

Caulmert Limited

Engineering, Environmental & Planning
Consultancy Services

M & L INVESTMENT PARTNERS LLP

PROPOSED EXTENSION TO APPROVED WAREHOUSE.

ABBEY ROAD, WREXHAM INDUSTRIAL ESTATE, WREXHAM.

SUPPORTING PLANNING STATEMENT

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Doc ref: 3523-CAU-XX-XX-RP-T-0300.A0-C1

August 2018

APPROVAL RECORD

Site: Abbey Road, Wrexham Industrial Estate.

Client: M&L Investment Partners LLP

Project Title: Proposed Extension to Approved Warehouse.

Document Title: Supporting Planning Statement

Document Ref: 3523-CAU-XX-XX-RP-T-0300.A0-C1

Report Status: **FINAL**

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TABLE OF CONTENTS

	Page
1 INTRODUCTION	2
2 DESCRIPTION OF THE APPLICATION SITE	3
3 RECENT PLANNING HISTORY OF THE SITE	5
4 THE PROPOSED DEVELOPMENT	6
5 THE DEVELOPMENT PLAN	9
6 OTHER MATERIAL CONSIDERATIONS	12
7 REVIEW OF THE PLANNING ISSUES	14
8 CONCLUSIONS	20

1. INTRODUCTION

Background

- 1.1 Caulmert Ltd has been appointed by M&L Investment Partners LLP, to submit a full planning application, to extend the recently approved warehouse building,
- 1.2 Planning application Ref: P/2017/1013 granted planning permission for the ***“erection of Industrial Warehouse (Use Class B1, B2 and B8) with associated service yard and car parking”***, and was approved on 24 January 2018.
- 1.3 This Statement relates to an application for full planning permission to provide a three bay extension to the north west of the recently approved warehouse building, which is currently under construction at the site.
- 1.4 The approved warehouse building has a floor area of 2,892sq.m, together with office accommodation, located to the front, over two floors amounting to 508sq.m.
- 1.5 The proposed development will create an additional 846sq.m of warehouse floor space, which will enable the company to improve efficiency, make better use of the site and safeguard employment.
- 1.6 The full site address of the site is 2 Elm Point, Abbey Road North, Wrexham Industrial Estate, Wrexham. LL13 9UE. It is located within the administrative area of Wrexham County Borough Council.

2. DESCRIPTION OF THE APPLICATION SITE

- 2.1 The site is located within the Redwither Business Park, which forms part of the Wrexham Industrial Estate, the largest of 25 industrial estates in the area, which is the largest in Wales and amongst the top 10, by size in the UK. Wrexham industrial estate is a central location for manufacturing, storage and distribution. The industrial estate is located on the eastern outskirts of the town approximately 7.25km from the town centre.
- 2.2 The development site forms a small part of the previous application site, which measures approx. 0.38 acres (0.15ha). It lies to the east of Abbey Road, to the north east of the Industrial estate. Access to the site is already provided and is taken from Elm Road, which serves both the Clwydian Group building, located directly south of the site, and the subject industrial building.
- 2.3 The approved warehouse development is currently under construction and comprises a large modern industrial building, which will be used for storage, haulage and distribution services. The building measures approx. 78m in length by 39m in width, with a height of 18.5m to the eaves. This will allow for tall racking to be utilised within the building.
- 2.4 The application site presently comprises a cleared site, following the demolition of previous smaller buildings, which lies directly adjacent to the current development site for the approved warehouse building.
- 2.5 The recently constructed Clwydian Group building is finished in olive green plastic coated steel sheeting, with large areas of grey contrasting paneling. The height of the building measures approx. 11m to the parapet. The Kellogg's building to the rear measures a height of approx. 30m.
- 2.6 The site benefits from good public transport links with stops for the 1E, 41A and 42 services nearby, providing regular services to Wrexham and its surrounds, from where a number of services run to the wider area, including links to national rail stations.
- 2.7 Given that the site lies within the Redwither Industrial Complex, within the Wrexham Industrial Estate, the site is surrounded by a number of industrial uses.



