

**SUPPORTING PLANNING STATEMENT
OUTLINE PLANNING APPLICATION FOR B2 / B8 DEVELOPMENT
ON LAND AT BRYN LANE, WREXHAM INDUSTRIAL ESTATE
ON BEHALF OF KINGMOOR PARK LIMITED**

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HOW Planning LLP, 40 Peter Street, Manchester, M2 5GP
Contact Partner: Gary Halman Telephone: 0161 835 1333

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1 INTRODUCTION

- 1.1 This supporting planning statement has been prepared by HOW Planning LLP on behalf of Kingmoor Park Properties (Wrexham) Ltd in support of an outline planning application for employment uses on land at Bryn Lane, Wrexham Industrial Estate.
- 1.2 This planning application seeks outline approval for B2/B8 development including means of access and siting on land at Bryn Road, Wrexham. All other matters are reserved for subsequent approval. The proposals are described in detail in section 3 of this statement and are fully illustrated on the submitted plans produced by Fletcher Architects.
- 1.3 This statement together with associated documents is intended to set out the case for development and to address relevant planning policy considerations. It considers the proposals in light of relevant planning policy and outlines the benefits of the proposals.
- 1.4 This statement is divided into eight sections (including this Introduction) as follows:
- **Site Location & Description** - A description of the site including location, characteristics, general surroundings and relevant planning history (**section 2**);
 - **Proposed Development and Intended Occupiers** – A description of the proposed development and intended occupiers (**section 3**);
 - **Economic Context: Wrexham's Labour Profile** – Assesses the need for new employment opportunities in Wrexham and the surrounding area (**section 4**);
 - **Review of the Relevant Planning Policy Framework** – This section sets out the relevant planning policy at all levels (**section 5**);
 - **Relationship of the Proposals with UDP Policy E3** – This section looks at the relationship of the proposals with policy E3 in detail (**section 6**);

- **Assessment of Alternative Sites** – Assesses the availability of potentially alternative sites which could accommodate the proposals (**section 7**);
- **Other Material Considerations** – This section provides an analysis of the key issues related to the consideration of the submission (**section 8**);
- **Conclusions** – This section summarises the overall conclusions which support the case for the proposed development on this site (**section 9**).

1.5 This application is supported by a suite of supporting documents and a number of plans. The scope and extent of supporting information has been prior agreed with Wrexham County Borough Council (WCBC) and has been subject to pre-application consultation with both the Council and key statutory bodies. The documents are scheduled in the table below.

Table 1: Supporting Application Documents

DOCUMENT	AUTHOR	DATE
Supporting Planning Statement	HOW Planning LLP	September 2008
Ecological and Landscape Management Framework	HOW Planning LLP	September 2008
Design & Access Statement	Fletcher Architects	September 2008
Phase 1 Habitat Survey	MRB Ecology	September 2008
Tree Survey	TEP	September 2008
Great Crested Newt Survey	Derek Whitcher Wildlife Consultants	September 2008
Breeding Bird Survey	Derek Whitcher Wildlife Consultants	September 2008
Bat Survey	Derek Whitcher Wildlife Consultants	September 2008

Butterfly Survey	Marches Ecology	September 2008
Lesser Silver Water Beatle Survey	Marches Ecology	September 2008
Landscape and Visual Appraisal	TEP	September 2008
Transport Assessment	Crowd Dynamics	September 2008
Noise Assessment	Haskoning	September 2008
Air Quality Report	Haskoning	September 2008
Drainage Statement	Shepherd Gilmour	September 2008
Geo-Environmental Desk Study	Shepherd Gilmour	September 2008

2 SITE LOCATION

- 2.1 This section sets out a description of the site including location, characteristics, general surroundings and relevant planning history.

Historical Overview

- 2.2 Wrexham Industrial Estate is the largest industrial estate in North Wales and is one of the largest estates of its type in Europe. It covers some 550 hectares and is home to over 300 businesses¹. The area was originally developed as a Royal Ordnance factory during the Second World War with much of the area occupied by buildings utilised in the production of explosives. The site was chosen based on its strategic location and the fact that the area had good rail connections and a good supply of local labour. Some of the original buildings still survive and have been converted for smaller business uses on the estate.
- 2.3 The application site has historically being used for farming and was recorded in 1881 as 'open fields' with a small road running from the north west to the south east through the site. The local area was made up of a collection of farm buildings and farm houses and the main land use was for agriculture. By the mid twentieth century the surrounding area had been developed for the production of explosives and large buildings are recorded to the west and south west of the application site. The site has remained in active use as agricultural land however during the early 1990s a section of the south west corner was laid out for a car park with hard standing.

Wider Context

- 2.4 Wrexham Industrial Estate is located approximately 6 km to the east of Wrexham Town Centre with good connections to the local and regional road network. The application site is located approximately 3 km to the south of the A534 which connects to the A41 linking with Chester, Whitchurch, Nantwich and onward to Crewe and the national motorway network (M6). Furthermore the site is located approximately 4 km north of the A525 which provides similar connections to the A534.

¹'Wrexham Industrial Estate Targeted Policing Initiative', Welsh Assembly Government, 2006

- 2.5 Wrexham Industrial Estate is not served directly by the railway network however the site is connected by bus to the main train station in Wrexham Town Centre. There are a number of buses which serve the area including the surrounding residential areas of Pentre Maelor and Cross Lanes. Bus services include the 1E service which provides a morning and evening connection to Wrexham Town Centre as well as the 41 and 42 services which provide an hourly bus service to the Industrial Estate from the town centre stopping at a number of locations on the way. There are also additional services which provide 'top up' capacity in the evenings to accommodate employees working within the estate (see Transport Assessment for further details).

Site Characteristics

- 2.6 The overall site is approximately 39 hectares in size and is predominantly made up of agricultural fields. It is located on the north eastern edge of Wrexham Industrial Estate and is bounded by Ridleywood Road to the north, Bryn Lane to the west, a large warehouse (occupied by TDG Plc) to the south and by open land to the east. The land is bisected by a belt of mature woodland running west to east broadly across the middle section of the site. It is further bisected by a track running from the north west corner to the south east. The south western portion of the site is occupied by a large area of hard standing which has been historically used for parking vehicles, in association with the industrial unit now occupied by TDG.
- 2.7 The site is made up of a number of gated agricultural fields defined by hedgerows and boundary trees. Full details of existing trees are provided in the tree survey submitted in conjunction with this application. There are also a number of ponds across the site with the majority of these located toward the south east. These have been identified and are assessed in the accompanying protected species surveys.
- 2.8 Directly to the west of the site (across Bryn Lane) is a major facility operated by Kellogg's which is highly prominent given its scale and form. Immediately to the north of the Kellogg's facility are a small number of residential properties on the corner of Bryn Road near the junction with Ridleywood Road. To the south of Kellogg's is a Council operated household recycling centre whilst adjacent to this, a large scale recycling facility to be operated by Waste Recycling Group (WRG) is

currently under construction. There are a number of properties located further to the south along Bryn Lane known as 'Little Bryn' and 'Bryn Cottages'. To the east and north east is mainly open land in agricultural use interspersed with farm buildings and a few residential properties. The minor settlement of Isycoed is located approximately 1 kilometre to the east and contains a primary school, playing field and hall.

