product element as part of the sustained growth of the business.
- 3.15 In 2015, the company secured planning consent for the change of use of the Maelor site to a poultry processing facility (ref: P/2014/0781). A series of further consents were subsequently obtained in the extension of the premises and to secure plant and other material alterations at the facility.

2016 – CONTINUED GROWTH

- 3.16 In 2016 SPL achieved a milestone with turnover of £ 100m and staff numbers exceeding 500.

2017 – MAELOR FOODS

- 3.17 SPL experienced a significant increase in business over the past two years. This has been as a result of significant changes in the national market, the market emphasis on quality control and an increased public purchasing bias in favour of 'buying British'.
- 3.18 The application proposal at the Maelor site has been put forward in response to this rapid increase in demand and to ensure that the need to increase the number of birds being processed at the Maelor site can be secured without delay. This is important to both respond to the requirements of the UK food market and to serve the operational needs of the company from a national perspective.

2019 – MAELOR GROWTH

- 3.19 In 2017, a S73 application was submitted to vary a planning condition for the Maelor site, therefore increasing the processing capacity of the facility from 400,000 to 1 million birds per week. The planning application was allowed at appeal in March 2019.
- 3.20 Subsequently, in July 2019, Maelor was awarded the National Egg & Poultry Awards Winners 2019, an annual event organised by Poultry Business magazine to recognise excellence and innovation in the egg and poultry sectors.
- 3.21 To add to the success of 2019, SPL celebrated its 30th anniversary with a charity ball.

2020 – COVID RESPONSE

- 3.22 Following on from the commercial growth of recent years, with the onset of the COVID-19 pandemic in 2020, SPL / Maelor Foods' priority was to ensure employees and their families kept safe and well, whilst still operating as normal through the pandemic.

2021 – TESCO APPROVED

- 3.23 In May 2021, the company was approved by Tesco to supply poultry product, further growing its retail presence.
- 3.24 In 2021, Maelor's turnover increased by a huge 24%.

2022 – MAELOR'S CONTINUED GROWTH

- 3.25 Today, SPL / Maelor remains a family owned and operated business, with a market leading reputation that facilitates its continually growing demand.

2022 – SPL'S CONTINUED GROWTH

- 3.26 Over the past 3 years SPL have obtained planning permission to extend the factory providing for new delivery bays and new head office building

over 4 floors which provides extra production facilities, new welfare facilities and open plan offices.

- 3.27 The works to the delivery bays and yard at SPL were undertaken at an investment of £ 1.75m and the new head office building at £ 6.4m, with internal fit out being carried out currently.
- 3.28 SPL completed the refurbishment of the new breaded facility at a cost of £4 million. Production orders will commence on 3rd October 2022 and notably the facility will initially create 40 new jobs.

FURTHER GROWTH OPPORTUNITY

- 3.29 The Economic Impact Report prepared by Wisher Consulting outlines the current economic standing of Maelor Foods and their projected market position with the proposed expanded production. Through direct, indirect and induced effects, the expansion in production to 2 million birds per week represents a total GVA uplift of £20 million.
- 3.30 The need for these proposals has come about as a result of the need for the site operator to take their business operation forward and ensure they maintain their position in what is becoming an ever-competitive market place.
- 3.31 Investment in the business to further develop this modern and efficient facility is paramount. That development must be secured at the existing site to ensure commercial continuity and future viability.

4.0 SITE CONTEXT

- 4.1 The site is located South of the village of Cross Lanes off Pickhill Lane, a secondary road off the main A525. The operational site extends to circa. 8.0 ha, which is principally covered with buildings and hardstanding and is also inclusive of the former Lloyd Fraser Haulage site. The site is centred at grid reference 38621, 46710.
- 4.2 The site is located close to Cross Lanes and Bangor on Dee. The site itself is at the Eastern side of Pickhill Lane, Wrexham and falls within the ward of Marchwiel. It is bounded on all sides by agricultural land, with a small number of dwellings opposite the site on the western side of Pickhill Lane.
- 4.3 There are two existing access points on Pickhill Lane and, of these, the main entrance is at the western end of the site. This access includes a security station and weighbridges, which is able to check vehicles in and out of the site and direct them to the appropriate area within the facility. All delivery vehicles use this entrance to enter and exit the site and do not stop at the gate, so as to negate lorry noise in the interests of neighbouring residential amenity.
- 4.4 All entrances and car parks have security gates, which can be closed as required. The northern exit is kept closed and is unused. The site benefits from a separate weighbridge located on the vehicle circulation route within the site itself, which offers the advantage of ensuring there is no potential 'backing-up' of vehicles at the main entrance point.
- 4.5 The site was historically used as a creamery and subsequently gained planning consent for the change of use to a poultry processing facility in 2015.

PLANNING HISTORY

- 4.6 It is important to note that the Maelor site has been in commercial operation since the 1930's. Originally established by Cadburys, the site has seen a number of different operators across a number of commercial sectors, all principally linked to the food/retail industry.

- 4.7 Historically, the site has experienced considerably higher levels of operational development and associated activity, namely very substantial daily vehicle movements to and from the premises and on a local highway network that was substandard in comparison to that experienced today. It should also be noted that additional traffic would have been generated by the neighbouring haulage yard, which is now controlled by Maelor Foods and now operates with the limitation on vehicle numbers identified by the Inspector at Appeal in March 2019.
- 4.8 The site's previous owners obtained planning consent for the 'demolition of existing factory buildings and construction of new cheese cutting and packing plant including offices together with chill storage warehouse' (ref: P/2011/0750) in December 2012.
- 4.9 More recently (and since purchasing the site) planning consent was obtained for the change of use of the site to a poultry processing facility (ref: **P/2014/0781**). The application was approved in March 2015.
- 4.10 Since securing the above consents, the applicant has taken a series of steps to improve the processing facilities at the site, with a view to securing greater levels of efficiency and, most importantly, to limit the potential impact of the business operations on the amenity of local residents. These measures have, most notably, been in respect of the lairage (delivery of live birds) to the facility and in the provision of a significant odour management regime. These works were secured pursuant to planning application references **P/2015/0838** and **P/2017/0165**.
- 4.11 In 2017, a S73 application was submitted to increase the processing capacity of the facility from 400,000 to 1 million birds per week. The application was allowed at appeal in March 2019. In deciding the Appeal and concluding the overall 'Planning Balance' the Inspector defines the key considerations of the scheme as follows:

"I have found in relation to the first 2 main issues that the increased productivity would give rise to harm to highway safety and to the amenities of local residents. However, I have also identified measures that can be secured through planning conditions to partly mitigate or compensate for the harms identified, specifically the road improvements, the ability to control the future use of the secondary access, and the ability to prevent Sunday lorry movements. These benefits are ones that cannot be secured under the controls over the

existing operation. Even so the extent of the harms that I have identified carry significant weight against the appeal proposal.

*In favour of the scheme there are two main considerations. Firstly, is the benefit to the local economy. TAN23: Economic Development requires careful consideration of economic benefits where a development would cause environmental or social harm. On its own I do not find that the economic benefit is sufficient to outweigh the harm that I have identified. **However, without the scheme there is a likelihood that the Lloyd Fraser site would be used intensively as a haulage depot, without controls over matters such as hours of operation and volume of traffic. The traffic flow which this would attract, in addition to the existing flows using the appeal site could result in appreciably more HGV traffic than would result from the appeal scheme. As this would result in potentially greater harm in terms of highway safety and living conditions, it is a matter which must attract significant weight. When taken with the identified economic benefits, it firmly outweighs the harms identified.***

5.0 PROPOSED DEVELOPMENT

- 5.1 Maelor Foods has grown and expanded substantially since 2016, in part with financial support of the Welsh Government, and operates to the highest environmental standards. The future operation and expansion of the Maelor site is a critical part of the SPL operation and will ensure that the business is able to meet increasing customer demands whilst maintaining its high accredited standards.
- 5.2 The facility at Maelor is able to accommodate an enhanced production within the existing built footprint. The expansion of the facility to accommodate the processing of up to 2 million birds per week, relies upon the simple introduction of an additional production line. No extension works are required to facilitate the increased production and just the addition of on-site plant / equipment will be required to ensure compliance with the new Environmental Permit. The footprint of Maelor's premises will not change, but there will be some growth in associated transport movements.
- 5.3 The requirement to process an additional 1 million birds per week at the facility has now become a necessity for the business in response to substantial consumer demand.
- 5.4 As a consequence, SPL / Maelor need to adjust the current limitation on the processing of 1 million birds per week, up to 2 million birds each week. It is proposed that this adjustment is secured by the variation of the relevant planning condition.
- 5.5 The general operations and approved management systems relating to the site will remain the same, aside from the introduction of an additional production line and the associated increase in vehicle numbers. This application submission is supported by a Transport Assessment which confirms that the increased vehicle movements can be accommodated at the site without detriment to local highway safety and, subject to, the proposed highway improvements at the Pickhill Lane / A525 junction.
- 5.6 The operation at the Maelor site ensures that the principle of a poultry processing facility within this part of Wrexham is now well established. That position has been further reinforced by the subsequent planning consents for a series of measures in extension, enhancement and

improvement of the facilities to support the continued growth of the company. In this established context, the key factor in determination of this planning application is whether the operational use of the site will cause any unacceptable harm to the amenity of local residents or users of the local highway network.