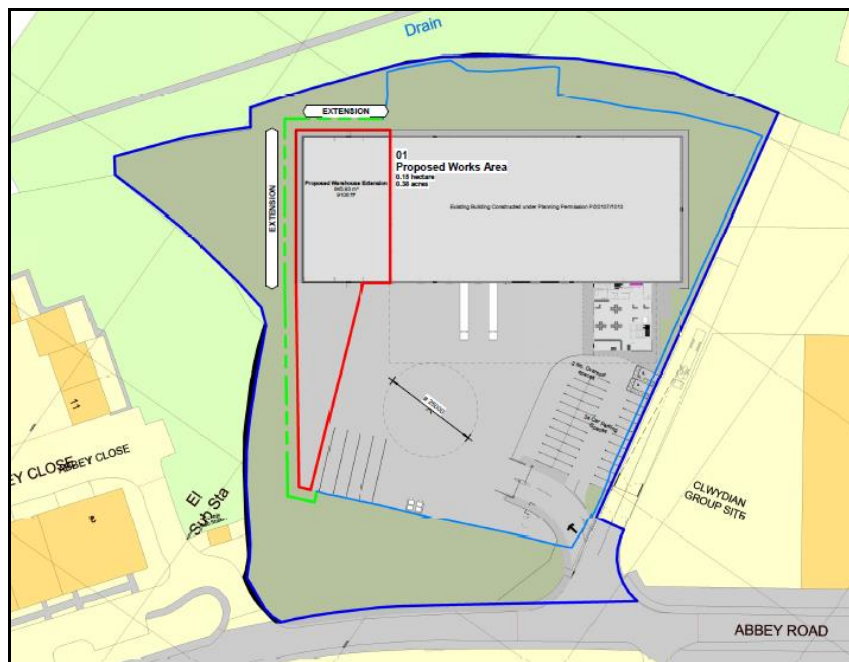
Google Extract – Application site shown red.

3 RECENT PLANNING HISTORY OF THE SITE

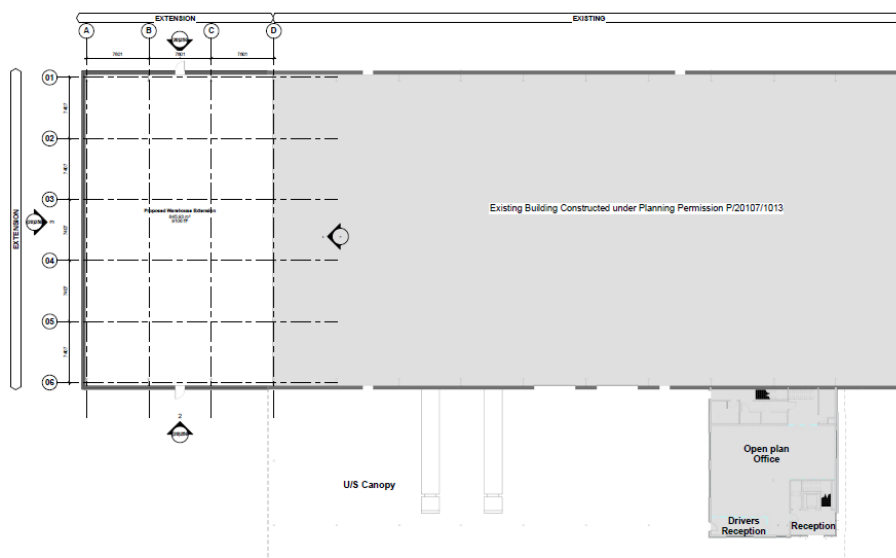
- 3.1 Planning permission for the erection of a single storey unit to provide 5,348 sq.m of Industrial Floorspace (B2 and B8) with 1,299 sq.m ancillary office space (B1) for Clwydian Group was approved 11 January 2016 (Application Ref P/2015/0886). The application included the creation of one new access and works to amend the existing access. This site has now been constructed and is fully operational.
- 3.2 Full planning permission was granted on 24 January 2018 for the erection of a new industrial warehouse (use classes B1, B2 and B8) together with associated service yard and car parking. (Application Ref: P/12/2017), providing 2,892sq.m of warehouse floorspace and 508 sq.m of office floorspace. The approved building measures approx. 78m in length by 39m in width, with a height of 18.5m to the eaves. It is this building that this application seeks to extend.
- 3.3 All pre commencement conditions attached to the above permission have been discharged, and building works are currently well advanced on the site.

