



KRONOSPAN, CHIRK

**PLANNING APPLICATION FOR THE DEMOLITION OF
THE EXISTING RECEPTION BUILDING AND THE
ERECTION OF A BUILDING TO CREATE A COVERED
LOADING YARD, NEW RECEPTION BUILDING,
FENCES, GATES AND ALTERED INTERNAL ACCESS,
AND ANCILLARY WORKS**

PLANNING STATEMENT

MARCH 2022

The axis logo consists of a dark blue square with the word 'axis' in white, lowercase, sans-serif font.

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Planning Application Drawings and Figures

Drawing / Figure Number	Drawing Title
3046-01-01	Statutory Plan
7000/665 A	Covered loading yard – Elevations and plan view
7000/699 A	Covered loading bay – Steelwork proposal
21110-P-1	Topographic Survey
Figure 1	Site Location Plan
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Appendices

Appendix A – Landscape and Visual Impact Assessment

Appendix B – Arboricultural Impact Assessment

Appendix C – Ecological Impact Assessment

Appendix D – Noise Impact Assessment

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FOREWORD

This document is the Planning Statement for the proposed covered loading yard and associated works in the Kronospan Facility (hereafter referred to as the 'Facility'). The proposed extension is within the southern curtilage of the main warehouse building on the site of the existing reception and office building.

Kronospan is an important local and national business. In 2020, it was the 9th largest manufacturing business in Wales and provides direct employment for over 600 people of which 90% live within 10 miles of the site. As such, ensuring that the Kronospan site in Chirk remains a competitive and sustainable business is important to the local and national economy. The proposed development would allow for improved efficiency and to safeguard existing jobs.

The proposed development forms part of an ongoing development programme which started with Vision 2020 to modernise, future proof and improve the site, and which is continued with Vision 2025.

Vision 2025 is the next phase of improvements and includes significant investment in the future. There will be a focus on improving site access, storage capacity and material handling in order to meet customer's needs more efficiently. This will further align Kronospan's strategy with the UN Sustainable Development Goals and the UK Government's net-zero strategy, by investing in ways to make the plant more sustainable through the economic, social and governance pillars of the sustainability model.

This current proposal would see the covering of the front loading yard which would improve the quality of the service and reduce potential for damage to products. It would also provide improved conditions for employees. There would be a benefit to the Chirk by reducing noise from the site. This would be achieved by enclosing the existing activities within the proposed building. Overall, the development is being carried out to ensure the long-term economic viability of the manufacturing facility.

In addition to this Planning Statement and its associated technical reports, the planning submission comprises the requisite planning application form and certificates, Design and Access Statement, and planning drawings.

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 demolition of the existing reception building and the erection of a building to create a covered loading yard and ancillary works which is described in Section 2 (hereafter referred to as the 'Proposed Development' or the 'Proposal').

1.1.2 The Proposed Development is an extension to the existing main warehouse building within the Kronospan manufacturing facility to create a covered loading yard and storage area to facilitate site operations. The Kronospan Facility is located on the industrial site that forms part of Maesgwyn Farm off Holyhead Road, Chirk, Wrexham (hereafter referred to as 'the Site'). The location of the Proposed Development is shown on drawing Figure 1.

1.1.3 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).

1.1.4 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.

1.1.5 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;
- Oriented Strand Board (OSB) Facility; and
- New Warehouse building to north eastern part of the Kronospan Facility.

1.1.6 The locations of the four most recent proposals are shown on Figure 2. The last two have yet to be implemented.

1.1.7 The additional 6,382sqm (GEA) of floorspace would be used for the loading of product and for a pre-picking solution prior to being exported from the manufacturing facility. It would complement the existing operations on Site and simplify the logistics of getting the product to customers. The demands of customers have also changed particularly during the pandemic and Kronospan is seeking to respond to them.

1.1.8 The Proposal would enhance the manufacturing facility's capability and improve the long term sustainability of the business at the Chirk site. There are several key benefits. There would be a reduction in noise to the east of the Site, particularly the residential properties on Maes Y Waun and Maes Y Ysgol. This is because the current activities would be internalised within a building which would feature 100mm insulation to both the roof and walls. The Proposed Development would also improve the working conditions for employees, especially in the winter for those employed in the press halls and for those who currently load the products outside. There would also be a benefit to the process and the quality of the service that Kronospan can provide: having a sheltered solution streamlines the loading process and protects products from increased volatility in the weather due to climate change.

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
- Design and Access Statement

- Pre Application Consultation Report
- Planning Statement and supporting studies comprising
 - Landscape and Visual Impact Assessment
 - Arboricultural Impact Assessment
 - Ecological Impact Assessment
 - Noise Impact Assessment
 - Heritage Desk Based 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 and its construction.
- Section 3.0 describes the need and benefits of the scheme.
- 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 currently proposed by Kronospan.
- 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 development accords with that context.
- Section 8.0 provides the conclusions to this statement.

