

# 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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## 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

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| <b>Approved</b> | Howard Jones | <b>Date</b> | 5 August 2019 |

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## 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 completed warehouse building. This follows a previous refusal dated 22 October 2018 (Application Ref: P/2018/0728).
- 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 a resubmission application for full planning permission to provide a three bay extension to the north west of the recently completed warehouse building.
- 1.4 The existing 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 provide additional warehousing and storage space, which will ensure that the business is safeguarded, and existing jobs are protected over the longer term, whilst bringing valuable new business and employment to the area.
- 1.6 The proposed extension will enable McCarthy Distribution Ltd to expand within Wrexham, and on the one site, which will improve the sustainability of the business by creating better economies of scale, rather than having to look at alternative sites.
- 1.7 The full postal 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.

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## 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 completed warehouse development 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.
- 2.4 The application site presently comprises a cleared site, following the demolition of previous smaller buildings, which lies directly adjacent to the completed warehouse development.
- 2.5 The adjacent 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 several industrial uses.



Google Extract – Application site shown red.

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### 3 RECENT PLANNING HISTORY OF THE SITE

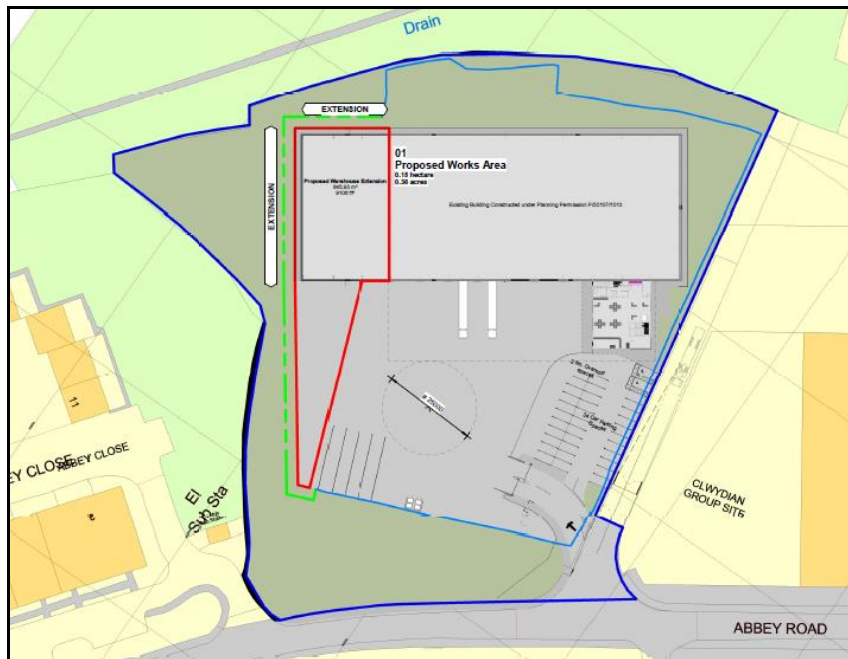
- 3.1 Planning permission for the erection of a single storey unit to provide 5,348 sq.m of Industrial Floorspace (B2 and B8) with 1,299 sq.m ancillary office space (B1) for Clwydian Group was approved 11 January 2016 (Application Ref P/2015/0886). The application included the creation of one new access 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 for McCarthy Distribution Ltd (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 construction of this building is now complete and is fully operational, and it is this building that this application seeks to extend.
- 3.3 Planning permission for a three-bay extension to the then partly completed industrial warehouse building was refused on 22 October 2018 under planning ref P/2018/0728. The application was refused for the following two reasons:
1. *“The proposal results in an unacceptable loss of habitat for Welsh Priority Species (grizzled skipper) and fails to effectively mitigate its loss. The proposals will detrimentally effect the population of grizzled skipper that this site is able to support.....”*
  2. *“No supporting information has been submitted to demonstrate that the original drainage system has sufficient capacity to accept additional flows without detriment to the original design standard. In addition, no supporting calculations have been submitted to justify the sizing of the proposed extension surface water management system. There is no right of connection to the private pipe for the discharge of surface water, and no real prospect that permission would be given should a request be made.....”*

