[redacted]

[redacted]

Date: 22nd April 2026

Wrexham County Borough Council
Planning Service
16 Lord Street
Wrexham
LL11 1LG

Dear Sir/Madam,

Norish Cold Storage, Ash Road South, Wrexham Industrial Estate, Wrexham, LL13 9UG
Full planning application for the erection of two blast freezer chamber buildings, ancillary plant building and all associated works
(Planning Portal Ref. PP-14853816)

Introduction

This covering letter has been produced on behalf of our client, Thermotraffic Ltd, in support of the above referenced development at the above site.

This application comprises the following:

- Application form and associated ownership certificates;
- This covering letter, including Green Infrastructure Statement;
- Drawing pack comprising;
    - TTW-ASA-00-EX.SI-D-A-0001_(S2-P01)_Location Plan
    - TTW-ASA-00-EX.SI-D-A-0002_(S2-P01)_Proposed Site Plan
    - TTW-ASA-00-EX.SI-D-A-0003_(S2-P01)_Blast Freezer Chambers – Floor Plan Layouts
    - TTW-ASA-00-EX.SI-D-A-0004_(S2-P01)_Blast Freezer Chambers – Sections
    - TTW-ASA-00-EX.SI-D-A-0005_(S2-P01)_Blast Freezer Chambers – Elevations & 3D Visuals
    - TTW-ASA-00-EX.SI-D-A-0006_(S2-P01)_External Plant Building
    - TTW-ASA-00-EX.SI-D-A-0007_(S2-P01)_Existing Site Layout Plan

Payment of the application fee is made separately.

Site Description

The application site is outlined red on the submitted Site Location Plan. It extends to approximately 0.18ha and is located within the Wrexham Industrial Estate, c. 4.5km east of Wrexham city centre. The application site comprises the vacant land adjoining the eastern elevation of the existing Norish Cold Storage facility. The wider site comprises the existing large cold storage facility, with plant buildings attached, positioned centrally within the site. There is also an office block in the south of the site.

The site constitutes brownfield land, lying within the Wrexham Industrial Estate settlement limit. The site's immediate and wider surroundings are characterised by mixed industrial/storage and warehousing uses occupying the industrial estate.

Planning History

A review of the Council's planning history identifies the below applications relevant to the site:

- Ref: 21955 – Erection of foodcare and storage facility and alteration to existing vehicular access. Approved 16th March 1994
- Ref: 22573 – Erection of new office building to serve new cold store. Approved 10th August 1994.
- Ref: CB/1997/0887 – Siting of liquid nitrogen storage vessel adjacent to loading bays. Approved 18th February 1997.
- Ref: P/2011/0044 – Construction of 8M x 8M stand-alone building to house electricity generators. Approved 7th March 2011.
- P/2024/0247 – Extension of cold storage building, alterations to parking and landscaping. Approved 7th February 2025.

Proposed Development

The description of the proposed development is:

"Erection of 2no. blast freezer chamber buildings, ancillary plant building and all associated works."

The proposed extensions are for industrial/cold storage use (Class B2/B8). The scheme comprises 2 main built elements:

- Blast freezer chambers – two buildings containing eight blast freezer chambers total to the east of the existing building (666.24 sqm; 12.5m height)
- Plant building - to the north east of the existing building (164.77 sqm; 6.1m height)

  Total new floorspace = 831.01 sqm (GEA)

The built elements will comprise a new extension at the eastern elevation of the existing facility and extends to a maximum height of 12.5m. The height of the plant building extension is significantly smaller in scale and located as outlined above and on the enclosed application drawings.

Planning Policy Context

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that: *"if regard is to be had to the Development Plan for any purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the Plan unless material considerations indicate otherwise".*

The statutory development plan for the application site comprises Future Wales: The National Plan 2040 and the Wrexham Unitary Development Plan 1996-2011 (UDP) (adopted 2005), due to the notice of withdrawal of the Wrexham County Borough Council Local Development Plan 2013-2028 (18th March 2026).

Material considerations at a local level include relevant Supplementary Planning Guidance. Other material considerations at a national level include Planning Policy Wales and relevant Technical Advice Notes (TANs). The policies of relevance to the proposed development at both a local and national level are considered in detail below.

