spawforths

Wrexham Gateway Partnership

Outline Planning Application

Wrexham Gateway – Eastern Zone

Planning Support Statement

Rev B – August 2025

Revision Record

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01 Introduction

1.1 Spawforths have been instructed by Wrexham County Borough Council (WCBC), to produce this Planning Support Statement in respect of the proposed development at land east of Wrexham General Railway Station. The description of development is set out as follows:

OUTLINE PLANNING APPLICATION FOR NEW COMMERCIAL OFFICE BUILDING, CREATION OF PUBLIC REALM AND LANDSCAPING, CONVERSION OF EXISTING BUILDINGS TO BREWERY, WITH ASSOCIATED MUSEUM AND TAPROOM/RESTAURANT, ACCESSIBILITY IMPROVEMENTS INCLUDING NEW HIGHWAY INFRASTRUCTURE AND PEDESTRIAN FOOTBRIDGE, INCLUDING PARKING FACILITIES AND COACH/TAXI DROP OFF, WITH ALL MATTERS RESERVED EXCEPT FOR ACCESS

1.2 To help realise the potential of Wrexham General Station and to achieve a transformational step-change in public transport provision to support sustainable economic growth, WCBC are working alongside Transport for Wales (TfW) and wider partners, to provide integrated multi-modal transport solutions across North Wales. This working group is known as the Wrexham Gateway Partnership. A key aspect of this is to provide a Transport Hub at Wrexham General Station, tying in with local development proposals and sustainable transport aspirations

1.3 The Applicant has taken professional advice from a consultant team and supplementary information has been prepared in support of the Planning Application. This Planning Statement should be read in conjunction with these reports and documents, which are outlined below:

- Design Access Statement (DAS) and Outline Drawings Pack – ***SHR Studio Architecture***
- Transport Assessment & Framework Travel Plan – ***SK Transport Planning***
- Flood Consequences Assessment – ***Civic Engineers***
- Heritage Statement & Archaeological Desk Based Assessment – ***Civic Heritage***
- Phase 1 Ground Investigation – ***Civic Earth***
- Air Quality Assessment & Noise Impact Assessment – ***Hoare Lea***
- Sustainability Appraisal – ***Cushman & Wakefield***
- Preliminary Ecological Appraisal – ***Futures Ecology***
- Tree Survey – ***Ante Group***

02 Site Context and Non-Policy Designations

Site Location and Context:

2.1 Wrexham Gateway Eastern Zone (hereafter referred to as “the Site”) is located directly east of Wrexham General Railway Station, situated just 400m from the heart of the City centre. The Site lies within the WCBC authority area. Wrexham is the largest settlement in North Wales and is the administrative centre of the Borough. The Site area within the red line boundary measures approx. 29,000sqm (7.16 acres) in area.



Figure 1 – Aerial Image of the Site (with approximate red line boundary)

2.2 The 'Eastern Zone' of the Site relates to Station Approach (road), undeveloped land and embankments around the train station and a currently vacant brownfield plot of land, which was formerly a Countrywide Store, that has since been demolished, the former Jewsons Warehouse and associated parking, and the Cambrian Sheds. The existing Site also comprises of Girls Guide and District Scout buildings to the north of the Site entrance.

2.3 The Site gains access via Regent Street (A541) which also borders the southern extent of the Site, with an embankment gradually rising west towards the highway. The Site is bounded by existing trees and shrubs to the east. The Site is bordered and enclosed to the west by the railway station, railway line and associated embankments. Neighbouring uses and features around the Site consist of The Racecourse Football Stadium, a Premier Inn Hotel, a Royal Mail depot, and residential properties to the north-east on Grosvenor Gardens, Spring Gardens and Gerald Street

2.4 The Site is considered to be in a highly sustainable location, due to its strong links to public transport and infrastructure. The Site is positioned directly next to the Wrexham General railway station, which provides direct services to Holyhead, Bidston, Shrewsbury and Cardiff Central. The Site is also located within a reasonable 5-10 minute walking distance from the centre of Wrexham, which gives access to a wide range of facilities and services. Wrexham Central station is also just a 9 minute walk from the Site. Further adding to the public transport options serving the Site, there are bus stops situated along the A541. The Site and it's immediate surrounding area are also well served by established pedestrian footpaths, which will be improved as part of the scheme and the general aspirations for the Wrexham Central Masterplan.

2.5 The Site is located within the development limits and Town Centre Masterplan Area for Wrexham. Whilst the Site is not within a Conservation area, the Grosvenor Road Conservation Area is located 80m to the south-east. The Wrexham Town Centre Conservation Area is also situated 400m south-east of the Site boundary. The Wrexham General Station entrance building is a Grade II listed building. There are no other listed buildings within the Site boundary or immediately neighbouring the Site. A review of information available on Natural Resource Wales shows that the Site does not have any flood risk designations.

Relevant Planning History

2.6 A review of WCBC's web based public access has shown there is no significant planning history considered relevant to the future development of the Site. The planning history for the wider site relates predominantly to applications for works to the Railway Station, prior notification for the demolition of the Countrywide building, and applications related to residential development on Gerald Street (outside the Site boundary). Notwithstanding the above, the planning history for the Site has been outlined within the table below:

LPA REF.	DESCRIPTION OF DEVELOPMENT	SITE ADDRESS	DECISION
P/2021/0480	Listed building consent for installation of security and information systems	Wrexham General Railway Station, Station Approach, Wrexham	Approved – 17/08/2021
P/2021/0054	Listed building consent for canopy refurbishment and maintenance access	Wrexham General Railway Station, Station Approach, Wrexham	Approved – 05/08/2020
P/2020/0688	Prior notification for demolition of buildings	NWF Country Store, Station Approach, Wrexham, LL11 2AA	Approved – 25/11/2020
P/2008/0770	Change of use from railway use to taxi office and cafe retail outlet.	Wrexham General Railway Station, Station Approach, Wrexham	Approved – 07/08/2008

Non-Policy Designations

2.7 Following an appraisal of the Site and its constraints, we have produced the table below to outline all the relevant non-policy designations:

Planning Designations / Planning Consideration	Site Address/ Proximity to Site
Conservation Area	The Site is not within a Conservation area (article 2 (3) land). However, the Grosvenor Road Conservation Area is located 80m south-east of the Site boundary. The Wrexham Town Centre Conservation Area is also situated 400m south-east of the Site boundary.
Listed Buildings	Wrexham General Station entrance building is a Grade II listed building. There are no other listed buildings within the Site boundary or immediately neighboring the Site.

Other Heritage Assets	None on or within close proximity to the Site
Ancient Monuments	None on or within close proximity to the Site
Tree Preservation Orders	Unable to determine due to lack of available information online. Public access does not show any history of applications for works to protected trees within the area.
AONB / Landscape Designation	None on the Site
SSIs / SSSIs	None within close proximity to the Site. The closest of which, the Gatewen Marsh, is located 1km west.
Ecological Designations	None on the Site
Flood Risk Zone	Natural Resources Wales indicates that the site is at very low risk of flooding from rivers and seas (less than 0.1%), however some areas of the Site are at low to medium risk of flooding from surface water and small watercourses (between 1-3%). The area has no record of flooding but does not benefit from flood defences.
Air Quality Management Area	None
Rights of Way	Public Rights of Way cross through the Site along Station Approach, providing access to Wrexham General Railway Station.

03 Development Proposals

3.1 This application is seeking Outline Planning Permission for the redevelopment and regeneration of the Site know as Wrexham Gateway – Eastern Zone. The description of development is as follows:

OUTLINE PLANNING APPLICATION FOR NEW COMMERCIAL OFFICE BUILDING, CREATION OF PUBLIC REALM AND LANDSCAPING, CONVERSION OF EXISTING BUILDINGS TO BREWERY, WITH ASSOCIATED MUSEUM AND TAPROOM/RESTAURANT, ACCESSIBILITY IMPROVEMENTS INCLUDING NEW HIGHWAY INFRASTRUCTURE AND PEDESTRIAN FOOTBRIDGE, INCLUDING PARKING FACILITIES AND COACH/TAXI DROP OFF, WITH ALL MATTERS RESERVED EXCEPT FOR ACCESS

3.2 This application will be seeking outline planning permission, with matters relating to appearance, layout, scale and landscaping reserved from consideration at this stage. As such, details on these aspects of the scheme will be subject to future reserved matters applications, where additional information and confirmation of design will be provided.

3.3 A Design and Access Statement (DAS) has been produced by SHR Studio Architects; this document should be read in conjunction with this planning statement. The DAS provides a detailed description and justification of the design principles and concepts of the proposals, how they respond to the context of the local environment, and how the development will relate to relevant national and local design policies and guidance.

3.4 The development of the Site offers a significant opportunity to create a landmark gateway building on the Site, with improvements to the setting of the station and increasing the legibility and effectiveness of the station forecourt, as well as offering access to new commercial facilities. There is also an opportunity to create better links with the Racecourse Stadium and the university, and a chance to use of the northern area to accommodate a new, larger brewery for Wrexham Lager along with additional related commercial businesses. The creation of a transport hub will help realise the potential of Wrexham General Station, enabling integration between different transport modes for all users, ensuring that end-to-end journeys can be made by sustainable transport modes effectively and safely.

3.5 The proposed outline planning application will seek to deliver the following:

- New commercial office building,
- New public plaza outside the station entrance, with landscaping and seating areas,
- Conversion of former Jewson's Warehouse to brewery for Wrexham Lager
- Conversion of Cambrian sheds to tap room and museum, as part of the Wrexham Lager proposals

- Improved access to the station and the new buildings from Mold Road for pedestrians & cyclists
- New parking facilities including disabled bays, electric vehicle charging, taxi spaces, and dedicated pick up/drop off bays
- New bus stops and waiting facilities
- New cycle storage facilities
- New pedestrian footbridge over railway track from north-end of Site

3.6 The different elements of the development proposals and land uses across the Site are outlined clearly within the Proposed Parameter Plan (drawing reference 7682-al(05)0020-P02).

