

BRIDGEWAY CENTRE, WREXHAM INSUTRIAL ESTATE

Planning application to Wrexham Council for New Business Park

Planning Statement

FI Real Estate Management Ltd

DRAFT

SEPTEMBER 2021

DOCUMENT REFERENCE: FI003_02 VER 2



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1 EXECUTIVE SUMMARY

- 1.1 FI Real Estate Management is applying for planning permission to redevelop the Bridgeway Centre, located within Wrexham Industrial Estate. The proposed development is for a contemporary styled employment/business park, which will include a range of main blocks split into smaller units, with dedicated car parking and servicing facilities, accessed off Bridge Road. The proposed development, through the main blocks (Blocks C to J) and the units they support, has been designed to be occupied and operated by a wide range of businesses and enterprises.
- 1.2 The existing retail block (Block B) located off Coed Aben Road will be retained and refurbished, with an option for a future additional unit (Block A). Block A does not form a part of this planning application and will be considered at a future date.
- 1.3 The application site is previously developed land and like the wider industrial estate is in use for industrial development with exception of the small parade of shops / services (Block B). Many of the existing buildings date from the 1940s and are outdated, and comprehensive redevelopment is required to provide a range of new, modern industrial units to meet the needs of a range of industrial occupiers.
- 1.4 It is considered the site location and profile is not only eminently suitable for industrial and employment development generally but it is particularly suited for multi-unit developments as proposed. The applicant, FI Real Estate Management, has considerable experience of this type of development including at Wrexham Industrial Estate where it owns and operates a number of other sites of this nature.
- 1.5 FI Real Estate Management intends to develop the proposal in phases to allow existing tenants to relocate either within the development into new units or to be relocated elsewhere in the Estate to units also within the control of the applicant. This means there is no disruption to existing business and existing employment opportunities are retained.
- 1.6 The proposed development will provide a net increase in floorspace and units than presently available. This means additional employment opportunities will be created, supporting more jobs and growing the local economy. Units will be available on a range of flexible leases to encourage new enterprises and to support the growth and expansion of businesses.

- 1.7 It is considered the proposed development will be a tremendous asset to Wrexham Industrial Estate, and Wrexham generally, and would add considerably to the assets of this regionally important centre for employment.
- 1.8 In planning policy terms the site is located within the defined area of Wrexham Industrial Estate. The site can be regarded as appropriate for the form and profile of development proposed under the planning application. Surrounding the site is a mix of industrial and employment developments and also a large prison. Further to the southwest, separated and well screened from the site, is a small residential area. Accordingly, in land use terms the site's context is developed and mainly industrial and commercial in profile and is very typical of estates of this ilk.
- 1.9 The site is allocated for industrial / business use in the adopted development plan, the *Wrexham Unitary Development Plan*, and in the emerging *Wrexham Local Development Plan* which is expected to be adopted later in 2021 – potentially before this application is determined. The proposed development is compliant in principle to the land use designation in both adopted and emerging plans. The planning application also accords with national planning policy in *Planning Policy Wales* and related *Technical Advice Notes* as set out in this Statement.
- 1.10 In addition, the planning application can be regarded as acceptable by reference to its impacts and effects on the local road network (transportation considerations), biodiversity and ecology (bats), amenity of existing uses including residential (noise), ground conditions, flood risk and by reference to all other usual planning and land use considerations and can also be regarded as according with related planning policies of the above referenced adopted and emerging Local Plans.
- 1.11 Overall, the planning application for the proposed development can be regarded as acceptable in planning terms including by reference to usual planning policy and general planning and land use considerations. Accordingly, the planning application can and should be granted.

2 INTRODUCTION

- 2.1 This planning statement (“statement”) has been prepared by Plan Red on behalf of FI Real Estate Management Ltd (“FIREM”) in support of its proposed hybrid planning application to Wrexham Council for detailed and outline planning permission for new employment development, circulation, revised access arrangements, ecology mitigation and ancillary development (“proposed development”) at the Bridgeway Centre off Bridge Road at Wrexham Industrial Estate, Wrexham, LL13 9QS (“application site”).
- 2.2 It is proposed to make the planning application in the near future. At this stage the statement is being used to support required formal pre-submission consultation on the draft planning application.
- 2.3 The statutory requirement to carry out pre-submission consultation is imposed by section 61Z of the *Town and Country Planning Act 1990*. Further provision is contained in Part 1A of the *Town and Country Planning (Development Management Procedure) (Wales) Order 2012* (the “Order”). Guidance was also provided by the Welsh Government in the ‘New Development Management Procedures’ letter issued in February 2016. In this instance consultation is required because the nature and scale of the proposed development means it falls within the category of ‘major development’ as set out in the Order.
- 2.4 The statement is to be read in conjunction with documents that deal with other planning and land use related topics also to be submitted in support of the planning application.
- 2.5 The draft planning application package being consulted on comprises the following items:
- Drawings pack (by MCAU)
 - Design and access statement (by MCAU)
 - Planning statement (by Plan Red)
 - Employment land statement (by FIREM & Plan Red)
 - Transport report (by Prime Transportation)
 - Green travel plan (in transport report (by Prime Transportation))
 - Ecology statement (by UES)
 - Flood risk assessment & Drainage statement (by Barnsley Marshall)

- Ground condition report (by Sutcliffe)

2.6 The scope of the statement is as follows:

- Section 3 sets out background on the applicants and also the reasons for the planning application.
- Section 4 sets out feedback provided on the proposed development through the council's applicant pre-application consultation service
- Section 5 describes the application site and its immediate vicinity.
- Section 6 describes the proposed development.
- Section 7 sets out the planning framework applying to the application site.
- Section 8 summarises information set out in the FIREM and Plan Red employment land report on employment land and property in the district and also local market conditions along with demand for the proposed units covered under the planning application.
- Section 9 sets out our planning assessment of the proposed development and the case in support of the planning application.
- Section 10 sets out conclusions on the matters addressed by the statement.

3 BACKGROUND ON PLANNING APPLICATION

About the Applicant

- 3.1 FIREM was established almost 40 years ago. It provides workspace, asset and property management services. It is also an experienced developer and this is becoming an increasingly important activity. Many of its development related schemes and initiatives once developed and completed are then added to its diverse investment portfolio, which includes industrial, office, retail and residential premises.
- 3.2 FIREM's main guiding principle is that every property related intervention and action creates the opportunity to create better quality floorspace and buildings and generate value. Its property development arm was established to focus on creating places of quality and distinction, that offer opportunity and through an approach defined by a commitment to excellence.
- 3.3 Its team specialises in large-scale single use or mixed-use developments, using their planning experience to bring together a strong supply chain of consultants and contractors to deliver projects of every type and size.
- 3.4 As a responsible developer, FIREM works closely with its partners, communities and authorities to ensure a cohesive and quality approach is taken to all of its projects.
- 3.5 FIREM currently asset and property manages' many thousands of square metres of industrial property and floorspace and is adding to this monthly through new developments and acquisitions.

Reason for Current Proposals

- 3.6 A key objective of the emerging development plan for the site, *Wrexham Local Development Plan* ("WLDP") covered in detail in Section 7 is to support a vibrant, diverse and competitive local economy and one that provides a range of job opportunities to enable new and existing businesses to grow and develop in Wrexham. Accordingly, it is imperative that the council and owners and suppliers of industrial and employment land and premises for leasing, including FIREM, provide the Borough with an adequate supply of high quality serviced land and premises to accommodate projected growth and demand from would be tenants, while allowing choice and flexibility to meet the varying nature of future employment needs and demands.