1.3 Environmental Impact Assessment Screening

- 1.3.1 The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 prescribe the types of development for which EIA is mandatory (Schedule 1 development) and others which may require an assessment if they have the potential to give rise to significant environmental impacts (Schedule 2 development).
- 1.3.2 The Proposed Development falls within the description at paragraph 8(a) in column 1 of the table in Schedule 2 to the Regulations (i.e. Industrial plants for the production of paper and board). The Proposed Development

exceeds the applicable threshold in column 2 of that table (new floorspace exceeding 1,000 square metres). As such it is necessary to consider whether the development is likely to give rise to significant environmental effects.

- 1.3.3 A number of assessments have been conducted in support of this application, focusing on the elements of the Proposal considered most likely to result in adverse environmental effects i.e. landscape, visual, heritage, trees and noise. The assessments demonstrate that there would be no significant environmental effects from the Proposed Development, either alone or in combination with the existing and other proposed developments at the manufacturing facility. As such the Proposal is not considered to represent EIA development and therefore this planning application does not need to be accompanied by an Environmental Statement.

1.4 The Site and its Context

- 1.4.1 The Proposed Development comprises the extension to the main warehouse building to create a covered loading yard. The location for the Proposed Development is within the existing Kronospan Facility, which is located on land adjacent to Holyhead Road (the B5070).
- 1.4.2 The covered loading yard would be located towards the south of the manufacturing facility, near to the existing site entrance. It would be sited where the existing entrance, foyer and reception / office space is currently positioned, which would be demolished to make way for the Proposal. The existing weighbridge and gatehouse would remain in situ on the Site in the same location, as vehicles would pass through this entrance to enter the main warehouse building and covered loading area. The office space would be relocated to the farmhouse building to the west of the Site. The new reception would be located on the lime avenue to the south of the south-west corner of the Proposed Development. There would also be a pedestrian access (including turnstiles)
- 1.4.3 The entirety of the Kronospan Facility covers an area of circa 40ha, with circa 14ha of this developed with industrial buildings and plant. Figure 1 shows the layout of the Kronospan Facility. A number of industrial process facilities are located in the western half which are used to process, sort and

dry the raw wood materials used in the manufacture of MDF / PB. These include a number of tall structures, including stacks, that emit clean process emissions to the atmosphere. The tallest structure within the Facility is the combined heat and power (CHP) biomass plant stack which is 70m in height.

- 1.4.4 A number of process buildings are located in the northern half of the Facility including: a sawmill, formalin plant and the secondary product manufacturing facility (*Kronoplus*) which produces laminate flooring and worktops.
- 1.4.5 Kronospan has recently obtained a resolution to grant planning permission (subject to the signing of the S.106 Legal Agreement) from the Planning Committee on 1st November 2021. This is for a new warehouse building (application reference: P/2021/0725), located in the north-east of the manufacturing site, which will deliver a further 15,029 sq.m. of floorspace (GEA). This recently consented planning application also includes a new sprinkler tank located between the northern extent of *Kronoplus* and the manufacturing site's northern boundary.
- 1.4.6 The western perimeter of the Kronospan Facility is formed by the Shrewsbury to Chester railway. Improved railway siding facilities have been constructed within the site to enable an increased volume of timber to be imported by rail. The Llangollen Canal is located to the west of the railway line, circa 30m from the boundary of the site at its closest point. The canal is designated as the Pontcysyllte Aqueduct and Canal World Heritage Site and as a Scheduled Monument. Water is abstracted from the canal for use in the manufacturing process. The eastern perimeter of the manufacturing site is formed by Holyhead Road (B5070). An earth bund, planted with trees, has been developed along the eastern perimeter of the facility in order to reduce the visibility of Kronospan operations from neighbouring properties on Holyhead Road.
- 1.4.7 A sewerage pumping station and one property, owned by Kronospan, are located to the immediate north of the site. To the immediate south of the Kronospan Facility is the Cadbury's (Mondelez) factory, the Chirk AAA sports ground and the Chirk recreational ground.

- 1.4.8 Surface water for the majority of the manufacturing site currently drains to two lagoons located on the northern boundary of the manufacturing facility, each of 2,033sqm in volume. A third lagoon was constructed to take surface water from the log yard.
- 1.4.9 The main residential area of Chirk is located to the east of the manufacturing site with residential properties lining the majority of the eastern side of Holyhead Road. Ysgol Y Waun Primary School is located off of Chapel Lane approximately 270m to the east of the Site. Chirk town centre is located approximately 500m to the south and south east of the site and parts of the town centre are designated as Chirk Conservation Area.
- 1.4.10 The wider area beyond the urban settlement of Chirk is dominated by agricultural fields and woodland. Chirk Castle (Grade 1 listed) and its grounds (Registered Park and Garden) are located circa 500m to the west of the manufacturing site, beyond the canal. The Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) also lie to the west of the site, the closest boundary of the AONB runs concurrent with the grounds of Chirk Castle.

Access

- 1.4.11 The Proposed Development would not result in any change to the existing site access arrangements.
- 1.4.12 The 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).
- 1.4.13 The existing railhead and sidings within the site are used to import timber for the manufacturing process as well as import via HGV.