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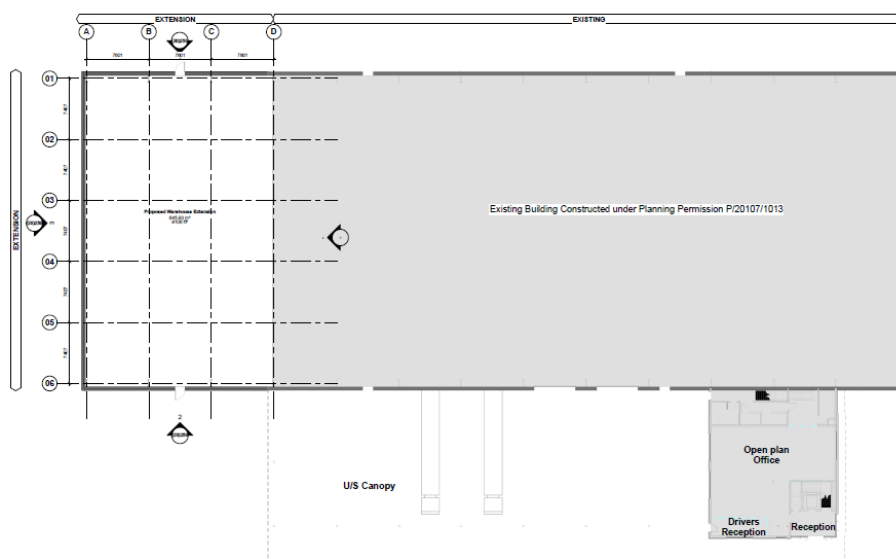
## 4. THE PROPOSED DEVELOPMENT

- 4.1 This application follows on from the previous refusal of planning permission and once again seeks permission for a three-bay extension to the completed industrial warehouse building. The extension would comprise 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 used in the completed building, which include 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 24 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.
- 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;
