

**FORMER MAELOR CREAMERY SITE
PICKHILL LANE, CROSS LANES, WREXHAM**

**PLANNING APPLICATION FOR CHANGE OF USE
FROM CHEESE CUTTING AND PACKING FACILITY TO
POULTRY PROCESSING FACILITY**

PLANNING STATEMENT

Submitted on behalf of

MAELOR POULTRY LTD

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1.0 INTRODUCTION

1.1 Introduction

- 1.0.1 This statement is being submitted in support of a planning application for change of use from existing cheese cutting and packing facility to poultry processing facility at the former Maelor Creamery site, Cross Lane, Wrexham.
- 1.0.2 The statement describes the site and its surrounds, before setting out the planning policy context under which the application should be considered. The planning merits of the proposal are then examined and the conclusion is reached that there are no material considerations which indicate that planning permission should not be granted.

1.2 Background

- 1.2.1 The applicant, Maelor Poultry, is a newly formed subsidiary company to parent company Salisbury Poultry (Midlands) Limited, who this year are celebrating their 25th anniversary.
- 1.2.2 The parent company, Salisbury Poultry (Midlands) Limited, established in 1989, pride themselves on family values and traditions. Currently they purchase all their raw product from independent slaughter houses and wish to invest to acquire their own prestigious facility. All to ensure full control of humane processing in a state of the art hygienic environment for the highest quality product with full traceability from the farm to the fork.
- 1.2.3 Salisbury Poultry is a successful, progressive, caring and flexible company that works with its suppliers to provide total customer satisfaction. Using premium quality 'A' Grade chickens they have gained an enviable reputation for a dynamic service ensuring that customer needs are always achieved.
- 1.2.4 Presently, Salisbury Poultry operates from three modern sites, having grown its turnover from £5 million in 1999 to in excess of £60 million in 2014 with a workforce of 400 full time employees.

After years of successful growth, the Company has continued with strong values, an excellent customer base along with financial stability and a strong and knowledgeable workforce.

History

1989 – The beginning.

- 1.2.5 Salisbury Poultry is a privately owned company that started in Darlaston, West Midlands with 10 employees, supplying both local wholesalers and restaurants. Within a short period the company had grown to 35 employees with a turnover of £5 million. In 1997, the continued growth led the company to purchase larger premises in Hare Street, Bilston. This new facility was completely refurbished to the highest standards over the next 9 months at a cost of £1.5 million and bought new customers and more employees. Continued commitment allowed the company to grow and expand.

2000 – Growing into the new millennium

- 1.2.6 In 2000, the company expanded further and the second site based at Field Street, Bilston, occupying 25,000 ft., was purchased. These premises, which consist of 2 separate facilities, have been utilised to produce thigh meat and EU products, adding further to the range of products that they are able to offer.

2008 – Further growth and acquisition of premises at Vulcan Road

- 1.2.7 With continued growth over the coming years, the company acquired its third site in 2008, at a cost of £1.3 million, sited adjacent to the existing Hare Street facility in Vulcan Road. Over the next 18 months this site was refurbished to provide production facilities including a cutting hall, cold stores, holding freezers, chillers, retail packing areas, intake and a distribution centre. In addition, the Company has heavily invested in computer controlled equipment and new technology

2010 – New HQ

- 1.2.8 They moved into their current offices, based in Vulcan Road in 2010, creating an advanced administration centre to serve both new and existing customers more readily.

2014 – Investment at Hare Street

- 1.2.9 At the start of 2014 the decision was made to close Hare Street, which had been operating since 1989, to allow the refurbishment of the site. The modernisation has been completed and the site has now reopened offering greater production capacity.
- 1.2.10 The Company's resources are built around the ability to supply their customers to meet their requirements, specification, presentation and volume at the required time.

Next Steps

- 1.2.11 It is evident from their Product Range, which is extensive, that they are able to adapt to customer needs. They believe, such flexibility, capability and commitment is the unique combination that makes customers choose Salisbury Poultry as their poultry partner. It is with this ethos in mind that Salisbury Poultry are looking to expand their business, both operationally and geographically, hence the purchase of the former Maelor Creamery site in Wrexham and establishing the sister company of Maelor Poultry. Opening up the supply chain and taking full control of the operation, inclusive of slaughterhouse element, is integral to growth of the business.

1.3 ACCREDITATIONS

- 1.3.1 Salisbury Poultry are accredited by the following organisations. They have numerous farming partners supplying 'Red Tractor' British poultry, with full traceability including HACCP. They are also able to offer EU poultry portions if required, being processed at a dedicated site.
- 1.3.2 Each of their partners are audited and are also subject to independent and regular audits so that they can ensure animal welfare and food safety.

SAi Global / A+



- 1.3.3 SAI Global is the premier third party independent inspection and certification service, providing retailers, manufacturers, farmers and caterers, throughout the world. With expert inspection and certification of their operations to ensure that only the highest standards are maintained.
- 1.3.4 Salisbury Poultry are delighted to confirm that they have been awarded A + accreditation against the Sai Global BRC standards. Sai Global also inspect against various industry quality assurance schemes, covering an extensive range of products.

