VILLAGE BAKERY
COED ABEN ROAD
WREXHAM INDUSTRIAL ESTATE
LL13 9UH



CHANGE OF USE OF EXISTING BUILDING FROM USE CLASS B2/B8
TO A FLEXIBLE USE CLASS B1/B2/B8 TO FACILITATE ITS USE AS A BAKERY
INSERTION OF MEZZANINE LEVEL
ADDITION OF A SINGLE BAY REAR EXTENSION AND SIDE EXTENSION, MODIFIED PARKING AND SERVICING ARRANGEMENTS, AND INSTALLATION OF EXTERNAL SILOS AND PLANT

PLANNING, DESIGN AND ACCESS STATEMENT

Philip Moren BA(Hons) MRTPI
Planning Consultant & Technical Author
Tel: 07778 485987
pm@planning-expert.com
www.planning-expert.com

Chartered Town Planner
Royal Town Planning Institute

CONTENTS

Section **Page**

1 Introduction 2

2 Site and Surroundings (including Planning History) 3

3 Relevant Planning Policy and Advice 5

4 Application Proposal 8

5 Main Planning Issues and Planning Policy Compliance 11

Principle 11

Design/impact on character and appearance 11

Transport/highways 13

Ecology and green infrastructure 15

Drainage and phosphates 16

Other matters 18

6 Concluding Remarks 19

1 INTRODUCTION

1.1 This Planning, Design and Access Statement seeks to explain and justify the application made by Village Bakery Wrexham Ltd for change of use of an existing building from Use Class B2/B8 to a flexible Use Class B1/B2/B8 to facilitate its use as a commercial bakery, insertion of mezzanine level, addition of a single bay rear extension and narrow side extension, modified parking and servicing arrangements, and the associated installation of external silos and plant. Since these works have already been substantially completed, the application seeks retrospective planning permission.

1.2 In addition to this statement, the application is accompanied by the following drawings, which have been prepared by DPA of Oswestry, unless otherwise stated:

- Site location plan (site edged red) Dwg no. P-01 A
- Block plan as pre-existing/approved Dwg no. P-06 A
- Floor plans as pre-existing/approved Dwg no. P-15 A
- Elevations as pre-existing/approved Dwg no. P-25 A
- Block plan as existing/proposed Dwg no. P-03 A
- Floor plans as existing/proposed Dwg no. P-10 A
- Elevations as existing/proposed Dwg no. P-20 A
- Proposed drainage as-built Dwg no. 204-XOS-XX-XX-DR-C-5700 AB2 (XO Square)

1.3 The application is also supported by the following technical reports:

- Transport Technical Note prepared by Mode Transport Planning
- Drainage Strategy and Phosphorus Assessment prepared by XO Square (Civil & Structural Engineers)
- Ecological Appraisal by Ben Jones Ecology

2 Site and Surrounding Area (including Planning History)

2.1 The applicant, Village Bakery Wrexham Ltd (hereafter referred to as Village Bakery), occupies an extensive campus that measures around 14ha, which is located on the southern side of Ash Road South, towards the middle of the Wrexham Industrial Estate (the county borough's key business sector area and the primary focus for new employment development).

2.2 Village Bakery is a long-established business that supplies an extensive range of baked products to several of the UK's leading supermarkets. It is one of the city's largest employers, with a permanent workforce of around 1,000 people, most of whom are based at its Wrexham campus.

2.3 The Village Bakery campus includes six main closely-related buildings:

- a recent part-completed 2-bay bakery on Ash Road South, constructed pursuant to a planning permission granted in 2016 (Building 1). This is the principal building on the campus and houses a state-of-the-art bakery and the company's head office, including a development bakery and baking academy.
- a detached gluten free/nutrition bakery building that adjoins Building 1 to the east, with its access also from Ash Road South (Building 2, opened in 2018);
- an older detached bakery building that lies to the south, facing Coed Aben Road, which was established in around 2000 (Building 3) and manufactures bagels
- **an adjoining new building fronting Coed Aben Road (Building 4) that is the subject of this application**
- two buildings to the rear of Building 4 but also served off Coed Aben Road that make pancakes (Building 5) and scones (Building 6).

2.4 Building 4 was completed and brought briefly into use in 2024 for storage purposes pursuant to planning permission reference P/2023/0671 dated 26/04/2024, which amended the elevation plans approved under the original permission dated 05/12/2022 (reference P/2021/1189) for the *"erection of industrial unit (Class B2/B8)".* It was constructed as a replacement for a relatively modern extended bakery building of similar scale that had previously occupied the site but was demolished in 2019 following a catastrophic fire. Conditions relating to reasonable avoidance measures (RAMS) for great crested newts and for providing net biodiversity benefit were discharged by the Council on 03/04/2023 and 24/07/2023 respectively.

