



HASTON REYNOLDS

CHARTERED SURVEYORS

P2019/0484

Planning Statement

Change of Use of part of former
Passenger Transport Depot to provide
additional HGV Parking associated with
Existing Storage and Distribution Use

Unit 10
Vauxhall Industrial Estate
Ruabon
LL14 6HA

Tomlinson's Dairies Limited

HRL Ref: H0070-25-PDAS
June 2019
V01 Final

CONTENTS

1.	INTRODUCTION	Page 1
2.	SITE DESCRIPTION	2
3.	PLANNING HISTORY	3
4.	PROPOSED DEVELOPMENT	4
5.	PLANNING POLICY CONTEXT	5
6.	ASSESSMENT	10
7.	CONCLUSIONS	18



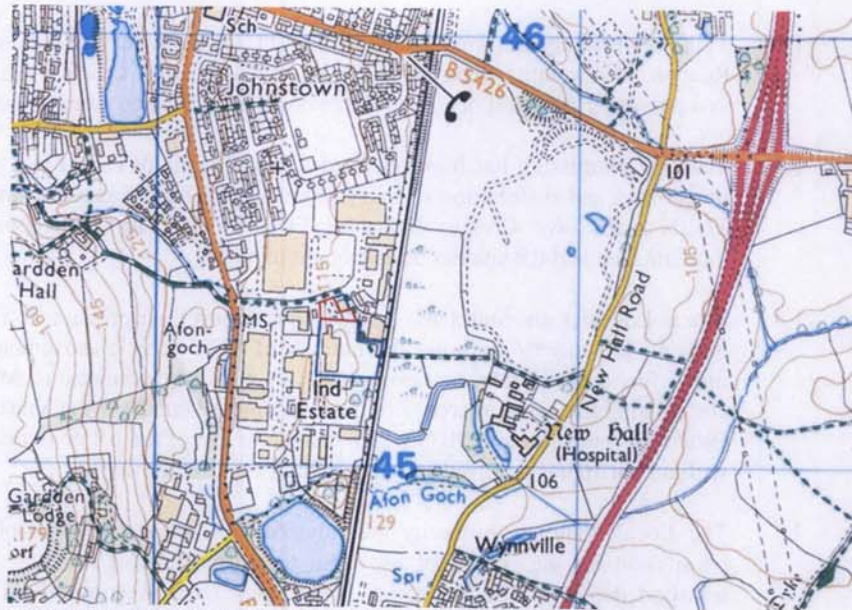
1. INTRODUCTION

- 1.1 Tomlinson's Dairies Limited (TDL) is currently the largest processor of liquid milk in Wales and principally operates from the Five Crosses Industrial Estate in Minera, Wrexham.
- 1.2 TDL has recently acquired Units 10 and 11 on the Vauxhall Industrial Estate in Ruabon. These units were previously occupied by GHA Coaches which used them as a passenger transport depot, until that company went into administration.
- 1.3 Planning permission has been obtained for the change of use of part of Unit 11 for the storage and distribution of dairy products that have processed and packaged at TDL's main Five Crosses Industrial Estate site. That development has been implemented and the site has been brought into use.
- 1.4 Moran Logistics are contracted by TDL to transport their products to its larger client outlets. In order to minimise the number of HGV vehicle movements, HGV road miles, fuel consumption, transportation costs and carbon emissions, Moran Logistics are utilising the external area within the adjoining Unit 10 at the Vauxhall Industrial Estate for the parking of HGVs. No change of use of the office /workshop building within Unit 10 has occurred and the building is currently vacant.
- 1.5 The Local Planning Authority has advised TDL of the need to obtain planning permission for the change of use from the former use of the site as a passenger transport depot to a B8 Storage or Distribution Use. Accordingly, TDL is making this planning application in order to regularise the change of use that has occurred.
- 1.6 Whilst there is no longer any statutory requirement for the submission of a Design & Access Statement, this Statement has been prepared by Haston Reynolds Ltd (HRL) in order to assist the Local Planning Authority with the determination of the planning application
- 1.7 Drawings submitted with the planning application include:

H0070-25-A3-PL-01 Location Plan
H0070-25-A3-PL-02 Site Plan

2. SITE DESCRIPTION

- 2.1 Unit 10 is located on the eastern side of the Vauxhall Industrial Estate, Ruabon at approximate Ordnance Survey grid reference 33040 34535.