4. THE PROPOSED DEVELOPMENT

- 4.1 This application seeks full planning permission for an extension to the approved industrial warehouse building. The extension would be of the same design, use of materials and depth as the approved building and would extend north beyond the approved gable by approx. 22.8m. The height of the extension to the ridge (21.1m) and eaves (18.5m) would match those of the approved building.
- 4.2 The materials of external construction for the proposed extension would match those approved building, and be finished in Albatross Grey coloured steel cladding to the lower banding, with Merlin Grey steel cladding to the upper banding. The roof will be finished with Goosewing Grey steel cladding.
- 4.3 No windows are proposed for the extension, however there are three rooflights proposed to both the front and rear roof pitches. One personnel door is proposed to the front elevation and one to the rear.
- 4.4 A total of 34 car parking spaces are to be provided as part of the approved building, which includes 2 accessible spaces.
- 4.5 The proposed extension, given its limited size, is not considered to give rise to substantial additional vehicular movements, but will result in a less cramped and more efficient operation for the use.
- 4.6 There will be 8 No. secure cycle parking spaces to be provided as part of the approved building, which will also be sufficient to cater for this proposed extension.
- 4.7 The planning application is supported by the following documentation:
- Completed Planning Application Forms and Certificates;
 - Planning Application Fee £4,560;
 - Supporting Planning Statement – 3523-CAU-XX-XX-RP-T-0300.A0-C1 (this document);
 - Ecological Assessment – 7128.003;
 - Application drawings:
 - Site Location Plan - 17049-C4C-BB-ZZ-DR-A-(00)101;
 - Existing Site Plan - 17049-C4C-BB-ZZ-DR-A-(00)100;
 - Proposed Site Plan - 17049-C4C-BB-ZZ-DR-A-(00)150 P01;
 - Existing Ground Floor Plan - 17049-C4C-B1-00-DR-A-(20)100;
 - Proposed Ground Floor Plan - 17049-C4C-B2-00-DR-A-(20)150;
 - Existing Elevations - 17049-C4C-B1-ZZ-DR-A-(20)200;
 - Proposed Elevations - 17049-C4C-B2-ZZ-DR-A-(20) 250;
 - Drainage Layout Plan – CAU-XX-XX-DR-C-1600 P3.