2.5 Building 4 is accessed via a private gated road from Coed Aben Road, which terminates at a turning head at the rear of the existing building. This private road also provides access for HGVs servicing Buildings 5 and 6.

2.6 The surrounding area is characterised predominantly by large scale food production and other employment buildings in Class B1, B2 and B8 use that are of mixed design and appearance, with many being of essentially utilitarian character that reflect the industrial processes carried out.

3 Relevant Planning Policy and Advice

National planning policy and advice

3.1 Current national planning policy is set out in *Planning Policy Wales* (PPW) Ed.12 (February 2024), which is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters.

3.2 Among other things, PPW states that *"wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration"* (para 5.4.4) and adds at para. 5.4.2:

"The Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim" [emphasis added].

3.3 TAN 23: Economic Development (February 2014) explains that in line with PPW, the planning system should steer development to the most sustainable locations, giving preference to sites within settlement boundaries.

3.4 Chapter 6 of PPW explains that a green infrastructure statement (GIS) should be submitted with all planning applications to describe how green infrastructure has been incorporated into the proposal.

3.5 Paragraph 6.4.1 of the DMM explains that the requirement to undertake pre-application consultation for major development proposals, as prescribed by part 1A of The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO), does not apply to retrospective applications.

Development plan policy

3.6 In effect, s38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise.

3.7 The previously adopted Wrexham Local Development Plan 2013 – 2018, which was subsequently 'unadopted' by the Council following a successful legal challenge, was formally withdrawn on 20 March 2026. It no longer exists, even as an emerging plan. Consequently, no weight can be given to any of its policies. The development plan now comprises *Future Wales: The National Development Plan* 2040 and the time-expired *Wrexham Unitary Development Plan*1996-2011 (the UDP).

3.8 Among other things, *Future Wales*, which deals with high-level strategic matters across the nation, recognises that Wrexham Industrial Estate forms part of the National Growth Area, which will be the main focus for growth and investment in the north region of the country.

3.9 Turning to the UDP, the most relevant policies, in my view, are PS1, PS2, PS3, GDP1, EC6, E4 and T8.

3.10 Policy PS1 says that *"New development for housing, employment, and community services will be directed to within defined settlement limits/employment areas".* The application site clearly falls within an established employment area.

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

3.12 In line with national policy, UDP Policy PS3 states that development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land, wherever possible.

3.13 Policy GDP1 is a lengthy policy that sets out general development objectives. In effect it seeks to codify routine development management considerations.

3.14 Policy EC6 deals with biodiversity conservation. While of limited relevance to the application site itself, the policy arguably has a bearing on the proposed

development's wider impacts, especially with regard to its effect on the River Dee and Lake Bala Special Area of Conservation (SAC).

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

3.16 Finally, UDP Policy T8 deals with parking provision.

Supplementary planning guidance

3.17 The Council does not appear to have adopted any local planning guidance notes (LPGN) on employment development. However, LPGN 16 on Parking (updated in 2018), LPGN 26 on Landscape and Employment, LPGN 28 on Ecology and Employment and LPGN 32 on Biodiversity were all noted in the December 2022 officer report on application no. P/2021/1189.

4 Application Proposal

4.1 The application proposal involves the following main elements, as numbered (where appropriate) on the drawings prepared by DPA:

1) The addition of a single bay (7m-long) rear extension to the pre-existing 10 bay-long building, maintaining the same roof height and pitch and side wall alignment and formed of matching materials to those used in the construction of the pre-existing/approved building (predominantly grey metal cladding).

2) The insertion of an extended mezzanine/first floor level.

3) The change of use of the building to a flexible B1 (light industry), B2 (general industry) and B8 (storage or distribution) use.

4) The addition of a narrow 15m-long ground floor side extension to the unit's east elevation to house boiler plant, using the same external facing materials as those in the pre-existing/approved building.

5) The addition of a pair of side-by-side c16m-high silos next to the building's west elevation, each storing up to 60 tonnes of flour, to be serviced from the adjoining yard in front of Building 3 (bagels).

6) Alterations to the building's rear (north elevation) to accommodate the modified servicing arrangements, with dock levellers.

7) The siting of an external dissolved air flotation (DAF) treatment plant and 2 sludge tanks in the southeastern corner of the front car park to address revised drainage requirements.

8) 2 containers next to the flour silos to house a compressor and a stream boiler.

9) Miscellaneous small-scale external plant alongside the building's east elevation at ground level.

10) Additional openings in the building's side elevations.

