

PLANNING STATEMENT: ELECTRIC VEHICLE CHARGING FACILITY INCLUDING FOOD & DRINKS KIOSK

LAND TO THE SOUTH OF MINERS ROAD | LLAY INDUSTRIAL ESTATE |



PREPARED BY



Sirius Planning | 4245 Park Approach |
Thorpe Park | Leeds | LS15 8GB

PREPARED FOR



REPORT NUMBER

TFE1002/PS

REPORT STATUS

Final

REVISION

0

REPORT DATE

February 2022

WRITTEN & PREPARED BY

Francesca Wray | Senior Planner

REVIEWED & APPROVED BY

David Baker | Development Director

AUTHORISED BY

Sirius Planning

CONTENTS

1. INTRODUCTION	5
1.1 PURPOSE OF THIS STATEMENT	6
1.2 FORWARD	6
1.3 SUMMARY OF SITE AND PROPOSAL	6
1.4 THE APPLICANT	7
1.5 PLANNING STATEMENT STRUCTURE	7
1.6 OBTAINING INFORMATION	7
2. THE SITE AND SURROUNDINGS	8
2.1 INTRODUCTION	9
2.2 LOCATION.....	9
2.3 SITE AND SURROUNDINGS.....	9
2.4 SITE ACCESS.....	10
2.5 IDENTIFIED RECEPTORS.....	10
2.6 SITE PLANNING HISTORY.....	10
3. PROPOSAL	12
3.1 INTRODUCTION	13
3.2 PROPOSED LAYOUT	14
4. ENVIRONMENTAL CONSIDERATIONS.....	17
4.1 INTRODUCTION	18
4.2 SPECIFIC ENVIRONMENTAL CONSIDERATIONS.....	18
5. PLANNING POLICY AND MATERIAL CONSIDERATION CONTEXT	20
5.1 INTRODUCTION	21
5.2 LOCAL PLANNING POLICY.....	21
5.3 MATERIAL CONSIDERATIONS	24
6. SUMMARY & CONCLUSIONS.....	30
6.1 INTRODUCTION	31
6.2 ENVIRONMENTAL EFFECTS	31
6.3 PLANNING POLICY	31
6.4 SUMMARY	31

DRAWING SCHEDULE

Drawing Number	Drawing Title	Scale
TFE1002/01/01	Site Location Plan	1:500, 1:20,000
TFE1002/01/02	Planning Application Boundary	1:500
TFE1002/01/03	Site Layout	1:200
TFE1002/01/04	Wider Site Context	1:500
TFE1002/01/05	Food & Drink Kiosk Elevations	1:500
TFE1002/01/06	EV Charging Point Details	1:10
TFE1002/01/07	Security Fence Details	1:25

APPENDIX

Appendix Number	Appendix Title
A	Indicative Lighting Details



1. INTRODUCTION

1.1 PURPOSE OF THIS STATEMENT

- 1.1.1 This Planning Statement has been prepared by Sirius Planning on behalf of SEDG (Miners) Ltd (an SPV of Terra Firma Energy Ltd) in support of an application for planning permission for an Electric Vehicle Charging Facility (EVCF) including a food and drink kiosk, to the south of Miners Road, Llay Industrial Estate, Wrexham.

1.2 FORWARD

- 1.2.1 UK targets for reducing carbon emissions and improving air quality are well-established with a collective overall aim of reducing carbon emissions to net zero by 2050. The electric vehicle (EV) charging sector is critical in order to achieve these commitments. The Committee on Climate Change has recommended that the market for EV's be 100% by 2035 at the latest to meet the 2050 net zero target.
- 1.2.2 In November 2020, the UK government announced the acceleration of the phasing-out of petrol and diesel cars and brought forward a ban of the sale of such cars by 2030.
- 1.2.3 Given this, EV ownership is on an upward trajectory with forecasts of significant growth over the next decade. In 2020 alone, one in ten registrations were of an EV. Vehicle manufactures are responding with multiple new electric and hybrid models being launched and increasing manufacturing volumes. The Society of Motor Manufactures and Traders Association provides vehicle registration data. Figure 1.1 below illustrates the growth in EV's and decline in petrol and diesel vehicles from 2020 to 2021.

Year to date					
	YTD 2021	YTD 2020	% change	Mkt share -21	Mkt share -20
Diesel	135,773	261,772	-48.1%	8.2%	16.0%
MHEV diesel	98,753	60,953	62.0%	6.0%	3.7%
Petrol	762,103	903,961	-15.7%	46.3%	55.4%
MHEV petrol	198,025	119,179	66.2%	12.0%	7.3%
BEV	190,727	108,205	76.3%	11.6%	6.6%
PHEV	114,554	67,134	70.6%	7.0%	4.1%
HEV	147,246	109,860	34.0%	8.9%	6.7%
TOTAL	1,647,181	1,631,064	1.0%		

BEV - Battery Electric Vehicle; **PHEV** - Plug-in Hybrid Electric Vehicle; **HEV** - Hybrid Electric Vehicle, **MHEV** - Mild Hybrid Electric Vehicle

Figure 1.1: The Society of Motor Manufactures and Traders Association Vehicle Data¹

- 1.2.4 Among the concerns with EV ownership is the lack of charging infrastructure across the Country. The UK's aim is to provide a reliable and comprehensive network of charging stations to supply the growing number of EV drivers. It is estimated that the UK will need 400,000 public charge points when the sale of new conventionally fuelled cars and vans is prohibited in 2030. To reach this total, the annual rate at which new charge points are being installed must increase from around 7,000 over the past three years to 35,000 over the next decade; a five-fold increase in the rate of deployment².

1.3 SUMMARY OF SITE AND PROPOSAL

- 1.2.5 The proposed development is for an Electric Vehicle Charging Facility comprising of 10 charging points and bays, a kiosk and associated infrastructure within Llay Industrial Estate. The proposal looks to meet

¹ [New UK EV and AFV Registrations - SMMT monthly data](#)

² "Charging Up" published by Policy Exchange on 2 February 2021

the rising demand in EV charging facilities and seeks to help pave the way for greater usage of EV's in Wrexham.

- 1.2.6 The application site comprises an area of land measuring 701m² situated within a wider industrial plot, which was previously used as a storage facility for a road haulage business. The wider site includes existing planning consents for a Reserve Power Plant (RPP) including a 9.9MW (P/2018/0797) and a 9.95MW (P/2018/0798) extension. Separate Section 73 planning applications are being submitted to amend the site layout of the consented Reserve Power Plant, in order to accommodate the proposal. The proposed design of the EVCF has been developed to co-exist with the consented Reserve Power Plant.
- 1.2.7 The site sits within the Llay Industrial Estate, which is approximately 1km to the north-west of the village of Llay and 6.5km north of Wrexham. Access to the site is via an existing access point off Miners Road.
- 1.2.8 Drawing No's. TFE1002/01/01 and TFE1002/01/03 illustrates the site location and general site layout.