British Red Tractor



- 1.3.5 Red Tractor is a food assurance scheme which covers production standards developed by experts on safety, hygiene, animal welfare and the environment amongst other things. The Red Tractor

logo on pack means your food or drink has met these responsible production standards and is fully traceable back to independently inspected farms in the UK.

BRC



- 1.3.6 BRC is a leading safety and quality certification program, used by over 21 000 certificated suppliers in 90 countries. The standards guarantee the standardisation of quality, safety and operational criteria and ensure that manufacturers fulfil their legal obligations and provide protection for the end consumer. BRC global standards are now often a fundamental requirement of leading retailers.

2.0 SITE CONTEXT

- 2.0.1 The site is located south of the village of Cross Lanes off Pickhill Lane, a secondary road off the main A525. The operational part of the site extends to 7.0 ha, which is principally covered with buildings and hardstanding, however the total land ownership extends to 16.89 ha, which includes a large element of landscaping and open areas. The site is centred at grid reference 38621, 46710.
- 2.0.2 The site is located close to Cross Lanes and Bangor on Dee. The site itself is at the eastern side of Pickhill Lane, Wrexham and falls within the ward of Marchwiell. It is bounded on all sides by agricultural land, with a small number of dwellings opposite the site on the western side of Pickhill Lane.
- 2.0.3 There are two existing access points on Pickhill Lane; the main one being at the western end of the site. This access includes a security station, which is able to check vehicles in and out of the site and direct them to the appropriate area within the facility. All delivery vehicles use this entrance to enter and exit the site. All entrances and car parks have security gates, which can be closed as required. The northern exit is kept closed and is opened on demand.
- 2.0.4 The site has historically been used as a creamery

2.1 PLANNING HISTORY

- 2.1.1 The site benefits from a planning permission for 'demolition of existing factory buildings and construction of new cheese cutting and packing plant including offices together with chill storage warehouse' (ref: P/2011/0750). The total proposed floor space associated with this permission is circa. 19,000 m². All existing buildings on site were to be demolished in conjunction with the phased development of the site.

3.0 PROPOSED DEVELOPMENT

3.1 The aspiration is to utilise the existing production and administration buildings at the former creamery site at Maelor to establish a new poultry processing facility catering to the existing client base and looking to expand upon it. Subject to planning approval, the proposed new facility at Maelor is expected to be operational by the end of 2015. When fully operational, the facility would employ up to 150 people, with capacity to process in the region of 122 tonnes of poultry per day. The facility will operate as a 'complete' production-line facility, inclusive of slaughterhouse. The newly established facility would be state of the art, meeting stringent Environmental guidelines and regulations applied to food production industries such as this.

3.2 Currently Salisbury Poultry serve the following market sectors:

- Retail
- Food Service
- Ready Meal Manufacturers
- Catering and Wholesale

3.3 Currently Salisbury Poultry supply, amongst others, the following companies:

- Brake Brothers
- Samworth Group
- Kerry Food Group
- Compass
- Greencore
- Asda
- Lidl
- Benson Group

- 3.4 It is evident from their Product Range, which is extensive, that they are able to adapt to customer needs. They believe, such flexibility, capability and commitment is the unique combination that makes customers choose Salisbury Poultry as their poultry partner. It is with this ethos in mind that Salisbury Poultry are looking to expand their business, both operationally and geographically, hence the purchase of the former Maelor Creamery site in Wrexham and establishing the sister company of Maelor Poultry. Opening up the supply chain and taking full control of the operation, inclusive of slaughterhouse element, is integral to growth of the business. With the new facilities, it will give them scope to service the major retailers.
- 3.5 At present Salisbury Poultry are limited to the cutting and packing of poultry products, the birds being sourced via a network of Suppliers. Going forward they need to be in a position to service the demand from an ever increasing customer base and take full control of the processing operation, ensuring traceability from the farm to the fork.
- 3.6 At present they do not wholesale birds and this would give them another market opportunity. The new facilities would mean that they will be able to add to and control their bird supply and take a step to be vertically integrated.

4.0 PLANNING POLICY CONTEXT

- 4.0.1 This section provides an overview of the national, regional and local planning policies that are relevant to the re-development.

4.1 RELEVANT PLANS AND POLICIES

- 4.1.1 The statutory development plan for the application site currently consists of the saved policies of the Wrexham Unitary Development Plan (adopted February 2005). Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.1.2 Local planning authorities in Wales are required to prepare development plans and these should contain the policy of the Welsh Assembly Government. Development Plans provide certainty and consistency for decisions about developments and determination of planning applications.
- 4.1.3 The Planning and Compulsory Purchase Act 2004 requires that local planning authorities move away from the old style plans known as 'Unitary Development Plans' (UDPs) and replace them with new 'Local Development Plans' (LDPs). Policy on the LDPs is published in Local Development Plans Wales (LDPW) and practical guidance in the Local Development Plan Manual.
- 4.1.4 The Welsh Assembly Government's (WAG) land use planning policies are set out in Planning Policy Wales (PPW), plus Technical Advice Notes, Circulars and Ministerial Interim Planning Policy Statements. The need to achieve sustainable development is at the heart of the aims of the policy guidance and the four broad objectives are:
- Social progress that recognises the needs of everyone;
 - Maintaining high and stable levels of economic growth and employment;
 - Effective protection of the environment; and
 - Prudent use of natural resources.

