Caulmert Limited

Engineering, Environmental & Planning Consultancy Services

Household Recycling Centre, Wrexham Recycling Park, Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT

FCC Environment

Full planning permission for the removal of existing reuse shop and offices and erection of replacement modular reuse shop

Planning and Design & Access Statement

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TABLE OF CONTENTS

1.0 INTRODUCTION 1

1.1 Background 1
1.2 Supporting Documents 1

2.0 SITE LOCATION AND SURROUNDING LAND USE 2

2.2 Surrounding Area 2

3.0 PLANNING HISTORY 3

4.0 THE PROPOSED DEVELOPMENT 5

4.1 Use and Amount 5
4.2 Scale 5
4.3 Layout and Appearance 6
4.4 Access and Parking 6

5.0 PLANNING POLICY CONTEXT 7

5.1 National Planning Policy 7
5.2 Technical Advice Notes 8
5.3 The Development Plan 9
5.4 The Local Development Plan 9

6.0 THE WASTE HIERARCHY AND THE CIRCULAR ECONOMY 11

6.1 The Waste Hierarchy 11
6.2 The Circular Economy 11

7.0 PLANNING CONSIDERATIONS 13

7.1 Principle 13
7.2 Operational Matters 13
7.3 Design and Access 13

8.0 CONCLUSION 14

1.0 INTRODUCTION

1.1 Background

1.1.1 This Statement has been prepared on behalf of FCC Environment ("FCC"), to accompany a full planning application for the removal of existing reuse shop and offices and erection of replacement modular reuse shop at the Household Recycling Centre, Wrexham Recycling Park, Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT ("the site").

1.1.2 The preparation of this Statement has been instructed by FCC; and is solely for the use of FCC in support of their application and is to be used for no other purpose; or by any other individual or organisation.

1.1.3 FCC Environment currently operates a reuse shop at the Bryn Lane HWRC offering goods recovered from waste streams deposited by visitors to the HWRC. Items include:

- Furniture including chairs, tables, shelving and storage to homewares including crockery and glassware;
- Electrical items – TVs and DVD players, to games consoles and kettles;
- Sports equipment from bikes and golf clubs to ice-skates and bowling balls;
- Gardening equipment, pots and ornaments;
- Kids toys and games; and
- Books, CDs, DVDs and LPs.

1.1.4 All proceeds from the sales go to the Nightingale House Hospice charity.

1.1.5 The exiting reuse shop and office prefabricated building was opened in 2016 and has reached its 'end of life'; it is now proposed to replace the building with a single storey reuse shop.

1.2 Supporting Documents

1.2.1 In addition to this statement, the planning application is supported by the following suite of documents:

- Site Plan – 157A041 Rev B; and
- Elevations and Floor Plan - 0229-WRB-DD-01-DR-AR-002-P04
- Plan Layout - 0229-WRB-DD-01-DR-AR-001-P01

1.2.2 Additional documents that also accompany the submission:

- Green Infrastructure Statement (Caulmert).

2.0 SITE LOCATION AND SURROUNDING LAND USE

2.1.1 The site is rectangular in shape and is located within the existing Wrexham Recycling Centre adjacent to the southern boundary. It is currently occupied by a two storey modular building which comprises the existing reuse shop on the ground floor and offices on the first floor. An existing external display area is located within the site along with storage containers and staff parking.

2.1.2 The application site is approximately 545m^2 in area.

2.1.3 The site is bound on the north by an existing palisade fence with the Household Waste Recycling Centre (HWRC) access road beyond. To east is hard standing and the southern boundary is formed by a palisade fence and HWRC access road. To the west are existing storage containers

2.1.4 The site is located some 4km east of Wrexham and has access to the wider highway network via Bryn Lane, Industrial Estate Road then onto the A534. No changes are proposed to the existing site access or internal access and circulation roads.

2.2 Surrounding Area

2.2.1 The immediate surrounding area is typified by unmanaged scrub land and trees with the wider Wrexham Industrial Estate beyond which comprises over 300 businesses.

3.0 PLANNING HISTORY

3.1.1 A search of the publicly available planning documents from 2005 on Wrexham Councils website reveals the following planning history for the site

3.1.2 Of relevance to this application, there are two recent applications that have been granted at the site – Table 1 denotes.