- 5.7 The acceptability of any potential impact requires an understanding of the policy position in favour of the application proposal (together with any other relevant material considerations) and the balanced assessment of any identified harm in determination of the proposed variation of the planning condition. This statement and the supporting application submissions seek to address this planning balance.
- 5.8 The absence of any physical extension of the premises ensures that all matters of visual impact, ecology, flood risk, foul and surface water drainage are not material to the determination of this application proposal. In these terms, this S73 application is concerned only with highway impact and residential amenity, which are addressed through the effective mitigation measures as set out in this statement and the accompanying application documentation. These measures include the junction improvement works at the Pickhill Lane/A525 junction that represent a substantial investment by Maelor in the region of £400,000 and will significantly improve local highway safety.
- 5.9 The relevant environmental considerations relating to the operational expansion of the facility at the Maelor site are dealt with as part of the standalone Environmental Permit application. That being said, all of these matters can be satisfactorily addressed through defined management measures / additional on-site plant and equipment, which is subject to a separate planning application.
- 5.10 The permitting process is principally concerned with potential issues of noise, odour, water pollution, site contamination and air quality. Again, these are matters that are substantially confined for permitting purposes by the terms of the proposed expansion within the existing built footprint.

6.0 LEGISLATIVE CONTEXT

WELL-BEING OF FUTURE GENERATIONS (WALES) ACT 2015

- 6.1 The Well-being of Future Generations (Wales) Act 2015 came into force in April 2016.
- 6.2 The Act sets out “seven well-being goals”, placing a duty on the Welsh Ministers and other specified public bodies, to take reasonable steps to meet the objectives in the context of “sustainable development”.
- 6.3 The Act is legally-binding and details the ways in which these bodies must work together, to improve the well-being of Wales. The Act sets the path for Wales to make its contribution to the achievement of the 17 United Nations Sustainable Development Goals.
- 6.4 The seven well-being goals are put in place to ensure we are all working towards the same purpose, these are as follows:
- A Prosperous Wales
 - A Resilient Wales
 - A More Equal Wales
 - A Healthier Wales
 - A Wales of Cohesive Communities
 - A Wales of Vibrant Culture & Thriving Welsh Language
 - A Globally Responsible Wales
- 6.5 Planning Policy Wales addresses each of the seven well-being goals in further detail, setting out how planning and development should work toward achieving these objectives. The most pertinent of these goals to the application are set out below.
- 6.6 **A Prosperous Wales** - An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an “economy which generates wealth and provides employment opportunities”, allowing people to take advantage of the wealth generated through securing decent work.

- 6.7 **A Globally Responsible Wales** - A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

6.8 ***Commentary***

The application proposal is consistent with the commitment to delivering sustainable development and provides the opportunity to make a significant contribution to each of the well-being goals. These goals are interdependent and must be realised in mutually supportive ways. The application proposal supports a sustainable form of development and contributes to each of the well-being goals in their own right, in accordance with the Well-being of Future Generations (Wales) Act 2015.

7.0 NATIONAL POLICY CONTEXT

FUTURE WALES: THE NATIONAL PLAN TO 2040

- 7.1 Future Wales is a 20-year framework for planning the change and development of Wales to 2040, with a strategy for addressing key national priorities through the planning system. These priorities include: sustaining and developing a **vibrant economy**; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities.
- 7.2 The Welsh Government recognises and supports the important role of businesses of all sizes, from major international manufacturers to micro businesses, in strengthening, diversifying and increasing the resilience of our economy.
- 7.3 Future Wales sets out 11 ambitions/outcomes, supported by 36 specific policies.
- 7.4 **Outcome 2** sets out the priority to support job opportunities in rural areas, to help attract and retain people.
- 7.5 **Outcome 6** sets out that Development plans will have a forward thinking, positive attitude towards enabling economic development, investment and innovation.
- 7.6 **Outcome 9** states the priority for places to sustainably manage their natural resources and reduce pollution, highlighting that Wales' natural resources, including its minerals, soils and geodiversity, coast, water, forests and landscape support a range of activities and sectors and are assets of great value in their own right.
- 7.7 **Policy 1 – “Where Wales will grow”** identifies three National Growth Areas where there will be growth in employment and housing. Wrexham and Deeside are identified as part of this National Growth Area.

“Each of these urban areas is economically distinctive, supporting a range of businesses, enterprises and universities, and offering culturally rich lifestyles to residents and visitors. They are internationally and nationally significant places and this strategy promotes their continued growth and regeneration.”

7.8 **Policy 5 – Supporting the rural economy** sets out how the Welsh Government supports sustainable, appropriate and proportionate rural economic growth.

7.9 **Policy 20 – National Growth Area – Wrexham and Deeside** sets out that Wrexham and Deeside will be the “main focus for growth and investment in the North region”. The policy highlights that the Wrexham and Deeside area is the region’s main centre of population, employment and services and is served by the “main connectivity infrastructure”. Accordingly, strategic and local development plans must recognise the National Growth Area as the “focus for strategic economic growth, essential facilities and advanced manufacturing”.

7.10 ***Commentary***

The key policy objectives of Future Wales seeks to encourage economic growth in local areas and beyond. This is particularly the case in the Wrexham and Deeside area, which is identified as a main focus for growth as part of the National Growth Area. On this basis, the proposed development supports the principles of Future Wales by encouraging economic growth in the local area and beyond.

NATIONAL PLANNING POLICY

- 7.11 The Welsh Assembly Government's (WAG) land use planning policies are set out in Planning Policy Wales (PPW), plus Technical Advice Notes, Circulars and Ministerial Interim Planning Policy Statements.

The need to achieve sustainable development is at the heart of the aims of the policy guidance and the four broad objectives are:

- Social progress that recognises the needs of everyone;
- Maintaining high and stable levels of economic growth and employment;
- Effective protection of the environment; and
- Prudent use of natural resources.

PLANNING POLICY WALES (EDITION 11, FEB'21)

- 7.12 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015.
- 7.13 Planning Policy Wales addresses each of the seven well-being goals of the Well-being of Future Generations (Wales) Act 2015, setting out how planning and development should work toward achieving these objectives.
- 7.14 Figure 7 of PPW sets out how proposals should be prepared within the context of key planning principles of the planning system, this is included below (Fig 1).

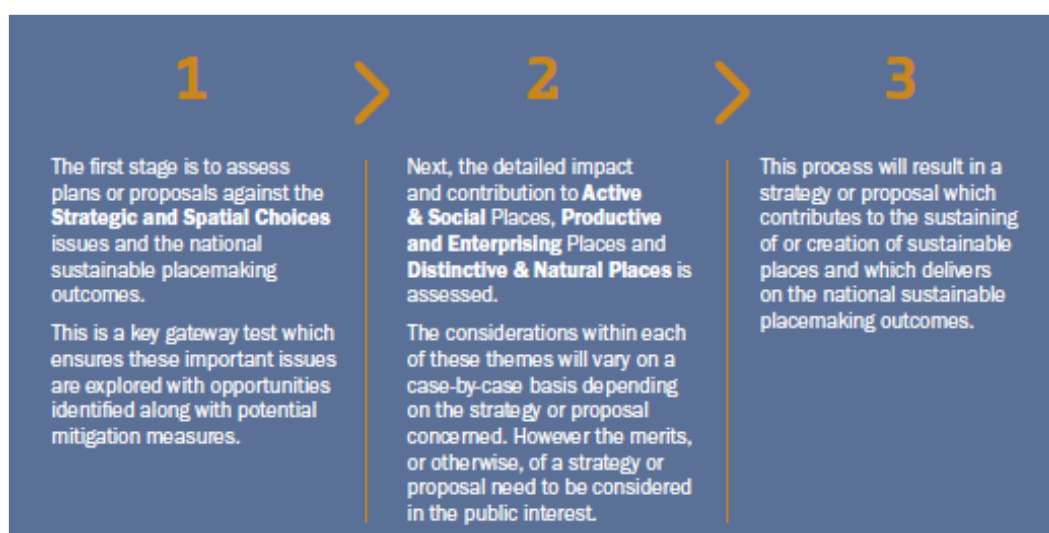


Fig. 1 PPW Extract

- 7.40 PPW states that the planning system should not be used to secure objectives which are more appropriately achieved under other legislation. The aim should be to maintain the principle of non-duplication, wherever possible, even where powers and duties resulting from other legislation may also be the concern of local authorities. This does not mean failing to address issues which the planning system should be properly concerned with.

7.15 **Commentary**

The potential environmental impacts of the proposed development will be dealt with in detail through the 'Environmental Permit' process, as set out in Chapter 12. This Statement concludes that no unacceptable harm will be caused as a result of the proposed development and, in particular, with respect to residential amenity, safety and wider environmental considerations.

CHAPTER 2 – PEOPLE AND PLACES: ACHIEVING WELL-BEING THROUGH PLACEMAKING

7.16 PPW states that Sustainable Places are the goal of the land use planning system in Wales; they are the output of the planning system rather than the process of achieving them. All development decisions, either through development plans policy choices or individual development management decisions should seek to contribute towards the making of sustainable places and improved well-being.

7.17 Sustainable development is built from social considerations, economic considerations; cultural considerations and environmental considerations. In achieving truly sustainable development, each of these objectives need to be considered in mutually supportive ways.