Ordnance Survey© Crown Copyright. All rights reserved. Licence Number 100022432

- 2.2 Unit 10 is bordered to the south by Unit 11, which is in the same ownership, and to the north, west and east by other industrial developments.
- 2.3 The boundaries to Unit 10, including the common boundary with Unit 11, are defined by galvanised palisade fencing.
- 2.4 The access into Unit 10 has a tarmacadam surface, whilst the remaining external yard areas have a concrete surface.
- 2.5 The north eastern portion of Unit 10 is occupied by a vacant two storey office / workshop building.
- 2.6 Vehicular access into Unit 10 is gained from the B5605 Ruabon Road via the Industrial Estate access road which leads into the entrance on the northern boundary of the premises.
- 2.7 A public footpath runs between Unit 10 and the adjacent industrial unit (former Logs R Us) to the east before crossing over the railway line. The footpath is separated from Unit 10 by palisade fencing.

3. PLANNING HISTORY

- 3.1 There are only limited records available for the planning history of Unit 10.
- 3.2 However from the information that is available, it is evident that prior to 2012, Unit 10 was used for the operation of a plant hire business.
- 3.3 On 4 April 2012, planning permission was granted for a change of use of Unit 10 from a plant hire business to a 'bus depot'. The application documents indicate that 30 full time staff were employed from Unit 10 and that the site accommodated parking for 23 or 24 cars (the details on the application form and the site plan differ) and parking for 20 buses.
- 3.4 Unit 10 continued to operate as a passenger transport depot / bus depot until GHA Coaches was placed into administration in July 2016. Aside from a number of broken-down buses left on the site, the Unit remained vacant until its acquisition from the administrators by TDL and its subsequent use by Moran Logistics.
- 3.5 Information provided by the former bus operator indicates that the combined use of Units 10 and 11 resulted in a daily cumulative total of up to 560 large vehicle movements, 200 car movements and 24 miscellaneous vehicle movements associated with deliveries, resulting in an overall total of up to 784 vehicle movements per day.

4. PROPOSED DEVELOPMENT

- 4.1 The development proposed by way of this application would involve a change of use of part of Unit 10 from a passenger transport depot to storage and distribution.
- 4.2 The proposed development would facilitate the storage and subsequent distribution of dairy products that have been processed and packaged at the Tomlinson's Dairies Five Crosses site.
- 4.3 The extent of the area covered by the application is detailed on drawings H0070-25-A3-PL-01 and 02 and extends to approximately 0.26 hectares.
- 4.4 The change of use proposed by way of this application would not involve the construction of any new buildings and the floor area of the existing buildings would remain unaltered.
- 4.5 The external yard areas Unit 10 have been occupied by Moran Logistics Limited since September 2018 and are used for the parking of HGVs including tractor units, trailers and rigid vehicles. All of the HGVs that currently park at Unit 10 are used for the haulage of products associated with TDL. The co-location of Moran Logistic's vehicles that are used to transport TDL products with the TDL storage and distribution facility at Unit 11, provides a wide range of logistical, economic, highway and environmental benefits.
- 4.6 Unit 10 typically accommodates around 15 tractor units / rigid HGVs and around 20 trailers. No cars are parked within Unit 10 as the staff utilise the existing staff parking areas within Unit 11.
- 4.7 No changes to the existing access are proposed.
- 4.8 No changes to the existing foul and surface water drainage are proposed.

5. PLANNING POLICY CONTEXT

5.1 Introduction

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals are to be determined in accordance with the development plan, unless material considerations indicate otherwise.