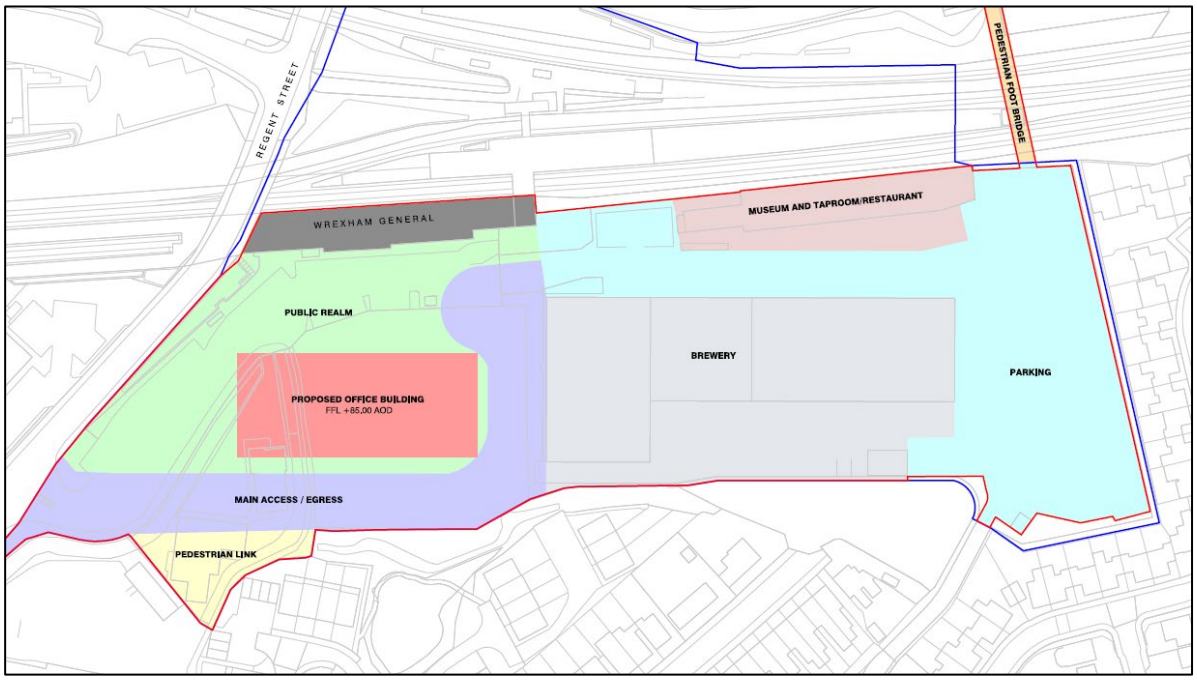


Figure 2 – Extract from Proposed Parameters Plan

3.7 The ambition is to create a Transport Hub which provides a high-quality, and accessible, facility suitable for a city centre location, providing an attractive 'welcome' to the city of Wrexham. The proposal would also tie in with the Central Masterplan's vision to prioritise walking, cycling, wheeling and public transport. The forthcoming application represents the first stage of a wider, comprehensive regeneration project.

3.8 The ultimate objectives for WCBC aim to achieve with the Eastern Gateway and wider proposal are:

- Sustainable travel through the conversion of the station into a multi-modal transport hub
- Regeneration of the surrounding land and uses
- Maximising commercial investment into the area and
- Decarbonisation and Biodiversity

Appearance and Layout:

3.9 The overall principal design strategy for the proposed development is focused on the three core elements of the development proposals – the new commercial office building (also forming part of the transport hub), the Wrexham Lager conversion works and the areas of public realm with accessibility improvements across the Site.

3.10 The existing access will be retained and widened to create improved access arrangements and internal vehicular flow within the Site. This is central to serving the new office building, transport hub, existing train station and parking areas within the Site.

3.11 There is an existing access to the north of the site from Garden Road (part of a residential estate) that had previously been used as a secondary access for the Jewson's Builders' Merchant. The current intention would be to keep this access closed to prevent rat-running through the site, however the aim is to permit access for walking, cycling and wheeling.

3.12 The siting of the new office building is dictated by aim to provide a vehicle-free public plaza directly outside the station as well as the constraints on the Site – which include new highways and access arrangements, requirement to retain existing trees and incorporate soft landscaping areas, and the retention and improvement of pedestrian routes through the Site. The width and depth has been formed by maximising the potential floor plate north to south, while creating an appropriate zone east to west between the new building and the station for the creation of a generous public realm.

3.13 Whilst details on appearance, scale and layout are reserved from consideration, and full details have not been made available for assessment at this stage, it is envisaged that the new commercial office building would likely be 5 stories in height, including roof plant. The massing of the building will be broken down to reduce the impact on the surrounding context. Upper floors have been set back to provide external terraces to office space while creating a lower overall 'building line'. Ground floor areas have been cut and carved to create covered zones. This will facilitate active frontages and natural surveillance along the pedestrian route.

3.14 The Wrexham Lager proposals, consisting a brewery (B2 use class) and associated taproom and museum (Class E / F.1A flexible use) will utilise existing buildings on the Site, with conversion works to facilitate the change of use requiring minimal external alterations to the buildings, and the creation of no additional building footprint. The brewery will require associated apparatus and structures such grain silos and extraction systems, however details on this is not available at this stage.

3.15 The DAS goes into further detail in explaining the concept development for the façade and appearance of the proposed office building. An extract of the Proposed Indicative Site Plan (drawing reference 7682-al(05)0010-P02) below shows the indicative layout of the development proposals.

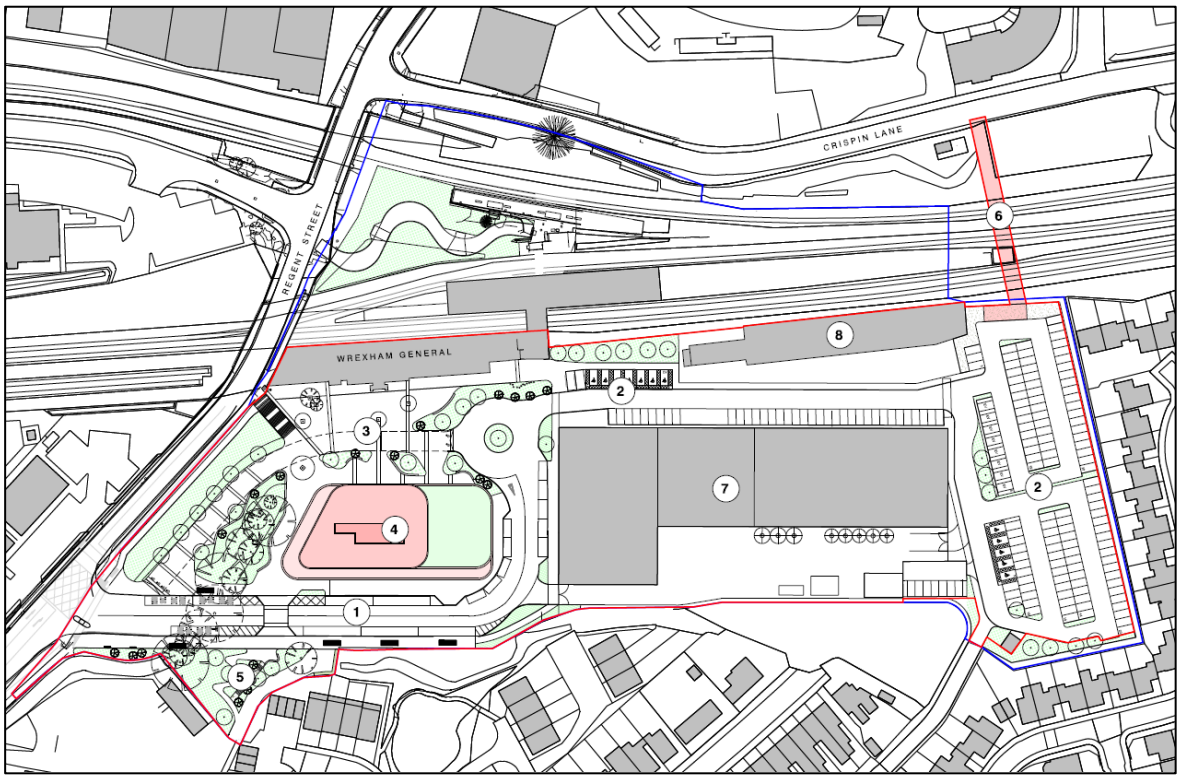


Figure 3 – Extract from Proposed Indicative Site Plan

Accessibility and Movement

3.16 The development will utilise the existing access from Regent Street. The Site is considered to be in a highly sustainable location, due to its strong links to public transport and infrastructure. There are opportunities through developing the area to improve accessibility to the station, create an interconnected transport hub, and also improve pedestrian access and links to the city centre. The existing site access is dominated by vehicles, with stepped access and broken pathways for pedestrians and no dedicated cycle paths for cyclists.

3.17 The proposed development has applied inclusive design principles to both external (shown in the landscaping elements) and internal environments in order to maximise access and egress for disabled people. In particular, the aim is to design an inclusive environment regardless of age or disability. All ground floor uses benefit from a level threshold access with the proposed internal finish floor levels.

3.18 As the scheme is currently in outline, confirmation of final figures on parking provision and delivery of off-site highways improvements will be subject to discussions with the Local Highway Authority and confirmed at reserved matters stage.

3.19 The proposed landscaping and transport infrastructure will be designed to ensure servicing and maintenance of the Site is easily achievable. Consideration will also be provided to allow appropriate emergency vehicle access in and around the site.

Public Realm and Landscaping

3.20 The scheme will seek to create a useable public realm with high quality finishes, seating and spaces to gather. It is acknowledged that the existing site access is dominated by vehicles, with stepped access, broken pathways, and no dedicated cycle paths. There will also be opportunities for increased landscaping and planting, with a pocket garden on the edge of the Site. This ties in with the aim to create an attractive 'welcome' to the city of Wrexham. The proposal would also tie in with the Central Masterplan's vision to prioritise walking, cycling, and public transport.

