# Land South of Bryn Lane, Wrexham Industrial Estate

## Planning Note

**Client: Mauna Kea Limited**

**Date: July 2026**

Carter Jonas

Classification L2 - Business Data

Carter Jonas

**Date: July 2026**

**Client: Mauna Kea Ltd**

**Contacts: Andy Cowan**

*The conclusions in this Report reflect Carter Jonas LLP's professional opinion at the time of writing, based on the scope and information available then. It does not account for any changes that may have occurred since.*

*You should be aware that the report is specific to the project and purpose for which we were engaged. It should not be used for other projects or variations, and any such use is at the user's own risk.*

*Information provided by the Client and third parties has been assumed accurate. While reasonable care was taken, Carter Jonas LLP accepts no liability for any errors or omissions resulting from incorrect data.*

*We would remind you that the report is intended for the Client's use under the agreed terms. If shared with authorities or third parties, we accept no liability for any reliance placed on it by others.*

| | | | |
|---|---|---|---|
| **Project Ref:** | | | |
| **Status:** | | | |
| **Issue/Rev:** | A | | |
| **Date:** | July 2026 | | |
| **Prepared by:** | Andy Cowan | | |
| **Checked by:** | Harry Bolton | | |

Bloc,
17 Marble Street,
Manchester,
M2 3AW

T: 0113 242 5155

## CONTENTS


| | | |
|---|---|---|
| 1. | INTRODUCTION | 4 |
| 2. | POLICY CONTEXT | 5 |
| 3. | TECHNICAL RESPONSE | 9 |
| 4. | CONCLUSION | 14 |




Classification L2 - Business Data

# 1. INTRODUCTION

1.1 This report has been prepared by Carter Jonas on behalf of Mauna Kea Limited to provide further information to support the approach to off-site ecology mitigation. The Site is Land South of Byrn Lane, Wrexham, covering a development site area of 3.68ha with a planning application reference of P/2025/0143.

1.2 It should be noted that at least part of the Site can be considered previously developed land. As noted in the submitted Heritage Statement, the proposed development site changed in use from agriculture to industrial use during the mid-20th century. The site was part of the extensive Royal Ordnance Factory facility and housed a factory as part of prior its closure in 1945. The Heritage Statement notes that there was a factory on site until at least 1982 but this was removed from the site by 1992.

1.3 The Proposed Development will deliver of a warehouse unit comprising 14,564 sq. m of floorspace for B2 (general industrial) and/or B8 (storage and distribution) with B1(a) (ancillary office space). The Site is allocated for employment development within the Wrexham Unitary Development Plan (2005) ("UDP"). It will provide in the region of 238 to 405 FTE jobs. The development of the Site (located within a designated employment area) will require the loss of semi-natural grassland which comprises common species, with ecology surveys finding no protected species.

1.4 The overall strategy has been to provide 45% of the development site area (3.68ha) as ecology land, noting precedent elsewhere within the Wrexham Industrial Estate ("WIE"). This is split between an on-site provision (1.18ha) and an off-site provision (0.5ha) within the approved Strategic Ecology Corridor (P/2025/0431). This means that c. 68% of the development site area is given over to development and c. 32% is given over to ecology.

1.5 Wrexham County Borough Council ("WCBC") confirmed that a range of overall percentage provisions for ecology land versus development site area have been agreed on schemes within the WIE.

1.6 However, noting that c. 68% of the development site area is given over to development uses, WCBC require further information on why the Proposed Development should not achieve their suggested split of 50% / 50% between development and green / ecology land (i.e. 1.84ha for each). This would support justifying the proposed off-site mitigation being acceptable in policy terms.



Classification L2 - Business Data

# 2. POLICY CONTEXT

### Planning Policy Wales (Edition 12) Stepwise

2.1 Planning Policy Wales (PPW) (along with Future Wales) sets the national planning framework for Wales, establishing (between them) the national spatial strategy for growth and setting out primary national land use and development management policies.

2.2 PPW 12 establishes 5 key Planning Principles for the planning system. These are:

a. Growing the economy in a sustainable manner;

b. Making best use of resources;

c. Facilitating accessible and healthy environments;

d. Creating and sustaining communities; and

e. Maximising environmental protection and limiting environmental impact.

