
Planning Statement

Wrexham Association Football Club
Racecourse Ground
Mold Road
Wrexham
LL11 2AH

Prepared for:

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Planning Statement

The Racecourse Ground, Wrexham AFC



Document Control

Revision	Description	Prepared by	Reviewed by	Date
Draft	Draft for comment	SDR	PB	06/06/2022
Draft	Final Draft	SDR	PB	10/06/2022

Planning Statement

The Racecourse Ground, Wrexham AFC



Contents

1.	Introduction	1
2.	Site Description & Context	3
3.	Proposals	6
4.	Planning Policy Overview	7
5.	Assessment	8
6.	Conclusion	12

1. Introduction

1.1. Introduction

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

1.1.2. WAFC is proposing significant investment through the redevelopment and improvement of the Kop Stand at the Racecourse Ground, with further information on this emerging during summer 2022. As such, and as part of the improvement to the Site, an application is being submitted to Wrexham County Borough Council ("WCBC"), as the Local Planning Authority ("LPA") for:

"Erection of freestanding and stand mounted floodlights (and associated works)"

1.1.3. A detailed description of the proposals, including a breakdown of the elements for which full planning permission are being sought, is provided in Section 4 of this Statement.

1.2. Application Documents

1.2.1. The application documents comprise:

- Application Forms and Ownership Certificates;
- Covering Letter by Savills;
- Design & Access Statement by AFL Architects;
- Lighting Assessment by Ramboll;
- Various drawings;
 - 211509-AFL-ZZ-ZZ-DR-A-00204 (Site Location Plan, AFL);
 - 211509-AFL-ZZ-ZZ-DR-A-00203 (Floodlight Tower Details, AFL);
 - 211509-AFL-ZZ-ZZ-DR-A-00205 (Existing and Demolition Site Plan, AFL);
 - 211509-AFL-ZZ-ZZ-DR-A-00206 (Floodlights Proposed Site Plan, AFL); and
 - 211509-ADL-ZZ-ZZ-DR-A-00301 (Existing and Proposed Floodlights, AFL).

1.3. Statement Structure

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

2. Site Description & Context

2.1. Preface

- 2.1.1. This section provides an overview of the Site, describing its position and context. Further detailed analysis is contained within the accompanying Design & Access Statement (“DAS”).

2.2. Site Description

- 2.2.1. The Site is centred on grid reference SJ32885 50945. The total Site covers an area of approximately 172.00 sqm, located entirely within the administrative area of WCBC. The site Location Plan (Ref. 211509-AFL-ZZ-ZZ-DR-A-00204) with the Site edged in red is enclosed and identifies the likely extent of the proposed works. The site relates only to the areas edged in red, which include the area for the four freestanding floodlights and floodlights mounted onto the stands.
- 2.2.2. The Site is located entirely within the urban settlement boundary. The site constitutes previously developed (or brownfield) land, as defined within PPW11, as *“land which is or was occupied by a permanent structure... and any associated fixed surface infrastructure...”*
- 2.2.3. The proposed development is located within the wider area comprising the home ground of WAFC, which includes associated buildings, facilities, car parking and boundaries.
- 2.2.4. To the north west of the Site is the Wrexham Glyndwr University Campus including the Students’ Union and the William Aston Hall. Immediately to the north is the Wrexham Student Village, beyond that are sports pitches associated with the University and further University buildings. The west of the Site is bound by Crispin Lane, beyond that is the railway line and Wrexham General Train Station. South west of the site is Mold Road (A541) and an area of residential properties to the south of the road. Beyond that is Technology Park and the Wrexham Maelor Hospital.
- 2.2.5. The Site falls within Flood Zone A, therefore considered to be of little or no risk of fluvial or coastal/ tidal flooding.
- 2.2.6. The Site itself has no known heritage assets or historic environment constraints. At a local level, the nearest listed buildings are Plas Coch (part of the University) (Grade II) approximately 500m to the north west and Wrexham General Station (Grade II) approximately 500m to the south. The nearest conservation area is Grosvenor Road Conservation Area approximately 700m to the south west.
- 2.2.7. There are no known Tree Preservation Orders across the Site.
- 2.2.8. The Site is not subject to any ‘sensitive area’ designations as set out within the 2017 Regulations.¹

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

Planning Statement

The Racecourse Ground, Wrexham AFC



2.3. Planning History

- 2.3.1. This section of the Statement will consider planning decisions relevant to the development proposals covering the specific planning history pertinent to the Racecourse Ground.