- 3.7 This emerging policy is emphasised in the Council's *Economic Prosperity Strategy* (2012-2017). This recognises the need for the Council and related partners, which we would say includes the likes of FIREM, to intervene to guide the direction and development of the local economy. The Strategy also confirms the Council's commitment to securing an adequate supply, and in the correct locations, of the right land and buildings to attract high quality employment uses and opportunities and in the most sustainable and accessible locations. The Strategy does acknowledge that it will not just be the Council that will be providing the right land and buildings etc. hence the relevance of this to organisations like FIREM that specialise in providing high quality employment units/floorspace for leasing.
- 3.8 Accordingly, developments like those currently being contemplated by FIREM, are needed to accommodate the jobs growth estimate and allow for flexibility, competition and choice by potential occupiers by ensuring a range of available sites and premises, suitable for different employment uses and businesses in varying locations throughout the Borough, are available. Ideally, these should be located in sustainable locations like Wrexham Industrial Estate.
- 3.9 As has already been confirmed, albeit briefly, the existing premises/floorspace at the site were built many years ago, and when this took place they were designed and intended to serve very different needs and purposes to those they are currently put to. The limitations of the existing floorspace impact significantly on commercial interest in them when occupiers leave and leases are up for reassignment. In terms of quality they can be regarded as generally providing poor quality, non-modern, not fit for purpose floorspace. This has impacted on interest in the units, actual take up and resultant rentals achieved.
- 3.10 A point acknowledged in the strategy and experienced by FIREM is that there is a recognised and continued strong demand for land and premises in the Wrexham Industrial Estate, ("WIE") – approximately 80% of the employment land take up in the Borough since 2006 has been on land within WIE. Existing and emerging planning policy in Wrexham UDP and LDP respectively, including WLDP Policy EMP1, support the protection and making best use of land already allocated for and in use for employment purposes.
- 3.11 As traditional employment uses tend to generate lower land values than some other uses, e.g., housing or retail (in recent past), there can be pressure for employment land to be lost to these uses, which can be difficult to replace. While some existing sites which may



not have a reasonable prospect of being used for economic development can be de-allocated, planning policy seeks to safeguard existing and identified future employment sites for employment use. FIREM is conscious of this point, and this is one of the drivers for it wanting to redevelop the existing floorspace at the site. This will not only keep the site in employment use but it will be in a form that makes it attractive to occupiers, makes it flexible in terms of future/ongoing use and makes it viable from FIREM's perspective.

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4 PRE-APPLICATION ADVICE

- 4.1 Following an application on behalf of FIREM in late 2020, pre-application advice on the proposed development was provided by the Council in April 2021. The key points provided are set out here.

Development Plan policies/local planning guidance:

Wrexham Unitary Development Plan adopted 14/2/2005.

The site lies within settlement limits for Wrexham Industrial estate.

Relevant Policies:

- PS1 Settlement limits
- PS2 Environmental Impacts
- PS11 Biodiversity GDP1 Development Principles
- T8 Parking
- S4 Large-scale retail development
- EC4 Trees EC6 Biodiversity
- EC13 Surface water run-off
- E4 Employment development within settlement limits

Relevant Local Planning Guidance Notes

- 15 Cycling
- 16 Parking standards
- 17 Trees and development
- 23 Contamination
- 26 Landscaping and employment development
- 29 Biodiversity and employment
- 32 Biodiversity

The Wrexham Local Development Plan was subject to examination commencing Autumn 2019 and is likely to proceed to adoption in 2021.

Please also refer to Welsh Assembly Government's Planning Policy Wales (PPW11) Edition 11, and all relevant Technical Advice Notes.

Community Council contact details:

Community Council: Abenbury

Relevant Planning History:

The following reference numbers have been found, and details can be provided if required:

- P/2004/0900
- P/2000/0460
- P/2000/0594
- P/2004/1335 CB01459
- P/2012/0557
- P/2019/0248
- P/2019/0247

Constraints (within or close to the site):

- Low risk Coal Consultation area

Infrastructure contribution requirements and suggested 'Heads of Terms' for legal obligations:

- Not applicable

Validation requirements:

Validation information for planning applications and fees are set by the Planning Portal.
https://www.planningportal.co.uk/wales_en/.

This proposal would require additional information as follows:

- Landscape scheme

- Drainage scheme
- Tree report
- Archaeology report
- Ecology report

Views of officer:

Principle of the development:

The site is within settlement limits and employment development would comply with broad planning policies which seek to confine development to existing settlements with a good range of services. The provision of a drive-through restaurant could be seen as competing with town centre uses and would require special justification to show that it is in accordance with planning policy including TAN4 and PPW11.

Design and layout:

The development would result in the loss of open land fronting Bridge Road and Coed Aben Road and would be contrary to the guidance set out in LPGN26. This is of value for amenity and ecological reasons.

Trees:

The proposal may affect trees on the south-east and east sides and a tree report would be required.

Ecology:

The comments from Natural Resources Wales are attached. Comments from the council's ecology officer will be forwarded.

Archaeology:

The comments of the Clwyd-Powys Archaeological Trust are attached.

Highway safety:

Comments have been requested from the highway authority and will be forwarded.



Contamination:

Comments from the Council's Contaminated land officer are attached.

Drainage:

Comments from the Council's drainage officer, NRW and Welsh Water are attached. Advice on Sustainable drainage is available from our website:

[tps://www.wrexham.gov.uk/english/planning_portal/sab/sab.htm](https://www.wrexham.gov.uk/english/planning_portal/sab/sab.htm) or by contacting the SAB Team directly at SAB@wrexham.gov.uk.

Building Regulations:

Your scheme will require Building Regulation approval.

Conclusion:

The principle of an employment development is acceptable subject to the issues set out above and outstanding consultation replies, but there are concerns with the proposed A3 use and the loss of open land adjoining the road. These comments are made without prejudice to any formal decisions of the Local Planning Authority.

5 PLANNING APPLICATION SITE

- 5.1 We recommend consideration of relevant plans contained in the draft DAS by MCAU when reading this section of the statement as they provide useful context.

Address and Location

- 5.2 The Bridgeway Centre's address is Bridgeway Centre, Bridge Road, Wrexham Industrial Estate, Wrexham, LL13 9QS.
- 5.3 The location of the site is as shown in Figure 1.

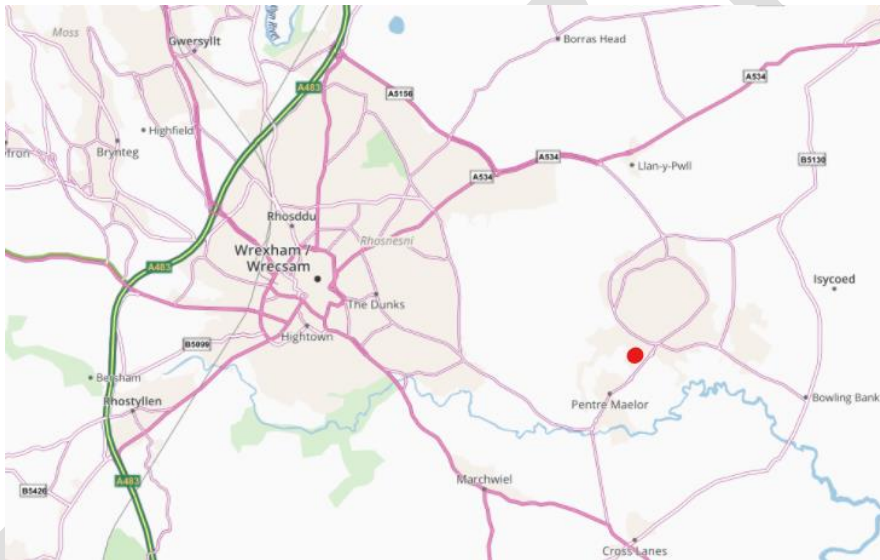


Figure 1: Wrexham Industrial Estate and Bridgeway Centre Location

- 5.4 The extent of the site, i.e., red line boundary is as shown on the plan at Figure 2 (paragraph 6.7).

Size and Floorspace

- 5.5 The application site extends to approximately 3.4 ha (8.4 acres). It currently accommodates some 9 blocks of development used for employment purposes. In total they provide (3,481 sqm (37,470 sqft) GIA floorspace. In addition, there is Block B which is used for retailing purposes. This provides some 615 sqm (6,618 sqft) GIA floorspace.

