

REPORT

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Land North of Bryn Lane

P/2023/0497 Tree Officer Response

Net World Sports

Monday, 16 February 2026

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CONTENTS

INTRODUCTION	5
1. POLICY CONTEXT	6
Planning Policy Wales (Edition 12) Tree Loss & Stepwise	6
Technical Advice Note 23 (2014)	7
2. TECHNICAL RESPONSE	8
PPW 12 Response	8
TAN 23 Response	9
3. CONCLUSION	14
APPENDICES	15
A Map of Wrexham Industrial Estate	15

INTRODUCTION

1. It is our understanding that there have been potential concerns raised by the Tree Officer at Wrexham County Borough Council (WCBC) surrounding the lack of trees proposed for planting within the hard standing landscaped areas of the development site.
2. This note responds to those comments and articulates the proposed ecology and planting mitigation strategy for the scheme.
3. It seeks to articulate the design approach in line with PPW12 and the “Stepwise” approach and seeks to justify the rationale for the scheme in line with TAN 23.

1. POLICY CONTEXT

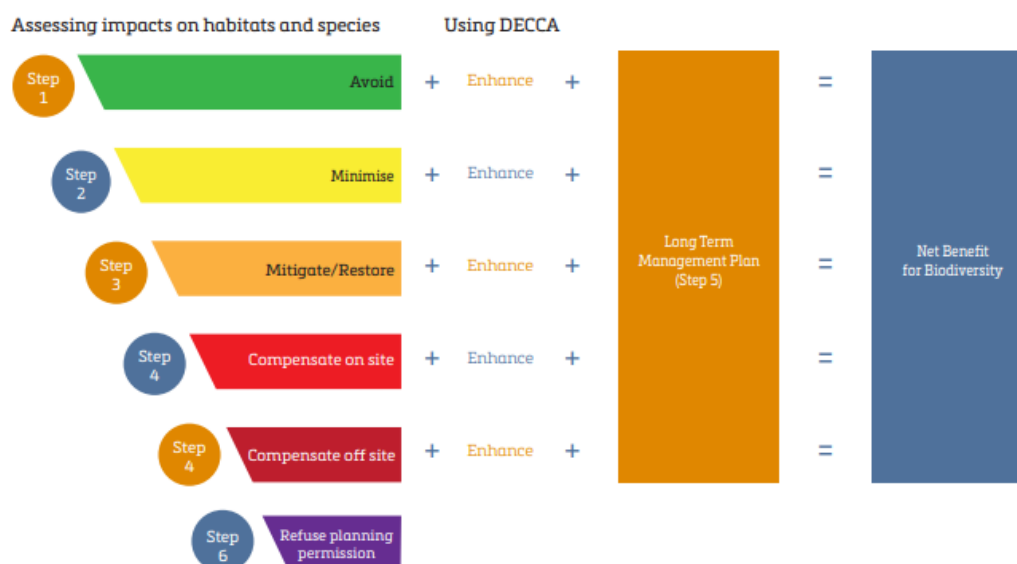
Planning Policy Wales (Edition 12) Tree Loss & Stepwise