The Racecourse Ground

- 2.3.2. **Table 3.1** below sets out the history of all substantive planning applications made relating to the Racecourse Ground. The planning history is limited and includes minor applications over the years, of which are not considered of relevance to the current proposals but are noted for information only.

The Racecourse Ground			
Reference	Description	Decision	Decision Date
P/2012/0275	Erection of 1 no. Fascia Sign	Granted	15/05/2012
P/2012/0718	New signage for club shop	Granted	21/11/2012
P/2012/0717	New entrance doors and accessible ramp for club shop	Granted	22/11/2012
P/2013/0215	Erection of four signs at Glyndwr University Racecourse Stadium	Granted	26/04/2013

Table 3.1: Planning history to The Racecourse Ground

Other sites

- 2.3.3. A demolition application has recently been submitted at the Racecourse Ground for the mechanical demolition of the Kop Stand. The application comprises of (but is not limited to) the utility disconnection of tree felling and vegetation removal, asbestos removal, soft stripping and demolition of all structures down to existing floor slab level. In addition, the application for demolition includes the removal of ground floor slabs, foundations, and drainage within the building footprint. The application has recently been submitted and will be considered by WCBC following validation.
- 2.3.4. In proximity to the Site, an outline planning application for the demolition of existing east stand and existing car showroom to facilitate a mixed use development comprising of private residential apartments, student accommodation units, retail, site for new stand and associated works was granted in June 2006 (Planning ref. P/2006/0443). Further, a reserved matters application pursuant to the outline planning permission above was submitted (Planning ref. P/2007/0125).
- 2.3.5. Two applications for the erection of 521/ 319 student bedroom development, construction in two blocks, together with access road, parking and development of east stand/ multi- function arena were granted in April 2009 (Planning ref. P/2008/1296 and P/2008/1295).

3. Proposals

3.1. Preface

- 3.1.1. This section describes the application proposals. The implementation of external lighting at the stadium is necessary to be able to host football matches both in daylight and out of daylight hours. The proposed development caters for the higher lighting requirement required for matches at different levels and achieves the lighting levels required for TV broadcasting.

3.2. Proposals overview

- 3.2.1. Full planning permission is sought for matters comprising:
- Removal of the four existing floodlights and the erection of four new freestanding floodlights;
 - Installation of floodlights mounted on the stands; and
 - Associated works
- 3.2.2. Full planning permission is sought for the erection of floodlights which requires four new columns to be installed. The columns will replace the existing four columns. The towers will be 40 metres in height. As shown on drawings (Floodlight Tower Details, ref. 211509-AFL-ZZ-ZZ-DR-A-00203), the columns have been designed to achieve a cantilever of 20 degrees. The bottom 20 metres of the towers will be in the required tower position whilst the upper 20 metres will achieve the 20-degree tilt to achieve the lighting levels required
- 3.2.3. As shown on the accompanying Floodlight Tower Details drawing (ref. 211409-AFL-ZZ-ZZ-DR-A-00203), Floodlight towers P01 and P02 include a floodlight array of 32 whilst floodlight towers P03 and P04 include a floodlight array of 29.
- 3.2.4. The proposed floodlights will be positions on each of the corners of the pitch, as shown on Site Location Plan (ref. 211509-AFL-ZZ-ZZ-DR-A-00204).

4. Planning Policy Overview

4.1. Preface

- 4.1.1. This section of the Statement details the relevant national and local planning policy context for the Site. It identifies relevant planning and land use policies against which the performance of the proposed development will be assessed. While detailed, this section does not attempt to be exhaustive.

4.2. Wrexham Unitary Development Plan 1996-2011

Wrexham Unitary Development Plan 1996-2011 (February 2005)

- 4.2.1. The existing Development Plan comprises the Wrexham Unitary Development Plan (1996-2011).
- 4.2.2. The site is 'white land' within the adopted Proposals Map.
- 4.2.3. Policy GDP1 presents that all new development within the county should ensure that scale, design and layout accords to the character of the site, while contributing positively to the nearby locality. Further, the policy notes that proposals should ensure the development of sustainable communities, through promoting the economic, social and environmental well-being of the area.
- 4.2.4. The Unitary Development Plan was adopted in 2005 and is largely silent on proposals for sports stadia and the Racecourse Ground. Given the existing land use as a sports stadium and associated facilities, it is considered the existing land use of the Site is completely compatible with the proposed new floodlighting.

