

TECHNICAL NOTE

Client:	Net World Sports
Property:	Land North of Bryn Lane
Date:	September 2025
Prepared by:	H Bolton

ECOLOGY RESPONSE – WILDLIFE CORRIDOR PLANNING JUSTIFICATION

Background

On 18th August 2025 the Applicant Team met with Philip Mullineux (WCBC Planning), Emma Broad (WCBC Ecology) and Natural Resource Wales (herein referred to as NRW) to discuss Planning Application Ref: P/2023/0497. A range of ecology matters were discussed with respect to the Planning Application including a query relating to the amount of on-site ecology habitat being created via the provision of “wildlife corridors” throughout the site.

These matters were raised further to comments made by NRW within their consultation response from November 2024 (erroneously dated November 2023). This response stated:

“Our concerns are summarised as follows, with further detail provided below:...

- B) Inadequate widths of the wildlife corridors on-site along the northern boundary and through the site, insufficient detail regarding the viability and functionality of the wildlife tunnel connecting with off-site third-party land”*

Whilst additional information has been provided by TEP in respect of the viability and functionality of the Wildlife Corridor (see Appendix A within Covering Letter produced by Carter Jonas, issued alongside this note), this note specifically provides the planning and design justification for the current widths of onsite wildlife corridors and ultimately articulates why it is not practical to amend these. It builds upon the note shared with WCBC Planning Department on 22-09-2025, with key details from that incorporated into this note where relevant.

Planning Policy Position

The Wrexham Local Development Plan (LDP) was adopted in December 2023. However, a legal challenge was raised by Councillor Marc Jones as to whether that decision was sound. An appeal was decided in Councillor Jones’ favour via a Court of Appeal decision in January 2025. A note on the Council’s website states that, on 19 May 2025, the High Court quashed the Council’s decision to adopt the LDP, therefore this is no longer part of the development plan for Wrexham and is now un-adopted.

On 30 July 2025, WCBC held an Extraordinary General Meeting to and approved a motion to request that the Welsh Government formally 'un-adopts' the LDP and that "until direction to withdraw the plan is given, the significant relevant policies in the determination of planning applications are the adopted development plan (which consists of the Unitary Development Plan and Future Wales), and Planning Policy Wales, Technical Advice Notes and Welsh Government Circulars".

The previously adopted Wrexham LDP allocated the application site within Policy SP10: KSS3: Land to the north of Bryn Lane, Wrexham Industrial Estate and whilst the LDP is no longer the Development Plan for Wrexham, we consider that it is still a material consideration for the determination of Planning Applications within the County Borough. Furthermore, we consider that the evidence provided in support of the Local Plan pertaining to employment land is still valid, robust and relevant.

Policy SP10 does not stipulate any set widths and the proposals are broadly in line with its illustrative masterplan. Equally, neither Planning Policy Wales (PPW11) nor TAN 5: Nature Conservation and Planning set out any prescribed widths for ecology corridors. Instead, these promote high quality green infrastructure and ecological connectivity which is achieved through the proposals.

The explanatory text supporting the policy refers to Employment Land Review (ELR) evidence which was used to support the formation of economic growth policies within the LDP. This evidence was found to be sound by the inspector at examination and is therefore taken to be the most current and robust evidence available pertaining to employment needs within Wrexham. The SP10 explanatory text provides justification for the site's allocation.

LDP paragraph 3.70 advised that the qualitative evidence provided within the 2015 ELR [paras 10.99-10.100] indicates a growing demand for employment land. LDP paragraph 3.71 stated that evidence indicates that there is a need to allocate further land at Wrexham Industrial Estate to provide sites which can meet both the needs of existing firms and be marketed to future inward investors.

Furthermore, LDP paragraph 3.71 advised that the allocations need to be sufficiently large to meet the diverse range requirements identified, i.e. provide plots of 2-5 ha for inward investment/large business growth, smaller plots for design and build options and development land for new schemes of office and industrial units. Given such requirements the new allocation equates to 28ha in size, exclusive of ecological mitigation need, in line with the amount of land recommended by the ELR findings.

Response

During our meeting of 18th August, Emma Broad (WCBC Ecology Unit) suggested that the wildlife corridor should be increased in width to "40-50m". The Applicant's ecologist, TEP, advises that there are no formal guidelines on what an appropriate width for a wildlife corridor should be. NRW has never provided a figure.

Within the TEP Response (to be read in conjunction with this note) justification is provided to demonstrate the viability of the wildlife corridor as currently designed. In addition to this SGP have prepared a plan which clearly shows the floorspace impacts associated with increasing the widths of the ecology corridor (provided at Appendix I).

This plan shows that even increasing the corridor widths in line with the lower range from Emma Broad's comments will result in a loss of almost 180,000 sq. ft of floorspace from across the development. The corridor impacts directly on areas proposed for buildings but also yard space, internal circulation roads, and car parking, both critical components for a successful development and top of the agenda for occupiers comparing different locations. This impacts of this are considered further below:

Scheme Viability

As part of the Utopia Bid Package for Investment Zone Funding, a suite of scheme viability information has been prepared. This information, whilst not forming part of the application submission, demonstrates that whilst the

scheme is viable, scheme viability is marginal. Interestingly a significant amount of the scheme costs are fixed and associated with “up-front” infrastructure.

The loss of 180,000 sq. ft of lettable floorspace will have a significant negative impact upon the viability of the scheme and could well limit the delivery of the project, thereby jeopardising the significant socio-economic benefits associated with the scheme. As such, it is considered that accommodating wider wildlife corridors across the site is not feasible.

Marketability

As identified within the Council's own Employment Land Review, the provision of a site capable of accommodating larger units provides the unique opportunity to drive significant inward investment into Wrexham through the delivery of units to cater for national and international business occupiers that would not ordinarily be able to consider Wrexham as a viable business location.