7.18 **Commentary**

The site is an existing operational facility which has been operational for over 80 years. The Economic Impact Report prepared by Wisser Consulting confirms that considerable economic benefit will be delivered in line with the increase in production, in the form of direct, indirect and induced impacts. This Statement, in conjunction with the accompanying reports, confirms that the application proposal will secure sustainable development and that all relevant social, economic and environmental considerations are supported by the proposal.

GROWING OUR ECONOMY IN A SUSTAINABLE MANNER

7.19 The planning system should enable development which contributes to long term economic well-being, making the best use of existing

infrastructure and planning for new supporting infrastructure and services. Communities, national and local government, businesses, and the third sector must work together to take a long term view, integrating and aligning priorities through greater collaboration to achieve sustainable economic benefits for all in line with the well-being goals.

7.20 **Commentary**

The site is an existing operational facility which has been operational for over 80 years. This Statement, in conjunction with the accompanying reports, concludes that the proposals, to increase production from 1 million birds to 2 million birds per week, would contribute significantly to the local economy, providing an uplift of 50% on current employment levels. This economic enhancement is achievable, whilst suitably addressing environmental and social considerations.

The expansion of the existing facilities output makes best use of existing infrastructure, in conjunction with additional highway improvements at the Pickhill Lane / A525 junction. These works are proposed to ensure the highest level of highway safety within the surrounding area.

CHAPTER 3 – STRATEGIC AND SPATIAL CHOICES

STRATEGIC PLACEMAKING

- 7.21 Preference for the re-use of land - previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, where it is suitable for development.
- 7.22 In developing their spatial strategy planning authorities must prioritise the use of suitable and sustainable previously developed land and/or underutilised sites for all types of development.

7.23 **Commentary**

The site represents the epitome of previously developed land with limited constraints with regard to commercial development. Alternative uses for the site are very limited in light of planning policy.

The existing operator has invested heavily in the facility, currently standing at c. £20 million, which in turn has been a major boost for the local economy and employment market. This investment must be supported to maintain the facility for current and future generations, in turn supporting the fundamental principles of sustainable development.

ENVIRONMENTAL SUSTAINABILITY

- 7.24 With respect to ensuring environmental sustainability, PPW states that development should seek to minimise the use of non-renewable resources and prevent the generation of waste and pollution.

7.25 **Commentary**

The site is an existing commercial site and has been for over 80 years. This Statement, in conjunction with the Environmental Permit application, concludes all relevant environmental considerations have been addressed and no unacceptable impacts will result from the proposed increased production.

COMMUNITY SAFETY

- 7.26 With regard to community safety, the aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' well-being goal.

7.27 **Commentary**

The plans to increase production at the site are proposed in conjunction with highway improvement works at the Pickhill Lane / Cross Lanes junction, which will facilitate improved highway safety in the interests of wider community safety.

CHAPTER 4 – ACTIVE AND SOCIAL PLACES

- 7.28 PPW sets out that Active and Social Places promote our social, economic, environmental and cultural well-being by providing well-connected cohesive communities.
- 7.29 “A Prosperous Wales can be promoted through the development of modern and connected infrastructure to allow everybody to have a good quality of life by living in strong and safe communities, with access to decent jobs”. Transport Assessments are an important mechanism for setting out the scale of anticipated impacts a proposed development, or redevelopment, is likely to have. They assist in helping to anticipate the impacts of development so that they can be understood and catered for appropriately.
- 7.30 **Commentary**

As raised in the previous section, the economic benefits of permitting this increase to production is paramount to consideration of this application. This is not only applicable to the commercial viability of the site specifically but also the wider economy and the benefits that will be gained for the wider community, associated with an uplift in employment opportunities and thus local spend. This is explained in more detail in the Economic Impact Report which accompanies this application, and in Chapter 10 of this Statement.

The only matter that would be impacted through the increase in processing at the site would be transport, i.e. vehicle movements to and from the facility on a daily basis. This is assessed in detail in the accompanying Transport Assessment to this planning application.

As set out above, the accompanying Transport Assessment provides context and clarification to the ‘post-development’ position. The associated proposed highway improvement works are a response to this position and, represent a significant investment, concluding that there will be no unacceptable highway impacts.

CHAPTER 5 – PRODUCTIVE AND ENTERPRISING PLACES

ECONOMIC INFRASTRUCTURE

- 7.31 Productive and Enterprising Places are those which promote our economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development.
- 7.32 The Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim.

With regard to economic development, planning authorities should aim to:

- co-ordinate development with all forms of infrastructure provision such as transport and utilities;
- **support national, regional, and local economic policies and strategies;**
- **align jobs and services with housing and sustainable transport infrastructure,** to reduce the need for travel, and dependency on travel by car;
- **promote the re-use of previously developed, vacant and underused land;**
- deliver physical regeneration and employment opportunities to disadvantaged communities;
- control and manage the release of unwanted employment sites to other uses;
- propose specific locations for locally and strategically important industries which are detrimental to amenity and may be a source of pollution; and
- identify protection zones around land and premises that hold hazardous substances and protect the ability of existing businesses to operate or expand by preventing the incremental development of vulnerable uses in the locality. (our use of bold)

7.33 *Commentary*

The economic benefits of increasing the production at Maelor are a key policy driver of the application proposal. This is not

only applicable to the commercial viability of the site specifically and the operational requirements of the business, but also the wider economy and the benefits that will be gained with the more comprehensive operation at the facility.

Supporting this variation of condition application will ensure that the site operator will not be unnecessarily restricted and will therefore be able to deliver upon demand and maximise their competitiveness.

The economic advantages associated with the increased processing capacity at the Maelor site are not specific to the site and the operator of the site, they extend to the wider supply chain and other related businesses. This is in the form of direct, indirect and induced effects and is set out in more detail in the attached Economic Impact Report prepared by Wisher Consulting.

CHAPTER 6 – DISTINCTIVE AND NATURAL PLACES

RECOGNISING THE ENVIRONMENTAL QUALITY OF PLACES

DEVELOPMENT AND FLOOD RISK

7.34 In determining applications for development, local planning authorities should work closely with Natural Resource Wales, drainage bodies, sewerage undertakers, prospective developers and other relevant authorities to ensure that surface water run-off is controlled as near to the source as possible by the use of sustainable urban drainage systems. They should also ensure that development does not:

- Increase the risk of flooding elsewhere by loss of flood storage or flood flow route; or
- Increase the problem of surface water run-off.

- 7.35 Clean air and an appropriate soundscape, contribute to a positive experience of place as well as being necessary for public health, amenity and well-being.

7.36 **Commentary**

The application proposal is accommodated within the existing built footprint of the site and the new production line will be accommodated by the existing management systems, with additional capacity in the form of on-site plant. Natural Resource Wales have been a consultee to these applications and have supported the proposals.

A Noise Impact Assessment and Odour Impact Assessment have been undertaken for the site to inform the Environmental Permit application, which confirms that no unacceptable impacts will be made as a result of the proposed increase to production.

These considerations will be dealt with by NRW as part of this Environmental Permitting process.

TECHNICAL ADVICE NOTES

7.37 Alongside PPW sit 24 Technical Advice Notes (TANs).

7.38 Technical advice notes (TANs) provide detailed planning advice. Local planning authorities take them into account when they are preparing development plans. Of those available, the most pertinent to the proposal are as follows:

Technical Advice Note 11 – Noise

Technical Advice Note 18 – Transport

Technical Advice Note 21 – Waste

Technical Advice Note 23 – Economic Development

TAN 23 – ECONOMIC DEVELOPMENT

7.39 Planning Policy Wales (PPW) defines economic development broadly so that it can include any form of development that generates **wealth, jobs and income**. In producing development plans or determining planning applications local planning authorities need to bear in mind that traditional business use, classes B1-B8, only account for part of the activity in the economy. It is important that the planning system recognises the economic aspects of all development and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations.

7.40 In the full context of PPW, therefore:

- Economic development is development (new or change of use) where the resulting space will be occupied by economic activities;
- An economic activity, or economic land use, is an activity which directly generates wealth (output), jobs and income;
- Generating jobs includes providing or sustaining existing jobs as well as creating new jobs.

PLANNING FOR ECONOMIC DEVELOPMENT

7.41 It should not be assumed that economic objectives are necessarily in conflict with social and environmental objectives. Often these different dimensions point in the same direction. Planning should positively and imaginatively seek such 'win-win' outcomes, where development contributes to all dimensions of sustainability.

7.42 **Commentary**

The site is an existing operational facility which has been operational for over 80 years. This Statement, in conjunction with the accompanying reports, concludes that the economic benefits of increasing production from 1 million birds to 2 million birds per week would provide an uplift of 50% on current employment levels, representing an overall GVA uplift of £20 million.

