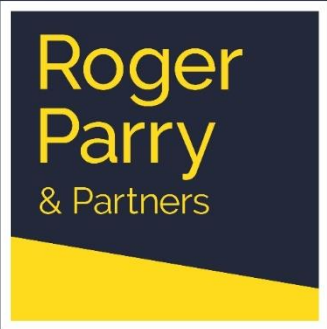

Landscape Visual and Design Considerations – Additional Information

Erection of an Organic Free
Range Egg Unit Including a
Packing/Storage Building and
Associated Works

Prepared for E & J Morris

Roger Parry & Partners LLP
www.rogerparry.net
richard@rogerparry.net
Tel: 01691 655334

The logo for Roger Parry & Partners is located in the bottom left corner. It consists of a white square containing the text "Roger Parry" in a large, bold, yellow sans-serif font, with "& Partners" in a smaller, yellow sans-serif font below it. The square is set against a dark blue background that features a yellow triangular shape in the top left corner and a yellow trapezoidal shape at the bottom.

**Roger
Parry**
& Partners

Introduction

Following comments received with regards to Landscape Impact and the Landscape and Visual Impact Assessment that was produced as part of the planning application for an organic free range egg unit, this report sets out a response to these comments.

Landscape and Visual Impact

A Rebuttal to the Landscape and Visual Impact Assessment was submitted in April 2021 by Richards, Moorehead and Laing Ltd. This has been reviewed by Viento Environmental Ltd who produced the Landscape and Visual Impact Assessment on behalf of the applicant, and their letter dated 22nd June 2021 is included within the appendices (Appendix 1):

Key Points from Viento in response to RM&L Report

Firstly, we would reiterate that the methodology set out within the Landscape and Visual Assessment undertaken by Viento Environmental in September 2020 conforms to the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) (LI & IEMA, 2013). GLVIA3 recommends that for non-EIA development such as this, an assessment of significance is not required, and that the assessment should also be proportionate to the scale of the project and the nature of its likely effects.

We note that the RM&L report has identified in paragraph 2.2.30 that our landscape and visual assessment acknowledges sizeable earthworks are proposed as part of the application. However, we also note that the RM&L report does not seem to recognise the approximate 15,000m² of native planting that is also proposed as part of the application which has led us to consider that, on balance, the effects on landscape fabric would be beneficial overall in paragraph 81 of our report. We would argue that we have acknowledged and considered fully the adverse effects on the landform of the site as a result of the proposals, whilst also considering and balancing the beneficial effects of the planting proposals. We would also draw your attention to the existing Cae Mor poultry unit to the east of the site where earthworks were also undertaken as part of the implementation of the development and how these changes to the landform have integrated over the last few years in combination with the planting proposals at that site.

The RM&L report includes photographs from some residential properties in the local area as private residential views. The landscape and visual assessment submitted with the application was not in a position to acquire private views from residential properties and instead provides a suitable level of detail on residential views relevant to a sub-EIA level application as well as viewpoints located in close proximity to residential properties to give an indication on the types of views of the proposal that may be expected. In respect of private views and visual amenity, it is worth reiterating that in planning law one does not have 'a right to a view'.

In addition we have provided A3 single frame versions of each of the viewpoints, focusing on the section of the view within which the proposal would be located (Type 1 visuals). These should all be viewed at a distance of 500mm and in conjunction with the A3 viewpoint panoramas provided as part of the main submission. However, we would reiterate that these photographs should not be used as a substitute for visiting the viewpoints in the field.

Supporting Landscape Visual Information

Technical Advice Note 6 – Planning for Sustainable Rural Communities

Design, Appearance and Siting (Advice for Farmers and Developers)

A14: The siting of a new agricultural or forestry building, road, excavation or waste deposit, or fish tank can have a considerable impact on the surrounding landscape. Developments should be assimilated into the landscape without compromising the functions they are intended to serve. New buildings should normally form part of a group rather than stand in isolation, and relate to existing buildings in size and colour. However, new buildings of modern design may sometimes best be separated from a group of traditional buildings to avoid visual conflict. Sites on skylines should be avoided. To reduce visual impact, buildings should be blended into the landscape or, on sloping sites, set into the slope if that can be achieved without disproportionate cost.

- The proposed buildings and access roads are in close proximity to an existing free range egg unit run by the applicant that measures 76m x 19.8m. The proposed buildings will be the same colour and design as the existing unit but measuring 45m x 18m. The proposed development has been located away from the farmstead of Cae Mor due to its modern specialist agricultural design. The buildings are to be located on a sloping site and will be set into the slope to avoid any skyline views. We believe that the siting of the buildings considers fully TAN6 A14 without any disproportionate costs.