4.2 NATIONAL PLANNING GUIDANCE

Planning Policy Wales (Edition 7, July 2014)

Chapter 4 – Planning for Sustainability

- 4.2.1 **Key policy objectives** - planning policies and proposals should; support initiative and innovation and avoid placing unnecessary burdens on enterprises (especially small and medium sized firms) so as to enhance the economic success of both urban and rural areas, helping businesses to maximise their competitiveness.
- 4.2.2 **Preference for the re-use of land** - previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high agricultural or ecological value. The Assembly Government recognises that not all previously developed land is suitable for development. This may be, for example, because of its location, the presence of protected species or valuable habitats or industrial heritage, or because it is highly contaminated. For sites like these it may be appropriate to secure remediation for nature conservation, amenity value or to reduce risks to human health.
- 4.2.3 Many previously developed sites in built-up areas may be considered suitable for development because their re-use will promote sustainability objectives. This includes sites:
- in and around existing settlements where there is vacant or under-used land, commercial property or housing;
 - in suburban areas close to public transport nodes which might support more intensive use for housing or mixed use;
 - which secure land for urban extensions; and
 - which facilitate the regeneration of existing communities.
- 4.2.4 If the Assembly Government's objectives for the more sustainable use of land and buildings and the re-use of previously developed sites are to be achieved, local authorities and other stakeholders will need to be more proactive.

Definition of Previously Developed Land

- 4.2.5 Previously developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure. The curtilage of the development is included, as are defence buildings, and land used for mineral extraction and waste disposal where provision for restoration has not been made through development control procedures.
- 4.2.6 Excluded from the definition are:
- land and buildings currently in use for agricultural or forestry purposes;
 - land in built-up areas which has not been developed previously, for example parks, recreation grounds and allotments, even though these areas may contain certain urban features such as paths, pavilions and other buildings;
 - land where the remains of any structure or activity have blended into the landscape over time so that they can reasonably be considered part of the natural surroundings;
 - previously developed land the nature conservation value of which could outweigh the re-use of the site; and
 - previously developed land subsequently put to an amenity use.

Objectives of Good Design

- 4.2.7 The design principles and concepts that have been applied to these aspects should be reflected in the content of any design and access statement required to accompany certain applications for planning permission and listed building consent, and are important material considerations.
- 4.2.8 Good design is also inclusive design. The principles of inclusive design place people at the heart of the design process, acknowledges diversity and difference, offers choice where a single design solution cannot accommodate all users, provides for flexibility in use, and provides buildings and environments that are convenient and enjoyable to use for everyone.

- 4.2.9 Good design should promote the efficient use of resources, including land. It should seek to maximise energy efficiency and the efficient use of other resources, minimise the use of non-renewable resources and minimise the generation of waste and pollution. Ways to achieve this include, for example, site selection and treatment and the application of whole life costing in construction.
- 4.2.10 Good design should ensure that development contributes to tackling the causes of climate change (by reducing greenhouse gas emissions) and to effective adaptation to the consequences of climate change. An integrated and flexible approach to design, including location, density, layout and built form, will be an appropriate way of contributing to climate responsive development.
- 4.2.11 Mixed use development (of both built and open space) emphasising flexibility and adaptability, can provide particular design opportunities, adding interest and vitality to living and working environments. At the same time, good design is important for the success of relatively compact mixed use developments, for example, in helping to keep noise levels low.
- 4.2.12 Good design is essential to ensure that areas, particularly those where higher density development takes place, offer high environmental quality, including open and green spaces. Landscape considerations are an integral part of the design process and can make a positive contribution to environmental protection and improvement, for example, to biodiversity, climate protection, air quality and the protection of water resources.
- 4.2.13 The visual appearance of proposed development, its scale and its relationship to its surroundings and context are material planning considerations. Local planning authorities should reject poor building and contextual designs. However, they should not attempt to impose a particular architectural taste or style arbitrarily and should avoid inhibiting opportunities for innovative design solutions.
- 4.2.14 In areas recognised for their landscape, townscape or historic value, such as National Parks, Areas of Outstanding Natural Beauty and conservation areas, and more widely in areas with an

established and distinctive design character, it can be appropriate to seek to promote or reinforce traditional and local distinctiveness. In those areas the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building

Chapter 7 – Economic Development

4.2.15 The Assembly Government's objectives for economic development are to:

- enhance the economic success of both urban areas and the countryside, helping businesses to maximise their competitiveness;
- support initiative and avoid placing unnecessary burdens on enterprise;
- respect and encourage diversity in the local economy, for example in rural areas encouraging farm diversification and in urban areas promoting mixed use development;
- promote the exploitation of new technologies which can provide new opportunities; and
- ensure that development for enterprise and employment uses is in line with sustainability principles and respects the environment in its location, scale and design, especially so as to address climate change.

4.2.16 Local planning authorities are required to ensure that the economic benefits associated with a proposed development are understood and that these are given equal consideration with social and environmental issues in the decision-making process, and should recognise that there will be occasions when the economic benefits will outweigh social and environmental considerations.

