

Your Ref: P/2016/0327  
Our Ref: 1502/CV/LF

17 May 2016

Matthew Phillips  
Planning Officer  
Environment and Planning  
Wrexham County Borough Council

By email only: Matthew.Phillips@wrexham.gov.uk

Dear Matthew,

**PLANNING APPLICATION P/2016/0327: VARIATION TO CONDITION NOS. 2 AND 3 OF PLANNING APPEAL REF NO. APP/H6955/A/12/2188910 TO EXTEND THE TIME LIMITS FOR SUBMISSION OF RESERVED MATTERS APPLICATION AND FOR COMMENCEMENT OF DEVELOPMENT BY A FURTHER 3 AND 5 YEARS RESPECTIVELY**

Following your email dated 09 May 2016 and our subsequent conversations, I am writing to provide further information on the current proposals. As you know consent was previously granted for major scale warehouse development on the site with the intended occupier being Norbert Dentressangle Limited (NDL). Since the permission was granted, NDL have again been taken over, on this occasion by XPO Logistics which became public in April/May 2015. Due to this takeover, a final decision regarding expansion on the land subject to the permission, cannot be made at the present time. It is however critically important that the permission remains extant and available at such times that XPO decides to progress with the approved plans.

For clarification, the land ownership of Kingmoor Park Properties Limited (KPPL) at Wrexham has historically been marketed by agents Matthews and Goodman who are specialists in the industrial and distribution sector. This was the case throughout the recent planning history of the sites at Bryn Lane and there has been no material change in this regard. Due to this occasionally enquiries are received. It is our understanding that there has been further interest from other potential major user occupiers in the application site who require a large level site with excellent transport links and that the Council may be aware of such interest. In our view this only serves to demonstrate that there is no other suitable available land in Wrexham for these purposes, as was the conclusion reached by the appeal Inspector. It is of note that the Council is actively promoting a significant extension to the Industrial Estate, in the vicinity of the application site, to cater for the qualitative deficiency in employment land in the Borough, further highlighting the material planning benefits of the planning consent.

As noted in the covering letter for the application, the justification for the development has been reinforced through the strengthening of national guidance with a focus on delivery of sustainable development and promoting economic growth. TAN 23 has been adopted, which reiterates the need expressed in Planning Policy Wales to guide economic development to the most appropriate locations rather than prevent or discourage such development. Paragraphs 2.1.5-2.1.14 of TAN 23 set out three tests to help balance the economic, social and environmental issues. The three tests are set out below:

**Planning and Environmental Advisers**

**Partners:**

Gary Halman BSc FRICS MRTPI  
Richard Woodford BA (Hons) BSc BTP MRICS MRTPI  
Jon Suckley MTCP (Hons) MRTPI  
Richard Barton BSc (Hons) MA MRTPI  
Fiona Woodford  
Julie Halman

**Associates:**

Daniel Brown BA DipTP MRTPI  
Keith Jones BA (Hons) MSc MRTPI  
Chris Peacock BSc MA CEnv MIEMA  
Conor Vallyelly MTCP MRTPI

**HOW Planning LLP**

Registered Office: 40 Peter Street, Manchester M2 5GP  
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***Alternatives: if the land is not made available (the site is not allocated, or the application is refused), is it likely that the demand could be met on a site where development would cause less harm, and if so where?***

As identified in the appeal that granted permission (ref: APP/H6955/A/12/2188910), there are no other suitable and available sites for NDL's expansion in Wrexham. The land to the south of the site is not a suitable alternative location as it is not available to NDL and continues to be promoted by Skelton Group for a power station proposal. KPPL's position is that there are no other suitable and deliverable sites of the scale and quality of the application site which could accommodate the proposals elsewhere within the County Borough. This position remains unaltered.