2.3 PPW12 promotes the goals of the well-being of the Future Generations Act which seeks to promote; prosperity, economic resilience, health, equality, cultural vibrancy and global responsibility.

2.4 PPW12 fully recognises and supports the necessity to ensure that sufficient employment land is delivered 'to meet the needs and requirements of a range of future employment scenarios' and advises that wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration.

2.5 However, PPW also recognises the role that distinctive and natural places plays in delivering sustainable placemaking outcomes.

2.6 With regard to the loss of ecological features, PPW states that his will only be permitted where it would achieve significant and clearly defined public benefits (as identified within TAN 23).

2.7 PPW advises that where ecological features are removed as part of a proposed scheme, planning authorities must first follow the step-wise approach as set out in paragraph 6.4.15 (detailed below). Where loss is unavoidable, PPW states that developers will be required to provide compensatory planting (which is proportionate to the proposed loss as identified through an assessment of green infrastructure value including biodiversity, landscape value and carbon capture).

2.8 PPW paragraph 6.4.11 advises that planning authorities must follow a step-wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, the minimised, mitigated and as a last resort compensated for.



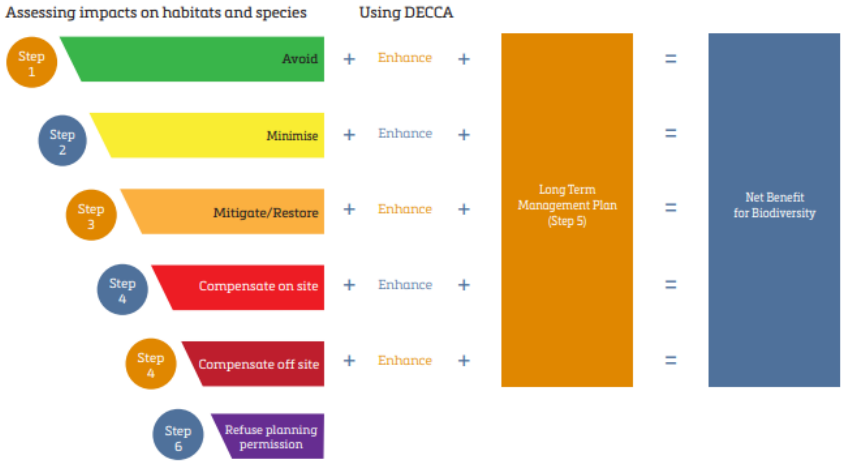
Classification L2 - Business Data

2.9 This Paragraph goes on to state that enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.

2.10 Further to this, Paragraph 6.4.13 advises that improving ecosystem resilience, particularly improving connectivity to the immediate surroundings (in line with the DECCA Framework) would be a key contribution to on-site avoidance, minimisation and mitigation strategies and enhancement and that applicants should demonstrate how a development would improve the attributes of resilience as far as this is reasonably practical.

2.11 This is summarised in the diagram below:

Figure 12: Summary of the Step-Wise Approach




### Technical Advice Note 23 – Economic Development (2014)

2.12 Technical Advie Notes (TANs) are authoritative guidance documents which provide detailed technical advice to developers, planners and building conservation professionals, however, are not considered to be adopted policy.

2.13 TAN 23 provides guidance on the role of land use planning in generating wealth, jobs and income. It aims to ensure that planning decisions are made in a sustainable way that balances social, environmental an economic considerations. The note emphasises the importance of recognising the whole-economy contribution to economic growth and the need to plan for traditional employment uses (Class B) as well as other economic land uses such as retail, tourism and public services.

2.14 The guidance set out in TAN 23 operates in conjunction with the overarching principles contained in Chapter 7 of PPW, together they highlight the need to balance economic growth with social and environmental objectives.



Classification L2 - Business Data

2.15 Chapter 3 of the TAN 23 provides advice in respect of articulating economic benefits associated with economic development.

2.16 Paragraph 2.15 advises that where a planning authority is considering a site allocation or planning application that could cause harm to the environment or social cohesion, it should ask three questions in order to help clarity and balance the economic, social and environmental issues:

a. Are there alternative sites?
b. How many jobs will be accommodated as part of the development?
c. Would the development make any special contribution to wider policy objectives?