Table 1 – Planning History

Application Reference	Description of Development	Decision	Date of Decision
P/2007/0694	Development of a Recycling Facility, In-Vessel Composting Facility, Waste Transfer Station, Office and Education Facility, Weighbridge, Weighbridge Office, Bulking Bays, Tool Store, Fuel Tank, Access Road, Entrance Signs, Surface Water Lagoon, Ponds and other ancillary development.	Approved	7 August 2007
P/2008/0672	Fire Suppression Tank and Pump House	Approved	8 August 2008
P/2011/0769	Development and operation of a mechanical/biological treatment facility including a road sweepings processing facility, ancillary offices and welfare facility	Approved	23 January 2012
P/2015/0049	Application for non-material amendment to planning permission code no p/2011/0769 to provide small extension to east side of existing building (5m wide x 5m high and 3m deep)	Approved	10 February 2015
P/2015/0600	Replacement of existing office unit with erection of two-storey modular building and use of ground floor for	Approved	24 September 2015

	retail purposes (re-cycled items from adjacent site) and first floor offices / mess facilities in connection with household recycling centre		
P/2016/0368	Variation of condition no 17 of planning permission p/2011/0769 to extend operating hours of mechanical biological treatment facility to 0600 to 2200 hours Monday to Sunday	Approved	25 July 2016

4.0 THE PROPOSED DEVELOPMENT

4.1 Use and Amount

4.1.1 The proposals comprise a single storey prefabricated building with canopy comprising the following:

- Sales area;
- Office/Testing Room
- Kitchenette/Canteen;
- Education Room; and
- Female, Male and Accessible WC.

4.1.2 It is important to clarify that the proposed reuse shop is not a retail development in the conventional sense. The facility will operate as part of the HWRC supporting the recovery and redistribution of items diverted from the municipal waste stream.

4.1.3 Items offered within the reuse shop will be exclusively goods recovered from waste streams deposited by visitors to the HWRC. These items — which may include furniture, household goods, tools, books, and similar material — will be assessed, sorted and set aside for reuse rather than being deposited as residual waste or recycling. This represents direct application of the reuse tier of the waste hierarchy, preventing the downgrading or disposal of materials that retain functional value.

4.1.4 The facility will not procure or trade new goods, nor will it function as a commercial retail enterprise. Its purpose is to provide a facility at which goods recovered from the waste stream can be made available for sale and reuse by members of the public, thereby extending the useful life of those materials and reducing the volume of waste requiring further treatment or disposal.

4.2 Scale

4.2.1 The proposed building will be approximately 21m in length and 9.6m in width. With regard to height, the proposal will be flat roofed with a maximum height of 3.3m in height. The proposed canopy will extend to 6m from the end of the building and there will be an accessibility ramp extending 10.7m, also from the end of the building.

4.2.2 Internally, the floor space of the individual rooms is as follows:

- Sales area – 120m^2;
- Office/Testing Room – 8m^2;
- Kitchenette/Canteen – 17m^2; and
- Education Room – 12m^2.

4.3 Layout and Appearance

4.3.1 The proposed reuse shop will be located in the same location as the existing two storey building and there will be storage containers and small car park used by the staff.

4.3.2 Regarding the external finish of the proposed reuse shop this will comprise the following:

- Walls & Skirt: Plastisol steel - Goosewing Grey BS 10A05;
- Fascia: Plastisol steel - Anthracite RAL 7016
- Windows: uPVC frames - wrapped in Anthracite RAL 7016 (white internally)
- Doors: Steel c/w vision panels - Anthracite RAL 7016
- Entrance Canopy: Goosewing Grey BS 10A05 ppc finish solid side walls with a mono-pitched galvanised; and
- steel frame roof finished in Anthracite RAL 7016 c/w polycarbonate panel coverings.

4.4 Access and Parking

4.4.1 No alterations are proposed to the main access or circulation space within the HWRC.

4.4.2 The existing car parking area will be reduced in size and there will be 1no staff parking bay.

5.0 PLANNING POLICY CONTEXT

5.1 National Planning Policy

Future Wales: The National Plan 2040

5.1.1 Future Wales – the National Plan 2040 ("Future Wales") was published in February 2021 and is the national development framework, setting the direction for development in Wales to 2040. It is a statutory Development Plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well- being of our communities.

5.1.2 Future Wales is a spatial plan, which sets a direction for investing in infrastructure and development for the greater good of Wales and its people. It sets the challenge of delivering these improvements to the public, private and third sectors. It makes clear the importance of planning new infrastructure and development in such a way that they are complementary rather than competing priorities, ensuring opportunities are maximised and multiple benefits are achieved.

5.1.3 As the national development framework, Future Wales is the highest tier of Development Plan and is focused on solutions to issues and challenges at a national scale.

5.1.4 Future Wales' spatial strategy is a guiding framework indicating where large scale change and nationally important developments will be focused over the next 20 years. The strategy blends the existing settlement patterns and the distribution of jobs and homes with a vision of managing change and future trends for the benefit of everyone in Wales.

5.1.5 The plan makes clear the importance of delivering infrastructure in a complementary and integrated manner, maximising multiple benefits. The proposed reuse shop, as part of a county-wide network of reuse facilities, represents an investment in waste infrastructure that delivers environmental, community and economic benefits aligned with Future Wales principles.