Whilst there is a quantitative oversupply of employment land in the Borough, not all of the supply for large scale development is of good quality and therefore suitable for business today, as recognised by GVA Grimley who undertook a Borough wide employment land review in 2007 and BE Group who have undertaken a revised Review in 2015. The most recent Joint Employment Land Review states:

*"...although there is no overall need for either Council to identify further land allocations in the period to 2030, there is an exception with Wrexham Industrial Estate where high demand, combines with a constrained overall land supply (See Section 10.0). In order to address this issue, consideration should be given to identifying additional land on Wrexham Industrial Estate, exclusive of ecological mitigation, which may require the provision of mitigation land elsewhere"*

The position has therefore not changed since the evidence was presented at the appeal and to the contrary the deficiencies in employment land supply at Wrexham Industrial Estate have been identified and responded to the plan marking process. No alternative site can be considered to be realistically available or deliverable and no further sites have been identified in the intervening period.. As identified above the planning permission is intended for NDP/EXPO the timing of which will be subject to their decision to progress with expansion however even in the scenario where the expansion does not materialise, the major planning benefits of development more than outweigh any negative consequences in terms of socio economic benefits and other factors as identified below.

***Jobs accommodated: how many direct jobs will be based at the site?***

It is clear that there are overriding economic benefits to the proposals. They will help to retain existing jobs within the County Borough and provide the opportunity for significant new job creation. The proposals are in line with national planning policy in particular the vision for North East Wales as set out in the Wales Spatial Plan. This seeks to build on the strengths of the local economy and to reduce socio-economic inequalities. Employment statistics show that approximately 18.3% (2011 census) of local people are employed in the manufacturing sector, which is recognised to be a declining sector of the economy. The proposals will however offer new job opportunities in a related sector, requiring a similar level of skills and can therefore be seen to be particularly relevant for Wrexham.

The proposals can also be seen as an opportunity to raise the economic profile of Wrexham and in particular Wrexham Industrial Estate. Investment on this scale by a major company has the potential to act as a catalyst for the estate in a wider sense by demonstrating that is an attractive location for employers and helping to put Wrexham 'on the map'. Therefore, these clear economic benefits of the proposals are significant material considerations.

**Special merit: would the development make any special contribution to policy objectives?**

The 'North Wales Local Authorities - Economic Ambition: A Strategy for Change' (2014) sets out a vision for the region which seeks to improve productivity, competitiveness and growth in the North Wales Economy. It identifies four strategic issues, including 'economic leadership' and 'rebalance the economy to increase growth and productivity'. The approval of the proposals would be in line with the action programme for this, by supporting businesses to realise their growth aspirations, encouraging inward investment, and by developing a key sector (manufacturing).

In addition, the current proposals would make a special contribution to objectives of Planning Policy Wales, more specifically paragraph 7.1.3:

*"The planning system should support economic and employment growth alongside social and environmental considerations within the context of sustainable development. To this end, the planning system, including planning policies, should aim to ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses. Local planning authorities should aim to facilitate the provision of sufficient land required by the market, except where there are good reasons to the contrary. In addition, wherever possible local planning authorities should seek to guide and control economic development to facilitate regeneration and promote social and environmental sustainability. In so doing, they should aim to:*

- co-ordinate development with infrastructure provision;*
- support national, regional, and local economic policies and strategies;*
- align jobs and services with housing, wherever possible, so as to reduce the need for travel, especially by car;*
- promote the re-use of previously developed, vacant and underused land; and*
- deliver physical regeneration and employment opportunities to disadvantaged communities"*

On the map below, the yellow star represents the application site. The red areas denote the 4 LSOAs within the top 10% most deprived in Wales<sup>1</sup> (Wrexham 010B, Wrexham 010C, Wrexham 010D, Wrexham 010E). The pink areas denote the Census Area Statistic (CAS) wards within 5km of the development site (Acton, Borrass Park, Cartrefle, Hermitage, Holt, Maesydre, Queensway, Rhosnesni, Smithfield, Whitegate, Wynnstay). Note the large ward covering the east of Wrexham, Holt ward, is largely rural (apart from the industrial estate), hence its size and reach.