  - Supporting Planning Statement – 3523-CAU-XX-XX-RP-T-0302.A0-C1 (this document);
  - Ecological Assessment – 7128.003 Version 7.0;
  - Grizzled Skipper Mitigation Proposals – 49.18 Version III;
  - 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;
    - Landscaping Plan – MH19/01 02;

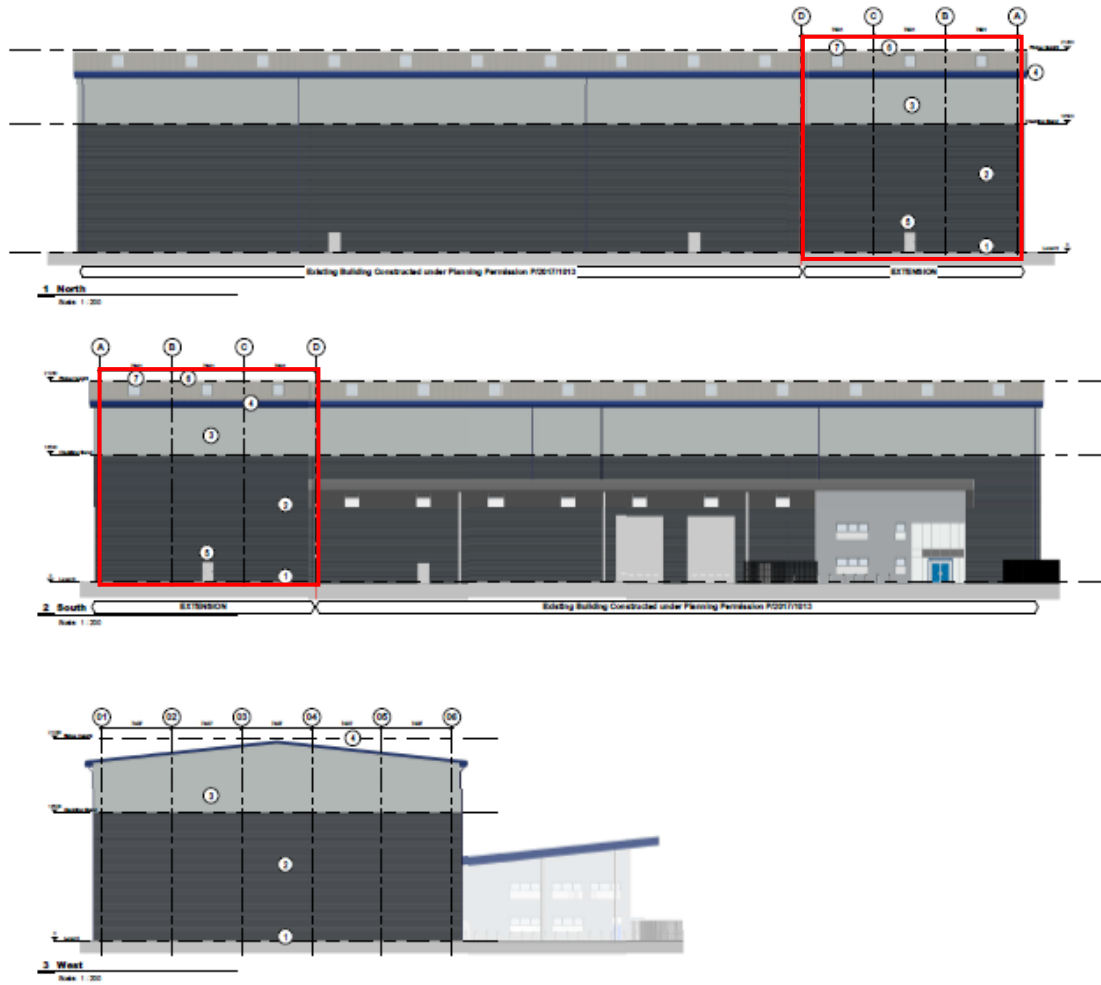
- SAB Application Drainage Plan (Phase 1) –3631- CAU-XX-XX-C-1601 P02;
- SAB Application Drainage Plan (Phase 2) -3631-CAU-XX-XX-DR-C-1602 P02;
- SAB Application Drainage Plan – 3631-CAU-XX-XX-DR-C-5100 P02 (Details);
- SAB Application Plan – 3631-CAU-XX-XX-DR-C-5400 P01;
- Proposed Drainage Strategy GA – DMS620-200-P4;