A16: The siting of new agricultural or forestry buildings adjacent (but not too close) to existing woods may help to assimilate them into the landscape. Suitable materials and suitable woodland management will be required to maintain this effect. Elsewhere judicious tree planting and external works may enhance new buildings. The aim should not be to hide a building from sight, but rather to soften a hard outline, break up a prominent silhouette, minimize its impact on the landscape and help anchor a new building to the surrounding landscape. Any new planting should reflect the existing vegetation type or be part of an approved Better Woodlands for Wales Grant Scheme application.

- The proposed development is surrounded by mature hedgerows with hedgerow trees. A substantial landscaping plan has been submitted to include new native tree belts/woodland areas within the site area to the north, south, southeast and west of the development as well as areas located between the proposed building and along parts of the access track. This will aid the integration of the buildings into the area as well as adding enhancements to local landscape fabric.

Design and Planning Considerations

1. We have met Policy EC3 of the Wrexham Unitary Development Plan 1996 – 2011 ('UDP') which is permissive of new agricultural buildings unless the proposal would have a detrimental impact on the environment or surrounding landscape. The application forms part of an existing farm complex and takes advantage of topography and other landscape features for screening. We have an essential agricultural need and have explored all other reasonable alternative locations for the development we are in the appendices.
2. The application lies within a Special Landscape Area that is the subject of UDP Policy EC5 which states that: priority will be given to the conservation and enhancement of the landscape; and 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. We can confirm that the application site would be development for agriculture.
3. We have met UDP Policy EC5 by conforming to a high standard of design and landscaping, with special attention paid to minimising its visual impact both from nearby and distant viewpoints. The careful siting of the proposal set into the local landform would take advantage of local vegetative and topographical screening. In addition, the splitting of the development into a series of separate buildings would allow the maximisation of additional vegetative screening from sensitively located mitigation planting. Overall, 15,000m² of new native planting is proposed as part of comprehensive mitigation proposals associated with the application.

Whilst the introduction of the proposed development may be a noticeable addition within the landscape immediately surrounding the site, the limited height of the development and the good levels of existing localised vegetation would assist in integrating the proposal into the local area. This has been the case for the nearby existing poultry unit building which was built in 2017. Now operational, this existing poultry unit is largely screened from view from the majority of the study area by local topography and vegetation much in the same way as the proposed development would be.

In landscape character and visual amenity terms, in combination with the planting proposals, the proposed development would be a suitable fit within the context of its immediate surroundings and would result in limited changes to views and landscape character within the local area as illustrated by the viewpoint associated with this study.

4. Constructing the scheme would result in a disturbed area that extends well beyond the footprint of the building as 'cut and fill' operations establish the level platforms for the building and vehicle turning area. During the construction period these works would cause the appeal site to become very apparent when viewed from various points across the valley. The proposed building is to be constructed in Juniper Green

to blend with the greens around it and the disturbed and re-profiled soils will be seeded/planted, reducing the initial prominence of the development in the landscape.

5. Whilst the introduction of the proposed development may be a noticeable addition within the landscape immediately surrounding the site, the limited height of the development and the good levels of existing localised vegetation would assist in integrating the proposal into the local area. This has been the case for the nearby existing poultry unit building which was considered acceptable in landscape character and visual amenity terms at planning appeal in 2016/17. Now operational, this existing poultry unit is largely screened from view from the majority of the study area by local topography and vegetation much in the same way as the proposed development would be. See photo of existing unit in Appendix 2.
6. The careful siting of the proposal set into the local landform would take advantage of local vegetative and topographical screening. In addition, the splitting of the development into a series of separate buildings would allow the maximisation of additional vegetative screening from sensitively located mitigation planting. Overall 15,000m² of new native planting is proposed as part of comprehensive mitigation proposals associated with the application.
7. The application scheme would add structures of considerable scale to an elevated and overlooked position on the hillside. Even so, the proposed building would be a relatively low structure with a pitch roof ridgeline 6.03m high and venting structures projecting above it to 7.17m. Its scale also needs to be considered within its context.
8. Alternative locations for the development have been considered within the landholding of Cae Mor Farm. See Alternative Sites in Appendix 3.
9. The proposed buildings would add a new feature to views taken of and from the hillside. It would be distinctive through its scale, design, and the cohesiveness of the contemporary built form. However, the development would clearly be agricultural in character and evidence has confirmed the necessity of its scale to respond to changing agricultural markets.
10. Activity associated with the proposed development would be agricultural in nature.
11. The application would introduce agricultural buildings into some views from Cae Mor. However, there would be a significant level of separation between Cae Mor and the proposed structures. These factors would ensure that the setting of the listed buildings at Cae Mor would remain open fields.
12. The particular circumstances of this application and farm, along with the proximity of existing development to that proposed, indicate that while the application site would not extend an existing farm yard, nor would it result in an isolated structure.
13. The proposed development would have an acceptable impact on the character and appearance of the locality and, overall, complies with UDP Policy EC3 and would meet the requirements and objectives of UDP Policy EC5, along with the relevant parts of Planning Policy Wales – 9th Edition.