Context

- 5.6 The site is located roughly south west of the heart of WIE which is a well-known and defined major industrial zone some 4 km (2.5 miles) from the town centre of Wrexham.
- 5.7 WIE was developed during World War II as munitions factory. Post war the estate was transformed from a military site to a peacetime facility for industrial and employment uses. Then businesses mainly used the site's stock of existing buildings. Reflecting the needs of modern industrial and commerce most of the original buildings have been redeveloped and newer stock introduced.
- 5.8 WIE has now grown to cover approximately 550 hectares (1,359 acres) and is the largest industrial estate in Wales, second in the UK after Trafford Park, and one of the largest industrial estates in Europe. It supports around 300 businesses, providing employment for approximately 8,000 people. The estate consists of standalone industrial sites, industrial estates and business parks.
- 5.9 In addition, the estate is the location of the UK's largest prison, HM Prison Berwyn. This opened in 2017 and is directly to the south east of the site.

Site Profile

- 5.10 The site is currently partly developed by a group of now dated, poor quality, mismatched, single storey in height industrial units with surface car parking set in a loose layout of landscaped grounds.
- 5.11 Currently the site comprises:
- 9 blocks for employment use – combined floorspace 3,481 sqm / 37,470 sqft GIA
 - 1 block for retail use (Block B) – combined floorspace 674 sqm / 7,254 sqft GIA
- 5.12 The photographs that follow (© Google Street Views) illustrate the existing buildings on site.



Photograph 1: Main vehicular access into the site off Bridge Road



Photograph 2: Site looking west from main access road into the site



Photograph 3: View from looking east from wester area of site



Photograph 4: View looking west from eastern area of site



Photograph 5: Bridgeway Centre viewed from Coed Aben Road

- 5.13 The Design and Access Statement, prepared by MCAU contains further images of the existing development.

Topography

- 5.14 The site sits at 30m AOD and like most of the other areas of the industrial estate can be regarded as being mainly flat.

Existing uses on site and surrounding

- 5.15 In terms of existing uses/operations on site, the majority of the existing units/floorspace on site is in industrial use (Use Classes B1, B2 or B8). The Bridgeway Centre itself, which is a separate block in the north eastern section of the site, is in commercial use, (Class A1).
- 5.16 The site is bounded by Bridge Road (NE) and Coed Aben Road(NW) with other industrial properties beyond to the other side boundaries to SW and SE.

Drainage and Flood Risk

- 5.17 Reference to the Natural Resources Wales Flood Risk Map confirms that the site in its entirety is located in Flood Zone 1. This zoning means that the site can be regarded as being at low risk of flooding and suitable for development.

Access

- 5.18 In terms of its accessibility profile, the site is well-located vis a vis its relationship to the road network and public transport services that serve the industrial estate and it is served by four separate accesses off Bridge Road and other highways. Further details are covered in the Transport Report by Prime.

6 PROPOSED DEVELOPMENT

- 6.1 Specifics of the layout and design of the proposed development are depicted and described in detail in the Design and Access Statement ('DAS') by MCAU.

Overview

- 6.2 The proposed scheme is for the redevelopment of all but one of the site's existing blocks of units to provide for 9 new blocks of development subdivided into smaller units all for employment uses.
- 6.3 The block being retained is known as Block B and this is the block that is located in the north eastern end of the site facing towards Coed Aben Road and is in use for retailing and food and drink uses.
- 6.4 The new blocks of development are Blocks C to J. Each will provide a range of different sized units for employment uses defined as uses falling within Use Classes B1, B2 and B8.
- 6.5 It should be noted that a further new block of development that the applicants would like to promote in future is Block A. This is on land further to the north east of Block B and directly abutting Coed Aben Road. This shown on the proposed layout plan, Figure 2 overleaf. It forms part of the blue line land but is not in red line land. The use of Block A has still to be defined but the current preferred option is a food and drink use. Should the applicants decide to secure planning permission for this in future this will be through a separate planning application.
- 6.6 The proposals include a modified access off Bridge Road (improved), new circulation roads, dedicated commercial/HGV servicing and car parking along with landscaping.

Proposed Layout

- 6.7 The proposed layout of the new development is shown in Figure 2. More detail is available in the Design and Access Statement and other drawings prepared by architects, MCAU.



Figure 2: Proposed layout (with exception of Block A, far right)

Proposed development

6.8 The main elements of the development proposal comprise:

- Delivery of development on an area of up to 3.4 ha (8.4 acres)
- Delivery of 9 new blocks containing 52 units (Blocks C - J) for employment uses, combined floorspace 10,307 sqm (110,949 sqft) GIA of new employment floorspace
- Retained / refurbished Block B containing 6 units for retail and food and drink uses, retained combined floorspace 674 sqm (7,254 sqft) GIA
- Four separate accesses points and internal main and sub-circulation road network
- Dedicated small yard area for each unit
- 232 car parking spaces including provision for accessible spaces and EV charging spaces in total¹
- Landscaping

¹ Car parking spaces figure excludes 14 spaces to be provided to Block A; combined total is 246 spaces



- New SUDS drainage
- Ancillary infrastructure, utilities and services

6.9 Not part of the proposed development but illustrated for information is the potential for a future new Block A as referred to previously.

Blocks/Units Floorspace Details

6.10 The net change in employment floorspace is +6,826 sqm / +73,479 sqft GIA. This results from the formation of 10,307 sqm (110,949 sqft) GIA floorspace across 8 new blocks providing 52 units in total, replacing 9 existing blocks with a combined floorspace of 3,481 sqm / 37,470 sqft.

6.11 Details for the proposed new blocks / units are as follows – floorspace is combined for each block:

- Block B – Retained / refurbished retail units – 6 Units – 674 sq m (7,254 sq ft)
- Block C – New floorspace - Employment – 13 Units – 1,525 sq m (16,419 sq ft)
- Block D – New floorspace - Employment – 7 Units – 694 sq m (7,470 sq ft)
- Block E – New floorspace - Employment – 13 Units – 1,192 sq m (12,835 sq ft)
- Block F – New floorspace - Employment – 7 Units – 3,042 sq m (32,739 sq ft)
- Block G – New floorspace - Employment – 4 Units – 540 sq m (5,813 sq ft)
- Block H – New floorspace - Employment – 2 Units – 808 sq m (8,697 sq ft)
- Block I – New floorspace - Employment – 5 Units – 1,762 sq m (18,579 sq ft)
- Block J – New floorspace - Employment – 1 Unit – 780 sq m (8,396 sq ft)

6.12 Excluded from this application, but for information purposes, Block A if developed may provide approximately 181 sqm / 1,948 sqft GIA of retail / food & drink floorspace.

Design

6.13 The design of the proposed units will be contemporary in design and style and use of materials. Full details of the details of the development, including dimensions, are set out and confirmed through the drawings pack and also the DAS.

- 6.14 Figure 3 provides an illustrative CGI of the development, prepared by MCAU, of the overall style, appearance and general visual qualities of the proposed development. These details apply to Blocks C to J.



Figure 3: Illustration of overall style and appearance (Blocks C to J)

7 PLANNING FRAMEWORK

Background

- 7.1 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 confirm that a well-functioning planning system is fundamental for sustainable development and achieving sustainable places.
- 7.2 Up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making. Planning applications must be determined in accordance with the adopted plan unless material considerations indicate otherwise.
- 7.3 Material considerations can cover anything to do with the purposes of planning and include all typical planning, development, land use and related factors that have a bearing on whether a planning application should be granted.
- 7.4 It should be noted that national planning policy for Wales has the status of a material consideration in planning decisions, although it can be given greater weight where there is the absence of a comprehensive or fully up to date development plan.

Presenting Policy

- 7.5 Although the decision-making framework places great emphasis on the development plan in development management decisions we present relevant planning policy in a top down approach, i.e., national planning policy first followed by development plan policy. This is because development plans take their lead from national planning policy.

National Planning Policy

Planning Policy Wales, 11th Edition 2021

- 7.6 *Planning Policy Wales*, 11th Edition published in February 2021, (“PPW1111”), sets out the land use planning policies of the Welsh Government. It is supplemented by a series of *Technical Advice Notes* (“TANs”), Welsh Government Circulars, and policy clarification letters.