Development management and the economy

4.2.17 Local planning authorities should adopt a positive and constructive approach to applications for economic development. In determining applications for economic land uses authorities should take

account of the likely economic benefits of the development based on robust evidence. In assessing these benefits, key factors include:

- the numbers and types of jobs expected to be created or retained on the site;
- whether and how far the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing employment opportunities or upgrading the environment;
- a consideration of the contribution to wider spatial strategies, for example for the growth or regeneration of certain areas.

4.2.18 When considering planning applications which have economic development potential, local planning authorities should seek the views of all relevant local authority departments and particularly from Economic Development Officers as this can assist in the identification of economic benefits.

Chapter 8 - Transport

Development management and transport

4.2.19 When determining a planning application for development that has transport implications, local planning authorities should take into account:

- the impacts of the proposed development on travel demand;
- the level and nature of public transport provision;
- accessibility by a range of different transport modes;
- the willingness of a developer to promote travel by public transport, walking or cycling, or to provide infrastructure or measures to manage traffic, to overcome transport objections to the proposed development (payment for such measures will not, however, justify

granting planning permission to a development for which it would not otherwise be granted);

- the environmental impact of both transport infrastructure and the traffic generated (with a particular emphasis on minimising the causes of climate change associated with transport); and
- the effects on the safety and convenience of other users of the transport network.

4.2.20 **Transport Assessments (TA)** are an important mechanism for setting out the scale of anticipated impacts a proposed development, or redevelopment, is likely to have. They assist in helping to anticipate the impacts of development so that they can be understood and catered for. The Welsh Assembly Government expects that all applications for developments (including changes of use) falling into the following categories will be accompanied by a TA:

Use Threshold - Business > 2,500m² gross floor area

Chapter 13 – Minimising and managing Environmental Risks and Pollution

Development Management and Flood Risk

4.2.21 In determining applications for development, local planning authorities should work closely with the Natural Resource Wales, drainage bodies, sewerage undertakers, prospective developers and other relevant authorities to ensure that surface water run-off is to be controlled as near to the source as possible by the use of sustainable urban drainage systems. They should also ensure that development does not:

- increase the risk of flooding elsewhere by loss of flood storage or flood flow route; or
- increase the problem of surface water run-off.

4.3 TECHNICAL ADVICE NOTES

TAN 12 – DESIGN

- 4.3.1 Good design is not inevitable. It requires a collaborative, creative, inclusive, process of problem solving and innovation - embracing sustainability, architecture, place making, public realm, landscape, and infrastructure.



- 4.3.2 Opportunities for **innovative design** will depend on the existing context of development and the degree to which the historic, architectural, social or environmental characteristics of an area may demand or inhibit a particular design solution. Thorough appraisal of context can provide design pointers, which help to inspire an innovative design response, which meets present and future needs. A contextual approach should not necessarily prohibit contemporary design.
- 4.3.3 Appraisal of the **landscape** should focus on its quality in terms of geology and geomorphology, vegetation and habitats, visual and sensory quality and historic and cultural quality. “LANDMAP” is one method of assessment which has the potential to provide a framework and information base from which good design and management can be developed. Historic Landscape Characterisation provides a more detailed level of assessment for the historic environment, and studies have been carried out for all of the areas included in the Register of Landscapes of Historic Interest in Wales. Further detailed site appraisals may also provide information on local hydrology, microclimate, soils, plant communities and features, and all visual qualities including views and vistas.

Employment and Commercial Areas

- 4.3.4 The design of employment areas is important, as high quality of design can add value to commercial property, support the image of modern businesses and encourage further investment. Early consideration of the need to embrace high environmental standards, low carbon aspirations and minimise the need for artificially cooled buildings, provide opportunities to develop shared low carbon and renewable energy options.
- 4.3.5 Large new employment buildings can often make a bold statement of their purpose. Recognising the functionality of business premises is important to ensure they contribute to the economic success of the occupier. However, robust design, high quality materials, flexibility of exterior and interior layout and appropriate landscape treatment such as earth form or planting, can help to integrate new business premises into their surroundings, minimise the need to artificially cool buildings and allow for easier conversion by successive occupiers. Service and utility features, exposed and imaginatively detailed, may in many cases provide elements of interest in otherwise

plain facades. The need to consider the building and landscape maintenance processes once the development is completed is also essential to ensure that the development remains integrated.

- 4.3.6 Where employment premises are grouped together, a sufficient scale of planting and earth forms is essential, to absorb the bulk of the building, ancillary circulation, and parking areas. Opportunities to minimise energy demand through the adoption of renewable energy or low carbon technology such as district heating schemes including CHP running on low carbon fuel, should be realised. Mixed employment uses would improve the feasibility and viability of such schemes and care should be taken to avoid the creation of insular estates. Efforts should be made to present a positive, outward looking image by ensuring key buildings within the development front onto roads and help improve connectivity. Accommodating parking within courtyard layouts can help to reduce the overall visual impact of parking areas. Separate, safe and attractive routes for pedestrians and cyclists, and high quality facilities for public transport should be incorporated. Low maintenance regimes will be particularly important in mixed occupancy areas.

