

SUPPORTING PLANNING STATEMENT

PLOT 1A BRYN LANE, WREXHAM

AUGUST 2011

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APPENDICES

Appendix 1: Site Plan – Outline Proposal (Drawing Reference 500)

Appendix 2 : Indicative Landscaping Plan (Drawing Reference 901)

1. INTRODUCTION

- 1.1 This Supporting Planning Statement has been prepared by HOW Planning LLP in support of a outline planning application on behalf of Kingmoor Park. The application relates to land off Bryn Lane, Wrexham.
- 1.2 This planning application seeks permission to redevelop the site for a proposed B1/B2/B8 use development located on the site known within the application as 'Plot 1a'. The proposals are described in detail in section 3 of this statement and are fully illustrated on the submitted plans.
- 1.3 This statement is intended to set out the case for development and to address relevant planning policy considerations. It considers the proposed development in light of national and development plan policy guidance and assesses the compatibility of the development in planning policy terms.
- 1.4 This statement is divided into six sections (including this Introduction) as follows:
- **Site Location and Description** – A description of the site including location, characteristics, general surroundings and relevant planning history (**section 2**);
 - **The Proposed Development** – A description of the proposed development (**section 3**);
 - **Planning Policy Framework** – This section sets out the relevant planning policy (**section 4**);
 - **Conformity with Planning Policy** – Asses how the planning proposals conform with the relevant planning policy discussed in section 4 (**section 5**);
 - **Conclusions** – This section summarises the overall conclusions which support the case for the proposed development on this site (**section 6**).

- 1.5 The application is accompanied by a comprehensive suite of supporting documents and a number of plans. The scope and extent of supporting information has been prior agreed with Wrexham County Borough Council (WCBC) and has been subject to pre-application consultation with the Council.
- 1.6 It should be noted that in some instances, the suite of submission documents are re-submissions of previous reports prepared in connection with this site. However and as agreed with WCBC, the ecological report has been updated to reflect current site conditions.
- 1.7 These are set out in the table below:

DOCUMENT	AUTHOR	DATE
Supporting Planning Statement	HOW Planning LLP	August 2011
Ecology Assessment	TEP	August 2011
Transport Statement	HOW Planning LLP (Appendices by Crowd Dynamics)	August 2011
Drainage Statement	HOW Planning LLP (Appendices by Shepherd Gilmour)	August 2011
Ground Conditions Desk Study	HOW Planning LLP (Appendices by Shepherd Gilmour)	August 2011
Landscape and Ecological Framework	HOW Planning LLP	August 2011
Design and Access Statement	HOW Planning LLP	August 2011

2. SITE LOCATION AND DESCRIPTION

- 2.1 This section describes the application site, its surroundings, characteristics and local setting along with relevant planning history.

The Site

- 2.2 The site's location and edge red boundary are shown in Appendix 1 of this document. It is located off Bryn Lane and is located directly to the west of TDG's existing operations and to the east of Wrexham County Borough Council's Recycling Centre. There is a small building to the immediate south of the site that was once occupied by the Wrexham Model Car Club. To the north and north east is an area of open land currently used for cattle grazing. The site is not specifically allocated in the Wrexham Unitary Development Plan (UDP) however it is located within the boundary of Wrexham Industrial Estate as defined on the proposals map. The application site extends approximately 1.28 hectares (3.16 acres).
- 2.3 The site itself currently comprises a grassed plateau that sits approximately 2.5 - 3m higher than Bryn Lane. Small clusters of trees have been planted along the fringes of the site along the sloped embankments rising to the even plateau.
- 2.4 A planning application has been submitted which adjoins the site to the south. This application sits on the site known as Plot 1b and consists of a Biomass Plant. The application has been made by Green Plan Energy (application reference P/2010/0642). Due consideration has been given to proposed development within this application.
- 2.5 This is demonstrated on the proposed Indicative Landscaping Plan (Drawing Reference 901) as included in Appendix 2, which demonstrates that consideration has been given to the siting of the proposals in relation to this adjacent development. By doing so has ensured that appropriate 'wildlife corridors' are maintained through the site at the benefit of local ecology.