SUMMARY - NATIONAL PLANNING POLICY

- 7.43 Future Wales defines national priorities through various objectives, 'outcomes' and policies. There is clear support for economic growth and employment development, notably within the identified 'National Growth Areas', to which Wrexham is a part of. These areas are acknowledged for their significance and further growth is encouraged in light of opportunities for contribution to the wider Welsh economy.
- 7.44 PPW provides further detailed commentary in succeeding the national priorities of both Future Wales and the Well-being of Future Generations Act 2015, Well-being Goals. There is a presumption in favour of growing the Welsh economy and achieving sustainable development principles, ensuring social, economic, cultural and environmental considerations are seen in mutually supportive ways. PPW defines the importance of suitably accommodating all other material considerations in achieving sustainable development, i.e. environmental sustainability, infrastructure capabilities and flood risk.
- 7.45 The proposed increase in processing at Maelor to 2 million birds per week is consistent with all tiers of National Planning Policy, representing a considerable opportunity for economic growth, whilst protecting residential amenity and all other material considerations. This sustainable development at Maelor is to be achieved through mitigation measures, notably the junction improvement works at Pickhill Lane / A525, whilst ensuring all environmental considerations are dealt with effectively through the separate Environmental Permit process, overseen by NRW.

8.0 WIDER POLICY CONSIDERATIONS

PROSPERITY FOR ALL: ECONOMIC ACTION PLAN

- 8.1 The Welsh Government 'Prosperity for All: Economic Action Plan' identifies the national strategy for Wales. It sets out a vision for inclusive growth based on strong foundations, future industries and productive regions.
- 8.2 The plan states:
- "In pursuing prosperity for all, we intend building an economy on strong foundations, to supercharge our industries of the future and empower all our regions to become more productive."*
- 8.3 The plan identifies that the connection between the foundation sectors and quality of place has important economic impacts, which must be better exploited. This includes the impact of food production and processing on the Wales brand.
- 8.4 "Prosperity for all" is identified by reference to five priority areas, one of which is 'Skills and Employability'. On the basis of this priority, the plan supports "connecting people and jobs by supporting local economies".
- 8.5 The plan sets out 'Foundation Sectors', stating that the foundation economy provides essential goods and services. The plan confirms the intention to "work to support four foundation sectors" – tourism, food, retail and care – in a joined-up and consistent way across government. The plan further confirms that the Government will work with "the sectors to understand the challenges they face and the opportunities for growth and innovation".
- 8.6 The plan makes clear that the foundation economy provides essential goods and services and is the backbone of our local communities across Wales. The plan further states, with reference to tourism and food aspect of the foundation economy that the Welsh Government will work directly with individual businesses on issues as diverse as marketing, skills, facilities, delivering major events and product quality.

- 8.7 Another of the five priority areas identified is 'Build Ambition and encourage learning for life'. The principle being that the Government intends to "develop a workforce and businesses with an improved capacity for long-term planning and investment".

8.8 **Commentary:**

Prosperity for all is the key guiding principal of the economic growth strategy for Wales. There is, in turn, a general presumption in favour of employment provision and the growth of food production as a foundation sector and as "the backbone of our local communities across Wales".

FOOD AND DRINK WALES – A VISION FOR THE FOOD AND DRINK INDUSTRY FROM 2021

- 8.9 The Welsh Government sector support agency 'Food and Drink Wales' produced a sector development plan, 'A Vision for the Food & Drink Industry from 2021. Building on Our Success'.
- 8.10 The vision being to create a strong and vibrant Welsh food and drink sector with a global reputation for excellence, having one of the most environmentally and socially responsible supply chains in the world.
- 8.11 The vision acknowledges the Well-being of Future Generations (Wales) Act as a pioneering piece of Welsh legislation that drives us to improve our social, cultural, environmental and economic well-being.
- 8.12 The strategy document acknowledges that "the food and drink industry has a vital role to play in the evolution of the Welsh economy and there is a strong desire to maintain this momentum".
- 8.13 The Mission statement for Food and Drink Wales is to "grow our businesses' scale, value and productivity".
- 8.14 Within the vision document, Food and Drink Wales' states that "our approach to the food and drink industry has a key role in creating a prosperous and resilient Wales".

SUMMARY – WIDER POLICY CONSIDERATIONS

- 8.15 As set out above, the wider relevant policy considerations provide clear commentary and support for growing businesses and their productivity. That policy context acknowledges the importance of manufacturing and the wider food economy in contributing to the foundation economy of Wales, as the backbone of many rural communities. The proposed increase to production at Maelor is wholly aligned with the intention and purpose of the above policy considerations: growing the business, its employment contribution, its role in the food sector and in supporting the wider economy in Wales.

9.0 LOCAL PLANNING POLICY CONTEXT

RELEVANT PLANS AND POLICIES

- 9.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 9.2 Local planning authorities in Wales are required to prepare development plans and these should contain the policy of the Welsh Assembly Government. Development Plans provide certainty and consistency for decisions about developments and determination of planning applications.
- 9.3 The Planning and Compulsory Purchase Act 2004 requires that local planning authorities move away from the old style plans known as 'Unitary Development Plans' (UDPs) and replace them with new 'Local Development Plans' (LDPs). Policy on the LDPs is published in Local Development Plans Wales (LDPW) and practical guidance in the Local Development Plan Manual.
- 9.4 The statutory development plan for the application site currently consists of the saved policies of the Wrexham Unitary Development Plan 1996-2011 (adopted February 2005).
- 9.5 The emerging Wrexham Deposit Local Development Plan 2013-2028 is also a material consideration. The Deposit Local Development Plan 2013-2028 was submitted to the Welsh Government for examination in April 2018. Although the plan is still under examination of the Inspectors, it is at a particularly advanced stage of preparation. Once the plan is adopted, the LDP will replace the Unitary Development Plan (1996-2011) and form the basis for decisions on land use planning for the County Borough of Wrexham.

WREXHAM UNITARY DEVELOPMENT PLAN (2005)

- 9.6 The existing adopted policy document for Wrexham County Borough is the Wrexham Unitary Development Plan. The Unitary Development Plan (UDP) 1996 - 2011 was adopted by Wrexham County Borough Council on the 14th February 2005. The Plan covers the administrative area of the Wrexham County Borough Council. It supersedes previous adopted development plans, namely the Wrexham Maelor Local Plan: Forward to 2001, the Glyndwr District Local Plan, and the Clwyd Structure Plan: First Alteration.

SOCIAL, ECONOMIC AND ENVIRONMENTAL CONCERNS

- 9.7 The following policies are considered of material consideration to this application:

- 9.8 **Policy GDP1** requires that all new development should:-

a) Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.

b) Take account of personal and community safety and security in the design and layout of development and public / private spaces.

c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources.

d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.

e) Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible.

f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.

g) Secure public services (e.g. gas, water, electricity) to development at minimum public cost.

h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.

i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site.

j) Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity from development that could harm this identity.

k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area. (our bold)

9.9 **Policy EC12** states that development (including the raising of land) within defined flood plains will only be permitted if it:-

a) would not be subject to an unacceptable risk of flooding on-site; and/or

b) does not result in an unacceptable risk of flooding on or off-site; and/or

c) does not adversely affect flood management or maintenance schemes.

9.10 **Policy PS2** requires that development must not materially detrimentally affect landscape/townscape character, open space or the quality of the natural environment.

9.11 **Policy PS3** states development should use **previously developed land** comprising vacant, derelict or underused land in preference to the use of Greenfield land, wherever possible. (our use of bold)

9.12 **Policy PS4** states development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car.

9.13 **Policy T8** states that development granted planning permission will be required to provide vehicle parking spaces either on site or nearby, in accordance with the Council's current parking standards. Special regard will be paid to the following factors, as appropriate:

- The availability of public interest of public transport nearby;
- Proximity to public car parking;
- Proximity to local services and facilities; and
- Road safety hazards and amenity considerations arising from on street parking in the vicinity of the site.

9.14 Where implementation difficulties arise in making parking provision on site or nearby, the Council will require a developer to make financial contributions for measures to assist public transport, or walking and cycling as appropriate.

9.15 **Commentary**

The support for economic growth and investment is clear throughout all tiers of policy, and this extends to the provisions of the Wrexham Borough Plan. On these terms, the proposed development represents an expansion of an existing facility, which will make a significant contribution to the local economy through direct, indirect and induced investment. This is further evidenced in the Economic Impact Report prepared by Wisser Consulting.

WREXHAM LOCAL DEVELOPMENT PLAN 2013 - 2028

- 9.16 The emerging Wrexham Deposit Local Development Plan 2013-2028 is also a material consideration. The Deposit Local Development Plan 2013-2028 was submitted to the Welsh Government for examination in April 2018. Although the plan is under examination of the Inspectors, it is at a particularly advanced stage of preparation. Once the plan is adopted, the LDP will replace the Unitary Development Plan (1996-2011) and form the basis for decisions on land use planning for the County Borough of Wrexham.
- 9.17 Wrexham County Borough Council is preparing the Local Development Plan (LDP2), which will replace the current adopted Unitary Development Plan. The LDP will be a long-term land use and development strategy focused on achieving sustainable development and will:
- guide development for housing, employment, retail and other uses;
 - set out policies that will be used to decide planning applications; and
 - safeguard areas of land requiring protection or enhancement.

SOCIAL, ECONOMIC AND ENVIRONMENTAL CONCERNS

- 9.18 The following policies are considered of material consideration to this application:
- 9.19 **Policy SP6** states that planning obligations – inclusive of Highway improvements - will be sought to mitigate any impacts directly related to the development and will be assessed on a case by case basis.
- 9.20 **Policy SP12** highlights the transport and accessibility agenda of the plan, ensuring that development does not have an unacceptable impact on the safe, efficient and sustainable operation of Wrexham's transport network.
- 9.21 **Policy SP15** states that development will only be supported where it protects, conserves and enhances the natural environment.