Design and Access Statements

- 4.3.7 It is a statutory requirement that applications for planning permission and listed building consent (with exceptions) are accompanied by a design and access statement (DAS). Further guidance relating to the requirement for a design and access statement is included in appendix 1 of TAN 12.
- 4.3.8 The DAS is a communication tool explaining how the objectives of good design (which include the principles of inclusive design) have been considered from the outset of the development process.
- 4.3.9 In relation to design, a DAS must explain the design concepts and principles applied to the development or works. A DAS accompanying an outline or full planning application must explain the concepts and principles in relation to (as a minimum):

➤ **Access;**

- **Character** (including amount, layout, scale, appearance and landscaping);
- **Community safety;**
- **Environmental sustainability; and**
- **Movement to, from and within the development.**

TAN 23 – ECONOMIC DEVELOPMENT

4.3.10 Planning Policy Wales (PPW) defines economic development broadly so that it can include any form of development that generates wealth, jobs and income. In producing development plans or determining planning applications local planning authorities need to bear in mind that traditional business use, classes B1-B8, only account for part of the activity in the economy. It is important that the planning system recognises the economic aspects of all development and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations.

4.3.11 In the full context of PPW, therefore:

- Economic development is development (new or change of use) where the resulting space will be occupied by economic activities;
- An economic activity, or economic land use, is an activity which directly generates wealth (output), jobs and income;
- Generating jobs includes providing or sustaining existing jobs as well as creating new jobs.

Planning for Economic Development

4.3.12 It should not be assumed that economic objectives are necessarily in conflict with social and environmental objectives. Often these different dimensions point in the same direction. Planning should positively and imaginatively seek such ‘win-win’ outcomes, where development contributes to all dimensions of sustainability.

4.4 LOCAL PLANNING POLICY

- 4.4.1 The existing adopted policy document for Wrexham County Borough is the Wrexham Unitary Development Plan. The Unitary Development Plan (UDP) 1996 - 2011 was adopted by Wrexham County Borough Council on the 14th February 2005. The Plan covers the administrative area of the Wrexham County Borough Council. It supersedes previous adopted development plans, namely the Wrexham Maelor Local Plan: Forward to 2001, the Glyndwr District Local Plan, and the Clwyd Structure Plan: First Alteration.

WREXHAM UNITARY DEVELOPMENT PLAN (2005)

Social, Economic and Environmental Concerns

- 4.4.2 The following policies are considered of material consideration to this application:
- 4.4.3 **Policy GDP1** requires that all new development should:-
- a) Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.
 - b) Take account of personal and community safety and security in the design and layout of development and public / private spaces.
 - c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources.
 - d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.
 - e) 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.

- f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.
- g) Secure public services (e.g. gas, water, electricity) to development at minimum public cost.
- h) 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.
- i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site.
- j) Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity from development that could harm this identity.
- k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.

4.4.4 **Policy EC12** states that development (including the raising of land) within defined flood plains will only be permitted if it:-

- a) would not be subject to an unacceptable risk of flooding on-site; and/or
- b) does not result in an unacceptable risk of flooding on or off-site; and/or
- c) does not adversely affect flood management or maintenance schemes.

4.4.5 **Policy E3** states that land is allocated at Owens Corning Fibreglass, Wrexham Industrial Estate for a major single user employment project that requires a site of over 30 hectares for an employment development that cannot be accommodated on allocated employment land or employment land with planning permission. Any development proposed will need to incorporate extensive high quality landscaping in order to mitigate the visual impact of the development on the appearance of the neighbouring countryside and local landscape.

4.4.6 **Policy PS2** requires that development must not materially detrimentally affect landscape/townscape character, open space or the quality of the natural environment.

- 4.4.7 **Policy PS3** states development should use previously developed land comprising vacant, derelict or underused land in preference to the use of Greenfield land, wherever possible.
- 4.4.8 **Policy PS4** states development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car.
- 4.4.9 **Policy T8** states that development granted planning permission will be required to provide vehicle parking spaces either on site or nearby, in accordance with Council's current parking standards. Special regard will be paid to the following factors, as appropriate:
- The availability of public interest of public transport nearby;
 - Proximity to public car parking;
 - Proximity to local services and facilities; and
 - Road safety hazards and amenity considerations arising from on street parking in the vicinity of the site.
- 4.4.10 Where implementation difficulties arise in making parking provision on site or nearby, the Council will require a developer to make financial contributions for measures to assist public transport, or walking and cycling as appropriate.

4.5 EMERGING POLICY

Wrexham County Borough Council LDP (2)

4.5.1 Further to LDP1 being withdrawn, Wrexham County Borough Council is preparing the Local Development Plan (LDP2), which will replace the current adopted Unitary Development Plan. The LDP will be a long-term land use and development strategy focused on achieving sustainable development and will:

- guide development for housing, employment, retail and other uses;
- set out policies that will be used to decide planning applications; and
- safeguard areas of land requiring protection or enhancement.

4.5.2 At this juncture, there is no draft documentation to make reference to. The Council have a delivery agreement and have undertaken a call for sites only.