**Wrexham Local Plan Guidance Note 29: Wrexham Industrial Estate**

2.17 Local Planning Guidance Note 29 is one of a series of local planning guidance notes which amplifies policies in the adopted Wrexham Unitary Development Plan (UDP) and supplementary planning guidance in the Wrexham Local Biodiversity Action Plan (2022) and Local Planning Guidance Note 26: 'Landscape & Industrial Development'.

2.18 The Guidance Note is a material consideration when the Council makes decisions on Planning Applications. The guidance advises developers/landowners on the key ecological issues that they need to address before carrying out any development on the Wrexham Industrial Estate and whether or not planning permission is required.

2.19 The Guidance Note recognises that the Wrexham Industrial Estate is essential in fostering economic growth and prosperity within the County Borough. It also notes that the Estate contains an important network of wildlife habitats that support a diverse range of animals and plants which help make the Estate an attractive place to work and which contribute to the quality of life of people within the County Borough.

2.20 Many of the species and habitats within the Industrial Estate are protected by UK/EU Legislation such as the River Dee Bala Lake / Afon Dyfrdwy a Llyn Tegid SAC, which places a clear responsibility on developers/landowners to avoid harming them and a duty on the Council to promote biodiversity in exercising its functions.

2.21 Guidance Note 29 emphasises:

- The need for an ecological assessment of the Site;
- The protection of habitats that are found in preference to mitigation or off-site compensation; and
- The protection of the developable area of a Site from colonisation by species.

2.22 Paragraph 6.7 of the Guidance Note states where adverse effects on habitats are unavoidable, they should be minimised. Following on from this, paragraph 6.8 states in providing mitigation or



Classification L2 - Business Data

compensation an equivalent area of land must be provided, unless it can be demonstrated that a smaller area of better quality would enhance the ecology of the Site or the wider area.

2.23 The Guidance Note states in paragraph 6.9 that the Council will generally not support the complete removal of protected species and habitats from development sites within the Industrial Estate. This is because it's viewed as being both harmful to the extent and diversity of the network of wildlife habitats present.

2.24 Paragraph 6.10 of the Guidance Note goes on to recognise that off-site provision may be appropriate as a last resort, where the developer provides expert evidence demonstrating that:

- Relocation of the habitats/species from the Site will enhance the nature conservation status of the species and the network of habitats as a whole;
- On-site compensation is impossible (e.g. due to the restricted size of the Site, economic viability or unusual decontamination requirements);
- Compensation would be provided within 250m of the habitat lost, in order to facilitate migration of affected species and to preserve the overall network of wildlife habitats;
- An equivalent area of land is provided, unless it can be demonstrated that a smaller, better quality habitat would enhance the ecology of the area; and
- Habitat corridors and buffer strips to hard development are provided within the original Site to help maintain the network of habitats.



Classification L2 - Business Data

# 3. TECHNICAL RESPONSE

### Future occupier

3.1 The Applicant's current objective is to occupy the building themselves with a manufacturing and/or storage use to support their wider operations, noting that equipment needs may change over time and having a large space to accommodate a range of plant is important to support business continuity.

3.2 Similarly, the building has also been designed to accommodate a logistics use. The modern logistics warehouse is increasingly technology focused. High-reach automated cranes and sophisticated warehouse management systems are being utilised to maximise storage capacity. Certain manufacturing pallet racking systems exceed heights of 40 metres, although various systems reach lower heights more consummate with the Proposed Development, and these are becoming more common, reflecting the broader trend of increasing warehouse heights and capacities.

3.3 Ultimately, the size of the building (and therefore, supporting car parking and internal roads, etc) has been influenced been the Applicant's business need in mind. It has also been designed to be flexible, ensuring that a wide range of occupiers would be interested in the development.

### The site's contribution to employment land requirements

3.4 Regardless of future occupier, delivering 68% of the Site for development uses versus the Council's suggestion of 50% should be considered appropriate. The Site is allocated within the UDP for employment uses, highlighting the Site's importance in achieving the Council's growth aspirations.