Proposed Site Layout Plan



Proposed Layout Drawing

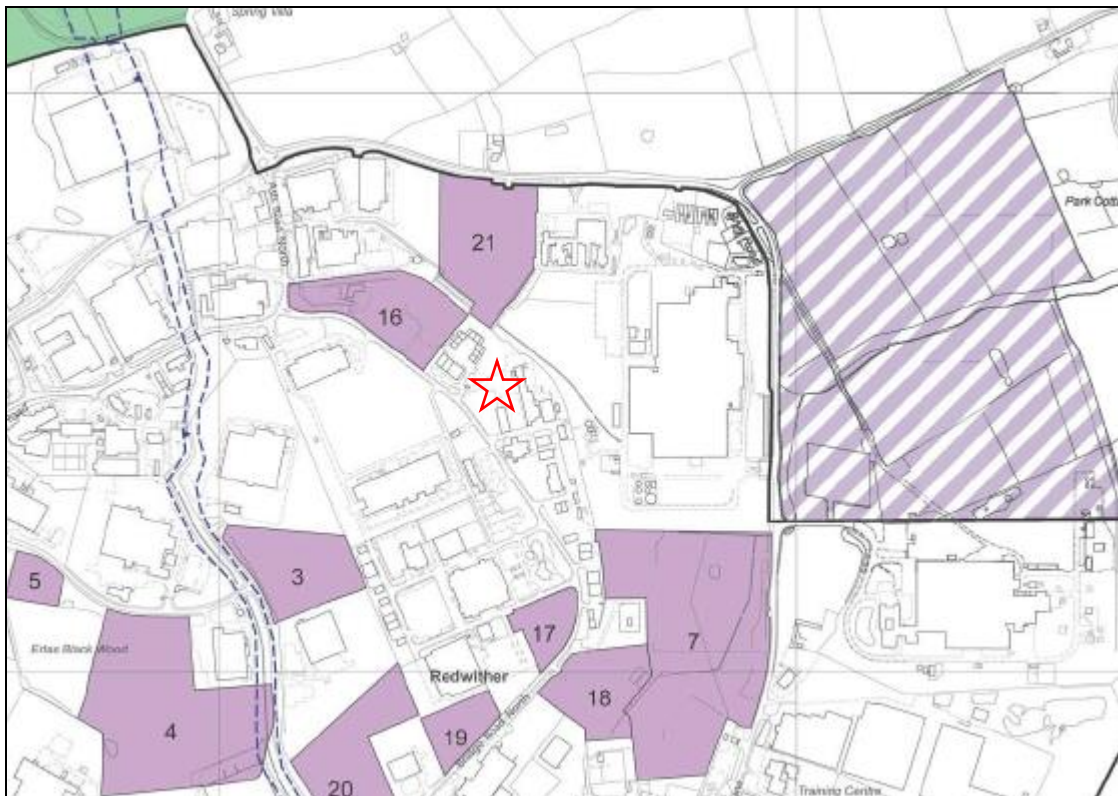


Proposed Elevations

5. THE DEVELOPMENT PLAN

- 5.1 The statutory Development Plan for the area within which the application site is located comprises the following:
- The Wrexham UDP, (adopted February 2005).
- 5.2 Wrexham County Borough Council is currently preparing the Local Development Plan 2 (2013 to 2028), which will replace the currently adopted Unitary Development Plan. The Wrexham Local Development Plan 1 (March 2012) was submitted to the Welsh Government and the Planning Inspectorate for Examination in September 2011, however due to fundamental concerns raised by the Planning Inspector during the examination hearings, the Plan was withdrawn. The revised LDP 2 is reasonably advanced, having been the subject of consultations, where it is hoped will be submitted to the National Assembly towards the end of this year, with a potential adoption date of spring 2019.
- 5.3 As part of the evidence base to the LDP process, Wrexham County Borough Council prepared a report, BP5, in relation to the expansion of the Wrexham Industrial Estate. This is as a direct result of proposed new allocations within Wrexham Town, which would provide a sustainable opportunity for people living and working at Wrexham Industrial Estate. BP5 states that the Wrexham Industrial Estate is recognised as a major national employment centre, being the second largest industrial estate in the UK. It found that much of the land available at Wrexham Industrial Estate was either undevelopable or was being held for the expansion of existing firms, or for alternative uses. The report considered that expansion to the north of the Wrexham Industrial Estate was the least harmful of the options available.
- 5.4 Therefore, whilst the Plan is not formally adopted, there is considerable support for additional industrial development on the site, as evidenced in the supporting text, and therefore, should be given appropriate weight in the determination process.
- 5.5 Strategic Policy PS1 of the UDP states that *“New development for housing, employment, and community services will be directed to within defined settlement limits/employment areas”*.
- 5.6 Strategic Policy PS3 of the UDP states that *“Development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land, wherever possible....”*.
- 5.7 Strategic Policy PS4 of the UDP states that *“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”*.

- 5.8 Policy GDP1 requires that all new development, inter alia, should ensure that built development is of a scale, design and layout, and 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; 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; 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, and secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.
- 5.9 Policy E4 of the UDP states that “Employment development on unallocated land within settlement limits will be permitted subject to Policy GDP1.
- 5.10 Policy T8 of the UDP 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.....”