5.0 PLANNING ISSUES / MERITS

5.1 Principle of Development

- 5.1.1 In considering the acceptability of the proposed development, the starting point is determining the level of compliance with the relevant national and local planning policy guidance. If it can be demonstrated that the proposal meets this guidance then in principle, and subject to site specific considerations, the development can be supported and the planning application approved.
- 5.1.2 The basis of the development control system requires that proposed development is considered within its context and that applications are determined on a site specific basis on individual merits. It is therefore appropriate to consider the proposed development as a whole, not only the physical impact of new development within the surrounding environment, but also its impact upon socio-economic matters and commercial viability.
- 5.1.3 In this respect the existing development on site and its historic industrial use is of particular significance. The site is previously developed land / brownfield land and is therefore, in principle, suitable for re-use for commercial purposes.
- 5.1.4 As an existing general industrial site with a range of established buildings and structures, an industrial economic use is considered entirely appropriate. Any development seeking to retain this use is acceptable in principle and should be determined on its merits and upon compliance with the relevant planning policy guidance and other material considerations.
- 5.1.5 In this instance those material considerations predominantly relate to highways / transport, socio-economics, noise, air quality and flood risk, each of which (except for socio-economics) has been addressed through appropriate survey work and associated reports.
- 5.1.6 Therefore the general principle of development is established, subject to the above considerations, which are now considered.

5.2 Highways / Transport

- 5.2.1 The site has previously operated as a food preparation and production site and has a planning approval (Ref: P/2011/0750) associated with the demolition of factory buildings, construction of a new cutting and packing plant and a new chill store warehouse. Although this was not progressed to construction, the consent still remains valid.
- 5.2.2 The development proposals consist of a change of use from existing cheese cutting and packing facility to poultry processing facility.
- 5.2.3 The operation of the site will be similar to the previous cheese packing operation in terms of operational hours and shift patterns.
- 5.2.4 Staff numbers associated with the development proposals are anticipated to be lower than both previous and approved operation.
- 5.2.5 Operational vehicle movements are anticipated to be similar to previous operations with around 29 HGV movements throughout the day in dedicated time slots avoiding the network peak periods.
- 5.2.6 There is no historic record of accidents on Pickhill Lane and no other accidents on the highway network that are related to the historic use of the site.
- 5.2.7 A Framework Travel Plan has been included, which sets out a format for a Travel Plan to be introduced at the site prior to occupation of the new facilities.
- 5.2.8 It is concluded that the proposals will result in an overall reduction in vehicular trips along the A525, and that there are no transportation or highways matters that should preclude the granting of planning permission.

5.3 Socio - Economic Issues

- 5.3.1 With any application for economic development the impacts and benefits of the proposals should be taken into consideration when applying the criteria set out in planning policy guidance. A suitable balance must be struck between the need to effectively manage land use and development, provide a supply of land for employment uses and support existing business and the need to modernise, expand, and remain commercially viable.
- 5.3.2 It is in this context that the proposals have been brought forward, based upon the need of the site operator to take their business operation forward and ensure they maintain their position in what is becoming an ever competitive market place. Continued investment in the business to develop an additional modern and efficient facility is paramount.
- 5.3.3 Furthermore the development will result in the creation of new local employment opportunities, providing up to 150 new jobs, at a site that is currently vacant and does not contribute to local employment levels at all.
- 5.3.4 The proposed development is in line with the principles set out in both national and local planning in that it supports the economy by securing existing jobs at the operator's current facilities, in that their position in the current market is being strengthened, and it also creates new opportunities for employment and training at the new facility. As such the relevant guidance considers that this type of development is acceptable, subject to its environmental impacts.
- 5.3.5 Whilst the application site has not been identified and allocated for employment use within the Wrexham UDP, there are significant practical and economic reasons why the site is suitable for development to support the managed growth of the existing business. Indeed had the site been put forward for inclusion as an identified employment site it is likely that it would be subject to a site-specific policy, such as Wrexham UDP Policy E3, which allocates a much larger parcel of land for a single employment development and demonstrates that single sites are appropriate for large single use employers.

- 5.3.6 Therefore the site and proposed development is considered appropriate in respect of the wider context of Wrexham's overall employment land allocation.

5.4 Noise

- 5.4.1 A noise impact assessment has been prepared to support this planning application, the conclusions and recommendations from which are summarized as follows:

Onsite Vehicle Movement Noise

- 5.4.2 No mitigation measures such as barriers are required; however the following actions for control of noise on site and general good practice are recommended:

- HGV engines should not be left idling.
- HGV doors should not be slammed (particularly during the night-time).
- HGVs must be limited to 5mph on site. There must be clear signage on entering, leaving and on the site to remind drivers of this protocol.
- Unnecessary use of horns to be prohibited, particularly during the night-time (23:00hrs – 07:00hrs).
- Use of white noise Reversing Alarms is preferable to reduce tonality.
- For FLT's ideally they would use a light warning systems rather than reversing alarms. If necessary FLT alarms should also be white noise.
- Appropriate signage to HGV drivers regarding speed, use of horns, turn engine off etc.
- Similarly, a Manager should be onsite during all deliveries to maintain good practice from drivers and store staff to minimize noise levels.
- Use of banksmen to guide reversing HGVs.

- 5.4.3 A collapsible dock shelter should be used by HGVs to contain noise from poultry and internal processes.

