



KRONOSPAN, CHIRK

**NORTH ACCESS ROAD INTO THE KRONOSPAN
FACILITY, LORRY PARK, WEIGHBRIDGES AND
WEIGHBRIDGE BUILDING, WEIGHBRIDGE CAR PARK
AND FACILITIES BLOCK, ROUNDWOOD STORAGE
AREAS, 132KV SUBSTATION, AND ANCILLARY
WORKS**

PLANNING STATEMENT

REV A - JULY 2023



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- Addendum to Appendix F (following revised Proposed Development design)

FOREWORD

This document is the Planning Statement for the construction and operation of a north access road into the Kronospan Facility, lorry park, weighbridges, weighbridge car park and facilities block, roundwood storage areas, 132kV substation, and ancillary works (the Proposed Development) on land immediately north of the existing Kronospan facility, Holyhead Road, Chirk (the Site).

Kronospan has invested significantly in the Chirk manufacturing site in recent years to deliver environmental benefits and maintain the future sustainability and viability of this major regional employer.

As Kronospan looks to the future the Company recognises that further investment is required to meet its Vision 2025 ambitions which are to deliver:

- Economic sustainability – delivering a profitable and growing business.
- Environmental improvement – reducing our impact and supporting UK Net Zero targets through production of sustainable products and operations.
- Social benefit – maximising the value of our teams and developing our role in the community.

The provision of the north access road is something which has been requested by the local community for several years. Kronospan has developed a proposal which would remove approximately 750 two-way heavy goods vehicles (HGV) movements from the residential section of Holyhead Road over a 24-hour period. This will have a variety of amenity and social benefits to the local community as well as improving the logistics arrangement at the Site.

The proposed 132kV substation would allow a connection to be made to the nearby 132kV electricity line which runs from Oswestry to Legacy, Wrexham. This brings with it several benefits to the local community by reducing the demand on the local network, mitigating the potential for local network failure, improved reliability for other businesses and community facilities and enhancing the opportunity for electric vehicle (EV) charging and provision of local renewable energy in Chirk. A separate and dependable power supply on the Site would improve its operational efficiency,

reduce the current dependence on the onsite fossil fuel-based generation facilities and enable the deployment of renewable technologies.

The Proposed Development would ensure the business can continue to meet customer demands in a competitive manufacturing environment, as well as delivering numerous environmental and social benefits. This investment would help to safeguard the significant direct and indirect employment opportunities supported by the business and the wider local and regional economic benefits which result from a major manufacturing business such as Kronospan.

An appraisal of the Proposed Development shows that it is in accordance with Unitary Development Plan (UDP) Policy PS2 and PS3 (The Broad Location of Development) which aim to ensure that the quality of the natural environment is not detrimentally affected by development and that development is directed to brownfield land wherever possible.

The Proposed Development Site is not designated as open space and the landscape of the Site does not have any such features, characteristics or qualities that require extra protection (as demonstrated by the findings of the Special Landscape Areas Study). It is not feasible to locate the Proposed Development elsewhere on previously developed land due to the location and nature of the surrounding land uses.

Except for UDP policies associated with land outside of settlement limits/employment area and Green Barrier/Green Belt, an appraisal of the Proposed Development against the remaining relevant policies of the UDP demonstrates that the Proposed Development would be in accordance with them.

The Proposed Development would require development outside of the existing settlement limit/employment area (as defined in the Local Development Plan (LDP)). The relative density of the existing Kronospan Facility and the presence and nature of the immediate surrounds means that the land to the north of the existing Kronospan Facility is the only practicable location for the Proposed Development. It is only by using the land to the north that the intended benefits of diverting HGV movements away from the main settlement would be realised. The proposed location of the Proposed Development immediately adjacent the settlement

limit/employment area (and the existing Kronospan Facility) would mean that it would be seen as a logical extension to the settlement limit/employment area.

As such whilst the Proposed Development is contrary to UDP Policy PS1 and UDP Policy E4 by virtue of its location outside of the settlement limit/employment area there are a range of unique factors which counter the policy tension which exists.

This Site is not considered to perform a key role in the purpose of the wider Green Barrier at Chirk and that the Green Barrier (as a whole) would retain its capability to perform its core functions. This, together with the justification provided above with respect to the location of the Proposed Development and its clear need and benefits, means that it is considered that the Proposed Development should be treated as an 'exceptional case' which on balance, combine to sufficiently outweigh the harm that the Proposed Development would otherwise do to the Green Barrier.

This conclusion is reinforced by the Wrexham Strategic Green Wedge Review (October 2017) undertaken as part of the evidence base for the LDP which omits the Proposed Development Site (and the surrounding area) from the Green Wedge/Green Barrier.

It is noted that the UDP is 11 years out of date and does not represent the Council's intended current and future ambitions for place-making within Wrexham County and decision-making on local developments. The Examination of the LDP is complete and assessed as meeting the test of soundness by Planning and Environment Decisions Wales (PEDW). Despite Wrexham County Borough Council's (WCBC) Full Council decision not to adopt the LDP on 19 April 2023 and again on 14 June 2023, the LDP will now be subject to a Judicial Review. Given the status of the LDP, significant weight should be attributed to it in the determination of this planning application.

An appraisal of the Proposed Development against the relevant policies of the LDP demonstrates that the Proposed Development would be in accordance with it. In particular Part iii of LDP Policy EM4 which supports the extension (outside of settlement limits) of an existing employment site (which is within a settlement limit or employment area) provided a) there are no suitable sites located within a settlement

limit/employment area for the extension to be located and b) the new development would form a logical extension to the settlement limit/employment area.

An assessment of the Proposed Development against the relevant planning policy and guidance has demonstrated that the Proposed Development is in accordance with the provisions of the statutory Development Plan when taken as a whole and so meets the principle test of Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 1.18 of PPW.

The Proposed Development has also been found to strongly accord with, and be supported by, a range of material planning considerations, including policies of the LDP.

Furthermore, it has been established that the Proposed Development constitutes sustainable development as defined within PPW and therefore there is a presumption in favour of granting planning permission for the development.

Based on the assessment contained in this Planning Statement the Proposed Development is deemed to represent sustainable development and will make a very important contribution to the delivery of the well-being goals set out in The Well-being of Future Generations (Wales) Act 2015.

Examination of the LDP is complete and the Inspectors Report on the LDP was issued by Planning and Environment Decisions Wales (PEDW) to WCBC in March 2023 stating that, subject to the implementation of the recommended binding changes, the LDP meets the tests of soundness and is recommended for adoption by WCBC. WCBC Full Council decided not to adopt the LDP on 19 April 2023 and again on 14 June 2023. The LDP will now be subject to a Judicial Review of WCBC's decision not to adopt the LDP.

1.0 INTRODUCTION AND SCOPE OF THE APPLICATION

1.1 Introduction and Background

1.1.1 This Planning Statement has been prepared in support of a planning application made by Kronospan Limited (hereafter referred to as 'Kronospan') for the construction and operation of a north access road into the Kronospan Facility, lorry park, weighbridges, weighbridge car park and facilities block, roundwood storage areas, 132kV substation, and ancillary works (hereafter referred to as the Proposed Development) on land immediately north of the existing Kronospan facility, Holyhead Road, Chirk (hereafter referred to as the Site). The location of the Proposed Development is illustrated on **Figure 1.1** and **ES Figure 1.1 (ES Volume 2)**.

1.1.2 Kronospan manufactures and distributes wood-based panels and is a leading manufacturer of products including Particleboard (PB), Medium Density Fibreboard (MDF), laminate flooring, and orientated strand board (OSB).

1.1.3 It is Kronospan's intention to ensure that the Chirk manufacturing site remains a world leading production site. Several projects have been delivered as part of the Kronospan Vision 2020 investment and development programme, and they allow Kronospan to deliver continued environmental improvements at the site. Future developments are intended to consolidate this and make further improvements to ensure the business remains sustainable at the site.

1.1.4 The Proposed Development follows a development programme to deliver environmental improvements at the site which are intended to ensure the long-term economic viability of the manufacturing facility. The development programme has included:

- Logyard silos and Recycled Timber (RCT) offloading and grading facilities.
- Melamine facing press hall/building.
- Wood Chip Preparation Building with a WESP Chip Dryer.
- Log Delivery and Transfer System and Building to House a Replacement Wood Chipping and Flaking System.
- Raw Board Storage.

- OSB Facility.
- New Warehouse building to north-eastern part of the Kronospan Facility.
- Covered Loading Yard.
- Engineering Store with dedicated apprenticeship workshop.
- 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works.

1.1.5 The locations of the above are shown at **Planning Drawing 1**.

1.1.6 The provision of the north access road is something which has been requested by the local community for several years. The constraints which previously prevented the delivery of this have now been removed and Kronospan has developed a proposal which would remove approximately 750 two-way HGV movements from the residential section of Holyhead Road over a 24-hour period (approximately 600 two-way movements during the daytime period, and approximately 150 two-way movements during the night-time period). This will have a variety of amenity and social benefits to the local community as well as improving the logistics arrangement at the Site.

1.1.7 The Proposed Development would provide enhanced facilities which would help maintain the future viability of the business at the site in Chirk. The investment would ensure the business can continue to meet customer demands in a competitive manufacturing environment, as well as delivering numerous environmental and social benefits. This investment would help to safeguard the significant direct and indirect employment opportunities supported by the business and the wider local and regional economic benefits which result from a major manufacturing business such as Kronospan.

1.1.8 Further details of the need and benefits of the Proposed Development is described at **Chapter 3.0** of this document.

1.2 Scope of the Planning Application

1.2.1 The planning application comprises the following main elements:

- Planning Application Form and Certificates
- Application Validation Statement
- Environmental Statement
- Design and Access Statement
- Pre-Application Consultation Report
- Planning Statement and supporting assessments (technical appendices) comprising:
 - Agricultural Land Classification Survey
 - Flood Consequence Assessment and Surface Water Drainage Strategy
 - Arboricultural Impact Assessment
 - Lighting Assessment
 - Air Quality Assessment
 - Transport Assessment
- Planning Application Drawings

1.2.2 This Planning Statement is divided into seven main sections following on from this introduction.

- Section 2.0 provides a description of the Proposed Development
- Section 3.0 describes the need and benefits of the Proposed Development.
- Section 4.0 summarises the relevant planning history associated with the Proposed Development and the Kronospan manufacturing site.
- Section 5.0 provides a description of the potential environmental effects of the Proposed Development.
- Section 6.0 provides a summary of potential cumulative effects with other schemes.
- Section 7.0 provides a detailed appraisal of the planning policy context against which this application should be determined and assesses the extent to which the Proposed Development accords with that context.
- Section 8.0 provides the conclusions to this statement.

1.2.3 Environmental Impact Assessment Screening

1.2.4 Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (the EIA Regulations) lists categories of developments for which EIA is mandatory, whilst Schedule 2 lists categories of development for which EIA may be required depending upon, inter alia, whether the development is likely to have significant environmental effects.

1.2.5 The Proposed Development is included within Schedule 2 of the EIA Regulations (under Parts 10 and 13 of Schedule 2) as follows:

- *10a. Industrial estate development projects. The area of the development exceeds 5 hectares;*
- *10f. Construction of roads (unless included in Schedules 1). The area of the works exceeds 1 hectare;*
- *13a. Any change to or extension of development of a description listed in Schedule 1 (other than a change or extension falling within paragraph 23 of that Schedule) where that development is already authorised, executed or in the process of being executed. The development as changed or extended may have significant adverse effects on the environment.*

1.2.6 In respect of Part 13a of Schedule 2, the wider Kronospan site is an ‘*industrial plant for the production of paper and board with a production capacity exceeding 200 tonnes per day*’. As such the wider Kronospan site falls within Part 18b of Schedule 1.

1.2.7 The requirement for EIA was confirmed following a formal request for a screening opinion (in accordance with Paragraph 6 (2) of the EIA Regulations), which was submitted to WCBC on 09 March 2022.

1.2.8 A formal screening opinion was issued by WCBC on 05 April 2022 which confirmed that the Proposed Development would fall within Parts 10 and 13 of Schedule 2. The screening opinion provided the following summary statement:

'The proposal will involve a major employment development within a Special Landscape Area, close to a World Heritage Site but not directly affecting the setting of a scheduled ancient monument. It will have an impact on traffic on the local highway network. It has the potential to impact upon protected species. Although the impacts are primarily localised cumulative mitigation could result in significant effects in EIA terms. As such an EIA is considered to be necessary in this instance'.

- 1.2.9 As such, an Environmental Statement (ES) has been prepared to satisfy the requirements of the EIA Regulations.

1.3 The Site and its Context

Application Site

- 1.3.1 The Site of the Proposed Development is to the north of the existing Kronospan Facility, Chirk. It is on the western side of the B5070 Holyhead Road, on land that is presently in agricultural use. The Site has an area of approximately 11.74 hectares (ha). The entirety of the Site is under the ownership of the Applicant.
- 1.3.2 To the east, the Site abuts the B5070. The boundary with the highway is defined by a clipped hedgerow between 1.5m and 2m in height, which largely screens ground level views. To the east of the road, a series of two-storey residential properties at the edge of Chirk face the south-eastern part of the Site boundary. The north-eastern part of the Site faces a field on the eastern side of the road (which is under the control of Kronospan).
- 1.3.3 The northern boundary of the Site is defined by the existing access road to Afon Bradley Farm. This is a farm holding under the control of Kronospan, which includes a single residential property and a series of outbuildings.
- 1.3.4 The Afon Bradley is a small watercourse which runs along the western boundary of the Site and flows northwards into the River Dee. Fields under the control of Kronospan are west of the Afon Bradley. The western edge of these fields is defined by the railway that runs between Chester and Shrewsbury. West of the railway is the Llangollen Canal which forms part of the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS).

- 1.3.5 A sewage treatment works (owned by Dwr Cymru Welsh Water), a gas governor (owned by Wales and West Utilities), and one property (owned by Kronospan), all abut the southern boundary of the Site, with the wider (existing) Kronospan Facility located beyond these.

Wider Site Context

- 1.3.6 The wider Kronospan site covers an area of approximately 41.2 hectares at the western edge of Chirk. It is a well-established industrial facility in operation since the 1970s, and which includes several large industrial process buildings (some with emissions stacks), storage areas for raw materials, warehouse buildings, offices and car parking. Some of the existing structures are large in scale and height. The tallest structures on site are the emissions stack (70m), the WESP stack (65.5m), the MDF cyclones (57m), and the dryer exhaust stack at the wet electrostatic precipitator (WESP) Chip Dryer (50m). Emission plumes from these stacks are often clearly visible from the surrounding area. Surface water for most of the wider Kronospan site currently drains to two lagoons on the northern boundary. A third lagoon was constructed to take surface water from the log yard.
- 1.3.7 Chirk is a small town off the A5 and just north of the England-Wales border (within Wales). The residential areas of the town mostly lie east of the B5070, with the wider Kronospan site to the west of this road. Dense tree planting, some of which is on an earth bund defines the eastern perimeter of the wider Kronospan site and provides effective screening of views from nearby properties.
- 1.3.8 On the western side of the B5070, to the south-east of the wider Kronospan site is an area of greenspace comprising a private sports club (immediately south of the Kronospan car park) and Chirk Recreation Ground. The Cadbury's (Mondelez) factory is immediately south of the wider Kronospan site. Chirk town centre lies south-east of the wider Kronospan site and includes various commercial and community buildings and areas of public open space.

- 1.3.9 The wider area is rural. The landform falls steeply, from the hills to the west towards the much lower-lying Shropshire Plain to the east. Local variations in topography are evident, with a marked rise to a ridge east of the town.
- 1.3.10 To the west of the wider Kronospan site, the land rises towards the foothills of the Welsh mountains. The Llangollen Canal forms part of the Pontcysyllte Aqueduct and Canal WHS. In addition to recognised heritage value, the canal corridor is an important recreational route. The canal passes close to the western boundary of the wider Kronospan site and some of the existing structures and perimeter fencing are visible from it.
- 1.3.11 Beyond the canal, settlement is sparse and land cover comprises a mixture of pasture and small woodlands. Much of this area falls within the boundary of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB). Chirk Castle and its associated grounds (Grade 1 registered) are a notable feature within the landscape. The Castle is owned by the National Trust and is a well-known and well-frequented visitor destination.
- 1.3.12 The development of the wider Kronospan Facility is ongoing, reflecting changes in industrial processes and in market conditions. Several new facilities have been erected in recent years, including new process buildings, new storage facilities and new railway sidings.
- 1.3.13 A condition was attached to several recent planning consents for development at Kronospan which required the development of a landscape strategy to mitigate the visual impact of the wider Kronospan site from public viewpoints. As such, the Applicant submitted a landscape strategy for the area surrounding the wider Kronospan site to WCBC in 2017. The landscape strategy was approved in 2019, and planting has subsequently been carried out within land owned by Kronospan.
- 1.3.14 A series of new or improved facilities at the wider Kronospan site are proposed as part of the Kronospan Vision 2020 investment and development programme. This comprises several major projects, the following of which are operational, under construction, or awaiting construction:
- Log yard silos and recycled wood fibre (RCF) offloading and grading facilities.

- Melamine facing press hall/building.
- Wood chip preparation building and WSEP chip dryer.
- Refurbishment of existing chipper facility.
- Raw board storage (under construction).
- OSB facility.
- North-east Warehouse (under construction).
- Covered loading yard (awaiting construction).
- Engineering stores (new warehouse building at the southern edge of the wider Kronospan site – awaiting construction).
- Two raw materials silos, an extension to the existing chip preparation building and erection of three associated silos (awaiting construction).

Access

- 1.3.15 The existing main site entrance is a T-junction with Holyhead Road (B5070) which runs in a north south direction to the east of the site. The B5070 meets the A5 approximately 1.5km to the north of the site via a roundabout junction, known as Whitehurst Roundabout. Approximately 1km to the east of this roundabout the A5 forms a junction with the A483. The A483/A5 provide links north to Chester, west to Llangollen and south to Shrewsbury. To the south of the manufacturing site, access via the B5070 leads to the A5 via Chirk town centre, this route is restricted to non-HGV traffic (Heavy Goods Vehicle).
- 1.3.16 The proposed north access road would require the creation of a new junction in the form of a roundabout from the B5070 approximately 1.2km to the north of the existing site entrance to the Kronospan Facility (see **Chapter 2.0** of this Planning Statement for further details).
- 1.3.17 The existing railhead and sidings within the site are used to import timber for the manufacturing process as well as import via HGV.

1.4 The Applicant

- 1.4.1 The Applicant is Kronospan Limited. Kronospan has been operating for 52 years (manufacturing for 49 years) at its site in Chirk, Wales. It is the world's leading manufacturer of wood-based panels using advanced technology and has pioneered many of the industry's key advances. The products produced have a wide application across the flooring, furniture, and refurbishment industries.
- 1.4.2 Kronospan is the UK's leading manufacturer of high-quality wood-based panels and associated products and has been operating in the UK since 1970, and the operation in Chirk was the first outside of Austria. The primary products manufactured by Kronospan at the Chirk site are PB and MDF, from which a number of secondary products are produced such as laminate flooring, worktops and melamine faced boards.
- 1.4.3 The Kronospan manufacturing facility is a major local employer within WCBC with the site at Chirk employing over 600 staff. It is estimated that the facility also provides indirect employment to 6,000 people in industries relating to the manufacturing and supply chains associated with the operations at the site.