Proposed Site Layout Plan



Proposed Layout Drawing



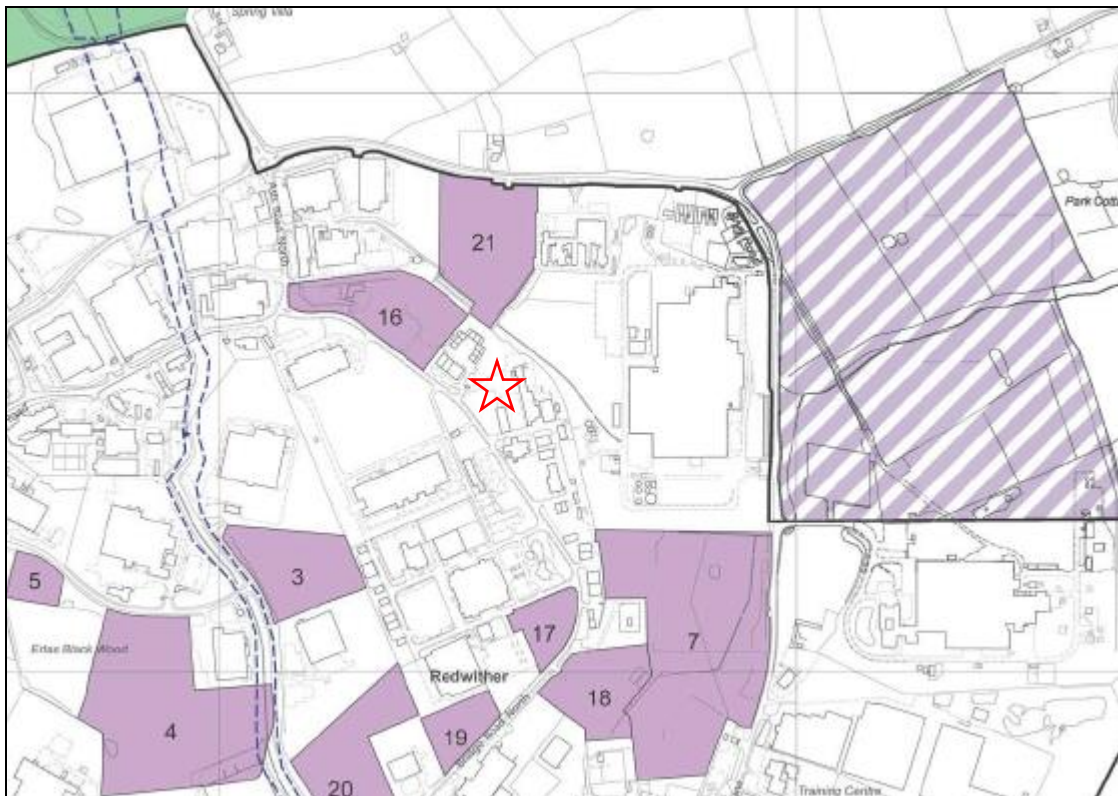
Proposed Elevations

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## 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, and was submitted to the Welsh Government and PINS on 30 November 2018. Additional details were requested and received in April 2019. The hearing sessions are expected to commence on 3 September 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, this 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 10) December 2018 sets out the land use policies of the Welsh Government.
- 6.2 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic and environmental well-being of Wales, in accordance with the requirements of, inter alia, the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015.
- 6.3 PPW confirms that a plan-led approach is the most effective way to secure sustainable development through the planning system and that it is essential that plans are adopted and kept under review. This is reflected in legislation which secures a presumption in favour of sustainable development in accordance with the development plan, unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.
- 6.4 PPW introduces the concept of placemaking, which is intended to ensure that planning decisions consider all aspects of well-being and deliver new development which is sustainable and provides for the needs of all people. Four key interlinked themes are identified (Strategic and Spatial Choices; Active and Social Places; Productive and Enterprising Places; and Distinctive and Natural Places) and together these are intended to promote placemaking with a view to achieving sustainable places.
- 6.5 “Strategic and Spatial Choices” is concerned with the siting of new development, with the priority being on the use of previously developed land, safeguarding the best and most versatile agricultural land with designations such as Green Belt and Green Wedge to be deployed to guide spatial choices.
- 6.6 “Active and Social Places” is concerned with ensuring the provision of housing, retailing, employment and community and leisure development in locations which minimise the need to travel and where a choice of modes of transport is available.
- 6.7 “Productive and Enterprising Places” theme of planning policy topics covers economic development, physical infrastructure, energy and the efficient use of resources. It emphasises the need to plan for appropriate infrastructure in order to support economic development and tourism, together with decentralised, low carbon energy production and increased recycling in the interests of sustainable development.

- 6.8 In considering strategic and spatial choices, PPW acknowledges that good design is fundamental to creating sustainable places where people want to live work and socialise.
- 6.9 When identifying sites in their development plans planning authorities are advised to consider previously developed land and/or underutilised sites located within existing settlements in the first instance, with sites on the edge of settlements considered at the next stage.

#### **TECHNICAL ADVICE NOTES**

- 6.10 TAN 3 – Simplified Planning Zones (1996)
- TAN 5 – Nature Conservation and Planning (2009)
- TAN 23 – Economic Development (2014)

#### **SUPPLEMENTARY PLANNING GUIDANCE**

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

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## 7 REVIEW OF THE PLANNING ISSUES

### a) The Principle of Development on the Application Site

- 7.1 This application follows on from the 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 and constructed on the site, it is considered that the principle of this proposed extension to the existing industrial warehouse is appropriate and should be supported.
- 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. For planning purposes, the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. The planning system should 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 PPW states that it is important that planning authorities are aware not only of the economic needs of their own areas but also those of the surrounding region. It further states that strategic employment sites should be identified at the regional scale.
- 7.6 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.
- 7.7 The proposed extension will provide additional warehousing and storage space, which will ensure that the business is safeguarded, and existing jobs are protected over the longer term. It will result in the creation of up to 20 new jobs, including apprentices, which will bring valuable new business to the Wrexham area.