14. The proposed buildings are a contemporary structure that evidence confirms to result from, and responds to, changing agricultural markets and the economies of scale required to meet them.

15. We refer to you the AONB response dated 14th April (Appendix 4) which states that:

“Although it will be visible in distant views from the AONB, the specification of Juniper green walls, roof and silos, coupled with the relatively low profile of the buildings and extensive landscape planting will help mitigate its visual impact. In this context, it will appear as a small element in the wider landscape and will not have a significant adverse impact on the AONB and the Joint Committee therefore has no observations to make on the application in principle”.

Appendices

Appendix 1 – Letter from Viento Environmental

Appendix 2 – Photo of Existing Poultry Unit at Cae Mor

Appendix 3 – Alternative Sites Assessment

Appendix 4 – AONB Response

Appendix 1



Mr Richard Corbett
Roger Parry & Partners
20 Salop Road
Oswestry
SY11 2NU

Our ref: Cae Mor 220621.doc
Our contact: Fran Iribar
email: fran@viento-env.co.uk
Date: 22nd June 2021

Dear Richard

Cae Mor Proposed Organic Poultry Unit

As requested, we have reviewed the Richards, Moorhead & Laing Ltd (RM&L) report dated April 2021 and would like to provide some pertinent responses.

Firstly, we would reiterate that the methodology set out within the Landscape and Visual Assessment undertaken by Viento Environmental in September 2020 conforms to the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) (LI & IEMA, 2013). GLVIA3 recommends that for non-EIA development such as this, an assessment of significance is not required and that the assessment should also be proportionate to the scale of the project and the nature of its likely effects.

We note that the RM&L report has identified in paragraph 2.2.30 that our landscape and visual assessment acknowledges sizeable earthworks are proposed as part of the application. However, we also note that the RM&L report does not seem to recognise the approximate 15,000m² of native planting that is also proposed as part of the application which has led us to consider that, on balance, the effects on landscape fabric would be beneficial overall in paragraph 81 of our report. We would argue that we have acknowledged and considered fully the adverse effects on the landform of the site as a result of the proposals, whilst also considering and balancing the beneficial effects of the planting proposals. We would also draw your attention to the existing Cae Mor poultry unit to the east of the site where earthworks were also undertaken as part of the implementation of the development and how these changes to the landform have integrated over the last few years in combination with the planting proposals at that site.

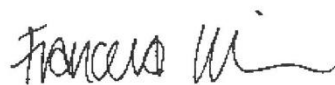
The RM&L report includes photographs from some residential properties in the local area as private residential views. The landscape and visual assessment submitted with the application was not in a position to acquire private views from residential properties and instead provides a suitable level of detail on residential views relevant to a sub-EIA level application as well as viewpoints located in close proximity to residential properties to give an indication on the types of views of the proposal that may be expected. In respect of private views and visual amenity, it is worth reiterating that in planning law one does not have 'a right to a view'.

Accompanying this letter, we have provided A3 single frame versions of each of the viewpoints, focusing on the section of the view within which the proposal would be located (Type 1 visuals). These should all be viewed at a distance of 500mm and in conjunction with the A3 viewpoint panoramas provided as part of the main submission. However, we would reiterate that these photographs should not be used as a substitute for visiting the viewpoints in the field.

Viento Environmental was commissioned to undertake the landscape and visual assessment for the Cae Mor proposed organic poultry unit in August 2020 and the work was completed in September 2020 within the end of the summer season where trees and all vegetation remained in full leaf. As a result, winter photography was not undertaken.

We hope that this information is useful, although if you have any queries at all, please do not hesitate to get in touch.

Yours sincerely
for Viento Environmental Limited

A handwritten signature in black ink, appearing to read 'Francisco Iribar', with a stylized flourish at the end.

Fran Iribar
Director

Enc: VPS 1-7 A3 single frame views.