1.5 Pre-Application Consultation

Wrexham County Borough Council

Pre-Application 1

- 1.5.1 A request for pre-application advice (dated 14 February 2020) was submitted by the Applicant to WCBC for the development of a new private road leading from Holyhead Road to the existing Kronospan facility.
- 1.5.2 WCBC provided a response (reference ENQ/2020/0044, dated 07 January 2022); please see **ES Chapters 5.0 – 8.0** for a summary of the WCBC responses and the subsequent actions with respect to the assessment topics of landscape and visual, historic environment, biodiversity and nature conservation, and noise and vibration.
- 1.5.3 A summary of the WCBC response with respect to policy is provided below:

- The proposed development would constitute inappropriate development in a Green Wedge as defined in paragraph 3.75 of PPW11 and would also represent a significant loss of openness of the Green Barrier in this location.
- The proposed access road and associated parking area would represent a significant intrusion of urban development into the rural landscape surrounding Chirk, which is designated Special Landscape Area. The development will also be situated within the buffer zone for the Pontcysyllte Aqueduct and Canal World Heritage Site Buffer Zone and located outside of but within 600m metres of the Clwydian Range and Dee Valley AONB.
- WCBC is concerned that the development will represent an intrusion of urban development into the rural landscape surrounding Chirk, potentially harming the setting of the World Heritage Site and AONB. It is acknowledged, however, that the impact of an access road, by itself, would be far less than the proposed put forward in your later enquiry reference ENQ/2021/0315.

1.5.4 The above issues are addressed in the planning application, notably the ES, the Planning Statement (and its appendices), and the Design and Access Statement.

1.5.5 The following were identified by WCBC as being required for any future planning application (this was replicated in the pre-application 2 response (see below) - all are provided as part of this planning application):

- Drawings and Site Location Plan.
- Ecology Report.
- Arboricultural Impact Assessment.
- Landscape and Visual Impact Assessment.
- Air Quality Assessment.
- Heritage Impact Assessment.
- Transport Assessment.
- Pre-Application Consultation Report.

Pre-Application 2

1.5.6 A subsequent request for pre-application advice (dated 02 November 2021) was submitted by the Applicant to WCBC for several development proposals to develop and improve the existing industrial facility at Kronospan Limited, Holyhead Road, Chirk. The development proposals subject to the pre-application advice request included the Proposed Development plus other development proposals that have either had planning applications submitted or granted as follows:

- Covered loading yard.
- Engineering stores (new warehouse building at the southern edge of the wider Kronospan site).
- Two raw materials silos, an extension to the existing chip preparation building and erection of three associated silos (and associated works).

1.5.7 WCBC provided a response (reference ENQ/2021/0315, dated 07 January 2022); please see **ES Chapters 5.0 – 8.0** for a summary of the WCBC responses and the subsequent actions with respect to the assessment topics of landscape and visual, historic environment, biodiversity and nature conservation, and noise and vibration.

1.5.8 A summary of the WCBC response with respect to policy is provided below (policy matters set out in the pre-application 1 response were duplicated and are not repeated here – only additional policy matters):

- The potential benefits of removing some vehicles from Holyhead Road in respect of traffic also residential amenity is acknowledged, the proposals lie outside of the settlement limit of Chirk, within a Green Barrier and a Special Landscape Area.
- WCBC is concerned that the development will have a significant and detrimental impact upon the rural landscape surrounding Chirk and will also harm the setting of the World Heritage Site and AONB. The impact of the development is unlikely to be adequately mitigated by landscaping.
- It is acknowledged that TAN23 sets out specific criteria (paragraphs 2.1.6 – 2.1.14) for assessing proposals that are likely to give rise to

environmental harm it is not clear from the information submitted that that economic or other benefits arise from the development to sufficiently outweigh the concerns previously set out.

- It is also acknowledged that policy EM4 of the LDP would permit employment development outside of settlements limits by way of extensions to existing employment sites. Nevertheless, the policy requires it to be demonstrated that there are no suitable alternatives, and that the development forms a logical extension to the existing settlement limit. On the basis of the information before me WCBC does not consider either criterion to have been met. Furthermore, any proposals would also be considered considering LDP policy DM1 which includes similar requirements to policy GDP1 of the UDP in respect of layout, design and landscape impact.
- Whilst it is noted that alternative locations have been considered I do not consider sufficient information has been submitted at this stage to demonstrate that this is the only suitable location for the development or that the need/benefits of the proposals outweigh the harm arising from an incursion of development into the rural landscape, Special Landscape Area and Green Barrier.

- 1.5.9 The above issues are addressed in the planning application, notably the ES, the Planning Statement (and its appendices), and the Design and Access Statement.

Community Consultation

- 1.5.10 The Town and Country Planning (Development Management Procedure) (Wales) Amendment Order 2016 (DMPO 2016), requires the Applicant to consult the public and statutory consultees prior to submitting a planning application for major development.
- 1.5.11 The purpose of this consultation is to provide an opportunity for statutory consultees and the public to review development proposals and to raise any issues, or areas of concern that the developer may need to address before submitting an application.

- 1.5.12 The consultation undertaken by the applicant and the feedback received is described in the Pre-Application Consultation (PAC) Report which has been produced after the consultation. This section of the Planning Statement briefly outlines the consultation that is being undertaken.
- 1.5.13 Community and Specialist consultees have been provided notice in writing of the proposed application in accordance with Article 2D of the DMPO 2016. Community consultees have been provided details of where the draft application was available to view and specialist consultees have been provided with electronic copies of the draft application. Notice has been provided to the Neighbour consultee and four site notices (two in English and two in Welsh) have been posted at locations near the site which have been used by WCBC to post notices of planning applications in the area.
- 1.5.14 The information required to be made available by Article 2C(b)(i-v) was deposited in the form of a draft planning application at Chirk Town Council (Parish Hall House, Holyhead Road, Chirk, Wrexham LL14 5NA) and at the Reception of Kronospan (Holyhead Rd, Chirk, LL14 5NT) and was available for public viewing during regular office hours from 8:30am to 4.30pm on 14 October 2022 until 18 November 2022. A record of visitors was taken at reception.
- 1.5.15 Throughout the consultation period the documents were available at <https://www.chirk-kronospan.info> and <https://www.axisped.co.uk/>.

2.0 THE PROPOSED DEVELOPMENT

2.1 Introduction

- 2.1.1 This section of the Planning Statement provides a summary description of the layout and design of the Proposed Development.
- 2.1.2 A detailed description of the Proposed Development is provided at **ES Chapter 4.0 (Description of Proposed Development)**. Please also refer to **Planning Drawings 1 – 9**.
- 2.1.3 The proposed north access road would require the creation of a new junction in the form of a roundabout from the B5070 approximately 1.2km to the north of the existing site entrance to the Kronospan Facility. This would be at the existing junction with an unnamed road running east near to Lodge Farm Cottage. The new roundabout would allow vehicles travelling to and from the existing Kronospan Facility to enter and exit the B5070 to the north of Chirk, avoiding the requirement for the majority of HGVs accessing the Facility to enter the settlement of Chirk. The proposed route would require the diversion of the existing access to Afon Bradley Farm, which would become an exit from the proposed roundabout. The new access road would lead from the roundabout west and then south across the existing agricultural field, entering the existing Kronospan Facility in the northeast corner of the current operational site.
- 2.1.4 Access and egress to the Site would be via the proposed north access road. HGV access/egress via the existing access off the B5070 would be in exceptional/emergency circumstances only.
- 2.1.5 An area (of approximately 0.87ha) for the parking of HGVs is proposed to the east of the proposed access road and to the west of the B5070. The proposed lorry park would cater for up to 45 HGVs and has been designed so that vehicles can enter and exit the proposed parking spaces in forward gear, without the need for reversing.
- 2.1.6 Approaching the existing wider Kronospan Facility there would be four parallel weighbridges to service incoming and outgoing vehicles. In between the weighbridges is a proposed three storey timber clad building with a

gantry, allowing timber samples to be taken from incoming vehicles for quality checking.

- 2.1.7 A proposed staff and visitor car park would be to the south of the proposed lorry park and immediately east of the proposed weighbridges. A single-storey facilities block for the lorry park would be north of the staff and visitor car park.
- 2.1.8 From the weighbridge, vehicles would continue south going to the east of the existing Gas Governor, entering the existing Kronospan Facility between the East Logyard (where the new East Warehouse is currently under construction) and Kronoplus. A route north towards the proposed roundabout and out of the Proposed Development Site would be to the west of the Gas Governor, immediately to the north of the Kronoplus building.
- 2.1.9 Vehicles exiting the Site would follow the route described above, with both lanes merging before the 'out' weighbridge', and then routing north to the new roundabout junction. There would be an access to the proposed 132kV substation, described below.
- 2.1.10 The proposed 132kV substation would cover a broadly rectangular area and would be constructed where possible from permeable materials (such as gravels or stones). Bund walls would be constructed around some of the proposed equipment to provide protection from vehicles on the adjacent access road. Two fire walls would be located adjacent to the two main transformers. An access road would be provided around three sides of the equipment, with an area for parking. A substation building and a building for ancillary equipment would also be constructed. The substation would be surrounded by palisade security fencing and floodlights would be provided.
- 2.1.11 Two proposed roundwood storage areas are proposed. One storage area would be immediately north of the proposed 132kV substation and west of the proposed weighbridge and would cover an area of approximately 0.41ha. The second storage area would be south of the proposed weighbridge car park and south-east of the proposed weighbridges and would cover an area of approximately 0.3ha.

- 2.1.12 Both proposed roundwood storage areas would provide temporary storage for imported logs (maximum storage height of 4m), prior to being moved to other facilities within the wider Kronospan Facility for processing.
- 2.1.13 Appropriate signage would be constructed at the proposed roundabout (and on the approach to the Proposed Development off the roundabout) to instruct and inform HGVs, visitors and contractors of the presence of and permanent access arrangements for the Kronospan Facility.
- 2.1.14 The Proposed Development would include landscape and ecological mitigation intended to reduce the visual effects of the new structures and vehicle movements and to enhance biodiversity. Measures to manage surface water flow, including two new drainage basins, would also be provided.
- 2.1.15 It is anticipated that construction would occur between Quarter 2 2024 and Quarter 3 2027. An indicative programme is set out in **ES Chapter 4.0 (Description of the Proposed Development)**. There would be overlap between some of these activities, and the majority of construction works, (i.e. from the start of site clearance to the completion of the roundwood storage areas and weighbridge car park) would last for approximately fifteen months in total.
- 2.1.16 Construction of the proposed 132kV substation would take place after all the other elements are built and in operation.

3.0 NEED AND BENEFITS OF THE PROPOSED DEVELOPMENT

3.1 Introduction

3.1.1 The Proposed Development forms part of a range of projects that have been proposed by Kronospan over recent years to improve the sustainability of operations at the Chirk manufacturing facility. The enhancements undertaken at the Site to date have enabled it to deliver continuous environmental improvement whilst maintain the manufacturing efficiencies required to sustain an economically viable business in the short, medium and long term. The recent improvements were delivered as part of the Kronospan Vision 2020 programme which involved the business investing £200 million in the site in Chirk since 2015.

3.1.2 The most recent developments at the Site have helped deliver a more efficient manufacturing process, responding to the evolving nature of customer demands. The Chirk facility can now offer a greater range of products than was previously the case and the business is continuing to deliver new and upgraded facilities required to meet future customer demands. The investments made will help secure the jobs and financial benefits that the business brings to the local economy.

3.1.3 To ensure that Kronospan maintains its position in a competitive market, delivers its products in a more sustainable way and make improvements to its impacts on the local community further investment at the Site is required.

3.1.4 This section of the Planning Statement examines the need for the Proposed Development and the benefits that it will deliver to Chirk, Wrexham and Wales.

3.2 Background

3.2.1 Kronospan is a leading producer of wood-based panels and has operated from Chirk since the 1970's. The Site manufactures wood-based panels and other wood products.

3.2.2 The Site is ideally located for the production of wood-based board due to the presence of the railway head within the facility which is connected to the Chester to Shrewsbury rail line. The railway head enables the delivery of round wood (small logs) to the manufacturing site via rail and therefore

reduces the reliance of the facility on HGVs for the delivery of raw material. However, the delivery of wood to the Site and export of manufactured products to clients from the Site remains heavily dependent on HGVs. As such Kronospan has examined ways in which the impacts from this form of transport can be reduced, discussed further below.

3.2.3 Kronospan are an important local employer providing direct employment for over 660 people, the majority of whom live locally, and paying over £1.5million in net wages every month. Since establishing the business in Chirk 50 years ago Kronospan has invested over £1 billion through direct capital investment and asset maintenance. This has led it to become the 9th largest manufacturing business in Wales, delivering hugely significant employment and training benefits to the North Wales region.

3.2.4 In addition to the economic benefits accrued through the payment of wages, capital expenditure and maintenance costs, the business also makes a significant contribution to the local and national economy via business rates and corporation tax. Annually the business contributes over £1 million through business rates and since 1970 the business has paid £57 million in corporation tax.

3.2.5 In this regard the ongoing operation of the facility at Chirk is undoubtedly a vitally important element of the local, regional, and national economy.

3.3 Kronospan Vision 2025

3.3.1 Following on from Kronospan's Vision 2020 the company has embarked on the delivery of Vision 2025 (see **Annex A** of this Planning Statement) which is constructed around strategic goals, each with a series of objectives and detailed work streams.

3.3.2 Vision 2025 will adapt the site at Chirk to changes in the UK market for wood-based panel products ensuring it is able to sustainably fulfil the requirements of its customers and stakeholders. Some of the larger projects planned to deliver Vision 2025 (excluding those already described at **Section 1.3** of this document as part of Vision 2020) include:

- North access road.
- 132kV connection and solar plant.

- Electrification of the forklift truck (FLT) fleet.
- National network of 'Urban Forest' timber recycling centres.

3.3.3 Sustainability sits at the core of Kronospan's Vision 2025 strategy and has become a cornerstone of the Company's forward strategy. In delivering Vision 2025 the Company is seeking to achieve:

- Economic sustainability – delivering a profitable and growing business.
- Environmental improvement – reducing our impact and supporting UK Net Zero targets through production of sustainable products and operations.
- Social benefit – maximising the value of our teams and developing our role in the community.

3.3.4 Supporting the Vision 2025 strategy will be an annually published Environmental Social Governance (ESG) report for Chirk, assessing the Company's performance against the ESG targets in development through Vision 2025.

3.4 132kV Substation

3.4.1 The primary products manufactured at the Site are particle board and medium density fibreboard MDF, from which several secondary products are produced such as laminate flooring, worktops and melamine faced boards (MF). The site will also begin to install plant and manufacture OSB once the NRW operational permit for OSB production has been issued.

3.4.2 The manufacturing processes which take place at Kronospan require large quantities of heat and electricity. The high voltage electricity network in this part of Wales is sub-standard for the level of demand it is required to meet.

3.4.3 Regular maintenance has to be undertaken by the District Network Operator (DNO) to the local grid infrastructure to ensure it continues to supply the needs of Chirk and the surrounding area. During periods of maintenance the supply of power to the Site can be severely affected, this in turn has a significant impact on manufacturing operations at the Site.

- 3.4.4 Due to the fragility in the local grid Kronospan is only licensed to draw approximately 55% of their total demand from the grid. To meet its power demands, safeguard against the fragility of the local electricity grid, and reduce the risk of the local grid hindering the manufacturing efficiency of the site, Kronospan has installed its own power generation facilities at the Site.
- 3.4.5 A proportion of the power generation comes from an onsite biomass plant, which generates renewable energy. However, to meet the required demand, it has been necessary to install a series of natural gas engines. Whilst the installation of newer, more efficient gas engines in recent years has helped to reduce the carbon intensity of the operations at the Site, reliance on fossil fuel-based energy is not seen as the long term future for business.
- 3.4.6 In 2017 the Welsh Government set a target of meeting 70% of Wales' electricity demand from Welsh renewable electricity sources by 2030¹. In 2019, it was estimated that over half (51%) of Wales' energy needs were met through renewable energy generation. As such there is clear ambition to significantly decarbonise the electricity grid in Wales providing the opportunity for businesses such as Kronospan to lower their carbon footprint. However, in order to benefit from this low carbon electricity, it is necessary for the grid infrastructure to be reinforced, not only to allow more renewable generation to connect to the grid but also for the grid to be resilient enough to supply power the business which need it. At present Kronospan cannot draw sufficient electricity from the local network for its operations due to the fragility of the local distribution network. Hence the business is reliant on on-site fossil fuel based power generation.
- 3.4.7 A report published by the Climate Change, Environment, and Infrastructure Committee of the Welsh Parliament in May 2022 identified that *"Wales' grid infrastructure is not fit for purpose. It is holding back renewable energy development. It requires investment, reinforcement and upgrading."* The report goes on to acknowledge that *"more needs to be done, and as a matter of urgency, to address current grid capacity issues."*²

¹ Welsh Government press release, Cabinet Secretary for Environment Lesley Griffiths , September 2017

² Renewable Energy In Wales, Welsh Parliament Climate Change, Environment and Infrastructure Committee, May 2022.

3.4.8 As such it is clear that there is a need for investment in new grid infrastructure, Chirk being a prime example of this. Kronospan has been working with the DNO to identify how the current local grid issues can be resolved. This has resulted in the proposal to develop a new 132kV substation at the site, which will enable Kronospan to connect directly into the strategic 132kV overhead line that runs from Oswestry to Legacy, Wrexham. To expedite the connection, Kronospan would construct the proposed 132kV substation.

3.4.9 This new connection would mean that Kronospan would no longer be reliant on the aging 33kV infrastructure which provides power to other business, community facilities and residential properties in Chirk. This has a range of positive consequences to Kronospan and the community of Chirk as follows:

- Kronospan could reduce reliance on the onsite fossil fuel energy generation by drawing more from the electricity network, which as described above is on a path to a low, and eventually zero, carbon future. Based on the most recent emissions data for the facility this could lead to a 59% reduction in carbon emissions by 2030, with even greater reductions as the grid mix decarbonises further.
- Kronospan will not be susceptible to intermittent constraints on the power it sources from the local grid, helping to maximise the manufacturing efficiency from the plant.
- The new connection and reliability that it would provide will enable investment to be made in future manufacturing lines essential to the future success of the business e.g. OSB production.
- A new connection would enable Kronospan to invest in renewable energy projects on site such as solar PV, helping to contribute to the low carbon future for the plant.
- The new substation would reduce the strain on the existing local 33kV network helping to provide a greater security of supply to local business and residents.
- Reduce the risk of intermittent or even catastrophic failure of the local 33kV network which supplies essential infrastructure such as Chirk Community Hospital.

- The reduced demand on the local grid would enable Chirk to implement Electrical Vehicle charging schemes and open the opportunity for local community based solar schemes to connect into the grid which currently does not have the capacity to facilitate these Net Zero projects.

3.4.10 In summary the provision of a new 132kV substation would have several advantages which would translate to benefits to the community of Chirk and result in a significant reduction of carbon dioxide generated from the Site, helping to meet the Welsh Government's Net Zero targets.

3.5 North Access Road

3.5.1 As set out above Kronspan has reduced their reliance on road transport by investing in improved rail sidings and thereby allowing more roundwood to be delivered to Site by train. However, the extent to which the use of rail can be increased in the future is limited by capacity issues on the local rail network. Some of the investments being made at Kronopsan will also help reduce vehicle movements through more efficient product handling e.g. development of the raw board and paper warehouse. However, despite such initiatives there will be a continued requirement for transport of raw material and manufactured goods via road.

3.5.2 As described in the Transport Assessment (**Planning Statement Appendix F**) approximately 24 - 28 HGVs access (and then later egress) Kronospan via the existing Holyhead Road entrance during each of its AM and PM peak periods (07.00-08.00 and 14.00-15.00). Whilst Holyhead Road is of a suitable standard to be used by HGVs, and there have been no capacity issues on the network, there have been historical concerns raised by the local community associated with HGVs travelling through the residential area of Chirk. These concerns primarily relate to amenity issues such as noise, air quality and dust.

3.5.3 The local community have previously requested that Kronospan investigate the potential for a new access to be provided to the Site from the north. Unfortunately, this has not been possible in the past due to landownership constraints and the flow of materials and product within the manufacturing site.

