

Control Sheet

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Issue	Date	Description of Amendment	By	Checked
1	15/06/26	Issued for Planning	EL	GCM
2	13/07/26	Issued for Planning	EL	GCM
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1. Introduction

1.1 This report has been prepared by TACP Architects Ltd on behalf of Ardagh Metal Packaging as a summary of our investigations into the potential for expansion to production operations at their manufacturing site in Wrexham.

1.2 Scope of Services

TACP have been appointed by Ardagh Metal Packaging to deliver design services for this project up to RIBA Stage 3 towards the submission of a full planning application.

This report is intended to provide a consolidation of the development of this project to-date.

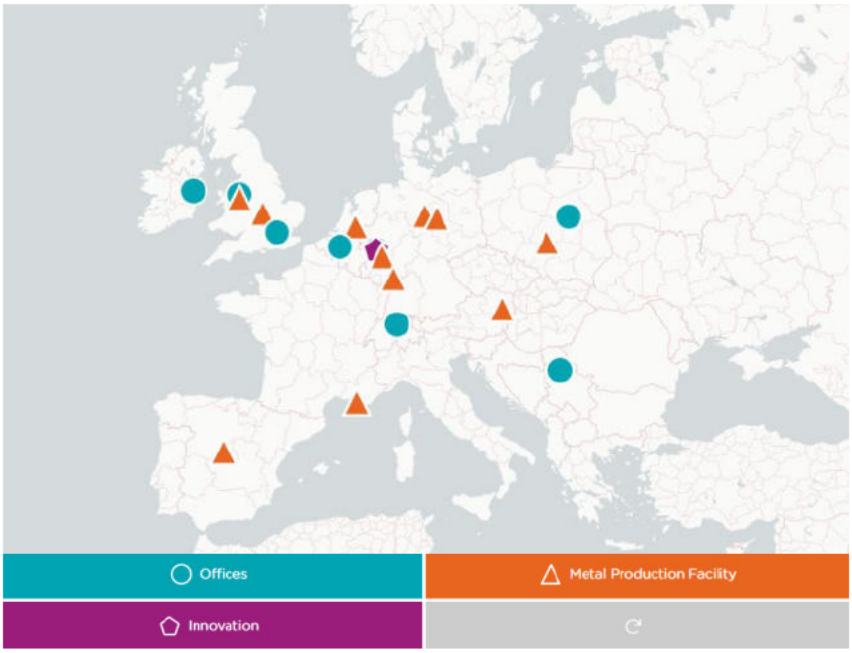
Key objectives for RIBA Stage 3:

- Refining and developing the concept design from Stage 1/2 into a coordinated proposal.
- Reviewing and resolving any clashes between disciplines.
- Starting to coordinate with all design disciplines and integrating the proposals into one plan
- Finalising information required for planning submission
- Review design to Building Control Requirements
- Address any planning conditions or feedback where applicable
- Deduce design risk and ensure the design is sufficiently developed for cost planning
- Update cost plan and programme
- Prepare design risk register
- Reviewing existing and proposed fire and accessibility strategies



1.3 Ardagh Company Background

Ardagh Metal Packaging (AMP) is a leading global supplier of metal beverage cans with 23 production facilities across 9 countries. AMP employs more than 6,000 people worldwide with sales of approximately $4.9bn in 2024.



Map of Ardagh Group's Metal Packaging facilities across Europe.

AMP's production facility in Wrexham is located on Wrexham Industrial Estate. It has another production facility nearby in Deeside and corporate offices in Chester. Elsewhere across the UK, AMP has another production facility in Rugby and an office in London.

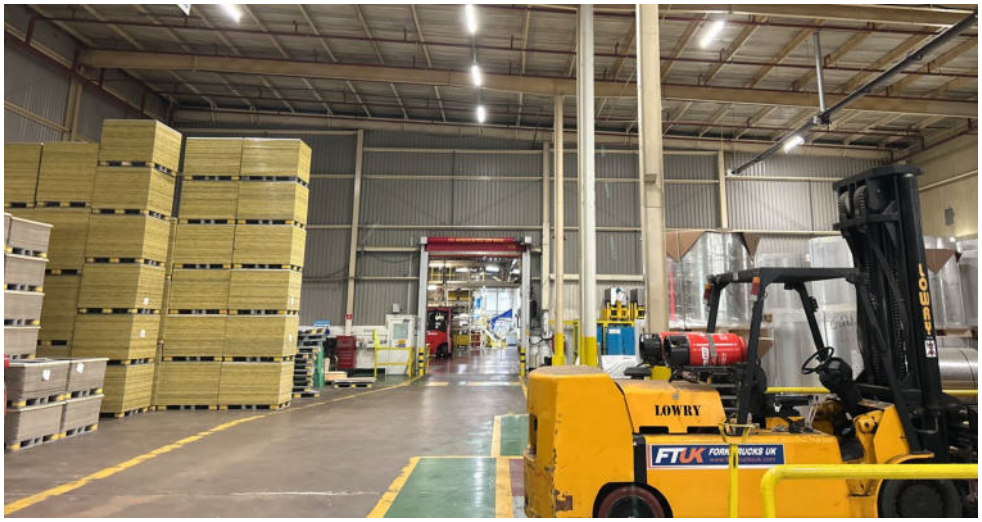


The image above is a map showing the area of Wrexham Industrial Estate. The arrow in **RED** indicates the location of the Ardagh Metal Packaging site.

2. Project Brief

2.1 Key Objectives

AMP's ultimate objective is to increase their production output at the Wrexham site by way of the installation of an additional production line. Currently the site operates with 4no. production lines within the main building, and the additional line would allow for an increased output between 50-100%.



Inside the packaging / storage area at AMP's Wrexham site.

Due to the scale of the equipment required for a new production line, its installation on site could only be accommodated by way of an extension to the existing premises. Enhancements to other aspects of site infrastructure would also be required to sufficiently support the increase in production output.

2.2 Accommodation Requirements

Below is a summary of the additional accommodation that would be crucial for the successful expansion of production operations at Ardagh's site at Wrexham:

- An extension to the existing Production building to make space for the additional machinery for a fifth production line.
    - Based on the site being closely surrounded by a woodland area, an extension to existing premises would also impact trees on site. Additional space will need to be designated for the planting of new trees, proportionate to the amount that is lost.
    - Further measures for biodiversity enhancements / the formation of new habitats will also need to be considered, in accordance with the policies for

Green Infrastructure set out in Section 6 of the Planning Policy for Wales (PPW).

  - The extension would also affect the current fire strategy within the building and across the site. A revised fire strategy will therefore be needed for both, coordinated with the proposed development. This may require modifications or upgrades to existing fire safety infrastructure, such as the sprinkler system.
- Additional car parking, to support an increase in staff numbers.
- Additional locker rooms / welfare facilities, to support an increase in staff numbers.
- Improvements to the Warehouse building and the Tunnel link between the two main buildings.
- Upgrades to electric or other utility supplies may be required, since increased production rates will consume more energy.
  - The client has advised that the proposed increase to production output would give rise to a requirement for the installation of a Regenerative Thermal Oxidiser (RTO), which would help to combat hazardous air pollutants released during the manufacturing process.
  - Similarly, there would also be a requirement to upgrade equipment for the treatment of wastewater that is produced because of the manufacturing process.
- Additional storage space for raw materials.
  - A recent application, has been approved to remove the existing underground lacquer tanks at the south-east corner of the Production Building and replace it with four above-ground tanks.
- There will be an increase in the frequency of deliveries, therefore it will be necessary to ensure that the site can accommodate the anticipated traffic levels.
  - As a minimum, an additional HGV loading bay for the Warehouse building should be provided.
- There will be an increase in area of non-permeable surfaces. Provision for the additional attenuation of surface water will need to be considered.
- Consideration will also need to be given to increasing the capacity for foul drainage, including new equipment for Sewage Treatment.
- Consideration will also need to be given to increasing the capacity for of waste the site produces, such as skips, bins and removal of the waste.

3. Design Principles

3.1 Planning Policies

- There is a statutory requirement for building developments to comply with Local and National Planning Policies. The following policies have been identified as being relevant to the proposed development:
    - National Policies:
        - Planning Policy Wales, Edition 12, 2024
        - Future Wales: The National Plan 2040
        - Technical Advice Note 12 (TAN12): Design
        - Technical Advice Note 15 (TAN15): Development, flooding and coastal erosion
    - Local Policies:
        - Wrexham County Borough Local Development Plan 2013-2028
        - Local Planning Guidance Note 7: Landscape and Development
        - Local Planning Guidance Note 16: Parking Standards
        - Local Planning Guidance Note 17: Trees and Development
        - Local Planning Guidance Note 26: Landscape and Industrial Development
        - Local Planning Guidance Note 30: Design

3.2 Building Regulations

- There is a statutory requirement for building developments to comply with the National Building Regulations. A non-exhaustive list of aspects of building work covered by the Building Regulations for Wales includes:
    - Structure
    - Fire Safety
    - Acoustic performance
    - Protection from Falling
    - Conservation of Fuel and Power
    - Access to and Use of buildings

- Meeting the requirements set out in the relevant Building Regulations will be achieved firstly by anticipating critical design aspects during early design stages, followed by subsequent detailed design development, after which the proposals will be assessed for approval by an approved Building Control Officer. During construction, building work will be carried out by Competent Persons whose work will be assessed by an approved Building Control Officer at key intervals to ensure compliance.