- 7.7 At paragraph 1.2 PPW11 confirms that its 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. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places.
- 7.8 At paragraph 1.11 PPW11 deals with the well-being of Future Generations, which is a fundamental aim of policy. The *Well-being of Future Generations (Wales) Act, 2015* places a duty on public bodies to carry out sustainable development. This is not a new concept for the planning system as the principles of sustainable development have been at the heart of planning policy since PPW11 was first published in 2002. However, the concept has been expanded under the *Well-being Act* and it requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural.
- 7.9 A key aim of PPW11 is to achieve successful placemaking. It confirms at paragraph 2.8 that planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven well-being goals and by using the five Ways of Working, as required by the *Well-being Act*. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle.
- 7.10 A key guiding principle, which applies to economic development (Figure 4, page 17), is achieving the right development in the right place which extends to growing the Welsh economy in a sustainable manner. The planning system should enable development which contributes to long term economic well-being, making the best use of existing infrastructure and planning for new supporting infrastructure and services. Communities, national and local government, businesses, and the third sector must work together to take a long term view, integrating and aligning priorities through greater collaboration to achieve sustainable economic benefits for all in line with the well-being goals.
- 7.11 Section 5 deals inter alia with economic development like that proposed under the planning application. It confirms at paragraph 5.4.1 that the Government defines economic development, least for planning purposes, as the development of land and buildings for activities that generate sustainable long term prosperity, jobs and incomes.

The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses.

- 7.12 At paragraph 5.4.2, PPW11 confirms that economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services. Economic land uses also include construction, energy, minerals, waste and telecommunications sectors which are also sensitive to planning policy. The Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim. Similarly, growth in innovative, emerging technology and high value added sectors such as advanced engineering, renewable and low carbon energy, digital and bio-technology sectors are also strongly supported. Development plans should consider the role these sectors may play in terms of investment and job creation in their area. This section focuses primarily on traditional employment land uses (B1, B2 and B8) while policies on other economic sectors are found elsewhere in this chapter and other parts of PPW11.
- 7.13 At paragraph 5.4.3, PPW11 confirms that local planning authorities should support the provision of sufficient land to meet the needs of the employment market at both a strategic and local level. Development plans should identify employment land requirements, allocate an appropriate mix of sites to meet need and provide a framework for the protection of existing employment sites of strategic and local importance. At paragraph 5.4.4 PPW11 advises that, wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration. Sites identified for employment use in a development plan should be protected from inappropriate development.

Technical Advice Notes

- 7.14 PPW11 is complemented by more detailed national guidance set out in topic based technical guidance notes known as TANs. These cover a number of topic areas. Those regarded as being directly or of some relevance to the proposed development are summarised below.

TAN 11: Noise (31 October 1997)

- 7.15 Regarding noise generating development, local planning authorities must ensure that noise generating development does not cause an unacceptable degree of disturbance. They should also bear in mind that if subsequent intensification or change of use results in greater intrusion, consideration should be given to the use of appropriate conditions.
- 7.16 Noise characteristics and levels can vary substantially according to their source and the type of activity involved. In the case of industrial development, for example, the character of the noise should be taken into account as well as its level. Sudden impulses, irregular noise or noise which contains a distinguishable continuous tone will require special

TAN 12: Design (31 March 2016)

- 7.17 This TAN notes that the Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment which is fit for purpose and delivers environmental sustainability, economic development and social inclusion, at every scale throughout Wales – from householder extensions to new mixed use communities.
- 7.18 To deliver this, all decision makers across Wales need to understand both the importance of good design and the ways in which it can be achieved. Design is defined in PPW11 as: ‘the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings.’
- 7.19 The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers choice where a single design solution cannot accommodate all users, provides for flexibility in use, and, provides buildings and environments that are convenient and enjoyable to use for everyone.

TAN 15: Development and Flood Risk (30 July 2004)

- 7.20 This planning advice note should be read in conjunction with PPW11 and other technical advice notes and circulars should be taken into account by local planning authorities in Wales in the preparation of development plans. They may be material to decisions on individual planning applications and will be taken into account by the National

Assembly for Wales and Inspectors in the determination of appeals and called-in planning applications.

- 7.21 The TAN provides technical guidance which supplements the policy set out in PPW11 in relation to development and flooding. It advises on development and flood risk as this relates to sustainability principles (section 2.2 PPW11) and provides a framework within which risks arising from both river and coastal flooding, and from additional run-off from development in any location can be assessed.

TAN 18: Transport (31 March 2007)

- 7.22 The TAN notes that an efficient and sustainable transport system is a requirement for a modern, prosperous and inclusive society. However, transport, in particular road traffic, can also have negative impacts on human health and the environment. Road traffic growth is a cause of increased local air pollution, greenhouse gas emissions contributing to global warming and climate change and, in some areas, congestion, which can affect economic competitiveness.
- 7.23 On other major travel generating uses, the TAN notes that the location of major travel generating uses, including employment, education, shopping and leisure can significantly influence the number and length of journeys, journey mode and the potential for multi-purpose trips. Development plans should seek wherever possible to identify locations for such developments, which offer genuine and easy access by a range of transport.
- 7.24 Locations that are highly accessible by a variety of travel modes offer significant opportunities to make travel patterns more sustainable. When preparing or reviewing development plans, planning authorities should identify all potential development sites which have high levels of accessibility to non-car modes. Care should be taken to ensure that allocations in these locations are at sufficient densities to fully utilise the accessibility potential of the site and to including housing with other uses where appropriate. Development sites which are car dependent and unlikely to be well served by new public transport, walking and cycling should only be allocated or reallocated in development plans for uses which are not travel intensive.

TAN 21: Waste (23 February 2017)

- 7.25 Regarding general Principles, the TAN confirms that, when considering development proposals for all types of waste management facilities, planning authorities should take

into account their potential contribution to the objectives, principles and strategic waste assessments set out in Towards Zero Waste and the relevant waste sector plans and the relevant development plan for the area. The extent to which a proposal demonstrates this contribution, in environmental, economic and social terms, will be a material planning consideration. The aim is to ensure that the right facilities are located in the right place to meet environmental, economic and social needs.

TAN 23: Economic Development (28 February 2014)

- 7.26 The TAN confirms that PPW11 advises that planning for economic land uses should aim to provide the land that the market requires, unless there are good reasons to the contrary. Where markets work well, this will help maximise economic efficiency and growth.
- 7.27 Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development.
- 7.28 LDP employment land targets should aim to ensure that planning meets the demand for land, so that economic growth is not constrained by lack of land. Authorities should work together to steer development to the locations which are the most sustainable and efficient (both when allocating sites for the LDP and when dealing with proposals for development).
- 7.29 On existing employment sites, the TAN confirms that certain industrial and related uses may conflict with other uses, especially housing. To operate effectively, these activities usually need dedicated industrial areas, where they can be confident that they will not be a bad neighbour to anyone. In managing the retention and release of existing employment sites authorities should aim to ensure that the integrity of remaining employment sites is not compromised.