- 3.5.4 Recently Kronospan have negotiated the purchase of land which could unlock the potential for a north access. Allied to this the investment over the past 10 years, along with the ongoing improvements at the Site have enabled the process flow within the Site to be arranged in such a way that it would facilitate an access to the north.
- 3.5.5 As described in **ES Chapter 3.0 (Alternatives)** several options were explored to deliver an access to the north. The proposed solution provides sufficient parking for HGVs, manoeuvring requirements of the vehicles entering and leaving the Site and adequate weighbridge facilities. Furthermore, on the basis that one of the main objectives of the proposals was to reduce amenity and environmental impacts of the businesses, the design took into account the proximity of housing and has integrated landscaping measures to reduce the visibility of the development from nearby receptors.
- 3.5.6 There are a range of benefits that stem of the new access road arrangements as follows:
- The proposed access would remove approximately 750 two-way HGV movements (over a 24-hour period) from the residential areas of Chirk which front onto Holyhead Road.
 - This reduction will lead to a range of amenity benefits such as:
 - reduced noise impacts;
 - improvements in air quality resulting from reduced exposure to vehicle emissions;
 - reduction in direct dust/particulates associated with deposits/emissions from HGVs
 - reduction in indirect dust/particulates mobilised by HGVs passing receptors.
 - With respect to noise and vibration, neutral to moderate benefits are anticipated for receptors experiencing road traffic noise due to the HGV traffic no longer travelling past the residential areas down the B5070. Associated beneficial effects with respect to air quality are anticipated for the same reasons.
 - Whilst there are no records of safety incidents on Holyhead Road relating to Kronospan traffic, it is well recognised that HGVs traffic has

perceived and actual impacts on pedestrians and cyclists. Reducing the number of HGVs on the residential stretch of Holyhead Road would improve pedestrian and cyclist enjoyment and may encourage greater use by virtue of a perceived reduction in safety concerns.

- The introduction of a roundabout on Holyhead Road in advance of entering the residential area of Chirk will help reduce vehicle speeds. It is understood that at present this section of road experiences relatively high vehicle speeds, which are anecdotally often in excess of the speed limit of 50 mph in this location.
- The introduction of a compact roundabout (instead of a standard roundabout design) is sufficient for the Proposed Development and necessitates a reduction in the speed limit along the B5070 from 50 miles per hour (mph) to 40mph to ensure compliance with the Design Manual for Roads and Bridges.
- The relocation and development of new weighbridge facilities as part of the new access road will improve the flow of traffic to the Site and away from the main pedestrian and staff entrance, improving the safety and wellbeing of employees and visitors.
- At present, the HGV parking provided on the existing Kronospan Facility is adequate for peak time deliveries. However, Kronospan manages the HGV flow into the site using relatively constrained time windows to ensure HGV queuing is limited and that adequate short-term parking is available. As such vehicles which arrive in the local area in advance of their predefined time slots are required to use parking facilities on the trunk road network. Improved HGV parking facilities at the Proposed Development Site (which would remain short term) would enable wider delivery slots to be created which would help reduce congestion of existing parking areas on the local trunk road network.
- The Proposed Development would enable the existing HGV parking area at the site entrance to be re-purposed in the future for improved staff, visitor and contractor car parking. Improving the working conditions for employees and enhancing the appearance of the entrance to the facility.

3.6 Summary

3.6.1 Kronospan has invested significantly in the Chirk manufacturing site in recent years to deliver environmental benefits and maintain the future sustainability and viability of this major regional employer.

3.6.2 As Kronospan looks to the future the Company recognises that further investment is required to meet its Vision 2025 ambitions which are to deliver:

- Economic sustainability – delivering a profitable and growing business.
- Environmental improvement – reducing our impact and supporting UK Net Zero targets through production of sustainable products and operations.
- Social benefit – maximising the value of our teams and developing our role in the community.

3.6.3 One of the key constraints limiting the operational efficiency of the Site is the fragility of the local electricity distribution network. The constrained supply of electricity from grid also limits the ability of the business to decarbonise. The proposed new 132kV substation would allow a connection to be made to the nearby strategic high voltage electricity line which runs from Oswestry to Legacy, Wrexham. This brings with it several benefits to local community by reducing the demand on the local network, mitigating the potential for local network failure, improved reliability for other businesses and community facilities and enhancing the opportunity for EV charging and provision of local renewable energy in Chirk. Removing reliance on the local distribution network would mean that Kronospan has a dependable power supply which will improve the operational efficiency of the Site, reduce the current dependence on the onsite fossil fuel-based generation facilities and enable the deployment of renewable technologies such as on-site PV electricity generation.

3.6.4 The provision of the north access road is something which has been requested by the local community for several years. The constraints which previously prevented the delivery of this have now been removed and Kronospan has developed a proposal which would remove approximately

750 two-way HGV movements from the residential section of Holyhead Road over a 24-hour period (approximately 600 two-way movements during the daytime period, and approximately 150 two-way movements during the night-time period). This will have a variety of amenity and social benefits to the local community as well as improving the logistics arrangement at the Site.

- 3.6.5 In conclusion the Proposed Development would provide enhanced facilities which would help maintain the future viability of the business at the site in Chirk. The investment would ensure the business can continue to meet customer demands in a competitive manufacturing environment, as well as delivering numerous environmental and social benefits. This investment would help to safeguard the significant direct and indirect employment opportunities supported by the business and the wider local and regional economic benefits which result from a major manufacturing business such as Kronospan.

4.0 PLANNING HISTORY

4.1 Introduction

- 4.1.1 Prior to the 1970s, the existing Kronospan Facility was greenfield agricultural land and included a farmhouse. The farmhouse still forms part of the offices of Kronospan. The site at Chirk was chosen because of its central location between its main customer base and its plentiful supply of raw materials.
- 4.1.2 The construction of the first factory building commenced in 1971 and the company began operating in 1973. In the late 1980s, the company bought the factory next door, and this has since been extended to provide the base for the company's *Kronoplus* operation, which produces laminate flooring and worktops.
- 4.1.3 Over the past 10 years Kronospan has started a modernisation and improvement programme which has involved the development of a series of facilities intended to deliver efficiency and environmental improvements to the site and neighbouring residential areas. **Table 4.1** below summaries the planning history at the site since 2012.

Table 4.1: Relevant Key Kronospan Developments in the Last 10 Years

Application Ref.	Proposal	Decision
P/2012/0165	Development of biomass plant, recycled wood fibre (RCF) offloading & screening facility & associated infrastructure to support existing production operations	Approved - 14 September 2012
P/2013/0824	Development of biomass plant comprising biomass boiler & furnace ash, handling facility & flue, gas treatment facility including stack & air pollution control, reagent storage silos, recycled wood fibre offloading & screening facility, biomass storage area & associated infrastructure (substitution of planning permission code P/2012/0165)	Approved - 07 May 2014
P/2014/0215	2.5m diameter by 7m high extension to existing 15m high abatement stack.	Approved 2 June 2014

Application Ref.	Proposal	Decision
P/2015/0728	Erection of building to contain three gas engines and three steam boilers, erection of electrical substation building, oil tank compound, a duct from the press abatement system to carry process emissions to the SEKA (WESP) stack and associated infrastructure to support existing operations.	Approved - 4 Jan 2016
P/2016/0219	Construction and Operation of a Recycled Fibre (RCF) Reception Facility, Grading Plant, Storage Silos and Other Associated Infrastructure (referred to as the log yard RCF project).	Approved – 3 May 2016
P/2016/0336	Extension of a building to house a new melamine facing (MF) press following the demolition / relocation of the existing MF department's ventilation system, hydraulic oil and diesel storage tanks, a vehicle filling station, garage service building and other associated infrastructure.	Refused – 5 September 2016 Granted at Appeal – 4 May 2017 (Reference APP/H6955/A/16/3165368)
P/2016/0534	Proposed building extension to store medium density fibreboard (MDF) and chipboard.	Refused – 05 September 2016
P/2017/0416	Replacement of existing wood chip preparation facility and development of a new wood chip dryer and associated equipment.	Approved – 31 July 2017
P/2017/0700	Development of a raw board store	Refused – 6 November 2017 Granted on Appeal – 22 May 2018 (Reference APP/H6955/A/18/3193142)
P/2017/0699	Development of a log delivery and transfer system and buildings to house a replacement wood chipping and flaking system and demolition of existing debarking and chipping facilities.	Granted – 1 May 2018
P/2018/0551	Development of an orientated strand board production facility	Granted on Appeal (against non-determination) – 9 October

Application Ref.	Proposal	Decision
		2019 (Reference: APP/H6955/A/19/3227571)
P/2019/0505	Development of a building containing 2 no. gas engines each with a maximum electricity generating capacity of 9.73 Mw, 2 no. steam boilers, roof mounted coolers, walkway between an adjacent building and the proposed building, exhaust gas offtake pipe	Granted – 2 March 2020
P/2021/0725	Development of a warehouse and ancillary works	Granted – 13 April 2022
P/2022/0336	Demolition of reception building and erection of covered loading yard, reception building and associated fencing and ancillary works	Granted – 4 July 2022
P/2022/0615	Erection of engineering store and apprentice workshop (use class b2) and ancillary works	Granted – 7 November 2022
P/2022/0765	Erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works,	Granted – 9 January 2023

4.1.4 In conclusion, the planning history identifies that:

- The existing Kronospan Facility has a long history of planning consents and applications for large industrial development.
- There have been several planning applications relating to development such as the biomass plant, extensions to existing buildings, gas engines, temporary stacks, new silos, fencing and signage.
- The planning consents include permissions for tall stacks, new buildings and wood processing plant.
- Several applications have received planning permission for projects included in the Kronospan Vision 2020 strategy.

5.0 ENVIRONMENTAL EFFECTS

5.1 Introduction

- 5.1.1 The following sections summarise the findings of the ES topic chapters together with the environmental assessments that are appended to this Planning Statement.

5.2 ES Chapter 5.0 - Landscape and Visual

- 5.2.1 Chapter 5.0 of the ES, along with the accompanying Figures and Appendices, comprises the Landscape and Visual Impact Assessment (LVIA) of the Proposed Development. The LVIA addresses the potential landscape and visual effects of the Proposed Development during construction and operation and follows best practice guidance set out in *Guidelines for Landscape and Visual Impact Assessment*³ (GLVIA).
- 5.2.2 The Proposed Development would be introduced into what is presently an undeveloped area immediately north of the existing Kronospan Facility at the edge of Chirk. A series of relatively small new structures would be introduced towards the southern boundary of the Site. A new access road from the B5070 and new lorry parking would be introduced further to the north. A new roundabout would be constructed on the B5070, and part of the existing road would be realigned to accommodate this. The developed Site would be enclosed by a combination of new planting and an earth bund along the eastern perimeter. The landscape proposals would also include new hedgerows, new species-rich grassland and new wetland vegetation. There would be an overall net gain in tree cover as a result of the Proposed Development.
- 5.2.3 During the construction period the nature, location and intensity of activities is likely to vary. A range of features are likely to be present on a temporary basis, which would contrast with their surroundings. There would be significant effects upon landscape character within the Site and along the B5070 corridor. Significant visual effects would be experienced by users of the B5070 and by residents at Lodge Farm Cottage, Parkgate Cottage.

³ Landscape Institute and Institute for Environmental Management and Assessment, 3rd edition 2013. *Guidelines for Landscape and Visual Impact Assessment*. Abingdon: Routledge.

These effects would relate chiefly to highways works which are expected to last for approximately nine months. Properties along the B5070 at the edge of Chirk would also experience significant visual effects resulting from the visibility of activities within the Site for the fifteen-month period when the majority of construction activities would take place.

- 5.2.4 The Proposed Development would result in the removal of existing grassland, hedgerows and tree cover within the footprint of the proposals. There would be an initial significant adverse effect upon woodland due to the loss of existing tree cover. However, there would be an overall net gain in native woodland following the implementation of proposed new planting. As such, longer term effects would be significant and beneficial. Other changes in landscape fabric would not be significant.
- 5.2.5 Effects on landscape character would not be significant. The proposed new features that would be introduced would be less prominent than the far larger existing industrial structures. Their presence would result in a localised sense of urbanisation at the northern edge of Chirk, which would be limited in extent and intensity by a combination of landform and existing and proposed vegetation cover. Woodland recently planted by the Applicant (as part of the Kronospan Landscape Strategy) would reduce visibility as vegetation establishes (and this is already beginning to occur from some locations such as along the Canal corridor). Further new planting associated with other recent Kronospan development proposals, and with the Proposed Development would provide further screening. This planting would help to limit the visibility of the Proposed Development, in accordance with published guidelines for the Landscape Character Area.
- 5.2.6 Significant visual effects would occur at only one of the twenty Viewpoints included in the LVIA, and this effect would occur in the short-term only. This significant effect would occur from a Viewpoint on the B5070 close to the location of the proposed new roundabout and would occur due to the changes to the highway corridor and loss of nearby tree cover. As new planting establishes, the intensity of the effects would reduce to non-significant levels.
- 5.2.7 None of the viewpoints would experience significant visual effects in the medium and longer-term. At five of the viewpoints, the Proposed

Development would not be visible at all due to a combination of intervening landform and vegetation cover, and at four further viewpoints, the Proposed Development would only be visible in the short-term before new woodland planting would wholly screen views.

- 5.2.8 Short-term significant visual effects are also likely to be experienced by residents in nearby properties at the edge of Chirk. Residents at Bryn Hyfryd west of the B5070 and in properties along Wern, Offa and Linden Avenue east of the B5070 would have views of the proposed new features from first floor windows. As proposed new planting establishes, this would break up these views, and the intensity of the effects would reduce.
- 5.2.9 From Chirk Castle, views of the Proposed Development would be available from the northern and north-eastern edge of the Castle including the pathways around the entrance and the roof. The new features would be well screened by intervening vegetation and where visible would be a minor background feature. Views would also be available from a short section of the permissive path that runs east from the Castle, and from this area proposed planting would provide some partial screening of views in the medium and longer-term. The amenity of visitors to the Castle would be unaffected by the limited changes in view that would occur.
- 5.2.10 From the Llangollen Canal corridor, there would be very little visibility of the Proposed Development. Occasional glimpsed views would be available in winter from locations east of the Marina. The equivalent summer views would be wholly screened by vegetation. Recent planting implemented by the Applicant (as part of the Kronospan Landscape Strategy) and new planting proposed as part of the Proposed Development would provide all year-round screening once this has established. Elsewhere along the Canal corridor, existing vegetation, the railway embankment and the canal cutting would screen views.
- 5.2.11 The lighting proposals for the Proposed Development would be designed in accordance with current good practice. They would ensure that any spillage of obtrusive light outside of the Site boundary would be minimised. Lighting is already present in the surrounding area and there would be only limited change from baseline. Night-time landscape and visual effects would not be significant.

- 5.2.12 The Proposed Development would be visible from some locations within the Clwydian Range and Dee Valley AONB. However, the new features would be limited additions, located towards the rear of the view, and their presence would not result in any notable change in the nature of the views available looking out across what is a predominantly agricultural landscape. The statutory purposes of the AONB would not be materially affected by the presence of the Proposed Development.
- 5.2.13 The Site is located within a local Special Landscape Area (SLA) designation maintained by WCBC. The Proposed Development would be well enclosed by proposed planting and by the proposed earth bund along the eastern perimeter. This would greatly restrict the influence that it would have outside of the Site boundary, including from within the remainder of the designation. In the wider context, the landscape of the SLA would undergo little change. The Site and its surroundings do not fall within the revised SLA boundary proposed as part of the Local Development Plan (LDP).
- 5.2.14 Cumulative landscape and visual effects that could occur in a scenario where other consented and proposed development schemes are also present would not be significant. The presence of other developments within the existing Kronospan Facility and of the indicative 132kV underground cable route would have no influence of note upon the effects of the Proposed Development.

5.3 ES Chapter 6.0 - Historic Environment

- 5.3.1 Chapter 6.0 of the ES, along with the accompanying Figures and Appendices, addresses the potential impacts that the Proposed Development would have on the archaeological and historical resource of the area. To do so, it has been guided by present legislation concerning heritage and archaeology, and by several guidance documents including local, national and international guidelines dealing with the management of WHS.
- 5.3.2 A desk-based assessment, settings assessment and Heritage Impact Assessment has been undertaken to provide an assessment of baseline conditions, and a geophysical survey and trenched evaluation has been undertaken within the Site.

5.3.3 As a result of the above, baseline conditions for the historic environment comprise:

- No designated heritage assets are located within the Site.
- Within the extended study area there are 10 scheduled monuments (of which one is also the Pontcysyllte Canal and Aqueduct World Heritage Site and six relate to sections of Offa's Dyke), 18 listed buildings (including Grade I listed Chirk Castle, 2km to the south-west of the Site), one conservation area and five registered parks and gardens (including the Grade I designed landscape at Chirk Castle).
- There are 54 non-designated historic assets within 500m of the Site (including Afon Bradley farm which is a non-designated historic farm complex to the immediate east of the Site).
- Field surveys identified one new non-designated historic asset within the Site, the remains of a limekiln.

5.3.4 The majority of the relevant mitigation measures are embedded into the design of the Proposed Development, and form part of the Illustrative Landscape Masterplan (**Figure 4.3a**), which would reduce or eliminate potentially adverse historic environment effects. Additional mitigation measures are proposed, comprising safeguarding during construction for the limekiln identified within the Site.

5.3.5 The level of residual effect level of residual effect, after the implementation of the embedded and additional mitigation measures is predicted to be:

- Neutral in relation to the limekiln, as the design of the Proposed Development has been amended to avoid the feature;
- Minor adverse in relation to non-designated Afon-Bradley farm complex, resulting from development within the setting of this asset;
- Minor adverse in relation to Pontcysyllte Canal and Aqueduct WHS/ SM, as a result of limited changes to the setting of the asset;
- Minor adverse in relation to Chirk Castle, Grade I listed building and Chirk Castle Grade I registered park and garden; and
- A neutral effect in relation to Offa's Dyke scheduled monument.

- 5.3.6 None of the predicted residual effects in relation to the historic environment are significant.

5.4 ES Chapter 7.0 - Biodiversity and Nature Conservation

5.4.1 Chapter 7.0 of the ES, along with the accompanying Figures and Appendices, addresses the potential effects on biodiversity during construction and operation of the Proposed Development. Effects have been assessed in accordance with guidance set out in *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.1* (2018, Chartered Institute of Ecology and Environmental Management)

5.4.2 A series of measures would be enacted during both the construction of the Proposed Development and once operational to mitigate against potentially adverse effects. These measures include:

- Appointment of an Ecological Clerk of Works to ensure that biodiversity and nature conservation issues are managed appropriately during construction.
- No works to existing trees and hedges during bird nesting season.
- Protection of retained vegetation during the construction period, including trees with bat roost potential.
- Pre-construction surveys for protected species including otter and badger.
- Use of reasonable avoidance measures to prevent harm to reptiles and amphibians.
- Landscape proposals including the creation of new higher value habitats, which will be managed throughout the lifetime of the Proposed Development.
- Following best practice guidance to control pollution resulting from dust emissions, run-off and spills during construction.
- The design and implementation of lighting that is sensitive to the needs of wildlife during construction and once operational.
- A sustainable urban drainage system to control surface-water run-off from the Site; and
- Provision of bird and bat boxes on Kronospan land.

- 5.4.3 The construction and operation of Proposed Development would not give rise to any effects on statutory or non-statutory designated sites for nature conservation.
- 5.4.4 Construction activities would have a minor adverse effect upon priority habitats, due to the loss of approximately 750m of hedgerow. Once operational, approximately 1.28km of new hedgerow would be planted, and this would result in a minor beneficial effect.
- 5.4.5 Other vegetation within the Site is of low ecological value. As part of the Proposed Development, there would be a net loss in vegetation cover overall. However, the provision of newly created woodland, wildflower grassland and wetland would result in the creation of higher value habitat, and the effects of this would be minor beneficial.
- 5.4.6 Implementation of the landscape proposals would result in a minor beneficial effect for breeding birds. The overall net gain in tree and hedgerow cover within the Site would provide increased nesting opportunities.
- 5.4.7 Construction activities would result in a minor adverse effect on foraging and commuting bats due to the loss of vegetation. There would also be a minor adverse effect on roosting bats, due to increased noise levels. Following the implementation of the landscape proposals, effects would be negligible.