3.21 There is an opportunity to introduce a secondary green link, which would complement the existing corridor with designed planting and ecological enhancements such as a biodiverse. This secondary link would create a more structured transition between the hard infrastructure and the naturally established green corridor, improving connectivity for both people and wildlife.

3.22 The development will seek to provide a minimum 10% uplift in biodiversity, through planting, landscaping and creation of green corridors. Many of the existing trees on site will be retained where possible, with those removed only out of necessity to facilitate the internal road and new buildings.

04 Statement of Community Involvement

4.1 Applicants are encouraged to carry out meaningful pre-application consultation with the local community and key stakeholders ahead of the preparation and submission of major planning application. Due regard has been given to the 'Pre-application Community Consultation: Best Practice Guidance for Developers: December 2021' produced by the Welsh Government, in devising the public consultation strategy for this project. Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably.

4.2 In accordance with the Part 1A of The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (hereafter referred to as the DMPWO), all major developments are required to be subject to pre-application consultation, prior to the Planning Application being validated by the Local Planning Authority. In the context of the proposed development at this Site, a 'Major Development' is defined as being the provision of a building(s) where the floorspace created exceeds 1,000 sqm and development carried out on a site area exceeding 1 hectare.

4.3 A Pre-Application Consultation Report will be prepared following the conclusion of this process, and submitted to the LPA as part of the forthcoming Outline Planning Application. However, the applicant has carried out a separate community consultation and key stakeholder engagement process in addition to the statutory requirements, as detailed below.

Community Consultation and Key Stakeholder Engagement:

4.4 In line with the advice of the Pre-application Community Consultation: Best Practice Guidance for Developers document, the Applicant created a consultation timeline of activities at the start of the project will help to deliver the non-statutory and statutory engagement activities in a structured and comprehensive manner.

4.5 The Applicant carried out extensive pre-application consultation, commencing on 21st March 2025, with public comments closing on 5th May 2025. This was carried out ahead of the statutory consultation period. It was considered that a 6 week consultation process represented at satisfactory period of time to carry out the activities and allow for those involved to review the proposals and provide their feedback.

4.6 An overview of the pre-application consultation and engagement activities undertaken is as follows:

- Leaflet Drop, 21st March 2025 – Leaflets distributed to approx. 725 properties situated within a 600m radius of the Application Site.
- Full Council Briefing, 25th March 2025 – Presentation to Wrexham Council Members, with Q&A session at the end.

- Design Review Panel, 26th March 2025 – Meeting between Applicant, Design Team and Design Commission for Wales Design Review Panel.
- Website Launch, 31st March 2025 – Consultation web page launched on Transport for Wales (TfW) website. Providing further information on the proposed development and feedback questionnaire.
- First Public Consultation Event, 1st April 2025 – Hosted at Wrexham General Station (within the Site). Information boards and handouts providing information, with attendees able to speak to project team members and ask questions.
- Key Stakeholder Workshop, 7th April 2025 – Presentation to key stakeholders, with Q&A session at the end.
- Second Public Consultation Event, 9th April 2025 – Hosted at Ty Pawb (700m from the Site and in accessible town centre location). Information boards and handouts providing information, with attendees able to speak to project team members and ask questions.
- Statutory Pre-Application Process, 16th July 2024 to 14th August – Formal process carried out in accordance with Section 2C and 2G of the DMPWO. Pre-Application was advertised via site notices, letters to adjoining properties and landowners, direct emails to key stakeholders and statutory consultees. A full submission pack was made available to view in person at Wrexham Library, and also online through Spawforth's website. This process and the responses received are outline in full within the Pre-Application Consultation Report, in order to satisfy the validation requirements for the Outline Planning Application.

4.7 Wider consultation with the general public commenced on 21st March 2025, with consultation leaflets distributed to a total of 725 properties within a 600m radius of the Site. The leaflet provided brief details on the development proposals and the Site. The leaflet also advertised the upcoming consultation events, provided links to website and contact details for feedback.

4.8 In order to provide a greater level of detail on the development proposals, and to provide a platform allowing members of the public to provide their feedback, a consultation web page was set up through Transport for Wales (TfW), who are a key member of the Wrexham Gateway Partnership. The web page advised that 'All comments received will be considered and where possible and practical will be used to inform the proposed development', and provided a survey to give feedback on the proposals, as well as contact details for any direct communication and questions.

4.9 Two public consultation events were held within Wrexham. The first taking place at Wrexham General Railway Station on 1st April, and the second at Ty Pawb art gallery and community centre on 9th April. These venues were chose as appropriately located an accessible within Wrexham, as well as being well known to the local community. Members of the public were invited to attend from 10:00 to 16:00. Information boards were available to provide further details on the scheme, along with large copies of the indicative masterplan. The event was staffed by representatives from the Gateway Partnership, Spawforths, Transport for Wales and the design team, to discuss with members of the public and answer questions.

4.10 Key Stakeholder Engagement was undertaken through online meetings hosted on 25th March and 7th April. This consisted of a presentation to members, given by the project managers from the

Wrexham Gateway Partnership, with an opportunity for questions and discussions at the end. The purpose of the briefings were to:

- Provide an overview of the vision for Wrexham Gateway Eastern Development Zone and the development proposals
- Ensure members and key stakeholders are aware of the programme and timescales for both the public consultation programme and planning application submission.
- Give members and key stakeholders the opportunity to raise any concerns and opportunities ahead of the wider consultation and finalisation of design.

4.11 A total of 259 responses were received to the survey on the TfW Consultation Page, along with 12 additional written responses were received in from members of the public. This consisted of emails received in response to the leaflets and consultation, and handwritten feedback forms submitted at the event by attendees.

4.12 The table below shows the written feedback, along with general issues and topics raised in discussions with members of the community as part of the public consultation exercise.

Topic / Issue	Comments Received	Developer Response
Principle of Development	General support for the principle of redeveloping the Site.	The Applicant is encouraged by the general positive consensus from the Wrexham Community regarding redeveloping the Site, and what positives this can bring.
	Questions raised on alternative uses for the Site – including multi-storey car parking, and retail and F&B facilities.	Alternative uses for the site were explored as part of the capacity surveys and feasibility studies. It was ultimately determined that the transport hub, office floorspace and areas of public realm were optimum uses of the Site.
Highways Impact & Traffic	Concerns with increased traffic and how this will impact the wider road network, with Mold Road / Regent Street already very congested.	The Site is in a highly accessible location, which will encourage uses of the Site and visitors to Wrexham to use active travel, such as train, bus, cycling and walking. The development is supported by a Transport Assessment which has assessed the traffic modelling for the development and concludes there will not be a significant impact on the highway network or capacity issues.

	Has an alternative or secondary access through the north end of the Site.	It is considered there are no appropriate points for this, and that the existing access onto Mold Road / Regent Street is satisfactory in serving the Site, with improvements to the access and junction as proposed. There is an existing access to the north of the site from Garden Road (part of a residential estate) that had previously been used as a secondary access for the Jewsons Builders' Merchant. The current intention would be to keep this access closed to prevent rat-running through the site, however the aim is to permit access for walking, cycling and wheeling.
Design	Concerns raised regarding design of office building and how this will impact the station building,	It is assessed that the site, in its current form, is having a negative impact on visual amenity, and that the proposals to bring a building of high quality design onto the Site will improve the existing situation, without having a detrimental impact on the setting of the listed building.
Landscaping & Trees	Would wish to see the retention of trees across the site, in particular those bordering residential properties to Spring Gardens and Grosvenor Gardens	This theme is central to the ambition of the development, with trees being retained where practicable, and reinforced with further planting and soft landscaping features. The tree survey will determine what trees are of poor condition and appropriate for removal.
Ecology	Impact on ecology and existing wildlife	The scheme will seek to deliver a 10% Biodiversity Net Gain across the Site, with retention of existing trees, improved landscaping and planting. There will be scope for further ecological improvements and features. The surveys conducted by specialist ecologists confirm no loss of protected or key habitats is anticipated. The majority of the site is previously developed land and currently consists of hardstanding and buildings.
Residential Amenity	Impacts on existing residents during construction phase through disturbance etc	This will be managed through a Construction Management Plan, which will be approved by the Council and dictate matters such as delivery vehicle movements, working hours, wheel wash facilities etc. to ensure any impact is minimised. Furthermore, this will ultimately be a short term disruption, and not a

		permanent impact, therefore will not result in significant harm caused.
	Impact of overlooking and loss or privacy caused by office building on the closest neighbouring properties.	The separation distance from the office building to the closest residential properties is measured to be 36.00m, and is assessed to be satisfactory in not resulting in any significant harm through residential amenity. It is also worth noting that, as a commercial building, it will primarily only be in use during typical daytime working hours of 9am to 5pm, from Monday to Friday. Therefore lessening any impact by nature of the proposed use.
Air & Noise Pollution	Concerns that increase in vehicles and users of the Site will result in increased air and noise pollution.	The outline application is supported by a noise impact assessment and air quality assessment. These determine there will be no significantly adverse impact from the development proposals, and suggest mitigation measures to ensure protection from these impacts during the construction and operational phase of the development. These will be secured via a planning condition on any approval.
	Impacts from proposed use of former Jewson building by Wrexham Lager for brewery and taproom.	It should be noted that this currently sits outside the development proposals for the forthcoming Outline Planning Application. Once further details are available for the potential use of this section of the Site by Wrexham Lager as a brewery and taproom, these will be available for public consultation and included in any future planning proposals. However, it is our understanding that odour was an issue that Wrexham Lager previously had at their current premises, and they took measures to eliminate this problem. We would anticipate that this would also be applied to this Site, should they become occupants.
Other	Potential for pocket garden and areas of public realm to be used for anti-social behaviour.	It is acknowledged that public spaces and green spaces can be used for anti-social behaviour. However, this in itself should not represent a reason to stop creating such spaces for benefit of the general public and local community. The proposed development will take on board 'Designing Out Crime' measures to ensure that areas of public open space are safe and legible

		for use. This can include measures such as natural surveillance, active frontages and defensible boundaries, appropriate lighting and other surveillance or management measures, such as CCTV. This will be incorporated into the future design of the development.
	Members of the public not consulted or did not receive a leaflet	Unfortunately, we are not able to directly reach all members of the Wrexham Community, and no leaflet distribution can guarantee a 100% delivery rate. Reasonable measures were taken to inform as many members of the public as possible. The attendance of the two events and number of responses received on TfW's consultation page showed a high level of engagement and outreach.
	General and/or unspecified concern with the scheme.	The Applicant has no response to general and unspecified concerns raised. The material planning considerations and benefits of the scheme will be presented and justified as part of the planning application submission.
	Not enough detail provided in the proposals.	The proposal is in Outline, seeking to establish the suitability of the principal of development, and access arrangements for the Site. Further details on scale, appearance, layout and landscaping will be provided at a later stage – however illustrative material has been provided to help the public visualise the scheme.