- 9.22 **Policy SP9** states the economic growth priority for the Borough, stating the Plan will diversify the local economy and widen the economic base by:

“... seeking to safeguard existing national, regional and locally important industrial sites essential to meeting the future economic growth of the County, which ensures a range and choice of sites co-located with housing in both urban and rural settlements;

Providing a level of growth which allows opportunities to deliver approximately 4,200 jobs in the County Borough over the Plan period across a wide range of employment sectors”

- 9.23 **Policy DM1** states that developments proposals, where relevant, must:

a) Accord with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/ townscape in terms of its siting, layout, scale, height, design, density, use of materials and landscaping;

b) Not have an unacceptable effect on the amenity of the occupiers of nearby properties/land by virtue of noise, disturbance and overlooking; and provides a satisfactory standard of amenity for the occupiers/users of the development itself;

c) Safeguard the environment from the adverse effects of pollution of water, land, light or air, or land instability, arising from development;

d) Take account of personal and community safety and security in its design and layout

e) Be safely and conveniently accessible for all potential users/occupiers of the development on foot, bicycle, by public transport and by car;

f) Not give rise to parking or highway safety problems on site or in the locality;

- g) Maximise sustainable travel choices first and then provides for car related needs;
- h) Contribute to low carbon communities through energy efficiency, be designed to minimise the use of non-renewable energy, water and the production of waste both during construction and when in use;
- i) Not increase the risk of flooding but makes adequate provision for sustainably dealing with foul and surface water drainage and not result in an unacceptable impact upon the water environment;
- j) Consider the needs of a diverse population including those with protected characteristics such as age or disability;
- k) On sites which have previously been developed, new development proposals should make use of existing suitable building materials wherever possible for appropriate uses in order to re-use recyclable materials and reduce the amount of imported materials; and
- l) Ensure that any risks arising from past coal mining, as indicated on the proposals map, can be adequately managed.

9.24 **Policy T1** states that development proposals will be supported where they:

"... Mitigate any significant adverse effects upon the transport network that arise from the proposed development including improvements to transport infrastructure where required;

Do not compromise the safe, effective and efficient use of the highway network and do not have an adverse impact on highway safety or create unacceptable levels of traffic generation;"

9.25 **Policy NE6:** Waste Water Treatment and River Water Quality states:

"Development will only be supported where there is no adverse impact on the integrity of the River Dee and Bala Lake SAC and its conservation objectives, in particular through the treatment of wastewater.

Developments should in the first instance seek to connect to the existing mains wastewater infrastructure network. Where this would result in nutrient levels exceeding conservation objectives targets within the SAC, then proposals will need to fully mitigate the adverse effects caused by the proposed development. This may involve;

- Incorporating measures to achieve water efficiency and/or a reduction in surface water discharge to the main sewer network, minimising the capacity required to accommodate the proposal;
- Phasing or delaying development until further capacity is available;
- Use of developer contributions/community infrastructure levy funds to contribute to improvements to waste water treatment works or appropriate measures to release capacity for new development."

9.26 **Commentary**

The emerging local plan maintains the objectives of the higher-level planning policy, with a clear priority for economic growth, which is sustainable and therefore does not result in any substantive social, environmental or economic adverse impacts. On these terms, it is highlighted that such growth should be achieved whilst protecting highway safety and residential amenity, by introducing mitigation measures as appropriate. The proposed junction improvement works at the Pickhill Lane/A525 junction represent a considerable investment by Maelor and will directly address and improve highway safety.

LOCAL PLANNING POLICY – SUMMARY

- 9.27 Across both current and emerging local planning policy, there is clear support for development which facilitates the economic, social and environmental well-being of the Wrexham Borough.
- 9.28 It is acknowledged that where appropriate, the potential impact of development should be effectively mitigated to ensure that any proposal can be effectively delivered , in turn making them more acceptable

within their local context. In this context, highway safety and wider environmental considerations are highlighted as important material considerations that should be addressed through effective measures to mitigate any unacceptable impacts.

- 9.29 The proposed increase to production is compliant with local planning policy on the basis that it supports the continued growth of Maelor and facilitating further growth for the wider Wrexham economy. In turn, the application proposal provides suitable mitigation measures to limit the impact of development through effective junction improvement works. The provision of further on-site plant/equipment through the parallel planning application will secure an enhancement of the environmental site management measures to ensure compliance with the separate Environmental Permit.

10.0 SOCIO-ECONOMIC IMPACT

- 10.1 The role of the decision maker is to identify the benefits, identify harms and weigh them all up to arrive at a decision. The more important an impact, the more weight it is given in the overall planning balance.
- 10.2 The Economic Impact Report prepared by Wisher Consulting sets out the economic context of Maelor Foods and its plans to double production throughput via the introduction of an additional production line.
- 10.3 The report sets out that the Maelor supply chain is essential to understanding its full economic impact. Prior to receiving birds for slaughter, Maelor makes several large-scale supply chain purchases:
- Maelor buys large volumes of day-old chicks. Over 50% are hatched in the Wrexham area.
 - The business then employs a range of growers to grow the chicks into slaughter-ready birds. A good number of these growers are located in the North Wales area.
 - Maelor also buys all the chick feed to send to growers. The business wants to control the type and quality of food they provide to chicks. As above, a significant proportion of this food comes from local suppliers, with over 75% purchased from the Wrexham area.
- 10.4 As referenced within the Economic Impact Report, the expansion of Maelor's processing would involve three separate contributors to the local economy, as follows:
- **Direct Employment** - 50% increase on direct on-site employment, taking this figure from c.250 to c.375 jobs.
 - **Indirect employment** - Upstream supply chain impact of broadly 100% growth, with the doubling of production, the main supply chain spend (chicks, grower payments, feed) will also broadly double in scale.
 - **Induced employment** – total off-site employment uplift of 185 jobs throughout the UK economy.

Table 5.1 : Summary of Job & GVA Uplift Effects

	Current		Expansion		Revised Total	
	Jobs	GVA	Jobs	GVA	Jobs	GVA
On site	250	-	125	-	375	-
Off site	375	-	185	-	560	-
Total	625	£40M	310	£20M	935	£60M

Source : Wisher Consulting/Maelor Foods

- 10.5 It is clear Maelor makes a significant contribution to the local economy through direct, indirect and induced investment. The positive socio-economic impact of the proposed development is considerable and the importance of this impact should not be underestimated. Accordingly, considerable weight should be given to it in the overall planning balance.
- 10.6 Maelor has been a growing business for many years and it is important to the applicants that they retain their market position. An inability to grow will risk the company losing key current customers who are themselves on a strong growth curve. That growth needs to occur at a single site, as two separate sites would introduce an unwelcome element of inefficiency and would not be financially resilient. An inability to grow would inform future investment decisions in this location.
- 10.7 In the current economic climate, it is essential that local authorities support growth-orientated businesses and particularly those that fall within established target sectors such as Food & Drink. In this context, the contribution of Maelor Foods to Wrexham and its economy should not be underestimated.
- 10.8 Further, it is our understanding that the recent closure of a rival operator in Derbyshire, would mean that an increased production ability at Maelor would have a positive benefit from both a local economy perspective and an animal welfare perspective. Growers, that previously served the rival operator, are actually more local to the Maelor Facility. An increased capacity at Maelor would facilitate the opportunity to work with those growers. There would be an increased contribution to the wider local economy. In addition to economic impact, there will be an added benefit to animal welfare in respect to travel distances.

11.0 PLANNING ISSUES / MERITS

PRINCIPLE OF DEVELOPMENT

- 11.1 In considering the acceptability of the proposed development, the starting point is establishing the level of compliance with the relevant national and local planning policy and guidance. If it can be demonstrated that the proposal meets this guidance then in principle, and subject to site specific considerations, the development can be supported and the planning application approved.
- 11.2 The basis of the development control system requires that proposed development is considered within its context and that applications are determined on a site-specific basis and on their individual merits. It is therefore appropriate to consider the proposed development as a whole, not only the physical impact of new development within the surrounding environment, but also its impact upon socio-economic matters and commercial viability.
- 11.3 In this respect the existing use/development of the site is of particular significance.
- 11.4 The absence of any physical extension or alteration of the premises ensures that all matters of visual impact, ecology, flood risk, foul and surface water drainage are not material to the determination of this application proposal. The only additions required at the facility are in respect of an expansion of the existing wastewater treatment plant, which are the subject of a concurrent planning application. The relevant environmental considerations relating to the operational expansion of the facility at the Maelor site are dealt with as part of the standalone Environmental Permit application, considered under separate legislation from the Planning regulations.
- 11.5 The proposed junction improvement works at the Pickhill Lane/Cross Lanes junction will ease the flow of vehicles and improve highway safety. The works represent a considerable investment from Maelor, in the region of £400,000, and are directed at improving highway safety and mitigating any operational impacts.

- 11.6 The environmental permitting process is principally concerned with potential issues of noise, odour, water pollution, site contamination and air quality. Again, these are matters that are substantially confined to the permitting process, as any proposed expansion will be contained within the existing built footprint and any further built development will be limited to the provision of plant and equipment relating to further environmental management measures.
- 11.7 The current operation at the Maelor site ensures that the principle of a poultry processing facility within this part of Wrexham is now well established. That position has been reinforced by subsequent planning consents for a series of measures in extension, enhancement and improvement of the facilities to support the continued growth of the company. In this established context, the key factor in determination of this planning application is whether the operational use of the site will cause any unacceptable harm to the amenity of local residents or users of the local highway network.