- 1.1 PPW 12 (along with Future Wales: The National Plan 2024) sets the national planning framework for Wales, establishing (between them) the national spatial strategy for growth and setting out primary national land use and development management policies.
- 1.2 PPW 12 establishes 5 key Planning Principles for the planning system. These are:
 - a. Growing the economy in a sustainable manner
 - b. Making best use of resources
 - c. Facilitating accessible and healthy environments
 - d. Creating and sustaining communities
 - e. Maximising environmental protection and limiting environmental impact
- 1.3 PPW12 promotes the goals of the well-being of Futures Generations Act which seeks to promote: prosperity, economic resilience, health, equality, cultural vibrancy and global responsibility.
- 1.4 PPW12 fully recognises and supports the necessity to ensure that sufficient employment land is delivered “to meet the needs and requirements of a range of future employment scenarios” and advises that wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration.
- 1.5 However, PPW also recognises the role that distinctive and natural places plays in delivering sustainable placemaking outcomes.
- 1.6 With regard to the loss of trees, woodland and hedgerows, PPW states that this will only be permitted where it would achieve significant and clearly defined public benefits (as identified within TAN 23).
- 1.7 PPW advises that where individual or groups of trees and hedgerows are removed as part of a proposed scheme, planning authorities must first follow the step-wise approach as set out in paragraph 6.4.15 (detailed below). Where loss is unavoidable PPW states that developers will be required to provide compensatory planting (which is proportionate to the proposed loss as identified through an assessment of green infrastructure value including biodiversity, landscape value and carbon capture).
- 1.8 Finally PPW advises that replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost.
- 1.9 PPW paragraph 6.4.11 advises that planning authorities must follow a step-wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for.
- 1.10 This Paragraph goes on to state that enhancement “must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.”
- 1.11 Further to this, Paragraph 6.4.13 advises that improving ecosystem resilience, particularly improving connectivity to the immediate surroundings (in line with the DECCA Framework) would be a key

contribution to on-site avoidance, minimisation, and mitigation strategies and enhancement and that applicants should demonstrate how a development would improve the attributes of resilience as far as this is reasonably practical.

1.12 This is summarised within the diagram below:

Figure 12: Summary of the Step-Wise Approach



1.13 We consider the implications of PPW12 and Stepwise in Section 2 of this report

Technical Advice Note 23 (2014)

- 1.14 Technical Advice Note 23 (TAN 23) forms part of the wider suite of Technical Advice Notes published by the Welsh Government to support the implementation of Planning Policy Wales (PPW).
- 1.15 TAN 23 provides detailed direction on matters relating specifically to economic development. Its purpose is to assist local planning authorities both in the preparation of Local Development Plans (LDPs) and in the assessment of planning applications that involve economic considerations.
- 1.16 The guidance set out in TAN 23 operates in conjunction with the overarching principles contained in Chapter 7 of PPW, together, they highlight the need to balance economic growth with social and environmental objectives.
- 1.17 Chapter 2 of TAN 23 provides advice in respect of articulating economic benefits associated with economic development.
- 1.18 Para 2.1.5 advises that where a planning authority is considering a site allocation or planning application that could cause harm to the environment or social cohesion, it should ask three questions in order to help clarity and balance the economic, social and environmental issues:
- Are there alternative sites?
 - How many jobs will be accommodated as part of the development?
 - Would the development make any special contribution to wider policy objectives?
- 1.19 We respond to these matters within Section 2 of this report.