### 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 existing 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 previous application ref P/2018/0728 was refused for two reasons, one of which related specifically to the unacceptable loss of habitat for Welsh Priority Species (grizzled skipper) and that it failed to effectively mitigate its loss. Following this refusal, my client's specialist ecology advisors have been in discussions with officers at Wrexham Council to look at ways to provide additional areas for protected priority species. A revised ecological assessment was forwarded to officers, prior to arranging a meeting on the site (11 January 2019). Following the meeting, the ecological assessment was amended to take account of those further comments and now includes amended mitigation proposals.
- 7.13 This application is supported by a revised Ecological Assessment, prepared by TEP, together with a report on Grizzled Skipper mitigation proposals prepared by specialist invertebrate ecologist, Conops Entomology Ltd.
- 7.14 The ecology assessment was carried out initially using a desk-based assessment (which is included at Appendix B of the report), including data compiled from previous reports prepared by Marches Ecology, and a Phase one habitat survey of the development site. A site walkover was carried out and is referred to in the report.
- 7.15 The assessment confirms that there are no internationally or nationally designated sites for conservation within 1km of the development boundary. The closest statutorily protected site is Midland Meres and Moses RAMSAR site, which lies approximately 4km to the northwest.
- 7.16 The site falls within the SSSI Impact Risk Zone for the River Dee SSSI and Dee Cliffs Farnham SSSI, which are located approximately 3.3km to the east and 3.8km north east of the site boundary respectively. The proposed development is not listed as a likely risk for the designated sites associated with the IRZ's.
- 7.17 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.
- 7.18 The mitigation area that surrounds the site containing the proposed extension is subject to a great crested newt mitigation licence (Ref 76782:OTH:EPS:2017). The primary focus of the mitigation area is to deliver terrestrial refuge and foraging habitat for great crested newts. Secondary objectives relate to dingy skipper and grizzled skipper, species rich grassland and historically locally scarce flora including hoary ragwort, sticky groundsel, bristly ox-tongue and hairy St John's-wort.

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**Great Crested Newts**

- 7.19 The report states that over 50 records of great-crested newts were identified by Cofnod, primarily located to the north, south and east side of the site. The closest record was approximately 0.3km from the site boundary.
- 7.20 Previous mitigation work to address ecological impacts of the demolition and remediation of the former Elm Point site, implemented by WCBC, included the exclusion, capture and translocation of great crested newts from within the remediation area to the mitigation area. A total of eight great crested newts and 127 other amphibians were released into the mitigation area. A great crested newt exclusion fence has been installed that excludes the recently completed site, which remains in good condition.
- 7.21 The report states that the footprint of the proposed extension lies almost entirely outside the current GCN excluded development area for the recently completed unit.
- 7.22 The recommendations contained in the report in relation to GCN state that the existing amphibian exclusion fencing will need to be moved out and that the new exclusion area would need to be cleared of any amphibians that may be present. The proposed amphibian fencing plan is shown on drawing ref G7128.006.
- 7.23. To compensate for this loss of great crested newt foraging habitat, the land currently excluded from the mitigation area (east and southeast of Unit 1 ) will be enhanced and then incorporated into the mitigation area. The area measures 0.1ha and will therefore deliver at least 'like for like' compensation to ensure there is no net loss within the existing approved mitigation area.
- 7.24 The new compensation area to the south and east of the existing unit offer the opportunity to deliver net gain and increase in habitat diversity within the mitigation area through the creation of at least one new hibernacula and new aquatic habitat. New aquatic habitat associated with the corridor function of the mitigation site would serve to improve functionality in respect of foraging opportunities and, subject to design, breeding opportunities. The new aquatic feature would be located to the north as shown on TEP drawing G7128.003F.

**Badgers**

- 7.17 Two badger sett records and one live sighting of badger were identified by Cofnod within the 1km search area between 2007 and 2018. These records are located approximately 0.9km from the site. An exclusion zone has been created surrounding the badger sett on site. A badger licence is currently in place which permitted the construction of the new unit, which retains the sett but requires disturbing activities within close proximity. 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.

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- 7.18 The sett is accessed by badgers along the eastern edge of the site, and while the proposed extension is located a greater distance from the sett than the new unit, the proposed extension will result in a slight elongation of the corridor through which badgers would need to access within the site.
- 7.19 The report states that taking into account existing habitats off site to the north and east, this extended footprint is unlikely to significantly impact upon the ability of badgers to access the sett. The distance of these proposed works from the sett are not likely to pose a substantial threat to the integrity of the sett although there may be indirect disturbance from construction activities.

#### **Bats**

- 7.20 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.
- 7.21 The proposed extension area has negligible opportunities for bats, there are no potential roosting habitats present and the footprint is small. The proposed development will not result in the loss of roosting habitats nor the loss or physical fragmentation of nearby foraging or commuting impacts.

#### **Birds**

- 7.22 Five bird boxes have been erected in the mitigation area by Marches Ecology as mitigation for the development at the site. Two of these are located within the applicant's site. These are also monitored and maintained annually.
- 7.23 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.
- 7.24 The footprint of the proposed extension is small and narrow and comprises a generally sparse newly established grassland sward. There is a lack of structure that would offer nesting potential for passerine species.
- 7.25 The report confirms that the proposed extension is not likely to result in any loss of bird nesting habitat nor any significant losses of valued foraging habitat for bird species likely to be utilizing the adjacent or nearby habitats.