Operational Noise Egress

- 5.4.4 Providing plant is compliant so that workers are not exposed to over the Lower Action Value (LAV) according to The control of Noise at Work Regulations, noise egress targets will be met. Further assessment (post planning) will be required once further details become available.

Traffic Noise

- 5.4.5 For NSRs on Pickhill Lane, the change in noise level due to road traffic will no longer be 'negligible' (based on measured 2011 levels). The change in traffic noise levels shall be categorised as 'moderate adverse' and a 'potentially significant increase'.
- 5.4.6 However, if the scheme is compared with the most recent previous application for the Cheese Cutting and Packaging Facility, there would be no change in associated noise level. Therefore comparably the noise levels to NSR 2 will not increase and will be considered "negligible" according to DMRB.

External Plant Noise

- 5.4.7 Noise from the external plant area should be designed to an overall sound power level of 79dB LWA. Alternatively the plant shall have a sound power level of 84dB LWA but be located in housing with a minimum sound reduction of 15dB.

Management Plan

- 5.4.8 In order to demonstrate the operator has identified all potential noise emission risks and has taken all appropriate measures to manage noise they will submit an noise management plan as a part of the development project. The expectation is that this Plan will be prepared and submitted for

approval, via the discharge of an appropriate planning condition, prior to the facility being operational.

Noise Monitoring

- 5.4.9 The operator will outline in their noise management plan the monitoring procedures they will implement at the site. The monitoring results will be regularly reviewed and used to evaluate the effectiveness of the site's noise control measures in order to continuously improve the efficiency of noise mitigation measures.
- 5.4.10 Regular noise monitoring will be undertaken at predetermined times and locations around the site boundary. In the event of a noise related complaint from neighbours additional monitoring will be undertaken. The monitoring will be carried out by trained, competent personnel.
- 5.4.11 Site staff will record time, date, noise type, location and intensity during their routine monitoring. If a complaint is received the circumstances, time and date will be recorded and the operator will undertake an investigation to determine the source of the noise and ascertain the appropriate mitigation.

Environmental Permit

- 5.4.12 It should be borne in mind that a separate application will have to be made to the Environment Agency for a permit to operate in accordance with the Pollution Prevention and Control Regulations. Previously licences were granted by local authorities. Submission of a formal noise management plan, setting out the principles of operations to be adopted and relevant BAT's (Best Available Techniques) to be applied for noise control, will be submitted as part of the application for a permit. This is likely to be in the form of an Integrated Pollution Prevention and Control (IPPC) (2008/1/EC) (IPPC) Assessment.

5.5 Air Quality

- 5.5.1 Council studies confirm that existing air quality is not considered to be of concern in the area of the site.
- 5.5.2 An air quality impact assessment has been prepared to support this planning application, the conclusions and recommendations from which are summarised as follows.

Development Traffic

- 5.5.3 A review has been undertaken of the traffic levels associated with the redevelopment based upon screening criteria contained within The Design Manual for Roads and Bridges (DMRB) and Environmental Protection UK (EPUK) Development Control: Planning for Air Quality (2010 update).
- 5.5.4 The transport statement demonstrates that whilst HDV movements per week are likely to increase over those of the previous site operations, these will be less than 40 movements per day and will not breach the DMRB or EPUK triggers for HDV movements. It also demonstrates that AADT flows will be less than those for the previously approved site operations. As a result, it is unlikely that there will be any increase in 'stop start' traffic congestion on local roads. No significant changes in average or daily traffic speeds are anticipated as a result of the change of use and no further car parking requirements are anticipated.
- 5.5.5 As a result the potential for any traffic air quality impacts as a result of the proposed change of use have been screened out.

Odour

- 5.5.6 The operator has undertaken an appropriate odour risk assessment and identified the following items as potential sources of odour associated with the development proposal:

- Delivery of live birds in modular frames via lorry; and
- Internal production line and associated waste treatment;

5.5.7 In order to demonstrate that the operator has identified all odour emission risks and has taken all appropriate measures to manage odour they will submit an odour management plan as a part of the development project. The expectation is that this Plan will be prepared and submitted for approval, via the discharge of an appropriate planning condition, prior to the facility being operational.

Odour Monitoring

5.5.8 The operator will outline in their odour management plan the monitoring procedures they will implement at the site. The monitoring results will be regularly reviewed and used to evaluate the effectiveness of the site's odour control measures in order to continuously improve the efficiency of odour mitigation measures.

5.5.9 Olfactory monitoring checks will be undertaken inside and outside the site boundary in order to identify odour concentrations in ambient air. This monitoring will be carried out regularly at predetermined times and locations around the site boundary and in the event of an odour related complaint. The olfactory monitoring will be carried out by trained and competent personnel.

5.5.10 Site staff will record time, date, odour type, location and intensity during their routine monitoring. If a complaint is received the circumstances, time and date will be recorded and the operator will undertake an investigation to determine the source of the odour and ascertain the appropriate mitigation.

Environmental Permit

5.5.11 It is submitted that, due to the proposed output tonnage of this site, an application will have to be made to the Environment Agency for a permit to operate in accordance with the Pollution

Prevention and Control Regulations. Previously licences were granted by local authorities. Submission of a formal odour management plan, setting out the principles of operations to be adopted and relevant BAT's (best available techniques) to be applied for effluent and odour control, will be submitted as part of the application for a permit.

