

# Dŵr Cymru Welsh Water – Five Fords WwTW Blower Container Building

## Planning Statement

24 June 2021

# 1 Introduction

## 1.1 Background

This Planning Statement has been prepared by Dŵr Cymru Welsh Water (DCWW) to support an application pursuant of full planning permission submitted to Wrexham County Borough Council, herein referred to as the LPA. This proposed development is described as:

*‘Installation of a building and ancillary development to contain plant and machinery appurtenant to Welsh Water statutory undertakings’.*

The Application site is situated within the existing DCWW Five Fords wastewater treatment works (WwTW) (Easting: 336305 and Northing 348208). The application site is situated approximately 3.8km south east of Wrexham town centre, on Cefn Road.

The site constitutes ‘Operational Land’ as defined under Sections 263 and 264 of the Town and Country Planning Act 1990. The proposed development would require the installation of a large building structure in which DCWW seek to house existing plant and machinery which would, by virtue of the scale and nature of the building, exceed the limitations of the ‘any other development’, as defined under Part 16 Class A (e) of the Town and Country Planning (General Permitted Development) Order 1995. As such, an application pursuant of full planning permission has been submitted under Planning Portal reference PP-09972433. Please refer to the accompanying information appurtenant to this application for further details.

## 1.2 Statement Structure

This statement outlines the context within which the application has been submitted, rationale for the proposed works, detailed assessment of the considerations appurtenant to the development and justification for consent being granted.

The statement is structured as follows:

- Section 2 of this report provides a description of the location and surrounding area/land uses;
- Section 3 provides a detailed description of the development and rationale for the proposed works;
- Section 4 reviews the relevant national and local planning policies relating to the application;
- Section 5 considers the key planning issues relevant to the proposed development; and,
- Section 6 provides a summary conclusion.

## 2 Application Background

### 2.1 Site Location, Description and Surrounding Land Uses

The Five Fords WwTW is situated approximately 3.8km south east of Wrexham town centre and 2.6km south west of the Wrexham Industrial Estate. Figure 1 below illustrates the site location, relative to surrounding land uses. The application site is situated at Easting: 336305 and Northing: 348208.



The application site extends to an areas of approximately 30m2 and is situated within the existing Five Fords WwTW. The WwTW constitutes 'Operational Land' under Sections 263 and 264 of the Town and Country Planning Act 1990 and is extensively used for sewerage undertakings, in keeping the Applicants role as a statutory sewerage undertaker. The immediate application site is characterised by sewerage undertakings with no discernible landscape character or green infrastructure features of note. The site evidences existing hardstanding in which plant and machinery is currently provided upon.

## 3 Proposed Development

The proposed development seeks to provide a building with ancillary functions to contain plant and machinery appurtenant to Welsh Waters statutory undertakings on operational land at the Five Fords WwTW.

### 3.1 Rationale/Need for Development

The proposed development is required to house plant and machinery appurtenant to Welsh Waters sewerage undertakings. The containment building would shelter two new blowers from adverse weather and provide further acoustic insulation within the operational site. Containment buildings are required to provide further protection of plant which would increase the operational lifespan of necessary infrastructure upgrades.

By virtue that the application site constitutes 'Operational Land', as defined under Section 264 of the Town and Country Planning Act 1990, plant and machinery would be provided on site under Part 16 Class A(e) of the Town and Country Planning (General Permitted Development) Order 1995 (the GPDO) and does not form part of this application. Works proposed under this application seek to provide weather proof containment for 'plant' permissible under the GPDO.

### 3.2 Design

The proposed development would comprise the construction of one containment building to accommodate blowers appurtenant to Welsh Water operations on Operational Land at Five Ford WwTW. The proposed building would measure 7.4m in width and 3.2m in depth and demonstrate a mono-pitch roof extending to 3.0m and 3.2m to the eaves and ridge respectively. At the front elevation, the proposed development would include 2no. 2.5m roller door openings with an additional personal entrance at each side elevation.

The proposed development would benefit from a steel frame and cladding, designed to be in keeping with the industrial/practical nature of the wider WwTW. The proposed development would be situated upon existing hardstanding and would not result in a net-increase in impermeable surfaces or loss of grass/shrubland within the site.