<u>Future Wales: The National Plan 2040 (February 2011)</u>

Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole. Under policy 1 of this document, 'where Wales will grow', the Welsh Government

supports sustainable growth in all parts of Wales. In the three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas include Wrexham and Deeside.

Wrexham Unitary Development Plan (adopted 2005)

The Wrexham Unitary Development Plan has become the de facto development plan in Wrexham due to the withdrawal of the Wrexham County Borough Local Development Plan (adopted 2023). The relevant policies in the UDP include the following:

Policy PS1. New development for employment services will be directed to within defined settlement limits/employment areas.

Policy PS2. Development must not materially detrimentally affect 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.

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.

Policy PS8. The transport network will be developed by providing an integrated range of travel options to and from principal residential, commercial, employment and education centres by making the best possible use of the existing road and rail network, including, where necessary, the provision of facilities for both passenger and freight interchange and by the encouragement of public transport, cycling and walking.

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 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 locality.

Policy GDP2. Planning obligations will be negotiated where there is a lack of capacity infrastructure, whereby the developer provides the additional capacity either on or off site. Requirements will be fairly and reasonably related in scale and kind to the proposed development.

Policy EC4. Development proposals should provide for the conservation and management of natural landscape features and include new planting in order to enhance the character of the landscape. Development which results in the loss or significant damage valuable trees or important hedgerows will not be permitted.

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.

Policy E1. Allocates 65.4 hectares of employment land at Wrexham Industrial Estate.

Policy E4. Employment development on unannotated land within settlement limits will be permitted subject to Policy GDP1.

Other Material Considerations

Planning Policy Wales (PPW) Edition 12 (February 2024)

PPW sets out that, in order to maximise well-being and the creation of sustainable places, the concept of 'placemaking' should be at the heart of the planning system. It is stated at Paragraph 2.8 that development proposals "*must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven wellbeing goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle".* Paragraph 2.9 goes on to clarify that *"The most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making, planning policy and decision making".*

PPW defines placemaking as follows: *"Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and well-being in the widest sense".*

Economic Development Policy

In assessing the sustainable benefits of development paragraph 2.26 states local planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process. Economic considerations include:

- The numbers and types of long term jobs expected to be created or retained;
- Whether and how far the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing employment opportunities or upgrading the environment;
- the contribution development would make to wider spatial strategies, for example for the growth or regeneration of certain areas.

Green Infrastructure

The use of the stepwise approach in demonstrating green infrastructure enhancement is made explicit in PPW Chapter 6.

Paragraph 6.4.15 states the first priority is to avoid damage to biodiversity in its widest sense. Where there may be harmful environmental effects, the LPA will need to be satisfied that any reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered. Applicants, in discussion with planning authorities must seek to minimise the initial impact on biodiversity and ecosystems.

Where, after measures to minimise impact, biodiversity and ecosystems could still be damaged, or lost through residual impacts, the proposed development should mitigate that damage. Mitigation measures must be put in place to limit the negative effects of a development.

All development must deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed). Even if the biodiversity value has been maintained, there must still be a pro-active process to look for and secure enhancement through the design and implementation of the development.

Planning Appraisal / Key Issues

This section addresses the principal planning policy matters relating to the proposed development, namely:

- Principle of Development
- Design, Appearance & Landscaping
- Ecology and Trees
- Green Infrastructure
- Flood Risk and Drainage
- Economic Benefits

Principle of Development

Policy PS1 and E4 permits new employment development within settlement limits subject to the proposal satisfying Policy GDP1.

Accordingly, the site lies within the Wrexham Industrial Estate settlement boundary, which is a defined area protected for employment use (B1/B2/B8 use) under Policy E1.

The site constitutes previously developed (brownfield) land, the reuse of which is advocated within local and national planning policy. The site is already in industrial storage (Class B2/B8) use and the proposal seeks to extend the facility to improve the efficiency and viability of the business, which accords with Policy PS3 in respect of seeking development on brownfield land.

Design, Appearance & Landscaping

With regards to detailed design considerations, the proposed development has specific operational requirements that have influenced the scale and design of the proposed extension and accordingly the proposed layout of the site. For example, the height of the proposed cold store extension has been determined by the height of the storage system to be installed with maintenance access.