3 PROPOSED DEVELOPMENT AND INTENDED OCCUPIERS

- 3.1 This application seeks outline approval for B2/B8 development including means of access and siting. All other matters are reserved for the detailed stage.
- 3.2 The proposals comprise two separate large scale warehouse units located on site 3A and 3B (as identified in site location plan reference PL01). These are referred to as unit 3A and 3B as illustrated on submitted drawing reference PL02 (proposed site plan). Full approval is sought for the siting of the proposed buildings in order that a suitable area for habitat mitigation can be secured.
- 3.3 It should also be noted that a separate planning application is being submitted concurrently for speculative B2/B8 development on a smaller parcel of land (within the ownership of the applicant) to the immediate south west of the application site. This is illustrated in the Design and Access Statement submitted with this application. The surveys and technical reports supporting this application have taken this site into account (referred to as Site 1).

Unit 3A

- 3.4 The applicant, Kingmoor Park Properties Ltd, has received an inquiry from a significant local employer which has expressed interest with regard to the potential relocation and expansion of their business to the Bryn Lane site. A detailed set of their requirements have been identified and it is evident that they can be accommodated here exceptionally well. It is therefore proposed that a 415,000 sq ft warehouse/distribution unit will occupy this section of the site. This facility will offer a bespoke 'design and build' opportunity to meet the specific requirements of the end user.
- 3.5 The proposals include new access arrangements from Bryn Lane for which full permission is sought (see Transport Assessment for further details). The proposed site plan fully illustrates the proposed access, servicing and car parking arrangements.

- 3.6 It should be noted that the proposals have been developed in response to not only the end user requirements but also having regard to the local and wider context including ecological considerations and access requirements. This is discussed in further detail below and in the Design and Access Statement submitted with this application.

TDG Plc Expansion (Unit 3B)

- 3.7 As noted in the site description TDG currently operate a large scale storage and distribution unit immediately adjacent the southern boundary of the application site in premises owned by the applicant company, Kingmoor Park Properties Ltd. A total of 180 personnel are employed here. TDG is one of Europe's leading supply chain management companies with operations across the UK and Ireland. TDG are seeking to expand their existing operations in Wrexham and have significant growth ambitions.
- 3.8 TDG have an immediate expansion requirement in order to fulfil their contractual obligations to a major UK high street retailer (which also has a significant internet and home delivery service). It is therefore proposed they will occupy an initial building of some 261,600 sq ft on the southern portion of the site, adjacent their existing operations. TDGs relationship with this client has been secured for the longer term and therefore a further 250,000 sq ft of expansion space will be required within 3/4 years thereby taking TDGs total requirement to over 500,000 sq ft.
- 3.9 Given the location of the existing operations it is essential that the new build takes place immediately to the north of the current building allowing a logical expansion of the site. It is vital that the new unit is located adjacent as this allows for interconnection thereby ensuring that the operations remain as efficient as possible. A new unit located elsewhere within Wrexham Industrial Estate (even if suitable land were to be available, which it is not) would not therefore be a viable option for TDG.

Proposed Access & Parking Arrangements

- 3.10 Full planning permission is sought for new access arrangements to serve both these developments. Access to plot 3A is proposed by way of a new access off Bryn Lane

as illustrated in the Transport Assessment and accompanying plans prepared by Crowd Dynamics.

- 3.11 With regards to the access for the TDG expansion site it is proposed to utilise the existing access onto Bryn Lane. The new TDG building will be linked to the company's existing operations through an open loop road system. This is vital in order to preserve the flow of operations as the business expands. A separate access will be provided from the existing access road to the front of the proposed unit for cars wishing to park at the facility.
- 3.12 As part of the new access proposals, new road markings and footways are proposed to improve the existing junctions with Bryn Lane. Section 3 of the transport assessment contains also details of proposed bus stops to service the new development. These proposals are fully illustrated in the plans accompanying the transport assessment, and have been agreed Wrexham County Borough Council following pre-application consultation.
- 3.13 In terms of the provision of car parking, a total of 250 car parking spaces (including 6 disabled spaces) are proposed for plot 3A whilst 92 spaces are proposed for TDG (including 4 disabled spaces). Both developments will include space for up to 20 cycles. Both users will require significant parking for goods vehicles therefore a total of 79 HGV parking spaces are allotted for plot 3A whilst 109 spaces are provided for the TDG expansion.
- 3.14 It should also be noted that the scheme will benefit significantly from the proposed Wrexham Industrial Estate Access Road (WIEAR). This will be a high standard dual carriageway road that will provide improved access from both the north and south of the industrial estate. The road now has planning permission and is due to open at the end of 2011.

Ecological Mitigation Area

- 3.15 The Phase 1 Habitat Survey submitted with this application assesses in detail the various habitat types found within the application site. As some habitat will

inevitably be lost as a consequence of development this will need to be mitigated within the residual land within the overall landholding.

- 3.16 In summary it is proposed to create over 21 hectares of improved habitat with appropriate new landscaping features, ponds suitable for Great Crested Newt populations, new grassland and tree planting. Full details are contained within the Ecological and Landscape Management Framework document submitted in conjunction with this application. The existing ecological context is fully documented in the Phase 1 Habitat Survey and Protected Species Surveys.
- 3.17 It should be noted that the mitigation proposals have been consulted upon, developed and agreed in principle with the Countryside Council for Wales (CCW). The future maintenance of the new habitat areas is likely to be secured by way of a partnership with a local Wildlife Trust. It is anticipated that this will be agreed at the detailed stage and prior to any development commencing.

4 THE ECONOMIC CONTEXT: WREXHAM'S LABOUR PROFILE

- 4.1 The proposals will bring about important benefits for the local and wider area including the creation of a significant number of valuable new jobs. In order to gain an understanding of the potential scale of these benefits, it is useful to assess the current state of the local labour market in Wrexham with the aid of NOMIS² statistics.
- 4.2 The following section draws on several key aspects of the labour pool in Wrexham County Borough and considers the relevance of this to the proposals.

Economic Activity

- 4.3 'Economically Active' people are those who are either in employment or unemployed. The definition does not take into account 'Economically Inactive' people, which refers to those who are neither in employment nor unemployed, such as the retired. The table below demonstrates Economic Activity levels of Wrexham Borough.

Table 2: Economic Activity (Wrexham County)

	Wrexham (Count)	Wrexham %	Wales %	Great Britain %
Economically Active	67,200	80.0	75.5	78.6
In Employment	64,100	76.1	71.1	74.4
Unemployed	3,300	4.9	5.6	5.2

Source: NOMIS (Jan-Dec 2007)

- 4.4 Unemployment is relatively low within Wrexham compared to the Welsh average (4.9% vs. 5.6%) largely as a result of intensive efforts to secure new employment opportunities after the rapid decline in traditional industries in the early 1980's. There is still a significant proportion of the resident population who are unemployed (3,300 persons) whom for new employment opportunities could offer a practical route back

² NOMIS, the National Online Manpower Information Service is an official Government resource for labour market statistics

into work. In addition, analysis of those classified as 'Economically Inactive' ³ reveals that 4.7% of those persons are recorded as 'Wanting a Job' which amounts to 3,800 persons, in effect this gives a total of 7,200 persons in the Borough who are currently not working but who have the potential to be employed.

Employment by Occupation

- 4.5 NOMIS statistics show that 24.6% of those in employment are involved in the 'Process plant & machine operatives' and 'Elementary occupations' category. This is significantly higher than the Welsh average (20.8%) and the Great Britain average (18.6%). The table below provides a breakdown of employees by job for Wrexham (this excludes those who are self employed).