Surrounding Land Uses

- 2.6 The site is located within the boundary of the Wrexham Industrial Estate which holds a variety of large buildings with a mixture of operating uses, such as large distribution depots. The majority of these complexes located within the Industrial Estate are concentrated to the south of the site, further along Bryn Lane. Moving further north from the site boundary along Bryn Lane and out of the settlement limits of the Industrial Estate, the area is characterised by a mosaic of agricultural land use fields and boarder treatments such as hedgerows, with a numbers of isolated farmsteads in the locality. At this point, Bryn Lane connects to Hugmore Lane just north of the site. This route provides a strategic connection to the main A534 Wrexham Road.
- 2.7 As stated above, the uses that immediately surround the site include the TDG warehousing complex to the east and the Wrexham County Borough Recycling centre to the west. The Kellogg's plant is located adjacent to the recycling centre, north-west of the site boundary.

Planning History

- 2.8 An application was submitted to Wrexham County Borough Council on the 10th September 2008 (application P/2008/0992). The outline application was for B1/B2/B8 development including access. The Council resolved to grant the application subject to a Section 106 Agreement.
- 2.9 In addition, to the immediate south of the site a change of use application was submitted to Wrexham County Borough Council on the 4th August 2009 (application P/2009/0653). The application was for the change of use of the existing social club to business premises consisting of offices, a workshop and for storage and distribution. The application was approved on the 24th September 2009.

3. DESCRIPTION OF THE PROPOSED DEVELOPMENT

- 3.1 This section of the statement outlines the key elements of the development proposals as shown on the proposed site plan contained in Appendix 1.

Description of Development

- 3.2 The description of development for which planning permission is sought comprises:

“Outline application for B1/B2/B8 development including means of access and layout”.

- 3.3 The detailed description of development is outlined below.

Use and Amount

- 3.4 The application is submitted in outline including means of access and layout and seeks planning permission for a B1/B2/B8 land use as a potential occupier is currently unknown. Associated car parking and landscaping also form part of the outline proposals although it is noted that landscaping is subject to further discussion with WCBC and therefore is a reserved matter.

- 3.5 The proposals consist of a ‘starter unit’ of 5,590sqm. The unit consists of open warehouse/light industrial floorspace and associated office space.

Layout and Scale

- 3.6 The proposed layout shows a total of 42 parking spaces of which 4 will be disabled and a starter unit of 5,590sqm.
- 3.7 The proposed site plan (Drawing Reference 500) illustrates the proposed layout and also provides an indication of the scale of the proposals.

Access

- 3.8 The development will utilise the existing main access with Bryn Lane with a new access being constructed into the site along its northern boundary.
- 3.9 Further details regarding the proposals can be found in the accompanying Design and Access Statement and submission plans.

4 PLANNING POLICY FRAMEWORK

- 4.1 This section provides a summary of planning policy at all levels which is of relevance to the Council's consideration of the application.

National Planning Policy Context and Guidance

- 4.2 At the national level, current planning policy guidance on sustainable development and renewable energy development is set out in The Wales Spatial Plan, Planning Policy Wales (PPW) and a series of supporting Technical Advice Notes (TANs). A summary is provided below.

The Wales Spatial Plan – People, Places, Futures (2008 update)

- 4.3 The Wales Spatial Plan was originally adopted by the National Assembly for Wales in November 2004 however this has been superseded by the 2008 update. The Spatial Plan seeks to ensure that new development is sustainable and sets out a shared vision for Wales. The Spatial plan identifies 6 sub-regions within Wales and sets out the key spatial objectives and development targets for each of these areas. The vision and key objectives are seen as important considerations in a regional context and should inform local development plans. The key elements for realising this vision for North East Wales (within which Wrexham lies) include strengthening key hubs as a focus for investment in a sustainable future.
- 4.4 Central to the entire vision is the promotion of sustainable development, which is at the heart of the strategy, especially regarding the need to address and respond to climate change.