The proposed materials have been chosen to be durable and robust, to ensure efficiency and longevity of the building, as well as to provide visual integration with the site and surroundings.

In summary, the proposal's design and landscaping scheme have been devised to balance key on site operational requirements, with maintaining appropriate appearance and amenity, in the context of a heavily industrial area in which very large, utilitarian buildings prevail. The large grounds within which the existing building sites can adequately accommodate the extension. Furthermore, the surroundings are characterised by similarly scaled, functional, utilitarian buildings and structures, of comparable size, height and scale. The design is therefore considered appropriate to the site context and character in accordance with UDP Policies GDP1 and

Ecology and Trees

No trees are present at the application site and none will be affected on the wider site.

Recent ecological investigations have taken place on the wider site during previous development which recommended precautionary measures. This has been adopted along with bat box and pond creation enhancement measures.

Due to the scale of development and surroundings a proportionate approach has been adopted towards ecological matters and the development therefore accords with UDP Policy EC4.

Green Infrastructure

The application site is subject to no nature, biodiversity or other environmental protection designations such as National Nature Reserves (NNR), Local Nature Reserves (LNR), Special Areas of Conservation (SAC), Special Protection Areas (SPA) or Site of Specific Scientific Interest (SSSI). The closest ecological designation site is the

non-statutory *'East of Wrexham Town'* Special Landscape Area which is located approximately 1.1km west of the site.

The site constitutes brownfield land within a cold storage site and is therefore wholly industrial in nature. There are no features of biodiversity value within the site itself, save for a small, grassed area, where the development is proposed.

In line with the stepwise approach, the proposed development has been designed and positioned to avoid the removal of any trees or hedgerows and is positioned between the existing building and the access road on an isolated low ecological value area. It is considered that the loss of a minimal area of grass is offset by the biodiversity enhancements underway as part of the wider development scheme. This includes substantial ecological and landscape improvements including new planting and long term habitat monitoring and maintenance, which is being implemented in accordance with an approved Landscaping Strategy, Landscaping Specifications and Planting Plan (as per permission ref: P/2025/0204) and a Great Crested Newt Conservation Plan (as per permission ref: P/2025/0170). As a result, the proposed development is not considered to materially, adversely affect habitats and species on site.

Flood Risk and Drainage

The proposed area for development is outside the extent of both Rivers and Sea, and Surface Water and Small Watercourses flood zones and is therefore considered not at risk for flooding.

Economic Benefits

The Norish site is currently an existing, important local employer. However, the cold food storage facility contains outdated technology and is not operating at its maximum efficiency. The proposed development therefore seeks to improve the efficiency and safety of existing operations at the site and for the business as a whole.

The proposed development aims to deliver and improved modern and high-quality facility, representing positive and substantial investment into the site by its owners, in accordance with the broad aspirations to improve the quality of employment sites within Wrexham Industrial Estate. The large extension area will accommodate a new automated racking cold store, designed to maximise the potential of the site for storage capacity. The design of the scheme also seeks to incorporate an element of adaptability, whereby the future needs of the business can be accommodated with flexibility.

Given the site is located within an established industrial estate, which is one of the largest of its kind in Europe, combined with the clear policy drivers to improve the quality of employment sites in this location, the economic and employment benefits of the scheme are material considerations that weigh strongly in favour of the proposal.

Conclusion

Taking account of the above considerations, we make the following conclusions:

- The site falls within the settlement boundary for Wrexham industrial Estate, where the principle of industrial / employment development is supported.
- The development will vastly improve the operational efficiency of the building, introducing new employment opportunities and a high quality modern storage facility, which represents significant investment into the site and wider industrial estate.
- The design, scale and appearance of the proposal is consistent with the industrial context of the site and its surroundings and is informed by operational requirements of the business.

The applicant is committed to delivering a high quality, sustainably designed development which will deliver economic investment to Wrexham Industrial Estate. The application proposal has been assessed against the

relevant national and local planning policy framework. In light of the above considerations, it has been demonstrated that the development proposals can comply with all policy requirements, subject to appropriate planning conditions. The overall balance of considerations weigh firmly in favour of approving the proposed development.