1.4 THE APPLICANT

- 1.3.1 The applicant is SEDG (Miners) Ltd (an SPV of Terra Firma Energy Ltd). Terra Firma Energy (TFE) is a UK based company operating in the renewables and sustainable energy market. Energy storage is key to TFE's vision of producing a clean energy future as without efficient storage capability, electricity production is wasteful and inefficient. TFE have extensive knowledge of energy storage and work on development projects that produce affordable, efficient clean energy not only for the present but also for future generations.

1.5 PLANNING STATEMENT STRUCTURE

- 1.4.1 This Planning Statement has been organised into the following chapters:

- The Site and Surroundings;
- The Proposal;
- Environmental Considerations;
- Planning Policy and Material Considerations; and
- Summary and Conclusions.

1.6 OBTAINING INFORMATION

- 1.5.1 Electronic copies of all documents submitted to Wrexham County Borough Council in respect of the planning application are available on their website.

[Planning \(wrexham.gov.uk\)](http://wrexham.gov.uk/planning)

- 1.5.2 Paper format copies of the planning application and supporting information are available on request.

- 1.5.3 All requests for hard copy information should be addressed to the following:

SEDG (Miners) Ltd
c/o Sirius Planning
4245 Park Approach
Thorpe Park
Leeds
LS15 8GB



2. THE SITE AND SURROUNDINGS

2.1 INTRODUCTION

- 2.1.1 This chapter provides a description of the application site in terms of location, history, and surrounding land uses.

2.2 LOCATION

- 2.2.1 The application site is situated within Llay Industrial Estate on an area of land measuring 701m². The site is approximately 1km to the north-west of the village of Llay and 6.5km north of Wrexham. The site is centred on approximate National Grid Reference 332516, 356390. The location of the site is shown on Drawing No. **TFE1002/01/01** and **Figure 2.1** below.

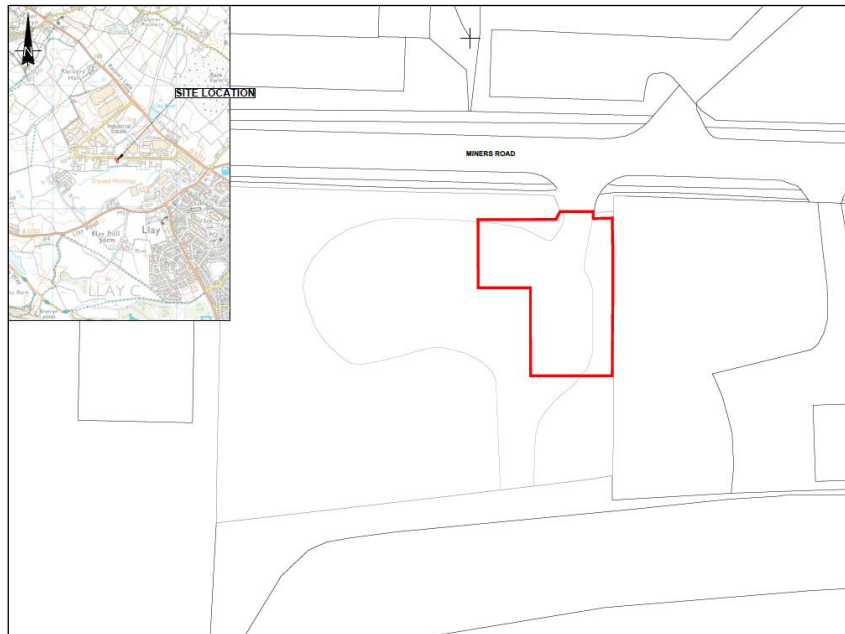


Figure 2.1: Site Location

2.3 SITE AND SURROUNDINGS

- 2.3.1 The site forms part of a plot within the Llay Industrial Estate. The industrial estate originally comprised the Llay Main Colliery which ceased operating in 1996, and was redeveloped as an industrial estate in the early 1970's.
- 2.3.2 A steel fabricating business is located within the plot to the east and a scrap merchant is located within the plot to the west of the site. Miner's Road runs adjacent to the north of the site with further industrial units beyond. To the south of the site is the colliery spoil heap and a dormant quarry operation.
- 2.3.3 The site was most recently used as a storage facility for a road haulage business. The site is no longer actively used and has been cleared. Planning permission was granted for an industrial building; however, this was never constructed, and the permission has since lapsed. The site is enclosed by fencing and scrub vegetation along the perimeter boundaries. A series of conifer trees also line the boundary to the west.
- 2.3.4 The wider site has two extant planning permissions for a Reverse Power Plant and a further extension area. The proposed EVCF will operate alongside the consented Reserve Power Plants. Separate Section 73 planning applications are being submitted to amend the site layout of these consented Reserve Power Plant.



Figure 2.2: View of Site

2.4 SITE ACCESS

- 2.4.1 Access (ingress/egress) to the EVCF site will be via the existing access point off Miners Road.

2.5 IDENTIFIED RECEPTORS

- 2.5.1 The nearest residential receptors to the application site are located approximately 520m to the south-east, beyond the B5102.
- 2.5.2 The nearest statutory ecological designation is Llay Blog SSSI located approximately 1km to the south-west of the site. There are no listed buildings or Scheduled Ancient Monuments within Llay Industrial Estate. The only historical archaeological record within the industrial estate is approximately 350m north-east of the site and relates to the Llay Main Colliery Branch Railway.
- 2.5.3 The site lies within the administrative boundaries of Wrexham County Borough Council. Under the adopted Wrexham Unitary Development Plan (2005) the site is an unallocated parcel of land within the development limits of Llay. Under the emerging Local Development Plan, the site is allocated as within an employment area.