4.13 The survey results from the TfW consultation web page have also captured the opinion of the Wrexham community through multiple choice questions. It is noted that 86.1% of respondents live in Wrexham, with 5.0% working in Wrexham but living elsewhere. The full results will be attached as an appendix to the Pre-Application Consultation report, however some of the headline results are as follows:

- 153 out of 259 respondents (59.1%) strongly agreed that they were supportive of the proposals for the Wrexham Gateway Eastern Development Zone, with 57 (22.0%) stating they somewhat agree, 15 (5.8%) neither agree or disagree, 22 (8.55) somewhat disagreeing, and only 12 (4.6%) strongly disagreeing. This shows that the general public were broadly supportive of the development proposals, with very few being strongly against.

- 155 out of 259 (59.8%) respondents stated they strongly agreed that the proposals would have a positive impact on the local area.
- 121 out of 259 (46.7%) strongly agreed with the statement that *"Walking, wheeling and cycling accessibility to Wrexham General Station would be improved".* Furthermore, 174 respondents (67.2%) strongly agreed with the statement that "*The arrival into the City of Wrexham would be enhanced."*
- 67.2% of respondents strongly agreed that the proposals would enhance the arrival into the City of Wrexham, with 55.6% strongly agreeing it would make changing between rail and bus services easier, and 36.3% strongly agreeing the proposals would make them more likely to use active travel (not including rail) to get to Wrexham General Station.

4.14 A selection of some of the features that respondents wished to see incorporated into the development proposals are listed below, along with the developers response on whether they can be implemented

Suggested Feature	**Developer Response**
Underground car park facility to offer more spaces to locals and visitors to park if they wish to drive to the station	The applicant has carried out capacity surveys and feasibility studies to understand parking demand and requirements for the Site. In assessing whether a form of multi-storey parking facility would be appropriate for the Site, it was determined that there was insufficient demand for this (outside of matchdays for Wrexham AFC), and the existing road network would not otherwise be able to support a significant increase in vehicles using the Site. Furthermore, central to the vision for the scheme is encouragement of use of public transport and active travel, such as walking and cycling. As such, it is not the ambition to provide an excess of parking facilities when these sustainable travel modes are readily available from the Site.
Retail and shopping facilities	It is not envisaged that retail and shopping facilities will be delivered as part of this scheme. Including such facilities would detract from existing retail offering within the town centre.
Cafés and restaurants	Whilst there will be some food and beverage offering, it is not envisaged that units will be available for cafes and restaurants. The exception to this being the potential for Wrexham Lager to take over the former Jewson Warehouse, providing a tap room as part of the brewery. WCBC has carried out retail needs assessment for the Site,

	and the vision is to avoid bringing cafés and restaurants into the ground floor of the office building, as it will detract from existing facilities within the town centre. Furthermore, it is considered that other uses, such as the Transport Hub, represent a more optimum use of this space.
Bus route from Site to the local hospital	The Applicant is ultimately not responsible for selecting the bus services that will operate from stops within the Site. This will be down to the bus service providers in assessing demand for services, or whether the NHS would provide this. The applicant will look to explore the feasibility of this.
Electronic displays of train and bus arrivals and departures	It is envisaged that this will be implemented as part of the scheme, with further details provided at a later stage of the design and planning process.
E-bike rental facilities and charging points	This is an element that is considered as part of the transport hub and cycle store facilities, with further details provided at a later stage of the design and planning process.
Public and accessible toilets	This will be provided as standard.
Incorporation of artwork, murals and a unique 'Welcome to Wrexham' sign.	These are aspects which can be considered as part of the final detailed design for the scheme, and sit separately from the planning process.
Tourist centre & information boards	Whilst this is not something currently under consideration for the scheme, it can be explored further – with basic signage and information likely to be provided.
An events space	This is an element which can be considered for future use as part of the area of public realm, but only as a secondary function. This would be subject to full details on design and whether the public realm would be practical for this.
Incorporation of trees, planting and green walls	As per the outline proposals, there will be significant landscaping and planting across the Site – as the development seeks to deliver a net gain in biodiversity and create pleasant areas of public realm. Landscaping details are not finalised as part of this proposal, however green walls and be considered where practical to implement.

05 Statutory Policy Context

5.1 Section 38 of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing. This section of the Planning Support Statement identifies the planning policies and other material considerations which are relevant to this proposed development.

Statutory Development Plan:

5.2 The current statutory development plan for the Wrexham CBC consists of the following documents and policies:

- Future Wales: The National Plan 2040 (FW) – This is the national-level development plan issued by the Welsh Government and forms the top-tier spatial strategy for Wales—legally part of Wrexham's development plan.
- Wrexham Unitary Development Plan (UDP) 1996–2011 – Adopted in 2005, the UDP is currently the council's local framework in use, pending replacement

Legal Background to the Wrexham LDP:

5.3 The Wrexham Local Development Plan (LDP) was twice rejected by the full Council in April and June 2023. This was due to concerns over high housing numbers, low provision of affordance homes and loss of greenfield land.

5.4 A consortium of major developers pursued a Judicial Review, arguing that once an independent inspector deemed the plan "sound", the Council had no legal basis to refuse it. In November 2023, the high court forced the adoption of the LPD. On 20th December 2023, the LPD was formally adopted following an extraordinary full Council meeting, although a significant number of elected members abstained from voting.

5.5 In January 2025, the Court of Appeal ruled that the Council was not legally obliged to adopt the LDP, with the initial high court order overturned. Following the ruling, the Welsh Government appealed to the Supreme Court, with the decision in April 2025 a dismissal in the Council's favour, creating further uncertainty on the adoption of the LDP.

5.6 In summary, the LDP was initially adopted under legal compulsion, but its legal foundation has since been called into question. Until the Supreme Court rules definitively, its status remains effectively in limbo — procedurally in place, but potentially unenforceable. Planning decisions might temporarily revert to older policies. Practically, the Council has adopted the LDP, but it may be legally challenged and potentially voided.

5.7 Where this leaves Wrexham CBC is that, in terms of decision making, the UPD and FW are the starting point for assessing planning applications. However, because the unadopted LDP has been subject to an Examination in Public and been found sound, it is a material consideration of significant weight.

5.8 Section 38(6) of the 2004 Act states that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The quashing of the Full Council vote therefore means the UDP becomes the starting point for determining planning applications once again. The UDP was formally adopted in February 2005. However, the plan is now out of date being underpinned by an evidence base that is over 20 years old. This has already been confirmed in recent years by applications and appeals allowed for developments that do not conform with UDP policies. In all cases, there have been material considerations, including evidence prepared to underpin the unadopted LDP, that have been considered to carry sufficient weight to justify a departure from certain UDP policies.

5.9 The evidence that underpins the unadopted LDP is, in every respect more up to date then the evidence that underpins the UDP. Moreover, the unadopted LDP provides a planning framework for the County Borough for 2013-2028, in contrast to the UDP which was adopted to provide a plan for 1996-2011

Wrexham Unitary Development Plan (UDP) 1996–2011:

5.10 The UDP 1996–2011 served as Wrexham's key planning document, aiming to shape growth via:

- Clear policy and mapped designations
- Strong support for economic growth and industrial site revival
- Protection of environmental buffers and settlement patterns
- Emphasis on regeneration of inner-city sites
- Strategies to tackle housing affordability and demographic change
- Revitalisation of the retail and leisure offer in Wrexham town centre

5.11 This document provided the statutory framework for land-use planning until superseded in 2011. Due to the issues surrounding the adoption of the LDP, Wrexham CBC would revert to using the old 1996–2011 UDP backed by Future Wales 2040 policies.

Wrexham Local Development Plan (LDP) 2013–2028:

5.12 The Site is located within the Wrexham City Centre Masterplan Area (Policy R2), as per the adopted Proposals Map for the City Centre. With the location of the railway station at the Site, the land is also within a Wrexham General Transport Hub (Policy T4) and Mineral Railhead Safeguard area (Policy MW1). The Site however is not specifically allocated for housing, retail or employment uses.

5.13 The Wrexham City Centre Proposal Map (Inset 2) has been appended to this document (Appendix 1) to show the designations for the Site, within the context of Wrexham City Centre.

5.14 The policies contained within the Wrexham Local Development Plan (LDP) considered relevant to the proposed development have been outlined below:

Policy	Summary	Policy	Summary
SP2	Location of Development	SP6	Planning Obligations
SP8	Wrexham Town	SP9	Economic Growth Employment and Enterprise
SP12	Transport and Accessibility	SP13	Design Principles & Masterplanning Framework
SP14	Health and Wellbeing	SP15	Natural Environment
SP16	Historic and Cultural Environment	SP18	Climate Change
SP19	Green Infrastructure	DM1	Development Management Considerations
NE3	Trees, Woodlands and Hedgerows	T1	Managing Transport Impacts
T2	Active Travel	T3	Passenger Transport
T4	Wrexham General Transport Hub	T6	Strategic Transport Infrastructure Improvements
R2	Development within the Wrexham Town Centre Masterplan Area	RE1	Development and Renewable Energy/Low Carbon Technology

5.15 Local Plan Policy SP2 titled 'Location of Development' seeks to direct development to the most suitable locations within the County Borough in accordance with sustainable development principles set out in national planning policy. This policy establishes the settlement hierarchy for the district, confirming the priorities for housing and employment growth, based on the need for development plans to secure sustainable settlement patterns which meet the needs of the economy, environment and health.