Planning Policy Wales - Edition 12

5.1.6 Planning Policy Wales (Edition 12, February 2024, as amended on the 19th July 2024) (the "PPW") provides the overarching policy context and guidance for planning within Wales. It states that the primary objective is to "*ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places.*"

5.1.7 Chapter 5 of PPW addresses the natural environment and waste, including section 5.13 on Sustainable Waste Management Facilities.

5.1.8 PPW Paragraph 5.13.3 confirms that planning authorities must support the provision and suitable location of a wide ranging and diverse waste infrastructure. The extent to which a proposal contributes to the waste management objectives stated within national waste policy is a material planning consideration.

5.1.9 PPW Paragraph 5.13.13 identifies that there will be a shift over time from the disposal of materials to the circulation of materials within society, and that waste management facilities will therefore need to be built to support high efficiency and high-quality reuse and recycling. The proposed development directly responds to this objective by providing a dedicated reuse facility at an existing WRC, facilitating the circulation of recovered materials within the local community.

5.1.10 PPW also references the Collections, Infrastructure and Markets (CIM) Sector Plan, which indicates a move toward a reduction in disposal and recovery and an increase in focus on high-volume source-segregated collection, as well as preparation for reuse and prevention. The proposed reuse shop aligns precisely with this direction of travel.

5.1.11 PPW Chapter 3 (Distinctive and Natural Places) and Chapter 6 (Unique Places) further support development that contributes to sustainable communities. The proposed reuse facility supports this by delivering environmental and community benefits through waste reduction within an established industrial setting.

5.2 Technical Advice Notes

5.2.1 Technical Advice Note (TAN) 21: Waste (2017) provides detailed national guidance on the consideration of waste management proposals within the Welsh planning system. TAN 21 must be read alongside PPW and is a material consideration in the determination of this application.

5.2.2 TAN 21 places significant weight on the waste hierarchy as a framework for decision-making. The hierarchy, derived from the Waste Framework Directive (2008/98/EC) and enshrined in Welsh waste policy, prioritises waste management interventions in the following order: prevention, reuse, recycling, recovery, and disposal. Reuse, the direct function of the proposed facility occupies the second highest tier of the hierarchy, above recycling, and represents one of the most resource-efficient outcomes for materials diverted from the waste stream.

5.2.3 TAN 21 sets out locational criteria for waste management development. It identifies that waste management facilities should be located where they can be effectively integrated with other waste management activity. The proposed reuse shop is to be located directly adjacent to an existing WRC, the operational context of which it directly supports. This represents a highly appropriate and functional location for the facility.

5.2.4 TAN 21 also identifies that development plans should make suitable provision for waste management facilities and that proposals that are consistent with national waste strategy objectives should be viewed favourably. The proposed development is consistent with these objectives.

5.3 The Development Plan

5.3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 establishes that if regard is to be had to the development plan for any determination under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

5.3.2 PPW sets out that a plan-led approach is the most effective way to secure sustainable development through the planning system and that up-to-date development plans set the context for rational and consistent decision making.

5.4 The Local Development Plan

5.4.1 The adopted Development Plan for Wrexham County Borough Council is made up of the *Wrexham Unitary Development Plan 1996-2011* (the 'UDP') which was adopted in 2005. The UDP forms part of the statutory development plan alongside *Future Wales: The National Plan 2024*.

5.4.2 As per the adopted Proposals Map, the site sits within the defined 'Settlement Limits' and is allocated as an Employment site (Policy E1 7).

5.4.3 UPD Strategic Polic PS10 States that '*Priority in waste management will be given to minimising the volume of waste generated, followed by maximising the re-use and recycling as much waste as possible*'.

5.4.4 UDP Policy MW12 states that '*Waste management facilities will be located having regard to:*

a) the best practicable environmental option;
b) the waste hierarchy;
c) the proximity principle.
d) regional self-sufficiency.

With the exception of landfilling, windrow composting or small-scale collection and recycling points, facilities for sorting, transferring and processing of waste will be permitted within sites on general industrial estates'.

5.4.5 Other relevant UDP policies are:

- GDP1: Development Objectives; and
- S8: Shopping Development within Defined Employment Areas.

5.4.6 **Policy GDP1:** Development Objectives, which sets out the General Development Principles against which all new development will be assessed.

6.0 THE WASTE HIERARCHY AND THE CIRCULAR ECONOMY

6.1 The Waste Hierarchy

6.1.1 The waste hierarchy is a fundamental principle of waste management law and policy in Wales. It is enshrined in the Waste (England and Wales) Regulations 2011 (as amended), which transpose the requirements of the EU Waste Framework Directive 2008/98/EC, and is reflected throughout national waste policy including PPW Edition 12 and TAN 21. The hierarchy establishes the following order of preference for the management of waste:

- Prevention - reducing the quantity of waste generated.
- Preparing for reuse - checking, cleaning, repairing, or refurbishing items so they can be reused.
- Recycling - processing waste materials into products or substances.
- Other recovery - including energy recovery from waste.
- Disposal - including landfill, representing the least preferred option.