Planning Policy Wales (Edition 2, June 2010)

- 4.5 Planning Policy Wales (PPW) sets out the Welsh Assembly Government's sustainable land use policy. This provides the context within which Unitary Development Plans are prepared and development control decisions on individual planning applications and appeals are taken. PPW is supplemented by a series of

Technical Advice Notes (TANS); together with Welsh Office Circulars this comprises the range of national planning policy.

4.6 PPW is underpinned by the principles of sustainable development. This means that sustainability is placed at the heart of the decision making process. This is reflected in the pursuit of five key objectives:

- *Living within environmental limits:* by setting out a pathway to using only our fair share of the Earth's resources and becoming a One Planet nation within the lifetime of a generation;
- *Ensuring a strong, healthy and just society:* their focus on how a sustainable approach will improve the quality of life and well-being of the people of Wales and especially those in their less well-off communities;
- *Achieve a sustainable economy:* by setting out how to transform the economy to one that is low carbon, low waster;
- *Promoting good governance:* through confirming sustainable development as the central organising principle of the Welsh Assembly Government and through encouraging and enabling other to embrace sustainable development as their central organising principle; and
- *Using sound science responsibly:* through the use of sustainable development principles as part of their evidence-based approach to policy making.

4.7 The Assembly Government's Environmental Strategy and Action Plan sets out the long term strategy for the Welsh environment. It contains details of specific additional actions which should be taken in order to plan for climate change. The five main themes of the Strategy are as follows:

- Addressing climate change;
- Sustainable resource use;
- Distinctive biodiversity, landscapes and seascapes;
- The local environment; and
- Environmental hazards.

- 4.8 As such, PPW provides the strategic policy framework to promote a sustainable future for Wales with renewable energy seen as key in ensuring this future is realised.

Ministerial Interim Planning Policy Statement 01/2008 (Planning for Good Design)

- 4.9 The statement provides guidance on Design and Access Statements and advocates an integrated and inclusive approach to sustainable design, proportionate to the scale and type of development proposed. A Design and Access Statement accompanies this application.

Ministerial Interim Planning Policy Statement 01/2009 (Planning for Sustainable Buildings)

- 4.10 This statement provides guidance on how the Assembly Government is to move towards more sustainable and zero carbon buildings. Of relevance it states that for applications for non residential development which will either have a *'floorspace of 1,000 sqm or more, or will be carried out on a site having an area of one hectare or more to meet the Building Research Establishment Environmental Assessment Method (BREEAM) 'Very Good' standard and achieve the mandatory credits for 'Excellent' under issue Ene1 – Reduction of CO₂ Emissions'*. The accompanying Design and Access Statement outlines the commitment to meeting these standards.

Technical Advice Notes (TANs)

- 4.11 There are a number of Technical Advice Notes which should be read in conjunction with Planning Policy for Wales, together with the published Ministerial Statements they make up national planning policy. Those which are relevant are discussed below.

TAN 22 – Planning for Sustainable Buildings (2010)

- 4.12 This TAN gives technical guidance on delivering sustainable buildings through the planning system stating that it is the aspiration of the Assembly Government that all new buildings should achieve aim to achieve a zero carbon standard. It states that in line with PPW, a minimum sustainable building standard will be expected to be achieved for most new planning applications for residential and non residential development. In achieving such standards, the TAN provides an introduction into the definition of sustainable buildings and the standards of assessment, the design solutions which may be employed in meeting these standards, and further design guidance on delivering low carbon buildings.
- 4.13 For non residential developments, the TAN provides an outline of the BREEAM (Building Research Establishment Environmental Assessment Method) standards. It notes that the standards established under the BREEAM scheme for non-residential development form a useful framework for energy efficiency consideration. The Design and Access Statement submitted in conjunction with this application contains further details on proposed energy reduction techniques and sustainability techniques to achieve a BREEAM rating of 'Very Good'.