3.5 This is amplified by the Employment Land Review (2015) ("the Review") and the most recent Employment Land Monitoring Report (2025) ("the 2025 Monitoring Report"). The Review estimated a growth level of some 4200 jobs between 2013 and 2028, equating to an employment land requirement of approximately 45 hectares, or 3 hectares per year.

3.6 Background Paper 7: Employment Land – produced as part of the former LDP examination - notes that the WIE is a nationally important employment area and is also important in the context of the local economy. The majority of employment land take up in Wrexham since 2006 has been on the Wrexham Industrial Estate.

3.7 The same paper noted that land available within the WIE consisted of smaller plots, which imposes a limit on the size of businesses that can be accommodated. Having a sufficient range in size of vacant plots was identified as important in order to provide land to help retain local businesses seeking to expend and to attract new businesses to the area.



Classification L2 - Business Data

3.8 The 2025 Monitoring Report found that a total of 53.579ha of employment land completions had taken place over the 2013-2025 period, or an average of approximately 4.5ha per year, demonstrating a stronger demand for employment land than envisaged by the Review.

3.9 The 2025 Monitoring Report also demonstrates strong demand for land on the WIE. Over the 2013-2025, 43.37ha of employment land completions took place on the Wrexham Industrial Estate, or nearly 81% of all employment land developed. In terms of the remaining supply of employment land, 67% of this comes from sites on the WIE.

3.10 The Site forms part of the Council's realistic employment land supply, noting that the 2025 Monitoring Report concluded that (excluding Land North of Byrn Lane / KSS3) this was 31.30ha. The same report confirms that the Site could provide 3.30ha, therefore representing almost 10% of total remaining supply across Wrexham.

3.11 This also demonstrates that finding alternate sites where reduced impacts cannot be achieved is not possible or practical. There are few allocated employment sites – where growth should be directed – remaining. This is also supported by WCBC's Employment Land Review and 2025 Monitoring Report which confirm the strategic importance of the WIE to Wrexham's economy, being the preferred location for occupiers over the past decade. The Site will generate much needed supply in the WIE, allowing for the attraction of high-value, high-skill businesses who gravitate towards this location.

3.12 A reduction in the developed area to 50% would inevitably reduce the amount of employment floorspace that can be accommodated and therefore the number of jobs that could be generated. It would mean that employment gain from one of the remaining sites within Wrexham's realistic employment land supply would not be maximised.

3.13 Overall, this is contrary to policy objectives on employment growth through the Site's allocation in the UDP and commitments in Future Wales. The withdrawn LDP and its evidence base specifically mentions the need for vacant plots of varying sizes to come forward. Noting the Site is one of the few remaining plots within the Council's realistic employment supply, it is important that this contributes fully to economic growth.

### The Site's contribution to ecology

3.14 Paragraph 1.3 of this note explains the strategy for providing an appropriate amount of ecology mitigation land. The Planning Statement and post-submission discussions between the Council and the Applicant provide further justification about this being appropriate. A total of 84 new trees are provided, compared to 2 lost, and 159 linear metres of new hedgerow is proposed, with no existing hedgerows lost across the Site. There are no existing wildlife ponds on site and, through the Proposed Development, a new wildlife pond will be installed on site.



Classification L2 - Business Data

3.15 Whilst withdrawn, the LDP proposed that the majority of the Site be given over to employment use. The Proposed Development delivers on the then policy requirement to deliver part of the WIE Strategic Ecological Network. This has driven the amount of on-site green space provision, alongside further provision at the northern boundary. Notably, the UDP allocated the entire site for employment uses so there is a high degree of continuity between the LDP and UDP in this regard.

3.16 The approach to on-site green space enhances connections beyond the site, notably into wider ecology land within the WIE (as outlined in the withdrawn LDP for the WIE Strategic Ecological Network). The provision of an additional wildlife pond and other features to support the growth in population of Great Crested Newts supports this.

3.17 Importantly, the off-site area for Land South significantly improves this despite being impacted by a constraint by overhead wires which restrict what can be delivered on the land below. Within the 0.5ha allocated for Land South, an additional eight trees and a further wildlife pond will be provided. This will be alongside amphibian hibernacula and offset native thicket mix. This land is directly adjacent to an existing hedgerow which will be retained, offering a complementary environment for Great Crested Newts to migrate to during hibernation season.