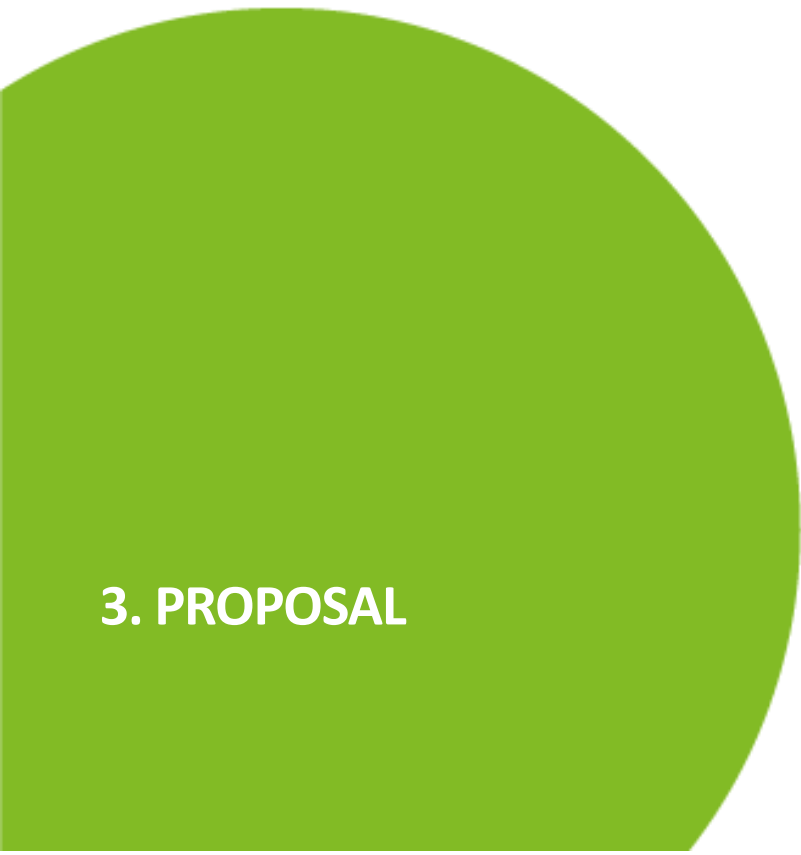
2.6 SITE PLANNING HISTORY

- 2.6.1 From using the planning application search facility on Wrexham County Borough Council's website, Table 2.1 below outlines a summary of the planning history for the application site.

Table 2.1: Site Planning History

Planning Reference	Planning Description	Date
LL 12043	Erection of microcomputer workshop and alteration to existing vehicular and pedestrian access	Application approved July 1985
LLA 17079	Erection of 7 no. industrial lettable units and construction of new vehicular and pedestrian access	Application approved August 1989
LLA 22420	Erection of Heavy Goods Vehicle Repair Shop	Application approved July 1994

P/2017/0937	Construction and operation of a Reserve Power Plant and associated infrastructure	Application approved June 2018
P/2018/0517	Extension to Reserve Power Plan and associated infrastructure	Application approved August 2018
P/2018/0784	Application for approval of details reserved by condition imposed under planning permission P/2017/0937; condition 7 (site investigation) and 11 (arboricultural method statement)	Conditions Discharged 2 nd November 2018
P/2018/0785	Application for approval of details reserved by condition imposed under planning permission P/2018/0517; condition 3 (palisade fencing), condition 5 (site investigation) and condition 8 (arboricultural method statement)	Conditions Discharged 7 th November 2018
P/2018/0797	Variation of condition 2 imposed under planning permission P/2017/0937 to allow for a revised site layout and revision to gas elevation and footprint	Application approved 16 th November 2018
P/2018/0798	Variation of condition 2 imposed under planning permission P/2018/0517 to allow for a revised site layout and revision to gas elevation and footprint	Application approved 16 th November 2018
P/2018/0873	Application for approval of details reserved by condition imposed under planning permission P/2017/0937; condition 3 (elevations of access gates), condition 12 (updated ecological assessment GCN), condition 13 (conservation management plan) and condition 14 (biosecurity risk assessment)	Conditions Discharged 17 th December 2018
P/2018/0872	Application for approval of details reserved by condition imposed under planning permission P/2018/0517; condition 9 (updated ecological assessment GCN), condition 10 (conservation management plan) and condition 11 (biosecurity risk assessment)	Conditions Discharged 17 th December 2018
P/2018/0991	Application for approval of details reserved by condition imposed under planning permission P/2018/0797; condition 3 (elevations of access gates), condition 12 (updated ecological assessment GCN), condition 13 (conservation management plan) and condition 14 (biosecurity risk assessment)	Conditions Discharged 14 th January 2019
P/2018/0992	Application for approval of details reserved by condition imposed under planning permission P/2018/0798; condition 9 (updated ecological assessment GCN), condition 10 (conservation management plan) and condition 11 (biosecurity risk assessment)	Conditions Discharged 14 th January 2019



3. PROPOSAL

3.1 INTRODUCTION

- 3.1.1 This section provides a description of the development, operational layout, equipment and structures proposed within the site.
- 3.1.2 The proposed development is for an Electric Vehicle Charing Facility with a food and drinks kiosk; the purpose to provide a new EV charging facility to meet the increasing number of EV's on the road and encourage EV use in Wrexham. Specifically, it is to provide an EVCF for users of the Llay Industrial Estate.
- 3.1.3 The wider site plot includes existing planning consents for a Reserve Power Plant including a 9.9MW (P/2018/0797) and a 9.95MW (P/2018/0798) extension. Separate Section 73 applications are being submitted to amend the site layouts of the consented Reserve Power Plant following a change in developer and to accommodate the proposal. The proposed design of the Electric Vehicle Charging Facility has been developed to co-exist with the consented Reserve Power Plant.

Background to Electric Vehicle Charging

- 3.1.4 EV's use an electric motor as their main source of propulsion, rather than a conventional engine with some vehicles storing their energy in batteries. They can be charged at home, at work or at shared service areas with the speed and availability of charging infrastructure currently being the biggest deterrent to buying an electric car.
- 3.1.5 The UK Government has introduced a number of policies and initiatives to reduce greenhouse gas emissions and cut air pollution. Powering the vehicles we drive with electricity is essential to addressing these targets. In November 2020, the Government announced the acceleration of the phasing-out of petrol and diesel cars including:
- Sales of new petrol and diesel cars and vans phased out by 2030;
 - New cars and vans to be fully zero emissions at the tailpipe from 2035;
 - Between 2030 and 2035, new cars and vans can be sold if they have the capability to drive a significant distance with zero emissions (for example, plug-in hybrids or full hybrids).
- 3.1.6 The Ten-point plan for a green industrial revolution to help the UK achieve its ambition of becoming net zero by 2050 includes EV's and states the following:
- “Electric vehicles: Backing our world-leading car manufacturing bases including in...North Wales to accelerate the transition to electric vehicles and transforming our national infrastructure to better support electric vehicles”.*
- 3.1.7 The Welsh Government has declared a Climate Emergency in Wales and has set ambitious plans for the public sector to be carbon neutral by 2030. The Wrexham Council Plan 2020-2023 (approved December 2020) sets out 6 well-being and improvement policies. A modern and environmentally responsible fleet which positions Wrexham as leaders in low carbon emissions vehicles is listed as a focus in the Plan.

Electric Vehicle Charing Points

- 3.1.8 EV charging points are vital infrastructure in facilitating the transition to EV's and securing net zero carbon targets. A good supply and distribution of charging points is essential to encourage more drivers to purchase EV's and use them on a day-to-day basis. Specifically locating charging points on industrial estates, business parks and arterial routes such as the proposed location, will ensure EV drivers can travel with confidence that they can recharge when required, whilst also having the required welfare facilities available. Thus, making electric cars and vans an attractive alternative to conventional fossil fuelled vehicles.
- 3.1.9 There needs to be certainty that there is EV charging networks ready to meet the long-term consumer demand for EV charge points ahead of need. By 2030, the UK government expects the network to be

extensive and ready for more people to benefit from the switch to electric cars. The proposed development will help meet the above targets.