5.5 ES Chapter 8.0 - Noise and Vibration

- 5.5.1 Chapter 8.0 of the ES, along with the accompanying Figures and Appendices, assesses the impact of the Proposed Development with regard to noise and vibration. It describes the methods used to assess the impacts, the baseline conditions that currently exist at the site, the potentially affected noise sensitive receptors, the possible direct and indirect impacts arising from the Proposed Development, and the mitigation measures that would be implemented to reduce noise impact from the Proposed Development.
- 5.5.2 Noise and vibration levels have been considered and assessed during the construction and operational phases of the Proposed Development. Relevant and appropriate noise and vibration guidance and standards have

been used to determine the impact. The assessment has been undertaken to inform and guide the design of the Proposed Development, such that any likely noise and vibration impact on existing and potential sensitive receptors is minimised.

- 5.5.3 To establish any likely impact from noise a robust assessment of baseline sound levels has been considered by undertaking fixed position noise monitoring at 11 noise sensitive receptor areas around the Site, over a period of a week or a 5-day period including a weekend.
- 5.5.4 In accordance with appropriate standards, best practicable means (BPM) would be employed to control the noise generation during the construction period. Measures would include restriction on operating hours, screening measures, sensible routing of equipment to site and appropriate site management and liaison with residents to minimise and control noise. Such measures would be defined within the CEMP.
- 5.5.5 In relation to the operational phase, additional mitigation measures (including permanent screening at the proposed lorry park area and permanent screening close to the property of Bryn Hyfryd) are proposed to ensure that the resultant operational noise levels are within appropriate guidance and standards. The measures would be based on the employment of best available techniques (BAT) to mitigate any potential peak noise sources.
- 5.5.6 The assessment shows that there would be no significant impacts during the construction or operation of the Proposed Development following the implementation of appropriate mitigation.
- 5.5.7 The introduction of the lorry park results in HGVs being able to avoid the need to travel through part of Chirk town centre and the assessment shows that road traffic noise levels would be perceptibly reduced for those NSRs nearest to the existing entrance and north of the entrance off Holyhead Road. The Proposed Development therefore provides a beneficial effect with respect to noise.

5.6 Planning Statement Appendix A - Agricultural Land Classification Survey

- 5.6.1 The Agricultural Land Classification Survey Report shows that the entirety of the Proposed Development Site is Grade 3b agricultural land. Its loss to the Proposed Development is not considered to be detrimental due to its relatively small footprint and the vast amounts of agricultural land in the surrounding area, including land of greater agricultural quality.

5.7 Planning Statement Appendix B - Flood Consequence Assessment and Surface Water Drainage Strategy

- 5.7.1 Flooding from tidal and seas, surface water/pluvial flooding, groundwater, sewer and water mains, reservoirs, canals and artificial sources, and infrastructure failure have all been screened and are considered not to represent a significant flood risk. The Proposed Development includes an increase in impermeable coverage, which if unmitigated could result in increases in the peak runoff rates from the Proposed Development Site. Therefore, the following SuDS Sustainable Drainage Systems (SuDS) features are proposed:

- Permeable paving underlain by geo-cellular crates.
- Two attenuation basins.

- 5.7.2 The water would be discharged from the attenuation basins at a controlled rate into the Afon Bradley in the north-west of the Site.

5.8 Planning Statement Appendix C - Arboricultural Impact Assessment

- 5.8.1 A tree survey in accordance with BS5837:2012 (Trees in Relation to Design, Demolition and Construction – Recommendations) was undertaken. The survey recorded a total of 159 tree records which may be influenced by the Proposed Development.
- 5.8.2 Trees recorded include 121 trees, 21 tree groups and 18 hedges. One tree was recorded as Category A (T116), 36 trees were recorded as Category B, 121 trees as Category C and one tree as Category U.
- 5.8.3 A total of 88 trees, six complete tree groups, two part tree groups, six complete hedges and six part hedgerows would need to be removed to facilitate the Proposed Development. Five trees would require need pruning and/or tree protection barriers.

5.8.4 An extensive replanting programme has been developed to compensate for expected tree loss (see Illustrative Landscape Masterplan at **Planning Drawing 3**).

5.8.5 An Arboricultural Method Statement is recommended to ensure tree removal, retention pruning, and protection are managed correctly.

5.9 Planning Statement Appendix D - Lighting Assessment

5.9.1 Lighting proposals for the Proposed Development are designed in accordance with current good practice and would ensure that any spillage of obtrusive light outside of the Site boundary would be minimised. The lighting assessment demonstrates that the Proposed Development would be compliant with residential receptor criteria, 'sky glow' criteria, and light spill criteria for particularly light sensitive bats undertaking commuting and foraging activities. Mitigation, including but not limited to luminaries with no upward lighting, careful selection, aiming and positioning of luminaries, use of low intensity LED modules, and minimising the task illuminance level.

5.10 Planning Statement Appendix E - Air Quality Assessment

5.10.1 The Air Quality Assessment has considered the potential impacts associated with fugitive dust and vehicle exhaust emissions during the construction and operational phases of the Proposed Development.

5.10.2 No unacceptable impacts on existing or future human health, amenity or ecological receptors have been identified to arise from the Proposed Development.

5.10.3 Beneficial effects with respect to air quality are anticipated due to the HGV traffic no longer travelling past the residential areas down the B5070.

5.11 Planning Statement Appendix F - Transport Assessment

5.11.1 The TA shown at **Planning Statement Appendix F** demonstrates that the proposed priority-controlled roundabout off the B5070 would be compliant with CD116 Design Manual for Roads and Bridges (DMRB) guidance, 'Geometric design of Roundabouts' and has suitable capacity for future development scenarios. The TA also demonstrates that parking provision is suitable and that the Proposed Development Site is well located for other

forms of sustainable transport including pedestrian access, public transport, and cycling.

- 5.11.2 In addition to a Construction Traffic Management Plan (CTMP) which would be implemented to manage local disturbances during the construction period, additional mitigation measures are proposed to enforce the use of the north access road (rather than the existing access) via haulier management, driver monitoring, driver training, and driver notification.

6.0 CUMULATIVE EFFECTS

- 6.1.1 Paragraph 5(e) of Schedule 4 of the EIA Regulations requires that the ES include:

'A description of the likely significant effects of the development on the environment resulting from...

... (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources'.

- 6.1.2 On this basis each topic chapter will provides an assessment of likely significant cumulative environmental effects with other projects in the area.

- 6.1.3 The EIA Regulations do not define cumulative effects. However, a commonly accepted description is:

'Impacts that result from incremental changes caused by other past, present or reasonably foreseeable actions together with the project' (European Commission, 1999)

- 6.1.4 As described in further detail at **ES Chapter 2.0 (EIA Methodology)**, several planning permissions have been recently granted (but not yet completed) for developments which form part of the ongoing investment at the existing Kronospan Facility. In addition, the future (indicative) 132kV underground cable route between the proposed 132kV substation and the existing Legacy/Oswestry 132kV overhead line has also been considered. The list of schemes considered in the cumulative assessment is set out in **Table 6.1** below and also shown at **ES Figure 2.1** and **ES Figure 2.2 (ES Volume 2)**.

Table 6.1: Cumulative Schemes

Application Reference	Project Detail	Status	Included in the Cumulative Assessment
P/2021/0725	Kronospan - North East Warehouse	Under construction	Yes (whilst noting that for some topics this would be part of the non-cumulative baseline)
P/2017/0699	Kronospan – Log Delivery System and Chipping and Flaking System	Yes – chipping system is constructed but the log delivery and flaking system is awaiting construction	Yes (whilst noting that for some topics this would be part of the non-cumulative baseline)
APP/H6955/A/18/3193142	Kronospan – Raw Board Storage	Under construction	Yes
APP/H6955/A/19/3227571	Kronospan – OSB Facility	Under construction	Yes
P/2022/0336	Kronospan – Covered Loading Yard	Awaiting construction	Yes
P/2022/0615	Kronospan – Engineering Stores	Awaiting construction	Yes
P/2022/0765	Kronospan – Silos and Extension to Chip Preparation Building	Awaiting construction	Yes
N/A	Indicative 132kV underground cable route between proposed 132kV	Indicative (assumed) – not yet submitted	Yes

Application Reference	Project Detail	Status	Included in the Cumulative Assessment
	substation and existing Legacy/Oswestry overhead line		

- 6.1.5 On this basis, each ES topic chapter provides an assessment of likely significant cumulative environmental effects with other projects in the area.
- 6.1.6 For all ES topic chapters, the cumulative effects of the Proposed Development would not materially differ from those described in the pre-cumulative assessments. Cumulative effects would not be significant and no additional mitigation measures are proposed to address cumulative effects.

7.0 PLANNING POLICY CONTEXT AND APPRAISAL

7.1 Introduction

7.1.1 This section of the Planning Statement provides an analysis of the Proposed Development in the context of all current, relevant planning policy and guidance.

7.1.2 Following on from this introduction the policy appraisal is divided into three sections. Section 7.2 provides a brief overview of the relevant policy context and identifies the principal documents to which further reference will be made. Section 7.3 provides a detailed assessment of how the proposals accord or otherwise with the relevant policy considerations.

7.2 Policy Context – Overview

The Statutory Development Plan

Overview

7.2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 1.18 of Planning Policy Wales (February 2021) (PPW11) require that applications for planning permission should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

7.2.2 In the case of the Proposed Development the relevant statutory Development Plan comprises the Future Wales; the National Plan 2040 ('Future Wales') and the Wrexham Unitary Development Plan 1996-2011 (UDP).

Future Wales

7.2.3 PPW11 sets out that a plan-led approach is the most effective way to secure sustainable development through the planning system and it is essential that plans are adopted and kept under review. Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.

- 7.2.4 Future Wales provides the national development framework, setting the direction for development in Wales to 2040. It concentrates on development and land use issues of national significance, indicating areas of major opportunities and change, highlighting areas that need protecting and enhancing and helping to co-ordinate the delivery of Welsh Government policies to maximise positive outcomes.
- 7.2.5 Local Development Plans, in this instance the UDP, set out the vision for development within the administrative area of the plan for the plan period. The plan identifies strategic aims, identifies areas where specific development may or may not be appropriate and provides development management policies which should be applied when determining applications for planning permission.
- 7.2.6 When determining a planning application, the planning authority should consider whether it is in accordance with the development plan when considered as a whole, not simply whether it complies with each and every relevant policy.

The UDP

- 7.2.7 The UDP was adopted on the 14 February 2005. However, it must be noted that the UDP is 11 years out of date and does not represent the Council's intended current and future ambitions for place-making within Wrexham County and decision-making on local developments. This is reinforced by PPW11, which states at Paragraph 1.22:

'Up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making. Plans at all levels of the development plan hierarchy must be prepared in accordance with national planning policies. Planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise.'

- 7.2.8 The above is also reinforced by Future Wales, which states in its introduction:

'Strategic and Local Development Plans are required to be in conformity with Future Wales and must be kept up to date to ensure they and Future'

Wales work together effectively. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole. Future Wales replaces the Wales Spatial Plan.'

7.2.9 With respect to material considerations, as referenced at Paragraph 1.22 of PPW11, further details are provided below including an appraisal of the Proposed Development against relevant policies of the LDP. The LDP is at an advanced stage having been through Examination in Public and the subsequent Matters Arising consultation in May 2022. As such the LDP is deemed to carry significant weight.

7.2.10 The key environmental/policy considerations in relation to the Proposed Development are the Site being within allocated 'Green Barrier' land, noise, visual impact (including heritage), biodiversity and flood risk and drainage. The relevant policies of the UDP in relation to these matters, as well as the general principle of the Proposed Development, have been identified as follows:

- UDP Policy PS1: Strategic Policy (The Broad Location of Development)
- UDP Policy PS2: Strategic Policy (The Broad Location of Development)
- UDP Policy PS3: Strategic Policy (The Broad Location of Development)
- UDP Policy PS4: Strategic Policy (The Broad Location of Development)
- UDP Policy GDP1: Development Objectives
- UDP Policy EC1: Green Barriers
- UDP Policy EC2: Agricultural Land
- UDP Policy EC4: Hedgerows, Trees and Woodland
- UDP Policy EC5 Special Landscape Areas
- UDP Policy EC6: Biodiversity Conservation
- UDP Policy EC7: Conservation Areas
- UDP Policy EC9: Listed Buildings of Special Architectural or Historic Interest
- UDP Policy EC11: Archaeology
- UDP Policy EC12: Development and Flood Risk
- UDP Policy EC13: Surface Water Run-off
- UDP Policy EC14: Protection of Controlled Waters
- UDP Policy T6: Primary and Core Highway Network

- UDP Policy T8: Parking
- UDP Policy E4: Employment Development of Unannotated Land within Settlements

Material Planning Considerations

- 7.2.11 In addition to the policies of the statutory Development Plan, the Proposed Development has also been considered in the context of other material planning considerations. These include the following:

The Local Development Plan

- 7.2.12 WCBC has prepared its new LDP for the County Borough. The LDP is the Council's land use plan that will establish where and how much new development will take place in the County Borough over the period 2013 – 2028. It will also identify which areas need to be protected from development. Once adopted, the LDP will replace the UDP and will be used to make decisions on all planning applications.
- 7.2.13 The Plan was submitted to the Welsh Government and the Planning Inspectorate on 30th November 2018, but it was only officially acknowledged as being received on 18th April 2019. Hearings were held into the Plan in September and October 2019. Since then, there has been correspondence between the Council and the Planning Inspectorate, which has been focused on housing and gypsy and traveller accommodation site assessment and selection process.
- 7.2.14 There was correspondence with the Planning Inspectorate in 2021 in relation to Natural Resources Wales's new targets on release of phosphates into rivers in Special Areas of Conservation. The inspectors do not believe some of the housing sites would be viable as a result on these new phosphate targets. WCBC has liaised with Flintshire County Council to prepare a draft catchment phosphorous reduction strategy covering the River Dee, which outlines a number of mitigation measures to enable housing sites to be brought forward. The Welsh Government has endorsed this approach taken by the two local planning authorities.
- 7.2.15 The Examination of the LDP is complete and the Inspectors Report on the LDP was issued by Planning and Environment Decisions Wales (PEDW) to

WCBC in March 2023 stating that, subject to the implementation of the recommended binding changes, the LDP meets the tests of soundness and is recommended for adoption by WCBC. WCBC Full Council decided not to adopt the LDP on 19 April 2023 and again on 14 June 2023. The LDP will now be subject to a Judicial Review of WCBC's decision not to adopt the LDP.

7.2.16 To conclude, the LDP is at an advanced stage having been deemed to meet the tests of soundness in the Inspectors Report. Significant weight should be attributed to the LDP policies in the determination of this planning application.

7.2.17 The relevant LDP policies are as follows:

- Policy SP2: Location of Development
- Policy SP8: Economic Growth Employment and Enterprise
- Policy SP11 Transport and Accessibility
- Policy SP14: Natural Environment
- Policy SP15: Historic and Cultural Environment
- Policy SP16: Minerals Supply and Safeguarding
- Policy SP19: Green Infrastructure
- Policy DM1: Development Management Considerations
- Policy NE1: International and National Nature Conservation Designations
- Policy NE2: Local Designations for Nature Conservation and Geological Importance
- Policy NE3: Trees, Woodlands and Hedgerows
- Policy NE4: AONB
- Policy BE1: Pontcysyllte Aqueduct and Canal World Heritage Site
- Policy EM1: Protection of Existing Employment Land
- Policy EM4: Employment Development Outside of Settlement Limits
- Policy T1: Managing Transport Impacts
- Policy T2: Active Travel
- Policy T6: Strategic Transport Infrastructure Improvements
- Policy MW1: Minerals Safeguarding

Other National, Regional and Local Planning Considerations

- Planning Policy Wales Edition 11 (February 2021)
- Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009)
- TAN 11: Noise (1997)
- TAN 12: Design (2016)
- TAN 15: Development and Flood Risk (2004)
- TAN 18: Transport (2007)
- TAN 23: Economic Development (2014)
- TAN 24: The Historic Environment (2017)
- The following WCBC Local Planning Guidance Notes:
 - Local Planning Guidance Note 7 – Landscape and Development
 - Local Planning Guidance Note 17 – Trees and Development
 - Local Planning Guidance Note 26 – Landscape and Industrial Development
 - Local Planning Guidance Note 29 – Employment Development and Nature Conservation
 - Local Planning Guidance Note 32 – Biodiversity and Development
 - Local Planning Guidance Note 33. – Pontcysyllte Aqueduct & Canal
- Wrexham Tree and Woodland Strategy 2016 - 2026

7.3 Planning Policy Context and Appraisal

- 7.3.1 The following sub-section sets out the policies contained within the statutory Development Plan (the UDP) and other material considerations that are of particular relevance to the Proposed Development. The objective of this assessment is to determine whether the Proposed Development would lead to the achievement, or otherwise, of national and local planning policy and guidance objectives. The appraisal also establishes the degree to which the Proposed Development is supported by, or conflicts with, other material planning considerations.

Future Wales: The National Plan 2040

7.3.2 Future Wales is the national development framework, setting the direction for development in Wales to 2040. It forms the highest tier of the development plan structure in Wales. Strategic Development Plans, which are not yet in place, cover regional and sub-regional scales and Local Development Plans consider issues at the local scale.

7.3.3 The First Minister of Wales recognises in the Foreword to the Plan that the next twenty years will be a critically important period as we face the challenges of global climate change. This message is echoed throughout the document.

7.3.4 Sustainable development and decarbonisation are common themes within many of the policies of Future Wales. It is clear the Welsh Government views the low carbon economy and the decarbonisation of industry as being critical for the future growth of the Country and is supportive of development which helps meet this aim. In relation to climate change Future Wales states:

‘It is vital that we reduce our emissions to protect our own well-being and to demonstrate our global responsibility. Future Wales together with Planning Policy Wales will ensure the planning system focuses on delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use and how we live and travel.’. It goes on to set out that *“To increase our economic prosperity we must focus on delivering the clean growth aim and preparing the Welsh economy for the markets of the future and demand for low carbon goods and services.”*

7.3.5 Future Wales sets out seven key questions which will help to determine the progress that the Plan has helped to deliver. The first of these is *‘Has Future Wales supported decarbonisation?’*.

7.3.6 Future Wales contains several specific policies which are deemed relevant to the Proposed Development.

7.3.7 Policy 1 identifies Wrexham and Deeside as National Growth Areas, this is supported by Policy 20 which focuses specifically on the growth of

Wrexham and Deeside. These areas are identified as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing and transport infrastructure. Policy 21 relates to economic development and identifies the North Wales Coastal Settlements as a Regional Growth Area, supporting sustainable growth and regeneration along the northern coast. Kronospan was the 9th largest manufacturer in Wales in 2020 and provides direct employment for over 600 people, of whom 90% live within 10 miles of the site. The Proposed Development would enable Kronospan to further improve the efficiency of their operations at the Chirk site. This would improve the company's ability to compete effectively with rival wood-based panel manufacturing companies across Europe, contributing to the economic sustainability of this important local employer. The Proposed Development would also ensure that there are no overall job losses with potential for a slight increase.

- 7.3.8 Policy 9 supports the enhancement of biodiversity and states *'In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.'* . As set out in Chapter 9.0 of the ES (document reference T.4.2.9) the PoA Terminal and Foreshore Works Proposed Development will be designed to deliver a net biodiversity benefit.
- 7.3.9 Policy 17 sets out that the Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet Wales' future energy needs. It also states *"In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments"*. Whilst the Proposed Development Proposed is not an energy generating scheme in itself, the proposed 132kV substation would improve the security of electricity supply which would improve the overall efficiency of operations and free up capacity for renewable energy opportunities such as solar
- 7.3.10 In summary it is considered that the Proposed Development meets the strategic aims of Future Wales and complies with, and contributes to, achieving the specific policies within the national development framework.