#### **Butterflies**

- 
- 7.26 The desktop search carried out by TEP identified records of 9 dingy skipper and 11 grizzled skipper both on site and within 1km. Monitoring by Marches Ecology of the mitigation site and the completed development site in 2016 and 2017 confirmed the presence of both species, although neither were present within any of the habitat creation areas (butterfly banks). The report confirms that in May 2018 Marches Ecology recorded four grizzled skipper within the mitigation area, two within the retained grassland and 2 within the created habitat area.
- 7.27 The proposed extension will result in the loss of approximately 0.1ha of grassland created and managed under the EMP which contains locally abundant important food plants for dingy and grizzled skippers which use the area. In addition, a further 5m wide temporary construction working area will also be required. Without mitigation the loss of this habitat would be detrimental to the long-term preservation and expansion of these butterfly species and is therefore contrary to National and Local Policy and the objectives of the EMP currently being implemented for the site.
- 7.28 The specialist report prepared by Conops Ecology has reviewed the above and developed further a scheme to improve the mitigation offered. It proposes to utilize the existing mitigation area and by manipulating and/or repurposing for grizzled skippers, improve the mitigation offered.
- 7.29 The report states that the two existing butterfly bunds are likely to be left redundant and therefore to mitigate for the loss of these and to increase the extent of this, it is proposed that the boundary bund on the western side of the site is repurposed as a butterfly bund. As it is almost 73m in length, this could represent a significant source for the butterflies.
- 7.30 The report states that two further bunds will be created, one along the north-west edge of the mitigation area, with the second forming part of the southeastern corner mitigation area.
- 7.31 In addition, the unimproved natural grassland to the west of the site does not appear to be of high value and the report suggests that ruderal plants are dominating the swards. This should be repurposed for grizzled skippers by partially scarifying the area to expose the underlying substrate.
- 7.32 Following the meeting on site with the Council's ecologist, the proposed mitigation has been further strengthened, and now incorporates the following (as shown on the accompanying habitat enhancement plans):
- The current proposed butterfly bank running parallel to the southern edge of the maintenance strip will be extended eastwards as far as possible and curved southeastwards to increase the length of the feature.
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- The butterfly bank running parallel to the northern boundary will join the western boundary bund to form a single continuous butterfly bank.
- The perimeter bund will now join the aforementioned northern boundary butterfly bank to extend this optimal resource for grizzled skippers. This feature will be further diversified to include an undulating edge that increases its footprint and also increases the southerly aspect faces that are preferred by the butterfly.
- To increase the unimproved neutral grassland mitigation area, it is proposed that this is repurposed as grizzled skipper habitat.
- The west facing car park slope adjacent to the grassland is proposed to be sown with a suitable wildflower mix to provide valuable nectar resource for the butterfly, whilst contributing to the wider pollinator foraging resources.
- On-going management and monitoring of the butterfly bank will take place to ensure there is always sections of the bund that are favourable for grizzled skipper.

### **Ecology Recommendations**

7.33 The report prepared by TEP recommends a number of mitigation measures to be provided across the site governing invasive species, GCN, Badgers, Birds, Bats and Butterflies. In relation to butterflies, these include:

- The provision of additional mitigation area in the east and south to create a wider corridor of open habitats that can be managed for butterflies.
- At least one additional butterfly bank will be created in the new compensation area to the south, either through utilising and enhancing existing site topography or by creating a brand new feature.
- Vegetation and substrates from the extension footprint will be translocated into new habitats.
- Previously translocated areas of creeping cinquefoil will be moved from the construction area of the extension and into new habitats to the south.
- Plug planting of larval food plants will be incorporated into the mitigation area along the east of the site to provide replacement foraging adjacent to areas currently used by butterflies and to encourage butterflies to colonise habitats in the south.