5.1.2 In this instance the development plan currently consists of the Wrexham Unitary Development Plan 1996 – 2011 (UDP). The weight attached to relevant policies needs to reflect the intention that the Plan would cover the period to 2011. Indeed, the Introduction to the UDP confirms:

'Only those developments which the Council realistically expects to be completed by 2011 are included in the Plan.'

5.1.3 What constitutes a material consideration is not defined in planning legislation however in the case of *Stringer v MHLG* 1971 it was held that *'In principle... any consideration which relates to the use and development of land is capable of being a planning consideration. Whether a particular consideration falling within that broad class is material in any given case will depend upon the circumstances'*.

5.1.4 Planning Policy Wales (PPW) confirms that material considerations could include current circumstances, policies in an emerging development plan, and planning policies of the Welsh Government and the UK Government. PPW goes on to advise that material considerations must also be fairly and reasonably related to the development concerned.

5.1.5 Accordingly, in addition to site specific circumstances, the guidance provided within Planning Policy Wales (Edition 10), relevant Technical Advice Notes, any relevant Ministerial Interim Planning Policy Statement and relevant Local Planning Guidance Notes may constitute material planning considerations as may emerging Local Development Plan policies.

5.2 Wrexham Unitary Development Plan 1996 – 2011

5.2.1 A review of the UDP Proposals Map and Inset Map indicates that the application site is located on the Vauxhall Industrial Estate and within the Johnstown/Rhosllannerchrugog Settlement Limit.

5.2.2 From the UDP Proposal and Inset Maps, it is evident that the application site does not lie within an area subject to Special Landscape Area, Biodiversity Conservation or Green Barrier designations.

5.2.3 Having regard to the nature and location of the proposed development, it is considered that the following UDP policies are of most relevance to the determination of the planning application:

- Policy PS1 (Broad Location of Development)
- Policy PS2 (Broad Location of Development)
- Policy PS3 (Broad Location of Development)
- Policy PS4 (Broad Location of Development)
- Policy GDP1 (Development Objectives)
- Policy E4 (Employment Development (of Unannotated Land) within Settlements)
- Policy T8 (Parking)

5.2.4 Section 7 of the UDP deals with employment and at paragraph 7.3 explains that the local economy faces a number of challenges:

- less mobile investment available, and greater competition from other parts of the United Kingdom and other countries;
- loss of all assisted area status;
- pockets of severe unemployment and deprivation, especially in the urban villages to the west of Wrexham;
- commuting to centres of employment outside the County Borough, leading to monetary leakage;
- low economic activity rates and increasingly dependent population; and
- over-reliance on manufacturing, leaving the economy increasingly vulnerable to external decision-making.

5.2.5 This strikes a chord with various aims set out within the Productive & Enterprising Places Chapter of PPW.

5.3 Planning Policy Wales

5.3.1 Planning Policy Wales (PPW) (Edition 10) sets out the land use planning policies of the Welsh Government and is supplemented by various Technical Advice Notes (TANs).

5.3.2 Within the Foreward to PPW, The Cabinet Secretary of Energy, Planning and Rural Affairs explains that:

"Productive and Enterprising places are those which promote our economic, social, environmental and cultural well-being by providing well-connected employment and economic development in pleasant surroundings. These places are designed and sited to promote healthy lifestyles and tackle climate change by making them easy to walk and cycle to and around, access by public transport, minimising the use of non-renewable resources and using renewable and low carbon energy sources."

5.3.3 In relation to managing new development, PPW explains that:

"Development management is the positive and proactive approach to shaping, considering, determining and delivering development proposals through the process of deciding planning applications. It is led by the planning authority, working collaboratively with those proposing developments and other stakeholders including the local community. It must be undertaken in the spirit of partnership and inclusiveness (using the five ways of working) and supports the delivery of key priorities and outcomes (contributing to improving the social, economic, environmental and cultural well-being)."