2. TECHNICAL RESPONSE

PPW 12 Response

Stepwise Approach

- 2.1 As demonstrated within the submitted drawings, the development proposes tree planting across the whole site, including within hardstanding areas. Concerns from the Tree Officer which have been raised by Philip Mullineux as Case Officer relate to there not being sufficient number of trees within the proposed hardstanding areas.
- 2.2 The stepwise approach has been applied to tree retention across the site. In the first instance, the applicant has sought to avoid removal of trees wherever this is achievable, via a design which seeks to balance both the economic and ecological sensitivities of the site.
- 2.3 Many mature trees across the site will be retained and the single veteran tree identified within the site will be retained and protected. Retained trees on site will be protected in accordance with 'BS5837 (2012) Trees in Relation to Design, Demolition and Construction' and based on the approved Tree Protection Scheme for the Site.
- 2.4 Whilst the applicant has sought to minimise tree loss wherever possible via innovative scheme design in line with the stepwise approach, some loss of tree species has been unavoidable. In total, the development will result in the loss of c. 30 trees across the entire site (3no. "Category A" and 27no. "Category B"). However, a significant amount of re-planting will also take place within the application site.
- 2.5 Retained trees and hedgerows will be fully integrated into the proposed scheme and will be carefully managed and maintained throughout the operation of the proposed development to ensure that trees and hedgerows remain in good health and contiguous with the new proposed areas of planting.
- 2.6 Within the detailed component of planning application P/2023/0497 there are 575 no. mixed native species proposed and within the outline component there are 546 no. mixed native species proposed. This gives a total 1,121 trees proposed to be onsite – far in excess of the 3 to 1 planting requirement set out within PPW 12.
- 2.7 Native tree species will be used throughout the scheme and will follow guidance from the North Wales Wildlife Trust and ecological consultants to include suitable local species such as Pendunculate Oak, Field Maple, Alder, Birch and Crack Willow in appropriate locations.
- 2.8 The proposed trees are located within the hardstanding areas of the site as well as soft landscaped areas and the proposed internal ecology corridor. While the importance of tree presence around the Site is recognised, the current landscape design has taken into account the requirement for vehicle movements around the Site to support economic development in line with PPW 12.
- 2.9 A Technical Note provided by TEP in March 2024, reflecting information submitted as part of the planning application, confirmed the following on loss of hedgerows within the Site, demonstrating a betterment in provision. The applicant's position is that removal of the hedgerows is critical to deliver high quality employment space of a scale that meets market demand

	Retained	Lost	New
Hedgerow	Detailed: 1.81 km Outline: 0.9 km	Detailed: 1.36 km Outline: c.0.79 km	Detailed: 2.57 km Outline: 2.26 km

2.21

Ecology Mitigation Areas

- 2.22 Planning Application P/2025/0431 'The Strategic Ecology Corridor' was submitted to Wrexham County Borough Council in June 2025. As background, Net World Sports (NWS) has a portfolio of sites which they are developing within the Wrexham Industrial Estate Area. These include:
- Land North of Bryn Lane, Wrexham – (this application) (P/2023/0497).
 - Land South Bryn Lane, Wrexham – (P/2025/0143)
- 2.23 In addition, NWS are currently considering expansion plans at their existing Net World Headquarters building. This project will also be supported by the Strategic Ecology Corridor.
- 2.24 The Strategic Ecology Corridor is proposed to provide an off-site ecological mitigation solution for all proposed developments (including P/2023/0497), as it is not possible to fully meet ecological mitigation requirements within the site boundaries of the proposed development sites. Requiring all mitigation to be accommodated on-site would compromise the efficient use of land within the Wrexham Industrial Estate, by reducing developable floorspace and limiting associated employment opportunities.
- 2.25 Within the Strategic Ecology Corridor, there are five parcels of land, all of which have landscaping strategies. In total, across the whole corridor, there will be an additional 170 trees planted. No existing trees within the Ecology Corridor will be lost.

TAN 23 Response

Alternative Sites

- 2.26 The Wrexham LDP was adopted by the Council on 20/12/23 and was supposed to cover the period 2013 to 2028. It formed part of the statutory development plan alongside Future Wales: The National Plan 2040.
- 2.27 However, a legal challenge was raised by Councillor Marc Jones on 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 Local Development Plan (LDP), therefore the LDP is no longer part of the development plan for Wrexham and is now un-adopted. his plan was subsequently un-adopted following a formal request to withdraw the LDP in August 2025.
- 2.28 The Wrexham LDP allocated the application site within Policy SP10: KSS3: Land to the north of Bryn Lane, Wrexham Industrial Estate. The explanatory text supporting this policy provided justification for the site's allocation.
- 2.29 LDP paragraph 3.70 advised that the qualitative evidence provided within the 2015 ELR [paras 10.99-10.100] indicated a growing land supply shortfall.