4.2 Although the pre-existing building was apparently constructed largely as a 'speculative development'[1], albeit as a replacement for a previously destroyed

[1] Viz. with no specific purpose or occupier in mind at the time, but to be let.

bakery building, it is now occupied by Village Bakery who intend to use it for the preparation of bakery products using largely automated production lines. The facility is in addition to Village Bakery's existing factory units and will form an integral part of its wider business. Since it will replicate existing food preparation processes, the applicant is familiar with relevant operational requirements (and impacts), with the recent changes on the site being a direct response to those.

4.3 The changes to the building's floor area are summarised in Table 1 below.

Table 1: Floor area comparison pre-existing/approved with existing/proposed (GIA)

Pre-existing/Approved B2/B8 Building	
Ground floor	2,382m2
First floor ancillary offices	316m2
TOTAL FLOOR AREA	2,698m2
Existing/Proposed B1/B2/B8 Building	
Ground floor production area	2,705m2
First floor production area	1,527m2
First floor ancillary offices	109m2
First floor canteen	93m2
First floor changing	84m2
First floor circulation	30m2
TOTAL FLOOR AREA	4,548m2
INCREASE IN FLOOR AREA	1,850m2

4.4 The bakery's production lines will operate on a 24/7 rolling basis, with day shifts from 06:00 to 18:00 and night shifts from 18:00 to 06:00.

4.5 29 new fulltime jobs would be created as a result of the development. However, due to the nature of the processes involved the number of employees who would be present on-site at any one time will fluctuate, although is not expected to exceed around 9 employees during any shift.

4.6 In simple terms, the factory has been laid out such that ingredients are delivered to the side of the building from the adjoining yard that also services the bagel unit, with the final product being despatched from the rear of the modified building.

5 Main Planning Issues and Planning Policy Compliance

Principle

5.1 Notwithstanding the description of the planning permission granted by the Council in December 2022 under reference P/2021/1189, from a review of the application plans and associated documents it would appear that the pre-existing development was promoted and assessed as primarily involving a warehouse with some first floor ancillary offices at the front[2].

5.2 Be that as it may, there is no question that the Council considers the Wrexham Industrial Estate as being a suitable location for any employment use falling within Use Classes B1, B2 and B8.

5.3 From research of other bakery developments, it appears these are generally considered to fall within Use Class B1 and not B2. Since permitted development rights do not allow for a change of use from the approved Class B2 and B8 uses to Class B1, the application seeks to regularise this matter. However, this is largely academic in this case save for a consideration of the more onerous parking requirements that normally flow from such uses, which are discussed later in this statement.

5.4 Nevertheless, it is clear that there is no objection in principle to the proposed development in this location due to the nature of its use. It would accord with both *Future Wales* and the Council's own development strategy for the location of such uses, as set out in UDP Policy PS1.

Design/Impact on the area's character and appearance

5.5 The character and appearance of the Wrexham Industrial Estate is generally undistinguished, reflecting the diverse range of employment uses it accommodates and its origins as a WW2 Royal Ordnance Factory that was

[2] For example, the drainage technical note by XO Square explained *"The proposed development will not form part of the existing bakery production facility, the building will be let to the market as a 26,692 sq ft Warehouse with associated Offices".*

dispersed over a wide area. Today, the industrial estate is home to over 340 businesses and creates employment for over 10,000 people.

5.6 The Council has not adopted any design guide or masterplan for the industrial estate.

5.7 No changes have been made to the application building's principal elevation facing Coed Aben Road.

5.8 The additional bay is located at the rear of the building and reads visually as a relatively small-scale, seamless extension to the industrial unit. It has a negligible impact on the street scene. Similarly, the narrow side extension that houses the boiler room has an insignificant effect on both the host building and its surroundings.

5.9 The most notable change that would be visible from Coed Aben Road is the installation of the two new flour silos. However, both their height and location have been dictated by operational requirements, with particular regard to delivery arrangements from the adjoining service yard and the need to provide sufficient storage capacity to maintain the rolling production lines. They are thus a fundamental part of the bakery products preparation process. Although necessarily utilitarian in character and appearance, they are set back behind the building's principal elevation and would not appear unexpected or alien within the wider context of the industrial estate.

5.10 The DAF plant would be sited within the southeastern corner of the front car park, at the lowest point in the site, so again potentially visible from Coed Aben Road. However, this will be screened by hit-and-miss fencing in order to mitigate its impact on the street scene.

5.11 While other external plant would also be visible, this would have a low profile and is not considered to be inappropriate given the industrial nature of the site and its surroundings.