5.3.4 In order to grow the economy in a sustainable way, PPW explains that:

"The planning system should enable development which contributes to long term economic well-being, making the best use of existing infrastructure and planning for new supporting infrastructure and services. Communities, national and local government, businesses, and the third sector must work together to take a long term view, integrating and aligning priorities through greater collaboration to achieve sustainable economic benefits for all in line with the well-being goals."

5.3.5 Paragraph 3.51 addresses 'previously developed land' and explains that:

"...wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome. ..."

5.3.6 Paragraph 3.52 goes on to explain that:

"Planning authorities should work with landowners to ensure that suitably located previously developed sites are brought forward for development and to secure a coherent approach to their development. ..."

5.3.7 PPW advocates integrated land use and transport planning and explains paragraph 4.1.4 that:

"The planning system must ensure it enables integration:

- within and between different types of transport;*
- between transport measures and land use planning;*
- between transport measures and policies to protect and improve the environment;*
and
- between transport measures and policies for education, health, social inclusion and wealth creation."*

5.3.8 In relation to economic development, paragraph 5.4.1 of PPW confirms that:

"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."

5.3.9 PPW also advises that:

"Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration. Sites identified for employment use in a development plan should be protected from inappropriate development."

5.3.10 Finally, at paragraph 5.4.13, PPW confirms that, inter alia, planning authorities should aim to:

- co-ordinate development with all forms of infrastructure provision such as transport and utilities;*
- support national, regional, and local economic policies and strategies;*
- align jobs and services with housing and sustainable transport infrastructure, to reduce the need for travel, and dependency on travel by car;*

- *promote the re-use of previously developed, vacant and underused land;*
- *deliver physical regeneration and employment opportunities to disadvantaged communities; ...*

5.3.11 Technical Advice Notes of some relevance include:

- TAN12: Design
- TAN 18: Transport
- TAN 23: Economic Development.

5.3.12 The advice in TAN 18 is consistent with that in PPW and at paragraph 3.1 explains that:

“The land use planning system can impact on travel patterns, by guiding the location, scale, density and mix of new development and controlling changes of land use. In this way, transport and land use interact and can have an effect on the emission of greenhouse gases, the health of the local population, social inclusion and the costs of congestion. Changes in travel patterns brought about by land use change in the future are likely to be incremental, but over the medium to long term could significantly reduce the need to travel and ensure that effective use is made of public transport options, walking and cycling. Planning authorities should ensure that their development plan strategy is compatible with the aim of reducing the need to travel and provides greater choice of means of transport other than the private car.”

6. ASSESSMENT

6.1 Planning Status

- 6.1.1 Unit 10 is located within a Settlement Limit as identified within the adopted Unitary Development Plan. The site is also located on the Vauxhall Industrial Estate which is identified within the emerging development plan as a protected employment site under Policy EM1.
- 6.1.2 Unit 10 was formerly used for the operation of a tool hire business and more recently a bus transport depot in conjunction with the adjacent Unit 11.
- 6.1.3 Accordingly, Unit 10 constitutes previously developed land or brownfield site.
- 6.1.4 In July 2016, GHA Coaches was placed into administration and from that point on, Unit 10 became vacant save for a few broken-down buses which the former owner and administrator failed to remove.
- 6.1.5 Following its acquisition by TDL, the external areas of Unit 10 were brought back into use by Moran Logistics in September 2018 for the parking of HGV tractor units, trailers and rigid bodied HGVs being used to transport supplies and products for TDL.
- 6.1.6 The former use of Unit 10 as a bus transport depot was considered to be a sui generis use. Accordingly a planning permission is required for any other use of the site.
- 6.1.7 Aside from much fewer vehicle movements being generated by the distribution use, the characteristics of the former and current uses are very similar.
- 6.1.8 The use of Unit 10 for the parking of HGVs associated with the B8 use of Unit 11 is consequently appropriate in principle. The re-use of this otherwise vacant, previously developed land, on a protected employment site within a Settlement Limit is supported by the guidance within PPW. It also accords with UDP Policy PS1, Policy PS2, Policy PS3 and Policy PS4 and Policy E4 which confirms that employment development on unannotated land within settlement limits will be permitted subject to Policy GDP1.