Table 3: Employee Jobs (Wrexham County)

	Wrexham (Count)	Wrexham %	Wales %	Great Britain %
Manufacturing	11,900	22.8	13.4	10.9
Construction	2,300	4.4	5.3	4.8
Distribution, hotels & restaurants	11,100	21.4	23.4	23.5
Transport & communications	1,900	3.6	4.3	5.9
Finance, IT, other business activities	6,600	12.7	14.2	21.2
Public admin, education & health	14,900	28.6	32.2	26.9
Other Services	3,000	5.7	5.5	5.3
Tourism Related	3,600	7.0	8.9	8.3

Source: NOMIS (2006)

³ Those people classed as 'Economically Inactive' do not form part of the unemployment count but have the potential to move into the labour market at some point in the future.

- 4.6 The statistics demonstrate the importance of manufacturing to the local economy. It accounts for almost 23% of those employed in the Borough (11,900 persons), which is significantly higher than the average for Wales (13.4%) and over double that of the average for Great Britain (10.9%). It is also notable that the Borough has a smaller than average number of people employed in distribution, transport and communications.
- 4.7 In a time when the manufacturing sector is shrinking at a national and local level due to global and market forces (including foreign competition) and with clear room for expansion in the distribution and logistics market the value of the proposals should not be underestimated. This brief analysis of the labour market profile demonstrate that the proposals would be of significant benefit for the Borough, would assist in reducing unemployment and help bolster the declining manufacturing/goods processing sector, which is clearly in need of new investment.

5 REVIEW OF PLANNING POLICY FRAMEWORK

- 5.1 This section provides a summary of planning policy at all levels which is of relevance to the Councils consideration of the application.

National Planning Policy Context and Guidance

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

- 5.2 The Wales Spatial Plan was originally adopted by the National Assembly for Wales in November 2004 however this has been superseded by the 2008 update. The Spatial Plan seeks to ensure that new development is sustainable and sets out a shared vision for Wales. The Spatial plan identifies 6 sub-regions within Wales and sets out the key spatial objectives and development targets for each of these areas. The vision and key objectives are seen as important considerations in a regional context and should inform local development plans.
- 5.3 At a national level, the Wales Spatial plan identifies common themes that underpin the Assembly Government's objectives. These include:
- Building Sustainable Communities – This relates to the requirement to ensure that communities are attractive places to live and work and that sustainable communities can be built by tackling deprivation.
 - This involves regeneration as a driver for local development ensuring access to high quality housing and other public services.
 - Promoting a Sustainable Economy – This includes the requirement for an innovative high 'value added' economy for Wales which utilises and develops the skills and knowledge of the people. The key is to foster an economy which distributes wealth and adds to the overall quality of life. The document notes this can be achieved by the identification of new employment sites, the provision and maintenance of skills and training and through the provision of new infrastructure.
 - Valuing Our Environment – This theme recognises the quality of the natural environment and the need to promote the protection of natural and historic assets whilst tackling the issues associated with climate change.

- Achieving Sustainable Accessibility – The key issue is concerned with developing access in a sustainable fashion to encourage economic activity and widen employment opportunities whilst integrating the social, environmental and economic benefits of travel.
- Respecting Distinctiveness – This issue is related to the need to sustain and celebrate the Welsh language and Welsh culture. This includes the need to conserve and celebrate the built and natural environment and ensuring that key settlements have a high quality environment which nurtures a sense of identity and community.

5.4 In light of these identified key issues the plan goes on to consider their relevance for each of the 6 sub-regions in terms of their future development prospects.

5.5 The vision for North East Wales (within which Wrexham lies) is to harness the economic drivers on both sides of the English/Welsh border whilst reducing inequalities that may exist. It is recognised that North East Wales makes a very important contribution to both the Welsh and UK economy and that the future prosperity of the area is closely linked with that of North West England, in particular West Cheshire.

5.6 The plan suggests that the area needs to improve the quality and diversity of the economy focusing on high value manufacturing and services, ensuring access to good job opportunities to meet the needs of local employers and to promote sustainable development.

5.7 Furthermore in promoting a sustainable economy the plan recognises that maintaining the competitiveness of the manufacturing sector is of fundamental importance to the long-term prosperity of North East Wales and the wider North Wales region. It states that the economy of the region needs to continue to build upon its significant strengths by improving the quality and diversity of the existing sectors whilst making the most of its environmental and geographic advantages. The spatial plan specifically recognises that it is important to maintain the quality of the offer of key employment sites including Wrexham Industrial Estate. Importantly the plan recognises that across North East Wales there are sufficient or even surplus

levels of employment land allocated in land use plans; however the specific type and quality of the sites is often not suited to market demand.

- 5.8 With regards to skills, education and market issues the plan notes that the region is aiming to grow its economy by helping more people into work who are currently inactive and by providing better, higher paid and more secure job opportunities for those already in the workforce.
- 5.9 It is considered that the new employment opportunities proposed in this application will help to meet the spatial plan's local and wider objectives of North East Wales and specifically those of Wrexham the area in terms of improving the local economy; providing new jobs and helping to build sustainable communities whilst at the same time enhancing and protecting the environment.

Planning Policy Wales (March 2002)

- 5.10 Planning Policy Wales (PPW) sets out the Welsh Assembly Government's sustainable land use policy. This provides the context within which Unitary Development Plans are prepared and development control decisions on individual planning applications and appeals are taken. PPW is supplemented by a series of Technical Advice Notes (TANS); together with Welsh Office Circulars this comprises the range of national planning policy.
- 5.11 PPW is underpinned by the principles of sustainable development. This means that sustainability is placed at the heart of the decision making process. This is reflected in the pursuit of four key objectives:
- Social progress which recognises the needs of everyone;
 - Effective protection of the environment;
 - Prudent use of natural resources; and
 - The maintenance of high and stable levels of economic growth and employment.
- 5.12 A number of broad objectives derive from these principles and aim to guide future development. PPW states that planning policies and proposals should:
- Promote resource efficient settlement patterns;

- Locate development so as to minimise the demand for travel;
- Contribute to the protection and improvement of the environment;
- Minimise the use of non-renewable resources;
- Promote access to employment, shopping, education, health community leisure and sports facilities;
- Promote quality, lasting, environmentally sound and flexible employment opportunities;
- Support initiative and innovation and avoid placing unnecessary burdens on enterprise so as to enhance the economic success of both urban and rural areas, helping businesses to maximise their competitiveness; and
- Respect and encourage diversity in the local economy.

5.13 Proposals for the application site will underpin these objectives through the provision of valuable new employment opportunities by expanding and diversifying the local economy and will help to consolidate and improve the role of Wrexham Industrial Estate. The proposals will protect and enhance the local environment whilst maximising the efficiencies and sustainability of the new development.

5.14 Chapter 5 of PPW sets out the Government's position on the 'Conservation of Natural Heritage and the Coast'. It notes that attractive and ecologically rich environments are important and biodiversity and landscape are important considerations in the economic life of many communities. It recognises that the quality of the environment is often an important consideration when businesses are considering locations for investment. A number of objectives are set out for the conservation and improvement of Natural Heritage which include the need to:

- Promote the conservation of landscape and biodiversity, in particular the conservation of native wildlife and habitats;
- Ensure that action in Wales contributes to meeting international responsibilities and obligations for the natural environment;
- Ensure that statutorily designated sites are properly protected and managed; and,
- To safeguard protected species.

