PLANNING, DESIGN AND ACCESS STATEMENT.

CHANGE OF USE FROM STORAGE AND DISTRIBUTION TO SUI GENERIS USE WASTE RECYCLING OPERATION AT REDWITHER BUSINESS PARK, FIRST AVENUE, WREXHAM, LL13 9XP.

The application relates to use of the site for storage and shredding of waste electrical and electronic equipment (WEEE) for onward dispatch to domestic and international markets for recycling.

Relevant planning history

The site is located within the well-established Redwither Business Park in Wrexham. The previous use was a warehouse under B8 Storage and Distribution Use. Demolition of an existing building and extension to warehouse and alterations was granted in June 2015 (ref. P/2015/0177) and was implemented.

The Proposal.

The applicants wish to use the site for storage/shredding of waste electrical and electronic equipment (WEEE) for onward dispatch to domestic and international markets for recycling. Activities carried out by Telecycle Ltd consist of sorting, separation and manual dismantling of WEE into different components.

Most waste streams would be shredded in dedicated equipment for size reduction. Components to be shredded include the following:

- Solar panel film
- Copper wire
- Modems
- PCs
- Power supplies
- Power boards
- Small domestic appliances

To service the proposed shredding equipment a new 1000 kVa power supply is scheduled to be installed in addition to a new substation. Waste treatment is proposed to be followed by bulking of the final products prior to dispatch. Material is proposed to be stored both loose and palletised prior to dispatch to domestic markets and those overseas.

One area of the site is proposed to serve as the container loading point, whilst external areas are earmarked for continued use of trailer parking, loading and unloading. Other external areas are likely to be utilised for storage of loose metals in concrete bays ready for export loading. This area is currently used as trailer parking.

The applicants will use the full extent of the warehouse, including the extension, ground floor and first floor offices, and external areas, totalling 3,749 m2.

The site can be separated into three areas:

Warehouse 1 (1,096 m2) is located in the original building. This would be the main area for waste treatment, both shredding and manual dismantling,

Warehouse 2 (1,200 m2) is the extension built in 2015. This would be used storage of prepared waste materials as well as container loading point.

External Yard: the canopied area would remain designated for trailer parking, loading and unloading.

The rest of the outdoor area may be used to store loose metals in bays. All waste treatment would be carried out indoors, with external operations limited to storage of trailers and metal.

Initially operating hours are likely to be 8 hours per day, with a view to expanding to 16 hours on weekdays in two eight-hour shifts. There would be up to 12 staff employed on site when the site is fully operational.

It is accepted that the use of the site would be changed to sui generis in order to accommodate the waste management facility.

Planning Policies

National Policy

Planning Policy Wales 12 (2024)

Future Wales – The National Plan

Towards Zero Waste (2010)

TAN5: Nature Conservation and Planning

TAN12: Design

TAN18: Transport

TAN21: Waste

TAN23: Economic Development

Planning Policy Wales 12 (PPW)

Planning Policy Wales

PPW explains in para 5.13.4 that the Welsh Governments policy for waste management is contained in Towards Zero Waste, Beyond Recycling. It states that 'Planning authorities should, in principle, be supportive of facilities which fit with the aspirations of these documents and in doing so reflect the priority order of the waste hierarchy as far as possible'. The Waste hierarchy from top to bottom is:

• Prevention and reuse

• Preparation for reuse

• Recycling

• Other recovery

• Disposal

Welsh Government states in para 5.13.5 'The waste hierarchy provides the key starting point for all types of waste management proposals. However, consideration of the hierarchy should be set against the wider social, economic, environmental and cultural factors which are relevant in any given case'.

Para 5.3.12 states 'For all wastes, suitable locations for sustainable waste management development should be identified in development plans as well as criteria by which applications for such developments will be determined, recognising that the most appropriate locations will be those with the least adverse impact on the local population and the environment and with the best potential to contribute to a broad infrastructure framework'.