As such the Proposed Development gains substantial support from this element of the Development Plan.

The Development Plan - Wrexham Unitary Development Plan 1996-2011 (February 2005)

UDP Policy PS1 (The Broad Location of Development) and UDP Policy E4 (Employment Development of Unannotated Land within Settlements)

- 7.3.11 UDP Policy PS1 (The Broad Location of Development) is a strategic policy which aims to ensure that new development for housing, employment and community services will be directed to within defined settlement limits/employment areas.
- 7.3.12 UDP Policy E4 (Employment Development of Unannotated Land within Settlements) states that employment development on unannotated land within settlement limits will be permitted subject to Policy GDP1.
- 7.3.13 The Proposed Development is contrary to UDP Policy PS1 and UDP Policy E4 due to its location immediately outside (and adjacent) the settlement limit/employment area and the existing Kronospan Facility. However, the principle of the Proposed Development is that it would be a benefit to the residents of Chirk by removing Kronospan HGV traffic from Holyhead Road which would have overall amenity benefits for local residents, improving on-site HGV parking provision and overall efficiency of ongoing operations, and improving the security of electricity supply which would improve the overall efficiency of operations and free up capacity for renewable energy opportunities such as solar – see Chapter 3.0 (Need and Benefits of the Proposed Development) of this Planning Statement for further details.
- 7.3.14 The relative density of the existing Kronospan Facility and the presence and nature of the immediate surrounds (including Mondelez immediately south, the railway line, canal, woodland to the immediate west, and Holyhead Road and the residential areas of Chirk to the immediate east), means that the land to the north of the existing Kronospan Facility is the only practicable location for the Proposed Development. It is only by using the land to the north that the intended benefits of diverting HGV movements away from the main settlement would be realised. Further details of alternatives are also provided at **ES Chapter 3.0 (Alternatives)** which

demonstrates that the Proposed Development Site (including the siting of the proposed 132kV substation) is the most appropriate site.

- 7.3.15 Although the Proposed Development Site is outside of the settlement limit/employment area, its location immediately adjacent the settlement limit/employment area (the existing Kronospan Facility) would mean that it would be seen as a logical extension to the settlement limit/employment area and would not have a detrimental impact on the setting of the immediate land uses; this would be affirmed by the Proposed Development Site having the same eastern (Holyhead Road) and western (railway, woodland, and canal) boundaries as the existing Kronospan Facility as these boundaries continue in a northerly direction towards the A5. In particular, the physical boundaries of the railway to the west and Holyhead Road to the east are considered to be 'hard' strategic, more permanent boundaries, rather than soft, easily movable boundaries, which naturally serve to minimise the spread of development in this locality. The above is also considered to be in accordance with UDP Policy PS4 (see below for further details).

UDP Policy PS2 – The Broad Location of Development

- 7.3.16 UDP Policy PS2 (The Broad Location of Development) is a strategic policy which aims to ensure that the countryside, landscape/townscape character, open space, or the quality of the natural environment are not detrimentally affected by development.
- 7.3.17 The Proposed Development Site is not designated as open space, is owned by the Applicant, and is not publicly accessible. Therefore, there would be no adverse impacts on open space.
- 7.3.18 With respect to consideration of the countryside, see below for further discussion regarding Green Barriers (UDP Policy EC1) and agricultural land (UDP Policies PS3 and EC2).
- 7.3.19 See summary of the LVIA and Biodiversity and Nature Conservation ES Chapters at **Section 5.2 and Section 5.4** respectively of this Planning Statement which demonstrate that significant effects would be unlikely to arise in accordance with UDP Policy PS2. The EIA demonstrates that there would be minor beneficial effects for notable and priority habitats, on-site

habitats, birds, and bats once newly created habitats via the Illustrative Landscape Masterplan (**see Planning Drawing 3**) are established.

UDP Policy PS3 – The Broad Location of Development

- 7.3.20 UDP Policy PS3 (The Broad Location of Development) aims to ensure that development is directed at previously developed brownfield sites rather than greenfield land, wherever possible, particularly where greenfield land is of ecological, landscape or amenity value, or comprises agricultural land of grades 1, 2 or 3a quality.
- 7.3.21 It is acknowledged that the Proposed Development Site is on greenfield land and is therefore contrary in principle to Policy PS3. However, Policy PS3 states that brownfield land is preferred 'wherever possible'; this implies that provided it can be demonstrated that it would not be possible to use brownfield land, that greenfield land is, in principle, acceptable. Furthermore, the policy focusses on greenfield land with ecological, landscape or amenity value, or comprises agricultural land of grades 1, 2 or 3a quality.
- 7.3.22 As stated above at paragraphs 7.3.13 and 7.3.14 (UDP Policy PS1 and UDP Policy E4) of this Planning Statement, it is not feasible to locate the Proposed Development elsewhere on previously developed land due to the location and nature of the surrounding land uses, and the benefits of the Proposed Development (see **ES Chapter 3.0 Need and Benefits of the Proposed Development**) would not be able to be realised.
- 7.3.23 See summary of the LVIA and Biodiversity and Nature Conservation ES Chapters at **Section 5.2 and Section 5.4** respectively of this Planning Statement which demonstrate that the Site has relatively low ecological and landscape value and that significant effects would be unlikely to arise in accordance with UDP Policy PS3. The EIA demonstrates that there would be minor beneficial effects for notable and priority habitats, on-site habitats, birds, and bats once newly created habitats via the Illustrative Landscape Masterplan are established.
- 7.3.24 As described above at paragraph 7.3.17 (UDP Policy PS2), the Proposed Development Site is not designated for or used as open space/amenity use,

is owned by the Applicant, and is not publicly accessible. Therefore, there would be no adverse impacts on its amenity value.

- 7.3.25 The Agricultural Land Classification Survey Report (**Planning Statement Appendix A**) shows that the entirety of the Proposed Development Site is Grade 3b agricultural land. Its loss to the Proposed Development is not considered to be detrimental (due to its relatively small footprint and the vast amounts of agricultural land in the surrounding area, including land of greater agricultural quality) and is therefore not contrary to these provisions of UDP Policy PS3 or the provisions of UDP Policy EC2 (see below).

UDP Policy PS4 – The Broad Location of Development

- 7.3.26 UDP Policy PS4 aims to ensure that development maintains the existing settlement pattern and character and is integrated in the existing transport network.
- 7.3.27 As described at paragraph 7.3.15 (UDP Policy PS1 and UDP Policy E4) of this Planning Statement above, the Proposed Development would maintain the existing settlement pattern and character as it would form a logical extension to the existing Kronospan Facility.
- 7.3.28 The Proposed Development would be integrated to, and result in improvements to the local highway network as it would significantly reduce the level of (Kronospan) HGV traffic using Holyhead Road from the A5 to the north. Holyhead Road would be used for a distance of approximately 250m between the A5 and the proposed access point, compared to the current distance of approximately 1.5km between the A5 and the current Kronospan access. The new junction has been designed to meet current highways design standards as set out in the Transport Assessment (**Planning Statement Appendix F**).
- 7.3.29 The Proposed Development Site represents a sustainable location for a commercial development, being within an acceptable walking and cycling catchment of local residential areas, as well as being accessible by both bus and rail services to/from key local settlements nearby. These public transport services reduce the need for employees at the site to utilise the car for commuting journeys. However, the Proposed Development would not generate additional employment directly.

UDP Policy EC1 – Green Barriers

Overview

- 7.3.30 UDP Policy EC1 (Green Barriers) sets out that development within Green Barriers will only be supported for agriculture, forestry, essential facilities for outdoor sport and recreation, cemeteries and other uses of land which maintain the openness of the Green Barrier and do not conflict with the purpose of including land within it.
- 7.3.31 The Proposed Development would be on land outside of the Chirk defined settlement boundary, to the immediate north of the existing Kronospan Facility, within land which is currently designated as 'Green Barrier' land. Green Barriers serve the same function as 'Green Wedges' or 'Green Belt' as described in PPW11.
- 7.3.32 The relevant Purposes of Green Belt in this instance (as defined by paragraph 3.67 of PPW11, and paragraph 5.2 of the UDP) are:
- 1 - prevent the coalescence of urban areas with other settlements;
 - 2 - manage urban form through the controlled expansion of urban areas;
 - 3 - assist in safeguarding the countryside from encroachment;
 - 4 - protect the setting of an urban area; and
 - 5 - assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- 7.3.33 The Proposed Development is not of a type set out in Policy EC1 that is deemed acceptable in principle within Green Barriers.
- 7.3.34 The Proposed Development would constitute 'inappropriate development' and 'exceptional circumstances' (where other considerations clearly outweigh the harm) would need to be demonstrated (paragraph 3.74 of PPW11) to justify the Proposed Development.

Green Belt/Green Barrier Purpose 1 - 4

- 7.3.35 The Proposed Development is not considered to conflict with Green Belt/Green Barrier Purpose 1 and 2 as there are no other settlements in the locality for coalescence to occur; the nearest settlements are the residential

areas approximately 2km to the south, south of the River Ceiriog, and Halton approximately 1.3km to the north east on the eastern side of the A483 Chirk Bypass. As set out in paragraph 7.3.15 the physical boundaries of the railway to the west and Holyhead Road to the east are considered to be 'hard' strategic, more permanent boundaries, rather than soft, easily movable boundaries, which naturally serve to minimise the spread of development in this locality. In addition, the topography of the locality, including the steep sided valley through which the River Dee runs, would act a barrier to wider development pressures leading to coalescence between Chirk and Pentre.

- 7.3.36 Chirk has a broadly north-south orientation with Holyhead Road (the B5070) running through the centre with most of the residential development immediately east of Holyhead Road, and employment (including the existing Kronospan Facility) and recreation land uses immediately west of Holyhead Road. Immediately opposite the Proposed Development Site is the northern extent of the residential area of Chirk (north of 'Crogen' and east of Holyhead Road); as described at paragraph 7.3.15 (UDP Policy PS1 and UDP Policy E4) of this Planning Statement, the 'rounding off' or 'infilling' of the land west of Holyhead Road by virtue of the Proposed Development is considered to maintain the existing settlement pattern and character as it would form a logical extension to the existing Kronospan Facility and would not undermine Green Belt/Green Barrier Purpose 1, 2, 3 and 4.

Green Belt/Green Barrier Purpose 5

- 7.3.37 As stated above at paragraphs 7.3.13 and 7.3.14 (UDP Policy PS1 and UDP Policy E4) of this Planning Statement, it is not feasible to locate the Proposed Development elsewhere on previously developed land due to the location and nature of the surrounding land uses, and the benefits of the Proposed Development (see Chapter 3.0 Need and Benefits of the Proposed Development) would not be able to be realised.
- 7.3.38 Kronospan is a key employer to the local community; the proposed expansion into the Green Barrier is required to achieve the aim of removing HGV traffic from Chirk, future-proof the existing Facility by improving the efficiency of current operations, providing environmental benefits and helping to ensure the site's long-term economic viability.

Openness

- 7.3.39 The Proposed Development would have an impact on openness by virtue of the physical presence of development within the Green Barrier and its visibility.
- 7.3.40 The Proposed Development has been designed to minimise its visibility from nearby receptors, with the majority of the scheme comprising ground level development (i.e. car parking, roads and drainage scheme) which would have very little impact on the openness of the Green Barrier. The Landscape and Visual Impact Assessment (see **ES Chapter 5.0**) is supported by a series of figures that demonstrate how the visibility of the Proposed Development would be relatively limited within views from receptors in close proximity of the site as well as from more distant receptors. As such whilst it is acknowledged that the Proposed Development would impact openness, this is considered to be relatively limited.

Summary of Consideration of Green Belt/Green Barrier Purposes and Other Considerations

- 7.3.41 The above appraisal demonstrates that the Proposed Development in this location would not conflict with the purpose of including land within the Green Barrier, as per UDP Policy EC1. It would nonetheless impact openness to a limited degree.
- 7.3.42 Extensive landscaping throughout the Proposed Development Site (see Illustrative Landscape Masterplan at **Planning Drawing 3**) and new drainage wetland (see **Planning Statement Appendix B**) are proposed as mitigation. These are compatible land uses to the Green Barrier.
- 7.3.43 The nature of the Proposed Development Site, its immediate surroundings and boundaries (as described at paragraphs 7.3.14 and 7.3.15 (UDP Policy PS1 and UDP Policy E4) of this Planning Statement) means that this Site does not perform a key role in the purpose of the wider Green Barrier at Chirk and that the Green Barrier (as a whole) would retain its capability to perform its core functions (as set out in UDP Policy EC1 and PPW11).

- 7.3.44 As part of the LDP evidence base, WCBC has undertaken an exercise (Green Wedge Review document) whereby the Green Barriers have been reviewed, and in this location, the Green Barrier has been deemed to be not required to support the overarching purpose of the Green Barrier as a whole and is proposed to be removed. In this regard the above analysis of UDP Policy EC1 is consistent with the policies of the LDP where the Proposed Development Site is no longer proposed as a Green Barrier. The land would nonetheless be Open Countryside (defined as land outside of settlement limits).
- 7.3.45 In this context the key locational policy is LDP Policy EM4 (Employment Development Outside of Settlement Limits) which seeks to only support such development where it is, amongst other considerations, the extension of an existing employment site.
- 7.3.46 This LDP policy approach is more supportive of employment development (extension of an existing employment site) in the Open Countryside than the currently adopted UDP policy on Green Barriers. Further consideration of the LDP policies (including a summary of the Green Wedge Review document) is provided below under the heading 'Material Planning Considerations'.
- 7.3.47 It should be noted that Policy EC1 is not consistent with PPW in relation to Green Belt/Barrier/Wedge policy in that it does not introduce the concept of very exceptional circumstances outweighing harm to the designation. Paragraph 3.74 of PPW sets out:
- 'Inappropriate development should not be granted planning permission except in very exceptional circumstances where other considerations clearly outweigh the harm which such development would do to the Green Belt or green wedge.'*
- 7.3.48 It has been demonstrated above there would be very limited harm in relation to Purposes of the Green Barrier in this location, the conclusions of which are reinforced by the position of the LDP. It has also been shown that there is limited harm to openness. As such this needs to be taken into account in the balancing exercise of harm to the purpose of the Green Barrier vs benefits which may accrue from other considerations.

- 7.3.49 A detailed review of the need and benefits of the proposal has been set out in Chapter 3.0 of this Planning Statement which demonstrate that there are compelling reasons for undertaking the development in the location proposed. Chapter 3.0 also describes the benefits arising from the Proposed Development are substantial, at a local, regional and national level.
- 7.3.50 Furthermore, the proposed removal of the Green Barrier in this location within the LDP (which is at a very advanced stage in its adoption process) represents another material planning consideration.
- 7.3.51 Taken together, these 'other considerations' are deemed to clearly outweigh the limited harm the development would do to the Green Barrier. As such it is considered very exceptional circumstances exist which would overcome the harm to the Green Barrier in this instance.

UDP Policy GDP1: Development Objectives

- 7.3.52 UDP Policy GDP1 sets out eleven objectives for all new development. The following objectives are considered to be particularly relevant to the Proposed Development:
- a) Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.
 - b) Take account of personal and community safety and security in the design and layout of development and public / private spaces.
 - d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.
 - e) Ensure that built development is located where it has convenient access to public transport facilities and is well related to pedestrian and cycle routes where possible.
 - f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.

- h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.
- i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site.
- k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.

7.3.53 With respect to a), the **Design and Access Statement** describes the design and access principles of the Proposed Development; and ES Chapter 5.0 (LVIA) describes the landscape considerations, potential for effects and proposed mitigation including the Illustrative Landscape Masterplan at **Planning Drawing 3**.

7.3.54 With respect to a), b), and d), further information regarding the alternatives considered to maximise the effective use of space and minimise environmental impacts is described at **ES Chapter 3.0 (Alternatives)**.

7.3.55 With respect to d) and e), further information is provided in the Transport Assessment at **Planning Statement Appendix F**.

7.3.56 With respect to f), further information is provided at **Planning Statement Appendix D** (Lighting Assessment), **Planning Statement Appendix E** (Air Quality Assessment), and **ES Chapter 8.0 (Noise and Vibration)**.

7.3.57 With respect to f) and i), further information is provided at **Planning Statement Appendix B** (Flood Consequence Assessment and Surface Water Drainage Strategy).

7.3.58 With respect to h), further information is provided at **ES Chapter 7.0 (Biodiversity and Nature Conservation)**.

7.3.59 In addition to the site-specific landscape mitigation described above, there is a long-term strategy for landscaping which Kronospan takes seriously. Their continued stewardship over the Site and their wider landholdings would ensure that future landscaping and planting are managed appropriately.

7.3.60 With respect to k), Kronospan was the 9th largest manufacturer in Wales in 2020⁴ and provides direct employment for over 600 people, of whom 90% live within 10 miles of the site. The Proposed Development would enable Kronospan to further improve the efficiency of their operations at the Chirk site. This would improve the company's ability to compete effectively with rival wood-based panel manufacturing companies across Europe, contributing to the economic sustainability of this important local employer. The Proposed Development would also ensure that there are no overall job losses with potential for a slight increase.

7.3.61 The assessments referenced above demonstrate that where there is the potential for notable adverse effects, they can be appropriately managed and/or mitigated. In light of the above the Proposed Development is considered to accord with Policy GDP1.

UDP Policy EC2: Agricultural Land

7.3.62 UDP Policy EC2 states that development on agricultural land of grades 1, 2 or 3a will only be permitted if it does not lead to the irreversible loss of that land.

7.3.63 The Agricultural Land Classification Survey Report (**Planning Statement Appendix A**) shows that the entirety of the Proposed Development Site is Grade 3b agricultural land. It is therefore not contrary to UDP Policy EC2.

UDP Policy EC4: Hedgerows, Trees and Woodland

7.3.64 The policy requires that development proposals should provide for the conservation and management of (inter alia) hedgerows, trees, and woodland. New planting should be included to enhance the character of the landscape and townscape, whilst developments which result in the loss or significant damage to valuable trees, important hedgerows or woodland will not be permitted.

7.3.65 As part of the Arboricultural Impact Assessment (see **Planning Statement Appendix C**), a tree survey in accordance with BS5837:2012 (Trees in Relation to Design, Demolition and Construction – Recommendations) was

⁴ Research compiled by the University of South Wales Business School: <https://www.business-live.co.uk/economic-development/biggest-firms-wales-19439338>, Accessed 22 February 2022

undertaken. The survey recorded a total of 159 tree records which may be influenced by the Proposed Development.

- 7.3.66 Trees recorded include 121 trees, 21 tree groups and 18 hedges. One tree was recorded as Category A (T116), 36 trees were recorded as Category B, 121 trees as Category C and one tree as Category U.
- 7.3.67 A total of 88 trees, six complete tree groups, two part tree groups, six complete hedges and six part hedgerows would need to be removed to facilitate the Proposed Development. Five trees would require need pruning and/or tree protection barriers.
- 7.3.68 An extensive replanting programme has been developed to compensate for expected tree loss (see Illustrative Landscape Masterplan at **Planning Drawing 3**).
- 7.3.69 An Arboricultural Method Statement is recommended to ensure tree removal, retention pruning, and protection are managed correctly.