3.2 PROPOSED LAYOUT

3.1.10 The proposed Electric Vehicle Charging Facility, as shown on **Figure 3.1** below and Drawing No. **TFE1002/01/03** will consist of:

- 10 EV charging bays including two disabled bays;
- 10 EV charging points;
- Food and Drinks Kiosk measuring 3m x 10m x 3m;
- 2 staff parking bays; and
- Bin storage area

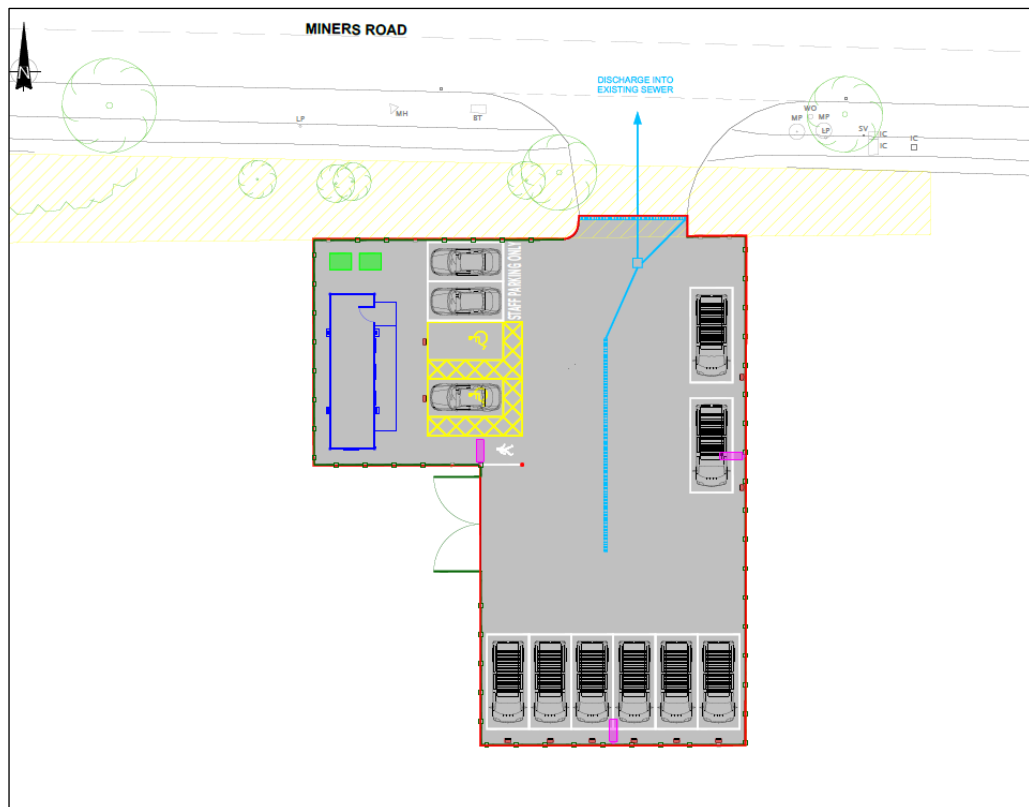


Figure 3.1: Site Layout

3.1.11 The proposed service area will comprise 10 EV charging points and 10 associated parking bays, two of which are disabled parking bays. The location of the charging points are identified on Drawing No. TFE1002/01/03. The charging points are 1.4m in height, **Figure 3.2** and Drawing No. **TFE1002/01/05** provides the charging point details.

3.1.12 The required size of an EV parking space is driven by the fact that there is no standardised location for charging port position on an EV. Therefore, to enable EV's of all shapes and sizes to comfortably charge, the EV parking bays are generally wider than a standard parking bay. Given the location of the site on a well-used industrial estate, the parking bays have been designed to accommodate commercial EV vans and light goods vehicles, typical in the area. The charging bays measure 6 metres x 2.75 metres and each will be serviced by a dedicated charging point post.

3.1.13 Due to the increased time spent by EV charge customers, a kiosk building is also proposed containing an internal waiting area, small kitchen for the service of refreshments and toilets. Drawing No.

TFE1002/01/04 illustrates the kiosk elevations. The kiosk will be a typical modular prefabricated building, coloured grey. It is anticipated that there will be two staff members working at the kiosk, at any one time and therefore two staff parking spaces have also been provided on site.



Figure 3.2: Electric Vehicle Charging Point Details

Operating Hours

- 3.1.14 It is envisaged that the EV charging points will be available to access 24/7. The kiosk will open 7am – 7pm.

Lighting

- 3.1.15 Several column mounted downward facing LED lights will be located across the EVCF area as shown on Drawing No. **TFE1002/01/03**.

Drainage

- 3.1.16 The EVCF will be surfaced with a conventional tarmac product, typical of car parks. A channel drain will be located within the centre of the parking area and across the site access, for the collection of surface water run, which will connecting to a drainage interceptor before being discharged into the existing sewer. Drawing No. **TFE1002/01/03** illustrates the proposed drainage design.

Site Security

- 3.1.17 The wider plot of land will be secured by a consented 2.4m paladin perimeter fencing under planning permission P/2018/0797. The EVC area will be separated from the consented Reserve Power Plant by an additional 2.4m paladin fencing between the developments, as shown on Drawing No. **TFE1002/01/03**. Details of the fencing are shown on Drawing No. **TFE1002/01/06**.
- 3.1.18 Infra-red (non-visible at night), inward facing pole mounted CCTV cameras (2.5m in height) will also be provided at appropriate intervals along the boundary fence. These will enable remote surveillance of the site. The CCTV cameras will be positioned to avoid views of private property.

Site Access

- 3.1.19 Access and egress to and from the site will utilise the existing site access point off Miners Road which serves Llay Industrial Estate.
- 3.1.20 The existing access point will be shared by both the EVCF and the consented Reserve Power Plant development. The consented access gate for planning permission P/2018/0797 has been re-located to the new entrance of the Reserve Power Plant.

Construction Period

- 3.1.21 Due to the minimal work on site, the overall construction period for the proposal will be approximately 4-6 weeks.
- 3.1.22 It is anticipated that the adjacent consented Reserve Power Plant will be constructed prior to the EV charging area and therefore there should be minimal impact on either facility.



4. ENVIRONMENTAL CONSIDERATIONS

4.1 INTRODUCTION

- 4.1.1 This chapter sets out and briefly summarises the environmental topics that have been considered in support of this planning application.

4.2 SPECIFIC ENVIRONMENTAL CONSIDERATIONS

Noise

- 4.2.1 The site is located on a well-established industrial estate with the nearest residential receptors being 520m to the south-east, beyond the B5102.
- 4.2.2 No noise is emitted from the proposed charging infrastructure which would cause adverse impacts. In addition, the site will be used by EV's which are quiet vehicles, with significant amenity and environmental benefits.