- 5.15 Paragraph 5.1.3 of PPW notes that a key role of the planning system is to ensure that land requirements are met in ways that do not impose unnecessary constraints on development whilst also ensuring that all reasonable steps are taken to safeguard or enhance the environment. In fact it is recognised that conservation and development can often be fully integrated.
- 5.16 In terms of development control decision making, PPW states that biodiversity and landscape considerations must be taken into account in determining individual applications. It notes that the effect of development proposals on the wildlife or landscape of any area can be a material planning consideration. It states that in such instances it is important to balance conservation objectives with the wider economic needs of local businesses and communities whilst ensuring development is sustainable. In this regard, pre-application discussions with the Local Authority and statutory bodies such as CCW are advised. The applicant, through its professional advisers has followed this advice and engaged with key stakeholders in formulating these proposals.
- 5.17 Paragraph 5.5.4 states that where planning applications are likely to result in disturbance or harm to protected species Local Planning Authorities should seek the advice of CCW. With regards to protected species it is stated that applications must conform to any statutory species protection regulations affecting the site concerned. This application includes a comprehensive set of supporting information concerning ecological matters. Extensive pre-application discussions have taken place with the Countryside Council for Wales concerning the proposed habitat mitigation measures as is set out in the Habitat and Landscape Management Framework submitted with this application.
- 5.18 Chapter 7 of PPW is entitled 'Supporting the Economy'. The objectives include the requirement to enhance the economic success of both urban and rural areas, supporting initiative and avoiding placing unnecessary burdens on enterprise. Economic development should be in line with sustainability principles, respect the environment and be appropriate in terms of scale and design.
- 5.19 The guidance sets out a number of criteria which Local Authorities should have regard to when determining planning applications for industrial and commercial uses.

These include the need to assess the impact of development on the environment whilst having regard to how environmental losses can be mitigated or compensated for. LPAs should also have regard to accessibility of the proposed development and the compatibility with industrial and commercial activities.

- 5.20 Chapter 8 of PPW 'Transport' promotes alternative means of transport and seeks to encourage travel generating uses in sustainable locations which are accessible. Paragraph 8.7 of PPW sets out a series of criteria to be considered in assessing planning applications for development that has transport implications. This includes the production of a Transport Assessment with associated Travel Plan ensuring that relevant factors are assessed such as the level and nature of public transport provision, the impacts of the proposed development on travel demand and the effects on the safety and convenience of other users of the transport network. All of these matters have been considered in detail in the submitted Transport Assessment produced by Crowd Dynamics, which has been worked up in discussion with the County's Engineers department.
- 5.21 Chapter 12 'Infrastructure and Services' covers a number of areas including services such as education and health facilities along with water supply, sewers, waste management, energy supply for renewable sources and telecommunications. Issues concerning sustainable energy are considered in the Design and Access Statement which provides detail on measures to increase efficiencies and reduce resource requirements; it also considers issues of waste management and sustainability.
- 5.22 Chapter 13 sets out guidance in relation to minimising and managing environmental risks and pollution including Flood Risk and Climate Change. A series of supporting technical reports have been produced to provide information on a number of issues including a Flood Risk and Drainage Statement, Desk Top Ground Investigation Study, Air Quality Report and Noise Assessment.

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

- 5.23 The statement provides an update to section 2.9 (design) of Planning Policy for Wales. The statement provides guidance on Design and Access Statements and

advocates an integrated and inclusive approach to sustainable design, proportionate to this scale and type of development proposed. A Design and Access Statement accompanies this application.

Technical Advice Notes (TANs)

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

TAN 5 – Nature Conservation and Planning

- 5.25 TAN 5 sets out further guidance in relation to nature conservation and planning. It summarises the position as set out in Planning Policy for Wales in relation to protected species. Reference is made to the habitat regulations and the implications of such for new development.

TAN 8 – Planning for Renewable Energy

- 5.26 This guidance note sets out the Assembly Government's position on energy policy including targets for energy production and efficiency. It notes that energy conservation is heavily influenced by design issues and refers to TAN 12 in this regard. This guidance states that design, infrastructure and site layout are key to achieving energy efficient development for example by taking advantage of passive solar gain in domestic and non-domestic buildings.
- 5.27 It notes that the standards established under the BREEAM scheme for non-residential development form a useful framework for energy efficiency consideration. The Design and Access Statement submitted in conjunction with this application contains further details on proposed energy reduction techniques and sustainability techniques to achieve a BREEAM rating of 'Very Good'.
- 5.28 There are a number of other technical advice notes which are considered to be relevant however in the interests of brevity their contents are not repeated here. They have however been addressed in the various technical documents submitted in

conjunction with this application or are referenced in section 7 of this statement. They include:

- TAN 11 – Noise (October 1997);
- TAN 12 – Design (2002);
- TAN 15 – Development and Flood Risk (July 2004); and
- TAN 18 – Transport (March 2007).

Local Planning Policy Context

Wrexham Unitary Development Plan (February 2005)

- 5.29 The Wrexham UDP covers the administrative area of Wrexham County Borough Council. It supersedes previous adopted development plans, namely the Wrexham Maelor Plan, the Glyndwr Local Plan and the Clwyd Structure Plan.
- 5.30 The application site is identified on the Wrexham UDP Proposals Map under Policy E3 'Large Single User Employment Site'. The contents of this policy are reviewed later in this section. The following is a summary of other policies contained within the adopted UDP which are considered to be relevant to the evaluation of the planning application.
- 5.31 Policy PS1 – Is one of several Part one strategic policies. This policy states that new development for housing and community services will be directed to within settlement limits/employment areas.
- 5.32 Policy PS2 – States that development must not materially detrimentally effect countryside, landscape/townscape character, open space, or the quality of the natural environment.
- 5.33 Policy PS3 – States that development should use previously developed brownfield land in preference to the use of greenfield land particularly where greenfield land is of ecological, landscape or amenity value or comprises agricultural land of grades 1, 2 or 3A.

- 5.34 Policy PS4 – Development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car.
- 5.35 Policy PS11 - The Council will encourage proposals which improve the biodiversity value of sites and the establishment of local nature reserves where the nature conservation and landscape interest of the land will be protected and enhanced.
- 5.36 The UDP sets out a number of Development Objectives, as outlined in policy GDP1 which states that all new development should:
- Ensure that built development in its scale, design and layout, and in its use of materials and landscaping accords with the character of the site and makes a positive contribution to the appearance of the locality;
 - Take account of personal and community safety and security in the design and layout of development and public/private spaces;
 - Make the best use of design techniques, siting and orientation in order to conserve energy and water resources;
 - Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality;
 - Ensure that built development is located where it has convenient access to public transport facilities, and is well related to the pedestrian and cycle routes wherever possible;
 - Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industrial and quarrying, and associated noise, odour or vibration arising from development;
 - Secure public services (e.g. gas, water, electricity) to development at the minimum costs;
 - Safeguard sites and areas of nature conservation and wildlife interest, and provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest;
 - Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site;

- 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; and
- Secure the development of sustainable communities, through the promotion of the economic, social and environmental wellbeing of the area.