Development Plan

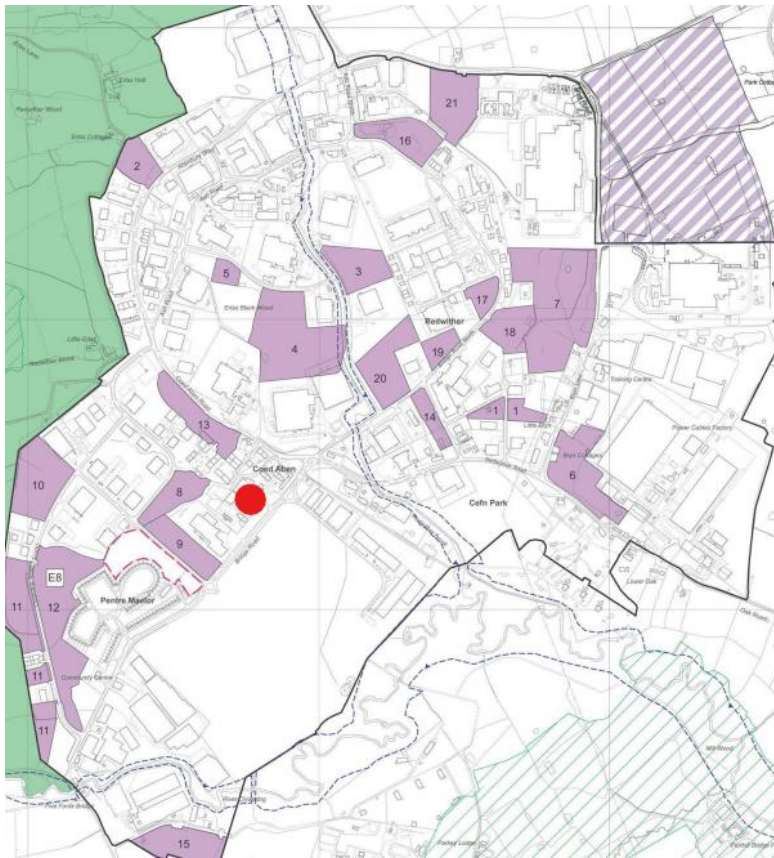
Wrexham Unitary Development Plan

7.30 The Council adopted the Wrexham Unitary Development Plan (“WUDP”) 1996 - 2011 in February 2005. The plan covers the administrative area of Wrexham County Borough. Relevant policies are as follows (confirmed by council through pre-application process):

- PS1 Settlement limits
- PS2 Environmental Impacts
- PS11 Biodiversity GDP1 Development Principles
- T8 Parking
- S4 Large-scale retail development
- EC4 Trees EC6 Biodiversity
- EC13 Surface water run-off
- E4 Employment development within settlement limits

7.31 The list ignores Policy E1. Policy E1 confirms that sufficient land will be allocated for employment development between 2001 and 2011 at Wrexham Industrial Estate and goes onto identify a considerable number of sites/areas of land within WIE for new development. However, these tend to be undeveloped sites/areas of land. Sites like the subject site are not specifically allocated for development under this policy. Instead, employment development on what is termed ‘Unannotated Land within Defined Settlements,’ and we would say that this also applies to Wrexham Industrial estate, are subject to Policy E4 - Employment Development on Unannotated Land within Settlement Limits (also not identified). This supports employment development subject to Policy GDP1 - General Development Principles.

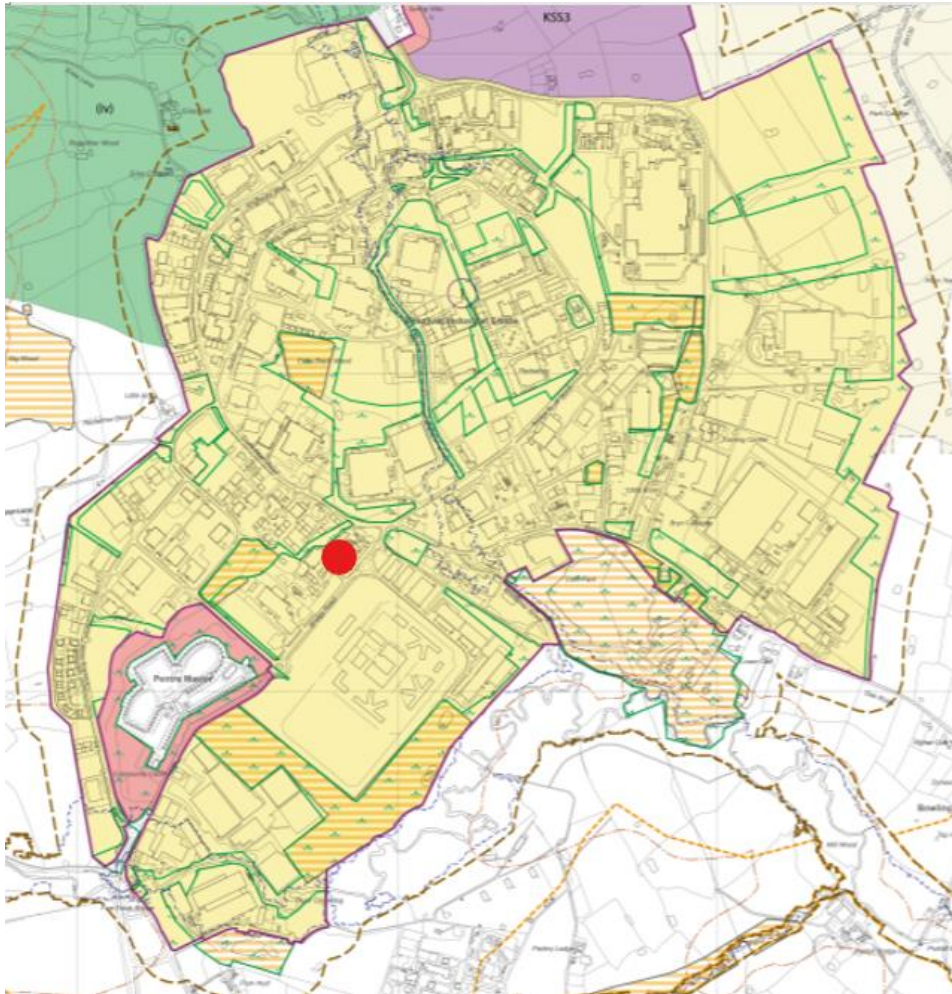
7.32 Figure 4 overleaf provides relevant extract from the Proposals Map.



*Figure 4: Extract Proposals Map, Wrexham UDP
– site marked within Wrexham Industrial Estate*

Wrexham Local Development Plan

- 7.33 The Council is currently preparing a new plan to be called the Wrexham Local Development Plan (“WLDP”) which will replace the adopted WUDP. The plan is advanced having been through its examination stage. It is likely to be adopted later on in 2021. Accordingly, we give weight to how it treats the subject site and the proposed development.
- 7.34 The WLDP confirms that the site is affected by Policy SP10: Wrexham Industrial Estate. Figure 5 overleaf provides relevant extract from the emerging Proposal Map.



*Figure 5: Extract Proposals Map, draft Wrexham LDP
– site marked within Wrexham Industrial Estate*

- 7.35 Policy SP10 confirms that Wrexham Industrial Estate, as shown on the proposals map, will be the primary focus for new employment development in the Borough over the plan period for Use Class B employment and other ancillary related development. Land is also protected on the estate for a strategic ecological network for a number of protected species and habitat.
- 7.36 Consideration of policy suggests that new Use Class B employment development, which is of a good quality and suitable for the site it is proposed to be developed at, subject to including appropriate ecological mitigation proposals given national and internationally protected species that are present at the Industrial estate, can be regarded as acceptable in principle.

Planning Guidance

7.37 Local Planning Guidance Notes of relevance are as follows:

- 15 Cycling
- 16 Parking standards
- 17 Trees and development
- 23 Contamination
- 26 Landscaping and employment development
- 29 Biodiversity and employment
- 32 Biodiversity

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8 EMPLOYMENT LAND CONSIDERATIONS

8.1 A separate employment land statement has been prepared by FIREM and Plan Red and will be submitted in support of the planning application when made and as part of the current pre-submission exercise.

8.2 Below is a summary of the key findings of that statement:

- Wrexham County Borough's economy has been transformed in the past twenty years from one dominated by heavy and traditional industry into a major high tech manufacturing technology and services hub.
- Like most urban centres Wrexham has suffered from UK wide recessions and changing shopping habits resulting from internet and 'click and collect' shopping options. Footfall in the town centre has dropped by 28.3% since 2010 compared to the national average of 20%. And whilst it remains a concern, compared to UK average there is a lower proportion of empty shops on Wrexham's "High Street."
- It is FIREM's experience that demand for good quality, reasonably priced, well profiled and modern employment units for Use Classes B1, B2 and B8, available on traditional and flexible lease arrangements at WIE, remains very strong (2020/21), and if anything is likely to grow.
- The current structure of the availability of premises is strongly geared towards industrial, with the bulk of this stock being located at Wrexham and Llay Industrial Estates.
- The Employment Land Review 2015 ("ELR") found the existing supply strongly focussed on the WIE with 141.07 of the total 204.91 hectares located on the Estate.
- The availability of an existing employment land supply was not therefore identified as a major issue in Wrexham in the ELR for the purposes of setting an employment land requirement through the emerging WLDP. The supply envisaged some 53% of the net supply able to be brought forward within a 5 year period, and some 23.75 hectares were immediately available.
- However, the ELR did, however, identify that while the County Borough as a whole in theory has sufficient land to meet its needs, qualitative research undertaken indicates a growing land supply shortfall, relating to identified land on the Wrexham Industrial Estate.