Appendix 2



Appendix 3

Site 1



This option considers 4 separate buildings located on land to the North of Cae Mor and a revised access point from an unclassified road.

- Access off an unclassified road which has a steep gradient is not sufficient for access and egress of feed delivery and egg collection vehicles.
- The positioning of the buildings are not central to the ranging area and would not meet the required ranging area requirements .
- The positioning of the buildings in this location would have a detrimental effect on Cae Mor which is a Grade 2 listed building.

 Site 2



This option considers the location of 4 individual buildings with individual packing rooms connected by link roads between the buildings.

- Access roads will be required between each building that will be very prominent covering a large area of land.
- Buildings 1 and 2 are located close to Cae Mor which is Grade 2 listed and could have a detrimental effect on the listing.
- Egg collection will be required on each individual building that will make the project cost prohibitive.

Site 3



This option considers 1 building located centrally within the ranging area.

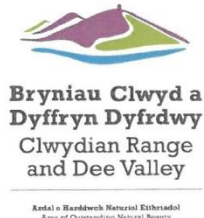
- The building would be of a size approximately 40m x 90m which would be more cost effective to build but form a large footprint.
- Access road is served from a B road which is suitable for access and egress.
- This is the most effective scheme form a management and cost point of view



This option is the preferred design which considers 4 smaller buildings.

- Access road is served from a B road which is suitable for access and egress.
- The buildings would be small in size and scale.
- The buildings are centrally positioned within the ranging area.
- The buildings do not create any impact on the listing of Cae Mor.

Appendix 4



Bryniau Clwyd a Dyffryn Dyfrdwy AHNE
Park Gwledig Loggerheads, Yr Wyddgrug, Sir Ddinbych CH7 5LH

Clwydian Range and Dee Valley AONB
Loggerheads Country Park, Nr. Mold, Denbighshire CH7 5LH

Ffon | Tel: 01352 810614 | Ffacs | Fax: 01352 810644
E-bost | E-mail: clwydianrangeanddeevalley@denbighshire.gov.uk
Gwefan: www.ahnebryniauclwydadyffryndyfrdwy.org.uk/
Web: www.clwydianrangeanddeevalleyaonb.org.uk/

 www.facebook.com/Clwydian Range & Dee Valley AONB

 @Clwyd_De_AONB

Cyf | Ref: P/2021/0077

Dyddiad | Date: 14 April 2021

Simon Greenland
Planning Services
Wrexham County Borough Council
WREXHAM
LL11 1AY

Dear Mr Greenland

PROPOSAL: Organic Free Range Egg Production Unit and all Associated Works.

LOCATION: Cae Mor Farm, Llwyn Mawr, Pontfadog, Llangollen LL20 7BE

This application has been brought to the attention of the AONB. The following observations are submitted on behalf of the Joint Committee following consultation with the Chair of the committee and the AONB Partnership Landscape Character and Built Environment Working Group.

"The Joint Committee notes that the application site is approximately 4 km outside the AONB but, having regard to the large size of the proposed building complex (3371sqm), it will be visible in distant views from the higher ground of the AONB to the north. The visual impact is more pronounced as a result of the sporadic siting of the unit in open countryside away from the main farm complex or other existing buildings. Siting as a logical extension of the existing farm complex would be preferable, but it is assumed that the current siting is a necessity for such a potentially 'bad neighbour' development and to conserve the setting of the Listed farmhouse.

Although it will be visible in distant views from the AONB, the specification of Juniper green walls, roof and silos, coupled with the relatively low profile of the buildings and extensive landscape planting will help mitigate its visual impact. In this context, it will appear as a small element in the wider landscape and will not have a significant adverse impact on the AONB and the Joint Committee therefore has no observations to make on the application in principle. The Committee notes however that whilst the impact on the AONB is limited there will be more significant impacts on the immediate locality.

If permission is granted, the Committee would emphasise the need to secure the earliest possible implementation of the full landscaping proposals. All new planting should be native local species and must be suitably protected from stock. The committee would also recommend that a 5 year landscape management plan is required to ensure the proper establishment and long term continuity of the landscape mitigation measures.

The lighting design scheme submitted with the application is noted, but the committee would recommend a condition requiring submission of precise details of the proposed luminaires, including their outputs, colour temperature, and operational timing to ensure the lighting is the minimum necessary for safe operations and is designed to conserve the AONB's dark sky and nocturnal wildlife."

I would be grateful if you could take account of the committee's views when deciding this application.

Yours sincerely,

Tony Hughes
For the Clwydian Range and Dee Valley AONB Joint Committee