Well-being Future Generations Act

On 29th April 2015, the Welsh government signed into law the Well-being of Future Generations

(Wales) Act. This legislation aims to improve the economic, social, environmental and cultural wellbeing of Wales by strengthening institutional governance structures in accordance with Wales

'Sustainable Development Framework.' The legislation places a duty on public bodies to implement sustainable development by incorporating seven well-being goals into their work, as well as outlining the establishment of a Future Generations Commissioner and providing for a range of national indicators.

Of particular relevance to this proposed development are the wellbeing goals of:

- A prosperous Wales "**An innovative, productive and low carbon society which recognises the**

limits of the global environment and therefore uses resources efficiently and proportionately

(including acting on climate change); and which develops a skilled and well-educated

population in **an economy which generates wealth and provides employment opportunities**,

allowing people to take advantage of the wealth generated through securing decent work."

Whilst the proposed development is not an allocated site within the extant development plan the use is considered to be in keeping with the provisions of the PPW documentation and the Sustainable Development Framework being a recycling use in an appropriate building on a designated and long standing industrial estate with good facilities and transport links.

The proposed development will occupy a building, whose former use has been relocated within the Wrexham Redwither Industrial Estate, to more modern and suitable building for the haulage operation, therefore those jobs have been retained and more created by the proposed development.

Thus, the viability and effectiveness of the industrial estate is maintained and enhanced.

TAN 21: Waste (2014) provides detailed guidance on waste planning and is supported by the Collections Infrastructure Market Sector Plan.

TAN 21 advises (section 2) that the contribution of such proposals to the objectives and principles set out in WG Towards Zero Waste (2010) should be taken into account when considering applications for waste management facilities. Towards Zero Waste (2010) sets ambitious targets for waste reduction, recycling, and recovery, aiming for zero waste by 2050**. The strategy emphasizes the need for facilities that can process waste closer to its source, reducing transport emissions and promoting local recycling markets. It further indicates that the aim is to ensure that the right facilities are located in the right place to meet environmental, economic and social needs.**

The proposed development fully complies with the provisions of TAN 21 and the targets set by Towards Zero Waste. The recycling and recovery elements are firmly in keeping with the strategy and are central to the development proposed.

The collection and recycling of WEEE has been one of the great improvements in waste management over recent years. The application proposal feeds into these improvements which deals with a resource which was poorly handled in the past.

In addition, the proposed use will utilise a building which is one of the original built forms on the estate in way that is completely in keeping with its use given its structure and servicing areas.

The character and appearance of the building will be retained whilst a valuable resource is recycled for future uses.

Local Planning Policy

The Unitary Development Plan (UDP) 1996 – 2011 was adopted by Wrexham County Borough

Council on the 14th February 2005.

On the current understood position of the LDP, where relevant, a comparison with the UDP relevant policy has been explored and analysis provided.

The emerging Local Development Plan contains policies of relevance:

Policy SP2: Location of Development

Policy SP8: Economic Growth, Employment and Enterprise

Policy SP9: Wrexham Industrial Estate

Policy SP14: Natural Environment

Policy SP17: Sustainable Waste Management

The following policies are also applicable, however, the related issues are covered in other policy responses/reports attached to this document.

Policy SP18: Climate Change

Policy SP19: Green Infrastructure

Policy EM1: Protection of Existing Employment Land

Policy EM2: Provision of Supporting Facilities for Employees in Business, Industrial and Warehousing Developments

Policy NE6: Waste Water Treatment and River Water Quality

Policy DM1: Development Management Considerations

Policy MW6: Waste Management Facilities

Policy T1: Managing Transport Impacts

LDP Policy SP2: Location of Development

The policy directs the location of development and requires 'new development is directed to thedefined settlement limits and employment areas as identified on the Proposals Map'. The location of the proposal is within an area outlined as an 'Employment Area'.

The Wrexham Industrial Estate is an established industrial area which is home to a wide variety of industrial and commercial uses. Large industrial uses include Kelloggs, JCB, Hydro Aluminium etc along with local, large industrial users such as ASH Waste and Village Bakery.