The design response for the Utopia site has therefore sought to provide maximum flexibility for the delivery of small and medium enterprise buildings as well as much larger regional distribution centres commensurate with a strategically important employment location such as Wrexham Industrial Estate.

This has led to the design of a scheme capable of accommodating a unit of 339,617 sq. ft. as well as a unit of 469,323 sq. ft. When completed, it is expected that this scheme will deliver between 1,166 and 3,352 gross operational FTE jobs.

Whilst flexibility is key, the parameters plan sets out the maximum development parameters in terms of use, floor area, height and maximum extent of development / finished floor levels. This establishes a framework within which a range of masterplan options can be accommodated, however the ability to deliver units of genuine scale is limited by the site shape and proximity to other receptors.

Increasing the wildlife corridor widths would impact upon a range units across the site, however, as can be seen from Plan Ref: 22136-SGP-XX-ZZ-DR-A-111030 the two largest units are disproportionately impacted (resulting in a reduction in floorspace of 89,000sqft and 49,000sqft respectively).

The resultant loss of floorspace for these two units would dramatically reduce the marketability of the site more widely and would limit the potential for significant inward investment to be achieved through attracting large-scale international businesses seeking accommodation.

Furthermore, Nicholsons (the Applicant's landscape architect) considers that there is little to be gained from any further widening with their discipline in mind, noting landscape is an important part of good scheme design and therefore attractiveness to occupiers. A corridor is a linear connecting feature that forms part of a wider framework. The current width sits well with the scale and proportions of the surrounding landscape areas and there is a consistency that is both legible and works ecologically. The value of the corridor is more than its width. There are elements in the central corridor such as the existing trees and ponds, new ponds, and footpaths which all sit comfortably within the space allocated. It is a sheltered and intimate space, noting that any widening changes this character.

In terms of NRW's separate comments about shared space, the illustrative masterplan shows footpaths through the central corridor recognising its ability to serve multiple purposes. This has been a factor in establish a 38m width which is considered substantial. However, the Applicant would be willing to consider installing a modest boundary treatment around any footpaths (likely in the form of a low fence). This would be confirmed via detail provided under a planning condition and/or via a future license application.

Amenity

During the meeting on 18th August, it was suggested that the applicant team consider the potential for a full redesign of the site to accommodate larger units towards the western portion of the site and potentially lose the amenity uses located within this area of the site.

Having considered this request further, it is considered that this would be unachievable for a number of reasons. Firstly, the loss of amenity at the site would seriously detract from the overall quality of the scheme and would result in the loss of amenity provision that is much-needed for the wider benefit of the industrial estate (HGV Parking, Hotel accommodation, as well as local F&B provision). These are elements of the scheme that have been specifically identified as being necessary for the Wrexham Industrial Estate and have been welcomed by senior Councillors within WCBC.

Secondly, and more fundamentally, the removal of these uses at the front of the site would not create sufficient space to enable the re-provision of larger units resulting from wider wildlife corridors across the site.

Conclusions

As requested during the meeting on 18th August, the ability of the scheme to accommodate a 40-50m wildlife corridor buffer across the site has been considered.

For the reasons articulated within this note, we consider that it is not possible to achieve even the lower limit of this range and it would result in an inferior and less viable development proposal. As such, we do not consider it appropriate to accommodate this amendment within the scheme design and, instead, have sought to provide significant off-site ecology provision which will create high-quality viable ecological habitats that support the wider ecology network across Wrexham Industrial Estate.

Notwithstanding this, the current scheme has been designed to deliver a range of mitigation and ecological enhancement measures within the site (as shown in the illustrative masterplan and accompanying ecological submission information). This includes a central corridor of ecological enhancement within the application boundary (which, at its widest, is already c. 38m), which adjoins other open land (outside of the applicant's ownership) identified within SP10 as well as significant off-site ecology habitat. This land will link in with other strategic ecology habitat to the south to create a strategic "north-south" corridor connecting Bryn Lane with open fields to the north of the application site (in line with the strategic ambition of Policy SP10).

As such, it is considered that based upon the existing scheme design and layout, an appropriate level of on-site mitigation has been provided, which balances the on-site ecology needs of the site against other design considerations (including the creation of a well-designed commercial scheme on a nationally important employment area, that creates between 1,166 and 3,352 gross operational FTE jobs) and ensures that areas of ecological enhancement are not isolated and are strategically linked into land to the south to create a corridor that supports the ambitions of the DECCA Framework. Furthermore, significant off-site wildlife corridors have been created which, in combination with on-site provision, will deliver a net improvement for biodiversity across the Wrexham Industrial Estate.

On this basis, it is considered that the applicant has sought to comply with the stepwise approach as far as is possible, given other site requirements, opportunities and constraints and that the design response is in line with Local and National Planning Policy.

Appendix I

Plan Ref: 22136-SGP-XX-ZZ-DR-A-111030



Masterplan with 40m Landscape Overlay
1 : 1250

Property Schedule		
Name		Area
Third Party Land		3.2 hectare
Retained Hedgerows		0.6 hectare
Green Corridor		5.8 hectare



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Wrexham
Bryn Lane

Drawing Name:
Masterplan - 40m Landscape Overlay

Drawing Stage: PLANNING

Status: S2

SCP File Ref: 22136-SGP-ZZ-ZZ-A0-A-000005

22-136 06/09/20 MW MMS 1:1250 @ A0 P01

SGP Project No. Date Drawn Text Scale Rev

Drawing Number: 22136-SGP-XX-ZZ-DR-A-111030

Project Code: Program Name: Issue: Date: Author