6.2 Employment & Economy

- 6.2.1 Unit 10 on the Vauxhall Industrial Estate had been vacant since GHA Coaches went into administration in 2016 with the loss of a significant number of jobs within Wales and elsewhere.
- 6.2.2 In the subsequent period up to September 2018, the site remained vacant generating no income, employment or wealth for the local economy.
- 6.2.3 The acquisition of Unit 10 by TDL and the subsequent re-use of the external areas by Moran Logistics constitutes a beneficial use of an otherwise vacant site.
- 6.2.4 The re-use of the external areas of Unit 10 by Moran Logistics is helping to support the effective and more efficient operation of the TDL sites at the Five Crosses Industrial Estate and the adjacent Unit 11 at the Vauxhall Industrial Estate. In particular, the use of Unit 10 by Moran Logistics is helping to reduce operational costs for both firms due to co-location. If the vehicles could not be parked at Unit 10 on the Vauxhall Industrial Estate, then they would have to operate from another location that is more remote from the TDL sites, resulting in additional costs, operating times, vehicle movements and HGV miles.
- 6.2.5 The HGVs parked at Unit 10 are involved in the transportation of TDL supplies and products and are operated by between 20 and 25 full time employees of Moran Logistics.
- 6.2.6 The re-use of the site is consequently accords with UDP policies PS1, PS2, PS3, PS4 and E4.

6.3 Highways and Transport Sustainability

Existing Road Network

- 6.3.1 Unit 10 is accessed via the existing cul-de-sac serving the entire Vauxhall Industrial Estate which leads off Ruabon Road.
- 6.3.2 The vehicular access into Unit is located approximately 210 metres along the Industrial Estate road from the junction with Ruabon Road.
- 6.3.3 A further 50 metres along the Industrial Estate road, there is a minor road which heads south for approximately 70 metres and serves Unit 11 (owned and operated by TDL) and Unit 9 (formerly occupied by Logs R Us, but now vacant).

- 6.3.4 Visibility at the junction of the access to Unit 10 and the Industrial Estate road is good in both directions and exceeds the required 40 metres distance specified in Table B of Annex B of TAN 18: Transport, based upon the 30 mph speed limit.
- 6.3.5 The main Industrial Estate Road connects to the B5605 Ruabon Road at a priority T junction. The minor arm of the junction serving the Industrial Estate has been specifically designed to facilitate the turning movements of HGV traffic and incorporates lead-in / lead-out tapers on the bellmouth radii to accommodate the swept paths of articulated vehicles and also provides good visibility in both directions. A bus stop with a shelter is also provided on the southern taper of the junction.
- 6.3.6 A shared pedestrian footway/cycleway route continues to the north along the east side of the B5605 to/from Johnstown. The footway continues to the south via dropped kerbs with tactile paving at the crossing point near the junction. The pedestrian footways also continue into the Industrial Estate along both sides of the access road, which is subject to parking control in the form of double yellow lines, in order to provide unobstructed traffic movement to/from the development.
- 6.3.7 Whilst the access road and B5605 to the north are subject to a 30 mph speed limit, this increases to 40 mph beyond the southern taper on the B5605 as the route continues into Ruabon.
- 6.3.8 If turning left from the Industrial Estate, approximately 2.2 km to the south, the B5605 meets the A539 at a 4 arm at-grade roundabout, passing through Ruabon en-route. To the west, the A539 continues through and beyond Llangollen as a single carriageway. To the east, the A539 is a dual carriageway for approximately 450m until reaching its grade-separated intersection with the A483, which also becomes a dual carriageway to the north at this point. The route to the south continues as a single carriageway for 3.75 km before running along the A5 Chirk Bypass towards Oswestry.
- 6.3.9 Turning right from the Industrial Estate junction directs traffic north through Johnstown and onwards towards another grade-separated intersection with the A483 at Rhostyllen approximately 3km distant. Approximately 2.2 km to the north of this intersection along the A483, there is another grade-separated intersection between the A483 and A525.
- 6.3.10 Turning left onto the A525 directs traffic through Coedpoeth towards the Five Crosses Industrial Estate, Minera, approximately 4 km distant; within which the main Tomlinson's Dairies buildings are located.