5.37 Policy EC6 'Biodiversity Conservation' states that development either within or close to sites of biodiversity interest will only be permitted where it can be clearly demonstrated that the need for the development outweighs the need to safeguard the intrinsic nature conservation value of the site. Furthermore, it states that where such development is permitted, losses should be kept to a minimum, and compensatory measures should be provided. In addition, measures to improve biodiversity value of sites and to enhance their natural conservation interests and landscape quality including the establishment of local nature reserves will be supported.

5.38 Policy EC12 – This policy relates to development and flood risk and states that:

'Development (including the raising of land) within defined flood plains will only be permitted if it:-

- *Would not be subject to an unacceptable risk of flooding on site; and/or,*
- *Does not result in the unacceptable risk of flooding on or off site; and/or,*
- *Does not adversely affect flood management or maintenance schemes.'*

5.39 Policy EC13 – This policy states that development which would result in unacceptable adverse impact on the water environment due to additional surface run-off will not be permitted.

5.40 Policy E3 – 'Large Single User Employment Site'. This policy relates directly to the application site and 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 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.'

- 5.41 The justification of policy E3 notes that the employment allocation complies fully with the UDP's strategic and environmental policies and that its advance identification should significantly reduce potential development lead in time, thereby making it attractive to a potential occupier. In addition it states that any additional proposals that cannot be developed on current allocated or committed employment land must comply with the plans strategic and general development principles as well as environmental policies. Proposals which are forthcoming for the land allocated under policy E3 should contain landscaping details which are sympathetic to the local landscape whilst opportunities should be sought to create new habitats for wildlife reflecting policies EC5 and EC6 of the UDP.
- 5.42 Policy T6 – 'Primary and Core Highway Network' states that the design of road improvement schemes, the implications of traffic management proposals and the control of development adjacent to the primary and core highway network will have regard to the need to ensure the free and safe flow of traffic.
- 5.43 Policy T8 relates to parking provision in new development and states that development granted planning permission will be required to provide vehicle parking spaces either on site or nearby, in accordance with the Councils current parking standards. In determining required levels of car parking the following factors will be taken into account:
- The availability of public transport nearby;
 - Proximity to public car parking;
 - Proximity to local services and facilities;
 - Road safety hazards and amenity considerations arising from on-street parking in the vicinity of the site.

Supplementary Planning Guidance

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

- LPG Note 6 – Access to and the use of buildings (September 2004);
- LPG Note 7 – Landscape and development (November 2003);
- LPG Note 16 – Parking Standards (April 2005);
- LPG Note 17 – Trees and Development (April 2006);
- LPG Note 22 – Sustainable Building (July 2004);
- LPG Note 26 – Landscape and Industrial Development (November 2003).

Emerging Policy: Wrexham Local Development Plan

5.45 The Wrexham Local Development Plan is currently at the 'Draft Preferred Strategy' stage. This document was published in October 2007 with the statutory consultation period running from October to November 2007. Work is currently underway on the evidence base which will be required to support the preferred strategy going forward, and the Council intend to publish a draft plan in January 2009 to be placed 'on deposit'. It is then intended to submit the plan to the Welsh Assembly Government in September 2009.

5.46 The draft preferred strategy sets out a number of 'key change drivers' which is essentially a summary of key issues affecting the County Borough. It notes that the manufacturing sector is very important to the local area and will continue to be a significant source of employment during the plan period. It is also noted that the County has an over supply of employment land however it is likely that this is due to the employment land stock not been of a high enough quality or being constrained by its location meaning that it is not attractive to the market or potential users. Despite this however it notes that there are a number of strategic employment sites which will be critical to the achievement of the preferred strategy including Wrexham Industrial Estate which will benefit from planned road improvement links.

- 5.47 Other key issues which are highlighted include the requirement to improve public transport, for quality of design to be enhanced more generally and to ensure continued environmental protection.
- 5.48 The draft preferred strategy sets out a vision and a number of objectives to drive the future development of the area. These objectives include the need to:
- Consolidate recent growth and regeneration;
 - Ensure that new development is accessible and sustainable;
 - Improve and develop better transport systems within the County Borough and regionally by sustainable modes of transport;
 - Strengthen Wrexham's regional employment, shopping, education and health role;
 - Strengthen the County Borough's regional economic role; and
 - Protect and enhance quality historic built and natural environments through investment and design.
- 5.49 The preferred strategy sets out the key drivers which will make up a prosperous economy; these include:
- The promotion and development of Wrexham as a main regional centre to complement Chester, building on existing assets including education, health and retail.
 - Improving public transport to link areas in need of regeneration with areas of economic opportunity;
 - Supporting the regeneration of Wrexham as a regional capital for North East Wales;
 - Diversifying the economy by providing locations attractive to high quality employment (including service employment) and supporting tourism and rural economic development;
 - Continuing the role of the County Borough as a key driver within the sub-regional economy, an economy that is enjoying high growth rates with great potential to continue this growth in a sustainable manner; and,
 - Promoting district shopping centres.

- 5.50 The proposals will assist in contributing toward the vision set out in the preferred strategy by enhancing and strengthening Wrexham's employment role in the borough and sub region. The potential for significant job creation will aid regeneration efforts more generally and along with the new link road proposed will help to improve and promote Wrexham Industrial Estate as the key regional location for investment.
- 5.51 Policy E3 is of significance in terms of assessing the acceptability of the proposals in planning terms. As such, the policy and its relationship with the proposed scheme is explored in detail in the following section.

6 RELATIONSHIP OF THE PROPOSALS WITH UDP POLICY E3

- 6.1 This section of the supporting statement assesses the relationship of the proposals with UDP Policy E3, 'Large Single User Employment Site'. It also considers the policy in terms of its relationship with the site in physical terms. 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 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.'

- 6.2 Policy E3 essentially sets out two criteria in relation to proposed development of this site. The first is that the user should require a site of over 30 hectares and the second is that the proposal cannot be accommodated on allocated employment land or land with planning permission.
- 6.3 The second of the two tests in effect requires consideration of the extent to which there are other suitable, available and viable alternative sites which could accommodate the proposals. In order to address this limb of the policy it has been necessary to assess all potential alternative sites. Section 7 of this statement contains this assessment and concludes that there are no other alternative sites in the Borough which could accommodate the proposed development either as a whole or when considering the two large scale buildings individually. This criterion is therefore met.
- 6.4 In relation to the requirement for a single user of more than 30 hectares, this policy reference logically must represent the gross site area of a development proposal. Within the gross area would need to be included sufficient land to mitigate ecological impacts and address other environmental constraints, which are both particularly important considerations in relation to this site. The *net* developable area would therefore be considerably less than the 30 ha figure referred to in the policy.