- 2.30 LDP paragraph 3.71 stated that ELR 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.
- 2.31 Furthermore, LDP paragraph 3.71 advised that the allocations would 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.
- 2.32 Therefore, whilst the LDP has been unadopted and is no longer part for the development plan, the evidence utilised in its formation sets out a clear demand for additional employment land that is sufficiently large to meet the diverse range of requirements identified within the ELR.
- 2.33 At a strategic level, the Proposed Development forms an extension to the Wrexham Industrial Estate. This is a critical employment area for Wrexham and the wider area and therefore, the most logical location for any significant employment growth.
- 2.34 The Wrexham Industrial Estate is unable to accommodate any meaningful growth organically. There are limited infill sites available, many of which are already subject to planning permission (such as the Kingmoor site being promoted by FI Real Estate off Bryn Lane) or planning applications (such as Land South of Byrn Lane being promoted by Net World Sports).
- 2.35 In addition, Wrexham Industrial Estate is also seen as being important from an ecology perspective, with various projects for conservation and enhancement of protected species. At best, piecemeal development on irregularly shaped sites is achievable which do not support meaningful growth or create flexible conditions to attract new entrants to the market.
- 2.36 Therefore, accommodating further growth of this nationally significant employment site located within a National Growth Area requires land for expansion beyond its current boundaries. An assessment is provided below, with reference to the map in Appendix A to consider alternative potential sites, which could accommodate this employment growth.
- Location A: The Proposed Development is located to the north of the Wrexham Industrial Estate and currently comprises agricultural land which is not Best and Most Versatile Land (Grade 3B). It is also not located within a Flood Zone or known to be ecologically significant. It is also benefits from excellent access to the local and national highway network via Industrial Estate Way.
 - Location B: Does not comprise Best and Most Versatile Land and is located within a Flood Zone. Weaker connections to the national highway network. Whilst not currently ecologically significant, the land is subject to either a live planning application to be used for ecological purposes.
 - Location C: Not Best and Most Versatile Land (Grade 3B). It is also not located within a Flood Zone. Subject to a live planning application (P/2025/0430) for where more than 80% of the scheme is being provided for ecology land, highlighting its importance from an ecological perspective. Also includes non-designated heritage assets. Weaker connections to the national highway network. Special Landscape Area further to south.
 - Location D: Not located within a Flood Zone or known to be ecologically significant. It is also benefits from excellent access to the local and national highway network via Sesswick Way. Best and Most Versatile Land (Grade 3A).
 - Location E: Green Barrier / Green Wedge within local planning policy offers strong planning policy protection against development. Policy 20 of Future Wales is noted.
- 2.37 With the above in mind, it is considered that Location A (Land North of Bryn Lane) should still be the primary location for expansion of the Wrexham Industrial Estate and is most capable to

accommodating significant growth, delivering economic benefits and that therefore, there are no suitable alternative sites which could accommodate this growth.

- 2.38 In addition, the design has been subject to significant design evolution, as outlined within Section 7 of the Design and Access Statement, before considering that the proposed layout in the illustrative masterplan was appropriate. This exercise included layering on technical constraints, such as access arrangements, alongside a design rationale (creating a sense of arrival), and operational considerations (the importance of an accessible service yard and an appropriate footprint). This exercise included considering different options for the eastern portion of the Proposed Development.