Extract from Wrexham UDP – Wrexham Industrial Estate Inset.

	Settlement Limit / Ffin Anheddiad - PS1		Walking/Cycling Route / Llywybr Cerdied/Beicio - T10
	Employment / Gwaith - E1		Protection of Mineral Resources / Diogelu Adnoddau Mwynau - MN9
	Large Single User Employment Site / Safle Gwaith Unigol - E3		Minerals Buffer Zone / Cylchfeydd Rhagod Mwynau - MW11
	Pentre Maelor Business Use / Defnydd Busnes Pentre Maelor - E8		
	Green Barrier / Ffin Gwyrdd - EC1		
	Special Landscape Area / Ardal Tirlun Arbennig - EC5		
	Development and Flood Risk / Datblygiad a Perygl Llif - EC12		
	Pentre Maelor Buffer Zone / Parth Rhagod Pentre Maelor - EC17		

Wrexham UDP – Wrexham Industrial Estate Inset - Plan Notation

6. OTHER MATERIAL CONSIDERATIONS

NATIONAL PLANNING POLICY

- 6.1 Planning Policy Wales (Edition 9) November 2016 states at 7.6.1 that *“Local Planning Authorities should adopt a positive and constructive approach to applications for economic development”*.
- 6.2 PPW at 4.2.2 states that *“The planning system provides for a presumption in favour of sustainable development to ensure that social, economic and environmental issues are balanced and integrated, at the same time, by the decision taker when:*
- *Preparing a development plan (see Chapter 2) and;*
 - *In taking decisions on individual planning applications (see Chapter 3)”*.
- 6.3 Chapter 7 of PPW ‘Economic Development’ states that the Welsh Government defines economic development of land and buildings for activities that generate wealth, jobs and incomes. Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services.
- 6.4 At Paragraph 7.1.3, it states that *“The planning system should support economic and employment growth alongside social and environmental considerations within the context of sustainable development. To this end, the planning system, including planning policies, should aim to ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses”*. At Paragraph 7.1.4, it states that *“...local planning authorities should aim to steer economic development to the most appropriate locations, rather than prevent or discourage such development”*.

TECHNICAL ADVICE NOTES

- 6.5 TAN 3 – Simplified Planning Zones
- TAN 5 – Nature Conservation and Planning
- TAN 23 – Economic Development

SUPPLEMENTARY PLANNING GUIDANCE

6.6 Draft SPG Note 35: Great Crested Newt Mitigation Requirements – Johnstown Newt Site SAC and the Wider Countryside.

7 REVIEW OF THE PLANNING ISSUES

a) The Principle of Development on the Application Site

- 7.1 This application follows on from the recent approval for the “*erection of Industrial Warehouse (Use Class B1, B2 and B8) with associated service yard and car parking*”. Given that the site is located within the defined boundary of the Wrexham Industrial Estate, and that planning permission has recently been secured on the site, it is considered that the principle of this industrial warehouse development at the site has been established.
- 7.2 In terms of the surrounding uses, again the recent approval for the Clwydian Group building for Industrial purposes, together with other existing operations close by, confirm that the principle of storage and distribution use at the site is entirely appropriate.

b) Economic Development

- 7.3 Wrexham Industrial Estate is recognised as a major national employment centre, being the second largest industrial estate in the UK. The background work carried out for the replacement LDP found that that much of the land available at Wrexham Industrial Estate was either undevelopable or was being held for the expansion of existing firms, or for alternative uses.
- 7.4 In accordance with PPW, the planning system is supportive of economic and employment growth alongside social and environmental considerations within the context of sustainable development. The planning system should aim to ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses.
- 7.5 The proposed development of this extension to the approved warehouse is in accordance with local and national policy, as the site is within the defined boundary of the Wrexham Industrial Estate, and as referred to above, is one of the most appropriate locations for economic development proposals such as this.
- 7.6 The proposed extension is unlikely to result in increased staff numbers, but will serve to safeguard and protect existing employment and maintain current numbers of staff at the site.