1.5 The Applicant

- 1.5.1 The Applicant is Kronospan Limited. The company has existed for over 120 years and has operations in over 22 countries. 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.
- 1.5.2 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.
- 1.5.3 The Kronospan manufacturing facility is a major local employer within Wrexham County Borough Council (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.

1.6 Pre-Application Consultation

Wrexham County Borough Council

- 1.6.1 Formal pre-application advice was obtained from Wrexham County Borough Council (WCBC) on 7th January 2022, regarding the proposed extension to the main warehouse building, who responded:

'The extension would be viewed in the context of both the existing building as well as buildings and structures within the wider Kronospan site... whilst the impact of the development would need to be considered via a Landscape and Visual Impact Assessment. The impact of this particular proposal upon the setting of Chirk Conservation Area would need to be considered. Nevertheless, I consider it unlikely that the proposals would be considered as harmful to the landscape surrounding Chirk, the setting of the WHS or views from or the setting of the AONB or the setting of the Conservation Area.'

- 1.6.2 A Landscape and Visual Impact Assessment has been carried out on the site of the Proposal to understand if there would be any significant impacts. Details of this assessment are found at section 5.2 of this report and at Appendix A.
- 1.6.3 The form and content of this application was then confirmed through further correspondence with WCBC.

Community Consultation

- 1.6.4 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.
- 1.6.5 The purpose of the pre-application 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.
- 1.6.6 Community and Specialist consultees were provided notice in writing of the proposed application in accordance with Article 2D of the DMPO 2016. Community consultees were provided details of where the draft application was available to view and specialist consultees were provided with copies of the draft application. Notices were provided to the Neighbour consultees and site notices were posted at 4 locations near the site which have been used by WCBC to post notices of planning applications in the area.
- 1.6.7 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) for public viewing during regular office hours from 8:30am to 4.30pm between **25th February 2022** and **25th March 2022**. No visitors viewed the draft planning application at reception.
- 1.6.8 Throughout the consultation period the documents were also made available to view on the Kronospan website (<https://www.chirk->

kronospan.info) and the planning agent's consultation website (<https://www.axisped.co.uk/>).

- 1.6.9 The consultation undertaken by the applicant and the feedback received is described in the Pre Application Consultation (PAC) Report submitted as part of this planning application. This section of the Planning Statement briefly outlines the consultation that has been undertaken.

2.0 THE PROPOSED DEVELOPMENT

2.1 Introduction

- 2.1.1 This section of the Planning Statement provides a description of the layout and design of the Proposed Development, together with details of its construction. It also outlines the processes that would take place at the facility.

2.2 Layout and Design of the Proposed Development

- 2.2.1 The proposed general arrangement, floor plan, elevations and sections are shown on drawing 7000/665.
- 2.2.2 The Proposal would consist of extending the existing main warehouse building to the south within its curtilage, to meet the existing most southerly extent of the main warehouse's building line fronting the access road. The extension to the main warehouse building would be sited within the existing loading yard area, the main reception building, a weighbridge and gatehouse, hardstanding, road surface, and some landscaping.
- 2.2.3 This Application Site is bound by the main warehouse building to the west, north, and partially to the east, forming an outline for the main warehouse building to be extended into, infilling the existing warehouse up to the main access road.
- 2.2.4 The existing reception building and offices on the Site would need to be demolished to make way for the covered loading yard. The weighbridge, gatehouse, and access road into the main warehouse would remain in situ on the Site in their existing locations, with the covered loading yard tucking behind these structures to meet the existing 'Warehouse Bay 5 Extension' building to the east. Part of the access road would be covered by the new roof linking the covered loading yard to the 'Warehouse Bay 5 Extension' area.
- 2.2.5 The proposed covered loading yard would provide for 6,382sqm (GEA) of floorspace.
- 2.2.6 The southern and eastern external walls of the extended area would match the height of the existing pitched main warehouse building's roof at a

maximum height of 11.29m. The walls would be constructed of galvanised steel sheeting in a light grey colour (RAL 7038 – goosewing grey) to match the existing main warehouse building and minimise the visual impact of the building from Holyhead Road (B5070), which would be minimal due to the existing extensive tree cover and bund which surrounds the Kronospan Facility.

2.2.7 Immediately to the south of the proposed covered loading yard is the internal access road, which runs from Holyhead Road into the site towards the main office building. Visitor car parking and lorry parking is to the south of this road. The access road is tree lined on both sides. A new reception building would be erected with accompanying turnstiles for secure staff entry. A metal gate would also be erected to the east of the reception building for added security into the Facility.

2.2.8 To the east of the proposed covered loading yard is an area of landscaping made up of a vegetated bund and a flat area of grassland. The footpath entrance into the site runs through an area of flat grassland. To the west of the bund and the grassland is a substation and another bund which buffers the site from the Holyhead Road.

2.3 Proposed Site Operations

2.3.1 The Proposed Development would allow for the continued use as a loading yard but internalising this space. Forklift trucks would be working in the covered loading yard to load up Heavy Goods Vehicles (HGVs) with the products produced on site. There are no current restrictions on how this is done in the current loading yard in terms of hours of operation.