TAN 5 – Nature Conservation and Planning (2005)

- 4.14 TAN 5 sets out further guidance in relation to nature conservation and planning, including the protection and enhancement of biodiversity and geological conservation. It summarises the position as set out in Planning Policy for Wales in relation to the conservation of internationally and nationally designated sites and habitats and also covers local sites. In particular, it deals with the conservation of protected and priority species. Reference is also made to their habitat requirements and the implications of such for new development. Full account has been given to the site's biodiversity as outlined in the accompanying Landscape and Ecological Framework.

TAN 18 – Transport (2007)

- 4.15 This TAN gives technical guidance on the provision of transport infrastructure and services, which improve accessibility, build a stronger economy, improve road safety and foster more sustainable communities. This includes the integration of transport with land use planning, the integration between different types of transport, and integration of transport with the environment, education, social justice, health, economic development and wealth creation; all of which should be taken into consideration regarding development proposals.

Local Planning Policy ContextWrexham Unitary Development Plan (UDP) (February 2005)

- 4.16 The Wrexham UDP covers the administrative area of Wrexham County Borough Council. It supersedes previous adopted development plans, namely the Wrexham Maelor Plan, the Glyndwr Local Plan and the Clwyd Structure Plan. The following is a summary of policies contained within the adopted UDP which are considered to be relevant to the evaluation of the planning application.
- 4.17 Policy PS1 – is one of several Part One strategic policies. This policy states that new development for housing, employment and community services will be directed to within settlement limits/employment areas. The site is located within the settlement limits of the Wrexham Industrial Estate on unallocated land.
- 4.18 Policy PS2 – States that development must not materially detrimentally effect countryside, landscape/townscape character, open space, or the quality of the natural environment.
- 4.19 Policy PS3 – States that development should use previously developed brownfield land in preference to the use of greenfield land particularly where greenfield land is of ecological, landscape or amenity value or comprises agricultural land of grades 1, 2 or 3A.

- 4.20 Policy PS4 – 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.
- 4.21 Policy PS12 – Proposals for the generation of energy from renewable sources will be supported provided that the wider environmental benefits are not outweighed by any detrimental impacts of the proposed development on the landscape, public safety, and the local environment. As discussed in detail below, it is considered that there will be no detrimental impact in this regard.
- 4.22 The UDP sets out a number of Development Objectives, as outlined in policy GDP1 which states that all new development should:
- 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 locality;
 - Take account of personal and community safety and security in the design and layout of development and public/private spaces;
 - Make the best use of design techniques, siting and orientation in order to conserve energy and water resources;
 - Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality;
 - Ensure that built development is located where it has convenient access to public transport facilities, and is well related to the pedestrian and cycle routes wherever possible;
 - Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industrial and quarrying, and associated noise, odour or vibration arising from development;
 - Secure public services (e.g. gas, water, electricity) to development at the minimum costs;
 - Safeguard sites and areas of nature conservation and wildlife interest, and provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest;

- Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site;
- Secure the development of sustainable communities, through the promotion of the economic, social and environmental wellbeing of the area.

4.23 Policy EC4 states that development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape. As outlined in the accompanying Landscape and Ecological Framework new planting is proposed as part of the proposed development.

4.24 Policy EC6 'Biodiversity Conservation' states that 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. Furthermore, it states that where such development is permitted, losses should be kept to a minimum, and compensatory measures should be provided. The accompanying Landscape and Ecological Framework outline proposals for habitat creation and enhancement on the site to ensure a net gain of biodiversity at the site.