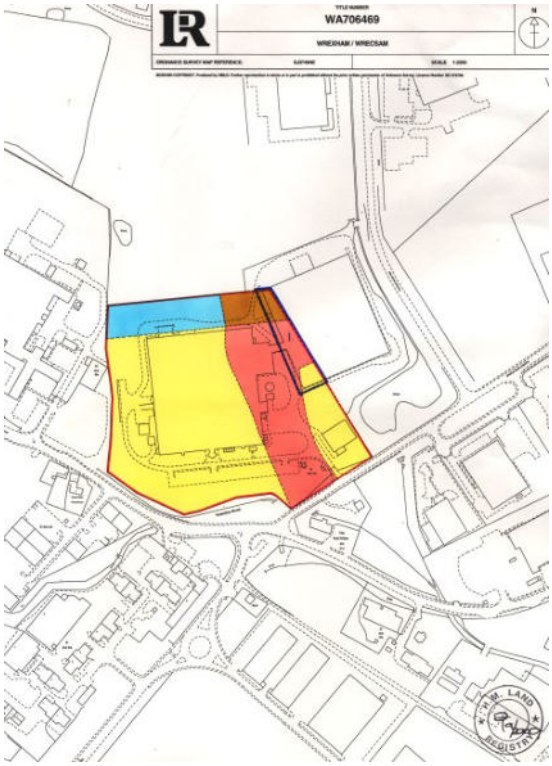
3.3 Non-Statutory Design Guidelines

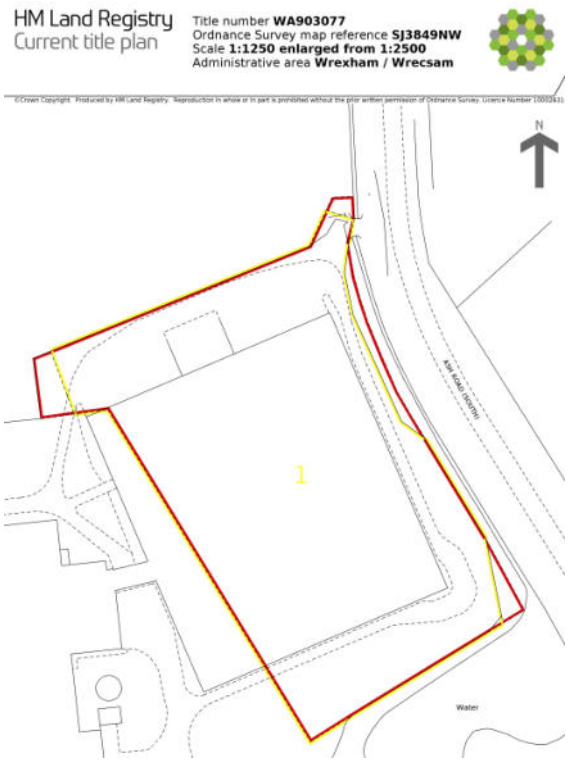
- The client has specified that the proposed development should be designed in accordance with the following non-statutory design guidelines:
    - No specific guidelines have been identified.

4. Site – Surveys and Findings

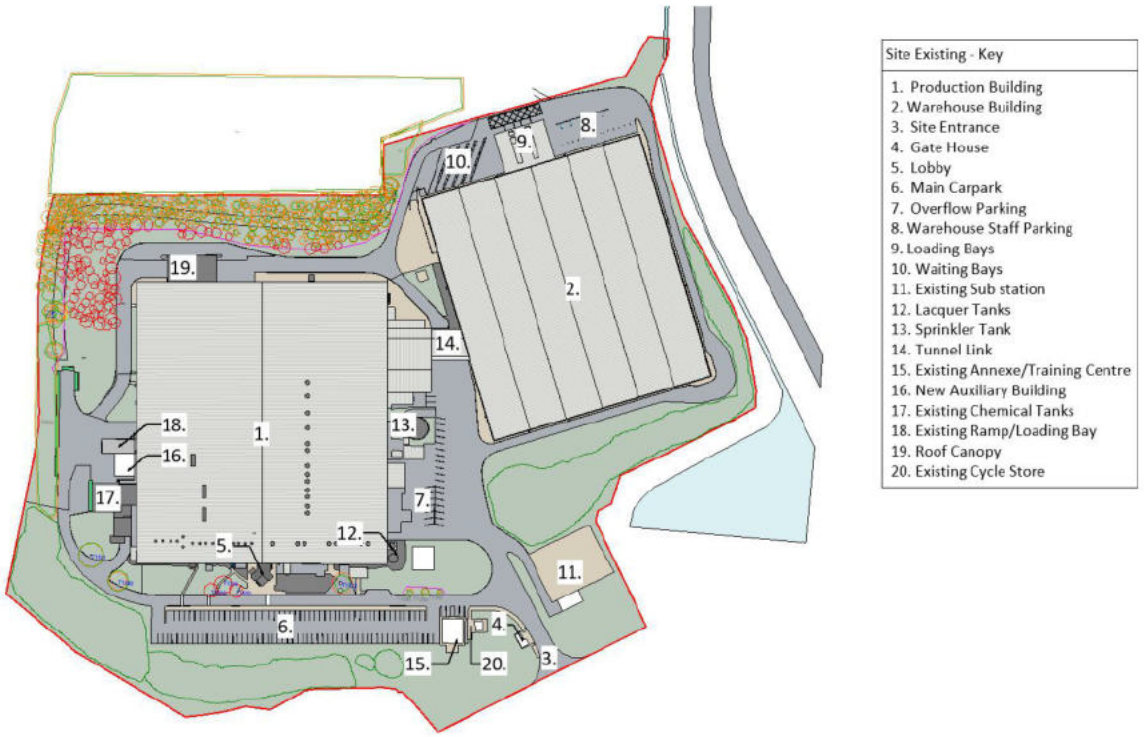
4.1 Site Boundary and Extents

An inquiry with HM Land Registry confirmed the boundary extents for the Ardagh site as shown in the images below. It appears that historically, the site was two separate parcels of land which have since been merged into one, under a single ownership.





4.2 Existing Site Overview



Existing Site Plan of the Wrexham Ardagh Plant.



Photo of the Ardagh site, taken from the South-East corner of the Production building.



Photo of the Ardagh site, taken from the main entrance to the Production building, with the main car park visible.

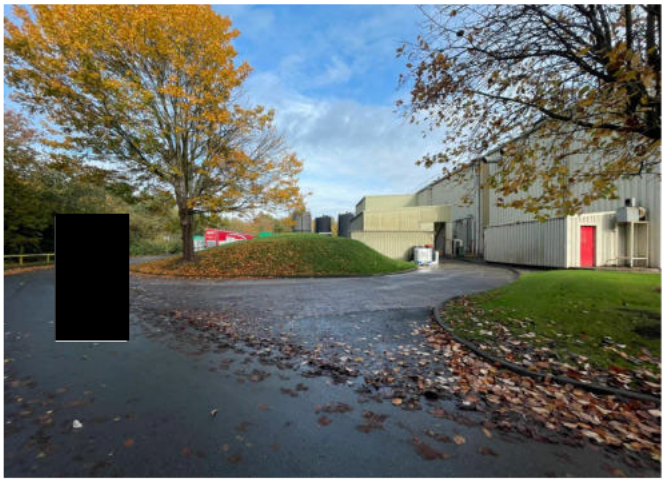


Photo of the Ardagh site, taken from the South-West corner of the Production building, looking North.



Photo of the Ardagh site, taken from the North-West corner of the Production building.

4.3 Associated Planning Applications

The application site has been the subject of numerous planning applications historically, all of which comprise of developments to expand/ improve the working facilities at the manufacturing plant.

- P/2026/0313 – Change of use application
- P/2026/0074 – Replacement of Underground tanks with 4no. above ground storage tanks
- P/2025/0527 - Erection of auxiliary building (class b2 - general industrial) on existing hardstanding – granted 18/08/2025
- P/2019/0013 - Erection of office accommodation adjoining existing warehouse – granted 23/04/2019
- P/2018/0074 – Extension to existing industrial unit – granted 11/04/2018
- P/2017/0067 - Extension to provide new scrap handling system (in lieu of application previously granted under code no p/2016/1151) – granted 09/03/2017
- P/2016/1151 – Installation of new scrap handling system within enclosure on roof – granted 20/01/2017
- P/2006/0595 – Single storey steel framed factory extension – granted 20/06/2006
- P/2000/0215 – Construction of new loading tunnel – granted 28/04/2000

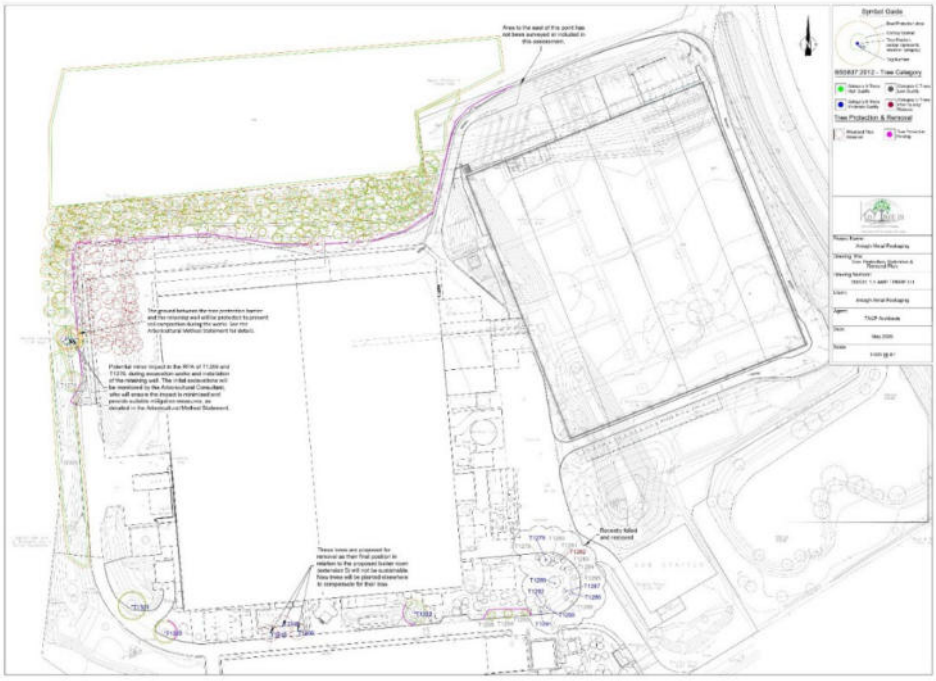
In addition to the above, there has been a recently submitted planning application for the circulation road and retaining wall to be applied for separately, planning reference number P/2026/0446.