2.3.2 As discussed in the accompanying Design and Access Statement, the size of the proposed covered service yard reflects the height to which product can be safely and practically stacked, and the amount of floorspace that can allow for sufficient storage as to make a practical difference to operations at the manufacturing facility. The layout of the covered loading yard has also been designed to reflect the external space available to extend into outside of the main warehouse building, which would align to the existing most southerly building line.

- 2.3.3 There would be no increase in the number of HGVs. Instead of vehicles taking some products off-site to a warehouse and then bringing them back to the manufacturing site for distribution, they would take the same products directly to customers. This would reduce the number of vehicles arriving and leaving the Kronospan Facility.

2.4 Construction

- 2.4.1 Initially the existing building and structures on the site would need to be demolished and removed.
- 2.4.2 The covered loading yard building itself would consist of a steel portal frame and its cladding would be double skin with 100mm mineral insulation and inner perforated liner, in a light grey colour (RAL 7038 - goose wing grey) to match the existing main warehouse building.
- 2.4.3 Whilst the covered loading yard is under construction, the existing loading activities undertaken in the yard would be relocated to the back loading yard area which is located further east within the Kronospan Facility. The reception building would be moved to the north of the Kronoplus building.

3.0 NEED AND BENEFITS OF THE SCHEME

- 3.1.1 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. The manufacturing 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.
- 3.1.2 The Proposed Development is part of an ongoing development programme to deliver improvements at the site, improve the efficiency of the operations and to ensure the long-term economic viability of the manufacturing facility.
- 3.1.3 The recent developments at the Site (which are listed in Section 4.0 below) responded to a greater demand for products and the nature of customer demand has changed, which has made responding to customer needs at short notice more important. The facility can now offer a greater range of products than previously, and hence needs a more efficient loading practice on the Site itself, to ensure the product reaches Kronospan's customers efficiently.
- 3.1.4 There are several key benefits to the Proposal. There would be a reduction in noise to the east of the Site, particularly the residential properties on Maes Y Waun and Maes Y Ysgol. This is because the current activities would be internalised within a building which would feature 100mm insulation to both the roof and walls.
- 3.1.5 Another benefit of the internalised loading area would be to Kronospan employees, whereby current working conditions for Kronospan employees would be improved through the insulating properties of the proposed covered loading area, as they would no longer be exposed to the elements whilst loading products onto HGVs and whilst working in the press halls.
- 3.1.6 Kronospan is currently providing a valuable service to its customers, which it would like to maintain and improve. Currently, there is a risk of damage to the products during the loading process within the uncovered loading yard. Through storing and loading the products within a protected building, the

products would not be exposed to water damage or volatile temperatures and weather due to climate change, which would damage the products, thereby reducing the requirement to dispose of damaged goods or replace damaged items, thus streamlining the loading process.

3.2 Environmental Benefits

- 3.2.1 Over several years Kronospan has implemented projects aimed at further improving environmental conditions at the manufacturing site. The effects of the ongoing improvement projects in terms of landscape, visual, heritage, air quality, noise and transport have been assessed within the various applications submitted by Kronospan over the past few years.
- 3.2.2 The specific impacts of the Proposed Development are assessed within the accompanying documents. In terms of noise, the noise generated within the covered loading yard would be relatively minor as there would be no manufacturing undertaken within the building.
- 3.2.3 Whilst there would be some loss of vegetation during the construction phase, the Applicant would work with the Local Planning Authority to find a suitable place for tree planting and landscaping. This would result in an overall net gain in biodiversity.
- 3.2.4 The Proposed Development would also reduce product waste through protecting the product during the loading process, reducing the risk of water damage or exposure to volatile temperatures.

4.0 PLANNING HISTORY

4.1 Introduction

- 4.1.1 Prior to the 1970s, the site was greenfield agricultural land and included a farmhouse. The farmhouse still forms part of the offices of Kronospan, and the reception and related functions which would be within the building to be demolished would be relocated here. 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 6 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 developments over the last 10 years

Application Ref. No.	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	Approved - 07 May 2014

Application Ref. No.	Proposal	Decision
	storage area & associated infrastructure (substitution of planning permission code P/2012/0165)	
P/2014/0215	2.5m diameter by 7m high extension to existing 15m high abatement stack.	Approved 2 June 2014
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	Approved – 31 July 2017

Application Ref. No.	Proposal	Decision
	development of a new wood chip dryer and associated equipment.	
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	Planning Application for the development of an orientated strand board production facility	Granted on Appeal (against non-determination) – 9 October 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	Resolution to grant at Planning Committee (1 st November 2021) subject to signing of S.106 Legal Agreement

4.1.4 In conclusion, the planning history identifies that:

- The site has a long history of planning consents and applications for large industrial development.
- There have been a number of 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 proposed extension to the main warehouse building to create the covered loading yard would be located within the curtilage of the existing main warehouse building, on the site of the existing reception / office building. This is part of the existing built area of the Kronospan Facility.
- 5.1.2 The following sections summarise the findings of the detailed environmental assessments that are appended to this Planning Statement.