HIGHWAYS / TRANSPORT

- 11.8 The condition that is the subject to this application originated from considerations around highway safety and impact upon residential amenity, with a restriction being placed on weekly production at the site that would in turn restrict vehicle movements associated with the site.
- 11.9 Vectos, as Highway Consultants, have had a longstanding involvement with the Maelor Foods site and have assessed the existing highway position, and projected the highway position following the proposed increase to production.

HIGHWAY SAFETY

- 11.10 The site is currently operating short of permitted capacity, which generates a total of 588 HGV movements per week (6-days, Mon-Sat). In turn, factored for the permitted 1 million birds per week, permitted capacity would present a total of 603 HGV movements per week (6-days, Mon-Sat). The majority of movements occur between 09:00 and 15:00.

11.11 The majority of HGVs/MGVs exit Pickhill Lane and turn left to proceed onto the A525 (Southbound), but entry movements onto Pickhill Lane are more evenly distributed from both the north and the south.

11.12 As demonstrated within Vectos' Transport Assessment, in light of the traffic survey, considerable HGV movements occur on Pickhill Lane which are unrelated to the operation of the Maelor Foods site. As that assessment confirms:

"on the busiest day (Wednesday) HGV movements on Pickhill Lane were 179; therefore, applying Figure 3.1, [profile of Maelor HGV movements] around 65 HGV movements on Pickhill Lane will have been movements associated with other unrelated operations."

11.13 As part of the latest proposals, a commitment is being made by Maelor Foods to improve the Pickhill Lane/A525 junction. The proposals seek to realign the Pickhill Lane approach to the A525 to facilitate the movement of vehicles, particularly large vehicles. The kerb radii will also be increased to 16.0m.

11.14 As a result, large vehicles exiting Pickhill Lane, turning left and heading south along the A525 will no longer be required to cross the centreline of the carriageway. Whilst this has not historically resulted in any accidents, the proposals remove this specific risk from the highway network at this location.

11.15 The Transport Assessment evidences that the highway network can suitably accommodate the projected flow to and from the site, in accordance with highway improvement works at the Pickhill Lane/Cross Lanes junction, so as to improve visibility, accordingly enhancing highway safety.

11.16 The Transport Assessment confirms that up to 2 million birds per week can be processed on site without detriment to highway safety, ensuring pedestrian and vehicle safety.

RESIDENTIAL AMENITY

11.17 The other key factor associated with vehicle movements is whether the operational use of the site will cause detrimental impact upon the amenities of local residents or users of the infrastructure in the locality.

Again, the absence of any physical extension or alteration of the premises ensures that all matters of visual impact, ecology, flood risk, foul and surface water drainage are not material to the determination of this application proposal.

- 11.18 The permitting process will also address any issues of noise, odour, water pollution, site contamination and air quality. These considerations are each dealt with as part of the separate Environmental Permit application and the separate planning application that has been submitted for additional plant/equipment, to ensure compliance with the anticipated environmental permit requirements.
- 11.19 Maelor Foods have an operational Service Management Plan and Driver Charter which outlines the ways in which Maelor Foods will successfully coordinate and manage all deliveries to and from the site, including how to maximise operational efficiency and be a good neighbour to residents and people who live locally.
- 11.20 The management strategy includes a dedicated booking system, coordination of deliveries outside of peak times (where possible), and close working with local suppliers to better plan journeys and reduce total trip distance travelled on the network.
- 11.21 This implemented Servicing Management Plan and Driver Charter will continue to be abided by to ensure that the increase in operations has minimal impact on the local community. This has proven to be a very effective mechanism to control movements to and from the site and, as a consequence, there has been a considerable reduction in resident complaints relating to transport movements at the site.
- 11.22 From 2019 to 2021, there has been an 86% reduction in annual resident complaints to NRW with respect to the operation of the Maelor site.
- 11.23 It is, in this context, important to note that many of the concerns of local residents relate to localised and very immediate problems. As is demonstrated by the reduction in complaints, Maelor have very successfully dealt with these issues through localised responses and often quite modest adjustments and interventions. This approach has been very effective and reflects the businesses deep-rooted and ongoing concern to ensure that local residents are secure in their enjoyment of their homes.

- 11.24 In addition to site specific managing activity, it should be noted that the existing residential properties on Pickhill Lane have a combined frontage of just under 70 metres. When considering the HGV movements to and from the site, a vehicle will have passed these properties within some 10 seconds, minimising the amount of time that any vehicle is within the immediate vicinity of this frontage. The existing properties are also set back from the road by approximately 10 metres and benefit from a variety of boundary treatments (i.e. hedge and other vegetation, fence and wall). Each property has double glazing and there are private garden spaces to the rear of the properties that are some 20m from the road and that are screened by the properties.
- 11.25 These conditions ensure that the neighbouring residential properties are substantially protected from the impact of the identified vehicular movements associated with the proposed development and ensure that any harm to residential amenity will be negligible. Maelor will also continue their policy in monitoring and responding to localised concerns and this focused approach is intended to ensure that the amenity of local residents will continue to be safeguarded.

FURTHER POTENTIAL ENHANCEMENTS

- 11.26 There is currently a condition in place that restricts HGV movements on Sundays. A sensitivity test has been undertaken to understand the daily impact of HGV movements if movements were spread over a 7-day working week, as oppose to a 6-day working week.
- 11.27 As is presented in the Transport Assessment, if around 100 two-way HGV movements were permitted on Sundays, Monday to Saturday daily HGV movements would decrease relatively and on the busiest day (Wednesday) there would be 22 fewer HGV movements.

OVERALL BENEFITS ASSOCIATED WITH THE SCHEME

SOCIO-ECONOMIC

- The proposed increase to production will facilitate Maelor's continued growth in this location and ongoing security in a competitive market.
- The **£18 million investment** in the facility itself in the form of a new production line and associated on-site plant will enhance the existing environmental management measures and will ensure compliance with the separate Environmental Permit.
- The proposal should secure some **125 additional jobs** on site associated with the increase in production.
- The upstream supply chain will broadly benefit from 100% growth, with the doubling of production. The main supply chain spend (chicks, grower payments, feed) will also broadly double in scale.
- The total off-site employment uplift is estimated at 185 jobs-
- **£165 million uplift to the wider supply chain.**

HIGHWAY SAFETY / RESIDENTIAL AMENITY

- Junction improvement works at the Pickhill Lane/A525 junction. This represents a considerable commitment and investment by Maelor, in the region of £400,000.
- Visibility splays of 120m are achievable in either direction (as appropriate for the signed speed limit), which represents a significant **increase in the visibility to the south compared to the existing junction alignment.**

OTHER MATERIAL CONSIDERATIONS

NOISE

- 11.28 A Noise Impact Assessment (NIA) has been prepared by Environoise. The assessed noise sources were the external plant and additional HGV deliveries associated with this increase in production.
- 11.29 The Assessment is based on the operational capacity of the site being 2 million birds and the associated plant / machinery / buildings / vehicle movements.
- 11.30 Background noise levels were assessed and contextualised within the 'post-development' situation, calculating the impact of additional external plant and HGV movements.
- 11.31 The NIA concludes that existing and predicted noise levels associated with the site will be within recommended limits and accordingly no mitigation measures are required.
- 11.32 Accordingly, the proposed increase to production will not cause unacceptable impact in respect of the material consideration of noise.
- 11.33 The separate environmental permit application will deal with this consideration in its own right. The application will find noise impact to be acceptable in order to grant the permit.
- 11.34 As a matter of course the site operator follows a strictly applied noise management plan. Again this is referenced in detail in the separately submitted EP variation application.

ODOUR

- 11.35 An Odour Impact Assessment has been prepared by ADAS. This Assessment is based on the operational capacity of the site being 2 million birds.
- 11.36 The report makes recommendations with respect to Odour control, so as to conclude the increase in production to be acceptable, including upgrades to the existing chemical scrubber and the installation of an

additional chemical scrubber. These matters are the subject of a separate planning application for additional plant / equipment across the operational site.

11.37 On this basis, the report concludes that the significance of the predicted odour impact is assessed to be 'negligible' at all receptor locations using the IAQM assessment criterion.

11.38 Accordingly, the proposed increase to production will not cause an unacceptable impact in respect of the material consideration of odour.

11.39 The separate environmental permit application will deal with this consideration in its own right. The application will find the odour impact to be acceptable in order to grant the permit, in line with the conclusions of the Odour Impact Assessment.

DOMESTIC FOUL WASTE / SURFACE WATER DRAINAGE / EFFLUENT WATER

- 11.40 A series of drainage conditions have been discharged in respect of the original change of use permission and the subsequent permissions at the site. Natural Resource Wales have been a consultee to these applications and have supported the proposals.
- 11.41 Separate from the Planning process, Maelor Foods have gone through the appropriate procedures in applying for an Environmental Permit for the operation of the site. This procedure is overseen by Natural Resource Wales. A package of supporting information has been submitted as part of the Environmental Permit application that is based upon the facility operating at 2 million birds per week.
- 11.42 The proposed increase to production will not cause any unacceptable impacts in respect of the material consideration of domestic foul waste / surface water drainage / effluent water.
- 11.43 The separate environmental permit application will deal with this consideration in its own right. The application will find the proposed drainage / water treatment strategy to be acceptable in order to grant the permit. This is subject to a separate planning application for additional plant/equipment in managing the processing at the site.