4.4 Trees

Tree21 Ltd. was commissioned to undertake a BS5837 tree survey at the Ardagh Metal Packaging site in November 2025. Since the original survey was completed, the scope of the proposed development has expanded, and an updated survey was therefore carried out in May 2026.

A woodland belt encloses most of the site. The original survey area was defined by early sketch proposals for the principal extension to the north and north-west elevations of the Production Building. At that stage, proposals were also being considered to replace the existing underground lacquer tank with four above-ground tanks. As a result, the tree group to the south-east of the Production Building, close to the lacquer tank area, was included within the survey extent.

The updated survey also takes account of additional proposed works to the south of the Production Building, including a new two-storey extension.



Existing Plan of the Wrexham Ardagh Plant, as produced by Tree21, showing an overview of the trees that were surveyed during their site visit on 18/05/2026.

The most recent survey identified a total of 416 trees, comprising of:

- Category A: 0
- Category B: 18
- Category C: 400
- Category U: 1

To facilitate the development, 102 trees are proposed for removal, including 99 Category C and three Category B trees (T1318, T1319, and T1400). In addition, 16 trees were felled for separate management reasons between the survey and this assessment. To mitigate losses, an extensive replanting programme will be implemented at a minimum replacement ratio of 1:1, supported by appropriate aftercare. The 1:1 ratio replacement was recommended by specialist consultant.

Tree protection measures and an Arboricultural Method Statement have also been prepared to ensure that tree removal, retention, pruning, and protection are properly managed throughout the project.

4.5 Ecology

Cambrian Ecology Ltd. was appointed to carry out a Preliminary Ecological Assessment (PEA) Report on the land at Ardagh Metal Packaging in November 2025. Since the original survey was completed, the scope of the proposed development has expanded, which required an updated survey to be carried out.

Existing habitats most likely to be impacted by the proposed development were identified as the area of amenity grassland on the Southeast corner of the Production building, where the proposed lacquer tanks would be located, and the area of amenity grassland, dense scrub and immature broadleaf woodland located to the West and North perimeter of the site.

The ecological survey concludes that the proposed development is unlikely to result in any significant ecological impacts from the loss of amenity grassland, scrub, and ornamental planting. However, further surveys and mitigation measures are required to address potential ecological constraints, abundance of the protected bee orchids and, if necessary, translocating them before works begin.

While no invasive non-native species were recorded, the known presence of great crested newts within 500m of the site means that a European Protected Species licence from Natural Resources Wales will be required, alongside the implementation of proposed mitigation measures. Additional assessments are also needed to determine whether trees on site contain bat roosting features, and reasonable avoidance measures must be followed to protect any other protected species that may be present.

To support the planning application, a Green Infrastructure Statement has been prepared as part of this application, it will set out biodiversity enhancement opportunities for the site.

4.6 Flood Risk

The map featured below has been provided by National Resources Wales (NRW) and illustrates the potential extent of any flooding for the identified site and surrounding area. Data is available for the risk of flooding from rivers, sea, surface water and small water courses.



Technical Advice Note 15 (TAN15) provides national guidance for developments in relation to flooding and coastal erosion. It defines the criteria for which the risk of flooding to an area is significant enough to require consideration be given to the effect that the potential flooding may have on any proposed development.

TAN15 states that the provision of a Flood Consequences Assessment (FCA) would be required for any development proposal located fully or partly in Flood Zones 2 or 3 for Surface Water and Small Watercourses. The purpose of the FCA is to primarily determine the risk and consequences of flooding on the proposed development, and what impact the development might have on flood risk elsewhere. The FCA must be conducted by a fully qualified and competent flood consultant.

The Flood Zones for Rivers, Surface Water and Small Watercourses are defined by NRW as follows:

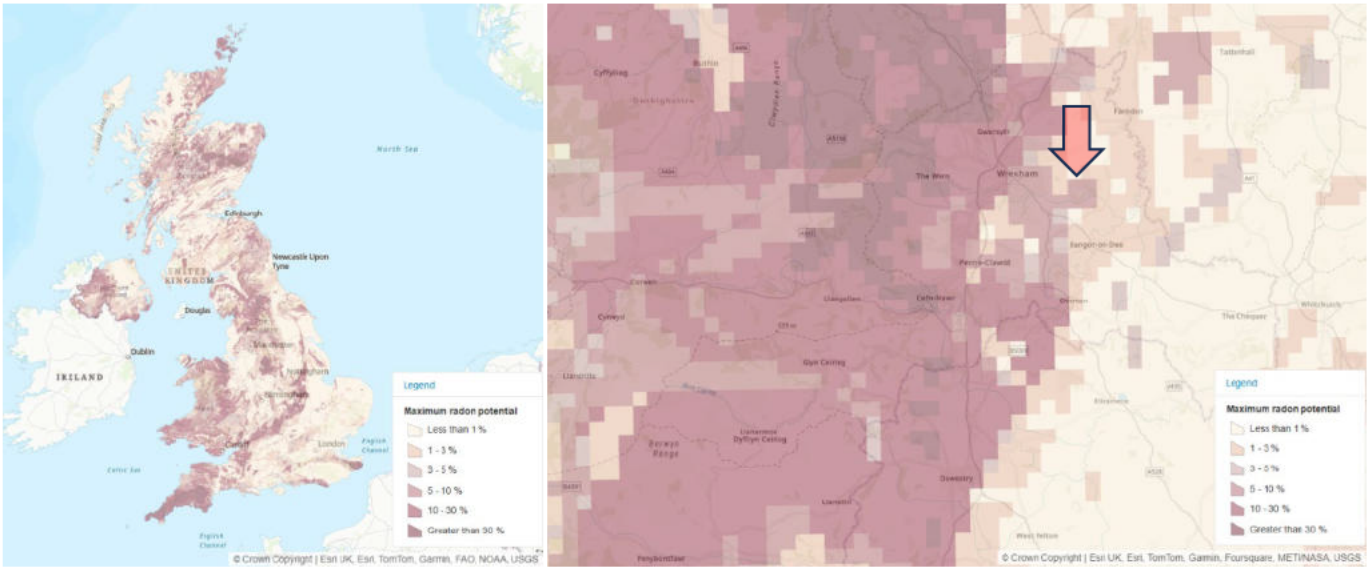
- Flood Zone 2: Areas with 0.1% to 1% (1 in 1000 to 1 in 100) chance of flooding in a given year, including the effects of climate change.

- Flood Zone 3: Areas with more than 1% (1 in 100) chance of flooding in a given year, including the effects of climate change.

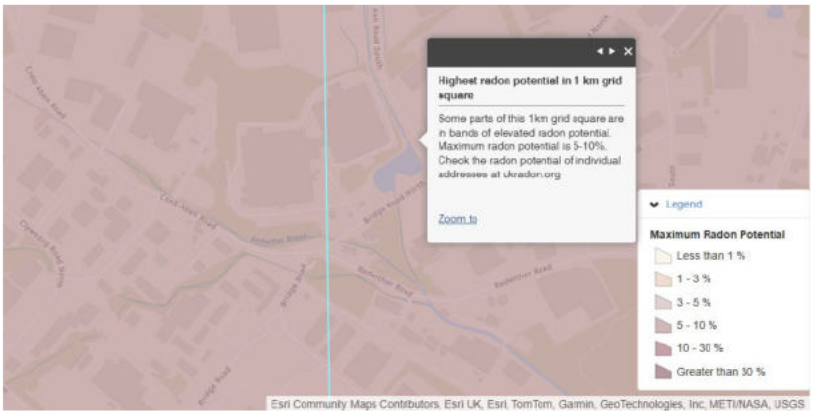
The Flood Map provided indicates that part the proposed development site is located in Flood Zones 2 and/or 3.

4.7 Radon

The maps below have been sourced from ukradon.org and show the areas of the UK affected by the presence of high levels of radon gas. The data shows that the application site is within a catchment area with between 5-10% chance of high levels of radon gas.



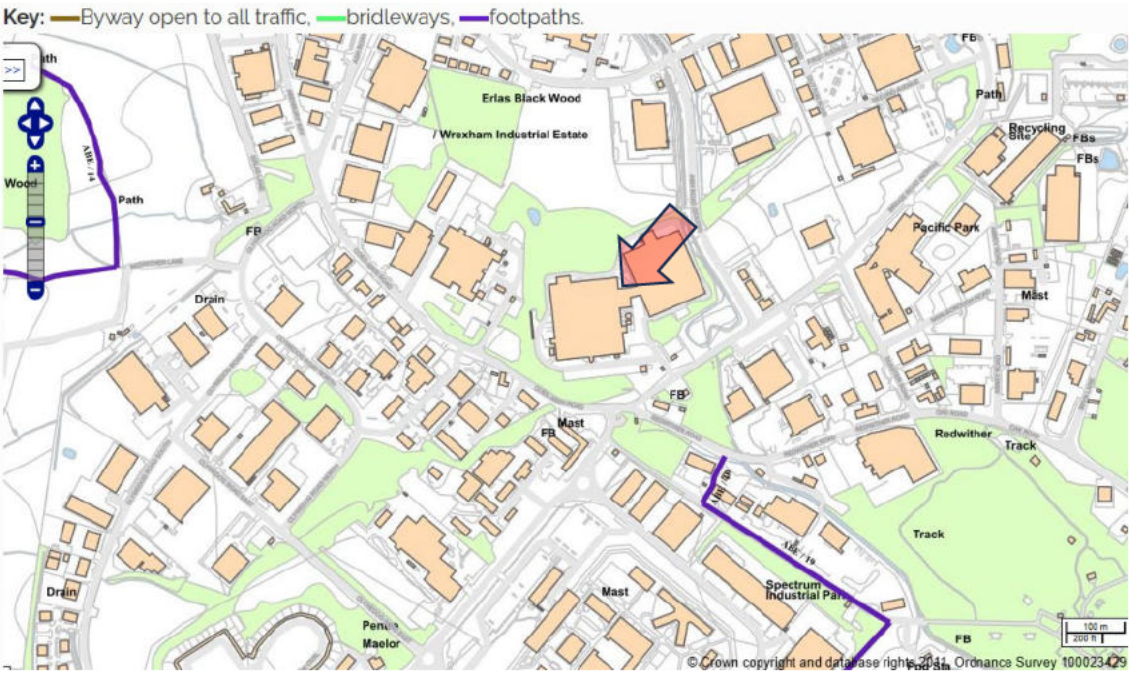
Developments subjected to high levels of Radon gas need to be constructed with appropriate protective measures so as to mitigate against any potential exposure to high levels of Radon. Full guidance on the protective measures required have been set out by the Building Research Establishment (BRE).