- The review found a continuing strong demand for sites on the Estate and a shortfall of readily available land on which to create an offer for the future marketing of the Estate to inward investors or existing businesses.
- Furthermore, the development of the North Wales prison on the Estate has had the effect of boosting market demand at the Estate as supply chain and affiliated companies seek to locate/ expand close to the facility.
- The above is certainly the experience of FIREM. It is its experience that not only is there a shortage of readily available land but there is also a shortage of good quality modern industrial units that fall within the small to medium floorspace range, and which are available on flexible lease term arrangements. By this we mean opportunities for start-up businesses taking their first unit/floorspace (in small unit) to jump from this profile of unit to a larger unit once the business has started to grow and succeed and so on. This is what we term accommodating cradle to adulthood floorspace needs. It is also FIREM's experience and that of its agents that there is an increasing general shortage of undeveloped/greenfield land at WIE for employment development that falls into the categories of medium to large scale units which offer potential to accommodate larger businesses enterprises.

8.3 Based on work undertaken by FIREM and its agents and reflecting FIREM's experiences as a developer and landlord, including at WIE, and also reflecting approaches to both by businesses and enterprises wishing to take new floorspace/units, FIREM's view of the local employment land and premises market along with local demand (2020/first half of 2021) is as follows:

- There continues to be a steady flow of enquiries for modern and fit for purpose industrial units at WIE (Modern and fit for purpose industrial units is defined as follows:
 - Unencumbered operational floorspace.
 - High floor to ceiling clearances (10 m+ in some units).
 - Large doors/gates.
 - High security with roller shutter doors.
 - Dedicated yard/service areas.
 - Dedicated car parking.
 - Integral offices in larger units.



- Integral w/c and related employee accommodation.
 - Easy access to/from main access serving site.
- The size of units for which there is currently good demand is as roughly follows:
 - 93 sqm (1,000 sqft) GIA floorspace.
 - 139 sqm (1,500 sqft) GIA floorspace.
 - 279 sqm (3,000 sqft) GIA floorspace
 - 464 sqm (5,000 sqft) GIA floorspace
 - 743 sqm (8,000 sqft) GIA floorspace
- The types of leases that occupiers generally want are as follows:
 - 5 years with incentives and break clause after 3 years.
 - 10 years with incentives and break clauses after 3 and 7 years.
 - 15 years with incentives after 5 and 10 years.
- Demand for new larger units but delivered through bespoke new build on undeveloped land.
- Generally, while there continues to be demand for older more constrained units in terms of type of accommodation, issues with these types of units, as expressed by current and potential occupiers, is as follows:
 - Low ceiling height is an issue.
 - Encumbered working areas is an issue.
 - Generally limited scope for flexible use.
 - Doors/gates too small.
 - Maintenance costs high.
 - Perception issues.

9 PLANNING ASSESSMENT

Approach

- 9.1 This section of the statement assesses whether the proposed development accords with the provisions of the local development plan, this by reference to the planning decision making framework as set out in Section 7 of the statement. In so doing it also considers whether the planning application can be regarded as acceptable by reference to relevant material considerations and usual planning and land use considerations.
- 9.2 Our assessment and case in support of the planning application is presented by identified key topic areas leading to our conclusion that the planning application accords with relevant development plan policy, and other policies and guidance, and therefore a recommendation to grant planning permission.

Principle of Development

- 9.3 The site is located in the heart of the Wrexham Industrial Estate, ("WIE"), a defined location in adopted and emerging development plan for existing and future industrial development and uses.
- 9.4 The site is previously developed land and partly occupied, for industrial and some retail uses, already generating considerable levels of activity. The redevelopment will maintain the use profile of the site, but increase the amount of industrial floorspace, a more efficient use of the land opportunity available and providing more employment opportunities. It is a sustainable development by location, approach and socio-economic benefits.
- 9.5 The new development arrangement of the site will serve to significantly improve the offer and the longevity of the employment benefits that accrue in a local and regionally significant location. The site has to be regarded as eminently suitable for the proposed development and the principle of built form of the development at the site is well established within its surroundings.
- 9.6 All these points are important material considerations in support of the application in principle.

Employment Land Considerations

- 9.7 As is set out in the preceding section of this statement, there is recognised and strong need, plus market demand, for the type and profile of industrial units that the planning application proposes including at WIE.
- 9.8 The proposed development will improve and contribute significantly to the supply of modern fit for purpose industrial units serving the local and sub-regional area and meet related demand. It will be a significant asset to WIE and increase its attractiveness to the local and wider regional market. This also applies to Block B, which is to be retained but will be improved, as this contributes to the overall safe and efficient operation of WIE.
- 9.9 Overall, these are important material considerations in support of the planning application.

Profile of Application Site

- 9.10 Although it is not a matter of direct concern to land use planning and the form of built development, it is important to socio-economic impact to record that it is the intention of FIREM as landowner and developer to assist existing business / uses / operators in the industrial units to either relocate to one of the new units being created or to other units within FIREM's control elsewhere within WIE. This will be achieved by the phased demolition and construction of the planned units, thereby maintaining existing employment and business continuity.
- 9.11 Also of relevance, the current use of the site is industrial and is a use which generates noise and activity and visits from the public and vehicular movements throughout the day. The commercial uses fall within Use Classes B1, B2 and B8. The fact the site is located in the heart of a well-established industrial estate, WIE, means that these uses can be carried out without impacting on other uses like residential. Indeed, although there is an area of residential to the south west of the site, which was developed as part of the original munitions factory operations, this is some distance away, and is separated by screen planting, other premises, road and barriers.
- 9.12 The reason for making this point is that the planning application proposals will not change the current use profile of the application site and development it currently supports, and these are uses that are appropriately located there by reference to the allocation of WIE in the development plan. Accordingly, the current use/development

will be replaced but only by a modern and updated version of the use/development that the site currently supports and is allocated for. And like the current use and its operation the new development will not impact on amenity levels enjoyed by softer uses like residential which although in the wider vicinity are sufficiently distant not to be adversely affected.

- 9.13 These are factors to be considered in support of the proposed development.

Adjoining Uses and Surroundings

- 9.14 As has already been confirmed, the site is in a well-defined and established industrial estate, WIE, which is allocated for this use. As such it is a site which is intended to support uses and activities that generate activity and noise across the working day. Developing uses like those proposed under the planning application (Use Classes B1, B2 and B8) at the application site safeguards other sites and locations from development of this ilk, which is also a point in favour of the application.

Floorspace Considerations

DRAFTING NOTE

Floorspaces referred to below and in analysis will be reviewed and confirmed at submission and adjustments to outputs made.

- 9.15 The development will deliver a net increase in industrial floorspace (Uses Classes B1, B2 and B8) of 6,443 sqm / 69,351 sqft.
- 9.16 The net increase is achieved through the demolition of all existing buildings except Block B and their redevelopment for 8 new Blocks C to J, containing a range of new units with a combined total of 52 units.
- 9.17 Overall the combined industrial floorspace will be 10,307 sqm / 110,949 sqft formed over new Blocks C to J.
- 9.18 Block B, the existing retail parade, will be retained and refurbished within no net change in floorspace – remaining as 674 sqm / 7,254 sqft combined over the retail units.
- 9.19 The combined total floorspace of the development site, i.e. Blocks B to C inclusive, is 10,981 sqm / 118,203 sqft.