- 6.5 The application proposal seeks approval to a total development footprint of approximately 15.44 ha within a gross site of some 39 ha and is designed to deliver some 860,000 sq m of built floorspace⁴. This clearly amounts to a significant scale of development occupying a large site, consistent with the strategic intent behind the policy. In relation to the specific characteristics of this site, it is evident that it would not be possible or appropriate to develop this overall scale of floorspace in a single building or even in a complex of buildings other than in the two broad locations identified in the application masterplan.
- 6.6 This is because of the ecological issues and the central belt of protected woodland (through which a watercourse runs) which is an important feature requiring protection (and ideally enhancement). Work carried out by the applicant's professional team in conjunction with CCW and the Councils Landscape/ecology officers has led to the identification of areas within the site which are agreed to represent the optimum locations to accept major development. Development of the scale proposed can demonstrably be accommodated on the site in this way, with adequate areas of land available for mitigation and with acceptable landscape impacts; in fact some 60% of the gross site is to be kept open and devoted to landscape treatment and/or be protected in the long term as ecological mitigation areas.
- 6.7 As is evident from the submitted masterplan, the site logically falls into two distinct development zones divided by the central belt of woodland. These development zones and the large scale buildings that can be sited within them lend themselves to occupation by two users and not a single occupier. They are physically distinct, separately accessed and ideally suited to separate occupiers.
- 6.8 It is clearly important to make optimum use of this site, and indeed all the well located, good quality, immediately available employment land within Wrexham, which is considered by independent consultants to be in relatively short supply.⁵ It would not be the best interests of the proper planning of the area or the economic wellbeing of the County Borough for land which is evidently suitable and appropriate

⁴ Defined as the developed footprint of the buildings together with associated roads, hardstandings and parking areas

⁵ Wrexham Employment Sites Study for Wrexham CBC, GVA Grimley August 2007.

for employment development to be sterilised unnecessarily. Thus we consider that full use should be made of both the identified development zones within the site. It would not, in our view, be appropriate to permit development of only one of these development areas based on a strict application of the single user policy.

- 6.9 Demand from two major users had been identified which will enable large scale employment buildings to be developed in this form across the site. Conversely there has been no demand from a large single user since this site was identified for this purpose in the UDP in 1996. Thus for over 12 years the Councils aspirations for the site have not been realised, and there is no evidence that a single user which requires more than 30ha will be attracted to the site in the foreseeable future. The Councils independent advisers (GVA Grimley) recognise that land supply on the Wrexham Industrial Estate includes too many large parcels and specifically there is potential to reconfigure key plots in a way which will make them more attractive to the market, principally through subdivision. The Fibreglass site (the application site) is singled out specifically in this regard. ⁶ It continues that “this need (i.e. for subdivision) is evidenced through lack of interest currently shown in the site together with extensive market consultation which highlights the changing land requirements of an evolving employment market.” Thus the market experience over an extended period and the views of independent consultants both point to a need for a more flexible and pragmatic approach to the future form of development of the site, in order to maximise its contribution to the local economy and realise its evident market potential. Given the lack of any realistic prospect of a large single user, this potential can be realised without any harm to the underlying objects of the policy. Indeed in its current form, and based on evidence to date, the policy will not be capable of realisation within the plan period.

- 6.10 The intended occupiers of the development both have specific requirements which are capable of being met, TDGs being highly site specific. Both proposals constitute major new employment development which the County Borough has an excellent opportunity of capturing, thereby protecting existing jobs and enabling the creation of new ones through consolidation and expansion. The alternative is to lose the opportunity of attracting/retaining this investment and jobs and there is the possibility of losing major employers to another area, most likely outside Wales.

⁶ GVA report para 6.49

- 6.11 In summary, the UDP policy seeks to protect this site for a major single user of 30ha or more which cannot be accommodated on the Councils general employment land resource elsewhere. Given the approximate 10 ha site requirements of each of the major occupiers which this application seeks to meet, our analysis of the employment sites has concluded that no other sites are currently available. This limb of the policy is thereby met.
- 6.12 The site has been available for many years and has not attracted any demand for a large single user such as the policy aspires to. All the evidence, including the views of the Council independent consultants, points to the site no longer being required for this purpose, and the unlikelihood of it ever being developed in this manner. An alternative strategy is available which would enable the site to come forward for employment use, and to address the specific requirements of two major occupiers, which already have strong local connections and are major employers in the Borough. The site lends itself to two very large scale employment units and this is the best way of making optimum use of the allocated land, which is evidently suitable for this form of development with acceptable environmental consequences.

7 ASSESSMENT OF ALTERNATIVE SITES

Requirements

- 7.1 As set out in section 3 above the proposals consist of two separate warehouse units. It is intended that a significant local employer will be the occupier of a new 400,000 sq. ft warehouse development on the northern section of the site. The plans have been developed specifically to address the requirements of this user including a significant distribution element. Taking these requirements into account, developing the required floorspace and associated yardage/vehicle circulation space and staff parking generates a minimum site requirement of around 10 hectares. To meet the proper requirement for building configuration also demands a regular shaped site.
- 7.2 TDG have an existing operation to the immediate south of the application site and due to a long term commitment to a national retailer, have an immediate need to expand their operations. In total, they require 500,000 sq ft of operating space in addition to adequate ancillary parking and servicing areas. This warehouse unit is an expansion to the existing TDG operations to which it must have physical and functional linkages. This therefore rules out the potential of TDG accepting a location elsewhere, as logically an expansion of the existing facilities must take place on or adjacent to the current site.
- 7.3 Both users will require good connectivity to the road network and due to the scale of their requirements they require a relatively flat site in an acceptable form in order to accommodate very large footprint buildings and servicing requirements. The application site fully satisfies these requirements whilst expanding onto the land adjacent to their existing operations is ideal for TDG.
- 7.4 In light of the tests set out in policy E3 it is considered important to assess the availability of other potential sites. It is therefore important to demonstrate that the application site is the **only** site in Wrexham County Borough which is suitable, available and viable for the proposed development.

General Availability of Suitable Employment Sites

7.5 In assessing whether there any other alternative sites it is useful to assess the availability and quality of employment land more generally across the Borough. Wrexham County Borough Council commissioned GVA Grimley in October 2006 to undertake an employment sites study; this document was published in August 2007. The study made several key findings which are of relevance:

- The majority of available employment land is within Wrexham Industrial Estate;
- The current offer is limited in terms of the availability of sites for distribution and large warehousing uses;
- Sites which are available are small in scale, the average available site is 4.06 hectares;
- The majority of sites identified as being vacant are well under 4 hectares; and
- Much of the employment land offer is heavily constrained.

7.6 The GVA report found a general oversupply of poor quality highly constrained employment sites which are unlikely to come forward for development without public sector assistance. Of the sites available for general industrial/warehouse uses, the offer is dominated by sites on Wrexham Industrial Estate. In order to realign with the requirements of the market and current demand, a significant number of sites are recommended for de-allocation from employment use for more suitable uses.

Alternative Sites

7.7 The GVA report assessed all allocated employment sites in addition to a number of other sites suggested by the Council. Leaving aside the suitability, availability or viability of these only 5 meet the minimum requirement of 10 hectares, these are listed below:

- Cefn Park, Wrexham Industrial Estate – 10.6 hectares;
- Western Gateway, Wrexham Technology Park Phase III - 11.56 hectares;
- Bryn Road, Wrexham Industrial Estate – 14.5 hectares;
- Ruabon Business Park – 24.6 hectares;
- Former Firestone Site, Wrexham Industrial Estate – 44.9 hectares

Cefn Park, Wrexham Industrial Estate

- 7.8 This site is not allocated in the UDP neither does it have planning permission for development. This site therefore fails to meet either of the 2 tests set out in policy E3 and should therefore be discounted on this basis alone. However, since the site has been assessed in the GVA employment sites report and is listed as being over 10ha it is given consideration here.
- 7.9 The site has been ranked by GVA with a 'high' constraint score of 21 which puts it alongside the most constrained sites in the survey; this means that the site poses 'serious issues' which impact upon its development potential. The site is irregular in shape and has potential access issues; it is very unlikely that it could accommodate the proposed warehouse development due to its form. On the basis of its constraints score the employment sites report recommends that the Council consider de-allocating the site as it 'sits amongst the poorest quality sites in all aspects'. It is therefore evident that the site is not a suitable development option and cannot be considered as a viable alternative site.