The proposed use is an industrial use and fully in keeping with the ethos and uses in the locality.

LDP Policy SP8: Economic Growth, Employment and Enterprise

The policy supports economic growth, employment and enterprise and states the objective of 'providing a level of growth which allows opportunities to deliver approximately 4200 jobs in the County Borough over the Plan period across a wide range of employment sectors'.

It is considered that this application supports this aim by providing up to 12 staff when the site is fully operational on a site that was otherwise redundant.

LDP Policy SP9: Wrexham Industrial Estate

The site is located within Wrexham Industrial Estate as shown on the proposals map is the County Borough's Key Business Sector Area and this area's primary focus is for new employment development over the plan period for class B1, B2 and B8 employment.

Development that would lead to the loss of existing B1, B2 and B8 employment sites on designated land will not be permitted. The proposal relates to a sui generis use and, therefore, technically the proposal would result in the loss of B1, B2 and B8 land. The applicant will create jobs on site provided directly by the proposal and multiplier employment opportunities developing as a consequence including haulage, maintenance and servicing.

The previous occupier, McCarthy Haulage, is moving to another, more suitable site within Wrexham Ind. Estate therefore those jobs will also be retained. The application proposal will create new jobs for a use that is similar to a B2 use and therefore in keeping with the character, uses and appearance of the Industrial Estate.

LDP Policy SP14: Natural Environment

Wrexham Industrial Estate, is undergoing initiatives to become a more ecologically sound and wildlife friendly environment. This includes projects in relation to habitat creation and enhancement, creation of wildlife corridors to enhance biodiversity. Efforts are also focused on creating new habitats and relocating existing species, such as newts, to promote a more diverse and resilient ecosystem. It is considered that this proposal could contribute to those aspirations.

National policy (Future Wales, Policy 9, and PPW 12, paragraphs 6.2 and 6.4) and local policy (LDP Policies SP14, SP19 and NE3) require proposals to include a Green Infrastructure Statement (GIS) to demonstrate a Net Biodiversity Benefit (NBB) and safeguard ecological features on the site and those associated with it. Therefore, the applicant will need to provide the above to ensure the proposal is compliant with these policy considerations.

The Ecology Report attached to the application submission concludes,

"Constraints And Recommendations The proposed development will strictly be the acquisition of the building and change of use to a waste site for electrical goods, resulting in less traffic. Therefore, given the ecologically important features on site are to remain and the site is to remain unchanged, there are no ecological constraints. It is recommended that faunal enhancements be implemented to boost the biodiversity of the site, with some scope for additions along the boundaries being possible. Ecological Enhancements These ecological enhancements could include; • Installation of bat boxes on retained trees or new buildings.

- Bird nesting boxes.
- Hedgehog highways and hibernacula.
- Amphibian hibernacula (e.g. log piles) in the ecological enhancement area.
- Invertebrate features such as insect hotels and bee bricks."

LDP Policy SP17: Sustainable Waste Management

Although there are consistencies with various industrial uses, the proposed use is considered consistent with elements of Use Classes B1, B2 though would be classified within its unique classification – Sui generis. On this basis, the proposal is considered against policies SP17 and MW6.

Broadly the proposal for waste recovery complies with SP17 in contributing to a range of sites suitable for waste management and moving waste up the waste hierarchy.

In relation to the Waste Hierarchy, the application supports the principles set out in Planning Policy Wales (Edition 12), specifically in regard to sustainable waste management facilities. The facility supports the aspirations to move material up the waste hierarchy. The proposal will involve both recycling and preparation for reuse, ensuring that component fractions of end of life electrical and electronic equipment e.g. metals are recycled, or where economically viable that the items are prepared for reuse either as whole items or spare parts.