5.16 Local Plan Policy R2, titled 'Development within the Wrexham City Centre Masterplan Area', aims to ensure development proposals within this area support the regeneration, renewal and enhancement of Wrexham City centre and are compatible with the masterplan vision, objectives and aims. This should be achieved through improving the City's sense of identity, visitor experience, accessibility and connectivity, evening economy, city centre living and green infrastructure.

5.17 The Wrexham Town Centre Masterplan document (Adopted April 2016) seeks to improve pedestrian flows from the Site, with potential for housing development opposite the football stadium and mixed use development within the Site. The masterplan also seeks to protect and enhance the existing railway stations, considered development which may affect these and how routes to and from can be enhanced.

5.18 Local Plan Policy T4 titled 'Wrexham General Transport Hub' seeks to support the development of Wrexham General Station with enhanced transport interchange facilities, infrastructure and services, improve Site access and walking/cycling routes, and to create an attractive, legible and vibrant environment, which safeguards the setting of the Listed Building.

5.19 Policy SP8 titled 'Wrexham Town', also highlights the importance of and directly references Wrexham General, stating that *"the growth and sustainability of the County Borough and wider sub-regional area is closely linked to delivering sustainable growth in Wrexham, which is supported and enabled by infrastructure, including transport. Providing growth and infrastructure in Wrexham will help ensure opportunities and services are accessible to residents both within the town and wider area. With planned investment in transport infrastructure along the A483 (T) road and a transport hub at Wrexham General Station, this will further strengthen the regional function of the town."*

National Planning Policy

5.20 The National Development Framework for Wales is the 'Future Wales: The National Plan 2040'. This document establishes a 20 year land use framework for Wales. This should be read alongside Planning Policy Wales (PPW) and forms part of the statutory development plan and provides the starting point for regional Strategic Development Plans.

5.21 Future Wales is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

5.22 Future Wales will guide public and private investment. It was published in February 2021 and replaces the Wales Spatial Plan. The following policies are considered to be relevant to the Application Site:

- *Policy 1 – Where Wales will grow*

- *Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking*
- *Policy 3 – Supporting Urban Growth and Regeneration – Public Sector Leadership*
- *Policy 8 – Flooding*
- *Policy 9 – Resilient Ecological Networks and Green Infrastructure*
- *Policy 11 – National Connectivity*
- *Policy 12 – Regional Connectivity*
- *Policy 19 – Strategic Policies for Regional Planning*
- *Policy 20 – National Growth Area – Wrexham and Deeside*

5.23 Policy 20 reiterates that the Welsh Government supports Wrexham and Deeside as the primary focus for regional growth and investment. The National Growth Area includes Wrexham, Wrexham Industrial Area, Broughton, Buckley, Deeside and the Deeside Industrial Park.

5.24 The location should be focused on strategic housing, economic growth, essential services and facilities, advanced manufacturing and transport infrastructure. It is stated that the Welsh Government will work to ensure key investment decisions support Wrexham and Deeside and the wider region and to promote and enhance the strategic role of Wrexham and Deeside.

Planning Policy Wales (PPW)

5.25 National policy and guidance are provided in Planning Policy Wales (PPW) Edition 11 and is supplemented by a series of Technical Advice Notes (TAN's). PPW sets out the key land use planning policies of the Welsh Assembly Government. The document is a strategic framework to guide the future of both development and policy interventions in Wales.

5.26 This document is separated into subject areas and chapters. The following subject areas and chapters considered to be relevant to the proposed development are as follows:

- *People and Places: Achieving Well-being through Place making*
- *Good Design making Better Places*
- *Sustainable Management of Natural Resources*
- *Environmental Sustainability*
- *Moving within and between places: Transport*
- *Productive and Enterprising Places: Economic Development*
- *Distinctive and Natural Places*

5.27 The primary objective of the PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales. PPW promotes action at all levels of the planning process which is conducive to maximizing its contribution to the well-being of Wales and its communities.

Technical Advice Notes (TANs)

5.28 A series of TANs provide additional national planning guidance alongside PPW. We have had regard to the following policies and TANs which we believe to be relevant to the Proposed Development:

- TAN 4 – Retail and Commercial Development (2016)
- TAN 12 – Design (2016)
- TAN 18 – Transport (2007)
- TAN 23 – Economic Development (2014)
- TAN 24 – The Historic Environment (2017)

06 Reasoned Justification of Proposed Development

6.1 This section of the report will demonstrate that the application proposals fully accord with the provisions of the statutory Development Plan and that there are no material considerations or technical matters which would warrant a refusal of planning permission for this scheme.

6.2 As such, this section of the report will evaluate the proposed development against the following key considerations:

- Principle of Development
- Design and Visual Amenity
- Highways and Transportation
- Other Material Considerations and Technical Matters

Principle of Development:

6.3 Local Plan Policy SP2 'Location of Development' requires new development to be direct to the defined settlement limits and employment areas as identified within the Local Plan Proposals Map. This is to ensure that any new growth is within the areas deemed to be most suitable, in compliance with the principles of sustainable development as outlined within national planning policy.

6.4 The settlement hierarchy identifies a framework for the location of new development based on an assessment of each settlements existing facilities and services, capacity, infrastructure, employment opportunity, planning constraints, viability and opportunities for new development which has been informed by the sites assessment process. The Local Plan seeks to direct the majority of new development to Wrexham Town (Policy SP8), defined in the Wales Spatial Plan (2008) as a Settlement of National Importance. The settlement hierarchy for Wrexham County Borough identifies Wrexham Town as a Primary Key Settlement with a range of facilities and services. Directing new development to this area will make the best use of existing infrastructure and services and allows homes, jobs and other facilities to be located in close proximity to each other, reducing the need to travel by car.

6.5 As previously established, the Site is located within the defined settlement limits for Wrexham, which is the most sustainable settlement within the district, as per the settlement hierarchy. Policy SP2 states that within Wrexham, *"New development in the town will be delivered over the plan period through the redevelopment of brownfield site allocations, the release of Key Strategic Site (KSS) allocations (see policy SP3, SP4 and SP5) on the edge of the settlement and also via an element of windfall development opportunities."*

6.6 The proposed development is therefore considered to be an appropriate location as set out within the Statutory Development Plan, within the most sustainable settlement within the district, as defined within the settlement hierarchy. It is therefore assessed that the overarching principle of development on this Site is acceptable.

6.7 Local Plan Policy SP8 'Wrexham Town' notes that Wrexham Town has a critical role to play in the success of the region, acts as an important service and employment centre for surrounding settlements including the rural hinterland and is the principal area where the majority of new growth over the Plan period is directed. This policy states that *"The plan places significant emphasis on Wrexham Town and defines it as the Primary Key Settlement within the County Borough. Wrexham Town has a critical role to play in the success of the region, acts as an important service and employment centre for surrounding settlements including the rural hinterland and is the principal area where the majority of new growth over the Plan period is directed".* The proposed development, in delivering key investment and economic development within the primary key settlement, will directly relate to aspirations of Policy SP8.

6.8 Policy T4 'Wrexham General Transport Hub' states that support will be given to the development of Wrexham General Station. The ambition is to create a local and regionally integrated transport hub which:

- *Facilitate enhanced transport interchange facilities, infrastructure and services that provide for the seamless, safe and efficient transfer of passengers between modes,*
- *Provides passenger facilities, including but not limited to seating, information, toilet facilities small scale retail, café, takeaway and cycle parking,*
- *Facilitates enhanced rail services, line-speed and capacity improvements,*
- *Improves site access for public transport modes,*
- *Improves walking and cycling between the station and key destinations including Wrexham*
- *Town Centre, Glyndwr University, Wrexham Maelor Hospital and the Western Gateway*
- *Business Park including improved public realm and crossing points,*
- *Provide a public transport gateway of a high aesthetic and functional quality, which is*
- *Commensurate to the towns status as a nationally important settlement,*
- *Provides an attractive, legible and vibrant environment; and*
- *Safeguards the setting of the Listed Building*

6.9 This planning statement and submission will demonstrate that the proposed development will have the potential to achieve all the aims set out above for the transport hub, subject to approval of reserved matters submissions which confirm details on appearance, scale, layout and landscaping. Notwithstanding, this outline application shows that the design will be of a high quality.

6.10 The Site is located within the Wrexham Town Centre Masterplan Area. Policy R2 states that development proposals within the defined Wrexham Town Centre Masterplan area should the regeneration, renewal and enhancement of Wrexham town centre, and be compatible with the Wrexham Town Centre Masterplan vision, objectives and aims. The masterplan sets out to improve identity of the town centre, improve visitor experience and improve town centre accessibility, both into the town and circulation within the town.

6.11 The principle of developing the Site to create a commercial office, a transport hub, the Wrexham lager proposals and areas of public realm with accessibility improvements is considered to relate positively to the aspirations of the Statutory Development Plan, directly complying with the requirements of Policies SP2, SP8, T4 and R2 of the Wrexham Local Development Plan, as well as being compatible with the vision, objectives and aims of the Wrexham Town Centre Masterplan, and the requirements of national planning policy.

Design and Visual Amenity

6.12 As previously noted, a Design and Access Statement (DAS) has been produced by SHR Studio Architecture, this document should be read in conjunction with this planning statement. This document provides description and justification for the design principles of the proposed development, detailing how it responds to the context of the local environment, and how the development will relate to relevant national and local design policies and guidance.