Western Gateway, Wrexham Technology Park Phase III

- 7.10 This site is identified in the GVA report as 'the premium site within Wrexham'. A development brief was published in March 2004 by the Council setting out the site context and identifying suitable uses. A number of development 'zones' were identified with 'Zone A, Ruthin Road' identified for employment uses. The brief states:

'The aim is to achieve a high quality employment site in a location which will attract substantial private commercial investment. The development will form the final phase of Wrexham Technology Park and in accordance with the Council's Economic Development Strategy; uses will therefore be limited to B1...'

- 7.11 The site is therefore not considered to be available for other uses due to this restriction. The Council's aspiration is that the site will be developed for high quality B1 uses targeting the innovation and new technology sectors. Its development would be one phase of the wider regeneration of the Western Gateway including a mix of

commercial and residential development. It is highly unlikely that the proposals would sit comfortably with the aspirations for this zone of the Western Gateway or the wider area. Given that the site has been identified solely for high quality B1 development it is considered that it is not a suitable location neither is it available.

Bryn Road, Wrexham Industrial Estate

- 7.12 This site is allocated for employment use in the UDP. The Council's Employment Land Availability Report (April 2008) identifies the total site area at 9.5 ha. The site has been partially developed for a Household Recycling Centre operated by the Council (2.66ha) whilst construction is currently underway for large scale recycling plant to be operated by the Waste Recycling Group (WRG). This facility will occupy 3.25 hectares of the site and will sort recycled materials collected from residential properties across the borough. There is therefore only 3ha remaining for development.
- 7.13 Given the minimum requirement of 10ha which would be needed to allow development to take place this site is clearly not of a suitable scale. It is therefore not considered to be suitable as it could not feasibly accommodate the proposed development.

Ruabon Business Park

- 7.14 This site has historically been earmarked for business park type development and has had the benefit of planning permission. An outline planning application has recently been submitted to the Council for the whole site (reference P/2008/0844) for a mixed use scheme comprising A1 food retail and B1 office development. The scheme seeks outline approval for a 33,000 sq ft foodstore and for approximately 500,000 sq ft of office development. The proposals would be built out in phases, with the retail element acting as the financial driver for the business uses to follow. The Council's Economic Development department have stated that they support the B1 element of these proposals. Given that this site is being actively promoted for A1/B1 development it is not considered to be available for other uses and cannot therefore be considered as an alternative location.

Former Firestone Site – Wrexham Industrial Estate

- 7.15 In assessing the constraints of this site, the GVA report states that the site 'may no longer be available'. It is also noted that the site may be partly protected due to ecological considerations. In terms of taking the site forward for development, it is considered that to make it more attractive to the market that the site should be broken down into smaller 'Design and Build' plots in addition to some medium scale office development.
- 7.16 The site is currently within the ownership of the Welsh Assembly Government. It is understood that proposals are being devised to take the site forward for a number of new users in line with the recommendations set out in the GVA report. It is evident that the site is not currently available and cannot therefore be considered as a genuine alternative to meet the needs of the intended occupiers.

Conclusions

- 7.17 The GVA Grimley report recognises that there is a serious issue in Wrexham given the lack of suitable sites for distribution and large warehouse uses. This section of the report has demonstrated that there are currently no other sites which can be considered as suitable, available and viable alternatives to the proposed development site that could accommodate either of the two proposed units. This limb of policy E3 is therefore clearly met.
- 7.18 In order to rectify the lack of suitable sites in the borough, and in light of the need to restructure the employment land offer, the employment sites study recommends that a "supply side" approach is adopted which essentially means responding to the needs of the market. It notes that despite some qualitative issues that Wrexham Industrial Estate continues to be a popular location for manufacturing and associated uses and remains competitive in terms of its investment yield.
- 7.19 With regards to the application site, the GVA report recognises that the single user policy is a constraint to development and subdivision/reconfiguration is required in order to make the site more attractive. As discussed in section 7 of this report, the application for two large scale users is in line with current market demand and

highlights the fact that the single user policy is a constraint to investment and development. The impact of this constraint is accentuated by the fact that there are no other alternative sites which can be considered for the proposed development.

8 OTHER MATERIAL CONSIDERATIONS

- 8.1 This section considers the attributes of the site and the conformity of the application proposals with relevant planning policy.

Location

- 8.2 Wrexham Industrial Estate is a long established and successful employment location. It is home to a wide variety of manufacturing companies and associated uses. The site has good connections to the road network including the A534 and A525 and is therefore an ideal location for the proposed development. The dominant land use in the vicinity of the application site is industrial/commercial and the proposals will be in line with this.
- 8.3 Wrexham Industrial Estate has been identified as a key employment location in the sub region. Its role will be enhanced further through development of the proposed new link road which will connect the estate directly to the A525 improving accessibility to the strategic route network within the region.

A Comprehensive Approach to Development

- 8.4 The scheme represents a comprehensive approach to the development of the entire employment allocation. It is a highly significant employment opportunity for the Borough and will bring about benefits of regional significance. The proposals are supported by a number of technical reports and plans, the scope and extent of which have been prior agreed with the Council and other relevant statutory bodies.
- 8.5 As discussed in section 6 the proposed development has been strongly influenced by the site context and other requirements. The scheme layout represents the optimum design solution and is reflective of the requirements of the end users. The scheme is technically robust and provides a valuable opportunity to take the site forward for employment development, for which there is a need. It will also secure ecological benefits, including the ongoing management of a large area which will ensure the protection and enhancement of important species.

A Sustainable Development

- 8.6 The proposals are in line with national planning policy objectives in that they help to deliver the Assembly Government's shared vision for Wales as set out in the Wales Spatial Plan (2008). This is underpinned by the requirement for sustainable development. As a result of the significant number of jobs which will be secured and the scale of the potential employment to be generated, the development can be seen to be contributing directly toward promoting a sustainable economy. This is wholly in line with the vision for North East Wales as set out in section 5 of this statement, which seeks to reduce inequalities in the region.
- 8.7 In addition the proposals will also help to contribute toward the objective of building sustainable communities through employment provision and this will in turn aid wider regeneration objectives for the Borough.
- 8.8 The economic benefits of the scheme are explored later in this section however it is worth noting that the consolidation of TDGs operations and the other major local employer is likely to increase the sustainability of both businesses. Securing and consolidating TDGs operations clearly removes the risk of their potential relocation, potentially outside of the Borough which would not be a sustainable outcome. There is the potential to reduce out migration caused by a lack of major employment opportunities and to reduce the distance travelled to work by local people.
- 8.9 Whilst permission is not sought for detailed design it is important to consider how the sustainability of the proposals can be maximised. It is proposed that the development will achieve a BREEAM rating of 'Very Good'. The Design and Access Statement submitted with this application considers a range of measures which can be utilised to ensure that this standard is reached. These include a variety of active and passive energy saving/producing techniques with the overall aim of reducing energy consumption.
- 8.10 A key aspect of ensuring that development is as sustainable as possible is to ensure that it is accessible. The Transport Assessment submitted with this application contains a draft Green Travel Plan which seeks to maximise car sharing and encourage the use of public transport wherever possible.