c) Sustainability

- 7.7 The proposed development is located within an accessible urban location within Wrexham Industrial Estate. Abbey Road is situated within the north eastern quadrant of Wrexham Industrial Estate, which is approx. between 3 and 4km walking distance from the outskirts of Wrexham. The site is well served in relation to local bus services.
- 7.8 A bus stop is located within 100m of the site, on Abbey Road, linking to Wrexham town centre. As can be seen from the table below, bus accessibility to and from the site is

relatively good, with some 43 busses serving the stop each day (Mondays to Saturdays) between 06:05 hours and 22:10 hours. Services include the following:

NORTHBOUND	REDWITHER TOWER
Service Number	Destination
13B	Wrexham
41	Wrexham
41A	Wrexham
42	Wrexham
C56	Wrexham
Buses per hour (Peak)	4 (every 15 mins)
Buses per hour (interpeak)	2 (every 30 mins)

- 7.9 The site will be accessed from Abbey Road, via the recently approved and constructed Clwdian Group industrial standard site access, which has pedestrian access into the site. It is considered that the site is sustainably located and is therefore in accordance with GDP1 of the UDP and the general presumption in favour of sustainable development contained within PPW.
- 7.10 The proposed development will help to promote sustainability and reduce the need to travel, by safeguarding existing employment and promoting additional employment opportunities that are convenient for local communities and will not require residents to travel to the main centres for employment.
- 7.11 Employees working at the proposed warehouse extensions will be able to make use of covered cycle parking and shower and changing facilities which are presently available at the site.

d) Ecology

- 7.12 The application is supported by an Ecological Assessment, prepared by TEP, which has been carried out for the site. The assessment has been informed by a desk based ecological

assessment (which is included at Appendix A), including data compiled from previous reports prepared by Marches Ecology, and a Phase one habitat survey of the development site.

- 7.13 The assessment confirms that there are no internationally or nationally designated wildlife sites within the proposed development or within 2km of the site. The closest statutorily protected site is Midland Meres and Moses RAMSAR site, which lies approximately 4km to the northwest.
- 7.14 The site falls within the SSSI Impact Risk Zone for the River Dee SSSI and Dee Cliffs Farnham SSSI, but the proposed development does not meet any of the risk criteria identified for the IRZ and therefore consultation with Natural England is not required. There are no pathways by which the development site would result in adverse impacts, direct or indirect, upon the SSSI's.
- 7.15 Wrexham Industrial Estate Wildlife Site is located within 1km. The closest parcel is located approx. 400m south east of the site and includes a mosaic of scrub, grassland and tall herb. This site will not be directly impacted by the development. There are busy roads and industrial development separating the wildlife site from the development. Species using the wildlife site are unlikely to be present within habitats on site.
- 7.16 The assessment notes that there are no notable habitats recorded on site or adjacent to the site. Furthermore, no protected or invasive species were identified on site. As a consequence, there are no implications to the development with respect to protected or invasive plant species.

Badgers

- 7.17 An exclusion zone has been created surrounding the badger sett on site. The proposed extension area habitat does not offer suitable habitat for sett excavation or for badger foraging/commuting. The badger sett is also monitored by Marches Ecology.

Bats

- 7.18 Six bat-boxes have been erected in the mitigation area by Marches Ecology. Of these, three bat-boxes are located within the applicant's site. These are maintained and monitored annually.
- 7.19 The proposed extension area does not contain any habitat suitable for roosting bats. The trees to the north of the site could provide foraging and commuting routes for bats, however these trees do not form part of, nor will they be affected by the proposed extension works.

Birds

7.20 Five bird boxes have been erected in the mitigation area by Marches Ecology as mitigation for the current development at the site. Two of these are located within the applicant's site. These are also monitored and maintained annually.