Traffic

- 4.2.3 The proposal, in terms of the principle of use, is supported at all levels from a transport perspective with the introduction of EV infrastructure to support the growth of EV usage.
- 4.2.4 It is anticipated that cars, commercial vans and light goods vehicles already accessing the Llay Industrial estate area will use the proposed facility. The parking bays have been designed to accommodate commercial electric vans typically used on the industrial estate to help assist in increasing the uptake of EV usage.
- 4.2.5 Vehicle charging times will depend on the type of vehicle and the rate of charging to be applied. i.e. super/ultra-rapid charging - typical full charge time of <30 minutes; rapid charging, typical full charge time of > 30 minutes; standard charging – typical charge period of >1 hour.
- 4.2.6 Based on a super/ultra-rapid charging time speed (fastest), each bay could generate a theoretical maximum of three, two-way vehicle movements an hour. Assuming 100% occupancy of the 10 vehicle bays, the EVCF could generate up to a maximum of 30 one way movements either in or out of the site per hour it fully utilised. It should be noted that this would be the worst case scenario.
- 4.2.7 It is considered that traffic generation from the proposal will not have a significant impact on the local highway and will be utilised in the main by vehicles already using Llay Industrial Estate.

Flood Risk & Surface Water Drainage

- 4.2.8 The site is located within Flood Zone A and is not at risk from flooding. In addition, the site is below 1ha in size and therefore a Flood Risk Assessment is not considered required.
- 4.2.9 The application site will be surfaced with tarmac, with falls to a channel drain in the centre of the parking area and across the site entrance. The drain will connect to an interceptor before being discharged into the existing sewer. Drawing No. **TFE1002/01/03** illustrates the proposed drainage design.

Ecology

- 4.2.10 Much of the wider site comprises habitats of negligible to low ecological value including hardstanding and bare ground devoid of vegetation. Under planning permission P/2018/0797 for the adjacent Reserve Power Plant, a working area for the site was defined and ecology mitigation, in the form of a Great Crested Newt mitigation strategy, was previously agreed.
- 4.2.11 The development only proposes to utilise part of the site within the existing defined working areas and therefore, the proposed development would have no additional impact on ecology and biodiversity, there is no further requirement for mitigation to that already identified and agreed with Natural Resource Wales.

Landscape and Visual

- 4.2.12 The proposal is located on an established industrial estate within an immediate surrounding brownfield context. Landscape effects are not considered at the site given its location, and the adjoining industrial land uses which extend out to c. 250m and given the minimal nature and scale of the proposed development.
- 4.2.13 The development is considered appropriate to the industrial areas setting in terms of the design criteria and will provide a visual improvement given the current derelict condition of the site.

Cultural Heritage

- 4.2.14 The proposal is located on a plot of land within Llay Industrial Estate. There are no Listed Buildings or Scheduled Ancient Monuments within the industrial estate. The only historical archaeological record within the industrial estate is 350m north-east of the site and relates to the Llay Main Colliery Branch Railway. Given the separate distance between the site and any historic designations and the existing surrounding industrial area, the proposed EVCF facility is unlikely to cause impact upon archaeology and cultural heritage features.



5. PLANNING POLICY AND MATERIAL CONSIDERATION CONTEXT

5.1 INTRODUCTION

- 5.1.1 This section sets out the planning policies and material considerations, which are relevant both to the site and the type of development proposed, giving consideration to national and local planning policy. Section 38 of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the provisions of the Development Plan.
- 5.1.2 Given the primacy of the development plan in the decisions-making process, this planning statement identifies and summarises those planning policies of relevance to the determination of the planning application.
- 5.1.3 In addition to local planning policy, this section of the planning statement also summarises the material considerations at a national and local level.

5.2 LOCAL PLANNING POLICY

- 5.2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the provisions of the adopted Development Plan unless material considerations indicate otherwise. The proposed development site falls within the administrative boundaries of Wrexham County Borough Council. The adopted Development Plan comprises:

- Wrexham Unitary Development Plan (adopted 2005).

Wrexham Unitary Development Plan

- 5.2.2 The Wrexham Unitary Development Plan was adopted in February 2005 and provides guidance as to the Council's policies, forming the basis against which all development proposals in the county are decided.
- 5.2.3 Under the adopted plan, the application site is an unallocated parcel of land within the development limits of Llay.
- 5.2.4 The following table provides an assessment of policies within the Wrexham Unitary Development Plan which are considered relevant to the proposal.

Table 5.1 – Policy Appraisal – Policies from the Wrexham Unitary Development Plan

Policy	Commentary
<u>Policy PS1 – The Broad Location of Development</u> <i>“New development for housing, employment and community services will be directed to within defined settlement limits/employment areas”.</i>	The proposed development is for an Electric Vehicle Charging Facility located within the Llay development limits. The proposed development is therefore in accordance with this policy.
<u>Policy PS2 – The Broad Location of Development</u> <i>“Development must not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment”.</i>	The application site is located within the Llay Industrial Estate. The development is appropriate to the industrial areas setting in terms of design criteria and given the minimal nature of the proposed works, it is considered that the development will not have any detrimental effects on the quality of the environment. The proposed development is therefore in accordance with this policy.
<u>Policy PS3 – The Broad Location of Development</u>	The proposed development is located on a brownfield site, a former storage facility for a road haulage business with the wider plot having extant

<i>"Development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land..."</i>	planning permission for a Reserve Power Plant (RPP). The proposal has been designed to co-exist with the consented RPP on site. The proposed development is therefore in accordance with this policy.
<u>Policy PS4 - The Broad Location of Development</u> <i>"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."</i>	The application site is located within the Llay Industrial Estate within the Llay development limits. The development is considered appropriate to the industrial areas setting and will provide much needed infrastructure to help facilitate the transition to EV's. The proposed development is therefore considered to be in accordance with this policy.
<u>Policy PS8 – Transport</u> <i>"The transport network will be developed by providing an integrated range of travel options..."</i>	The proposal will help to encourage the use of EV's in the region providing much needed infrastructure contributing to a reliable and comprehensive network of charging stations. The development will help facilitate the transition to EV's following the acceleration of the phasing-out of petrol and diesel cars and securing net zero carbon targets. The proposed development is therefore considered to be in accordance with this policy.
<u>Policy GP1 – General Development Principles</u> <i>"All new development should: -</i> <i>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.</i> <i>b) Take account of personal and community safety and security in the design and layout of development and public / private spaces.</i> <i>c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources.</i> <i>d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality...</i> <i>f) Ensure the safety and amenity of the public and safeguard the environment from adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour of vibration arising from development</i> <i>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>	The development is considered to be appropriate to the industrial areas setting and would provide a visual improvement given the current derelict condition of the site. The development will provide the necessary infrastructure to help facilitate the transition to EV's following the acceleration of the phasing-out of petrol and diesel cars and securing net zero carbon targets. The proposal will use the existing site access off Miners Road within the industrial estate. This existing access is anticipated to be shared with the consented RPP with the RPP only requiring minimal maintenance movements once operational. It is considered that the proposal would not have a significant impact on the existing highway network. The location of the charging points has been designed to enable sufficient room for vehicles to manoeuvre around the site including maintenance vans associated with the adjacent RPP. No noise is emitted by the proposed charging infrastructure which would cause adverse impacts. In addition, the site will be used by EV's which are quiet vehicles with significant amenity and environmental benefits. Much of the site comprises habitats of negligible to low ecological value including hardstanding and