Ecology & Landscape Issues

- 8.11 Policy E3 requires that proposals for the site should contain high quality landscaping and should seek to create new habitats for wildlife. A detailed set of landscaping and habitat creation measures are proposed including new tree planting and pond creation. A full description of these proposals is contained within the Ecology and Landscape Mitigation Framework and is illustrated in the accompanying plan. The landscaping proposals are entirely appropriate and fit within the local landscape context; the habitat creation proposals have been agreed with CCW and will result in net benefits for both local wildlife and protected species. The proposals are therefore compliant with the relevant policies in the UDP, the Wales Spatial Plan and Planning Policy for Wales.

Economic Considerations

- 8.12 The proposals offer a highly significant opportunity for the Borough in terms of attracting and retaining employment investment. There is strong demand from a significant local employer (who is seeking to relocate and expand their business) to occupy the unit proposed on plot 3A. This would allow existing jobs to be secured through consolidation of the business and the possibility of significant new job creation through expansion.
- 8.13 TDG have an immediate and pressing need to expand their operations to fulfil their existing commitments and to meet projected demand. The expansion proposals represent a logical development of their existing successful operations in Wrexham. Without this expansion, TDG will not be able to fulfil its forthcoming commitments and it may need to seek the radical step of alternative accommodation outside the Borough, or fail to realise the prospective expansion.
- 8.14 It is clear that there are overriding economic benefits to the proposals. They will help to retain existing jobs within the 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 23% 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.

- 8.15 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 major companies 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'.
- 8.16 The clear economic benefits of the proposals are significant material considerations. In this regard, together with other material considerations they outweigh any conflict with the single user policy (E3).

Design

- 8.17 Planning policy at all levels requires high quality design. Whilst the application does not seek approval for materials or elevational design, the guidance contained within national policy (including the requirement for sustainable development), Planning Policy Wales and the Wrexham UDP has been taken into account. Of particular relevance are the Local Planning Guidance Notes as referred to in the Design and Access Statement, and which have guided evolution of the proposals.
- 8.18 The proposed layout takes account of the site context and has been informed by the findings of the various technical documents and surveys supporting the application including the landscape and transport assessments. The habitat and protected species survey has strongly influenced the location of the buildings so that the maximum level of protection and mitigation possible is available for existing habitat on the site.
- 8.19 Whilst the application is outline and permission is not sought for design, indicative elevations have been submitted which demonstrate the proposed massing of the buildings. The Landscape and Visual Appraisal submitted with the application demonstrates that the proposals will sit well within the existing character of the

industrial estate whilst carefully selected materials and landscaping will limit the impact on views to the open land to the east.

A Technically Robust Scheme

Highways, Access & Parking

8.20 The transport assessment demonstrates (under two scenarios) that the proposals can be safely accommodated on the highway network. Prior to the opening of the new link road, there will only be a limited increase in traffic, due to the fact that the proposed uses employ only shift workers, it is likely that staff will be arriving outside of peak hours, as will delivery vehicles. Additional capacity will be forthcoming and journey times reduced when the new link road is completed in 2011. The proposed access points are illustrated in detail in the transport assessment and are in line with the required standards. The proposals have been discussed and agreed with Wrexham County Borough Highways Department. The Highways Agency and TAITH⁷ have also been involved in pre application discussions.

8.21 The proposed development will adequately provide for car parking (including disabled parking spaces) and HGV operations. Cycle parking will be provided for both developments. The Transport Assessment contains a draft Green Travel Plan which will be developed for each of the proposed users. The plan will promote sustainable transport methods, car sharing and public transport. It is evident that the proposals are fully acceptable in highways terms and therefore comply with relevant planning policy.

Drainage & Flood Risk

8.22 During pre application discussions, the Environment Agency confirmed that a flood risk assessment was not required as the application site is entirely within Zone A and is therefore in the lowest possible category for flood risk. A drainage statement has been submitted with the application which proposes sufficient attenuation to ensure

⁷ TAITH is the joint board of the six county authorities in north Wales working together to deliver substantial and significant improvements to public transport across the region.

that surface water run-off rates will be no greater than existing. Recommendations are given for drainage techniques to be implemented at the detailed stage.

Landscape and Visual Impact

- 8.23 This report has assessed the impact of the proposed development on the surrounding landscape including the visual impact. It concludes that the main impact on landscape character will be in the northern section of the site due to its existing character. The southern section of the site is deemed to be less sensitive given its setting and character type. It is concluded that the proposals will result in a predominantly local impact, which will be limited in terms of its wider impact on the rural landscape. In terms of visual impact the report finds that there will be 3 key receptors affected by the proposals however adequate mitigation to reduce these impacts has been proposed. Implementation of the Landscape and Ecological Mitigation Plan will ensure that the impact of the proposals are as limited as possible.

Trees

- 8.24 The Tree Survey and accompanying report identify the main belt of trees (which bisect the site) as an important landscape feature. These trees are all protected and will not be affected by development. It is considered that their retention is of significance as the habitat will be retained, they will help to screen development and to minimise impacts on the landscape character. Whilst the approach to development is to limit tree losses where possible, there will be some loss as a result of development. Losses will be adequately mitigated for as detailed in the mitigation plan and will form part of a wider area of improved biodiversity.

9 CONCLUSIONS

- 9.1 The application proposals involve development of an allocated employment site adjacent to and effectively forming part of the Wrexham Industrial Estate complex. This site is allocated under policy E3 of the adopted UDP.
- 9.2 The site has been identified for a major single user, for which it has been promoted in the UDP for over 12 years without success. Expert consultants have advised the Council that it is unlikely to be taken up for this form of development.
- 9.3 Two specific user requirements have been identified. Both are major employers in the Borough currently and one already effectively operates from premises on part of the site owned by the applicant, Kingmoor Park Properties. The proposals seek to provide expansion space for this major company to accommodate increased business activity on an adjacent site.
- 9.4 The second intended occupier is an existing local employer which has a requirement for a new plant; this also represents growth of a company with a major local presence and therefore an opportunity to consolidate and further develop this to benefit the local economy, in line with the Council's economic development objectives.
- 9.5 The proposals have been developed to meet both intended occupiers' specific requirements and represent an important opportunity to capture the new investment, jobs and other benefits for the County Borough. The timescales are demanding and it is particularly important that approval in principle for development of the site is granted if these end users are to be secured.
- 9.6 The development scheme has been worked up in close collaboration with CCW and relevant officers, including landscape/ecological, transportation, urban design and others at the Council. Technically the scheme is robust and importantly addresses satisfactorily the particular environmental constraints this site possesses. A major benefit is the comprehensive way in which ecological issues are proposed to be dealt with, allowing the sites to be developed without material harm to protected species, important habitats and landscape impacts, to the long term benefit of the local area.

- 9.7 A sustainable form of development is proposed, commensurate with ensuring the occupiers requirements are met. Detailed measures will be further developed at the reserved matters stage, as detailed design progresses. The buildings will be high quality and appropriate to their setting. Access arrangements have been agreed with the Borough's engineers department.
- 9.8 The proposals represent a major opportunity for the Council and will be seen as a further vote of confidence in the future of Wrexham Industrial Estate. The technical conflict with policy E3 (which is solely in relation to its aspiration for a single user) is more than outweighed by the benefits of the scheme in terms of attracting a strategic scale of new investment; new employment; accommodating the expansion needs of local businesses; environmental and ecological benefits including long term stewardship. We invite the Council to approve this proposal and thereby permit this site to make a full contribution to the continuing economic renaissance of Wrexham.

HOW Planning LLP
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