6.13 At this stage, it is acknowledged that the details on design and layout put forward within this outline planning application are indicative, with detailed design to be put forward for full consideration and assessment within any subsequent reserved matters submission, which will seek consideration of matters relating to Appearance, Layout and Scale.

6.14 Whilst the nature of this outline planning application does not enable a full consideration of details on design matters, it is assessed that based on the indicative information provide, the proposed development will have the potential to comply with Local and National Policy requirements in relation to design, with further details to be submitted at Reserved Matters.

6.15 The proposed development will seek to deliver high quality regeneration and built form to an area that is currently underutilised. The design approach has sought to create a strong sense of community through a landmark building on the Site, with well-defined areas of public open space and positive, distinctive and high quality design, that both respects and enhances the context of the area. The 'Concept Development' section of the DAS explores how the history and character of Wrexham will inspire the design of the landmark building (commercial office building), through a façade that is influenced by the Cambrian Iron Works and Pontcysllte Aqueduct, which will leave a lasting marker of the modern day regeneration of Wrexham through the Gateway project. Taking cues from its rich historic context, the scheme intends to provide a contemporary interpretation of the industrial uses and structures.

Highways and Transportation

6.16 A Transport Assessment (TA) and Framework Travel Plan (FTP) have been provided by SK Transport Planning. This comprehensive study will assess the potential transportation impact of the

proposed development, taking into account the site location, type od development, anticipated number of trips generated and the capacity of the existing transportation network.

6.17 Policy SP11 of the Local Development Plan states that "Wrexham's transport network will be developed in a safe, efficient and sustainable manner", with development proposals expected to avoid having an n unacceptable impact on the safe and efficient operation of the transport network. Also key to this policy is developing the coverage of the Active Travel Network across Wrexham to promote increased use of walking and cycling as safe, viable and sustainable alternatives to the private car.

6.18 The proposal seeks to deliver improved integration between different transport modes at the station to support a high quality and accessible facility for a city centre location and also to support the development of a new Gateway Building (commercial office) on Station Approach and the reuse of the currently vacant buildings on Site as part of the Wrexham Lager proposals.

6.19 The TA has confirmed that the Site is in a highly accessible location, with the proposals incorporate enhanced pedestrian and cycle facilities forming part of the Active Travel improvement scheme and also enhanced segregated pedestrian access connections to existing pedestrian routes. The site is clearly well related to the station and will also provide three bus stops to accommodate planned increases in bus service provision and frequencies.

6.20 Vehicle access to the site is currently provided via a ghost island priority junction on the A541 (Mold Road). A pedestrian refuge crossing is provided on Station Approach, with tactile paving and dropped kerbs. Pedestrian access is provided at the current vehicle access junction, with 3.7m wide footways. The station is currently served by 67 parking spaces, including 5 disabled bays. There are no drop-off/collection spaces at the site, but users are able to utilise the car park.

6.21 The proposed signalised access arrangement will incorporate pedestrian crossing facilities on Mold Road and across the site access, the latter aligning with the active travel route to incorporate pedestrian and cycle crossings. Pedestrian access from Mold Road into the western corner of the Site will be improved through a 5.00m wide stepped arrangement. The existing pedestrian access route from Gerald Street will also be retained and enhanced. A 12.00m wider access road will form the main access corridor though the site, with an internal roundabout provided. Swept path analysis has been undertaken for relevant vehicle types and is shown in Appendix D of the TA. It is considered that the proposed vehicular and pedestrian access arrangements to the Site are acceptable in highway safety terms and are appropriate in serving the Site.

6.22 The network operational assessments have been carried out to test the future network for a range of scenarios considering changes in demand levels over the period to 2030 in line with the work undertaken at WelTAG Stage 2. The proposed development results in an increase in traffic movements but the effects on network performance are minor, and demonstrably far less than the traffic associated with events at the Racecourse Ground as can be seen from comparison of the results in the different assessment scenarios.

6.23 The FTP (included as an appendix within the TA) has been prepared to specifically relate to the new commercial office building which forms part of the development proposals. The Travel Plan will outline the existing accessibility of the site, infrastructure measures included as part of the development, and management and policy measures for adoption at the site to promote use of sustainable modes. With the application being in Outline, a Framework version has been provided. The FTP version has been prepared to set out the measures and strategy that will be taken forward

for the site on occupation, including the means of monitoring progress and disseminating information to staff.

6.24 The aims of the Travel Plan are to maximise trips by active/sustainable modes of travel and to reduce the number of single occupancy private car trips. The objectives to achieve these aims are to raise awareness of the travel choices available, provide travel packs that can be issued to staff, periodically evaluate the transport needs of staff and periodically update operators/staff to make sure they have all relevant travel information.

6.25 The Proposed Development is assessed to be safe in highways terms and will not result in any severe residual cumulative highway impacts. The supporting technical evidence has demonstrated that the proposed scheme will be acceptable in regards to transport sustainability, highway safety and traffic impact, and that there are no transport related reasons why planning consent for the proposed development should not be granted. The development is fully compliant with the requirements of Policies SP11 of the Local Development Plan.

Other Material Considerations and Technical Matters:

6.26 The following material and technical considerations listed in the headings below are considered to be relevant to the proposed development, based on the context of the area and constraints on the Site. These factors have been supported by the relevant technical reports provided by specialist consultants, these reports should be read in conjunction with this Planning Support statement.

Trees

6.27 An Arboricultural Survey has been undertaken by Antea Group. The Tree Survey provides a categorisation of the trees on Site, outlining their quality (Category A, B, C or U), based on structural and physiological condition, as well as calculating the root protection area. The report is also to recommend tree management or mitigation measures where appropriate.

6.28 The results of the desk search undertaken by email request to Wrexham County Borough Council on 17.06.25 indicate that all trees within the Site are outside of any Conservation Area. No trees on-Site nor on land adjacent to the Site are covered by a TPO.

6.29 A total of 25 trees and 14 tree groups have been identified and assessed as part of the tree survey. All trees surveyed with the exception of six Tree Groups (TG) and five individual Trees (T) were within the Site boundary. The distribution of the trees and tree groups across the Site is limited to being randomly dispersed along the boundaries of the Site, adjacent to car parking along Station Approach and on embankments associated with railway. Five individuals tree and six tree groups are also present off-Site, immediately adjacent to the eastern and western boundaries, with canopies that extends into the Site. It was ultimately found that none of the trees on Site were Category A.

6.30 The trees present within the Site range from mature to young, with the majority semi-mature. A number of trees within the Site boundary show signs of past management, mainly in the form of canopy lifting and reduction where canopies extend over areas of vehicular or pedestrian accesses. The majority of on-Site trees appear to be in a fair condition. A number of ash trees (T2, T3, T21) display signs of ash dieback disease Hymenoscyphus fraxineus while an Austrian pine (T23) had a severely damaged main stem.

6.31 The Arboricultural Survey has made a series of recommendations for adequate tree protection during the works and for tree removals. Trees T2, T3 and T21 all display signs of ash dieback and should be removed, with a suitable replacement planted, and T23 with a damaged main stem should also be removed.

6.32 At this stage, the layout of the scheme is indicative, with this matter reserved from consideration. Notwithstanding this, it is envisage that many of the trees on Site within Categories B and C can be retained and incorporated into the landscaping and areas of public realm.

6.33 The proposals do not impact upon the special categories of trees that are given prominence within the national planning policy, and make provision for new tree planting as part of the wider landscaping proposals for areas of public realm. The development is therefore considered to relate well to the guidance and aspirations of the Local Plan and will not contravene any national planning policy in relation to the protection of trees.

Ecology and Biodiversity

6.34 An Ecological Impact Assessment (EcIA) and Biodiversity Report have been undertaken by Futures Ecology. These reports identify the important ecological features that could be affected by the proposed development or warrant consideration due to the legal protection afforded to them, and the likely effects upon biodiversity based on the indicative information available on the development proposals.

6.35 In accordance the national planning policy for Wales PPW (Welsh Government 2024) and The Environment Act 2021, the development should seek to enhance biodiversity and provide a net benefit.

6.36 To facilitate the development, a total of 11 trees, introduced shrub, scrub and ephemeral / short perennial will be lost. The remaining habitats incorporated into the new layout with additional tree planting, wildflower grassland and native scrub. The ecological report recommends that additional measures for consideration include new landscape planting including trees and shrubs to use native species which bear fruit and nectar.

6.37 The assessment found that no impacts are expected in relation to any of the designated sites or habitats of principal importance within the specified zones of influence. Some buildings were identified as providing potential roosting habitat for bats and, as a result, will be subject to further nocturnal surveys to determine whether a roost is present. Impacts during the installation of the proposed development on retained habitats will be minimised through the careful control of ground works activities through industry best practice.

6.38 With the implementation of the mitigation measures described within the EcIA, no significant adverse residual effects are envisaged upon any Important Ecological Features as a result of the proposed development.

6.39 Futures Ecology have also undertaken a Biodiversity Impact Assessment (BIA), with calculations using the Statutory Biodiversity Metric (SBM) Calculation Tool. Post development, the onsite habitat retention, enhancement, and creation (Figure 2) with long-term management (for a minimum of 30 years) will achieve 5.19 Habitat Units and 0.03 Hedgerow Units. This is a total net unit change of +0.69 Habitat Units and +0.03 Hedgerow Units. This equates to a +15.26% net gain in Habitat Units.

6.40 As there are no hedgerows on site in the baseline, the metric cannot calculate a percentage net change. However, planting any quantity of hedgerow features will result in a sufficient positive net gain. The proposals for the Site do not satisfy the area habitat trading rules. This is due to the loss of the individual urban trees. As a result, the rule for medium distinctiveness habitats has not been met. This rule requires habitats to be replaced by habitats of the 'same broad habitat or a higher distinctiveness habitat

Flood Risk and Drainage

6.41 A flood consequence assessment and drainage strategy document has been prepared by Civic Engineers. This report provides a full justification as to why the proposals for the site should be deemed acceptable in relation to flood risk and drainage.