3.18 In addition, this forms part of the wider parcel of land which will provide six wildlife ponds (alongside an existing pond), an additional 33 trees, and native scrub / thicket. The Strategic Ecology Corridor as a whole will deliver 170 new trees, 37 new ponds, and 305m of new hedgerows. It will also complement investment made by FI Real Estate for their own mitigation land which is located adjacent. Ultimately, delivering the off-site mitigation for Land South forms part of a strategy to create a new wildlife corridor which allows connection into existing ecology areas in the WIE but is protected from some of the conflicts with employments uses.

3.19 Achieving 50% of the development site area for ecology land would require an additional 0.66ha. This equates to 18% of the development site area. However, this would not create a better ecological environment than the current approach. This is because any additional land would likely be used to increase the width of the eastern and southern boundaries, complementing the overall strategy to create a strong boundary that relates to the withdrawn LDP Strategic Ecological Network. The additional land would mean the site provides an above policy provision in this regard.

3.20 A wider boundary is not preferable in this location because it increases separation from the adjacent ecology areas within the WIE, noting this is dense woodland which is inaccessible by the public and a haven for wildlife. The preferred function of the south and eastern boundaries is to create a safe but attractive habitat to encourage movement, rather than an expanse of land which may – for example – be utilised by planting but be less useful for supporting migration or ranging. This is considered appropriate for the Site's context; however, both elements can be accommodated in the Strategic Ecology Corridor.



Classification L2 - Business Data

3.21 Various alternate designs have already been considered by the Applicant and presented within the Design and Access Statement. Options were tested prior to the submission, notably the initial sketch features buildings across the site and other changes adjusted the entrance to minimise impacts on trees. The most recent drawings shared post-submission show further reduction in footprint.

3.22 As noted previously, the Applicant considers that the proposed development is in line with LPGN29 and especially the provisions which make off-site mitigation appropriate:

| | |
|---|---|
| relocation of habitat/species from the site will enhance the nature conservation status of the species and the network of habitats as a whole, and | No Great Crested Newts were found on site, therefore nothing to relocate. The Applicant is providing a new, on-site wildlife pond which enhance the nature conservation status of the species. The proposals will facilitate part delivery of the Strategic Ecology corridor, is strategic investment in ecology provision for the WIE which will clearly enhance the nature conservation status of the species and the network of habitats as a whole. |
| on-site compensation is impossible (e.g. due to the restricted size of the site, economic viability or unusual decontamination requirements), and | The proposals on-site ecology provision is focused on the southern and eastern boundaries of the site. These corridors blend into other ecology land within the WIE. This provision is considered appropriate in the context that the site must also accommodate employment generating uses which are supported in this location. This is especially noting provisions within TAN23, the UDP, and Future Wales. As noted above, there are ecological reasons for why an increased area for ecology land on-site may not be preferrable in this location. |
| compensation would be provided within 250m of the habitat lost, in order to facilitate migration of affected species and to preserve the overall network of wildlife habitats, and | No Great Crested Newts were found on site and the lost habitat is simply grassland which is a common species. The on-site provision preserves and enhances the existing network of wildlife habitats within the WIE.<br><br>The Proposed Development will support delivery of the Strategic Ecology Corridor, a completely new network of wildlife habitat which doesn't exist currently and is adjacent to the Wrexham Industrial Estate's existing ecology network. |
| an equivalent area of land is provided, unless it can be | Noting precedent elsewhere in the Industrial Estate, an equivalent area of land is provided on-site and off-site within the Strategic |



Classification L2 - Business Data

| | |
|---|---|
| demonstrated that a smaller, better-quality habitat would enhance the ecology of the area, and | Ecology Corridor. As noted above, an increase in on-site provision to include 50% of development site area may not be preferable and comprise delivering a better-quality habitat on-site and off-site<br><br>Regardless of what 'an equivalent area of land' comprises, the on-site provision represents an enhancement to ecology in the area, noting the site's currently just grassland and has been used for agriculture in the past. Notably, a new wildlife pond is provided which enhances habitat for Great Crested Newts<br><br>The allocation for Land South within the Strategic Ecology Corridor also represents higher quality ecology land than the application site and would enhance the ecology of the area (noting this is currently agricultural land and will form part of a wider ecology corridor). |
| habitat corridors and buffer strips to hard development are provided within the original site to help maintain the network of habitats | There is a clear landscape boundary around the site, tying in with other ecology land in the WIE and specifically supports maintaining a network of habitats. |