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

- 4.3.1. WCBC is also in the later stages of preparing the Wrexham Local Development Plan (LDP2) (2013-2028), which once adopted, will replace the Unitary Development Plan. The LDP2 was submitted to the Welsh Government and PINS on 30th November 2018. The Planning Inspectorate and the Welsh Government received these documents on 18th April 2019. A Matters Arising Changes consultation is currently taking place until 6th July 2022.
- 4.3.2. Given the age of the Unitary Development Plan and the advanced nature of the LDP2, the LDP2 is looked at below as a more useful indication of future foreseeable development.
- 4.3.3. Policy CF3 (Regional Sports Stadia) states that the continued use of a number of sports stadia, including the Racecourse Stadium will be safeguarded. Further, the policy notes that any development which would result in the loss of principal use at the site will not be permitted. Development proposals which enhance existing facilities at the named stadia, including the Racecourse Ground, will be supported by WCBC. It is clear that the LDP2 therefore supports the continued use and enhancement of the Racecourse Ground.

5. Assessment

5.1. Preface

5.1.1. This section assesses the key issues of the application against the planning policy framework identified in Section 4, as well as other material considerations. The assessment of the application is considered under the following key headings:

- Design;
- Heritage Impact;
- Amenity;
- External Lighting; and
- Access.

5.2. Design

5.2.1. A Design & Access Statement accompanies the application and sets out full detailed analysis of the Site, its context and design. That document should be referred to for full details and design critique but the following paragraphs offer an explanation of the high quality design arrived at in respect of the proposed development.

5.2.2. The existing floodlights at The Racecourse Ground comprises of four existing towers, with a single tower placed at either end side of the Wrexrent Stand and the Kop Stand. The existing floodlights have come to the end of their service life and do not cater for the higher lighting requirements needed for higher league games at the stadium.

5.2.3. Discussed in greater detail within the accompanying Design & Access Statement (AFL) the proposals are for the erection of four 40-metre-high floodlight columns with LED lights. The four towers will be positioned at each corner of the pitch. The position of the floodlights have taken consideration of advice provided by lighting specialists and other existing constraints at the Site.

5.2.4. The design of the proposed floodlights incorporates a diamond shape head, which achieves the light distribution needed over the pitch. In comparison to the existing floodlights at the stadium, the proposed tower floodlights are slenderer in design.

5.2.5. The proposed floodlights are deemed necessary at the Site, and the design has been carefully considered to achieve the required lighting requirements as well as appearing visually attractive. The 20 degree cantilever helps visually reduce the height of the floodlights, while the towers appear more slender due to the single tapering mast. The diamond shaped head also achieves a contemporary approach to design.

5.3. Heritage Impact

5.3.1. The Site itself has no known heritage assets or historic environment constraints within its red line boundary. However, heritage assets have been identified in the broad proximity to the Site and are discussed in the following sections.

5.3.2. The nearest listed buildings include:

- Plas Coch (part of the University) (Grade II); and
- Wrexham General Station Entrance Building (Grade II).

Significance

Listed buildings

5.3.3. As noted above, at a local level, the nearest listed buildings are Plas Coch (part of the University) (Grade II) approximately 500m to the north west and Wrexham General Station (Grade II) approximately 500m to the south.

5.3.4. Plas Coch was listed in January 1994. The site was designated for the following reason:

“The building represents a landmark both in the provision of technical education in Wrexham (the college was built to serve the wider N-Wales region) and in design for education, providing highly functional plan, articulated for a precise use, together with innovative services. It is an excellent, little- altered example of the architecture of the early 1950’s and was considered outstanding at the time.”

5.3.5. The Entrance Building of the Wrexham General Station was listed in January 1994. The building was designated for presenting a good example of Great Western Railway Station architecture, with its fine canopy surviving intact. Due to a significant proportion of interest arising from the architectural form and detailing, it is important to consider whether the proposal development will harm the interest. It is considered that, due to separation distances (which are amplified by topographical changes) the works at the WAFC will not harm the architectural significance of the Wrexham General Station Entrance Building.

Conservation Areas

5.3.6. The nearest conservation area is Grosvenor Road Conservation Area, approximately 700m to the south east of the site.

5.3.7. The Grosvenor Road Conservation Area was first designated by WCBC in September 1990, and later amended in July 2007. The Conservation Area is located to the north west of the town centre.

Impact

- 5.3.8. The following section outlines the proposed development and whether this would affect the significance of the designated heritage assets identified above.

Impact on the setting and significance of listed buildings

- 5.3.9. The Site is physically separated from the listed buildings and is not considered to make any contribution to the significance of the Plas Coch Building and the Entrance Building of Wrexham General Station. The works are therefore considered to have no adverse impact on the setting and significance of either the nearby listed buildings.