4.8 Public Rights of Way (PROW)

The map below shows the location of any Public Rights of Way in the area surrounding the proposed development site. The map can be accessed at https://www.wrexham.gov.uk/service/public-rights-way/public-rights-way-definitive-map

The nearest PROW to the development site is approximately 200m to the South East and is unlikely to be affected by any works related to the proposed development, either directly or indirectly.



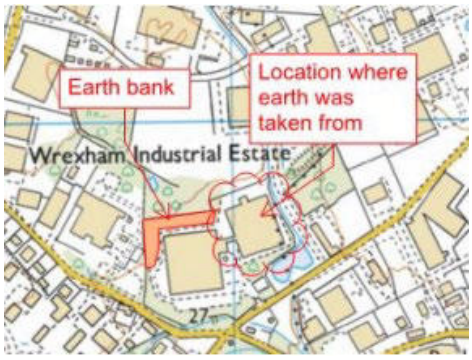
4.9 Land Contamination

In March 2021, Datrys were appointed to undertake contamination testing on an earth bank at the Ardagh Wrexham site. The earth bank is believed to have been formed from ground excavations during the construction of the building currently known as the Warehouse building (see illustration to the right).

Current proposals for the extension to the Production building will depend on the removal of this earth bank, in order to form new road access around the site. It is therefore important to understand if there is any contamination present in these areas.

5x samples of the earth bank were taken for testing from the areas shown in the drawing below to determine whether any contamination was present.

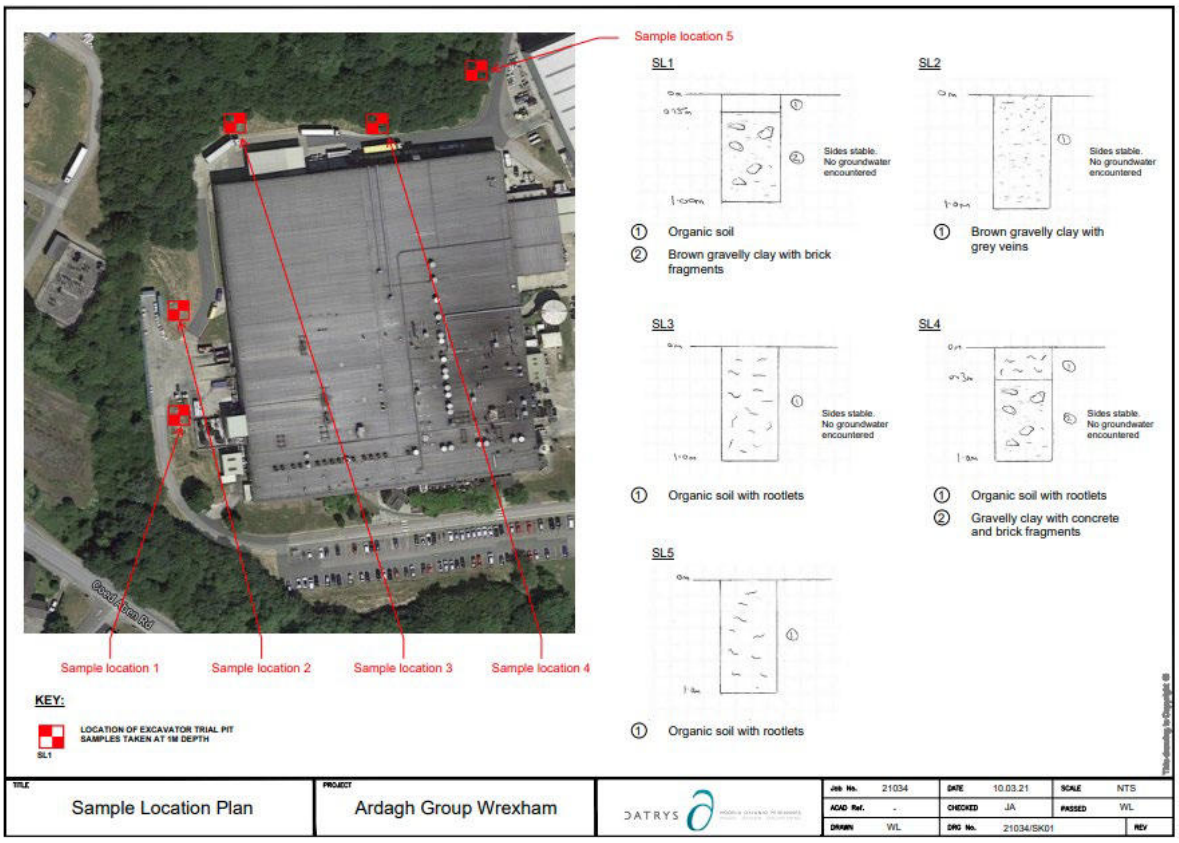
Results from the testing concluded that the soil in these areas is non-hazardous waste / stable non-reactive.



Images above and below have been extracted from the Contamination Report produced by Datrys.

The image above identifies the original location of the soil and to where it was relocated during the the construction of the Warehouse building.

The image below shows where the samples were taken from for testing and diagrams of their composition.



4.10 Utilities

4.10.1 Maps of Existing Utilities

The following images are the historical records we have received of existing utilities at the Ardagh Wrexham site. It should be noted that these records may now be out of date and further confirmation should be sought as to the location of exiting underground services prior to any detailed design or development works on site.

The cable plan from Scottish Power is dated 2018. To the Northeast corner of the Production building, a 11kV cable route appears to cut through the site. This cable could potentially clash with the proposed development and may need to be re-routed.

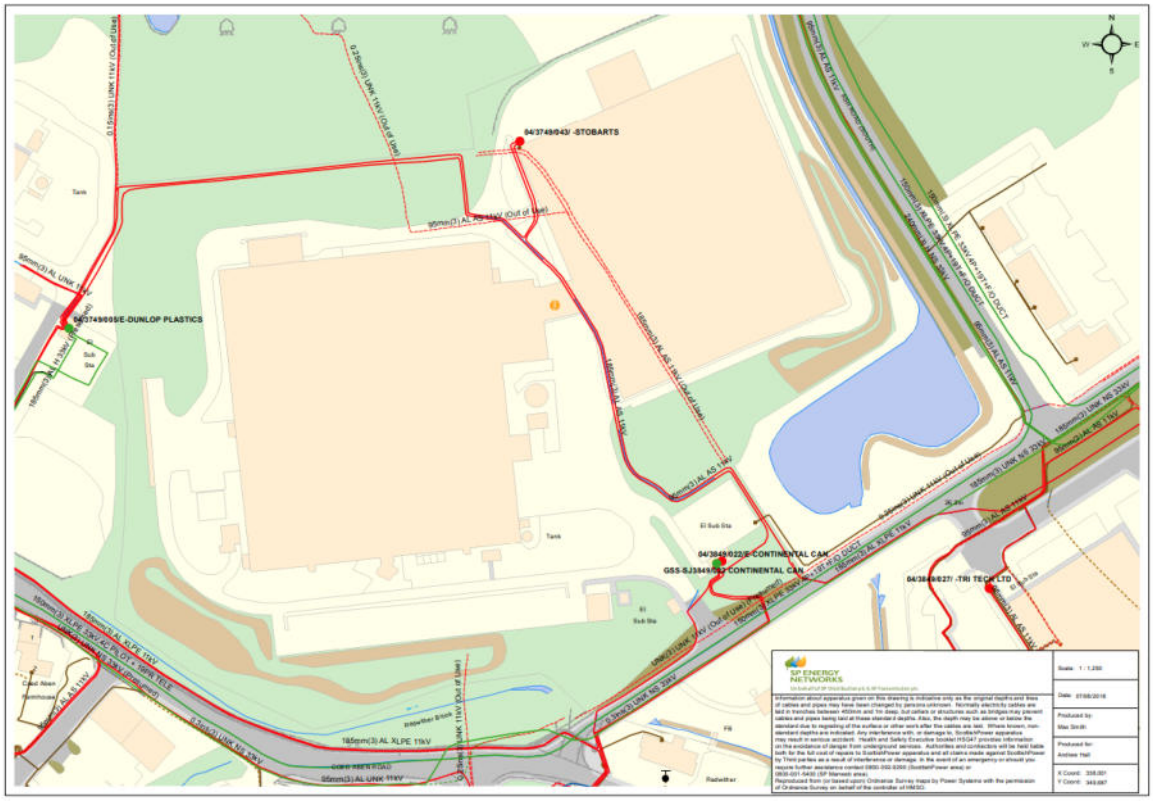
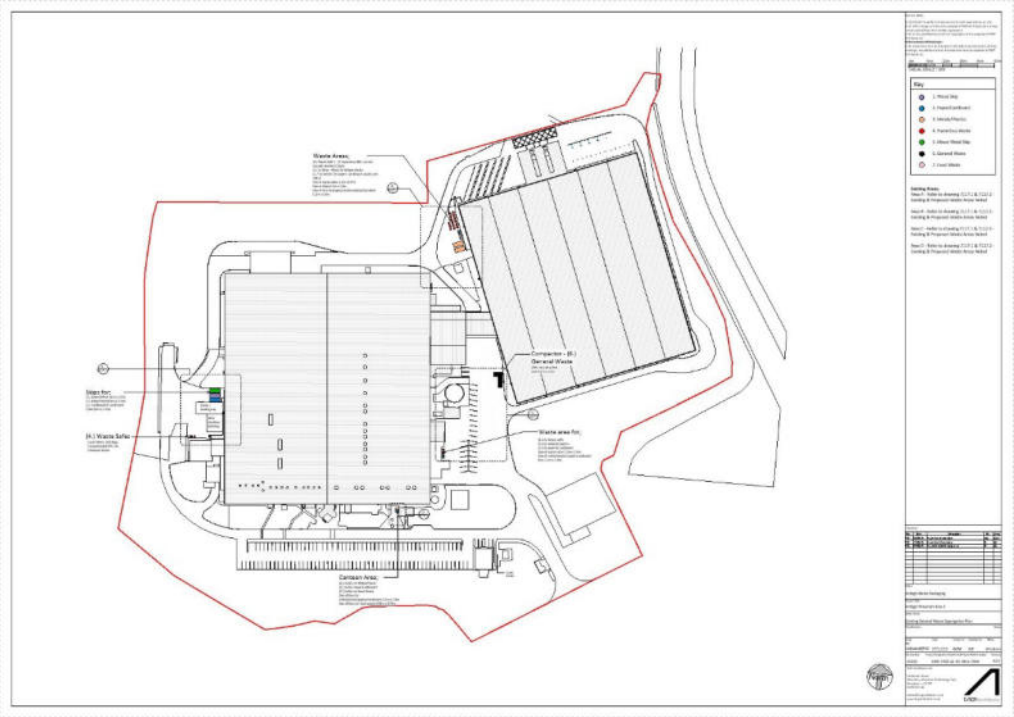