5.2 Landscape and Visual (including Heritage)

- 5.2.1 Appendix A contains a Landscape and Visual Impact Assessment (LVIA) which also includes an appraisal of the Proposed Development in respect of heritage. The assessment was undertaken by a Chartered Member of the Landscape Institute (CMLI). The LVIA follows best practice guidance set out in 'Guidelines for Landscape and Visual Impact Assessment' (3rd edition 2013, Landscape Institute and Institute of Environmental Management and Assessment), hereafter referred to as the GLVIA.
- 5.2.2 The accompanying Design and Access Statement summarises the LVIA and both documents should be referred to in order to understand how the Proposed Development would be appreciated from nearby viewpoints.
- 5.2.3 Proposed Development would be introduced into an existing large-scale industrial site that is an established influence upon the town of Chirk and the surrounding rural area.
- 5.2.4 Views of existing tall, bulky structures at the Kronospan site are commonplace within the study area and their presence is an established part of the character of the landscape. In comparison, the Proposed Development would be a much smaller structure, and would be well screened by other structures, and by retained tree cover to the east and south. Although the Proposal would be visible looking into the Kronospan Facility through the main entrance into the site, it would be mostly screened from Holyhead Road via the existing bund running along the eastern boundary of the Facility and existing trees.

- 5.2.5 The Proposed Development would be an unremarkable addition that is unlikely to be clearly visible from outside of the Kronospan site boundary, and which would result in little or no appreciable change to existing influence of the Kronospan site upon its surroundings. Neither the landscape effects nor the visual effects of the Proposed Development would be significant.

5.3 Arboriculture / Trees

- 5.3.1 Appendix B contains an Arboricultural Impact Assessment (AIA) assessing the impact of the Proposed Development on existing trees. A survey of the Site was undertaken in accordance with BS5837:2012 (Trees in Relation to Design, Demolition and Construction) in January 2022.
- 5.3.2 The Proposal would not lead to the felling of any trees currently within the application red line boundary of the Site. Existing trees nearby would be retained and can be protected during construction if deemed necessary.
- 5.3.3 It is anticipated that there would be planting of trees and wider site planting on land within the Applicant's control, which would be agreed with WCBC.
- 5.3.4 The Arboricultural Impact Assessment also includes a method statement to minimise potential damage to nearby retained trees.

5.4 Ecology

- 5.4.1 An Ecological Impact Assessment is provided in Appendix C. The Site does not form part of a statutory or non-statutory site of nature conservation value. There are five statutory designated sites within a 5km radius of the Site boundary, and three non-statutory sites within a 2km radius. This includes the Afon Dyfrdwy a Llyn Tegis / River Dee and Bala Lake SAC, Castell Y Waun A'l Barcdir / Chirk Castle and Parkland SSSI, and the Afon Dyfrdwy / River Dee SSSI. The Proposed Development would not directly impact any of these designated sites given the separation distance: the nearest statutory designated site is 1km away, and the nearest non-designated site is 300m to the west (Coed y Camlas / Canal Wood Wildlife Site).
- 5.4.2 The main habitats on the Site affected by the Proposed Development comprises hardstanding and modified grassland, which are of low value in

ecological terms and support limited species diversity. There are also limited opportunities to support breeding birds, with adjacent trees offering more nesting potential. No structures or trees were identified which have the potential to support roosting bats, and which would be impacted on by the Proposed Development. There were no invasive non-native species recorded on or adjacent to the Site.

- 5.4.3 Suitable mitigation and protection measures are proposed to ensure that the works are undertaken in such a way as to minimise impacts and to accord with relevant legislation. With these in place the impacts of the Proposed Development can be managed.
- 5.4.4 Overall, with planting around the Site and on land in the ownership of the applicant the Proposed Development can create a net benefit in terms of habitat and biodiversity.

5.5 Noise

- 5.5.1 A Noise Impact Assessment is provided in Appendix D. This assessment has been undertaken in accordance with appropriate standards and guidance and the approach agreed with the WCBC Environmental Health Officer with regards to the assessment of noise impacts from previous development at this manufacturing site.
- 5.5.2 The assessment has been undertaken to inform and guide the design of the development such that any likely noise impact on existing dwellings is minimised. Existing background noise monitoring data has been used along with contemporary site specific monitoring to determine the baseline noise conditions at nearby residential receptors.
- 5.5.3 Observations at the nearest residential properties indicate that noise from local and distant road traffic and noise from the existing industrial activities in the area form the general noise climate at the nearest receptors. The impact of cumulative developments at the manufacturing site has also been considered.
- 5.5.4 The Proposed Development would reduce noise levels at noise sensitive receptors in terms of existing loading activities as these would be carried out within the proposed covered loading area. The reduction from this noise

source at residential receptors located to the east of the Site would be between 3dB(A) and 7dB(A).