UDP Policy EC5: Special Landscape Areas

- 7.3.70 UDP Policy EC5 states that within Special Landscape Areas, priority will be given to the conservation and enhancement of the landscape. Development, other than for agriculture, small-scale farm-based and other rural enterprises, and essential operational development by utility service providers, will be strictly controlled. Development will be required to conform to a high standard of design and landscaping, and special attention will be paid to minimising its visual impact both from nearby and distant viewpoints.
- 7.3.71 It is worth noting that the Proposed Development Site is no longer proposed to be designated as a Special Landscape Area in the LDP. The boundary revision process is underpinned by a supporting document, namely the *Special Landscape Areas Study*⁵, and has been undertaken to comply with the requirements of *Planning Policy Wales* to:

⁵ TACP, 2017. Special Landscape Areas Study. Wrexham County Borough Council

‘...identify which features, characteristics or qualities require extra protection, and explain how the policy of designation will achieve this protection...’⁶

- 7.3.72 As such, it can be concluded that the landscape of the Site does not have any such features, characteristics or qualities that require extra protection, and that this is demonstrated by the findings of the *Special Landscape Areas Study*.

UDP Policy EC6: Biodiversity Conservation

- 7.3.73 This policy confirms that development within or in close proximity to a site of biodiversity interest will be required to demonstrate that the need for the development outweighs the need to safeguard the intrinsic nature conservation value of the site. This policy is only relevant where a development would harm a site of biodiversity interest.
- 7.3.74 See summary of the Biodiversity and Nature Conservation ES Chapter at **Section 5.4** of this Planning Statement which demonstrates that the Site has relatively low ecological value and that significant effects would be unlikely to arise in accordance with UDP Policy EC6. The EIA demonstrates that there would be minor beneficial effects for notable and priority habitats, on-site habitats, birds, and bats once newly created habitats via the Illustrative Landscape Masterplan are established.

UDP Policy EC7: Conservation Areas

- 7.3.75 This policy seeks to ensure that conservation areas are preserved or enhanced and requires new development within or in close proximity to be compatible with the special qualities of the conservation area.
- 7.3.76 **Appendix 6.1 of ES Chapter 6.0 (Historic Environment)** confirms that there would be no direct or indirect effects on Chirk Conservation Area resulting from the Proposed Development.

⁶ Welsh Government, 2021. Planning Policy Wales, edition 11. Paragraph 6.3.12

UDP Policy EC9 (Listed Buildings) and UDP Policy 11 (Archaeology)

- 7.3.77 UDP Policy EC9 states that development within the curtilage of buildings or structures listed as of special architectural or historic interest must respect their setting and character.
- 7.3.78 UDP Policy EC11 states that development which would adversely affect the site or setting of a Scheduled Ancient Monument or archaeological site of national significance will not be permitted. Development that directly affects non-scheduled sites of archaeological importance will only be permitted if an archaeological investigation has been carried out to determine the nature, extent and significance of the remains, and this investigation indicates that in-situ preservation is not justified, and a programme of excavation and recording has been agreed. Development will also be carefully controlled to ensure that the setting of non-scheduled sites of archaeological importance is not harmed where appropriate.
- 7.3.79 See summary of the Historic Environment ES Chapter at **Section 5.3** of this Planning Statement which demonstrates no significant effects on designated and non-designated heritage assets, with the greatest effect being minor adverse in relation to Afon Bradley farm complex, Pontcysyllte Canal and Aqueduct WHS/SM, Chirk Castle Grade I listed building and Chirk Castle Grade I RPG.

UDP Policies EC12, EC13 and EC14: Development and Flood Risk, Surface Water Run-Off, and Protection of Controlled Waters

- 7.3.80 UDP Policy EC12 states that development within defined flood plains will only be permitted if it would not result in an unacceptable risk of flooding off-site or on-site and would not adversely affect flood management or maintenance schemes.
- 7.3.81 UDP Policy EC13 states that development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted.
- 7.3.82 UDP Policy EC14 states that development which would have an unacceptable adverse impact upon the capacity, flow, quality or availability of controlled waters and associated land will not be permitted.

7.3.83 Flooding from tidal and seas, surface water/pluvial flooding, groundwater, sewer and water mains, reservoirs, canals and artificial sources, and infrastructure failure have all been screened and are considered not to represent a significant flood risk. The Proposed Development includes an increase in impermeable coverage of 5.1ha, which if unmitigated could result in increases in the peak runoff rates from the Proposed Development Site. Therefore, the following SuDS Sustainable Drainage Systems (SuDS) features are proposed:

- Permeable paving underlain by geo-cellular crates.
- Two attenuation basins.

7.3.84 The water would be discharged from the attenuation basins at a controlled rate into the Afon Bradley in the north-west of the Site.

7.3.85 Full details of the proposed SuDS together with details of all modelling and assumptions made are described in the Flood Consequence Assessment and Surface Water Drainage Strategy (**Planning Statement Appendix B**).

UDP Policies T6 and T8: Primary and Core Highway Network, and Parking

7.3.86 UDP Policy T6 states that the design of road improvement schemes; the implementation of traffic management proposals; and the control of development adjacent to the primary and core highway network will have regard to the need to ensure the free and safe flow of traffic. Routes forming the primary and core network will take precedence over other routes and there will be limitations on access, parking, crossing and turning movements.

7.3.87 UDP Policy T8 states Development granted planning permission will be required to provide vehicle parking spaces either on site or nearby, in accordance with the Council's current parking standards. Special regard will be paid to the availability of public transport nearby, proximity to public car parking, proximity to local services and facilities, and road safety hazards and amenity considerations arising from on-street parking in the vicinity of the site.

- 7.3.88 The TA shown at **Planning Statement Appendix F** demonstrates that the proposed priority-controlled roundabout off the B5070 would be compliant with CD116 DMRB guidance, '*Geometric design of Roundabouts*' and has suitable capacity for future development scenarios. The TA also demonstrates that parking provision is suitable and that the Proposed Development Site is well located for other forms of sustainable transport including pedestrian access, public transport, and cycling.

Material Planning Considerations

Wrexham Local Development Plan (2013 - 2028)

Wrexham Strategic Green Wedge Review (October 2017)

- 7.3.89 As mentioned above at paragraph 7.3.44, as part of the LDP evidence base, WCBC has undertaken an exercise whereby the Green Barriers have been reviewed; this is set out in the LDP supporting document entitled 'Wrexham Strategic Green Wedge Review – October 2017'.
- 7.3.90 The Green Barrier relevant to the Proposed Development is 'Area 15: Land between Chirk, Pentre, and Froncysyllte'. This is described as '*an area enclosed by hills to the west and ridge to the east but with generally open views. Chirk and valley are in places influenced by industrial land uses. Countryside with large regular fields in mainly pastoral use with hedgerows and sparse hedgerow trees.*'
- 7.3.91 Area 15 contains three candidate sites including the site opposite the Proposed Development Site which is a proposed residential allocation. All three sites sit on the northern boundary of Chirk; however the Green Wedge Review document states that '*the sites are within well-defined boundaries and would appear to represent a logical rounding off of the settlement. The development of the sites would not result in a significant reduction in the gap between Chirk and Pentre.*'
- 7.3.92 Area 15 was reviewed in consideration of the five relevant purposes of the Green Belt (see paragraph 7.3.32 of this Planning Statement).
- 7.3.93 With respect to coalescence and managing urban form, the Green Wedge Review document states:

7.3.94 *'The existing gap combined with the lack of development pressure, indicates that there is not currently potential for coalescence to occur.... The topography of the area, which comprises the steep sided valley through which the River Dee runs, would act a barrier to the coalescence of the two settlements in this location.....the gaps between settlements mean that this type of erosion (of the area of settlement boundary bordering the area of green wedge) on the urban-rural edge would not lead to coalescence.'*

7.3.95 The Green Wedge Review document concludes:

'The area enclosed by hills to the west and ridge to the east but with generally open views. Chirk and valley are in places influenced by industrial land uses. The wider countryside is characterised by large regular fields in mainly pastoral use with hedgerows and sparse hedgerow trees.

The designation in this area does not sit in-between settlements in close proximity to each other. The topography of the area does allow wide views from certain vantage points. However, these larger expanses of land are not likely to come under the same development pressure, and do not sit in narrow gaps between settlements.

It is therefore recommended that these areas be removed from the designation. Development in these locations would be controlled by the presence of an existing settlement boundary along with local policies presuming against inappropriate development in the open countryside. The area no longer designated as green wedge would still be afforded a high level of protection from development considered inappropriate in the open countryside. Notwithstanding the above, the area around Froncysyllte has a role in relation to the setting of the World Heritage Site and should be retained and extended in order to assist in this function.'

7.3.96 The conclusions of the Green Wedge Review document are consistent with the above appraisal of the Proposed Development against UDP Policy EC1 (Green Barriers). Therefore, in consideration of this, and the removal of the Proposed Development Site from the Green Barrier in the LDP, the Proposed Development is considered, on balance, to be appropriate development in this location - subject to the provisions of policies designed to protect development in the countryside (in this case, Policy EM4

(Employment Development Outside of Settlement Limits – see below for further details).

Economy and Employment

7.3.97 Strategic Objective SO2 seeks to:

‘Support a vibrant, diverse and competitive local economy that provides a range of job opportunities and enable new and existing businesses to grow in Wrexham County Borough with strategic growth in Wrexham City and Wrexham Industrial Estate and take advantage of its strategically accessible location within the wider North East Wales and North West England market region.’

7.3.98 The Proposed Development would help WCBC achieve Strategic Objective SO2 by enabling the ongoing presence of one of the largest employers in the County to further improve the efficiency of their operations at the Chirk site.

7.3.99 Strategic Objective SO2 is supported by several policies including Strategic Policy SP2 (Location of Development), Strategic Policy SP8 (Economic Growth Employment and Enterprise), Policy EM1 (Protection of Existing Employment Land), and Policy EM4 (Employment Development Outside of Settlement Limits)

7.3.100 LDP Policy SP2 requires that new development is directed to the defined settlement limits and employment areas as identified on the Proposals Map.

7.3.101 The LDP Proposals Map shows the extent of the Chirk Industrial Estate employment area immediately adjoining the settlement boundary for Chirk. This contrasts with the UDP which does not define a specific area for employment and instead shows a larger settlement boundary which includes the employment area alongside the rest of Chirk, without differentiation. Therefore, LDP Policy SP2 and UDP Policy PS1 are similar in their approach to directing development to the defined area of Chirk (only differing in that LDP Policy SP2 identifies settlement limits as distinct from employment areas).

7.3.102 The principle of LDP Policy SP2 is the same as the principle of UDP Policy PS1 (and UDP Policy E4), which has been appraised above. In summary

although the Proposed Development Site is outside the settlement limit/employment area, it is the only practicable location for the development, its location immediately adjacent the settlement limit/employment area (the existing Kronospan Facility) would mean that it would be seen as a logical extension to the settlement limit/employment area, would bring benefits to the residents of Chirk (see Chapter 3.0 Need and Benefits of the Proposed Development), and would not have a detrimental impact on the setting of the immediate land uses. This is considered further against LDP Policy EM4 below.

- 7.3.103 LDP Policy SP8 seeks to ensure the continued role of the County Borough as a key economic driver in North Wales and the wider region, it sets out that the Plan will diversify the local economy and widen the economic base. To achieve this, it safeguards existing important industrial sites which are *‘essential to meeting the future economic growth of the County Borough, which ensures a range and choice of sites co-located with housing in both urban and rural settlements.’* This policy seeks to facilitate a level of growth which allows opportunities to deliver approximately 4,200 jobs in the County Borough over the Plan period.
- 7.3.104 The Kronospan Site is one of these industrial sites. The Proposed Development would help maintain the sustainability of the existing business, and the associated significant employment benefits that it provides to the County. It would do this in several ways which are explored within Chapter 3.0 (Need and Benefits of the Proposed Development), whilst helping to reduce the amount of HGV traffic which currently enters the settlement area of Chirk Town.
- 7.3.105 Although LDP Policy EM1 is about protecting existing uses, LDP Policy SP8 identifies the safeguarded sites as being (with added emphasis) *‘essential to meeting the future economic growth’*; therefore the proposed approach within the LDP is deemed to be more than simply maintaining the status quo - it seeks additional development/growth in addition to protecting what is already there.
- 7.3.106 The Proposed Development is part of a programme of continual improvement of the operational efficiency of the Kronospan Facility which will allow Kronospan to compete effectively and maintain its current levels of

employment. Therefore, LDP Policy SP8 and EM1 add weight to the overall 'economy and employment' policy support for the Proposed Development.

7.3.107 The above is further enhanced by LDP Policy EM4 (Employment Development Outside of Settlement Limits). Part iii of Policy EM4 states that new employment development outside of settlement limits will only be permitted if it involves the extension of an existing employment site which is within a settlement limit or employment area and proposes to expand onto land outside the settlement limit/employment area, provided a) there are no suitable sites located within a settlement limit/employment area for the extension to be located and b) the new development would form a logical extension to the settlement limit/employment area.

7.3.108 Part iii of LDP Policy EM4 is a logical extension of the principle of supporting future economic growth as set out in LDP Policy SP8, in the sense that it is acknowledged that, on some occasions, such growth is not always able to take place on existing employment sites (for reasons of available space on site, neighbouring physical or natural land uses/constraints, and/or other reasons), and that extension into adjacent land can be appropriate in principle.

7.3.109 As stated above at paragraphs 7.3.13 and 7.3.14 (UDP Policy PS1 and UDP Policy E4) of this Planning Statement, it is not feasible to locate the Proposed Development elsewhere on previously developed land due to the location and nature of the surrounding land uses, and the benefits of the Proposed Development (see Chapter 3.0 Need and Benefits of the Proposed Development of this Planning Statement for further details) would not be able to be realised. As described at paragraph 7.3.15 (UDP Policy PS1 and UDP Policy E4) of this Planning Statement, the Proposed Development would maintain the existing settlement pattern and character as it would form a logical extension to the existing Kronospan Facility. Further details of alternatives are also provided at **ES Chapter 3.0 (Alternatives)** which demonstrates that the Proposed Development Site (including the siting of the proposed 132kV substation) is the most appropriate site. Therefore, the proposed Development is considered to be in accordance with LDP Policy EM4.

Natural Environment

- 7.3.110 Strategic Objective SO9 seeks to *‘Protect, manage and enhance the natural and historic environment and landscapes.’*
- 7.3.111 LDP Policy SP14 (Natural Environment) requires development to *‘protect, conserve and enhance the natural environment’* and LDP Policy SP19 (Green Infrastructure) requires development to maintain the extent, quality and connectivity of green infrastructure on or near a site and, where appropriate, enhance it.
- 7.3.112 LDP Policy NE1 (International and National Nature Conservation Designations) states that permission for development likely to impact the special features of a nationally designated site will only be granted in exceptional circumstances where appropriate compensation can be provided. LDP Policy NE2 (Local Designations for Nature Conservation and Geological Importance) provides a similar policy approach to LDP Policy NE1.
- 7.3.113 LDP Policy NE3 (Trees, Woodlands and Hedgerows) states that development will only be permitted where it does not cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value or that provide important ecosystem services including mitigating the effects of climate change. There is further advice on developments affecting existing and proposed woodlands: proposals should assist in the appropriate use and protection of woodlands and boundary edges, promote sustainable management; and support the Wrexham Tree and Woodland Strategy 2016-2026.
- 7.3.114 The policy also notes that avoiding adverse or detrimental impact on trees, woodlands and hedgerows should be the primary objective of any proposal, but that where adverse effects cannot be avoided that mitigation is required.
- 7.3.115 LDP Policy NE4 (AONB) states that development outside but closely interlinked with the AONB must not have an adverse impact on its natural beauty.
- 7.3.116 The supporting text to LDP Policy SP14 states *‘It is recognised that the Plan needs to strike the balance between having regard to the relative*

significance of international, national and local designations in considering the weight to be attached to nature conservation interests but must take care to avoid placing unnecessary constraints on development.' Whilst the site is not designated for nature consideration this same principle is considered to apply. The Proposed Development responds both to the employment aims of the LDP whilst also respecting and responding to the natural environment.

- 7.3.117 See summary of the LVIA and Biodiversity and Nature Conservation ES Chapters at **Section 5.2 and Section 5.4** respectively of this Planning Statement which demonstrate that the Site has relatively low ecological and landscape value and that significant effects would be unlikely to arise in accordance with the above policies. The EIA demonstrates that there would be minor beneficial effects for notable and priority habitats, on-site habitats, birds, and bats once newly created habitats via the Illustrative Landscape Masterplan are established.
- 7.3.118 Section 5.6 of the Landscape and Visual Impact Assessment (see **ES Chapter 5.0**) provides an appraisal against the special qualities of the AONB; none of the special qualities of the AONB would be affected by the presence of the Proposed Development. In particular, the tranquillity of the AONB would not be materially affected by any change in landscape character or visual change (including at night-time from proposed lighting), or changes in noise levels.
- 7.3.119 Many trees would need to be removed to facilitate the Proposed Development (see **Planning Statement Appendix C – Arboricultural Impact Assessment**). Embedded mitigation includes the Illustrative Landscape Masterplan which shows the planned extent of new native woodland planting, new native hedgerow planting, new specimen tree planting, new species-rich grassland and new wetland vegetation.

Historic and Cultural Environment

- 7.3.120 LDP Policy SP15 (Historic and Cultural Environment) confirms that development will only be supported where it conserves, protects, preserves or enhances cultural and heritage assets of the County Borough and their settings.

- 7.3.121 LDP Policy BE1 (Pontcysyllte Aqueduct and Canal World Heritage Site) states that development will only be permitted where it would not harm the attributes which justified the inscription of the Pontcysyllte Aqueduct and Canal as a World Heritage Site and the site's Outstanding Universal Value.
- 7.3.122 See summary of the Historic Environment ES Chapter at **Section 5.3** of this Planning Statement which demonstrates no significant effects on designated and non-designated heritage assets, with the greatest effect being minor adverse in relation to Afon Bradley farm complex, Pontcysyllte Canal and Aqueduct WHS/SM, Chirk Castle Grade I listed building and Chirk Castle Grade I RPG.

Transport Infrastructure

- 7.3.123 LDP Policy SP11 (Transport and Accessibility) states that Wrexham's transport network will be developed in a safe, efficient and sustainable manner through the following measures:
- Restricting development that would have an unacceptable impact on the safe and efficient operation of the transport network.
 - Implement key transport projects identified in the Joint North Wales Local Transport Plan and supporting the development and delivery of key strategic road and rail transport improvement projects promoted by the North Wales region and Welsh Government (Policy T4 and T6).
 - Enhance the overall reliance of the network and take steps to adapt the transport network to the effects of climate change.
 - Improve the coverage, service frequency, integration and priority of public transport services to provide a sustainable and viable alternative travel choice to the private car.
 - Improved integration of modes through the development of existing and new transport interchanges ensuring infrastructure provisions is accessible to all.
 - Ensure adequate levels of car parking taking into consideration the location and accessibility of new developments to existing public transport facilities and walking and cycling network.
 - Develop the coverage of the Active Travel Network across Wrexham to promote increased use of walking and cycling as safe, viable and sustainable alternatives to the car.

- Deliver capacity and safety enhancements to the local highway network where considered appropriate to facilitate existing and forecast traffic demands.

7.3.124 LDP Policy T1 (Managing Transport Impacts) states that development proposals will be supported where they:

- Facilitate increased journeys by more sustainable modes of travel first by walking and cycling, then by public transport and finally by private motor vehicle.
- Mitigate any significant adverse effects upon the transport network that arise from the proposed development including improvements to transport infrastructure where required.
- Do not compromise the safe, effective and efficient use of the highway network and do not have an adverse impact on highway safety or create unacceptable levels of traffic generation.
- Provide appropriate levels of parking and ensure access arrangements for the site to allow for safe manoeuvring.
- Make provision for people with restricted mobility including those with characteristics as defined by the Equality Act 2010.

7.3.125 LDP Policy T2 (Active Travel) states that new development will be supported where, amongst others, walking and cycling infrastructure is an integral part of the overall design of the scheme.

7.3.126 LDP Policy T6 (Strategic Transport Infrastructure Improvements) provides details of site-specific schemes where improvements to the strategic road network will be supported.