<i>i) Ensure that development does not result in, or is subject to, flooding..."</i>	bare ground devoid vegetation. Under planning permission P/2018/0797 for the consented RPP, a working area for the site was defined which included the proposed EV charging area and ecology mitigation, in the form of a GCN mitigation strategy, was agreed. The proposed development only proposes to install equipment within the existing defined working areas of the site and therefore the proposal would have no additional impact on ecology and biodiversity and there is no further requirement for mitigation to that identified and agreed with Natural Resource Wales under the adjacent consented RPP. The application site is in Flood Zone A and is not at risk from flooding. The proposal is therefore considered to be in accordance with this policy.
<u>Policy EC4 – Hedgerows, Trees and Woodland</u> <i>"Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features..."</i>	No trees or hedgerows are to be removed to facilitate the proposed development of the site. The proposal is therefore considered to be in accordance with this policy.
<u>Policy EC6 – Biodiversity Conservation</u> <i>"Development either within or close to sites of biodiversity interest will only be permitted where it can be clearly demonstrated that the need for the development outweighs the need to safeguard the intrinsic nature conservation value of the site. Where such development is permitted, damage should be kept to a minimum, and compensatory measures should be provided. Measures to improve the biodiversity value of sites and enhance their natural conservation interest and landscape quality including the establishment of local nature reserves, will be supported".</i>	Given the nature of the development and its distance from any designated ecological sites, the proposals are unlikely to generate any adverse impacts on designated feature. Much of the site comprises habitats of negligible to low ecological value including hardstanding and bare ground devoid vegetation. Under planning permission P/2018/0797 for the consented RPP, a working area for the site was defined which included the proposed EV charging area and ecology mitigation, in the form of a GCN mitigation strategy, was agreed. The proposed development only proposes to install equipment within the existing defined working areas of the site and therefore the proposal would have no additional impact on ecology and biodiversity and there is no further requirement for mitigation to that identified and agreed with Natural Resource Wales under the adjacent consented RPP. The proposed development is therefore considered to be in accordance with this policy.
<u>Policy EC13 – Surface Water Run-Off</u> <i>"Development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted".</i>	The application site will be surfaced with tarmac. Given the size of the site, local hydrology will not be materially affected. A channel drain is proposed within the centre of the parking area and the site access connecting to a proposed drainage interceptor before being discharged into the existing sewer. Drawing No. TFE1002/01/03 illustrates the proposed drainage design.

	The proposed development is therefore considered to be in accordance with this policy.
<u>Policy S6 – Local Need Shopping</u> <i>“Small scale shopping development will be allowed within settlement limits provided that: -</i> <i>a) the development is safely accessible for customers on foot;</i> <i>b) the development does not harm residential amenity and / or does not give rise to traffic problems e.g. on-street parking that cannot be addressed;</i> <i>c) the sale floor area of each development does not exceed 300 square meters”.</i>	The proposed development is for an Electric Vehicle Charging Facility located within the Llay development limits. Due to the increased time spent by EV charge customers, a kiosk is proposed as part of the development containing an internal waiting area, small kitchen for the service of refreshments and toilets. The kiosk has an internal floorspace of 30m². The application site is located within a well-established Industrial Estate, and it is not considered that traffic generation from the proposal will have a significant impact on the local highway. The proposed development is therefore considered to be in accordance with this policy.
<u>Policy T8 – Parking</u> <i>“Development granted planning permission will be required to provide vehicle parking spaces...”.</i>	The proposal is for an Electric Vehicle Charging Facility comprising 10 charging points and associated bays including two disabled bays. The proposal is in alignment with the necessary expansion of green infrastructure as identified in the Wrexham Council plan (2020-2023) and will provide a low carbon refuelling facility which will help meet the UK’s legally binding target to a net zero 2050. The proposed development is therefore considered to be in accordance with this policy.

5.3 MATERIAL CONSIDERATIONS

Planning Policy Wales (Edition 11, February 2021)

5.2.5 In February 2021, the Welsh Government (WG) published an update to national planning policy in the form of the 11th edition of Planning Policy Wales (PPW). PPW sets out the land use planning policies of the WG.

5.2.6 PPW confirms that the planning system should support the transition to a low carbon future in a changing climate. Section 4.1 relates to sustainable transport. Paragraph 4.1.40 states that

“To encourage the use of Ultra Low Emissions Vehicles (ULEVs), the planning system should encourage and support the provision of ULEV charging points...”

5.2.7 Paragraph 6.7.8 also states that the planning system should ensure that

“...progress towards a shift to low or zero emissions means of road transport, such as electric charging points...”.

Future Wales: The National Plan 2040

5.2.8 Future Wales: The National Plan 2040 (adopted February 2021) is the national plan that sets out the direction of development in Wales to 2040.

5.2.9 Page 86 and 87 of the National Plan relates to the transition to low emission vehicles and states the following:

“The Welsh Government will embrace the adoption of electric vehicles in an inclusive manner, supported by the necessary investment in charging infrastructure...”

Battery electric vehicles currently offer the most immediate route to the transition away from petrol and diesel vehicles to zero and ultra-low emission vehicles. It is important that we plan and deliver the infrastructure, and in particular the charging infrastructure, that electric vehicles will rely on. We expect business and industry to drive much of the roll-out of charging infrastructure...

The Welsh Government will set out how we will support the uptake of electric vehicles in our Electric Vehicle Charging Strategy. We will also keep under review the pace and geography of the delivery of charging infrastructure and ensure that no parts of Wales are left behind in this transition...

Planning authorities should take a strategic approach to electric vehicle charging in their area and, where appropriate, develop policies in their development plan and specific local requirements...”

5.2.10 Policy 11 of the National Plan relates to National Connectivity and states that:

“The Welsh Government will support and invest in improving national connectivity. Our priorities are to encourage longer-distance trips to be made by public transport, while also making longer journeys possible by electric vehicles. The Welsh Government will work with Transport Wales, local authorities, operators and partners to support the delivery of the following measures to improve national connectivity ...

- *Strategic road network ... create a network of rapid charging points to enable longer distance travel by electric vehicles throughout Wales...”*

Planning authorities should support developments associated with improvements to national connectivity and, where appropriate, maximise the opportunities that arise from them...”

5.2.11 Policy 12 of the National Plan relates to Regional Connectivity and states that:

“The Welsh Government will support and invest in improving regional connectivity...In rural areas out priorities are supporting the uptake of ultra-low emission vehicles...

The Welsh Government will work with Transport for Wales, local authorities, operators and partners to deliver the following measures to improve regional connectivity: ...