- 5.5.5 Whilst the Ysgol Y Waun Primary School was not included within the noise assessment, the internalisation of activities within the covered loading yard would not impact upon the school as there would be an overall noise reduction achieved from the Kronospan Facility.
- 5.5.6 Noise from road traffic would largely be unchanged.
- 5.5.7 The cladding proposed for the building is assessed as suitable, and the intended material is considered appropriate in terms of noise insulation. Any ventilation louvres within the walls should be acoustically treated so that the acoustic performance is similar to the cladding. Mobile reversing alarms on mobile plant can be designed to not be perceptible at the nearest sensitive receptors.
- 5.5.8 The overall impact would be acceptable, and within accepted standards. This includes when the noise generated is considered alongside cumulative impacts from other recent developments on the manufacturing site.

5.6 Drainage

- 5.6.1 As existing, the surface water from the entire installation with the exception of the PB Pre-production area, drains to two lagoons which are situated on the northern boundary of the Site.
- 5.6.2 There is a third lagoon which takes surface water from the log yard. Currently, the log yard partially consists of hardstanding, with some soft landscaping. The third lagoon has been sized to accommodate all surface waters in the event that the log yard were to become entirely hardstanding, which the Proposed Development would not result in. The Site also has provision within the operation of the lagoons to deal with heavy rainfall events.
- 5.6.3 Hence, the existing provisions are considered adequate for both the existing and future scenarios.

5.7 Other Matters

- 5.7.1 There would not be a material change to the number of employees or the volume of product produced at the Site, and so the Proposed Development would not generate air quality concerns: the operation would be internalised, and would reduce the potential for fugitive dust emissions as a result. The proposed reduction in the number of vehicles would logically have a positive impact on the road network and air quality.

6.0 CUMULATIVE EFFECT

6.1.1 A number of planning permissions have been granted in recent years for developments which form part of the ongoing investment at the Site. This includes:

- Logyard silos and RCT offloading and grading facilities (Operational)
- Melamine facing press hall / building (Operational)
- Wood Chip Preparation Building and WESP Chip Dryer (Operational)
- Log Offloading Facility and Flaker Facility (Linked to OSB) and Refurbishment of the Existing Chipper (Chipper refurbishment is complete and operational);
- Raw Board Storage (Not yet commenced);
- Oriented Strand Board (OSB) Facility (Not yet commenced); and
- North-East Warehouse Building (Not yet commenced).

6.1.2 Most of the above developments form part of the Kronospan Vision 2020 strategy and the locations of these proposals are shown on Figure 2.

6.1.3 As some of these developments have / would become operational at around the same time, it is considered important to take into account the cumulative effects of the developments alongside the Proposed Development.

6.1.4 As discussed above (and also reiterated below in the context of relevant planning policy) there would not be a detrimental impact in terms of landscape and heritage. The cumulative effect of the applications include an overall reduction in the noise resulting from the manufacturing site operations, less potential for fugitive dust emissions, and some reduction in vehicle trips.

6.1.5 From an economic and social perspective, it has been highlighted on a number of occasions that the implementation of the Kronospan Vision 2020, has enabled diversification of the business and increase the productivity and efficiency of the site, whilst ensuring no overall job losses. The Proposed Development does not form part of the Kronospan Vision 2020 but compliments it and would improve operational efficiency.

- 6.1.6 Based on the environmental assessments which accompany the Proposal the conclusion is that there would be no significant adverse cumulative effects would arise from the construction and operation of the covered loading yard. There is a potential benefit to be realised in terms of noise and to a lesser extent air quality.

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

7.2.1 Section 38(6) of the Planning and Compulsory Purchase Act (September 2004) and paragraph 1.18 of Planning Policy Wales (February 2021) 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 Wrexham Unitary Development Plan 1996-2011 (UDP), which was adopted on the 14th February 2005.

7.2.3 The key environmental considerations in relation to the Proposed Development at the existing Kronospan site are noise, visual impact (including heritage), ecology and drainage. The relevant policies of the UDP in relation to these matters, as well as the general principle of the development, have been identified as follows:

- Policy PS1: Strategic Policy (The Broad Location of Development)
- Policy PS2: Strategic Policy (The Broad Location of Development)
- Policy PS3: Strategic Policy (The Broad Location of Development)
- Policy PS4: Strategic Policy (The Broad Location of Development)
- Policy GDP1: Development Objectives
- Policy EC4: Hedgerows, Trees and Woodland

- Policy EC6: Biodiversity Conservation
- Policy EC7: Conservation Areas
- Policy EC13: Surface Water Run-off
- Policy E4: Employment Development (of un-annotated land) within Settlements

Material Considerations

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

The Emerging Development Plan

- Wrexham Local Development Plan (2013 - 2028) - Deposit Plan (March 2018)

Other National, Regional and Local Planning Considerations

- Planning Policy Wales Edition 11 (February 2021);
- Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009)
- Technical Advice Note (TAN) 11: Noise (1997)
- Technical Advice Note (TAN) 12: Design (2016)
- Technical Advice Note (TAN) 15: Development and Flood Risk (2004)
- Technical Advice Note (TAN) 23: Economic Development (2014);
- Technical Advice Note (TAN) 24: The Historic Environment (2017)
- Future Wales: The National Plan 2040 (2020);
- The following Wrexham Council Local Planning Guidance Notes:
 - Local Planning Guidance Note No. 6 – Access to and Use of Buildings
 - Local Planning Guidance Note No. 17 – Trees and Development
 - Local Planning Guidance Note No. 26 – Landscape and Industrial Development
 - Local Planning Guidance Note No. 30 – Design
 - Local Planning Guidance Note No. 32 – Biodiversity and Development

- Local Planning Guidance Note No. 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 and other material considerations that are of relevance to the proposal. 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.