Annex A (the Waste Framework Directive (WFD) Compliance Matrix) of Technical Advice Note 21 Waste sets out how requirements of the WFD are met through planning policy. Article 4 (waste hierarchy) of the WFD is a central pier to informing decisions on waste management options. As described above, and also in accordance with Article 16 of the WFD, the proposal creates a facility that provides producers of electrical and electronic waste with an option to move their waste further up the hierarchy. It also contributes to providing an adequate network of facilities to deal with this specific waste stream. Given the niche nature of the waste stream sufficient volume of material is required to support the investment required to install machinery that can extract valuable resource.

The current Unitary Development Plan (UDP) 1996 – 2011 Policy MW12 requires that waste management facilities are located having regard to the waste hierarchy, and will be permitted within sites on general industrial estates.

Policy and strategy alignment

Regional monitoring in North Wales highlights the continuing need for strategic waste management capacity and robust evidence of performance. Recent reports stress that facilities must demonstrate long-term value and align with Welsh Government priorities (Interim Progress Report: Waste Planning Monitoring – North Wales).

The Collections, Infrastructure and Markets (CIM) Sector Plan provides the starting point for identifying future capacity needs. It presents data on waste arisings in Wales, broken down by material type and source, and informs assessments of additional infrastructure requirements.

The proposed facility supports these aims by:
• Providing additional treatment capacity for WEEE.
• Supporting regional self-sufficiency while enabling appropriate cross-border flows.
• Meeting the principles of TAN 21, including the waste hierarchy, proximity, and self-sufficiency (TAN 21: Waste).

Cross-border waste management

Consideration	**Evidence / Response**
Policy basis	TAN 21 allows regionally or nationally significant facilities where they deliver better environmental outcomes and support proximity and self-sufficiency (GOV.WALES).
Why cross-border?	The facility provides specialist WEEE processing with downstream offtake to high-quality refineries. Inputs from nearby English counties improve capture rates, quality of output, and overall economics compared with long-haul transport or export.

Consideration	Evidence / Response
Impact on Wales' self-sufficiency	Accepting inputs from outside Wales will not displace Welsh arisings. Installed capacity will prioritise regional contracts and strengthen Wales' recycling performance.
Transport / Carbon	Short cross-border hauls to Wrexham are materially lower than exporting unprocessed WEEE. This provides a net carbon benefit by reducing transport distances and maximising recovery.
Market context	The UK met its 2023 WEEE collection targets for the first time since 2016, showing high demand for compliant treatment. Demand remains particularly strong for small mixed WEEE and PV categories (ERP Sustainability Report 2023).

Sustainability

Performance at the company's Deeside facility over the past 12–24 months demonstrates both the reliability of supply and the clear need for increased treatment capacity.

LDP Policy DM1: Development Management Considerations

The relevant stipulations of Policy DM1 would apply to all of the components of the proposal, should an application be submitted. Policy DM1 requires that:

Development proposals, where relevant, must:

i. Accord with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/ townscape in terms of their siting, layout, scale, height, design, density, use of materials and landscaping;

ii. Not have an unacceptable effect on the amenity of the occupiers of nearby properties/land; and provide a satisfactory standard of amenity for the occupiers/users of the development itself;

iii. Safeguard the environment from the adverse effects of pollution of water, land, noise, light or air, land instability, arising from development;

iv. Take account of personal and community safety and security in their design and layout;

v. Prioritise walking, cycling and public transport use ahead of travel by car;

vi. Not give rise to highway safety, pedestrian safety or parking problems on site or in the locality;

vii. Contribute to low carbon communities through energy efficiency, be designed to minimise the use of non-renewable energy, water and the production of waste both during construction and when in use;

viii. 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;

ix. On sites which have previously been developed, new development proposals should make use of existing suitable building materials wherever possible for appropriate uses in order to re-use recyclable materials and reduce the amount of imported materials;

As previously stated, and in relation to the above policy, as the development is a change of use application and no external changes to the building are proposed, the character and appearance of the site will not change and remain in keeping with area as a whole in line with the provisions of the policy.

The environment will be safeguarded from adverse effects of pollution in line with the reports on noise, ecology etc submitted with the application.

Walking, cycling and public transport provisions are noted in the application. Whilst walking from residential areas may be not straightforward given the location of the Industrial Estate, cycle storage is provided and local bus services are available within 200 metres of the site.