- 9.20 Block A, a potential future retail / food & drink unit is not part of this application and is not a floorspace consideration at this time.
- 9.21 The proposal therefore delivers a significant benefit in the amount of employment floorspace provided compared to the existing site, a more efficient use of land which is a central objective of land use planning and sustainable development principles. It is of course a suitable intensity of the use of the land with regard to the well-established and defined Wrexham Industrial Estate within which it is located. And more employment floorspace offers the opportunity for more business, enterprises and jobs to be created.
- 9.22 This is an important material consideration in support of the planning application.

Employment Support and Generation

- 9.23 The Bridgeway Centre currently supports 20 business involved in a range of employment activities primarily falling within Use Classes B1, B2 and B8 and also other retail businesses within Block B. The position is fluid as some tenancies are short-term, but current calculation is the businesses provide in the region of 100 full-time equivalent jobs ("FTE").
- 9.24 New blocks, Blocks C to J, which will create 52 new units and a combined 10,307 sqm (110,949 sqft) GIA floorspace, providing scope to generate considerably more employment jobs at the application site than is the case at present.
- 9.25 Guidance in the *Employment Density Guide, 3rd Edition*, HCA (2015) sets multipliers of FTE job creation by floorspace and use. A range of employment density results across the B1, B2 and B8 uses ranging from high density office to low density warehouse and distribution uses. Reflecting the current businesses and the range of units being promoted, many for small and medium size enterprises, an average rate of 1 FTE per 47 sqm which aligns with Use Class B1c light industrial is applied for this assessment².
- 9.26 Applied to the 10,307 sqm new industrial floorspace this equals generates approximately 219 FTE jobs ($10,307 \div 47 = 219.29$).
- 9.27 Clearly, should the future occupiers users veer toward higher density uses, including B2 uses (1 FTE job per 26 sqm), then job generation could be higher, or conversely to B8 uses

² Employment Density Guide, 3rd Edition, HCA (2015), Section 4



(1 FTE job per 70-77 sqm for final mile or regional distributors), then job generation could be lower.

- 9.28 Because there is potential for retention of existing employment onsite the net increase could be lower at circa 119 FTE jobs (219 – 100). There is nuance here that even if not all existing employers relocate with the site but elsewhere within WIE then the job opportunity is displaced from elsewhere within WIE. Therefore, as an overall net increase in employment 119 FTE jobs is a reasonable assumption of the minimum benefits of the proposed development.
- 9.29 This is a considerable benefit of the proposed development and an important material consideration in support of the proposed development.
- 9.30 In addition construction employment benefits will accrue for temporary employment opportunities as additional benefit.

Access and Transportation Considerations

- 9.31 Access and transportation matters are covered in detail in the Transportation Report prepared by Prime Transportation. This extends to covering how the site is proposed to be accessed; how it can be accessed by different modes of travel; the operation of the transportation elements of the wider scheme, which takes into account car parking and other parking provision; and the impacts and effects of the proposed development on the local network and other transportation matters of relevance.
- 9.32 As we have already confirmed, the site is very well located in accessibility, sustainability and transportation terms being located in the heart of WIE. It can be accessed on foot from the residential area nearby. It can also be accessed on cycle with two proposed secure cycle store facilities provided on site to encourage such use. WIE is served by a number of bus services that link with Wrexham and serve locations and centres further away. These focus on the town centre and as such the site can easily be reached by those travelling from Wrexham on public transport. Obviously the site can also be accessed by private car and the all movements junction that serves the site means traffic from the south west and north east can easily and safely access the site. It should also be remembered that WIE is well served by the local road network which includes trunk and primary routes serving the motorway network and major centres further away.



- 9.33 In summary, we would say that the site and proposed development can be regarded as highly sustainable in terms of its approach to transportation, and this is also reflected in the conclusions of the Prime Transport Report. This also includes a Green Travel Plan which confirms that workers at the site will be encouraged to use sustainable modes to travel to work as will visitors.
- 9.34 The Transportation Report also confirms that the overall impact of the proposed development on the local highway network is acceptable and little different to that associated by the current use of the site.
- 9.35 Overall, we note all of the key findings and conclusions of the Transportation Report by Prime Transportation and from these have been able to conclude that the overall effects and impacts of the transport related elements of the planning application and the proposed development it promotes can be regarded as acceptable.

Ground Conditions

- 9.36 The planning application is supported by a site investigation report (Desk Top Stage 1 Site Investigation Report by Barnsley Marshall) which confirms the site's credentials for redevelopment for the proposed development.
- 9.37 The application site is brownfield, industrial and already developed in its contexts and as such it can be regarded as suitable for new development for new industrial through the redevelopment of the existing structures on site. The site's history of munitions manufacture and storage means that the applicant is happy to accept a planning condition requiring related procedures to be put in place should any historic munitions be identified during construction.
- 9.38 The planning application and proposed development can be regarded as acceptable and supportable by reference to ground conditions.

Ecology

- 9.39 At pre-application stage an ecology report was requested, this to focus on the potential of existing areas of the site and buildings on site to support individual or colonies of great crested newts and bats. Historically, and associated with these proposals, extensive ecology surveys were carried out by UES (in previous years and also 2020) and these, set

out in a covering report, along with a related ecology strategy, will be submitted in support of the planning application.

- 9.40 The overall findings and key conclusions of the ecology report is that protected species like great crested newts and bats can be dealt with and/or accommodated in a satisfactory way through the planning application, which might also involve use of obligations (in a legal agreement) and planning conditions.
- 9.41 The approach to ecology by FIREM in its role as applicant and development, reflecting other of its applications and schemes for industrial/employment developments/units at WIE, can be regarded as tried and tested and appropriate in this instance given the circumstances of the site and profile of the proposed development.

Flood Risk and Drainage

- 9.42 Flood risk and drainage were topics that were identified at pre-application stage as needing to be addressed through the planning application. Accordingly, the applicants commissioned Sutcliffe to investigate the potential of the application to be at risk of flooding and regarding how drainage might be dealt with.
- 9.43 The key findings and conclusions of the work they carried out is that the majority of the application site, by reference to the Natural Resources Wales Flood Risk Map of Wales, can be regarded as an area that is not susceptible to flooding (sea, rivers/water courses and from surface water/pooling).
- 9.44 Overall, it can be concluded, by reference to the above, that the application site can be regarded as being at low risk of all forms of flooding and can be regarded as acceptable for development of the profile proposed under the planning application.

Noise impacts

- 9.45 The nature of the application and the profile of the proposed development confirm that the development will not generate noise related concerns or issues and as such this is not a topic that should be of concern to the council.

Impacts on heritage assets and Archaeology

- 9.46 There are no identified heritage assets at or in the vicinity of the planning application site.



- 9.47 The pre-application response included comments from the council's Development Control Archaeologist. This confirmed that information currently held on the Historic Environment Record does not initially indicate any archaeological records in the development area. It suggests that, based on mapping from the 1940s-1950s, some of the smaller brick single-storey buildings to be demolished are probably of WWII origin and associated with the long closed former munitions factory which operated at the WIE. Although all it is acknowledged that all have been converted for later use, some buildings survive essentially intact, although this is not conclusive. The consultation response claims that the WWII building functions and importance within the overall former ROF Wrexham munitions factory area are not understood at this time and the buildings are not recorded. We are not sure this is the case based on information and records available now. As such it is suggested that a pre-determination historic buildings assessment be provided (as part of a Level 3 study of the buildings) so that their heritage value can be assessed and suitable mitigation discussed. This should be completed in accordance with the PPW11 and TAN 24 (May 2017).
- 9.48 This is the response of the relevant case officer, who to our knowledge did not visit the site or carry out any internal inspection of the buildings. We can confirm that the buildings have been substantially remodelled and modernised to enable them to be used for industrial/employment purposes. And because of this we would question their value in heritage terms, particularly given the level of modification and changes they have been subjected to since they were originally used for the purpose they were developed for.
- 9.49 Nevertheless, the applicants would be happy to record and provide a written and photographic record of the buildings prior to them being demolished and would accept a planning condition to this effect.