7.3.127 The TA shown at **Planning Statement Appendix F** demonstrates that the proposed priority-controlled roundabout off the B5070 would be compliant with CD116 DMRB guidance, 'Geometric design of Roundabouts' and has suitable capacity for future development scenarios. The TA also demonstrates that parking provision is suitable and that the Proposed Development Site is well located for other forms of sustainable transport including pedestrian access, public transport, and cycling.

- 7.3.128 In addition to a CTMP which would be implemented to manage local disturbances during the construction period, additional mitigation measures are proposed to enforce the use of the north access road (rather than the existing access) via haulier management, driver monitoring, driver training, and driver notification.

Minerals Safeguarding

- 7.3.129 LDP Policy MW1 (Minerals Safeguarding) states that non-mineral development within Mineral Safeguarding Areas will only be permitted where the mineral does not merit extraction, or the need case outweighs the need to protect the resource, or the mineral can be extracted prior to the development, or the development is temporary in nature, or essential infrastructure that supports the supply of minerals would not be compromised or would be provided elsewhere.
- 7.3.130 LDP Policy SP16 (Minerals Supply and Safeguarding) states that minerals will be sustainably managed through directing new development elsewhere, use of buffer zones to avoid conflict between mineral working and sensitive development, contributing towards meeting the regional need for aggregate minerals, and supporting mineral extraction schemes in sustainable locations where high-quality restoration and aftercare programmes are provided.
- 7.3.131 It is considered that the need and benefits of the Proposed Development (see **Chapter 3.0** of this document) together with the application of LDP Policy EM4 (which for the existing Kronospan Facility can only realistically (and currently) be implemented on this site) would outweigh the need to protect the resource in this location. In addition, the Proposed Development Site is a very small proportion of the much wider extent of the land designated for minerals safeguarding and its development (for this application) is not considered to be detrimental to the overall objective of minerals safeguarding.

Development Management

- 7.3.132 LDP Policy DM1 (Development Management Considerations) sets out ten general criteria that development must fulfil. The following criteria are considered to be particularly relevant to the Proposed Development:

- a) Accord with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/townscape in terms of their siting, layout, scale, height, design, density, use of materials and landscaping.
- b) Not have an unacceptable effect on the amenity of the occupiers of nearby properties/land; and provide a satisfactory standard of amenity for the occupiers/users of the development itself.
- c) Safeguard the environment from the adverse effects of pollution of water, land, noise, light or air, or land instability arising from development.
- d) Take account of personal and community safety and security in their design and layout.
- e) Prioritise walking, cycling and public transport use ahead of travel by car.
- f) Not give rise to highway safety, pedestrian safety or parking problems on site or in the locality.
- g) Contribute to low carbon communities through energy efficiency, be designed to minimise the use of non-renewable energy, water and the production of waste both during construction and when in use.
- h) Not increase the risk of flooding but makes adequate provision for sustainably dealing with foul and surface water drainage and not result in an unacceptable impact upon the water environment.

7.3.133 With respect to a), the **Design and Access Statement** describes the design and access principles of the Proposed Development; and **ES Chapter 5.0 (LVIA)** describes the landscape considerations, potential for effects and proposed mitigation including the Illustrative Landscape Masterplan at **Planning Drawing 3**.

7.3.134 With respect to b), further information is provided at **ES Chapter 5.0 (LVIA)**, and **ES Chapter 8.0 (Noise and Vibration)**.

7.3.135 With respect to c), further information is provided at **Planning Statement Appendix D** (Lighting Assessment), **Planning Statement Appendix E** (Air Quality Assessment), and **ES Chapter 8.0 (Noise and Vibration)**.

- 7.3.136 With respect to c) and h), further information is provided at **Planning Statement Appendix B** (Flood Consequence Assessment and Surface Water Drainage Strategy).
- 7.3.137 With respect to d), further information regarding the alternatives considered to maximise the effective use of space and minimise environmental impacts is described at **ES Chapter 3.0 (Alternatives)**.
- 7.3.138 With respect to e) and f), further information is provided in the Transport Assessment at **Planning Statement Appendix F**.
- 7.3.139 With respect to g), the proposed 132kV substation would improve the security of electricity supply which would improve the overall efficiency of operations and free up capacity for renewable energy opportunities such as solar.
- 7.3.140 In addition to the site-specific landscape mitigation described above, there is a long-term strategy for landscaping which Kronospan takes seriously. Their continued stewardship over the Site and their wider landholdings would ensure that future landscaping and planting are managed appropriately.
- 7.3.141 The assessments referenced above demonstrate that where there is the potential for notable adverse effects, they can be appropriately managed and /or mitigated. In light of the above the Proposed Development is considered to accord with LDP Policy DM1.

Planning Policy Wales (Edition 11, February 2021)

Overview

- 7.3.142 As stated at paragraph 7.2.7 of this Planning Statement, PPW11 states that *'planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise.'* In addition, as stated at paragraph 7.2.8 of this Planning Statement, Future Wales states *'Strategic and Local Development Plans are required to be in conformity with Future Wales and must be kept up to date to ensure they and Future Wales work together effectively. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole. Future Wales replaces the Wales Spatial*

Plan.’ Appropriate consideration of material planning considerations has been provided above, including an appraisal of the Proposed Development against relevant policies of the LDP.

7.3.143 PPW11, which is supplemented by Technical Advice Notes (TANs) and circulars, is the national planning policy for Wales and sets out the land use policies of the Welsh Government. The policies of relevance to the Proposed Development have been considered in the subsequent section. PPW11 and the TANs are material to decisions on individual planning applications and, as such, it is important to consider how the Proposed Development fits within this policy context.

7.3.144 PPW11 defines ‘Sustainable Development’ as meaning “the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”.

7.3.145 The following chapters of PPW11 are considered relevant to the Proposed Development:

- Chapter 3 – Strategic and Spatial Choices
- Chapter 5 – Productive and Enterprising Places
- Chapter 6 – Distinctive and Natural Places

7.3.146 Paragraph 1.18 states that the planning system provides for a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.

7.3.147 The relevant advice within these chapters of PPW11 is outlined below and considered in the context of the Proposed Development.

7.3.148 Chapter 3 relates to ‘Strategic and Spatial Choices’. This includes considering the design of a development and its impacts upon everyday lives. Design is considered to be more than appearance but includes the relationship between all elements of the natural and built environment, and between people and places. Objectives of good design shown in Figure 8 of PPW11 include Environmental Sustainability, Community Safety, Character, Access and Movement.

- 7.3.149 Chapter 3 is crosscutting and applies to several aspects of the Proposed Development. The documents which accompany this planning application, including the Planning Statement, Environmental Statement, and Design and Access Statement, demonstrate how design considerations have been integrated into the project through site selection, design evolution influenced by stakeholder consultation and early environmental assessment work, and that the Proposed Development would not give rise to any significant adverse effects. The Proposed Development would contribute to sustaining the valuable economic contribution that the business makes to the local and national economy.
- 7.3.150 Chapter 5 provides policy and guidance on ‘Productive and Enterprising Places’, which is the economic component of placemaking. Places which promote economic, social, environmental and cultural well-being by providing a well-connected employment and sustainable economic development are considered productive and enterprising.
- 7.3.151 This is to be achieved by ensuring that there is sufficient employment land to meet the needs and requirements of a range of future employment scenarios. Planning authorities are encouraged to support provision of sufficient land to meet the needs of the employment market, and wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration.
- 7.3.152 As noted above and discussed further in **ES Chapter 3.0 (Need and Benefits of the Proposed Development)** the Proposed Development provides significant economic benefits to Wrexham and Wales and therefore makes a positive contribution to this national policy goal.
- 7.3.153 Chapter 6 considers ‘Distinctive and Natural Places’, which includes the environmental and cultural components of placemaking. PPW11 advises that a prosperous Wales can be achieved by valuing the quality of the landscape and historic environment, which should be protected in their own right. They give places their unique identity and distinctiveness and provide cultural experiences and healthy lifestyles.
- 7.3.154 See summary of the Biodiversity and Nature Conservation ES Chapter at **Section 5.4** of this Planning Statement which demonstrates that the Site

has relatively low ecological value and that significant effects would be unlikely to arise. The EIA demonstrates that there would be minor beneficial effects for notable and priority habitats, on-site habitats, birds, and bats once newly created habitats via the Illustrative Landscape Masterplan are established.

7.3.155 See summary of the Historic Environment ES Chapter at **Section 5.3** of this Planning Statement which demonstrates no significant effects on designated and non-designated heritage assets, with the greatest effect being minor adverse in relation to Afon Bradley farm complex, Pontcysyllte Canal and Aqueduct WHS/SM, Chirk Castle Grade I listed building and Chirk Castle Grade I RPG.

7.3.156 Based on the above the Proposed Development constitutes sustainable development as defined within PPW11 and therefore there is a presumption in favour of granting planning permission for the Proposal.

TAN 5: Nature Conservation and Planning (2009)

7.3.157 TAN 5 identifies biodiversity conservation and enhancement as an integral part of planning for sustainable development, but that development can present a significant opportunity to enhance wildlife habitats.

7.3.158 Key principles of positive planning for nature conservation are identified. They include that nature conservation should be integrated into all planning decisions. Development should also look to provide for net benefits for biodiversity conservation with no significant loss of habitats or populations of species.

7.3.159 The presence of protected species, and whether there would be any disturbance or harm to species or habitats, is a material consideration when considering a proposal.

7.3.160 See summary of the Biodiversity and Nature Conservation ES Chapter at **Section 5.4** of this Planning Statement which demonstrates that the Site has relatively low ecological value and that significant effects would be unlikely to arise. The EIA demonstrates that there would be minor beneficial effects for notable and priority habitats, on-site habitats, birds,

and bats once newly created habitats via the Illustrative Landscape Masterplan are established.

TAN 11: Noise (2016)

- 7.3.161 TAN 11 concerns noise. It includes advice to be considered when determining planning applications, with local planning authorities advised to ensure that noise generating development does not cause an unacceptable degree of disturbance.
- 7.3.162 TAN 11 also advises on measures to mitigate the impact of noise, which fall into three categories: engineering, layout-out, and administrative.
- 7.3.163 See summary of the Noise and Vibration ES Chapter at **Section 5.5** of this Planning Statement which demonstrates that there would be no significant impacts during the construction or operation of the Proposed Development following the implementation of appropriate mitigation. The introduction of the lorry park results in HGVs being able to avoid the need to travel through part of Chirk town centre and the assessment shows that road traffic noise levels would be perceptibly reduced for those NSRs nearest to the existing entrance and north of the entrance off Holyhead Road. The Proposed Development therefore provides a beneficial effect with respect to noise.

TAN 12: Design (2016)

- 7.3.164 The purpose of TAN 12 is to equip all those involved in the design of development with advice on how 'Promoting sustainability through good design' and 'Planning for sustainable building' may be facilitated through the planning system. Of particular note is ways in which good design can be delivered through appraisal of the context and consideration of access, character, community safety, environmental sustainability and movement.
- 7.3.165 The accompanying **Design and Access Statement** sets out the design principles and concepts that have been applied and demonstrates how the Proposed Development takes context into account, and how issues relating to access to the Proposed Development have been dealt with.

TAN 15: Development and Flood Risk (2004)

- 7.3.166 The Site is not at risk from flooding from rivers or the sea but TAN 15 also advises on surface water runoff. Development should not increase flood risk elsewhere, which requires runoff to be properly managed.
- 7.3.167 Flooding from tidal and seas, surface water/pluvial flooding, groundwater, sewer and water mains, reservoirs, canals and artificial sources, and infrastructure failure have all been screened and are considered not to represent a significant flood risk. The Proposed Development includes an increase in impermeable coverage of 5.1ha, which if unmitigated could result in increases in the peak runoff rates from the Proposed Development Site. Therefore, the following SuDS Sustainable Drainage Systems (SuDS) features are proposed:
- Permeable paving underlain by geo-cellular crates.
 - Two attenuation basins.
- 7.3.168 The water would be discharged from the attenuation basins at a controlled rate into the Afon Bradley in the north-west of the Site.
- 7.3.169 Full details of the proposed SuDS together with details of all modelling and assumptions made are described in the Flood Consequence Assessment and Surface Water Drainage Strategy (**Planning Statement Appendix B**).

TAN 18: Transport (2007)

- 7.3.170 Section 2.3 of TAN 18 states that the integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development by: promoting resource and travel efficient settlement patterns; ensuring new development is located where there is good access by public transport, walking and cycling; managing parking provision; ensuring new development include appropriate provisions for pedestrians, cyclists , public transport, traffic management and parking; and ensuring that transport infrastructure to serve new development allow existing transport networks to continue to perform their identified functions.

- 7.3.171 The TA shown at **Planning Statement Appendix F** demonstrates that the proposed priority-controlled roundabout off the B5070 would be compliant with CD116 DMRB guidance, 'Geometric design of Roundabouts' and has suitable capacity for future development scenarios. The TA also demonstrates that parking provision is suitable and that the Proposed Development Site is well located for other forms of sustainable transport including pedestrian access, public transport, and cycling.
- 7.3.172 In addition to a CTMP which would be implemented to manage local disturbances during the construction period, additional mitigation measures are proposed to enforce the use of the north access road (rather than the existing access) via haulier management, driver monitoring, driver training, and driver notification.

TAN 23: Economic Development (2014)

- 7.3.173 TAN 23 provides advice on various aspects relating to economic development including developing high level economic planning objectives and assessing the economic benefits of new development.
- 7.3.174 Paragraph 2.1.1 states that *'It should not be assumed that economic objectives are necessarily in conflict with social and environmental objectives. Planning should positively and imaginatively seek such 'win-win' outcomes, where development contributes to all dimensions of sustainability'*.
- 7.3.175 The Proposed Development would provide enhanced facilities which would help maintain the future viability of the business at the site in Chirk. The investment would ensure the business can continue to meet customer demands in a competitive manufacturing environment, as well as delivering numerous environmental and social benefits. This investment would help to safeguard the significant direct and indirect employment opportunities supported by the business and the wider local and regional economic benefits which result from a major manufacturing business such as Kronospan.
- 7.3.176 Further details of the need and benefits of the Proposed Development is described at **Chapter 3.0** of this document.

TAN 24: The Historic Environment (2017)

7.3.177 TAN 24 provides advice on how the historic environment should be considered during development plan preparation and decision making on planning applications. Specific guidance is available on several aspects of the historic environment including:

- World Heritage Sites;
- Scheduled Monuments; and
- Conservation Areas.

7.3.178 Paragraph 1.26 of the TAN confirms that it is for the Applicant to provide sufficient information to allow the assessment of their proposals in respect of heritage assets.

7.3.179 See summary of the Historic Environment ES Chapter at **Section 5.3** of this Planning Statement which demonstrates no significant effects on designated and non-designated heritage assets, with the greatest effect being minor adverse in relation to Afon Bradley farm complex, Pontcysyllte Canal and Aqueduct WHS/SM, Chirk Castle Grade I listed building and Chirk Castle Grade I RPG.

Local Planning Guidance Notes

7.3.180 WCBC has produced Local Planning Guidance Notes on multiple topics; these notes expand on the detail provided in the UDP policies and provide further indication of the Council's approach to planning issues. The Local Planning Guidance Notes have been reviewed; some have been identified to be of relevance to the Proposed Development and are considered below. It should be noted that whilst effects on the Chirk Conservation Area have been considered within this application, specifically in relation to Policy EC7 of the UDP, the Local Planning Guidance Note 4 (Conservation Areas) is not relevant to the application as it deals solely with development *within* conservation areas.

Local Planning Guidance Note 7 – Landscape and Development

7.3.181 The note provides advice on the level of information required to form part of a planning application. This includes detailed survey information; details of

levels; trees and landscaping including species numbers, distribution and sizes; and the location of underground services.

- 7.3.182 See summary of the LVIA ES Chapter at **Section 5.2** of this Planning Statement which demonstrates that the Site has relatively low landscape value and that significant LVIA effects would be unlikely to arise.

Local Planning Guidance Note 17 – Trees and Development

- 7.3.183 The note reflects and elaborates on policy EC4 of the UDP. It aims to protect trees and to highlight their benefit as part of the design process. The Council notes the contribution that trees can make to the amenity of the landscape and streetscene and that they can add maturity to new developments, make places more attractive and soften the built environment.
- 7.3.184 Developments which would result in damage and / or inappropriate felling of significant trees (Category A and B) and hedgerows will not normally be permitted, with TPOs used to safeguard trees in appropriate cases. Development proposals near to existing trees must include appropriate protection. Where trees are to be lost, appropriate mitigation should be provided.
- 7.3.185 As part of the Arboricultural Impact Assessment (see **Planning Statement Appendix C**), a tree survey in accordance with BS5837:2012 (Trees in Relation to Design, Demolition and Construction – Recommendations) was undertaken. The survey recorded a total of 159 tree records which may be influenced by the Proposed Development.
- 7.3.186 Trees recorded include 121 trees, 21 tree groups and 18 hedges. One tree was recorded as Category A (T116), 36 trees were recorded as Category B, 121 trees as Category C and one tree as Category U.
- 7.3.187 A total of 88 trees, six complete tree groups, two part tree groups, six complete hedges and six part hedgerows would need to be removed to facilitate the Proposed Development. Five trees would require need pruning and/or tree protection barriers.

7.3.188 An extensive replanting programme has been developed to compensate for expected tree loss (see Illustrative Landscape Masterplan at **Planning Drawing 3**).

7.3.189 An Arboricultural Method Statement is recommended to ensure tree removal, retention pruning, and protection are managed correctly.

Local Planning Guidance Note 26 – Landscape and Industrial Development

7.3.190 This note aims to improve understanding of the landscape and environmental issues which the Council will take account of when determining applications for industrial development. It advocates that high-quality design can improve the image of a business, attract high-quality staff and encourage investment.

7.3.191 As described in Section 5, the Proposed Development is substantial in size, but would sit alongside other industrial buildings and structures as part of the wider facility. The intention is to use cladding which is pale grey (RAL 7038 goosewing grey) in colour on the east and north elevations to match the main warehouse building and respond to the trees and vegetation on the eastern side of the Site. Any views of the building from public or private areas outside of the Site would be minor and the colour of the cladding would reduce the visibility further. If the Council, neighbouring residents or other stakeholders have a different colour preference for the cladding then the Applicant would welcome the opportunity to discuss this and potentially agree this via a planning condition.

7.3.192 On the basis of the foregoing, it is considered that the principles of Local Planning Guidance Note 26 have been adopted.

Local Planning Guidance Note 29 – Employment Development and Nature Conservation

7.3.193 This Note provides advice regarding the key ecological issues and procedures that need to be addressed before undertaking development. The Note emphasises:

- The need for ecological assessment.
- The protection of habitats that are found in preference to mitigation or off-site compensation.

- The protection of the developable area of a site from colonisation from species.

7.3.194 Adopting the above, it should be possible to promote economic development while also protecting and enhancing the biodiversity and landscape of the estate and the wider area.

7.3.195 See summary of the Biodiversity and Nature Conservation ES Chapter at **Section 5.4** of this Planning Statement which demonstrates that the Site has relatively low ecological value and that significant effects would be unlikely to arise. The EIA demonstrates that there would be minor beneficial effects for notable and priority habitats, on-site habitats, birds, and bats once newly created habitats via the Illustrative Landscape Masterplan are established.

Local Planning Guidance Note 32 – Biodiversity and Development

7.3.196 The introduction to the Note identifies policies PS2, PS11, EC4 and EC6 of the adopted UDP as being relevant to it, all of which have been reviewed above. The Note reiterates the importance of biodiversity. It identifies a framework for considering the impacts of a development proposal on biodiversity:

- Information.
- Avoidance of harm.
- Mitigation, compensation, and new benefits.
- Monitoring, management, and compliance.

7.3.197 See summary of the Biodiversity and Nature Conservation ES Chapter at **Section 5.4** of this Planning Statement which demonstrates that the Site has relatively low ecological value and that significant effects would be unlikely to arise. The EIA demonstrates that there would be minor beneficial effects for notable and priority habitats, on-site habitats, birds, and bats once newly created habitats via the Illustrative Landscape Masterplan are established.