6.42 Policy DM1 of the Local Development Plan requires development proposals to *"not increase the risk of flooding but make adequate provision for sustainably dealing with foul and surface water drainage and not result in an unacceptable impact upon the water environment".*

6.43 Technical Advice Note 15 – Development, flooding and coastal erosion from Planning Policy Wales (PPW) refers to the Flood Zones shown on the NRW Flood Maps for Planning and establishes the range of uses which are appropriate for each Flood Zone, or compatible for each Flood Zone. The Site is identified as being within Flood Zone 1 for Fluvial Flood Risk, where there is less than1 in 1000 (0.1%) (plus climate change) chance of flooding in a given year. However, the NRW Flood Map Additionally shows that pockets of Flood Zone 2 and Flood Zone 3 for Flooding from Surface Water and Small Watercourses lie within the site boundary.

6.44 The proposals for the development of the site fall within the category of Less Vulnerable Development under the definition of 'General industrial, employment, commercial and retail development' and 'Transport and utilities infrastructure'. Less Vulnerable development is appropriate and acceptable in principle in Fluvial Flood Zone 1.

6.45 The Flood Consequence Assessment portion of the report has demonstrated that the proposed development is at low-to-medium, low or insignificant risk of flooding from all sources. The proposed surface water drainage strategy reduces the flood risk from surface water to the site and downstream areas by significantly reducing runoff from the site and into the public sewer.

6.46 In line with national and local guidance/policy and with the statutory SuDS standards, surface water will be managed using bioretention systems (inclusive of tree pits and raingardens), providing a significant improvement to the quality and quantity of runoff from the detailed site.

6.47 The development is not expected to have a detrimental impact on wider flood risk in the area and is anticipated to reduce flood risk within the immediate vicinity owing to the betterment on existing drainage rates targeted by the proposals. As such and taking into account all the information presented in the body of this report, it is considered that the development should be considered acceptable from a planning perspective in relation to flood risk and concerning its drainage strategy.

Heritage and Archaeology

6.48 A Heritage Statement and Desk-based Archaeological Assessment have been provided by Civic Heritage. The purpose of these reports are to advise on the heritage and archaeological designations for the site and how these could potentially be impacted by the development proposals.

6.49 Policy SP15 of the Local Development Plan, titled 'Historic and Cultural Environment', states that development will only be supported where it conserves, protects, preserves or enhances the cultural and historic assets of the County Borough and their setting. This includes listed buildings, conservation areas, scheduled monuments and archaeological remains.

6.50 The heritage impact assessment finds that the current proposals will result in Moderate, Slight and Neutral (beneficial) impacts upon the significance of the heritage assets, except for one instance of Moderate (adverse) impact on the projected route of Wat's Dyke.

6.51 The setting of Wrexham General Station is currently negatively impacted by vacant land and modern development that is in poor condition and has no functional or physical relationship to the Listed Building. The redevelopment of land opposite the station provides an opportunity to enhance the setting through the creation of public realm, landscaping and new and appropriate street furniture. Improvements to the accessibility of the station will increase communal value but should be sensitively designed to respect the historic fabric of the station in order to protect its evidential value, architectural interest and significance.

6.52 The projected line of Wat's Dyke may be directly impacted by landscaping and public realm works. Archaeological monitoring and recording will be required in order to mitigate the impact of the proposals on any surviving buried remains.

6.53 The proposed scheme will result in no change and negligible to minor visual changes within the setting of heritage assets within the study area. The high-quality design of the commercial office building and better pedestrian links to the city centre are likely to have a positive impact on the built environment within the setting of the heritage assets and the scheme includes several public benefits. Several recommendations for offsetting harm to the aforementioned heritage assets are presented within the Heritage Statement, all of which can be incorporated into the scheme through submission of further detail at reserved matters stage.

6.54 The desk-based study aimed to identify as far as possible from existing records, the nature, extent and significance of the archaeological resource within the site so that an informed decision may be made regarding the nature and scope of any further scheme of archaeological works that may be required in relation to the proposed development.

6.55 The potential for the site to contain buried archaeological remains is considered to be high. Remains may include the 19th-century Wrexham Station, the original Wrexham, Mold & Connah's Quay Railway Station and railway line (including a turntable), a steam saw mill. Any such remains that do exist within the site are likely to be of low significance. A summary of the potential and significance of the archaeological remains within the site is outlined in table 3 of the desk based study.

6.56 The PPW makes clear that where the loss of the whole or a material part of a non-designated heritage asset's significance is justified by a development, the developer should be required to record that asset and advance understanding of its significance, and to make this evidence publicly accessible. Archaeological monitoring and recording will be required in the first instance, with

archaeological evaluation potentially required to establish the presence or absence of the potential steam saw mill buildings and nursery buildings in the south-east of the Site. Further excavation may be necessary if significant archaeological remains are encountered during the monitoring and recording. This would offset the harm of the development of the buried archaeological resource, in line with the guidance provided by the Planning Policy Wales National Plan and the Local Plan. These recommendations could be secured through a condition on outline planning permission.

6.57 Overall, it is assessed that the development within the Site boundary would not have significant detrimental impacts on the setting and significance of any nearby heritage assets.

Noise Impact:

6.58 A Noise Impact Assessment has been produced by Hoare Lea to support this outline planning application. Welsh national policy Technical Advice Note 11: Air Quality, Noise and Soundscape (TAN 11) refers to assessment in line with BS 4142 where the development is to include sound of an industrial or commercial nature. It is therefore proposed that BS 4142 forms the basis of the assessment.

6.59 Policy DM1 of the Local Development Plan states that development proposals must *"safeguard the environment from the adverse effects of pollution of water, land, noise, light or air, or land instability, arising from development".*

6.60 An environmental noise survey has been carried out on site over 6 days commencing on 30 January 2025. The aim of the survey was to determine the existing sound levels around the site, with the purpose of establishing the representative background sound levels to set maximum noise egress limits for plant and machinery associated with the development.

6.61 The dominant background noise source on site was noted to be due to road traffic noise. There was occasional increased noise associated with the railway, but this did not affect the background noise which is driven by more constant noise sources

6.62 All noise generating plant and equipment associated with the development will be designed to ensure that the noise egress limits specified above are achieved. The specific attenuation measures will depend on the type and location of the plant items but typical measures to be considered include in-duct attenuation, acoustic screening or enclosures, low noise equipment, acoustic lagging, and acoustically rated louvres.

6.63 Further assessments will be required to examine the potential noise impacts from the Wrexham Lager proposals, mainly relating to the brewery operations. With the proposals currently being in outline, with limited indicative information available for these elements of the scheme, it is not possible to carry out a robust assessment. This will be required for reserved matters stage.

6.64 Based on BS 4142:2014 and national planning guidance TAN 11, all plant, equipment and machinery associated with the development shall be controlled to ensure that the overall sound pressure levels at 1 m from the façade of the nearest noise sensitive premises do not exceed 42 dB LAr,Tr during the daytime (07:00 to 23:00 hrs) and 32 dB LAr,Tr during the night (23:00 to 07:00 hrs).

6.65 It is considered that mitigation measures can be appropriately implemented to ensure that the proposed development would not have a harmful impact on the nearby noise sensitive receptors and residential properties. Further details will be provided at reserved matters stage, with appropriately

worded planning conditions able to secure provision of such further details and information as required.

Air Quality:

6.66 An Air Quality Assessment has been produced by Hoare Lea. This report assesses the potential air quality impacts associated with the proposed development, through considering existing baseline air quality conditions across, and in the vicinity of, the Site and determining its suitability for the proposed end-use. Potential sources of emissions are identified and assessed in the context of existing air quality and emission sources and the nature and location of both existing and proposed sensitive receptors, which in this case represent nearby residential properties.

6.67 Policy DM1 of the Local Development Plan states that development proposals must "*safeguard the environment from the adverse effects of pollution of water, land, noise, light or air, or land instability, arising from development".*

6.68 The baseline assessment has shown that the Application Site is not located within or near an Air Quality Management Area (AQMA). There was no exceedance of the annual mean nitrogen dioxide (NO2) Air Quality objective (AQO) measured at monitoring locations in the baseline year of 2023 within 1 km of the Application Site. There was no exceedance of the 1-hour mean NO2 AQO monitored at automatic monitoring station WCBC 1 in the baseline year pf 2023. All other pollutants were below their respective short term and long term AQOs. Additionally, 2023 Defra predicted background concentrations are below the relevant AQOs for NO2 and Particulate Matter (PM10 and PM2.5) concentrations.

6.69 The impacts of demolition and construction work on dust soiling and ambient fine particulate matter concentrations have been assessed and appropriate mitigation measures have been recommended. Provided these mitigation measures are implemented and included within a dust management plan, for example through a planning condition, the residual impacts from the construction phase are considered to be not significant.

6.70 The traffic generated by the Proposed Development has been screened against the criteria set-out in the Environmental Protection United Kingdom (EPUK) and Institute of Air Quality Management (IAQM) planning guidance to determine the need for a detailed assessment. This screening assessment has shown that the potential impact of additional road traffic on local air quality is considered insignificant and a detailed assessment is not required.

6.71 The proposed energy strategy will be all electric, utilising heat pumps at roof level, a zero-combustion emission technology. As no combustion sources are proposed for the primary energy supply, no local air quality impacts are anticipated and a detailed assessment of impacts of combustion emissions from the energy plant has been screened out of this assessment.

6.72 Further assessments will be required to examine the potential air quality impacts from the Wrexham Lager proposals, mainly relating to the brewery operations. With the proposals currently being in outline, with limited indicative information available for these elements of the scheme, it is not possible to carry out a robust assessment. This will be required for reserved matters stage.

6.73 A qualitative Site Suitability Assessment showed that pollutant concentrations are in compliance with the 1- hour mean and annual mean AQOs for NO2. Therefore, the Application Site is considered suitable for the proposed use without the inclusion mitigation measures.