6.1.2 The proposed reuse shop operates at the second highest level of the waste hierarchy: preparing for reuse. By facilitating the recovery of functional items from waste deposited at the HWRC and making those items available for redistribution, the facility directly prevents the downgrading of reusable materials to lower-value waste management processes. This reduces overall waste arisings, conserves the embodied resources within goods, and avoids the environmental costs associated with recycling, recovery and disposal.

6.1.3 Welsh Government's waste strategy, including the Towards Zero Waste strategy (2010) and the More Than Recycling ambition, places explicit priority on reuse as a key tool in meeting national waste reduction targets. The proposed reuse shop contributes directly to the achievement of these targets at the local authority level.

6.2 The Circular Economy

6.2.1 The circular economy provides the broader strategic context within which the proposed development is set. A circular economy is one in which products and materials are kept in use for as long as possible, with maximum value extracted before recovery or disposal. It represents a departure from the traditional linear 'take, make, dispose' model of resource consumption.

6.2.2 PPW Edition 12 acknowledges the shift towards the circulation of materials within society and frames the evolution of waste management infrastructure as a critical enabler of that transition. TAN 21 similarly supports waste management development that enables higher-quality and higher-efficiency reuse, in line with circular economy principles.

6.2.3 The proposed reuse shop embodies circular economy principles by:

- Intercepting items of continuing value at the point of deposit at the HWRC, preventing their entry into lower-value waste streams.
- Returning those items to productive use within the local community through resale at the facility.
- Reducing demand for the manufacture of new goods by increasing the availability of affordable reused items.
- Supporting awareness of reuse as a behavioural norm, with community benefit.
- Forming part of a wider county-wide network of reuse facilities that collectively create a significant infrastructure for circular material flows across Wrexham.

7.0 PLANNING CONSIDERATIONS

7.1 Principle

7.1.1 The application site is located within an established industrial estate, directly within an operating HWRC. The proposed use, a waste management reuse facility, is consistent with and complementary to the existing waste management function of the HWRC.

7.1.2 Given it is a replacement for an existing reuse shop It does not introduce a fundamentally different land use to the location and will not generate impacts beyond those already associated with the existing reuse shop and HWRC operation.

7.1.3 The proposal is supported in principle by national policy (PPW Edition 12 and TAN 21) and consistent with the waste management objectives of the LDP. The proposal directly advances the waste hierarchy and circular economy objectives embedded in Welsh Government policy.

7.2 Operational Matters

7.2.1 The proposed reuse shop will not operate independently of the HWRC, and its public opening hours will be Monday to Saturday 9am until 4:45pm corresponding with the existing reuse shop opening hours but separate from the HWRC operational hours. This ensures that the development does not create standalone traffic or operational impacts beyond those already present.

7.2.2 The layout has been designed to ensure clear separation between public, staff, and servicing areas, and to avoid conflict with existing HWRC site operations.

7.3 Design and Access

7.3.1 The proposed modular building is of a simple, functional design appropriate to the industrial character of the Wrexham Industrial Estate. The building's scale, massing, materials, and form are consistent with surrounding industrial units.

7.3.2 DDA-compliant access is provided to the building.

8.0 CONCLUSION

8.1.1 This application seeks full planning permission from Wrexham County Borough Council for the removal of existing reuse shop and offices and erection of replacement modular reuse shop at the Household Recycling Centre, Wrexham Recycling Park, Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT.

8.1.2 The facility will exclusively handle items recovered from waste streams deposited by visitors to the HWRC. It will be operated by an appointed reuse shop operator and will only be open to the public Monday to Saturday 9am until 4:45pm. The users of the facility will primarily be existing HWRC visitors, and no additional traffic generation is anticipated above the existing conditions.

8.1.3 The proposal directly advances the waste hierarchy by facilitating the reuse of recovered items, preventing their entry into lower-value waste management processes. It supports circular economy principles by keeping materials in productive use within the local community and is consistent with Welsh Government's waste strategy objectives, including the national ambition to increase reuse and reduce reliance on disposal.

8.1.4 The proposal is consistent with the relevant planning policy framework, including:

- Planning Policy Wales Edition 12;
- Technical Advice Note 21: Waste (February 2017); and
- The Wrexham Unitary Development Plan.

8.1.5 For the reasons set out in this statement, it is respectfully submitted that the proposed development represents sustainable development in accordance with national and local planning policy and should be approved.