### **Ecology Summary**

7.34 The report prepared by TEP, at Section 6, includes a summary of the biodiversity losses that will arise from the proposed extension and the gains that will be delivered through recommended mitigation and compensation measures. (See Table 2 Extract below):

*Table 2: Biodiversity Losses and Gains*

| Mitigation Area Impacts                                                                                                      | Mitigation Area Gains                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>Loss of approximately 0.1ha of mitigation land from the north of the site.</li> </ul> | <ul style="list-style-type: none"> <li>Provision of approximately 0.1ha of land in the east and southeast of the site for inclusion in the mitigation area. Located to strengthen the mitigation corridor along the east of the site and substantially improved .</li> <li>Extension of the scope of the EMP to include the new habitats and continuation of management and monitoring.</li> <li>Additional funding to cover increased scope of EMP.</li> </ul> |

| Mitigation Area Impacts                                                                                                                                                                                         | Mitigation Area Gains                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>Loss of approximately 0.1ha terrestrial habitat currently used by GCN.</li> </ul>                                                                                        | <ul style="list-style-type: none"> <li>Fencing, translocation and other measures to avoid killing and injury of GCN.</li> <li>Provision of 0.1ha of habitat currently excluded from the mitigation area. Enhancement of habitat for GCN through creation of further hibernacula and a permanent water body.</li> <li>Amphibian friendly drainage measures.</li> </ul> |
| <ul style="list-style-type: none"> <li>Loss of up to 0.1ha habitat for grizzled and dingy skipper.</li> </ul>                                                                                                   | <ul style="list-style-type: none"> <li>Timely translocation of important butterfly habitat.</li> <li>Plug planting and seeding of butterfly food plants.</li> <li>Implementation of invasive species control measures.</li> <li>Continuation of management actions to ensure habitats remain suitable.</li> </ul>                                                     |
| Loss of butterfly mounds <ul style="list-style-type: none"> <li>Two in the North East corner (although not physically removed)</li> <li>One 5m length</li> <li>One 8m length</li> <li>Total loss 13m</li> </ul> | Butterfly habitat gains (butterfly banks ) <ul style="list-style-type: none"> <li>Western bank 73m in length</li> <li>Links to the bank at the Northwest corner (converted to a butterfly bund ) 67 m making the Western and Northwest banks 727sqm</li> <li>Butterfly bank in South East 55m 133sqm</li> <li>Total gain 195m</li> </ul> Net gain 182m                |

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- 7.35 The report confirms that offsite links to the northwest are currently limited by Abbey Road and the adjacent large area of amenity grassland, therefore potentially greater strategic benefits can be achieved by concentrating site mitigation efforts in the north, east and south of the site. Terrestrial habitats for GCN are already good both within the mitigation area and the adjacent green habitats; however the provision of new breeding habitat within the south provides the opportunity for expansion of breeding populations from the wider area, notably Bryn Lane to the south.
- 7.36 The existing mitigation area is already being managed for butterflies but adjacent offsite habitats are wooded and restrict opportunities for colony expansion. By widening the butterfly habitats along the eastern boundary, this will increase the value of the corridor for butterflies and encourages colonization of new areas.
- 7.37 The table demonstrates that there will be no net loss of biodiversity, no long term impact to protected butterflies or habitats and the favourable conservation status of GCN will be achieved.

**e) Landscape and Visual Impact**

- 7.38 The proposed extension will be designed to match the completed development and will utilise the same materials of external construction.
- 7.39 Given that the site lies within the Redwither Industrial Complex, within the Wrexham Industrial Estate, the site is surrounded by several industrial uses. The proposed development will therefore have minimal impact upon the landscape and visual qualities of the area.

**f) Traffic and Access**

- 7.40 The completed 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.
- 7.41 The proposals merely seek to ensure a more efficient operation at the site is enabled, together with ensuring that the existing business is safeguarded and existing jobs are protected over the longer term. The proposals will allow for the possible increase of up to 20 additional members of staff, with some of those being apprentices.
- 7.42 The application site is provided with good links to the highway network, and in view of the limited increase in the size of the proposed extension, it is unlikely to result in material harm to road safety or the operation of the surrounding highway network in the area.
- 7.43 As referred to above, the site is sustainable and is well served by public transport, with several bus stops being available within easy walking distance, thus reducing reliance on the

private car. Indeed, the proposed extension will enable McCarthy Distribution Ltd to expand on the one site, which will improve sustainability.

**g) Design**

- 7.44 The proposed materials of external construction have been chosen to match the completed 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.
- 7.45 The design and appearance of the proposed extension would match that of the completed 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.
- 7.46 There are no windows proposed for this extension, just three rooflights to each front and rear roof pitch.