5.12 Overall, the effect of the changes to the scale, design and appearance of the unit, as-built, would not unacceptably harm the character or appearance of the area. Consequently, the alterations and extensions would be in accord with UDP Policy PS2 and GDP1 in this regard.

Transport/highways

5.13 The transport technical note prepared by Mode Transport Planning builds on the Transport Assessment it prepared to accompany the application in 2021 for the pre-existing/approved speculative industrial/warehouse unit. Among other things it notes (I paraphrase):

- Vehicle and pedestrian access to the unit will remain as approved and constructed under application reference P/2021/1189, via the gated private access from Coed Aben Road.

- On average, 2 daily deliveries via 28-tonne articulated HGVs will be made to the new flour silos via the adjoining service yard attached to the bagel factory. Deliveries of other goods to the unit will be through a new door in the building's west elevation, again from the adjoining service yard. There will be no additional despatches from this end of the building. Instead, all despatches will take place from the rear of the building, where two dock levellers have been installed. Based on information provided by the applicant, there will be a total of 4 to 6 HGV movements per day.

- Swept path analysis has been undertaken by XO Square to demonstrate that the largest regular vehicle expected to enter the site (a 16.5m articulated HGV) can access the site, manoeuvre within the site and egress in a forward gear.

- With regard to waste storage and collection, it is proposed to use the existing food waste compactor in the adjoining Building 5 (pancakes) yard. Village Bakery estimates 1 additional refuse collection vehicle movement per week for this.

- It is proposed to retain 29 of the pre-existing/approved car parking spaces at the unit, inclusive of 2 accessible bays and 3 EVCP bays[3]. Additional parking will be available very close by at the car park to the rear (south) of Building 1 on Ash Road South, as permitted under application reference P/2015/0968. This lies just a 2-minute walk away and provides surplus parking for employees and visitors to the campus with a capacity of around 53 spaces. On-site parking provision will not exceed the Council's maximum parking standards and is considered to meet envisaged levels of demand, bearing in mind the applicant's experience of its existing operations. In addition, cycle parking will be provided in line with local standards.

- Turning to vehicle trip generation, based on the increase in floor area of 1,850m2 over the approved development, the as-built scheme is expected to generate an additional 14 two-way trips during the AM peak hour and an additional 10 two-way trips during the PM peak hour. This equates to around 1 additional trip every 4-5 minutes on average during the AM and PM peak period; therefore, the development would have a low impact on the local highway network.

- The report therefore concludes there are no highways or transport planning reasons why the planning application should not be approved.

5.14 In light of the assessment and conclusions set out in Mode's transport note, it is evident that the development would not have a harmful impact on highway safety or the convenience of road users, and would comply with relevant UDP policies and national policy objectives that seek to manage such impacts.

Ecology and Green Infrastructure

5.15 The ecological appraisal prepared by Ben Jones Ecology notes, inter alia, that (and I paraphrase):

[3] 6 existing spaces have been lost as a result of the need to locate the DAF plant in the corner of the car park.

- The additional bay/rear extension has been constructed on hardstanding of no terrestrial value, while the narrow side extension removed a very small strip of extremely poor condition grass. No significant negative impact is thought likely to have occurred as a consequence of these extensions.

- The site is located within the industrial estate and there is minimal connectivity to any surrounding habitat of value. There are wooded blocks 160m north and 180m northeast of site, but these are separated by industrial infrastructure with no ecological corridors. The woodland to the northeast contains a pond and great crested newts are known to be present in and around Wrexham Industrial Estate. However, the likelihood of the works as constructed being of detriment to the population is negligible.

- There was found to be no evidence of any protected species on the site, and neither does it have any value for such.

- There is no scope for ecological enhancement around the site, so none has been recommended. The step-wise approach to green infrastructure provision outlined in Figure 12 of PPW has been followed in this case.

5.16 In view of the conclusions of the ecological appraisal, it is clear that the as-built development is in accord with both PPW and UDP Policy EC6 in this regard.

Drainage and phosphates

5.17 The report by XO Square, who were involved in the 2021 application, has assessed the foul drainage strategy for the modified scheme following its change from the originally approved primarily warehouse use to a fitted-out bakery. The original drainage strategy was prepared on the basis of domestic-equivalent foul discharge only; arising from toilets and domestic appliances, and that there would be no industrial effluent discharge from the development. On that basis, the foul and surface water drainage strategy relied on conveyance to the public

sewer in Coed Aben Road and treatment at Five Fords WwTW. However, since the current scheme introduces bakery trade effluent from internal floor gullies, wash-down points and process-related cleaning activities, the original drainage strategy has had to be revised.