Baseline Traffic Flows

- 6.3.11 The previous bus operator has provided information regarding the historic traffic movements to/from Units 10 and 11. It was confirmed that approximately 120 buses/coaches were operating from Units 10 and 11 at any one time. Of these, approximately 60 would make one outbound and one inbound trip per day (120 movements); approximately 30 would undertake 3 outbound and inbound trips per

day (180 movements); and approximately 30 would undertake 4 outbound and inbound trips per day (240 movements). There would also be up to around 100 cars per day associated with the bus depot use. Assuming these cars only made one return trip per day, this equates to 200 car movements on the local road network.

- 6.3.12 In addition, there were between 10 and 12 vehicles of varying types per day making deliveries of fuel, parts, consumables etc. (20 to 24 movements), plus approximately 10 MOTs on two days each week, resulting in 20 HGV/Bus movements to the VOSA testing station.
- 6.3.13 Based upon the foregoing, it is apparent that the historic use of Units 10 and 11 resulted in a cumulative total of up to 560 large vehicle movements (including the MOTs), 200 car movements plus 24 miscellaneous vehicle movements associated with deliveries per day, resulting in an overall total of up to 784 vehicle movements per day.

Proposed Development & Traffic

- 6.3.14 The proposed development seeks the change of use of the external areas of the former bus depot at Unit 10 to facilitate the parking of HGVs associated with the storage and distribution of operation at the adjacent Unit 11. The premises would continue to be served by the existing, established access and neighbouring road network, which also serves the wider Vauxhall Industrial Estate.
- 6.3.15 The premises would be used to park HGV tractor units, trailers and rigid HGVs. Typically up to around 15 tractor units / rigid HGVs and 20 trailers will be parked within Unit 10. The type and number of vehicles parked there will however vary according to the time of day and haulage contract requirements and accordingly, some flexibility in terms of parking arrangement needs to be maintained.
- 6.3.16 The vehicles parked within Unit 10 typically generate a total of 40 to 50 HGV movements on the public highway per day (i.e. 20 to 25 outbound and 20 to 25 inbound).
- 6.3.17 The co-location of TDL at Unit 11 and the vehicles parked at Unit 10 which are operated by Moran Logistics and which serve TDL, means that there would no overall net increase in HGV movements from Unit 10 and Unit 11 as these vehicles would otherwise have to travel to and from a remote location elsewhere to serve TDL at Unit 11.
- 6.3.18 Whilst the site is within convenient walking distance of the bus stops on the B5605 at the access to the Vauxhall Industrial Estate, where a cycle route is also available, assuming the worst case scenario whereby all members of staff travelled independently in a private car, the 20 to 25 staff would add 40 to 50 movements. These staff park their cars within the Unit 11 car park.

Development Traffic Impact

- 6.3.19 By comparing the historic and existing/proposed movements to/from Unit 10 and

11, it is apparent that in a worst case scenario the haulage use represents a total reduction of over 400 large vehicle movements (bus/HGV) and 90 light vehicle movements (cars/motorcycles/vans) and 502 total vehicle movements when compared with the previous passenger transport use. However, given that the HGVs parked at Unit 10 serve the storage and distribution use at Unit 11, the benefits of co-location will in fact serve further reduce the number of HGV movements on the public highway.