2.39

Socio-Economic Benefits

- 2.40 Utopia City (the “Site”) presents a generational opportunity to transform the economic performance of North Wales by delivering long-term, sustainable employment at the internationally recognised Wrexham Industrial Estate. The scheme will support job creation, skills development and inclusive regional growth.
- 2.41 As the fourth largest industrial estate in Europe, investment to support the delivery of Utopia City will build on the strength of an existing and highly successful employment location. The initiative goes beyond the provision of new employment floorspace; it will create a high-quality gateway to the Wrexham Industrial Estate and introduce strategically important amenities.
- 2.42 Chapter 7 of the submitted Environmental Impact Assessment sets out the number of jobs anticipated during the construction and occupation of the Site. Employment arising from demolition and construction works has been assessed using the Applicant’s estimated capital construction costs, applying standard ratios between construction value and labour derived from the latest published Annual Business Surveys (ABS, 2012).
- 2.43 Employment expected to be generated by the proposed use at the completed development stage has been estimated using standard job density ratios derived from the HCA Employment Density Guide.
- 2.44 The build out period for the proposed development has been identified as taking approximately 88 months (382 weeks). The total employment over a 12-month term would be for approximately 656 construction jobs based on the capital construction costs.
- 2.45 Based on information provided by Net World Sports and the application of standard employment density assumptions for the proposed uses, the development is expected to generate between 1,660 and 3,352 full-time equivalent (FTE) jobs upon completion. As a result, the scheme is anticipated to deliver very significant positive impact upon employment at the Borough-level during the operational phase.
- 2.46 If the large format warehouses were reconfigured to accommodate the hedgerows, then there would be inefficiencies incurred in the new layout and issues with developing an effective internal road network. These might include, for example, additional service-yards and back-of-house requirements. This would reduce the amount of employment floorspace which is critical for job-creation.
- 2.47 As such, the scheme fully promotes and supports the objectives of PPW with regard to economic growth and prosperity.

Special Merits of the scheme

- 2.48 In terms of **7C (Special merit)**, the Proposed Development would achieve against the following objectives within Planning Policy for Wales (PPW):
- 2.49 PPW references the following goal from the Well-being of Future Generations Act (2015): “A ***Prosperous Wales can be achieved through increased economic activity across all sectors and at all scales***. This is realised through the availability of employment land”
- 2.50 Paragraph 5.4.3 of PPW states “Planning authorities should ***support the provision of sufficient land to meet the needs of the employment market at both a strategic and local level***. Development plans should identify employment land requirements, allocate an appropriate mix of sites to meet need and provide a framework for the protection of existing employment sites of strategic and local importance.”
- 2.51 Paragraph 5.4.4 of PPW states “Wherever possible, ***planning authorities should encourage and support developments which generate economic prosperity and regeneration***. Sites identified for employment use in a development plan should be protected from inappropriate development.”
- 2.52 Paragraph 5.4.11 of PPW states: “Strategic employment sites should be identified at a regional scale by agreement amongst local authorities on which sites best serve the area as a whole. ***Careful consideration should be given to the attributes of strategic employment sites to ensure that they have unique selling points and provide a differentiated offer across the region***.” [Note: No regional policy exists in North Wales but the LDP evidence base includes the Wrexham & Flintshire Employment Land Review Study 2015]
- 2.53 Paragraph 5.4.17 states: The Welsh Government’s Enterprise Zones are an example of where co-ordinated action can take place to encourage investment in a particular sector in a particular place. ***Planning authorities should seek to support the development of business networks and clusters*** particularly in relation to innovative and technology based enterprise
- 2.54 Taken together, these paragraphs within PPW identify an objective for decision-makers to support proposals which deliver differing scales of employment generating development that meet the need of the employment market. This is especially where these have unique selling points, support the development of business networks, and provide a differentiated offer across the region. As noted above, the Proposed Development will deliver 28 ha of employment space, deemed suitable for large scale uses which meet identified demand in Wrexham.
- 2.55 The application scheme represents a generational opportunity to significantly enhance the economic prospects of North Wales, driving long-term, sustainable job growth at an internationally recognised employment location at the Wrexham Industrial Estate.
- 2.56 As one of the largest industrial estates in Europe, delivering this scheme will capitalise on an already established employment hub. This initiative is not simply about creating new floorspace to accommodate direct job growth and improve skills. It is about providing a gateway to the Wrexham Industrial Estate and delivering much-needed amenities that will significantly enhance the existing offering and improve facilities for the current estate.
- 2.57 The proposed development can go beyond traditional employment growth and can promote the clustering of complementary employment activities, fostering “sticky” growth which that can be catalytic for the wider estate. The ambition to develop economic clusters within North Wales is well established within regional policy – notably Planning Policy Wales and Future Wales 2040.