Visual impacts

- 9.50 The existing development at the site comprises visually unattractive industrial profiled buildings albeit in a semi-modernised form mainly through the addition of cladding. The development of a contemporary high quality designed series of employment blocks will improve the visual attractions of the application site. Furthermore, there are no safeguarded or identified views to be retained or protected, plus the type of development proposed is now commonplace at WIE. And it should be noted that, given the industrial and urban contexts of the site's hinterland, which include a large prison to the south east,

views of it from distance are very limited. As such there are no visual impact related concerns relating to the planning application and the development it promotes.

Design and layout

- 9.51 The proposed design and layout of the scheme is of a high quality and right for the site. The approach to site layout, unit design, materials etc., is described in greater detail in the DAS by MCAU Architects. For the sake of brevity we do not repeat this in the statement but note the conclusions of the DAS that the layout and design of the proposed development is acceptable and appropriate and supportable by reference to all levels of planning policy.

Sustainability

- 9.52 Development and construction related sustainability matters are also covered in detail in the Design and Access Statement, but we can confirm that the proposed development satisfies relevant standards and is of a high quality in terms of its sustainability credentials.

Trees

- 9.53 A Tree Survey / Arboricultural Impact Assessment is submitted in support of the planning application. This confirms that existing trees and greenery that would be affected by the proposed development are generally of allow/poor quality and can be replaced by new planting, which is also reflected on the landscape scheme submitted in support of the application.

Drainage and Services

- 9.54 Foul and surface water drainage and services either exist and can be used as they are or can be adapted to meet the needs of the proposed development. Details of drainage arrangements, which include a SUDS system, are set out in the report by Sutcliffe. This confirms that the proposed arrangements satisfy site and policy related needs.

Retail Benefits

- 9.55 The planning application retains Block B and the retail uses that it supports albeit in an improved format. These are regarded as important local services by other businesses and enterprises at the WIE. Retaining this block and the businesses it supports is a benefit of the planning application.

Conclusions on planning and land use considerations

- 9.56 Before we consider and address whether the proposed development accords with development plan policy, as this is the key consideration in the planning decision making framework in Wales, we conclude on whether the planning application and the proposed development it supports, by reference to the planning and land use matters set out above, can be regarded as acceptable and supportable. This is because some of the topic areas set out above feed into or of direct relevance to specific planning policies identified in Section 6 as being of direct relevance.
- 9.57 Following the detailed assessment set out above, it is our view that the planning application and proposed development it supports can be regarded as acceptable by reference to the site's profile, ground conditions, design and layout, transportation, ecology, noise, flood risk, drainage and services profiles and all other matters considered.

Accordance with Development Plan and Other Planning Policy

- 9.58 Further to the detailed assessment set out above, we now consider whether the planning application accords with relevant policies in the WUDP. These were identified for us through the pre-application process. Based on the detailed assessment set out earlier in this section, it is our view that the planning application can be regarded as one that accords with relevant development plan policy. The policies in question are: PS1 Settlement limits; PS2 Environmental Impacts; PS11 Biodiversity GDP1 Development Principles; T8 Parking; S4 Large-scale retail development; EC4 Trees EC6 Biodiversity; EC13 Surface water run-off; E4 Employment development within settlement limits and Policy E1 Sufficient Land will be Allocated for Employment Development Between 2001 and 2011 at WIE; Policy E4 Employment Development on Unannotated Land within Settlement Limits will be permitted subject to Policy GDP1.
- 9.59 We are also of the view that the proposed development broadly accords with policy in the emerging WLDP, which will shortly be adopted and is therefore an important material consideration in the determination of the planning application, particularly when one considers policies that deal with industrial development at existing developed sites and in areas like WIE which are allocated for employment.
- 9.60 The location and profile of the application site in the heart of the WIE means that the site can be regarded as suitable for industrial/employment developments. This includes developments of the form and scale of those promoted under the planning application.

This means that policy on development in settlements and existing employment sites can be satisfied and accorded with.

- 9.61 Furthermore, the fact that the planning application site is located within WIE means the site has to be regarded as one of the best profiled sites for this form of development, which adds weight to our view that the policies dealing with WIE and employment development are accorded with.
- 9.62 Regarding whether policy on layout, design and placemaking is accorded with, it is our view that the development is of a high quality, is appropriate to the site in terms of its scale and function, will complement existing uses on WIE, will not adversely affect its surroundings/surrounding uses, will contribute towards the health and general vitality and viability of the district and town of Wrexham and will generally benefit its local community through the provision of good quality jobs.
- 9.63 The development will also deliver a consider number of new jobs, which policy in WUDP and WLDP strongly support, and which will assist in sustaining the economy of Wrexham.
- 9.64 The proposed development will deliver sustainability and many other benefits. As such, and overall, the development can be regarded as according with all policies dealing with this topic.
- 9.65 Based on the key findings and conclusions set out earlier in this section, which is drawn from our assessment of work on flood risk and drainage, it is our view that policy on flood risk management and drainage is accorded with.
- 9.66 On transportation, the Transport Report by Prime Transportation, summarised earlier in this section, allows us to conclude that policy on sustainable transport and active travel can also be generally accorded with.
- 9.67 Regarding policy on ecology and trees and environment, the relevant statements by UES which deal with these topics which have been prepared and submitted with the planning application confirms that the planning application can be regarded as generally according with relevant policies.
- 9.68 Overall, the planning application and the proposed development it supports can be regarded as according with the currently adopted development plan and also the



emerging but soon to be adopted plan; also the provisions of national planning policy set out PPW11 and relevant TANs identified in an earlier section. It can also be regarded as being acceptable by reference to all usual and applying planning and land use considerations.

- 9.69 As such the planning application can and should be granted planning permission by reference to the statutory decision making framework applying in Wales as set out in an earlier section of this Statement.

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10 CONCLUSIONS

- 10.1 The Application Site is currently developed and in use for industrial development
- 10.2 The planning application is for the redevelopment of the site to provide a range of new, modern industrial units to meet the needs of a range of occupiers. The applicant is FIREM which has considerable experience of this type of development including at WIE.
- 10.3 In planning policy terms the site is located within the defined area of WIE. It can be regarded as appropriate for the form and profile of development proposed under the planning application.
- 10.4 WIE is a well-established and very large industrial estate which dates from WWII. Surrounding the site is a mix of industrial and employment developments and also a large prison. Further away is a zone of residential albeit this is well screened from and separate from the site. Accordingly, in land use terms the site's context is developed and mainly industrial and commercial in profile and is very typical of estates of this ilk. The developed and in use status of the site means it can be treated as a brownfield site/development opportunity.
- 10.5 The site is allocated in the development plan for the area, the WUDP, soon to be replaced by the WLDP, for industrial uses and development including those like the proposed development.
- 10.6 The application site's location in the WIE make it eminently suitable for industrial and employment development generally but it is particularly suited for multi-unit developments like that proposed under the planning application.
- 10.7 The proposed development is for a contemporary styled employment/business park, for a range of blocks and units, with dedicated car parking and servicing facilities accessed off Bridge Road. The proposed development, through the main blocks of development and the units they support, has been designed to be occupied and operated by a wider range of businesses and enterprises.
- 10.8 Existing employment will be retained and the scheme, through the new units and additional floorspace it will deliver, provides scope for this to be increased and by some margin. Overall, the new development could support a large number of jobs.

- 10.9 The proposed development would be a tremendous asset to WIE and Wrexham and would add considerably to its assets as a major centre for employment serving its current local and regional catchment.
- 10.10 The proposed development accords with the site's planning policy allocation/designation in the WUDP and the emerging WLDP (part of a designated industrial/employment zone) and which supports industrial/employment development in such locations. The planning application also accords with national planning policy in PPW11 and related TANs.
- 10.11 In addition, the planning application can be regarded as acceptable by reference to its impacts and effects on the local road network (transportation considerations), bio-diversity and ecology (bats), amenity of existing uses including residential (noise), ground conditions, flood risk and by reference to all other usual planning and land use considerations and can also be regarded as according with related planning policies of the WUDP and WLDP.
- 10.12 Overall, the planning application for the proposed development can be regarded as acceptable in planning terms including by reference to usual planning policy and general planning and land use considerations. Accordingly, the planning application can and should be granted.