NITRATES

- 11.44 New targets were recently imposed by Natural Resources Wales (NRW) in the interest of ensuring developments do not increase phosphate pollution in rivers which form part of Special Areas of Conservation (SAC).
- 11.45 The separate Environmental Permit process will deal with the potential Phosphorous impact as a consideration and the supporting assessment demonstrates that there should be no unacceptable impact associated with the grant of the permit.
- 11.46 An assessment has been undertaken with regard to the wastewater discharge to the River Dee resulting from the proposed increase to production. That assessment concludes that the proposed increase in average operational discharge (from 1,200 m³/day to 2,400 m³/day)

is predicted to result in a worst-case scenario 1.2% increase in mean phosphate (0.083 to 0.084 mg/l.)

11.47 For the increase in the maximum discharge (from 1,520 m³/day to 3,120 m³/day) a worst-case scenario of 2.4% increase in mean phosphate (0.083 to 0.085 mg/l) is predicted.

11.48 On the basis of the superior water quality achieved by the WWTP at Maelor, the assessment concludes that the discharge from the WWTP when operating at 2 million birds per week will have a **neutral, non-detrimental impact on the SAC phosphate target** for the River Dee SAC.

ENVIRONMENTAL PROTECTION / CONSIDERATION

11.49 It is clearly expressed that the site in question will be the subject of an Environmental Permit (Pollution Prevention & Control) (PPC), regulated by the statutory body Natural Resources Wales (NRW). Any concerns related to matters of environmental protection will be addressed by NRW accordingly. The separate planning application submitted for additional plant/equipment will ensure compliance with this Environmental Permit.

12.0 WIDER SUPPORT AND ENGAGEMENT

- 12.1 For developers, communities and decision makers, one of the biggest challenges in taking forward a development scheme is to ensure that public engagement is undertaken in a way which is meaningful, inclusive and brings benefits for all involved.
- 12.2 Whilst a formal pre-application consultation exercise (PACE) has not been undertaken, as the regulations do not require the applicant to do so in this case, an equivalent consultation activity has been undertaken voluntarily.
- 12.3 A **Community Engagement Report** has been prepared by BECG which outlines in detail the scope of the community engagement efforts made and outlines what further steps Maelor Foods will be undertaking to keep local residents and other interested parties informed moving forward.
- 12.4 Since purchasing the site the site operator has maintained positive dialogue at both a local level, with the Council's own Business & Investment Team, and at a national level, with representatives of the Welsh Government. It is our understanding that both parties endorse the facility and the proposed level of operation that this application is seeking to achieve. This is endorsed within the accompanying Community Engagement Report.
- 12.5 This is further highlighted by the recent media coverage, associated with the visit of MP's to the facility.
- 12.6 As set out in the Community Engagement Report, it is the intention of Maelor Foods, in association with BECG, to keep relevant stakeholders and residents updated throughout the planning process.

STAKEHOLDER ENGAGEMENT

- 12.7 Stakeholders were invited to meetings, for a tour of the facility, or via MS Teams.
- 12.8 Feedback from these meetings has been highly constructive, and has helped to inform the project team on the views of local stakeholders

and political leaders, especially regarding the importance of business growth in Wrexham, with a view to the positive socio-economic benefits Maelor Foods' operations at Pickhill Lane provide to the local and regional economy.

NEIGHBOUR ENGAGEMENT

12.9 The site's nearest neighbours were also invited to meetings at the site.

12.10 The main concerns expressed during the one-to-one meetings with neighbours was the potential impact of increased HGVs accessing the site. Highways Consultant, Vectos have undertaken a Transport Assessment to understand the impact that growth will have on the surrounding road network, specifically the junction on Pickhill Lane.

12.11 In response to the concerns as set out above, Vectos have designed junction improvement works at the Pickhill Lane/Cross Lanes junction to improve visibility and highway safety, concluding the proposals acceptable on highway grounds. This represents a considerable investment to improve highway safety, which has been a fundamental commitment by the applicant.

12.12 Maelor are undergoing considerable engagement to understand and effectively mitigate any concerns for residential amenity associated with the increased production. However, it must be acknowledged that of the residential properties immediately adjacent to the operational site, of which there are 5 no., 2 no. are under ownership of Maelor Foods. There are ongoing discussions in respect of acquiring further.

ONGOING ENGAGEMENT

12.13 Maelor Foods will continue to operate an open-door policy for its neighbours to discuss concerns they have and will continue to work with them to ensure that measures are put in place that suit the needs of residents to protect their amenity as required.

12.14 Maelor pride themselves on being good neighbours. Where an impact upon residential amenity / highway safety is identified, Maelor will *address, improve and invest*.

13.0 UK POULTRY PROCESSING

- 13.1 According to the latest DEFRA publications on UK Poultry & Poultry Meat statistics, circa 20 million birds are slaughtered per week in the UK. There are a limited number of facilities across the UK that are associated with the poultry industry, with the main operators being the 2 Sisters Food Group, Moy Park and Avara Foods.
- 13.2 In consideration of the following information obtained for the key sites in England & Wales, it is evident that across the sites, between 1 and 2 million birds are being processed at each site. As such, there is a clear 'optimum' to processing at one single site, which is in the region of 2 million birds per week. The Maelor site is simply looking to operate in line with competitors and compete in what is a continually growing industry.
- 13.3 It must be further noted that the supply of birds to the industry in the UK is only circa 50% 'self-generated' in the UK. The majority is imported, principally from Thailand, Brazil and Poland. It is expected that this bias will swing towards a UK generated supply of birds in light of Brexit, hence the numbers being slaughtered in the UK will increase and existing facilities will need to cater to meet this changing market.
- 13.4 The following provides a simple summary of the numbers of birds being processed at the main poultry processing sites across Wales and England, the operations at the sites being directly comparable to that approved at Maelor, i.e. slaughtering / cutting / packaging.

** please note that the numbers set out are best estimates provided by recognised industry professionals and publicly available information. Exact figures are commercially sensitive and not available in the public domain.*

<u>Operator</u>	<u>Site / Location</u>	<u>No. of birds processed / week</u>
Freemans of Newent Limited	Newent, Gloucestershire	2.25 million
2 Sisters Food Group	Scunthorpe	1.95 million
Avara Foods	Brackley, Northamptonshire	1.9 million

2 Sisters Food Group	Sandycroft / Llangefni	1.5 million
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- 13.5 The above analysis demonstrates how the proposed level of production at Maelor is consistent with other Poultry processing plants across the country and as such there is nothing exceptional about the scheme.
- 13.6 On the basis of the above analysis, this application, in conjunction with the separate Environmental Permit application and accompanying planning application for additional plant/equipment seeks to bring the site in line with the industry optimum size and operation. With this in mind, any future growth at Maelor should be marginal and limited to modest incremental and operation adjustments.

14.0 ENVIRONMENTAL PERMIT

- 14.1 Separate from the permitted use of the site, as approved through the Planning process, the poultry processing facility at Maelor has had to make an application for an Environmental Permit. This is made in accordance with the Environmental Permitting (England & Wales) Regulations 2016.
- 14.2 Some facilities could harm the environment or human health unless they are controlled. The environmental permitting regime ('the regime') requires operators to obtain permits for some facilities, to register others as exempt and provides for ongoing supervision by regulators. The aim of the regime is to:
- protect the environment so that statutory and Government policy environmental targets and outcomes are achieved
 - deliver permitting and compliance with permits and certain environmental targets effectively and efficiently in a way that provides increased clarity and minimises the administrative burden on both the regulator and the operators
 - encourage regulators to promote best practice in the operation of facilities
 - continue to fully implement European legislation.
- 14.3 The Environmental Permit is issued by Natural Resource Wales (NRW). A strict assessment applies in respect of all manner of site considerations, including emissions to water / air / land, odour, noise, etc..
- 14.4 An application has been submitted for the Environmental Permit in line with this Planning Application. It must be noted that the approved planning permission and environmental permit should complement each other in respect of permitted bird numbers. It is therefore presented that the environmental considerations will be dealt with as part of this Permit process, which will only be provided on the basis that the environmental impacts are acceptable, as set out in this Statement.