Highway safety issues, as also identified in policy DM1, are not thought to be of concern given pedestrian safety is confirmed with access to public walkways throughout the estate, estate parking areas are located close to the application site in addition to the on site provision. These provisions served the previous haulage use, with greater staff requirements, more than adequately.

The application has been assessed in accordance with the relevant requirements of Policy DM1 and GDP1 of the UDP which requires:

All new development should:-

a) Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.

As stated previously, the site is remaining much as it was previously with the characterful building fully retained and unaltered.

d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.

e) Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible.

Both elements d and e are dealt with in previous texts with public transport access available within close proximity of the site.

f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.

The drainage and noise assessments attached to this submission cover the elements within this policy and no detriment is caused with either issue. It is clear from the reports that there is a much reduced drainage flow and the noise assessment identifies that the sound emanating from the site to be low impact.

h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.

The attached ecology report details the provisions provided to secure ecological gains within the site.

k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.

Waste recycling is very important both economically and environmentally. Job provision helps maintain social well being whilst the recycling element

Noise impacts are an important issue and clearly outlined in the attached noise report.

The process would include shredding of end of life electrical equipment. This activity has the potential to result in elevated noise levels. The intention is to confine such activities to the inside of a building and the provisions of the noise assessment indicate that such a use is acceptable within the building.

LDP Policy NE6: Waste Water Treatment and River Water Quality

The drainage hierarchy should be considered with the first presumption being connection to the public sewer system. If the development proposes an alternative method of drainage, you are advised to have regard to the Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation. Upon receipt of a planning application, Natural Resources Wales will be consulted and their views invited on the proposed drainage method.

This accords with UDP Policy EC13 which requires: Development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted.

LDP Policy MW6: Waste Management Facilities

Further detailed development management considerations are contained within policy MW6. This policy generally supports waste management uses on existing sites with B2 uses subject to satisfying the criteria set out in the third part of the policy. It is clear that the previous use was B8. There has been an established industrial use on this site for many years. It is considered that the proposal satisfies Policy MW6 (as the site constitutes an existing employment site in the industrial estate).

LDP Policy T1: Managing Transport Impacts

The submitted Highways report covers the issues identified in Policy T1 with traffic movements reduced, a reduction in employees, safe and sustainable access is retained, and parking/turning areas appropriate for the development.

Comparison with Unitary Development Plan:

Policies PS1, PS2 PS3, PS4, of the UDP accords with the same principles and requires:

Policy PS1 New development for housing, employment, and community services will be directed to within defined settlement limits/employment areas. The proposed use is an employment site and a defined industrial use will be retained.

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

The proposed use will retain the characterful building as it is with no external changes required. The building reflects its time of building and is to be kept as is.

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.

The site is a brownfield site in line with the provisions of the above policy.

Policy PS4 Development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car.

The existing settlement pattern and is being retained as the application is for a change of use only. The site is well served by public transport being within 200 metres of the nearest bus stops which provides access to Wrexham and beyond.

Design and Access.

The application site is a classical building probably dating from around the late 1930s. The external materials of construction are of their time and reflect the good quality available at the time. More modern additions have been added as the uses of the building have changed over time.

The proposed use will not alter the external elevations and the character and appearance of the building will remain.

Internally there will also be only limited, minor changes with the vast majority of the internal structure remaining in situ.

In terms of access arrangements this element has been covered in the Highways Report. The reduction in traffic generation and the re-use of the access facilities indicate that the situation will not be detrimental to any interests of acknowledged importance.

Conclusion.

From the documents and reports submitted with the application it can be seen that the proposed development is compatible with the site location, the uses within the industrial estate and in compliance with the national and local planning policies of the area.

The proposal will occupy an existing industrial site with no changes to the building, will operate in a manner appropriate for its location, provide a valuable economic and environmental service, create jobs and produce numerous environmental benefits for the area.

As such the applicants consider that planning approval should be granted for this development.