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

- 7.3.2 The Wrexham Unitary Development Plan (UDP) was adopted in February 2005 and was originally scheduled to cover the period to 2011. Its primary functions are to set out planning policies and to provide a basis for decisions on planning applications and to make proposals for development and the use of land. There are several strategic policies of relevance to the Proposal.

Policy PS1 and Policy PS2: Strategic Policies (The Broad Location of Development)

- 7.3.3 Policies PS1 and PS2 are strategic policies which aim to ensure that new development for housing, employment and community services will be directed to within defined settlement limits/employment areas and that the countryside, landscape/townscape character, open space, or the quality of the natural environment are not detrimentally affected by development.
- 7.3.4 The Kronospan site comprises a number of existing large industrial process buildings including air emissions stacks, storage areas for raw materials, warehouse buildings for manufactured products, offices and car parking. The Proposed Development would be located within the existing Kronospan Facility, which is within the Chirk settlement boundary as defined on the Proposals Map which supports the UDP. It would also be towards the

south-eastern side of the Site. The Green Barrier and Special Landscape Area designations are to the west, in excess of 300m from where the covered loading yard would be.

- 7.3.5 The Proposed Development would not detrimentally affect the character of the local area or the quality of the natural environment.
- 7.3.6 The overall outcome of the project at the manufacturing site would be no impact in terms of noise, negligible impacts on the historic environment, and no significant effects in terms of landscape and visual impacts, trees or ecology. For the aforementioned reasons, the Proposal accords with Policies PS1 and PS2.

Policy PS3: Strategic Policy (The Broad Location of Development)

- 7.3.7 Policy PS3 aims to ensure that development is directed at previously developed brownfield sites rather than greenfield land, wherever possible.
- 7.3.8 Planning Policy Wales (PPW) includes a definition of previously developed (or brownfield) land (page 37). It is:

“land...which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure. The curtilage...of the development is included...”

- 7.3.9 The curtilage is further defined as:

“The curtilage is defined as the area of land attached to a building. All of the land within the curtilage of the site will also be defined as previously-developed. However this does not mean that the whole area of the curtilage should therefore be redeveloped...”

- 7.3.10 Based on these definitions the Proposed Development would be located on previously developed land and within the curtilage of the existing main warehouse building. The existing reception building on the Site would be demolished. The majority of the rest of the Application Site consists of hardstanding / road surface, with landscaping, which would also be removed.

- 7.3.11 Therefore, the Proposed Development would be located on previously developed land and accords with Policy PS3.

Policy PS4: Strategic Policy (The Broad Location of Development)

- 7.3.12 Policy PS4 aims to ensure that development maintains the existing settlement pattern and character and is integrated in the existing transport network.
- 7.3.13 The Proposed Development would maintain the existing settlement pattern and character. It would be within the existing Kronospan Facility, which is clearly defined, with the eastern boundary being marked by the B5070 Holyhead Road. The existing facility is a collection of buildings with large footprints which reflect their industrial and ancillary storage use.
- 7.3.14 The Proposed Development would not have a material impact on the existing transport network. The covered loading yard would be used for storing materials which are produced on site, and the Proposal would not increase production. Therefore, there would be no additional traffic movements generated compared to the current situation.
- 7.3.15 The manufacturing site represents a sustainable location for a commercial development, being located 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 employment, except for potentially consolidating a small number of roles.

Policy GDP1: Development Objectives

- 7.3.16 Policy GDP1 sets out eleven objectives for all new development. The following five objectives are considered to be particularly relevant to the Proposal:
- *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.*

7.3.17 The Proposed Development would be for a substantial building, particularly in terms of footprint. However, it would always be viewed in the context of the existing large buildings which collectively form a large industrial facility. Views would be overwhelmingly from within the manufacturing facility itself. The Design and Access Statement which accompanies this planning application appraises the Proposed Development in detail. Although some of the existing landscaping would be removed it would be replaced by landscaping of greater value in another location following the agreement of WBCB.

7.3.18 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.

7.3.19 The main entrance and pedestrian entrance route would remain open to the public to access the Facility, with the existing signage indicating where the

lorry car park is and where visitors should go to sign-in at the Facility. As the existing reception / office building is proposed to be demolished as part of the Proposal these uses would be relocated to the original farmhouse building further along the access route into the Facility. Staff entrance points into the main manufacturing part of the Facility would still be secured inhibiting access by members of the public.