5.18 The report's updated drainage drawing (204-XOS-XX-XX-DR-C-5700 AB2 – Proposed Drainage As-Built (17/04/2026)) shows that the new trade effluent is collected via new internal foul runs and directed to an external dissolved air flotation (DAF) treatment area before discharge to the existing foul sewer and onward to the public sewer in Coed Aben Road. The DAF plant information and layout drawings show a Watermark Projects Model 6 unit with associated screening, chemical dosing, balance storage and sludge storage equipment.

5.19 The report notes that the site lies within the River Dee and Bala Lake Special Area of Conservation (SAC) catchment, which remains nutrient-sensitive. Current Natural Resources Wales (NRW) advice requires planning authorities to consider nutrient impacts through the Habitats Regulations Assessment (HRA) process, and nutrient neutrality may be required where downstream water bodies are failing phosphorus targets. The River Dee and Bala Lake (Wales) assessment remains phosphorus-constrained, with only 38% of assessed water bodies passing phosphorus targets in NRW's 2024 water quality assessment, the report explains.

5.20 On the basis of the information reviewed, the XO Square report advises that the installed DAF plant represents an appropriate on-site pretreatment measure for the revised bakery use. The process train - screening, equalisation, pH adjustment, coagulant dosing, polymer flocculation, flotation and sludge removal - is technically suited to removing suspended solids, fats/oils/grease and associated phosphorus-bearing material before the discharge reaches the public sewer. The treated discharge then remains subject to control within the public sewerage system and at Five Fords Wastewater Treatment Works (WwTW), which holds a reviewed phosphorus permit.

5.21 The report therefore concludes that the DAF arrangement provides sufficient pretreatment in principle for planning purposes, provided that: (i) the final discharge remains to the existing foul sewer and onward to the public sewer serving Five Fords WwTW; (ii) the plant is commissioned and operated within its design envelope; and (iii) a monitoring and maintenance regime is secured to verify the achieved effluent quality over time. However, because no measured phosphorus dataset has been supplied, the report does not claim a guaranteed final effluent phosphorus concentration at this stage; instead, it explains why the selected system is the correct treatment approach and what verification should accompany the planning and operational process.

5.22 It is noted that the pre-existing/approved building, as authorised under planning permission P/2021/1189, was screened by planning officers under the Habitats Regulations and found unlikely to increase phosphate inputs in the River Dee and Lake Bala SAC. With the revised drainage arrangements in place, as recommended by XO Square, we can see no reason why a similar conclusion should not be reached. Consequently, the as-built modified bakery building would comply with the objectives of UDP Policy EC6, which deals with biodiversity conservation.

Other matters

5.23 Given the site's location within a long-established employment area where a range of manufacturing and other business uses exist and are permissible under relevant planning policies, the current approval for Class B2 general use, the light industrial nature of the food preparation processes involved, and the absence of any dwellings in close proximity, it is clear that consideration of noise, odour or other air quality impact is not relevant in this particular case.

5.24 Moreover, when approving the pre-existing building, no concerns were raised with regard to any issues arising from potential land contamination.

5.25 As noted earlier, Village Bakery is a long-established business and leading employer within the city region, so makes a major contribution to the local

economy. The creation of new jobs associated with the development is an important material planning consideration and a benefit of the scheme, which should be afforded significant weight and supported, in line with not only the Council's own policies but also with the objectives of national policy that seek to strengthen the foundational economy, particularly in the food sector (PPW paragraphs 5.4.2 and 5.4.4 refer).

6 Concluding Remarks

6.1 For the reasons set out above, it is concluded that the substantially completed alterations, extensions and change in use of the pre-existing/approved building:

- would accord with both *Future Wales* and the Council's own development strategy for the location of such uses, as set out in UDP Policy PS1;
- would not, as a result of their scale, design, external materials or siting unacceptably harm the character or appearance of the area, so would comply with UDP Policy PS2 and GDP1 in this regard;
- would be acceptable in terms of access, parking and servicing arrangements, so would not have a harmful impact on highway safety or the convenience of road users, thus complying with relevant UDP policies and national policy objectives that seek to manage such impacts;
- would not have a harmful impact on biodiversity, so would accord with both PPW and UDP Policy EC6 in this regard;
- would make satisfactory arrangements for the treatment and disposal of surface and foul water (including as a result of the food preparation processes) and not increase phosphate inputs in the River Dee and Lake Bala SAC; and
- would create new jobs, thereby reinforcing Village Bakery's role as a major local employer, in line with not only the Council's own policies but also with the objectives of national policy that seek to strengthen the foundational economy, particularly in the food sector.

6.2 Consequently, it is hoped that the local planning authority will support Village Bakery's application and grant retrospective planning permission for the development.