7.21 Little ringed plover has been recorded previously within the site boundary, however given the disturbance caused by the current development, it is considered that this may discourage birds from using the site, and in any event, the proposed extension area does not provide optimal habitat. As a result, it is considered that there will not be any impact on little ringed plover.

Butterflies

7.22 The mitigation area has been plug planted with butterfly specific plant species by Marches Ecology. There are no more implications for development with regards to butterflies.

Great Crested Newts

7.23 The exclusion fence around the site, as part of the mitigation measures for the current development, will have prevented amphibians entering the site. Two hibernaculum have previously been created on site by Marches Ecology.

7.24 Due to the exclusion fence being maintained and translocation carried out by Marches Ecology, no GCN will be present within the extension site boundary. The report concludes that there are no implications to development of the extension area in regard to GCN.

Ecology Recommendations

7.25 The report recommends a number of mitigation measures be actioned at the site, which includes:

- Monitoring of bat-boxes annually until 2021;
- Any works to be undertaken in the bird nesting season will require a suitably qualified ecologist to carry out a nesting bird check, to ensure no active birds nests will be disturbed or destroyed;
- The butterfly management plan, created by Marches Ecology, will be supervised by TEP to ensure mitigation takes place. Butterfly population and distribution across the site will be monitored annually until 2021. Additional grassland wildflower mix specifically designed for butterfly species is recommended in order to ensure that the grizzled and dingy butterfly population remains and grows on the site.
- Monthly monitoring of the GCN exclusion fencing will continue until October 2018. In order to provide additional mitigation for the proposed extension exclusion zone within the northwest of the site, three swales are proposed for creation in the north and east of the

site, and close to the woodland. This will serve to encourage newts away from the hazardous road. Details of which are shown within Appendix B of the report. In addition, the proposals include:

- One additional hibernacula to be created on site, whilst the existing two will be opened up and properly managed; and
- Installation of bypass kerbs on entrance road and parking areas.

e) Landscape and Visual Impact

- 7.26 The proposed extension will be designed to match the approved development being carried out at the site, and will utilise the same materials of external construction.
- 7.27 Given that the site lies within the Redwither Industrial Complex, within the Wrexham Industrial Estate, the site is surrounded by a number of industrial uses. The proposed development will therefore have minimal impact upon the landscape and visual qualities of the area.

f) Traffic and Access

- 7.28 The existing approved warehouse occupies a floor area of 2,892sq.m. The current proposal seeks to increase this by 846sq.m, and therefore it is not anticipated that this minor increase in floorspace will give rise to any significant increase in traffic generation.
- 7.29 The proposals merely seek to ensure a more efficient operation at the site is enabled, together with ensuring existing employment is adequately safeguarded for the future. It is not envisaged that there will be increased levels of employment as a result of this proposed extension.
- 7.30 Consequently, in view of the very limited increase in the size of the proposed development, it is unlikely to result in harm to road safety or the operation of the surrounding highway network in the area.
- 7.31 As referred to above, the site is well served by public transport, with several bus stops being available within easy walking distance, thus reducing reliance on the private car.

g) Design

- 7.32 The proposed materials of external construction have been chosen to reflect a modern industrial unit, comprising of two horizontal bands of vertically composite profiled metal cladding panels. The lower banding would be constructed from Albatross Grey coloured cladding, whilst the upper banding would be in Merlin Grey coloured cladding. The roof would be clad in Goosewing Grey coloured cladding.

7.33 The design and appearance of the proposed extension would match that of the existing recently approved building, and use the same materials. The proposed development would be the same depth, height and would extend north beyond the approved gable by 22.8m. The height of the extension to the ridge (21.1m) and eaves (18.5m) would match those of the approved building.

7.34 There are no windows proposed for this extension, just three rooflights to each front and rear roof pitch.

h) Flood Risk and Drainage

7.35 The application site is located within Flood Zone A, as indicated on NRW's Development Advice Map, which is considered to be at little or no risk of fluvial or coastal/tidal flooding.

7.36 The application is supported by a Proposed Drainage Layout plan Ref: 3523-CAU-XX-XX-DR-C-1600 P2, which details the proposed surface water scheme for this extension.