5.6 Flood Risk

- 5.6.1 A Flood Consequence Assessment was commissioned, the conclusions and recommendations from which are summarised as follows.
- 5.6.2 The proposed development site is located within Flood Zone A according to the Development Advice Map. TAN15 requires that all planning applications for development proposals within Wales, justify that the consequences of all sources of flooding to and from the proposed site have been considered, that the development is considered safe for its design life.
- 5.6.3 The commercial/industrial nature of the development proposals means the site is classified as 'less vulnerable' within TAN15; this type of proposed development is considered 'acceptable' within Flood Zone A providing all surface water management requirements highlighted in TAN15; Section 8 are conformed to, with all possible sources of flood risk to and from the proposals being considered.
- 5.6.4 An Internet based search for flooding events did not recall any historical flooding in the immediate site area. Consultation with Natural Resources Wales furthermore indicated no historical flooding to the proposed development site. Consultation with Wrexham County Borough Council indicated minor historical flooding approximately 417m from site which was understood to be from surface water.
- 5.6.5 The proposed development site is considered to be at 'low' risk of fluvial and tidal flooding on the EA online mapping information, the proposed development is furthermore considered to be at predominantly 'low' risk from groundwater, surface water and flooding from artificial sources.

- 5.6.7 The development is considered to be accessible for emergency access and egress during the design storm events as the extents of the floodplain do not encroach into the site boundaries.
- 5.6.8 The Flood Consequence Assessment (FCA) has reviewed all sources of flood risk to both the proposed development and to the existing adjacent development as a result of the proposals, including; fluvial, tidal, pluvial, groundwater, sewers and flooding from artificial sources. In light of the relatively low flood risk from all of the sources reviewed the principle focus of the FCA is on the effective management of surface water drainage.
- 5.6.9 In compliance with TAN15 the post-development surface water management should mimic that of the pre-development situation and where possible offer some betterment, in order to minimise the flood risk to the neighbouring developments.
- 5.6.10 At present it is understood that the surface water run-off generated by the existing development discharges to the River Dee approximately 110m south-east of site via an existing outfall structure located parallel to the eastern boundary of site. This surface water outfall is understood to connect into 'Pickhill Old Hall Drain prior to discharging into the Main River.
- 5.6.11 Infiltration is potentially viable however soakaway testing (BRE365) will be required to confirm. If infiltration is not viable then the proposed surface water flows generated by the proposals will discharge as they do presently to the watercourse via the existing outfall structure in compliance with the guidance set out in TAN15. Detailed design will need to refine the proposed drainage strategy, consents may be required from NRW to discharge to the watercourse and agreement of discharge rates will be required; therefore early discussion is advised.
- 5.6.12 As the impermeable areas post-development are proposed to not vary with the existing situation, opportunities should be taken to provide soft landscaping where at all possible on site to assist in minimising surface water run-off; added benefits would include increase biodiversity and improved water quality.

- 5.6.13 There are no proposals to alter the existing foul water regime and there is no anticipated increase in foul water flows generated by the post-development proposals.
- 5.6.14 The Flood Consequence Assessment is considered to be commensurate with the development proposals and in summary, the development can be considered appropriate.

6.0 SUSTAINABLE DEVELOPMENT

- 6.0.1 The re-development of the former Maelor Creamery site is in accordance with sustainability principles at both national and local levels.
- 6.0.2 The existing site has been operational for over 60 years, through a variety of landowners and associated food / dairy products production and packaging. The creamery operation ceased circa 20 years ago, since which time the site has been principally been used for cheese-cutting and packaging and distribution. The use of the site for manufacturing purposes has clearly been established therefore for a considerable period of time.
- 6.0.3 The re-development of the site is supported by PPW which gives preference to the re-use of previously developed (or brownfield) land over Greenfield sites. It is also supported by Policy PS3 of the Wrexham UDP, which states that previously developed land should be given priority over the use of Greenfield land.
- 6.0.4 By utilising existing buildings and facilities to accommodate a modern, efficient poultry processing facility, the re-use supports the Assembly Government's objectives to use resources, including land, efficiently. It is also in accordance with objectives in PPW to support initiative and innovation and enhance the economic success of a business to maximise its competitiveness.
- 6.0.5 The environmental impacts arising from transport movements associated with the redevelopment at the former Maelor Creamery are limited. The site already generates traffic movements from existing operations and the proposed redevelopment will only generate a very small increase in the amount of vehicle trips.

7.0 CONCLUSION

7.1 In considering the planning merits of any development proposal, the starting point is the development plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act 2004. If it can be demonstrated that the proposal accords with the policies of the development plan, or that material considerations do not indicate that the application should be determined other than in accordance with the development plan, then planning permission should be granted.

7.2 On this basis, the key planning issues in the determination of this application are considered to be as follows:

- Conformity to the development plan;
- Impact upon the character and amenity of the area;
- Impact upon transportation and accessibility;
- Impact upon wider economy; and
- Opportunity for sustainable development.

7.3 This statement has shown how the scheme has been developed in response to the context of the area and in line with the relevant national and local planning policies. Accordingly, the development satisfies all relevant planning criteria.