- 2.58 The Wrexham Industrial Estate is already home to companies with international significance who occupy significant amounts of floorspace. These including Kellanova (listed on the New York Stock Exchange), Hoya Corporation (Listed on the Tokyo Stock Exchange) and Wockhardt (listed on Indian Stock Exchanges). In addition, privately owned companies like JCB are global powerhouses in their industry. Providing much needed amenity for these businesses will improve the prospects of all occupiers across Wrexham Industrial Estate – not just those within the site red edge.
- 2.59 The proposed scheme provides a significant amount of floorspace to accommodate development at a scale not realised within Wrexham in recent memory. The applicant can continue their work to identify the large occupiers and key sectors that they can leverage as future tenants for the scheme, both from the domestic and international markets.
- 2.60 Ambition North Wales is a joint initiative between the UK and Welsh governments, supported by Flintshire and Wrexham Councils. It promises a £160 million investment over the next ten years to catalyse £1 billion in private investment and create around 6,000 jobs.
- 2.61 The long-term ANW initiative is seeking to transform the region into a hub of advanced manufacturing excellence, making it an extremely attractive prospect for investors and inward investment.
- 2.62 The considerable funding package has been made available to continuously invest in the region's infrastructure and provide a stable, supportive environment where businesses can thrive; having regard to; access to resources, proximity to customers and availability of skilled labour.
- 2.63 Supporting schemes such as the one proposed is the fundamental purpose of the Investment Zone. Through delivering jobs which are accessible from across North Wales, this instils confidence in the wider economy and provides greater opportunity. It generates additional tax income through Business Rates.
- 2.64 The proposed development has the support of the Investment Zone. With this support, it will deliver up to 1.46 million square feet of advanced manufacturing space with flexible industrial floorspace which fosters innovation, directly contributing to its objectives. Encouraging quality tenants to boost productivity and higher quality jobs, which will lead to increased earnings for high and low skilled workers who will benefit from upskilling.

3. CONCLUSION

- 3.1 We have demonstrated within the previous paragraphs that the applicant has followed the “stepwise” approach in line with PPW 12.

Step 1 & 2: Through a carefully considered design, the applicant has sought to avoid where and minimise the loss of any trees on-site wherever possible. This has resulted in the retention and protection of the single veteran tree within the application site.

Step 3 & 4: Whilst a small number of trees have been lost within the site, this is unavoidable. Notwithstanding this, a significant planting amount of new planting is proposed. This will link in with retained habitats and create a significant uplift in tree planting across the site. Existing hedgerows and trees across the site will be carefully managed moving forwards to ensure that they continue to thrive.

Step 5: Finally, a significant level of off-site ecological habitat is being created in association with this proposal. This off site habitat will deliver significant levels of new tree planting that will reprove any lost trees on a basis that is far in excess of 3 to 1.

- 3.2 Furthermore, we have demonstrated that the scheme is in accordance with criteria set out within TAN 23 in terms of justifying proposals which have the potential to cause harm to the environment.
- 3.3 In summary, whilst some minimal tree removal has been necessary to facilitate development associated with Planning Application P/2023/0497 (c.30 trees), the employment growth and socio-economic benefits that Utopia City would bring to Wrexham Industrial Estate and the Borough as a whole, will be profound and far-reaching.
- 3.4 Furthermore, there will be a significant uplift in overall tree provision across the application site and ecological corridor (totalling c.1,200 new trees within the application site and associated ecological corridor). This will be far in excess of the circa. 30 trees (3no. “Category A” and 27no. “Category B”) that will be lost as a result of the proposed development (EIA Chapter 11 Table 11.7.1).
- 3.5 We therefore respectfully request that WCBC Planning Officer support the scheme on this basis and approve the planning application without further delay.

APPENDICES

A Map of Wrexham Industrial Estate