- *Ultra-Low Emissions Vehicles – support the roll-out of suitable fuelling infrastructure to facilitate the adoption of ultra-low emission vehicles, particularly in rural areas...”*

5.2.12 The proposed development is for an Electric Vehicle Charging Facility located within Llay Industrial Estate. The proposal is considered to be supported at all levels from a transport perspective with the introduction of EV infrastructure to support the growth of EV usage and contribute to the establishment of the countryside EV recharging infrastructure.

5.2.13 The proposal provides the necessary infrastructure to help facilitate the transition to EV's following the acceleration of the phasing-out of petrol and diesel cars and securing net zero carbon targets. The parking bays are large enough for commercial electric vans typically used on the industrial estate to help assist in increasing the uptake of EV usage in the local area.

Emerging Wrexham Local Development Plan 2

5.2.14 Wrexham Council are currently producing the Wrexham Local Development Plan 2 which, once adopted, will replace the current Unitary Development Plan. The Emerging Plan was submitted to the Welsh Government and PINS in November 2018 and is currently undergoing examination.

5.2.15 Under the emerging Proposals Map the site is allocated as within an Employment Area.

5.2.16 The following table provides an assessment of policies within the emerging Wrexham Local

Development Plan 2 which are considered relevant to the proposal.

Table 5.2 – Policy Appraisal – Policies from the Emerging Wrexham Local Development Plan 2

Policy	Commentary
<u>Policy SP2: Location of Development</u> <i>“New development is directed to the defined settlement limits and employment areas as identified on the Proposals Map”.</i>	The proposed development is for an Electric Vehicle Charging Facility located within the Llay Industrial Estate employment area. The proposed development is therefore in accordance with this policy.
<u>Policy SP12: Transport and Accessibility</u> <i>“Wrexham’s transport network will be developed in a safe, efficient and sustainable manner through the following measures: ...</i> <i>iii. Enhance the overall reliance of the network and take steps to adapt the transport network to the effects of climate change ...”.</i>	The proposal will help to encourage the use of EV’s in the region providing much needed infrastructure contributing to a reliable and comprehensive network of charging stations. The development will help facilitate the transition to EV’s following the acceleration of the phasing-out of petrol and diesel cars and securing net zero carbon targets. The proposed development is therefore considered to be in accordance with this policy.
<u>Policy SP15: Natural Environment</u> <i>“Development will only be supported where it protects, conserves and enhances the natural environment...”</i>	Given the nature of the development and its distance from any designated ecological sites, the proposals are unlikely to generate any adverse impacts on designated feature. Much of the site comprises habitats of negligible to low ecological value including hardstanding and bare ground devoid vegetation. Under planning permission P/2018/0797 for the consented RPP, a working area for the site was defined which included the proposed EV charging area and ecology mitigation, in the form of a GCN mitigation strategy, was agreed. The proposed development only proposes to install equipment within the existing defined working areas of the site and therefore the proposal would have no additional impact on ecology and biodiversity and there is no further requirement for mitigation to that identified and agreed with Natural Resource Wales under the adjacent consented RPP. The proposed development is therefore considered to be in accordance with this policy.
<u>Policy SP16: Historic and Cultural Environment</u> <i>“Development will only be supported where it conserves, protects and enhances the following cultural heritage assets of the County Borough and, where appropriate, their settings:</i> <i>i. Listed Buildings...</i> <i>v. Scheduled Ancient Monuments and Archaeological Remains”.</i>	The proposal is located on a plot of land within Llay Industrial Estate. There are no Listed Buildings or Scheduled Ancient Monuments within the industrial estate. The only historical archaeological record within the industrial estate is 350m north-east of the site and relates to the Llay Main Colliery Branch Railway. Given the separate distance between the site and any historic designations and the existing surrounding industrial area, the proposed EV charging facility is unlikely to cause impact upon archaeology and cultural heritage features.

	The proposed development is therefore considered to be in accordance with this policy.
<u>Policy SP19: Climate Change</u> <i>“To mitigate against the effects of climate change and adapt to its impacts, development proposals will need to demonstrate that they have taken into account the following:</i> <i>i. Reducing carbon emissions ...</i> <i>iv. Promoting energy efficiency and increasing the supply of renewable energy ...</i> <i>vii. Preventing development that increases flood risk...”.</i>	The proposal provides the necessary infrastructure to help facilitate the transition to EV’s following the acceleration of the phasing-out of petrol and diesel cars and securing net zero carbon targets and reducing air pollution. The application site is located within Flood Zone A and is not at risk from flooding. The proposed development is therefore considered to be in accordance with this policy.
<u>Policy DM1: Development Management Considerations</u> <i>“Development proposals, where relevant, must:</i> <i>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</i> <i>(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 ...</i> <i>e) Be safely and conveniently accessible for all potential users/occupiers of the development...</i> <i>f) Not give rise to parking or highway safety problems on site or in the locality ...</i> <i>h) Contribute to low carbon communities through energy efficiency...</i> <i>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...”</i>	The development is considered to be appropriate to the industrial areas setting and would provide a visual improvement given the current derelict condition of the site. No noise is emitted by the proposed charging infrastructure which would cause adverse impacts. In addition, the site will be used by EV’s which are quiet vehicles with significant amenity and environmental benefits. The proposal will use the existing site access off Miners Road within the industrial estate. This existing access is anticipated to be shared with the consented RPP with the RPP only requiring minimal maintenance movements once operational. It is considered that the proposal would not have a significant impact on the existing highway network. The location of the charging points has been designed to enable sufficient room for vehicles to manoeuvre around the site including maintenance vans associated with the adjacent Reserve Power Plant. The development will provide the necessary infrastructure to help facilitate the transition to EV’s following the acceleration of the phasing-out of petrol and diesel cars and securing net zero carbon targets. The application site is in Flood Zone A and is not at risk from flooding. The application site will be surfaced with tarmac. Given the size of the site, local hydrology will not be materially affected. A channel drain is proposed within the centre of the parking area and the site access connecting to a proposed drainage interceptor before being discharged into the existing sewer. Drawing No. TFE1002/01/03 illustrates the proposed drainage design. The proposal is therefore considered to be in accordance with this policy.
<u>Policy NE3: Trees, Woodlands and Hedgerows</u>	No trees or hedgerows are to be removed to facilitate the proposed development of the site.