Classification L2 - Business Data

# 4. CONCLUSION

4.1 The Applicant has proposed to deliver 45% of development site area as ecology land, in line with the approach taken on the 'Kingmoor' scheme. WCBC notes that a range of different percentages for ecology provision have been deemed appropriate in the WIE.

4.2 TAN23 requires support of economic development where policy is met. The Proposed Development will generate between 205-438 jobs (FTE) in operation and, especially noting the Site's location in the WIE which is the driving force of the Wrexham economy plus its allocation in the UDP for such uses, there are no preferable alternate sites. The scheme's special merit is linked to the above: developing a long-term, vacant plot within the WIE – which is at least partially previously developed land – will ensure that high-value, high-skill businesses have an increased range commercial property options to consider for growth or relocation. In addition, there is a scenario there the Proposed Development is occupied by the Applicant who are an internationally significant online retailer with aspirations to grow and become more self-sufficient in terms of their manufacturing and logistic capabilities.

4.3 PPW explains the Stepwise approach. This has been covered at length in the Planning Statement and in dialogue with the Planning Department during determination. The scheme has sought to minimise any loss of ecology – respecting policy in the withdrawn LDP to deliver a contribution to the WIE Strategic Ecology Network and, through design evolution, rejecting site alignments which required more of the site to be developed and seeking to minimise impact on trees at the Site's access. The Stepwise hierarchy has been followed with an appropriate amount of on-site ecology mitigation provided – including the addition of a new wildlife pond and trees – which relates strongly to adjacent ecology land within the WIE. A residual amount off-site ecology mitigation is provided in the Applicant's Strategic Ecology Corridor, contributing to a generational investment in ecology within the WIE and creating a new habitat network.

4.4 LPG29 sets out criteria to be considered when establishing whether off-site mitigation is appropriate. One of these is that 'an equivalent area of land is provided'. The Council's view is that an 'equivalent provision' equates to 50% of the development site area. This report considers implications if the Applicant were to meet this threshold.

4.5 Clearly, it would reduce the amount of developable area and therefore the potential for job creation. As an allocated employment site and one of the few remaining sites within the Council's realistic employment supply, it is vital that its economic potential is not curtailed. This is especially noting its prominent location within the WIE and that it has been vacant since at least 2005 (if not 1992) when the Site was originally allocated in the UDP. As above, there are no appropriate alternate sites and the Applicant considers that the provisions within Future Wales and TAN 23 (Economic Development) support the scheme.



Classification L2 - Business Data

4.6 In addition, this may not be preferable from an ecological perspective. The Proposed Development will facilitate partial delivery of the Strategic Ecology Corridor. The land allocated for Land South will include a new pond, trees, and complement an existing hedgerow which is located adjacent. It forms part of a wider strategic corridor which will deliver a generational change in ecological provision in the WIE. This would not be delivered if the Council's threshold is required.

4.7 Furthermore, an increase in on-site provision would likely mean an increase in width of the southern and eastern boundaries, noting the strategy to focus green space in these locations. The Site can best support ecology in the WIE through providing a high quality and safe boundary to facilitate movement of fauna. This is especially its adjacency to existing ecology land in the form of dense woodland which will be a haven for wildlife. Simply increasing the amount of land in these locations, creating more expansive corridor and encouraging fauna away from this dense woodland, may be counterproductive to meeting this objective.

4.8 Overall, the Applicant considers that the amount of on-site ecology land is appropriate for the Site, especially noting that part of this constitutes previously developed land, and represents an enhancement on the existing context. This represents a superior solution than meeting the Council's suggested on-site ecology land provision of 50% and is in line with policy relating to both employment and ecology. This should be sufficient to gain support of WCBC and for the application to be determined positively.



Classification L2 - Business Data