- 6.3.20 In order to review the historic safety performance of the existing access, the Crashmap website has been interrogated, which revealed that there have been no recorded injury accidents at the B5065 and internal estate junctions serving the premises for the most recent 5 year period available, and only a single injury accident in 2012 on the Industrial Estate access road, approximately 85m from the B5065.



- 6.3.21 In the event there is a particular feature of the local road network that compromises safety, it is normal to find a number of incidents at the particular location, which share similar characteristics in terms of the causation factors etc. In this case, there are no accident clusters, which suggests the existing access arrangement is satisfactory to serve the routine movements of cars and HGVs, which were seen to take place during a site visit when the road network was reviewed.
- 6.3.22 Given the local road network has historically safely accommodated significantly higher numbers of vehicle movements to/from the premises than would arise as a result of the proposed development, even when assessing the proposal under a worst case scenario, and when taking into account the proximity and accessibility of bus services and footways/cycleways providing connections to the neighbouring areas, it is concluded that the proposed development should not be refused on traffic/transport grounds.

Conclusion

- 6.3.23 In light of the above, it is considered that the proposed development would accord with UDP Policies PS4, GDP1 d) and e) and T8.

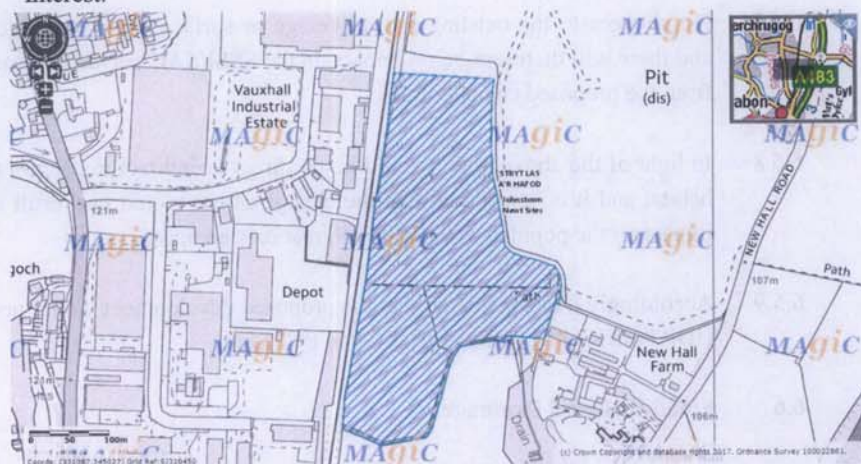
- 6.3.24 The proposed development would also accord with the guidance provided within Sections 4.7¹, 7.6² and 8³ of PPW.

6.4 Landscape and Visual Impact

- 6.4.1 The proposed development will involve the change of use of land from the parking of buses and coaches to the parking of HGVs associated with the storage and distribution use operating at the adjacent Unit 11. No new buildings are proposed and no changes to the existing building are proposed by way of this application.
- 6.4.2 The proposed change of use will not therefore have any adverse landscape or visual impact and will not therefore conflict with UDP Policy EC4.

6.5 Biodiversity

- 6.5.1 A review of the magic.gov.uk web site indicates that the site is not subject to any statutory wildlife designations.
- 6.5.2 There is however a large site to the east of the railway line which has been designated as a Special Area of Conservation and a Site of Special Scientific Interest.



Ordnance Survey© Crown Copyright. All rights reserved. Licence Number LIG0506

- 6.5.3 The Stryt Las A'r Hafod Site of Special Scientific Interest (SSSI) was designated as a SSSI in July 2001 whilst the Johnstown Newt Sites Special Area of Conservation (SAC) was designated in December 2004. The area, which was formerly a mineral

¹ Sustainable settlement strategy: locating new development

² Development control and the economy, including the benefits of co-location

³ Transport and in particular paragraph 8.1.4, section 8.2 and paragraph 8.7.1.

extraction and waste site, extends to 69.61 hectares and was designated principally due to the presence of a significant breeding population of over 300 adult great crested newts. Other amphibian species are also present including common frog, common toad, palmate newt and common newt.