6.74 It is assessed that air quality does not pose a constraint to the development of the Site for the proposed use, and the proposals meet the requirements of both national and local air quality planning policy. The Site is considered to be of good design with regard to air quality impacts, making the Site suitable for the development proposals. The scheme is considered to be in compliance with the requirements of Local Policy DM1 and the provisions of the relevant national policies and guidance.

Ground Conditions

6.75 A Phase 1 Desk Study and preliminary risk assessment has been undertaken by Civic Earth to evaluate the wider area for the Wrexham Gateway Development. The study area consists of the Site, as well as the Wrexham General Station and land to the west, and the land to north including the former Jewsons buildings. The aim of this report is to evaluate potential human health, environmental and geotechnical risks and constraints associated with the proposed development.

6.76 The preliminary qualitative risk assessment indicates there is a low to moderate risk to identified receptors from potential contaminants associated with the current and former uses of the site and surrounding area and potential Made Ground associated with former ground workings and the former development of the site. In addition, the assessment has identified a number of potential geotechnical constraints associated with the potential for below ground obstructions, variable thickness of Made Ground, aggressive ground conditions, nearby Network Rail infrastructure and ground workings within and immediately adjacent to the Site.

6.77 Based on the findings of this report, it is recommended that an intrusive ground investigation is undertaken to assess for the identified contaminants of concern, to evaluate the potential contaminant linkages through soil, leachate and groundwater sampling, and enable a remediation strategy to be developed, if required. This investigation should include laboratory analysis of soil and groundwater samples for the identified contaminants of concern and a ground gas and ground water monitoring programme to confirm the ground gas and groundwater regimes at the Site. It is also recommended that a UXO risk assessment and Coal Mining risk assessment are both undertaken to evaluate the respective risks.

6.78 The proposed scheme has provided robust evidence and documentation to demonstrate that an appropriate evaluation ground contamination or stability related risks have been undertaken at this stage, to inform further investigations and provide recommendations for the Site.

Sustainability

6.79 One of the ultimate objectives which Wrexham CBC proposed development and the wider redevelopment of the Wrexham Gateway is to create sustainable development, which achieves decarbonisation has strong environmental credentials. A sustainability statement has been produced by Cushman & Wakefield to outline how the development complies with sustainability related planning policy at the national and local levels.

6.80 Policy RE2 of the Local Plan requires developers of the Key Strategic Sites and major sites (100 dwellings or more or development exceeding 1000m2) to incorporate schemes which generate energy from renewable and low carbon technologies. This includes opportunities to minimise carbon emissions associated with the heating, cooling and power systems for new development.

6.81 Policy SP18 seeks to mitigate against the effects of climate change and adapt to its impacts, development proposals will need to demonstrate that they have taken into account reducing carbon emissions, adapting the implications of climate change at both a strategic and detailed design level, promoting efficiency and increasing the supply of renewable energy, and maintaining ecological resilience.

6.82 The Welsh Government 'Compliance with BREEAM requirements and the exception process' document outlines that for any buildings with area of 1000sqm (across all types and use classes), there is a recommendation that an assessment is undertaken to identify credits which can/must be obtained and a post construction stage assessment or BRE Certificate required.

6.83 The proposed development aims to create high-quality office space and ground-floor retail space with the premier sustainability credentials and a low carbon footprint. The new construction will look to achieve BREEAM Excellent, support the transition to sustainable sources of energy, minimise car parking, increase cyclist facilities, introduce EV charging points and support local biodiversity as part of the wider Wrexham Gateway, Eastern Zone development.

6.84 The Sustainability Statement demonstrates the best practice for the proposed development across key sustainability areas:

- Utilising the existing frame and re-using existing materials where appropriate to reduce the embodied carbon.
- Reducing operational energy and carbon in line with the energy hierarchy, adapting a fabric first strategy.
- Building an all-electric building in recognition of the net zero carbon aspiration of the project.
- Promoting sustainable transportation by reducing car parking, increasing cyclist facilities, introducing EV charging points (to existing parking spaces).
- Utilising a roof terrace to promote health and wellbeing, and biodiversity
- Limiting the risks associated with climate change, such as flooding risk through appropriate risk assessment and mitigation.
- Reducing waste generated from the construction works and subsequent operation of the project.
- Deploying responsible sourcing principles throughout the project, including the use of timber and timber-based products that are legally harvested and traded, and have FSC or PEFC certified timber, utilisation of a sustainable procurement plan and leveraging local suppliers where possible.

6.85 A MEP Engineering Report, prepared by Hoare Lea to outline the strategic design proposals for the mechanical, electrical and public health (MEP) engineering requirements for Wrexham Gateway Eastern Zone. This report evaluates what is required for the services design of the proposed commercial office building on the Site, reviewing options for heating and cooling strategy. The building will be required to comply with Building Regulations Approved Document L2A 2021 for the office areas and commercial space. The Applicant requires the office building to achieve an EPC rating of A.

6.86 This assessment has demonstrated that the proposed development will have the potential to be delivered to a BREEAM Excellent standard and relate well to the principles and aspirations of sustainable design, which will reduce energy consumption and carbon emissions for the development. The development will therefore relate well to Wrexham Local Development Plan RE2.

07 Section 106 Heads of Terms

Section 106 Requirements

7.1 Section 106 agreements are used as a form of planning obligation to overcome obstacles which may otherwise prevent planning permission from being granted. As stated in Planning Policy Wales contributions from developers may be used to offset the negative consequences of development, to help meet local needs, or to secure benefits which will make development more sustainable.

7.2 The Wrexham Infrastructure Plan is a document which sits alongside the Wrexham LDP. covers the plan period to 2028 and identifies the infrastructure required to support and sustain the County Boroughs projected level of growth. It will also support the Council's Community Infrastructure Levy (CIL) charging schedule which will be prepared in due course once the LDP has been adopted.

7.3 Wrexham County Borough Council have adopted a pragmatic approach to focusing efforts on infrastructure that could either be a potential 'show stopper' to the delivery of allocations identified in the plan or that which is essential to helping to facilitate the delivery of the allocations. The types of infrastructure covered include:

- Transport & Highways – walking and cycling networks, rail and public transport networks and the road network
- Education – nursery, primary and secondary schools, and sixth form colleges
- Health – hospitals, health centres, dentists, care for the elderly
- Environmental Management – flood risk and surface water management
- Utility Services – water, gas, electricity and telecoms

7.4 Local Plan Policy SP5 titled 'Planning Obligations' states that *"where any new development will place a strain on existing infrastructure, services, facilities or the environment, planning obligations or Section 106 agreements can be used as a means of offsetting the impact either by seeking the developer to undertake the necessary work or via a financial contribution that cannot be secured by a planning condition."*

7.5 Planning obligations will be sought where they are necessary to make the development acceptable in planning terms, directly related to the development and are fairly and reasonably related in scale and kind to the development.

Community Infrastructure Levy

7.6 Community Infrastructure Levy (CIL) CIL is a method of securing generalised contributions from developers. The Government legislated for CIL in the 2008 Planning Act. Implementing Regulations followed, and CIL came into force in England and Wales on 6 April 2010.

7.7 Wrexham Council does not currently have an adopted CIL charging schedule. The Infrastructure Plan sets out future infrastructure requirements. Further dialogue and consultation findings will help develop the detail of required infrastructure along with funding opportunities including the roles of Community Infrastructure Levy (CIL) contributions for strategic projects, Section 106 Agreement contributions for local priorities together with identifying other potential funding streams from the public and private sectors.

7.8 The policy subtext for SP5 that's that "All the allocations listed in policies SP3, SP4, SP10 and H1 will require the completion of a planning obligation, the broad requirements for which are set out in the accompanying Infrastructure Plan (IP). In addition, where the capacity of infrastructure, services, facilities or the environment will be constrained as a result of windfall development, contributions will also be sought to offset the impact of such development in line with the relevant SPG's."

7.9 Due to the lack of clear specified guidance on CIL calculation and charging, we are unable to confirm at this stage what developer contributions will likely be imposed upon the proposed development. As such, we will await for the Council's response on this matter during the determination process for the outline planning application.

7.10 It is expected that the Council will seek to impose conditions on any planning permission granted and seeks contributions through planning obligations. The proposed development, given the scale of the scheme, and the relevant planning policies set out above, is required to consider necessary planning contributions in order to render the proposals acceptable

08 Conclusion

8.1 This Planning Support Statement has shown that the proposed development is in accordance with the Wrexham LPD, and with the relevant guidance of the National Development Framework for Wales. The planning policy context establishes the commitment the Council and Welsh Government deliver sustainable growth and develop a vibrant economy.

8.2 It is recognised that, due to the recent legal challenge, the LPD does form part of the statutory development plan for Wrexham. However, the Council has confirmed that the LPD policies can be given significant material weight in decision making, with the policies considered more up to date than those within the UPD, and also sound following Examination in Public.

8.3 The Site presents an opportunity to make a significant contribution to the overarching aims of the Statutory Development Plan, delivering regeneration and significant public benefit within a key area identified within the Wrexham Town Centre Masterplan

8.4 The development proposals are demonstrated to be in an appropriate location as set out within the Statutory Development Plan, within the most sustainable settlement within the district, as defined within the settlement hierarchy. It is therefore assessed that the overarching principle of development on this Site is acceptable, and the sustainability of its location is well established.

8.5 As the proposed development is considered to be in full accordance with the Wrexham Local Development Plan, the proposal will benefit the presumption in favour of sustainable development, with the primary objective of the PPW seeking to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

8.6 Notwithstanding the above, should the Council determine that the proposed development is not fully in accordance with the Statutory Development Plan, we would assess that planning permission should be granted unless there are strong reasons for refusing the development, or there are adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies as a whole.

8.7 Overall, it has been evaluated and evidenced that any potential adverse impacts of the development would not significantly and demonstrably outweigh the identified benefits when assessed against the policies of the Statutory Development Plan as a whole. The proposal therefore benefits from the presumption in favour of sustainable development and planning application should be supported by the Local Planning Authority