Image: Electric Cable plan by Scottish Power, 2018.

Refer to document "25283-DPL-XX-XX-RP-ME-0001 Ardagh Metal Packaging Facility – Utility Report" for additional utility information.

4.11 Waste Management

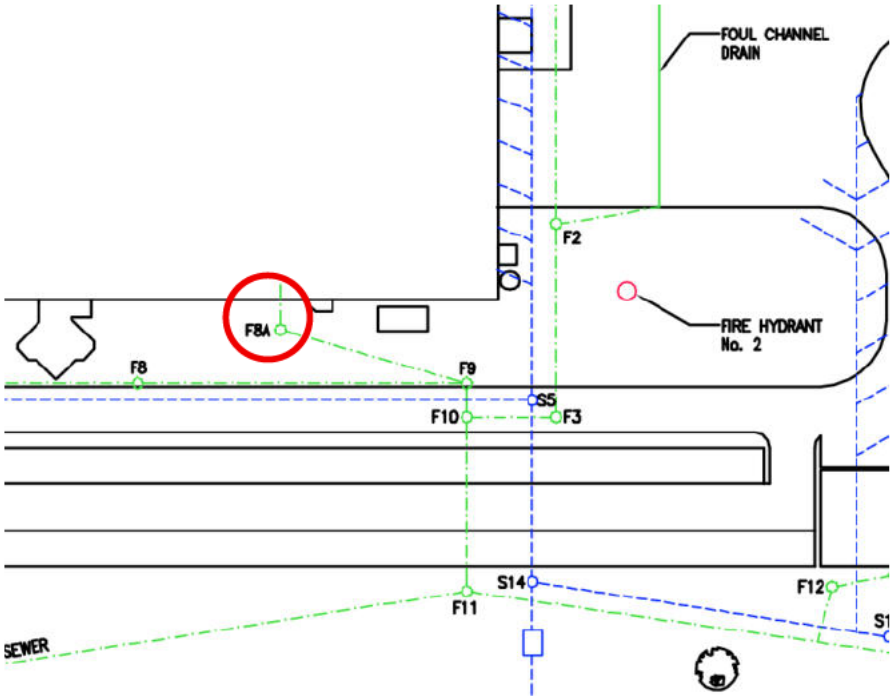
The existing Waste Management for the site is as per the image below;



For further information, refer to drawing AWF-TACP-SE-XX-DR-A-7008 which has been included in this submission.

4.11.1 Wastewater Treatment

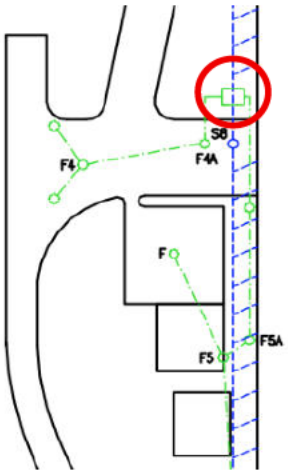
Wastewater is produced during the manufacturing process and there is currently equipment in place to clean/ treat the water before it is discharged into the foul drainage system. The efficacy of the existing equipment is proportionate to the scale of operations on site currently, however with the planned increase to production outputs, it will also be necessary to make improvements to the equipment for wastewater treatment, including new, larger diameter drainage pipes.







We understand that with the current arrangements, once treated, the wastewater discharges into the foul drainage system at the connection point F8A, circled in Red on the image above. The photos above to the right show the area on site where wastewater treatment is located.



The site also features an interceptor in the foul drainage system, which filters water runoff from the service yard to the West of the production building.

The purpose of the interceptor primarily is to catch any oil or other spills from the service yard to prevent contaminating the drainage network.

The box circled in Red in the image to the left highlights the location of the interceptor.

4.12 Site Capacity

4.12.1 Production output

Currently, the Wrexham Plant has the capacity to produce up to 2.2 billion cans per year. With the installation of a fifth production line, it would be possible to increase capacity by another 50 to 100%, with a projection of 3.3 to 4.5 billion cans produced per year, depending on the type of new equipment installed.

4.12.2 Storage and deliveries



The site receives regular deliveries of raw materials (aluminium coils in particular) and exports the finished aluminium cans. An increase to the production output will also result in a proportionate increase in the quantity of materials being stored on site as well as the frequency of deliveries to/from the site.

Consumption of the aluminium coils is expected to increase from a rate of 10 coils per day to up to 18 coils per day with the new equipment. As a minimum, additional storage space for the coils would need to be provided, and the service/ delivery yard will need to be able to accommodate the anticipated traffic.

The aluminium cans are manufactured in the Production building and stored in the adjacent Warehouse building. The finished cans are then loaded up at the loading bays to the rear of the Warehouse building for export.
The client has advised that current arrangements at the Warehouse provide capacity to accommodate the production of up to 3.8 billion cans per year, however in order to accommodate more than this (up to the maximum projected 4.5 billion cans per year), the addition of a third loading bay to the rear of the Warehouse would be necessary.

4.12.3 Staffing numbers

Existing staff numbers:

Production building staff:	210
Warehouse building staff:	16
Total staff employed:	226

Staff on site at any one time (due to shift patterns):

Production building:	80

Warehouse building:	5
Total staff on site:	85

Proposed staff numbers:
With the addition of a fifth production line, this will result in a requirement for additional staff on site.

It is projected that the overall staff numbers would need to increase from 226 by another 56/ 112 persons across both the Production and Warehouse buildings, depending on the size of new equipment installed and how this affects the rate of production output.

Proposed figures:

Production building staff:	260/ 310	(increase of 50/100)
Warehouse building staff:	22/ 28	(increase of 6/12)
Total staff employed:	282/ 338	(increase of 56/ 112)

Staff on site at any one time (due to shift patterns):

Production building:	90/ 100	(increase of 10/ 20)
Warehouse building:	11/ 16	(increase of 6/ 11)
Total staff on site:	101/ 116	(increase of 16/ 31)

These figures for proposed staff numbers should inform the design proposals for additional locker room/ welfare areas and any requirements for additional car parking.

4.13 Fire Strategy

Full details of the existing fire strategy for the site overall and for the individual buildings are yet to be provided.

4.14 Acoustics

An acoustic assessment has been undertaken for the site to ascertain the noise impact on nearby residential receptors due to the increased factory capacity.

The noise assessment, undertaken in accordance with TAN 11, BS4142 and BS8233 guidance, concludes that while predicted nighttime rating levels at the nearest residential receptors indicate an adverse impact, including a potentially significant adverse impact at one receptor, the increase in noise associated with the proposed additional facility capacity would have a negligible effect, increasing existing noise levels by less than 1dB. For further information, the assessment has been included in the submission.

5.0 Proposal Overview



Site Proposed - Key

1. Production Building
2. Warehouse Building
3. Site Entrance
4. Gate House
5. Lobby
6. Main Carpark
7. Overflow Parking
8. Warehouse Staff Parking
9. Loading Bays
10. Waiting Bays
11. Existing Sub station
12. Lacquer Tanks
13. Sprinkler Tank
14. Tunnel Link
15. Existing Annexe/Training Centre
16. New Auxiliary Building
17. Existing Chemical Tanks
18. Existing Ramp/Loading Bay
19. Existing redundant site access

Proposals :

A. Extension 1
B. Extension 2 (Coil Storage)
C. Extension 3
D. Extension 4 (Chemical Store)
E. Extension 5 (Locker Room)
F. Attenuation Tank Possible Locations
G. New Parking
H. Possible Additional Lacquer Tanks
I. Addition of 3rd Loading Bay
J. RTO Proposed Location
K. New Sewage Treatment Plant 3x12m
L. New Roof Canopy to the North of Extension 2.
M. Extension 6 - New Equipment Store
N. Extension 7 - New Compressor Room

The drawing above provides an overview of the proposed development.

The schedule of accommodation provides a summary of the proposals and their corresponding floor areas.

5.1.1 Schedule of Accommodation

	Proposal	**Area (sqm)**	**Comments**
A	Extension 1	540	
B	Extension 2	1537	
C	Extension 3	682	
D	Extension 4 (Chemical Store)	717	
E	Extension 5 (Locker Room)	340	Double storey extension
F	Attenuation Tank		Minimum 150m^3
G	New Parking		To suit new staff numbers
H	Lacquer Tanks		Increase to 4 40,000L tanks – Previously submitted application no. P/2026/0074
I	Third Loading Bay		
J	RTO		850sqm slab area, layout TBC
K	Sewage Treatment Plant		3x12m, installed underground
L	Roof Canopy to North Extension 2	196*	*Not enclosed space
M	Extension 6 (New Equipment Store)	174	
N	Extension 7 (New Compressor Room)	80	
	Total	**4070sqm**	

5.2 Proposed Internal GA Plan – Extension 1-7 (A/B/C/D/E/M/N)

After reviewing the stage 1 / 2 the image below shows an updated working drawing of the proposed arrangement for the internal layout of the Production building, factoring in the additional of the new fifth production line.