Local Planning Guidance Note 33 – Pontcysyllte Aqueduct & Canal World Heritage Site

- 7.3.198 The stated aim of the guidance note is to ensure the integrity of the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS), its buildings, structures and landscape are maintained. It sets out the need to consider the impact of Proposed Development on the World Heritage Site and its setting.
- 7.3.199 See summary of the Historic Environment ES Chapter at **Section 5.3** of this Planning Statement which demonstrates no significant effects on designated and non-designated heritage assets, with the greatest effect being minor adverse in relation to Afon Bradley farm complex, Pontcysyllte Canal and Aqueduct WHS/SM, Chirk Castle Grade I listed building and Chirk Castle Grade I RPG.

Wrexham Tree and Woodland Strategy 2016 - 2026

- 7.3.200 The Strategy identifies the importance of trees and the role they play in reducing air pollution and controlling flooding, as well as their value for wildlife and human health and wellbeing.
- 7.3.201 The Strategy also highlights the need to protect existing large trees, and that when planting trees consideration is given to the specimens that can grow into larger trees. A variety of species is encouraged to help protect against pests and diseases. There is a general ambition to increase urban tree cover.
- 7.3.202 As part of the Arboricultural Impact Assessment (see **Planning Statement Appendix C**), a tree survey in accordance with BS5837:2012 (Trees in Relation to Design, Demolition and Construction – Recommendations) was undertaken. The survey recorded a total of 159 tree records which may be influenced by the Proposed Development.
- 7.3.203 Trees recorded include 121 trees, 21 tree groups and 18 hedges. One tree was recorded as Category A (T116), 36 trees were recorded as Category B, 121 trees as Category C and one tree as Category U.
- 7.3.204 A total of 88 trees, six complete tree groups, two part tree groups, six complete hedges and six part hedgerows would need to be removed to

facilitate the Proposed Development. Five trees would require need pruning and/or tree protection barriers.

7.3.205 An extensive replanting programme has been developed to compensate for expected tree loss (see Illustrative Landscape Masterplan at **Planning Drawing 3**).

7.3.206 An Arboricultural Method Statement is recommended to ensure tree removal, retention pruning, and protection are managed correctly.

8.0 SUMMARY AND CONCLUSION

8.1 Need and Benefits of the Proposed Development

8.1.1 Kronospan has invested significantly in the Chirk manufacturing site in recent years to deliver environmental benefits and maintain the future sustainability and viability of this major regional employer.

8.1.2 As Kronospan looks to the future the Company recognises that further investment is required to meet its Vision 2025 ambitions which are to deliver:

- Economic sustainability – delivering a profitable and growing business.
- Environmental improvement – reducing our impact and supporting UK Net Zero targets through production of sustainable products and operations.
- Social benefit – maximising the value of our teams and developing our role in the community.

8.1.3 One of the key constraints limiting the operational efficiency of the Site is the fragility of the local electricity distribution network. The constrained supply of electricity from grid also limits the ability of the business to decarbonise. The proposed new 132kV substation would allow a connection to be made to the nearby strategic high voltage electricity line which runs from Oswestry to Legacy, Wrexham. This brings with it several benefits to local community by reducing the demand on the local network, mitigating the potential for local network failure, improved reliability for other businesses and community facilities and enhancing the opportunity for electric vehicle (EV) charging and provision of local renewable energy in Chirk. Removing reliance on the local distribution network would mean that Kronospan has a dependable power supply which will improve the operational efficiency of the Site, reduce the current dependence on the onsite fossil fuel-based generation facilities and enable the deployment of renewable technologies such as on-site PV electricity generation.

8.1.4 The provision of the north access road is something which has been requested by the local community for several years. The constraints which previously prevented the delivery of this have now been removed and

Kronospan has developed a proposal which would remove approximately 750 two-way HGV movements from the residential section of Holyhead Road over a 24-hour period (approximately 600 two-way movements during the daytime period, and approximately 150 two-way movements during the night-time period). This will have a variety of amenity and social benefits to the local community as well as improving the logistics arrangement at the Site.

- 8.1.5 The Proposed Development would provide enhanced facilities which would help maintain the future viability of the business at the site in Chirk. The investment would ensure the business can continue to meet customer demands in a competitive manufacturing environment, as well as delivering numerous environmental and social benefits. This investment would help to safeguard the significant direct and indirect employment opportunities supported by the business and the wider local and regional economic benefits which result from a major manufacturing business such as Kronospan.

8.2 Environmental Effects and Mitigation

- 8.2.1 The design evolution of the Proposed Development, as described in **ES Chapter 3.0 (Alternatives)** and the embedded mitigation measures described in the 'development design, impact avoidance and mitigation' sections of each of the topic chapters (**ES Chapters 5.0 to 8.0**) form a critical part of the Proposed Development subject to EIA. One of the key embedded mitigation measures is the Illustrative Landscape Masterplan which shows the planned extent of new native woodland planting, new native hedgerow planting, new specimen tree planting, new species-rich grassland and new wetland vegetation.
- 8.2.2 Further mitigation, monitoring and/or enhancement measures are proposed to further reduce the level of effect, for example, the installation of permanent screening at the proposed lorry park area and permanent screening close to the property of Bryn Hyfryd.
- 8.2.3 The EIA demonstrates that, with the implementation of embedded and additional mitigation, the residual effects would be acceptable in EIA and planning terms. Supporting assessments appended to this Planning

Statement also demonstrate that adverse effects can be appropriately avoided or mitigated.

- 8.2.4 The EIA demonstrates that there would be minor beneficial effects for notable and priority habitats, on-site habitats, birds, and bats once newly created habitats via the Illustrative Landscape Masterplan are established.
- 8.2.5 The introduction of the lorry park results in HGVs being able to avoid the need to travel through part of Chirk town centre and the assessment shows that road traffic noise levels would be perceptibly reduced for those NSRs nearest to the existing entrance and north of the entrance off Holyhead Road. The Proposed Development therefore provides a beneficial effect with respect to noise. Associated beneficial effects with respect to air quality are anticipated for the same reasons.

8.3 Planning Policy Context and Appraisal

The Statutory Development Plan

- 8.3.1 An appraisal of the Proposed Development shows that it is in accordance with UDP Policy PS2 and PS3 (The Broad Location of Development) which are strategic policies which aims to ensure that the quality of the natural environment is not detrimentally affected by development and that development is directed to brownfield land wherever possible.
- 8.3.2 The Proposed Development Site is not designated as open space and the landscape of the Site does not have any such features, characteristics or qualities that require extra protection (as demonstrated by the findings of the *Special Landscape Areas Study*).
- 8.3.3 It is not feasible to locate the Proposed Development elsewhere on previously developed land due to the location and nature of the surrounding land uses. Furthermore, UDP Policy PS3 focusses on greenfield land with ecological, landscape or amenity value, or comprises agricultural land of grades 1, 2 or 3a quality. The environmental assessments supporting this application demonstrate that the value of the Site with respect biodiversity, landscape and amenity value is low.
- 8.3.4 Except for policies associated with land outside of settlement limits/employment area and Green Barrier/Green Belt (summarised

separately further below), an appraisal of the Proposed Development against the remaining relevant policies of the UDP demonstrates that the Proposed Development would be in accordance with them. This is demonstrated in further detail in the following documents which confirm that where there is the potential for notable adverse effects, they can be appropriately managed and/or mitigated:

- ES Chapter 5.0 Landscape and Visual
- ES Chapter 6.0 Historic Environment: Archaeology Wales
- ES Chapter 7.0 Biodiversity and Nature Conservation
- ES Chapter 8.0 Noise and Vibration
- ES Chapter 9.0 Residual Effects and Conclusions
- Planning Statement Appendix A
 - **Agricultural Land Classification Survey**
- Planning Statement Appendix B
 - **Flood Consequence Assessment and Surface Water Drainage Strategy**
- Planning Statement Appendix C
 - **Arboricultural Impact Assessment**
- Planning Statement Appendix D
 - **Lighting Assessment**
- Planning Statement Appendix E
 - **Air Quality Assessment**
- Planning Statement Appendix F

Land Outside of Settlement Limit/Employment Area

- 8.3.5 The Proposed Development would require development outside of the existing settlement limit/employment area (as defined in the LDP). However, it would result in an overall benefit to the residents of Chirk by removing Kronospan HGV traffic from Holyhead Road which would have amenity benefits for local residents, improving on-site HGV parking provision and overall efficiency of ongoing operations. The Proposed Development would also improve the security of electricity supply to the Kronospan Facility and Chirk Town, which is currently susceptible to network capacity issues. The proposed substation would improve the manufacturing efficiency of

operations and free up capacity for renewable energy opportunities elsewhere in the County and the wider North Wales region. These benefits are described in more detail in Chapter 3.0 (Need and Benefits of the Proposed Development) of this Planning Statement.

- 8.3.6 The relative density of the existing Kronospan Facility and the presence and nature of the immediate surrounds means that the land to the north of the existing Kronospan Facility is the only practicable location for the Proposed Development. It is only by using the land to the north that the intended benefits of diverting HGV movements away from the main settlement would be realised.
- 8.3.7 The proposed location of the Proposed Development immediately adjacent the settlement limit/employment area (and the existing Kronospan Facility) would mean that it would be seen as a logical extension to the settlement limit/employment area and would not have a detrimental impact on the setting of the immediate land uses; This is considered to be in accordance with UDP Policy PS4.
- 8.3.8 As such whilst the Proposed Development is contrary to UDP Policy PS1 and UDP Policy E4 by virtue of its location outside of the settlement limit/employment area there are a range of unique factors which counter the policy tension which exists.

Green Barrier

- 8.3.9 The Proposed Development would constitute 'inappropriate development' in the Green Barrier/Green Belt and 'exceptional circumstances' (where other considerations clearly outweigh the harm) would need to be demonstrated (paragraph 3.74 of PPW11) to justify the Proposed Development.
- 8.3.10 It is considered that the nature of the Proposed Development Site and its immediate surroundings and boundaries means that this Site is not considered to perform a key role in the purpose of the wider Green Barrier at Chirk and that the Green Barrier (as a whole) would retain its capability to perform its core functions (as set out in UDP Policy EC1 and PPW11). This, together with the justification provided above at Section 8.2 of this Planning Statement with respect to the location of the Proposed Development and its clear need and benefits, means that it is considered

that the Proposed Development should be treated as an 'exceptional case' due to these considerations, on balance, combining to sufficiently outweigh the harm that the Proposed Development would otherwise do to the Green Barrier.

- 8.3.11 This conclusion is reinforced by the Wrexham Strategic Green Wedge Review (October 2017) undertaken as part of the evidence base for the LDP which states (with respect to coalescence and managing urban form):

'The existing gap combined with the lack of development pressure, indicates that there is not currently potential for coalescence to occur.... The topography of the area, which comprises the steep sided valley through which the River Dee runs, would act a barrier to the coalescence of the two settlements in this location.....the gaps between settlements mean that this type of erosion (of the area of settlement boundary bordering the area of green wedge) on the urban-rural edge would not lead to coalescence.'

- 8.3.12 The Wrexham Strategic Green Wedge Review (October 2017) goes on to conclude:

'The designation in this area does not sit in-between settlements in close proximity to each other. The topography of the area does allow wide views from certain vantage points. However, these larger expanses of land are not likely to come under the same development pressure, and do not sit in narrow gaps between settlements.'

It is therefore recommended that these areas be removed from the designation. Development in these locations would be controlled by the presence of an existing settlement boundary along with local policies presuming against inappropriate development in the open countryside. The area no longer designated as green wedge would still be afforded a high level of protection from development considered inappropriate in the open countryside. Notwithstanding the above, the area around Froncysyllte has a role in relation to the setting of the World Heritage Site and should be retained and extended in order to assist in this function.'

Other Material Planning Considerations

- 8.3.13 It is noted that the UDP is 11 years out of date and does not represent the Council's intended current and future ambitions for place-making within Wrexham County and decision-making on local developments.
- 8.3.14 The Examination of the LDP is complete and assessed as meeting the test of soundness by Planning and Environment Decisions Wales (PEDW). Despite Wrexham County Borough Council's (WCBC) Full Council decision not to adopt the LDP on 19 April 2023 and again on 14 June 2023, the LDP will now be subject to a Judicial Review. Given the status of the LDP, significant weight should be attributed to it in the determination of this planning application.
- 8.3.15 An appraisal of the Proposed Development against the relevant policies of the LDP demonstrates that the Proposed Development would be in accordance with it. In particular Part iii of Policy EM4 which supports the extension (outside of settlement limits) of an existing employment site (which is within a settlement limit or employment area) provided a) there are no suitable sites located within a settlement limit/employment area for the extension to be located and b) the new development would form a logical extension to the settlement limit/employment area.
- 8.3.16 Part iii of LDP Policy EM4 demonstrates an acknowledgment by WCBC that the principle of supporting future economic/employment growth is not always able to take place on existing employment sites and that extension into adjacent land is appropriate in certain circumstances.

Tests of the Planning and Compulsory Purchase Act 2004 and PPW

- 8.3.17 An assessment of the Proposed Development against the relevant planning policy and guidance has demonstrated that the Proposed Development is in accordance with the provisions of the statutory Development Plan when taken as a whole and so meets the principle test of Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 1.18 of PPW.
- 8.3.18 The Proposed Development has also been found to strongly accord with, and be supported by, a range of material planning considerations, including policies of the LDP.

- 8.3.19 Furthermore, it has been established that the Proposed Development constitutes sustainable development as defined within PPW and therefore there is a presumption in favour of granting planning permission for the development.
- 8.3.20 Based on the assessment contained in this Planning Statement the Proposed Development is deemed to represent sustainable development and will make a very important contribution to the delivery of the well-being goals set out in The Well-being of Future Generations (Wales) Act 2015.
- 8.3.21 For the reasons set out above, the applicant requests that permission be approved for the Proposed Development without delay.

ANNEX A
KRONOSPAN VISION 2025

A full-page photograph of a forest. Tall, slender trees with reddish-brown bark stand closely together. Sunlight filters through the upper canopy, creating a warm, golden glow and long shadows on the forest floor. The ground is covered in a thick layer of green moss and fallen branches.

Vision 2025: Investing in the future

Vision 2025: Investing in the future

The Kronospan site at Chirk underwent a major investment phase from 2015 to 2019, installing the latest production technology and reinforcing the future of the plant. We improved our value added production capacity by building a new press hall with additional plastic presses, a new MDF finishing line and an improved T&G line. We improved our raw material handling by building a new reception centre and storage silos for our incoming timber streams, and we increased our capacity for using recycled timber by building a new recycling tower and material refining plant. We also built a new power plant to enable us to become largely energy self-sufficient, and we upgraded our biomass boiler to enable us to reduce our gas consumption for our heat requirements.

Our path to Vision 2025...

Starting in 2021, we will move into a new investment phase, as we concentrate on improving site access, storage capacity and material handling in order to meet our customer's needs more efficiently.

We will further align our strategy with the UN Sustainable Development Goals and the UK Government net-zero strategy, by investing in ways to make the plant more sustainable through the economic, social and governance pillars of the sustainability model.

Timber panels will play a key part in sustainable housing, so we need to make sure we are equipped and ready to meet the demand. Our investment plans will place Kronospan Chirk in the best possible position for a secure and sustainable future as a circular economy company.

In addition to this, we will make bold energy infrastructure investments supporting a greener future for our site.

Some of the larger projects that we have planned: High Bay Warehouse for Raw Board and Paper

Construction has already started on our purpose built, automated high-bay warehouse. This will improve the handling efficiency of semi-finished goods, and will ensure complete traceability through the process. It will give us greater flexibility in our production process by automating the transfer of product to the facing lines, and it will reduce waste caused by manual handling. The warehouse will also incorporate a paper store to increase our storage capacity. This will add further flexibility and support the growth of our melamine faced ranges, which is key to our growth strategy. Furthermore, reducing the need to move products around with forklift trucks will reduce our energy consumption, which in turn will help us to decrease our carbon emissions.



High Bay Warehouse for Raw Board and Paper

East Road Warehouse and Front Despatch Yard Canopy

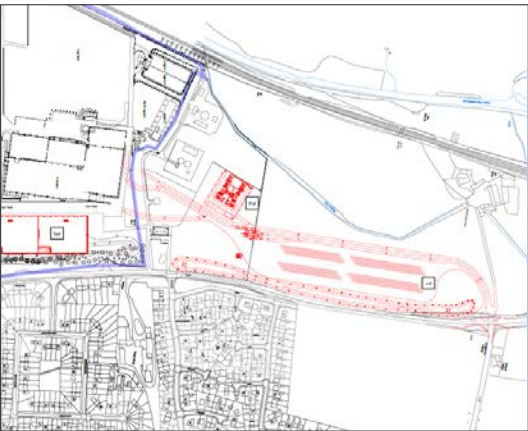
In addition to the high-bay warehouse, we will build further additional warehouses to increase our stockholding capacity. This will help us meet customer needs more effectively and increase our production efficiency through the factory, allowing us to reduce our energy consumption per unit by doing longer production runs. Crucially, more on-site storage will reduce our reliance on off-site warehousing, which is inefficient and generates avoidable emissions. By using on-site storage, we will save over 1,800 unnecessary vehicle movements. Additionally, the Front Despatch Yard Pre-pick and Undercover Loading Area will provide an undercover loading solution which will improve the quality of our service.



Engineers stores, workshop and training centre

At Chirk, we run a successful training program for engineering apprentices to support our future plans. We will build a bespoke workshop and training space to further improve our education facilities on-site, building on our commitment to develop the next generation of engineers and leaders. The new stores building for engineering spares will incorporate automated retrieval technology which will optimise our stock holding of spare parts, helping us both to reduce our working capital and to minimise downtime in the event of a mechanical breakdown.

Access Road



To help us reduce our impact on the local community, we will build a new road to access the plant. This will divert all site traffic away from the town, helping us improve the safety and wellbeing of our team and local community. With modern weighbridge facilities, we will improve the flow of traffic to the site and away from the existing pedestrian entrance.

132kv Connection and Solar Plant (PV)

In order to reduce our reliance on fossil fuels to create our own electricity, we plan to build a connection to the 132kv network. This will allow us to purchase electricity from a green energy source, without interfering with the supply to the local community. Furthermore, this will also give us the added option to install a solar plant to supply us with renewable energy.



132kv Connection & Solar Plant (PV)

New OSB Production Line



In order to meet the UK demand for OSB, we currently ship it in from one of our European sister sites. We plan to incorporate an OSB production line into the plant at Chirk manufacturing sustainable OSB in Wales with UK sourced timber. Domestic product will reduce our transport miles, global carbon emissions, enabling us to be responsive to the UK market as timber based construction grows.

And a few of our other projects...

Electrification of our FLT fleet

Electrification of our FLT fleet will reduce noise and particulate emissions in the warehouse, creating a better environment for our team and the local community.

Timber recycling centres

Developing our 'Urban Forest' national network of timber recycling centres will allow us to secure our future supply of recycled timber, supporting our circular economy goals of locking thousands of tonnes of carbon into our chipboard products.



Others

Further projects will include the construction of two additional storage silos in our logyard, doubling our recycled timber storage capacity and increasing the sustainability of our finished product. By keeping the timber dry, we will reduce the energy needed to remove moisture.

Investing in our people will see us upgrade our office space giving teams a modern, productive and sustainable environment to work in. Alongside this we will be adding electric vehicle charging points to our car park to help our team and visitors to make sustainable choices for their commutes.



Electrification of our FLT Fleet

At Kronospan, we have big plans for a bright future. Our shareholders are committed to an investment program that promotes sustainability and the circular economy, which is why our plans have been built around the needs of all of our stakeholders. We believe that our products have a big role to play in the UK's journey to net-zero, and we will make them in the cleanest, greenest and most efficient way possible.