15.0 SUMMARY & CONCLUSIONS

- 15.1 At its core, planning is about formulating a decision based upon Planning Balance, comparing the benefits of a proposed development with the harm it may potentially cause. Very rarely are developments entirely without harm, or entirely without benefit.
- 15.2 The role of the planner is to identify the benefits, identify harms and weigh them all up to arrive at a decision. The more important an impact, the more weight it is given in the overall planning balance.
- 15.3 On this basis, the key planning issues in the determination of this application are considered to be as follows:
- Conformity to the Development Plan;
 - Impact upon the character and amenity of the area;
 - Impact upon transportation and accessibility;
 - Impact upon wider economy; and
 - Opportunity for sustainable development.
- 15.4 In considering the planning merits of any development proposal, the starting point is the development plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act 2004. If it can be demonstrated that the proposal accords with the policies of the development plan, or that material considerations do not indicate that the application should be determined other than in accordance with the development plan, then planning permission should be granted.
- 15.5 This application is directed at the variation of a condition attached to an original change of use permission, and subsequent applications for additional works / extensions / plant at the facility, limiting the operational capacity of the site by reference to HGV movements. The condition was secured at appeal to limit the movement to/from the site in the interests of residential amenity and highway safety.
- 15.6 The application proposal is consistent with the commitment to delivering sustainable development and provides the opportunity to make a significant contribution to each of the well-being goals of the Well-being of Future Generations (Wales) Act 2015.
- 15.7 The key policy objectives of Future Wales seeks to encourage economic growth in local areas and beyond. This is particularly the case in the

Wrexham and Deeside area, which is identified as a main focus for growth as part of the National Growth Area. On this basis, the proposed development supports the principles of Future Wales by encouraging economic growth in the local area and beyond.

- 15.8 The site is an existing operational facility, which has been operational for over 80 years. The submitted Economic Impact Report confirms that considerable economic benefit will be delivered in line with the increase in production, in the form of direct, indirect and induced impacts. This Statement, in conjunction with the accompanying reports, confirms that the application proposal will secure sustainable development and that all relevant social, economic and environmental considerations are supported by the proposal.
- 15.9 The existing operator has invested heavily in the facility, currently standing at c. £20 million, which in turn has been a major boost for the local economy and employment market. This investment must be supported to maintain the facility for current and future generations, in turn supporting the fundamental principles of sustainable development.
- 15.10 The additional highways movements associated with the proposed development will not be to a level to cause any material impact upon highway safety. This is on the basis of the proposed highway improvement works at the Pickhill Lane/Cross Lanes junction and is evidenced within the submitted Transport Assessment. These works would be undertaken at considerable cost site operator, being in the region of £400,000.
- 15.11 The other key factor associated with vehicle movements is ensuring that the operational use of the site does not cause detrimental impact upon local resident's amenity or users of the infrastructure in the locality. The Maelor Foods operational Service Management Plan and Driver Charter oversees the management of deliveries to and from the site, including how to maximise operational efficiency and be a good neighbour to residents and people who live locally.
- 15.12 The management strategy includes a dedicated booking system, coordination of deliveries outside of peak times (where possible), and close working with local suppliers to better plan journeys and reduce total trip distance travelled on the network.

- 15.13 The accompanying Transport Assessment provides context and clarification to the 'post-development' position. The associated proposed highway improvement works are a response to this position and, represent a significant investment, concluding that there will be no unacceptable highway impacts.
- 15.14 The absence of any physical extension of the premises ensures that all matters of visual impact, ecology, flood risk, foul and surface water drainage are not material to the determination of this application proposal. The environmental permitting process will address any issues of noise, odour, water pollution, site contamination and air quality, which are each dealt with as part of the separate Environmental Permit application and the separately submitted planning application for additional plant / equipment on the operational site.
- 15.15 The site is an existing commercial site and has been for over 80 years. The existing operator has invested heavily in the new facility, which in turn has been a major boost for the local economy and employment market. This investment is needed to maintain the facility for current and future generations and supports the principles of sustainable development.
- 15.1 This S73 application seeks to secure the variation of the conditions identified on the associated planning permissions **P/2014/0781**, **P/2015/0838** and **P/2017/0165**, as attached to the appeal decision Condition No. 7, references: **APP/H6955/A/18/3216187**; **APP/H6955/A/18/3216190** and **APP/H6955/A/18/3216188**.
- 15.2 It is requested that this condition be **varied** to read:

"No more than 2,000,000 birds shall be processed each week at the site subject to this permission."

16.0 APPENDICIES

APPENDIX 1

Media Coverage

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125 new jobs could be created at Maelor Foods, Wrexham

10th June



Maelor Foods (image: Maelor Foods)

By Emily Ash
 @emilyash_leader
 Reporter



More than 120 jobs could be created as poultry processor, Maelor Foods, hopes to double the capacity of birds its Wrexham plant can handle to two million.

The facility is based on Pickhill Lane in Cross Lanes and the increase in operations could see a boost of £13 million to the Wrexham economy, the firm claims.

The company currently employs 251 people at the site and processes up to 1 million birds a week.

But demand for poultry in the UK has soared in recent years. Around 24 million chickens are eaten every week and national retailers are seeking to source more of their produce from UK farmers and growers.



With demand far outstripping supply, Maelor Foods is looking to submit a planning application to Wrexham Council to vary a planning condition, which currently limits production at the facility to 1 million birds a week.

Ricky Mehta, a director at Maelor Foods said: "Since we started operating at Pickhill Lane in 2014 there have been various restrictions limiting the amount of production that we can do at the site. When we started operating in 2014 this restriction was set at 400,000 birds a week and in 2019 this was lifted to 1 million birds.

"Across the UK similar poultry processing facilities are not subjected to any restrictions on the amount they process. So, we will shortly be asking Wrexham Council to raise the existing restriction to a maximum of 2million birds a week.

MORE NEWS:

- **1,000 jobs at multi-million pound bottle factory to transform valleys economy**
- **Town Council seek to resolve footpath dispute with businessman**

"Our existing facility is able to process an additional 1million birds without any physical expansion. But it would enable us to employ an additional 125 staff and generate an additional £13million for the Wrexham economy every year.

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FOR ALL OF WALES

Wrexham.com > News

Posted: Thu 2nd Jun 2022

Clwyd South MP given tour around state-of-the-art poultry processing facility



The MP for Clwyd South was recently given a tour around a state-of-the-art factory in Wrexham to learn more about the investment the company brings to the local area.

Maelor Foods has operated a poultry processing facility in the area since 2015, creating 251 jobs and has invested over £20 million into the facility.

It is one of the most advanced of its kind in Europe, processing home reared chickens of the highest standard, supplying retailers and food service companies.

It sources the chickens from a wide range of farms including 12 in Wales – three of which are in the Clwyd South/Wrexham area.

During the visit, Mr Baynes was able to learn more about the company and their plans for the future including investing further in Clwyd South such as creating new jobs and improving sustainability.

Mr Baynes was also able to understand the ways in which Maelor Foods engages with the local community through sponsoring Marchwiel Villa FC, providing a minibus service for a local care home and also raising money for Nightingale House Hospice.

Mulkh Mehta, Director of Maelor Foods, said: “I’m grateful to Simon for taking the time to visit us and find out more about our state-of-the-art facility.

“I’m pleased Simon recognised the contribution Maelor Foods makes to the Clwyd South economy and the work we do to support the local community. We look forward to working with him more closely as we look to invest in our future.”

After the visit Simon Baynes MP said: “It was a pleasure to visit Maelor Foods and to learn more about the company and their aspirations for the future.

“I was impressed to hear how the company is going from strength to strength and the ways in which Maelor Foods engages with the local community.

“I wish Maelor Foods the very best for the future.”

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APPENDIX 2

Accreditations

ACCREDITATIONS

- 16.1 Salisbury Poultry are accredited by the following organisations. They have numerous farming partners supplying 'Red Tractor' British poultry, with full traceability including HACCP.
- 16.2 Each of their partners are audited and are also subject to independent and regular audits so that they can ensure animal welfare and food safety.

BRITISH RED TRACTOR



- 16.3 Red Tractor is a food assurance scheme which covers production standards developed by experts on safety, hygiene, animal welfare and the environment amongst other things. The Red Tractor logo on pack means your food or drink has met these responsible production standards and is fully traceable back to independently inspected farms in the UK.

BRC



- 16.4 BRC is a leading safety and quality certification program, used by over 21 000 certificated suppliers in 90 countries. The standards guarantee the standardisation of quality, safety and operational criteria and ensure that manufacturers fulfil their legal obligations and provide protection for the end consumer. BRC global standards are now often a fundamental requirement of leading retailers.

SAI GLOBAL / AA



- 16.5 SAI Global is the premier third party independent inspection and certification service, providing retailers, manufacturers, farmers and caterers, throughout the world. With expert inspection and certification of their operations to ensure that only the highest standards are maintained.
- 16.6 Sai Global also inspect against various industry quality assurance schemes, covering an extensive range of products.
- 16.7 Maelor Foods Processing Division has the benefit of both Sai Global / BRC Certificates and Red Tractor approval.

FOOD STANDARDS AGENCY



- 16.8 The Food Standards Agency works to safeguard public health and protect the interests of consumers in relation to food.
- 16.9 The FSA's job is set out in law, working closely with the UK Government and the governments in Wales and Northern Ireland, however they act independently and transparently, led by science and evidence.
- 16.10 Maelor Foods Slaughtering Division was granted conditional FSA approval on 08 November 2017 and started commissioning week commencing 13 November 2017.
- 16.11 The Company now operates fully FSA approved.



- 16.12 Tesco Welfare Approval livestock requirements ensure transparency across supply chains and are designed and regularly reviewed to drive improvement.
- 16.13 The approval process covers all aspects of animal rearing including health, welfare, feed, production systems, environment, stocking, transport and slaughter, all encompassing the Five Freedoms proposed by the Farm Animal Welfare Committee.
- 16.14 In May 2021, the company was approved by Tesco to supply poultry product, further growing its retail presence.

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