The layout shown below is to install the new production line to the north of the existing production area. This will allow all five production lines to be contained in the same area, with the existing accommodation being relocated into the proposed extensions. Some of the equipment / process is being relocated into the warehouse building, under the change of use application submitted, P/2026/0313.

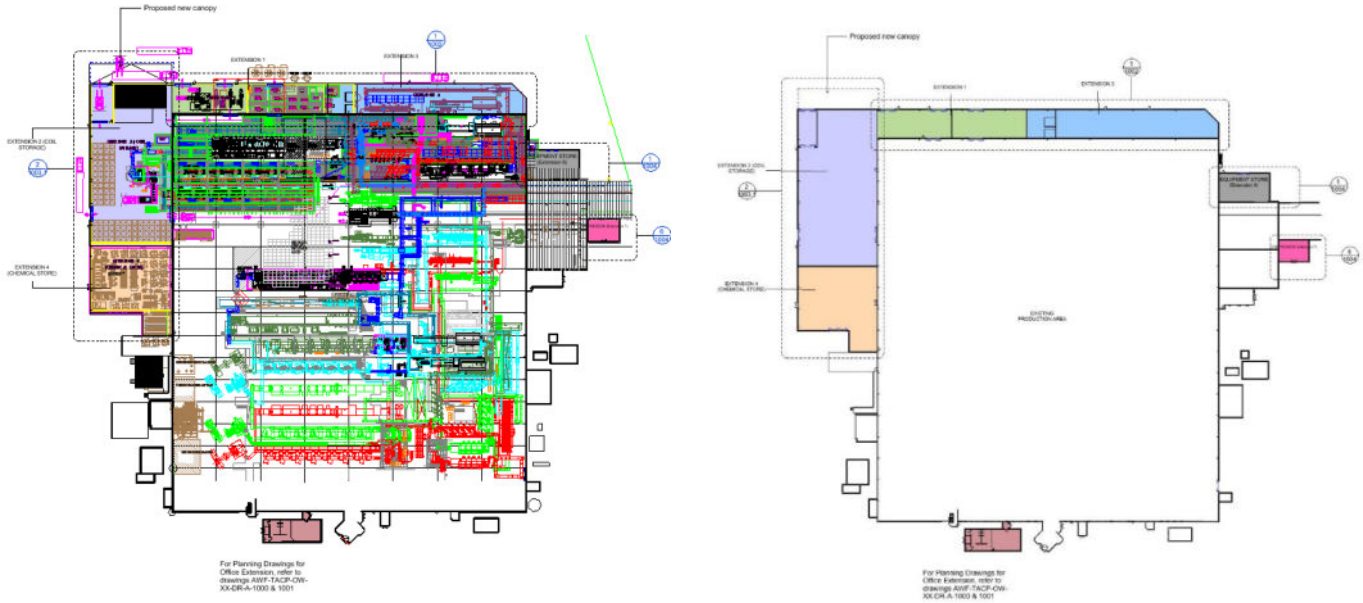
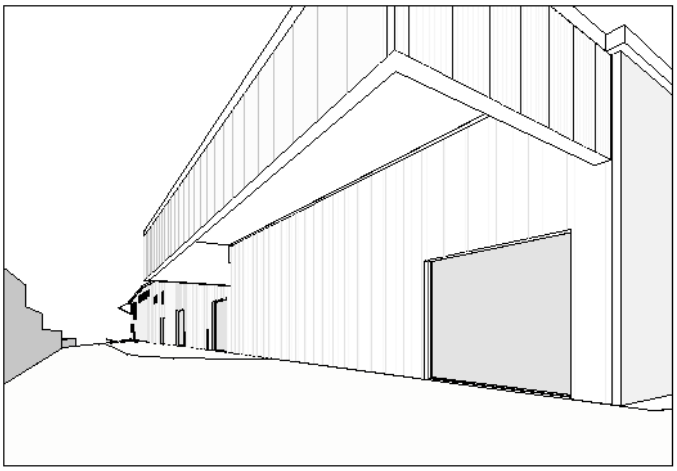


Image Left – Detailed Internal General Arrangement
Image Right – Production Building General Arrangement

Following a review of the Stage 1/2 design options for the extensions to the Production Building and associated service yard, the proposals have been further developed to incorporate a canopy to Extension 2 (shown in purple). The canopy has been introduced to provide weather protection for loading and unloading activities, thereby improving operational efficiency and supporting safer working conditions. It would help reduce the risk of slips and other weather-related health and safety issues during periods of adverse weather.

Further review of the Production Building proposals with the client has identified the need for further minor additions, including an equipment store extension (shown in dark grey) and a compressor room extension (shown in pink). The proposed equipment store would replace two smaller existing extensions that are to be removed, while the compressor room extension would form an addition to the existing tunnel link building.

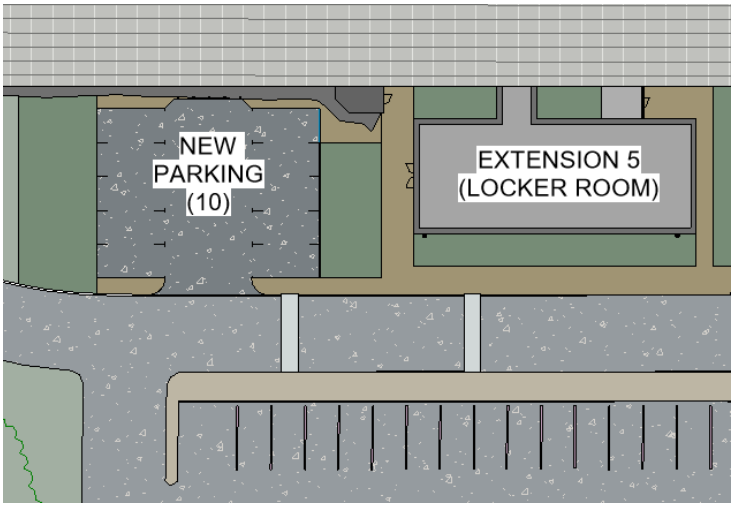


3D Perspective of proposed new canopy to Extension 2

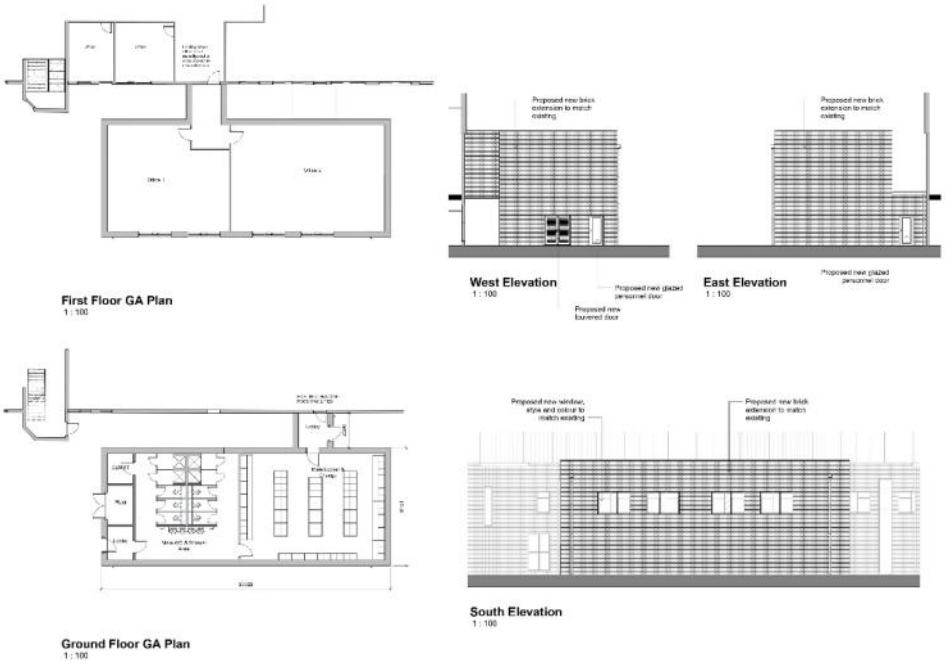
5.2.1 Locker Room / Welfare Extension – Extension 5 (E)

Due to the increase in staff numbers following the increase of production on site, it is necessary to provide an additional locker room, welfare facilities and offices at first floor.

We have identified the area shown in the image below as the site for an extension that would provide this accommodation. Due to the constrains on the site, the footprint of the extension as per the image below. There is scope to distribute this accommodation over two storeys.



Following a review of the design and discussions with the plant and client, we were able to come up with a design to provide a suitable area, that would provide a space for 100 new lockers.



Office, welfare and changing facilities extension
Drawing no; AWF-TACP-OW-XX-DR-A-1000

The above drawings show the two-storey new locker area, welfare facilities and offices at the first floor which link to the existing first floor office space. At ground level, the proposed new locker area links to the existing to create easy access to both areas.

The proposed office and welfare facilities have been carefully positioned away from the existing production building to preserve natural daylight and ventilation to the existing workspace. This approach also enables the retention of the existing building structure, minimising the extent of alterations required to the operational facility while ensuring the proposed development integrates effectively with the site layout and supports continued business operations.