- 6.5.4 Whilst Unit 10 is relatively close to the SSSI/SAC, there are no aquatic or terrestrial habitats within the application site that would be suitable for great crested newts or other amphibians. Furthermore, the SSSI/SAC is separated from Unit 10 by a railway line, another industrial unit and a tarmacadam access road. Accordingly, given that there are numerous ponds surrounded by optimal terrestrial habitat within the SSSI/SAC, it is extremely unlikely that any newts would travel into Unit 10 where there are no suitable habitats.
- 6.5.5 The development proposed by way of this application only involves a change of use of land and existing buildings and it does not involve the construction of any new buildings.
- 6.5.6 The HGV and other traffic generated by the proposed use would be significantly less than that generated by the former passenger transport depot use. Accordingly, in the unlikely event that a great crested newt did enter the site, the likelihood that it would be harmed would be less than under the existing permitted use.
- 6.5.7 No changes to the existing foul sewerage or surface water drainage are proposed and there will therefore be no impact on the SSSI/SAC's hydrology or water quality from the proposed change of use.
- 6.5.8 In light of the above, there would be no direct or indirect impact on the SSSI/SAC habitat and it is considered that the change of use would not result in any adverse impact on the population viability of great crested newts.
- 6.5.9 Accordingly it is considered that the proposed development would not conflict with UDP Policies PS11, GDP1 h), EC4 or EC6.

6.6 Flood Risk and Drainage

- 6.6.1 The proposed development is within Flood Zone 1 and accordingly is not at risk of flooding.
- 6.6.2 No increase in roof area or impermeable surfaced yard area is proposed and accordingly, there would be no increase in surface water generated within the site. The proposed change of use would consequently not increase the risk of flooding elsewhere.

- 6.6.3 No changes to the existing means of foul drainage or surface water drainage are proposed by way of this application.
- 6.6.4 Accordingly, it is considered that the proposed development would accord with UDP policies GDP1 f) & i) and EC13.

7. CONCLUSIONS

- 7.1 The development proposed by way of this application involves a change of use of part of Unit 10 on the Vauxhall Industrial Estate, Ruabon, from a passenger transport depot to the parking of HGVs associated with the storage and distribution use at the adjacent Unit 11.
- 7.2 Unit 10 has been vacant since the previous owner and occupier, GHA Coaches went into administration with the loss of a significant number of jobs.
- 7.3 The site constitutes previously developed land on an established industrial estate which is a proposed protected employment site within a settlement limit.
- 7.4 The re-use of this part of Unit 10 by Moran Logistics would help support up to 25 full time jobs and would provide a range of significant co-location benefits with the TDL operation at the adjoining Unit 11, including logistical, economic, highway and environmental benefits
- 7.5 No new buildings or additional floorspace would be created by way of this application.
- 7.6 When compared with the former passenger transport depot use of Units 10 and 11 combined, there would be a reduction of over 400 large vehicle movements (bus/HGV) and 90 light vehicle movements (cars/motorcycles/vans). However, given that the HGVs parked at Unit 10 serve the storage and distribution use at Unit 11, the benefits of co-location will in fact serve to further reduce the number of HGV movements on the public highway.
- 7.7 Whilst the application site is located across the Shrewsbury-Wrexham railway line from the Stryt Las A'r Hafod SSSI / Johnstown Newt Sites SAC, the proposed development would not have any direct or indirect adverse impact on the designated habitat, nor would it result in any adverse impact on the great crested newt population.
- 7.8 The application site is located within Flood Zone 1 and would not result in an increased risk in flooding elsewhere.
- 7.9 It is considered that the proposed change of use accords with the guidance set out in PPW and the relevant policies set out in the UDP.

David A Haston Dip Est Man MRICS

Ian S Reynolds BSc MRICS

Haston Reynolds Ltd

June 2019