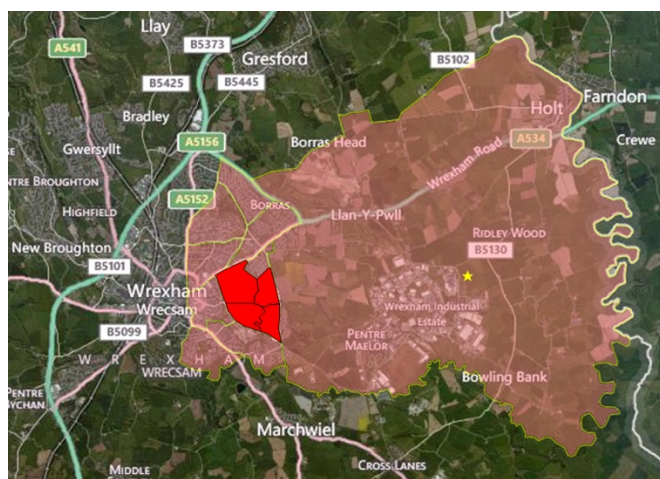


Image Source: Bing Maps/Mapinfo ©

The 2014 Wales Index of multiple deprivation (WIMD)<sup>1</sup> is only available at LSOA level, not ward. The IMD ranks these four neighbourhoods as being in the top 10% most deprived in Wales – in fact two out of the four neighbourhoods are in the top 5% most deprived.

There are seven domains which make up the overall IMD score and then rank position. The income and employment domains are the highest weighted domains, accounting for 47% of the final IMD score. With low household incomes and higher levels of worklessness within these neighbourhoods, their IMD ranking reflects these aspects of deprivation. Poor health levels and low educational attainment and skills are also major contributors to these neighbourhoods' levels of multiple deprivation.

| Top 10% most deprived neighbourhoods – IMD Overall Rank and Other Domains, Wales IMD, 2014 <sup>1</sup> |              |              |              |              |
|---------------------------------------------------------------------------------------------------------|--------------|--------------|--------------|--------------|
| LSOA Name                                                                                               | Wrexham 010B | Wrexham 010C | Wrexham 010D | Wrexham 010E |
| LSOA Code                                                                                               | W01000353    | W01000413    | W01000414    | W01000425    |
| WIMD Rank                                                                                               | 128          | 3            | 108          | 52           |
| WIMD % Rank                                                                                             | 7            | 1            | 6            | 3            |
| Income Rank                                                                                             | 124          | 5            | 123          | 93           |
| Income % Rank                                                                                           | 7            | 1            | 7            | 5            |
| Employment Rank                                                                                         | 236          | 17           | 307          | 123          |
| Employment % Rank                                                                                       | 13           | 1            | 17           | 7            |
| Health Rank                                                                                             | 332          | 79           | 199          | 75           |
| Health % Rank                                                                                           | 18           | 5            | 11           | 4            |
| Education Rank                                                                                          | 35           | 2            | 41           | 6            |
| Education % Rank                                                                                        | 2            | 1            | 3            | 1            |
| Housing Rank                                                                                            | 125          | 170          | 205          | 79           |
| Housing % Rank                                                                                          | 7            | 9            | 11           | 5            |
| Environment Rank                                                                                        | 1667         | 773          | 1005         | 689          |
| Environment % Rank                                                                                      | 88           | 41           | 53           | 37           |
| Access to Services Rank                                                                                 | 751          | 435          | 330          | 922          |
| Access to Services % Rank                                                                               | 40           | 23           | 18           | 49           |
| Community Safety Rank                                                                                   | 102          | 15           | 45           | 43           |
| Community Safety % Rank                                                                                 | 6            | 1            | 3            | 3            |
| Source: WIMD, 2014                                                                                      |              |              |              |              |

<sup>1</sup> Welsh Index of Multiple Deprivation (<http://gov.wales/statistics-and-research/welsh-index-multiple-deprivation/?lang=en>)

## Summary

In summary, relevant planning policy supports the application and further justifies the reasoning for renewing the permission. It is clear that there are no suitable and available alternative sites, as proven by the Council's most recent Local Development Plan evidence. The proposals will assist with the policy objectives of Planning Policy Wales, giving them special merit through promoting social and environmental sustainability by providing employment opportunities to disadvantaged communities.

It is the applicants position that there is therefore no reason why planning permission P/2011/0891 should not be renewed through the variation to Condition nos. 2 and 3 of Planning Appeal ref no. APP/H6955/A/12/2188910 to extend the time limits for submission of reserved matters application and for commencement of development by a further 3 and 5 years respectively.

Best regards,

A handwritten signature in dark ink, appearing to read 'Fielden'.

**Louisa Fielden**

**Graduate Planner**

Direct Dial: 0161 831 5882

Email: [louisa.fielden@howplanning.com](mailto:louisa.fielden@howplanning.com)