5.3 Drainage / Water Attenuation

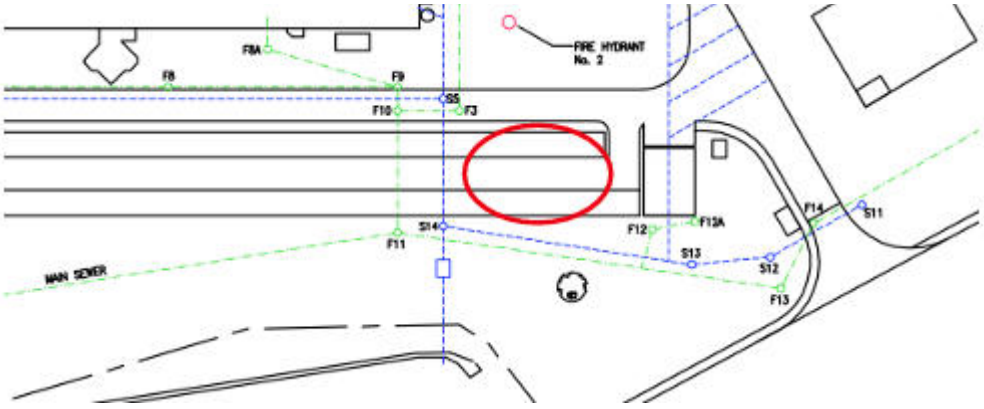
The scale of this development dictates the need to consider Sustainable Drainage Systems for the site. A primary consideration for sustainable drainage will be the inclusion of a Water Attenuation Tank, as a form of mitigation for an increase to the area of non-permeable surfaces.



The images to the right illustrate the proposed location of the water attenuation tank to the east of the main car park. Following an assessment of the site constraints and operational requirements, this area has been identified as the most appropriate and practical location for the installation of the attenuation infrastructure.

The proposed siting has been selected to minimise disruption to the ongoing operation of the facility during both the construction and operational phases. Furthermore, its proximity to the existing drainage network will facilitate efficient integration with the site's surface water management system, reducing the extent of new drainage connections required and ensuring the effective attenuation and controlled discharge of surface water runoff.

The schedule of accommodation provided in section 5.1.1 delineates 4,266sqm of new roof space. Early consultations with a Civil Engineer, refer to appendix for consultant provided an approximate size of 150m3 for a new attenuation tank that would suit the proposed areas, although this volume was based on an earlier figure of 3,500sqm of new roof space.



The image above highlights the identified location for a new Water Attenuation Tank that could provide attenuation for site-wide surface water drainage. Full details will need to be developed by an appointed Civil Engineer.

5.4 Lacquer Tanks

A recent planning permission (Ref. P/2026/0074) has been granted for the installation of four above-ground lacquer tanks, replacing the existing underground storage tank arrangement.

The location of the proposed concrete slab and associated tank installation has been carefully selected to ensure that it does not encroach upon areas containing existing Bee Orchids or conflict with the proposed landscaping scheme. The siting of the development has therefore been informed by both ecological and landscape considerations, enabling the retention and protection of these features while accommodating the operational requirements of the facility.

5.5 Warehouse Loading Bays

The existing warehouse requires a 3rd loading bay to be added to keep up with the output demand that will increase with the new production line. The annual output will be greater than 3.8 million cans, with this increase, an additional loading bay is required. The images below show the existing arrangement and the proposed arrangement showing the additional new loading bay.



Existing Warehouse Layout & Parking



Proposed Warehouse Layout & Parking

With the addition of the 3rd bay, the warehouse parking will be impacted, and it will reduce from 17 to 11, this is a loss of 6 parking spaces, and they have been found elsewhere on site, refer to Transport Assessment Statement for parking information, this will be submitted to support this application.

5.6 Thermal Oxidiser (RTO)



The image above shows the proposed location that has been identified on site for the installation of the new RTO. Refer to drawing *AWF-TACP-SE-XX-DR-A-7111-Proposed RTO* that has been included in this planning submission.

The proposed installation of a Regenerative Thermal Oxidiser (RTO) will support the site's environmental performance by providing a highly efficient air pollution control system. The RTO is designed to treat process emissions and odours by converting potentially harmful pollutants into carbon dioxide and water vapour before they are released into the atmosphere. Through the continuous recovery and reuse of heat generated during the treatment process, the system operates with a high level of energy efficiency. The technology is widely used within industrial and manufacturing environments to manage solvent-based and odorous emissions, helping to ensure that site operations are undertaken in an environmentally responsible manner. The RTO is a specialist designed element and the design will be developing during stage 4.

5.7 Sewage Treatment

Due to the known issue of excessive levels of phosphates in rivers in the Wrexham area (see advice from Matthew Phillips in the appendix of this document), it is recommended to include measures for the mitigation of wastewater in the proposed development. This is because the proposed development will result in an increase to the number of personnel working on site, and without mitigation, the development is likely to exceed the acceptable levels for the volume/ concentration of wastewater.

Our recommendation is to incorporate an on-site sewage treatment plant as a form of mitigation for the anticipated increase in the volume/ concentration of wastewater. Full details and specification for the design of wastewater treatment will need to be produced by an appointed Civil Engineer.

The Treatment Plants are typically installed underground, with the capping lid protruding above the surface, as shown in the image to the left. We are proposing a timber security fencing surrounding the sewage treatment and an alarm system will also usually need to be provided.

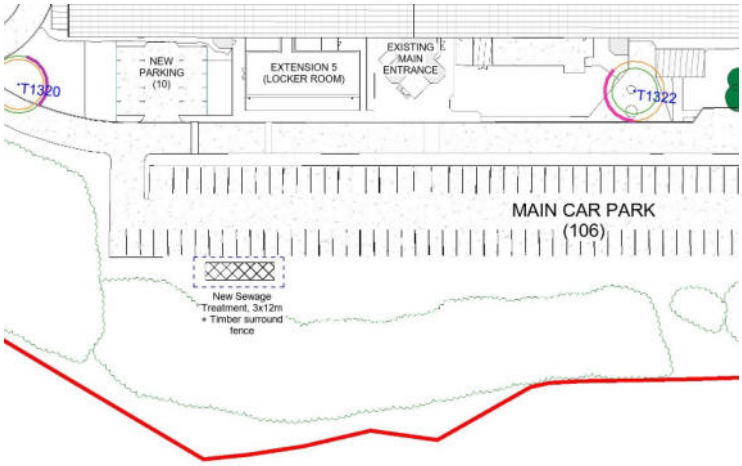


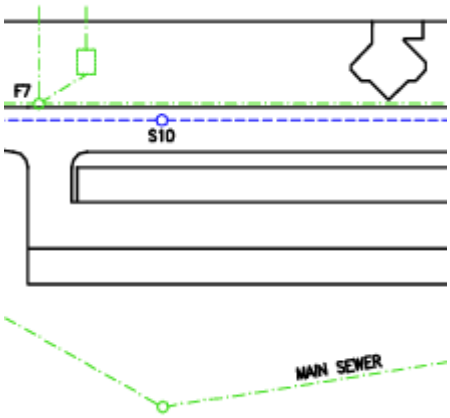


Image right; typical Klargester Sewage Treatment Plant.

Image left; of how the treatment plants typically look once installed.

The image below left is the proposed location site we have identified as a potential suitable location for the installation.





The image above right shows the existing foul drainage (green route on drainage plan), the proposed new sewage will be able to connect into. The plant will need to connect to the foul drainage route for the new toilets which will be in extension 5 (office, welfare and changing facilities). Subject to further detailed design by a Civil Engineer.

5.8 Roadway Extension

The proposed extensions to the north and west of the Production Building would occupy a substantial area currently comprising the existing one-way perimeter roadway and an associated earth bund. The roadway extension and retaining wall has been submitted to the Local Authority under the planning refer P/2026/0446.

Following a review of the Stage 1 and Stage 2 design options for the roadway extension required to serve the proposed developments at the northern and north-western corners of the Production Building, careful consideration was given to the site's environmental constraints, particularly the adjacent woodland areas to the side and rear of the building. The roadway alignment has therefore been designed to minimise impacts on the surrounding woodland and retain the existing landscape character.

As a result of this approach, the proposed roadway can be accommodated without the removal of any Category A or Category B trees, ensuring that the site's most significant Arboricultural assets are retained and protected as part of the development.

Where tree removal is required elsewhere within the site, a comprehensive replacement planting strategy is proposed. As outlined in Section 5.3.1.1, replacement trees will be planted to

compensate for those lost, with species, size and maturity selected to closely reflect the characteristics of the removed trees. This will help maintain the site's landscape quality, visual amenity and ecological value in the long term.

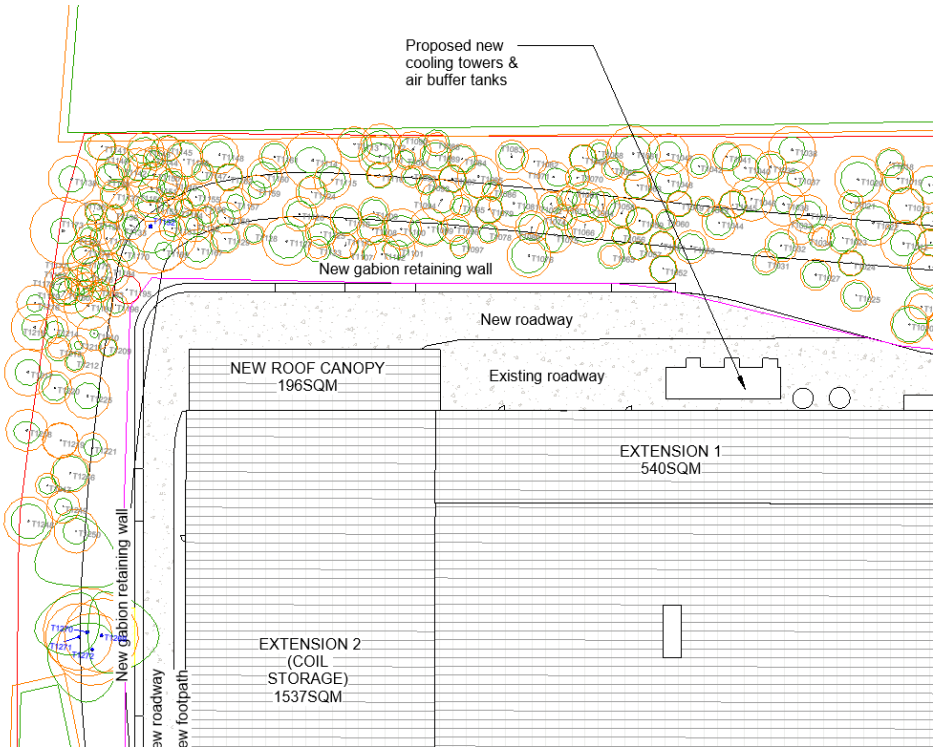


Image showing the new roadway extension

5.9 Gabion Retaining Wall

To facilitate the construction of the new roadway, a gabion retaining wall is proposed to provide structural support and stability to the retained earth bund. The wall will comprise galvanised wire-mesh baskets filled with natural stone, forming a robust and durable retaining structure capable of accommodating the site's level changes.