4.25 Policy EC13 – This policy states that development which would result in unacceptable adverse impact on the water environment due to additional surface run-off will not be permitted. The accompanying Drainage Statement demonstrates that greenfield runoff rates can be accommodated on the site and so there will be no adverse impact on the water environment due to additional surface water runoff.

4.26 Policy E4 states that employment development on unannotated land within settlement limits will be permitted subject to Policy GDP1. The supporting text of the policy goes on to state that such developments should contribute to the economic use of land, avoids pressure on the countryside, and serves to remove the detrimental effect of blight within settlements. It is considered that the proposed development does contribute to the economic but also sustainable use of the land. The site is also located within an area of existing industrial

development and therefore avoids pressure on the countryside whilst ensuring the sustainable use of previously developed land.

Supplementary Planning Guidance

- 4.27 There are a number of local planning guidance notes which have been taken into account in the development of the application proposals. These comprise:

LPG Note 6 – Access to and the use of buildings (September 2004);

LPG Note 7 – Landscape and development (November 2003);

LPG Note 17 – Trees and Development (April 2006);

LPG Note 22 – Sustainable Building (July 2004);

LPG Note 26 – Landscape and Industrial Development (November 2003);

LPG Note 29 – Employment Development and Nature Conservation (August 2009)

Emerging Policy: Wrexham Local Development Plan

Deposit Wrexham Local Development Plan (Consultation – June 2010)

- 4.28 This document is currently under-going consultation and brings together the outcome of the 'Issues and Options' and the 'Preferred Strategy' documents, previously published by Wrexham Council. In essence, it sets out a vision and objectives for the development of the County Borough, along with a range of policies which will be used to determine planning applications up to 2021. It also includes proposals maps which set out where new development such as housing, employment and retail will be acceptable and also areas that are protected from development.
- 4.29 The vision and strategy focuses on the following:
- Maximising the use of previously development, under-used or vacant land (brownfield land);
 - Confining development to existing settlement limits;
 - Focusing investment to Wrexham and the Wrexham Industrial Estate;
 - Directing some development to the Western Villages of Acrefair/Cefn Mawr, Broughton, Brymbo, Chirk, Coedpoeth, Gwersyllt, Llay, Penycae,

Rhos/Johnstown, Rhostyllen, Ruabon, Tanyfron and Southsea in order to encourage social, economic and environmental regeneration in these areas;

- Restricting large-scale new development in the more rural settlements without adequate community facilities, transport networks and infrastructure capacity;
- Promoting an integrated transport system, enhancing public transport, walking and cycling facilities and;
- Protecting areas of high quality landscape, nature conservation interest and the historic environment mainly located in the Rural Hinterland.

4.30 The proposals will assist in contributing toward the vision set out in the preferred strategy by maximising the use of previously developed land within the settlement limits of the Wrexham Industrial Estate, whilst enhancing and strengthening its employment role in the borough and sub region. In addition, the proposals constitute a highly sustainable development which will contribute to meeting the energy targets set out in national policy which also underpins the emerging Local Development Plan.

4.31 Although this document has not been adopted, and is only one document in a line of publications, it should be noted as a material consideration within this Supporting Planning Statement in relation to the development proposals put forward in this application.

5 ASSESSMENT OF THE PROPOSALS

- 5.1 The preceding chapters have described the site location, proposed development, and the relevant planning policy framework which should be considered in relation to the development proposals put forward by this application. This section considers the application proposals compliance with the local, regional and national policy described in the previous chapters.

Ecological Considerations

- 5.2 This application is supported by a detailed ecological assessment of the site including a Phase 1 Habitat Survey. Detailed ecological mitigation and landscape proposals are set out in the Ecological and Landscape Management Framework. These demonstrate that development can be achieved with only limited ecological impacts. Whilst the scrub land habitat on the site will be lost, no ponds or trees will be removed as part of the proposals. Existing ecological features on the site will be improved and enhanced whilst a suitable area of habitat mitigation to compensate for the loss of scrub land will be provided as part of the principal application. The ecological mitigation and landscape proposals have been agreed in principle with the Countryside Council for Wales and accord to planning policy, including LPG Note 29 – Employment Development and Nature Conservation (August 2009).