## 4 National Policy Framework

### 4.1 National Policy

To the extent that development plan policies are material to an application for planning permission a decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise, as provisioned for by Section 38(6) of the Planning and Compulsory Purchase Act 2004.

With the scale of development and scope of impacts in mind it is considered the development plan is sufficient to determine the application without the need to refer to national policy or guidance.

### 4.2 Local Policy

In this case the application should be determined in accordance with the Wrexham County Borough Unitary Development Plan (UDP) 1996-2011, adopted by the LPA in February 2005. An updated Local Development Plan is currently undergoing consultation, however, has not been formally adopted.

There are no designations associated with the application site. Due to the small-scale nature of development and surrounding nature of the WwTW, it is considered that the proposed development would not impact/or be impacted by neighbouring allocations or extant planning permissions.

#### 4.2.1 Wrexham County Borough Council Unitary Development Plan (1996-2011)

**Policy PS2** – Development must not be materially or detrimentally impact countryside, landscape/townscape character, open space, or the quality of the natural environment.

**Policy PS3** - Development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land, wherever possible, particularly so where greenfield land is of ecological, landscape or amenity value, or comprises agricultural land of grades 1, 2 or 3a quality.

**Policy PS11** - Encouragement will be given to proposals which improve the biodiversity value of sites and to the establishment of local nature reserves where the nature conservation and landscape interest of the land will be protected and enhanced.

**Policy GDP1** – All new development should ensure that building development in its scale, design and layout, and in its use of materials accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.

**Policy EC2** – Development on agricultural land of grades 1, 2 or 3a will only be permitted if it does not lead to the irreversible loss of that land.

**Policy EC4** – Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape. Development which results in the loss or significant damage to valuable trees, important hedgerows or ancient woodland sites will not be permitted.

**Policy EC6** - Development either within or close to sites of biodiversity interest will only be permitted where it can be clearly demonstrated that the need for the development outweighs the need to safeguard the intrinsic nature conservation value of the site. Where such development is permitted, damage should be kept to a minimum, and compensatory measures should be provided. Measures to improve the biodiversity value of sites and enhance their natural conservation interest and landscape quality including the establishment of local nature reserves, will be supported.

**Policy EC12** – Development (including the raising of land) within defined flood plains will only be permitted if it: a.) would not be subject to an unacceptable risk of flooding on-site; and/or b.) does not result in an unacceptable risk of flooding on or off-site; and/or c.) does not adversely affect flood management or maintenance schemes.

**Policy EC13** - Development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted.

## 5 Scheme Appraisal

Key issues to consider in the determination of the application, in accordance with the identified planning policy framework include:

- Is the development acceptable in terms of land use?
- How does the proposed development impact the character and setting of the application site?
- Would the proposed development impact upon the highways network?
- Are there any biodiversity impacts associated with the proposed development?
- Would the proposed development impact upon local flooding and drainage?

### 5.1 Principle of Development

As outlined in this Planning Statement, the application site sits within the wider Five Fords WwTW site and therefore the principle of waste water undertakings on the site is well-established and accepted. The proposed development would be provided to house essential plant and machinery appurtenant to the operations of Welsh Water as a Statutory Undertaker which would be delivered under Part 16 Class A(e) of the GPDO. Due to the small-scale nature of development, it is not considered that the works would materially impact the intensity of sewerage undertakings on site and would serve to maintain the existing operations. As such, the proposed development is considered to be acceptable in land use terms, by virtue of the existing operational site.

### 5.2 Design and Character

As stated, the application site is situated within the existing Five Fords WwTW site, an operational site utilised by Welsh Water for their sewerage undertakings. The site demonstrated minimal discernible character and primarily relates to foul water treatment apparatus, kiosks, buildings and internal road layouts. The proposed development would constitute the construction of a containment building to accommodate plant and machinery. The proposed works would measure 7.4m in width and 3.2m in depth, providing a cumulative gross internal area of 23.7m<sup>2</sup>. The development would provide a mono-pitch roof extending to 3.0m to the eaves and 3.2m to the ridge, resulting in an approximate internal volume of 72m<sup>3</sup>. Two roller doors would be provided at the front elevation and two personal doors at the side elevations with the building constructed of steel and metal cladding.