Gabion retaining walls offer several advantages in this location. Their flexible construction enables them to accommodate minor ground movement while maintaining structural integrity, making them particularly effective for slope stabilisation and erosion control. The open-faced nature of the stone-filled baskets also allows for natural drainage, reducing hydrostatic pressure behind the structure.

The proposed gabion wall is a low-maintenance solution, with weather-resistant materials that provide long-term durability and performance while preserving the character of the site's landscape features.



Example of a Gabion retaining wall design

The roadway extension and retaining wall has been submitted to the Local Authority under the planning refer P/2026/0446.

5.10 Tree Replanting

Following the updated tree survey and recommendations provided by Jon Brewin, Wrexham's Arboricultural Planning Officer (refer to appendix for this information), suitable areas within the site were identified for replacement tree planting. The extent of tree loss has increased because of the updated survey and a more detailed Arboricultural assessment. The number of trees that are to be removed for the works will be 102 total, the proposed landscaping layout have been revised to reflect the updated level of tree loss and the corresponding replacement planting proposed as part of the development.



It is recommended the type of trees that are to be replanted are a variety of the following;

- Silver Birch
- Wild Cherry
- Rowan
- Field Maple
- Scots Pine
- Common Holly
- Common Beech

The trees that are to be replanted are to be in a similar age and size as the trees that have been removed for the proposed works.

Removal or pruning of trees are to be undertaken in accordance with the Arboricultural Impact Assessment and Arboricultural Method Statement. We will be submitting all proposed measures for mitigation with the planning application, the Green Infrastructure Statement by Ecologist.

5.11 External Lighting

An indicative external lighting scheme has been produced, refer to drawing *AWF-TACP-PB-00-DR-A-1005-Proposed External Lighting.* The lighting scheme is to be developed by an M&E Engineer during stage 4 design.

6.0 Tree Felling

As highlighted in the Preliminary Ecological Assessment (PEA) by Cambrian Ecology, the felling of any trees on site should be carried out in two stages. This is to avoid the disruption of any birds or great-crested newts (GCN) that may be using the trees as a habitat.

From the beginning of November to the end of March marks the hibernation period for the Great-Crested Newts. The newts may hibernate within the root areas of trees, which means that trees should not be uprooted during this period.

From the beginning of March to the end of August is the nesting season for birds, where tree canopies will potentially be occupied by nesting birds, therefore any removal of tree canopies should be avoided during this period.

Consequently, the first stage of tree felling would be to remove the tree canopies outside of the bird nesting season, and then subsequently uproot the remains of the tree outside of the GCN hibernation period.

The construction programme included on the previous page has identified the period up to the end of February 2026 as the earliest opportunity for the canopy removal, with the removal of the rest of the tree structure between April and August 2026.

6.1. Licenses/ permissions for tree felling

Due to the substantial quantity of existing trees identified for removal, and the potential disturbance of wildlife, there are certain restrictions to what work can be carried out without prior approval. This is ultimately governed by National Resources Wales (NRW).

Prior approval by NRW would be required for any subtractive works to trees beyond incidental pruning/ removal of branches. This can be obtained by either:

1. Applying for a felling license directly with NRW, a process which can take up to 3 months, or,
2. Including proposals for the tree felling within a Planning application, submitted to the Local Authority. NRW would be consulted on the proposals and the necessary permission for tree felling would be included with the approval of the Planning application.

To commence any subtractive works to the trees prior to the start of the nesting season in March, our Arboriculturist suggested that the pruning and removal of branches could be done without any prior approval, since it would be considered as incidental works only. This would then prevent any birds from creating nests in those trees. The remainder of the tree structure could then be removed before the GCN hibernation period commences again in November, and once prior approval has been awarded from NRW.

It should be noted that specialist landscaping contractors Sherratt Group have advised that NRW may interpret the initial pruning/ removal of branches as a form of staged or preparatory felling. In such circumstances, NRW may find it necessary to take enforcement action against the client.

As also documented in Section 8 of this report, advice received from Matthew Phillips, the Local Authority's Head of Service for Planning Development Management, states that should any subtractive works be carried out to the existing trees prior to the submission of any Planning application, the condition of the trees presented in any supporting documents should be the original state of the trees as recorded in the tree survey dated 13/11/2025. This is to ensure that the impact to the ecological health of the site caused by the proposed building development can be sufficiently monitored, and any proposed remediation for the loss of trees can be considered in relation to their original state.

END OF DOCUMENT

TACPArchitects

Appendices

Appendix A – Consultation & Public Engagement

The proposed development meets the criteria to be classified as a Major Planning application, wherein a minimum 28-day period of public consultation will need to be conducted prior to the formal submission of the application to the Local Authority. Once formally submitted, the application will also be subject to a referral to the Local Authority's Planning Committee for additional review/ consultation beyond what is normally conducted for a Minor planning application.

Since we are still in the early stages of design development, only preliminary discussions with specific consultees have been carried out already. Findings from these discussions are summarised below:

- Jon Brewin, Arboricultural Planning Officer for Wrexham County Borough Council.
    - Jon Brewin was contacted for advice on the proposed development and the anticipated impact to existing trees. Initially he attended a site visit on 02 December 2025, where the outline proposal for the removal of trees to facilitate a building extension was agreed in principle.
        - Reinstatement/ re-planting of any trees lost would be required as part of the development and Jon recommended a full reinstatement of the area of tree canopy coverage, plus an additional 20% should be sufficient mitigation for this matter. This is based on targets included within the Local Development Plan for Wrexham Industrial Estate to enhance environmental features by 20%. The trees to be removed are also relatively low-quality and this would not justify enhancements in excess of the recommended 20%.
    - He was contacted for further advice on whether removing any of the existing trees without any prior approval from NRW would attract any objections from the Local Authority. He responded with the following advice:
        - *The trees subject to this proposal are not afforded statutory protection under either conservation area legislation or a tree preservation order. I see no objections to you completing the necessary tree work at your earliest convenience, obviously providing the tree work undertaken is in accordance with that as indicated on the plans attached and agreed in-principle during our site meeting (02/12/25).*
        - *Please ensure the project ecologist has no concerns regarding undertaking the tree work asap.*
- Matthew Phillips, Head of Service, Planning Development Management for Wrexham County Borough Council.
    - Matthew Phillips was contacted for advice on whether removing any of the existing trees without any prior approval from NRW would attract any objections from the Local Authority. He responded with the following advice:

- *In terms of the tree removal, this may result in the application attracting objections locally* [if] *these works take place before planning permission is granted – that would be a risk for the applicant to consider. Furthermore, PPW12 does advise again*[st] *pre-emptive site clearance which this would be. PPW12 also advises where pre-emptive clearance takes place, the ecological baseline for ecological mitigation and net benefit to biodiversity should be the situation that* [was] *existing beforehand. So any clearance that does take place prior to an application coming in would need to be clearly acknowledged in the tree and ecology reports and, the Green Infrastructure Statement and NBB scheme.*

  - He also offered the following comment with regards to the current anticipated timescales for a major planning application:
    - *Given that this would be a significant extension to an existing building, there would be the potentially for increased employees. That would increase foul water flows from the site and therefore would encounter the phosphorous issues that are causing significant delays to development across the board. It may therefore be difficult to turn this one around quickly.*
  - Matthew Phillips also advised the following with regards to the anticipated increase in employees on site:
    - *Given that this would be a significant extension to an existing building, there would be the potentially for increased employees. That would increase foul water flows from the site and therefore would encounter the phosphorous issues that are causing significant delays to development across the board.*
      - The presence of excessive levels of phosphates in rivers is unfortunately a prevalent issue in the Wrexham area, which has led to NRW publishing new targets for reducing river phosphate levels in special areas of conservation across Wales. Consequently this is having a significant impact on the Local Authority's ability to determine planning applications within normal timeframes, where the proposed development results in an increase to the volume or concentration of wastewater.
        - Further information on this issue can be found at: https://www.wrexham.gov.uk/service/development-plans-and-other-planning-policy/new-river-phosphate-level-targets
        - In order to avoid excessive delays to the determination of any planning applications, it is normally recommended to include measures for the mitigation of wastewater in any design proposals, in the form of on-site sewage treatment.

- JPS Civil Engineering was contacted for advice on outline proposals for SuDS features. The following comments were shared:
  - The proposed additional roof area is circa 3,500sqm.
  - In spite of any additional roof area, the proposed development would not significantly increase the amount of non-permeable hardstanding area on the site. This should mean that it would not be too great a challenge to resolve the drainage system to sufficiently accommodate any increase to the current flow rates caused by the proposed development.

- A minimum tank volume of 150m^3 for water attenuation should be incorporated into our proposals to sufficiently manage the additional levels of surface water drainage that would be generated from the increase in area of non-permeable surfaces.
- Reviewing the existing plans for surface water drainage on the site, it was noted that there does not appear to be any sustainable drainage features already implemented on site.
- JPS therefore recommended the proposed development should incorporate plans for the inclusion of a water attenuation tank that was strategically located so as to enhance drainage for the site as a whole.
    - The location identified for a new attenuation tank was to the East end of the main car park.
    - The tank should provide capacity for water attenuation to sufficiently serve the whole site. This would be greater than the minimum 150m^3 previously recommended, however there should still be sufficient area within the main car park to accommodate the required tank size.