Highways Considerations

- 5.3 The Transport Statement submitted with this application has considered the impact of the proposals on the highway network by utilising existing data and previous reports prepared in connection with the proposal site.

Drainage

- 5.4 The site has been identified as being within 'Zone A', which is the lowest flood risk category. A Drainage Statement forms part of this application and utilising existing data and previous reports prepared in connection with the proposal site. It sets out an outline scheme of surface water drainage and attenuation which will

ensure that proposed surface water run off rates match the existing scenario. An outline foul drainage scheme has also been produced.

Assessment of Proposals

- 5.5 This application seeks outline approval for B1/B2/B8 'Starter Units' including means of access and layout. The site is well located and provides a good level of accessibility whilst the proposals will fit in well with the surrounding context. The site is therefore demonstrably a suitable site for the proposed development.
- 5.6 As set out previously, the proposals are technically acceptable. The scheme has been developed in a comprehensive manner including the consideration of the proposed Plot 1b site to the immediate south of the proposals. It is supported by a detailed set of technical reports and surveys which have been prepared over subsequent years in connection with this site.
- 5.7 Ecological and landscape matters have been covered extensively, with significant local improvements proposed. The design of the proposals have been informed by the local context, including ecological and access considerations.
- 5.8 The proposed development will be a sustainable one. It will provide jobs for local people and contribute towards a sustainable economy and sustainable communities. In particular, opportunities will be provided for small to medium enterprises (SMEs). The building itself has been conceived with the requirement to achieve the BREEAM rating of 'very good'. A number of techniques are set out in the Design & Access Statement which will help to achieve this.
- 5.9 Whilst this application does not seek approval for materials or elevational design, the guidance contained within national policy (including the requirement for sustainable development), Planning Policy Wales and the Wrexham UDP has been taken into account. Of particular relevance are the Local Planning Guidance Notes as referred to in the Design and Access Statement, and which have guided evolution of the proposals.

- 5.10 It is considered that the proposals will bring about significant economic benefits for the local economy. The GVA employment sites study carried out for the Council has identified an oversupply of poor quality, constrained employment sites. The proposals provide the opportunity to contribute to the employment land offer with a suitable 'product' in an attractive location and help to redress the identified imbalance in the employment land offer.
- 5.11 In addition, these proposals will add to the 'catalyst effect' and the injection of confidence for Wrexham Industrial Estate. New investment in the estate will improve the image of the area as an employment location and help to consolidate Wrexham's role as the economic driver in North East Wales.
- 5.12 It is considered that the proposals are in line with planning policy and have been demonstrated to be technically acceptable. We invite the Council to approve this proposal and thereby permit this site to make a full contribution to the continuing economic renaissance of Wrexham.

6 CONCLUSION

- 6.1 This Planning Statement has been prepared by HOW Planning LLP in support of a full application on behalf of Kingmoor Park. It relates to land off Bryn Lane, Wrexham.
- 6.2 The Statement considers the development in light of national, regional and local planning policy, demonstrating compliance with all tiers of policy. As such it is considered that the proposed development can provide a positive contribution to the Wrexham Industrial Estate.
- 6.3 The proposals are fully in accordance with the relevant policies of Wrexham's UDP in that they seek to develop previously developed land at an appropriate location and due to the proposed sensitive scale, layout and design.
- 6.4 As no policy allocations are outlined in the UDP's proposals map, an assessment has been undertaken based on the criteria outlined in the policies of the UDP. The assessment has demonstrated compliance, and as a result, we request that the application be approved accordingly.

HOW Planning LLP

August 2011

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APPENDIX 1

APPENDIX 2