It is considered that the proposed development would be of a scale and massing which is appropriate to the location/setting. The development would be provided in the same location as existing plant and machinery and therefore would not serve to encroach upon unbuilt land, thus not intensifying the existing operational aesthetic. It is considered that the proposed development would be of a scale, size and character which is entirely in keeping with the existing Five Fords WwTW site and would be visually subservient to existing plant and machinery within the immediate context. Notwithstanding the above assessment, the application site is situated within the wider WwTW and is not visible from the public realm due to a large degree of separation from the operational site boundary. As such, it is considered that the development would give rise to negligible impact on the design and character of the wider treatment works and the surrounding area. By virtue of the above assessment and the small-scale nature of development, the proposed works are considered to accord with policies PS2 and GDP1 of the UDP.

### 5.3 Highways and Accessibility

The proposed development would be sited within the existing WwTW site which prevents public access (pedestrian and vehicle). By virtue that the proposed works are required to contain existing plant and machinery from the elements, there would be no significant increase in vehicle movements associated with the scheme. As such, it is considered that there would be an inconsequential impact on the local road network and vehicle numbers accessing Cefn Road to the north of the site. The proposed works would be suitably sited approximately 500m south west of the Cefn Road junction and would therefore not place a high degree of cognitive demand of drivers attention and would therefore safeguard existing highway safety. As such, the proposed development would be acceptable in terms of highway safety and accessibility.

### 5.4 Biodiversity & Ecology

The proposed development would be provided upon existing hardstanding and therefore would not necessitate the loss of undeveloped land or arboricultural assets. The site demonstrates no discernible biodiversity and therefore the erection of a metal clad containment building to house existing plant and machinery would give rise to an inconsequential impact on existing green assets. As such, it is considered that the proposed development would not adversely impact existing trees, hedgerows or agricultural land and therefore would accord with policies EC2 and EC3 of the Wrexham UDP.

### 5.5 Flooding and Drainage

The proposed development would constitute a gross internal area of 23.7m<sup>2</sup> upon existing hardstanding. By virtue that the existing site benefits from hardstanding with plant and machinery, the development would not result in a net-increase in impermeable surfaces on site. As such, the proposed works would neither mitigate or exacerbate surface drainage on site, resulting in an inconsequential impact on flooding and drainage. Due to the existing site context and small-scale nature of development, it is considered that the proposed development is acceptable. As such, it is considered that the proposed development would not give rise to an adverse impact on flood risks or result in adverse impacts on surface runoff due to an inconsequential impact on impermeable surfaces, thus according with policies EC12 and EC13 of the Wrexham UDP.

### 5.6 Conclusion

Based on the existing site context and nature of development, it is considered that the principle of development is well-established and the design is informed by the operational nature of the WwTW site. Notwithstanding the informed design principles, the proposed works would result in inconsequential highways, biodiversity and flooding impacts which would be acceptable. Based on the above assessments, it is considered that the proposed development is acceptable.

## 6 Conclusion

An application pursuant of full planning permission has been submitted to Wrexham County Borough Council for the proposed construction of containment building appurtenant to their statutory sewerage undertakings. The development is considered to be of a small-scale nature and situated upon operational land, thus evidencing the acceptability of the principle land use. The site is characterised by existing plant and machinery relating to the existing undertakings and therefore the provision of a containment building is considered to be in keeping and sympathetic to the existing aesthetic and character of the site. Notwithstanding the above assessment, the proposed development would be sited in the centre of the site, 500m south west of Cefn Road and therefore is not visible from the public realm. Due to the small-scale nature of the works and existing plant and machinery with hardstanding on the site, it is considered that the proposals would not give rise to any highways, biodiversity/ecology or flooding impacts in which would warrant a recommendation for refusal.

Based on the information provided in this Planning Statement and submission pack, the Applicant considered that the benefits of the proposed development weigh heavily in the determination of this application. It is therefore considered that full planning permission should be granted.