<i>"Development will only be permitted where it does not cause unacceptable harm to trees, woodlands and hedgerows..."</i>	The proposal is therefore considered to be in accordance with this policy.
<u>Policy EM1: Protection of Existing Employment Land</u> <i>"The County Borough's existing employment areas as shown on the Proposals Map will be protected for B Use Class employment generating uses...</i> <i>2. Llay Industrial Estate, Llay..."</i>	The proposed development is for an Electric Vehicle Charging Facility located within the Llay Industrial Estate employment area. The wider site has planning permission for a Reserve Power Plant. The proposal has been designed to co-exist with the Reserve Power Plant. The proposal provides the necessary infrastructure to help facilitate the transition to EV's following the acceleration of the phasing-out of petrol and diesel cars and securing net zero carbon targets. The parking bays are large enough for commercial electric vans typically used on the industrial estate to help assist in increasing the uptake of EV usage. The proposal is therefore considered to be in accordance with this policy.
<u>Policy EM2: Provision of Supporting Facilities for Employees in Business, Industrial and Warehousing Developments</u> <i>"Provision for...food and drink... facilities will be appropriate in the employment areas shown on the proposals map, provided:</i> <i>i. the facility is of an appropriate size and scale and is subordinate in its nature to meet the needs of workers in the vicinity and does not result in an over concentration of such facilities in one area;</i> <i>ii. the proposal does not impact on the status and character of the employment area for B1, B2 or B8 uses;</i> <i>iii. the operations of other industrial and employment uses in the vicinity of the site would not be adversely affected, and</i> <i>iv. the proposal would not result in significant levels of visitor traffic into the area, or exacerbate existing traffic conditions".</i>	Due to the increased time spent by EV charge customers, a kiosk is proposed as part of the development containing an internal waiting area, small kitchen for the service of refreshments and toilets. The kiosk has an internal floorspace of 30m². The application site is located within a well-established industrial estate. It is anticipated that commercial vans already operating in the area will use the proposed facility. Therefore, it is not considered that traffic generation from the proposal will have a significant impact on the local highway. The proposed development is therefore considered to be in accordance with this policy.
<u>Policy EM3: Alternative Use of Employment Land and Premises</u> <i>"Development of business, industrial and warehousing land and premises for other uses will only be permitted if:</i> <i>i. The land or premises are no longer well located for business, industrial and warehousing uses; or</i> <i>ii. There is no realistic prospect of employment use on the site and/or the property is physically unsuitable for employment use, even after adaption/refurbishment or redevelopment; or</i> <i>iii. There is no need to retain the land or premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the</i>	The wider site has planning permission for a RPP. The proposal has been designed to co-exist with the RPP. It is anticipated that commercial vans already operating in the area will use the proposed facility. The development will help facilitate the transition to EV's following the acceleration of the phasing-out of petrol and diesel cars and securing net zero carbon targets. Given the scale and nature of the proposal, there is not considered to be any adverse effect on identified receptors and the development is an acceptable proposal in this location. The proposed development is therefore considered to be in accordance with this policy.

<i>requirement to provide for a range and choice of sites available for such use; and</i> <i>iv. There will be no unacceptable impact on the operating conditions of existing businesses”.</i>	
<u>Policy T1: Managing Transport Impacts</u> <i>“Proposals for new development will be supported where they:</i> <i>i. Facilitate increased journeys by more sustainable modes of travel...</i> <i>iii. 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;</i> <i>iv. Provide appropriate levels of parking and ensure access arrangements for the site to allow for safe manoeuvring...”</i>	The proposal will help to encourage the use of EV’s in the region providing much needed infrastructure contributing to a reliable and comprehensive network of charging stations. The proposal will use the existing site access off Miners Road within the industrial estate. This existing access is anticipated to be shared with the consented RPP with the RPP only requiring minimal maintenance movements once operational. It is considered that the proposal would not have a significant impact on the existing highway network. The location of the charging points has been designed to enable sufficient room for vehicles to manoeuvre around the site including maintenance vans associated with the adjacent RPP. The proposed development is therefore considered to be in accordance with this policy.
<u>Policy R6: Retail Development (Edge and Out of Centre)</u> <i>“Retail development will only be permitted outside Wrexham Town Centre, District, Local, Village and Neighbourhood Centres if:</i> <i>i. There is a need for the proposed floor space (with precedence accorded to establishing quantitative need) and,</i> <i>ii. That the need cannot satisfactorily be accommodated within or adjacent to Wrexham Town Centre, a District, Local, Village or Neighbourhood Centre, and</i> <i>iii. The proposal would not cause unacceptable harm to the vitality, attractiveness or viability of Wrexham Town Centre, a District, Local, Village or Neighbourhood Centre, and</i> <i>iv. The site is accessible by a choice of means of transport, or</i> <i>v. The proposal is for small scale retail development with a floor-space of 100m² or less meeting local needs”.</i>	Due to the increased time spent by EV charge customers, a kiosk is proposed as part of the development containing an internal waiting area, small kitchen for the service of refreshments and toilets. The kiosk has an internal floorspace of 30m². The application site is located within a well-established Industrial Estate and it is not considered that traffic generation from the proposal will have a significant impact on the local highway. The proposed development is therefore considered to be in accordance with this policy.

Conclusions

- 5.2.17 The proposed development accords with national and local policy and supported at all levels from a transport perspective with the introduction of EV infrastructure to support the growth of EV usage. It is therefore considered that the proposal should be granted planning permission.



6. SUMMARY & CONCLUSIONS

6.1 INTRODUCTION

- 6.1.1 This Planning Statement has been prepared by Sirius Planning on behalf of SEDG (Miners) Ltd (an SPV of Terra Firma Energy) in support of an application for planning permission for an Electric Vehicle Charging Facility, including a food and drinks kiosk, on land to the south of Miners Road, Llay Industrial Estate, Wrexham.
- 6.1.2 The wider site plot includes existing planning consents for a Reserve Power Plant including a 9.9MW (P/2018/0797) and a 9.95MW (P/2018/0798) extension. Separate Section 73 planning applications are being submitted to amend the site layout of the consented Reserve Power Plant to accommodate the EVCF. The proposed design of the Electric Vehicle Charging Facility has been developed to co-exist with the consented Reserve Power Plant.
- 6.1.3 The EV sector is critical in order to achieve the UK Government's commitment to net zero emissions and schemes such as the proposed are key to addressing concerns regarding availability of charging infrastructure.
- 6.1.4 The proposed development provides the necessary charging infrastructure to assist in efforts to materially accelerate the rate of installation of public EV charging points which is necessary to facilitate the ban on sales of new petrol and diesel cars in 2030. The proposal aligns fully with Government policies and initiatives and will help facilitate the transition to EV's following the acceleration of the phasing-out of petrol and diesel cars and securing net zero carbon targets.

6.2 ENVIRONMENTAL EFFECTS

- 6.1.5 Given the location of the application site, it is considered that the proposal will create no significant environmental effects either locally or upon the wider area due to its scale and nature of the surrounding area.

6.3 PLANNING POLICY

- 6.1.6 The proposal has been considered in the context of national, and local policies and any other material considerations. The application site is located to the south of Miners Road on a brownfield plot within the Llay Industrial Estate with the wider site having planning consent for a Reserve Power Plant.
- 6.1.7 The proposal has been considered against both nationally and local relevant planning policy and is considered to be in accordance. Furthermore, material considerations in the form of the Planning Policy Wales weigh heavily in favour of the development.

6.4 SUMMARY

- 6.1.8 The proposal has been considered against relevant planning policy and is considered to be in accordance.
- 6.1.9 This planning statement confirms that the proposed Electric Charging Facility on land off Miners Road will not lead to any significant impacts, and the proposal should be supported.