Impact on the setting and significance of conservation areas

- 5.3.10. Owing to the separation distance to the Grosvenor Road Conservation Area, the proposals would have no impact upon the conservation area. The Site makes no contribution to the conservation area as a result of its geographical separation and history, and the proposals would preserve the Grosvenor Road Conservation Area.

5.4. Amenity

- 5.4.1. A lighting consultant has undertaken a thorough assessment on the existing situation at the site.
- 5.4.2. The Site is located in a well-established urban environment. The proposed development seeks to deliver improvements to the external lighting provision at The Racecourse Ground. Therefore, the proposal development represents a development which is considered entirely appropriate in this established stadium and urban setting.
- 5.4.3. While the proposed development results in higher levels of illumination, it should be considered that the illumination will occur infrequently and will be controlled via a lighting control system. It is considered that during 3pm kick-offs, the floodlights will be turned on from 3pm to 6pm and during later kick-offs (approximately 7pm), the floodlights will be in operating from 6pm till 10pm. Therefore, the floodlights will only be operated for approximately 3 /4 hours during match days.
- 5.4.4. The football ground is considered appropriately located to accommodate such development and it is not anticipated the use of the Site would adversely impact upon the amenity of the existing neighbours. The supporting External Lighting Assessment (Ramboll) assesses the light effects in greater detail.

5.5. External Lighting

- 5.5.1. An External Lighting Assessment (Ramboll) accompanies the application. The proposed lighting scheme comprises of four new freestanding floodlights and a series of floodlights mounted onto the stands. This provides the required lighting levels for safe play, TV broadcasting and caters for higher lighting required for matches at different levels.
- 5.5.2. The existing lighting at The Racecourse Ground includes 4 no. lighting towers, with a single tower placed at either side of the Wrexrent Stand and the Kop Stand. The proposed lighting strategy has been discussed previously in **Section 3**.

- 5.5.3. As discussed within the accompanying External Lighting Assessment (Ramboll) the proposed lighting levels will be designed to Premier League standard (1500 lux). However, it should be noted that the proposed lighting design will have lighting controls to reduce levels to 350 lux to avoid wasting energy when the Club is playing a lower-tier football league match.
- 5.5.4. Further, the frequency of football matches played at The Racecourse Ground played at night does not occur often. The floodlight spill will impact the environment the most during Autumn and Winter (69% of matches are played during this season). A small amount of these games (36%) are played during late kick off, therefore it is not considered that the lighting operational hours will affect the environment.
- 5.5.5. The accompanying External Lighting Assessment (Ramboll) considers the light effects of the proposed development. The assessment has identified the areas nearby which could be affected by light pollution. As noted in the assessment, the areas identified (Wrexham Glyndwr University Buildings and nearby residential properties) currently benefit from existing artificial lighting, comprising of both lighting columns (Wrexham Glyndwr University) and street lighting (residential properties on Mold Road)

5.6. Access

- 5.6.1. As previously noted, a Design & Access Statement accompanies this application (AFL).
- 5.6.2. There are two access points from Mold Road which allows a Mobile Elevated Working Platform to access the ground to enable and maintain the floodlight towers and the lights mounted on the stands. It is therefore considered that there is no issues relating to access due to the lights being safely accessed via an existing entrance.

6. Conclusion

6.1. Preface

- 6.1.1. This section summarises and concludes the content and assessment of the proposals based on the key identified issues.

6.2. Conclusion

- 6.2.1. This Planning Statement has been prepared in support of a full planning application made on behalf of Wrexham Association Football Club for the erection of four freestanding floodlights and a series of floodlights mounted onto the stands (and associated works) at The Racecourse Ground, Wrexham.
- 6.2.2. The provision of the floodlights and associated works will provide improved lighting at the ground and will therefore comply with the lighting standards set out by UEFA, allowing the ground to host European games. The proposals will provide a significant enhancement over the current provision at the ground.
- 6.2.3. This Statement has summarised the conclusions of the supporting reports and therefore set out the impacts of the proposals with regards to design, heritage, amenity, external lighting and access. The discussion of impacts have set out the numerous benefits of the proposals and found no material reason why the development should not be approved.
- 6.2.4. This Statement has demonstrated the planning case in support of the proposals in the context of relevant planning policy. It has also identified the significant benefits to both the sports ground and the football club as a result of the proposed development. It is therefore respectfully requested that the proposals are recommended for approval and planning permission granted.

Planning Statement

The Racecourse Ground, Wrexham AFC