7.37 The Phase 2 Extension Works involve the erection of an additional three bays to the Phase 1 unit, providing an additional roof area of 875m². The extended unit would be served by an additional apron/hardstanding area, formed by extending the existing vehicle hardstanding area. The additional area of vehicle hardstanding amounts to 380m².

7.38 The combined surface water flow from roof and hardstanding areas will need to be attenuated to a 1 in 100 year storm event that includes a 30% allowance for climate change. This measure is consistent with the drainage strategy adopted for the Phase 1 site. According to MicroDrainage calculations, the approximate surface water storage volume for Phase 2 is 43m³.

7.39 The additional hardstanding area is susceptible to contamination and therefore will be provided with a Class 1 full-retention oil separator installed prior to attenuation. A SPEL P015/CSC, or similar, can provide the required separation capability. The oil separator will be alarmed to indicate relative levels of contaminants. Roof water should not discharge through the separator.

7.40 The attenuation cells and oil separator will be located to the west of the Phase 2 extension and within the hardstanding area. The attenuation cells will have a controlled outlet of 5 litres per second, and discharge to the surface water pumping station provided as part of the Phase 1 works. This pumping station would continue to discharge at the existing surface water sewer at a flow rate of 8.7 litres per second.

7.41 The northern and western kerbs of the extended hardstanding area would help to direct exceedance flows to the proposed and existing hardstanding areas, preventing overland flow to third party land.

7.42 There is no foul water flow generated by the Phase 2 extension works.

8 CONCLUSIONS

- 8.1 Following the granting of planning permission for the erection of the Industrial Warehouse (Use Class B1, B2 and B8) together with associated service yard and car parking, it is clear to see that the principle of the proposed development has been established.
- 8.2 In terms of the surrounding uses, again the recent approval for the Clwydian Group building for Industrial purposes, together with other existing operations close by, confirm that the principle of storage and distribution use at the site is entirely appropriate.
- 8.3 The proposed development of this extension to the approved warehouse is in accordance with local and national policy, as the site is within the defined boundary of the Wrexham Industrial Estate, and as referred to above, is one of the most appropriate locations for economic development proposals such as this. The principle of providing additional floorspace is therefore supported.
- 8.4 The site is sustainably located, having good links to public transport. The proposals are therefore in accordance with the requirements of Policy GDP1 of the UDP and the general presumption in favour of sustainable development contained within Planning Policy Wales.
- 8.5 The Ecological Assessment confirms that there are no implications for the development with respect to protected or invasive plant species. The proposed extension area does not offer suitable habitat for sett excavation or for badger foraging/commuting, nor does it contain any habitat suitable for roosting bats. Although little ringed plover have previously been recorded within the site, it is considered that due to the development works currently taking place, this would discourage them and as a result there will be no impact.
- 8.6 There are no implications for the development with regards to butterflies, nor will there be in respect of Great Crested Newts, given that the exclusion fencing has been adequately maintained.
- 8.7 The proposed extension will be designed to match in design, colour form and texture, that of the approved development being carried out at the site. As a result, there are no implications with respect to landscape, design of visual appearance.
- 8.8 The proposals to extend the recently approved building will not result in increased staff numbers, but will allow a more efficient operation at the site, together with ensuring that existing employment is safeguarded for the future.
- 8.9 The application site is located within Flood Zone A, as indicated on NRW's Development Advice Map, which is considered to be at little or no risk of fluvial or coastal/tidal flooding. The application is supported by a Proposed Drainage Layout plan which details the proposed

surface water scheme for this extension, which will link to the existing. There is no foul water flow generated by the Phase 2 extension works.

- 8.10 The proposed development accords with the provisions of the Development Plan and PPW, and will not result in material harm to interests of acknowledged importance.
- 8.11 As evidenced above, there is considerable support for the proposed development, and as a result, it considered that with the imposition of suitable conditions, there are no overriding reasons why planning permission for this proposal should be withheld.