**h) Flood Risk and Drainage**

- 7.47 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.
- 7.48 The previous application ref P/2018/0728 was refused for two reasons, one of which related specifically to drainage and that no supporting information had been submitted to demonstrate that the original drainage system had sufficient capacity to accept additional flows without detriment to the original design standard. Furthermore, no calculations were submitted to justify the sizing of the proposed extension surface water management system. The reason also included reference to not having a right of connection to the private sewer for the discharge of surface water.
- 7.48 The application is supported by a Proposed Outline Drainage Layout, that has been approved as part of the SAB pre application process. The accompanying drawings have been submitted as part of the formal SAB application process and are included with this application for assistance. They are:

DMS620-200 P4 – Proposed Drainage Strategy GA;

3631-CAU-XX-XX--C-1601 P02 – Phase I Warehouse;

3631-CAU-XX-XX-DR-C-1602 P02 – Phase II Warehouse Extension;

3631-CAU-XX-XX-DR-C-5100 P02 – SAB Application (Details);

## 3631-CAU-XX-XX-DR-C-5400 P012 – SAB Application.

- 7.49 The Phase 2 Extension Works involve the erection of an additional three bays to the Phase 1 unit, providing an additional roof area of 875m<sup>2</sup>. 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 380m<sup>2</sup>.
- 7.50 The proposals have considered the requirements for surface water discharge hierarchy and confirm that surface water discharge will be to a surface water sewer.
- 7.51 There is no foul water flow generated by the Phase 2 extension works.
- 7.52 With reference to the proposed connection to the existing private surface water sewer, an application was made to Wrexham CBC to discharge surface water from the site to an existing private surface water sewer. Details of predicted flow volumes and rates from the site were considered by WCBC, and their consent to connect was received on 16th July 2019.

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## 8 CONCLUSIONS

- 8.1 Following the granting of planning permission for the completed 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 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 completed 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 application is supported by an Ecological Assessment and supporting Grizzled Skipper mitigation proposals. The report prepared by TEP, at Section 6, includes a summary of the biodiversity losses that will arise from the proposed extension and the gains that will be delivered through recommended mitigation and compensation measures.
- 8.6 The report confirms that offsite links to the northwest are currently limited by Abbey Road and the adjacent large area of amenity grassland, therefore potentially greater strategic benefits can be achieved by concentrating site mitigation efforts in the north, east and south of the site. Terrestrial habitats for GCN are already good both within the mitigation area and the adjacent green habitats; however, the provision of new breeding habitat within the south provides the opportunity for expansion of breeding populations from the wider area, notably Bryn Lane to the south.
- 8.7 The existing mitigation area is already being managed for butterflies, but adjacent offsite habitats are wooded and restrict opportunities for colony expansion. By widening the butterfly habitats along the eastern boundary, this increase the value of the corridor for butterflies and encourages colonization of new areas.
- 8.8 The table within the report demonstrates that there will be no net loss of biodiversity, no long-term impact to protected butterflies or habitats and that the favourable conservation status of GCN will be achieved.

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- 8.9 The proposed extension will be designed to match in design, colour form and texture, that of the completed development. As a result, there are no implications with respect to landscape, design of visual appearance.
- 8.10 The application is supported by a Proposed Outline Drainage Layout, that has been approved as part of the SAB pre application process. The proposals have considered the requirements for surface water discharge hierarchy and confirm that surface water discharge will be to a surface water sewer. There is no foul water flow generated by the Phase 2 extension works.
- 8.11 An application was made to Wrexham CBC to discharge surface water from the site to an existing private surface water sewer. Details of predicted flow volumes and rates from the site were considered by WCBC, and their consent to connect was received on 16th July 2019.
- 8.12 The proposals to extend the completed building will create up to 20 new jobs, including apprentices and will allow a more efficient operation at the site, whilst ensuring that the existing business is safeguarded, and existing jobs are protected over the longer term. McCarthy Distribution Ltd are a critical supply chain partner to many of the local Wrexham businesses, who need to be able to expand to support the growth of their own businesses, which in turn creates further investment and new jobs for the local area.
- 8.13 The proposed extension will enable McCarthy Distribution Ltd to expand within Wrexham, and on the one site, which will improve the sustainability of the business by creating better economies of scale, rather than having to look elsewhere for new sites.
- 8.14 This revised submission addresses the previous reasons for refusal in a positive manner, the development accords with the provisions of the Development Plan and PPW, and as demonstrated above, will not result in material harm to interests of acknowledged importance.
- 8.15 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 resubmission should be withheld.