- 7.3.20 As described within Section 2, the materials used in the construction of the Proposed Development would be exactly the same as the existing built main warehouse building within the Kronospan Facility. The walls and roof would be clad with galvanised steel sheeting. The proposed external cladding to the east and north sides to be pale grey in colour (RAL 7038 goosewing grey), which would allow the building to blend-in against the existing warehouse building when viewed from within the Kronospan Facility and blend in to the backdrop of the trees and vegetation of the bund when viewed from Holyhead Road. Accordingly, the Proposed Development would accord with the character of the site and surroundings. The Design and Access Statement provides a more detailed evaluation of the design and how it responds to its context.
- 7.3.21 The public transport links have been referred to above and being within the settlement boundary of Chirk inherently means that the manufacturing site is well located to allow people to walk and cycle to and from it.
- 7.3.22 The Proposed Development would replace the current open loading area with a covered loading area, thus reducing the potential for fugitive dust emissions.
- 7.3.23 The impact on nature conservation has been considered carefully through the Ecological Assessment and Arboricultural Assessment appended to this report, and the proposed removal of the existing landscaping on the Site have been demonstrated to be acceptable within the appended documents. The location of the replacement landscaping would be agreed with the local planning authority.
- 7.3.24 Drainage has been considered as part of the Proposal, and a drainage scheme exists which is demonstrated to be adequate to cater for the

existing manufacturing site and with the addition of the Proposed Development.

- 7.3.25 Kronospan was the 9th largest manufacturer in Wales in 2020¹ 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.
- 7.3.26 In light of the foregoing the Proposed Development is considered to accord with Policy GDP1.

Policy EC6: Biodiversity Conservation

- 7.3.27 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.
- 7.3.28 The Chirk Castle and Parkland Site of Special Scientific Interest is located approximately 500 metres west of the Proposed Development site. The development is proposed within the existing boundary of the Kronospan Facility on an area currently consisting predominantly of hardstanding with a smaller area of soft landscaping, all of which is considered to be previously development land as defined by PPW. The distance to the SSSI is substantial and sufficient to ensure that there would be no direct effects on it or any other designated site.
- 7.3.29 As noted above, it can be concluded that the Proposed Development would not result in any harm, directly or indirectly, to sites of biodiversity interest.

¹ 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

In light of the foregoing, there is not considered to be any conflict between the Proposed Development and Policy EC6.

Policy EC7: Conservation Areas

- 7.3.30 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.
- 7.3.31 The LVIA provides an assessment of the impact of the Proposed Development on heritage assets. Chirk Conservation Area lies approximately 500 metres to the south of the Proposed Development. No development is proposed within the conservation area and the Proposed Development would be partially screened from view by landscaping, and where visible it would be viewed alongside the existing warehouse / industrial buildings.
- 7.3.32 On this basis it can be concluded that the Proposed Development would not be contrary to Policy EC7.

Policy EC4: Hedgerows, Trees and Woodland

- 7.3.33 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.
- 7.3.34 Off-site planting would be agreed with the local planning authority through this application and result in a greater quantity and quality of habitat which would be managed going forward. The impact on nearby existing trees has been shown to be acceptable within the accompanying Arboricultural Impact Assessment.

Policy EC13: Surface Water Run-Off

- 7.3.35 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. The drainage arrangements would be

demonstrated as part of a Sustainable Drainage Approval Board (SAB) application.

Policy E4: Employment Development (of un-annotated land) within Settlements

- 7.3.36 This policy confirms that employment development proposals on unannotated land within settlements will be permitted provided that the Proposal accords with Policy GDP1.
- 7.3.37 The Kronospan site is not allocated² for employment within the UDP but has been occupied by the manufacturing facility, and thus in employment use, for over forty years. The application site is within the settlement limits of Chirk as identified on UDP Proposal Map 4: Inset 7. Additionally, the Proposal has been found to be in accordance with Policy GDP1 and therefore the Proposal fulfils the requirements of Policy E4.

Material Planning Considerations – The Emerging Development Plan

Wrexham Local Development Plan (2013 - 2028) - Deposit Plan (March 2018)

- 7.3.38 Wrexham County Borough Council is in the process of preparing a new Local Development Plan (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.
- 7.3.39 The Deposit Plan is the second formal publication of the evolving LDP document. In addition to identifying where and how much new development will take place in the County Borough, the LDP identifies those areas which need to be protected for their environmental qualities.
- 7.3.40 The Plan was submitted to the Welsh Government and the Planning Inspectorate on 30th November 2018, but it was only officially acknowledged

² The terminology is slightly different, but “un-annotated” and “unallocated” have been interpreted to refer to land and buildings in employment use which are not specifically highlighted on the Proposals Map.

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 restricted to housing and gypsy and traveller accommodation site assessment and selection process.

7.3.41 The most recent correspondence with the Planning Inspectorate has been 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.

7.3.42 To conclude, the emerging Development Plan is at an advanced stage of its preparation. Given that the policies which remain under discussion relate to housing, due weight should be attributed to the remaining policies in the emerging plan in the determination of this planning application. The relevant policies and objectives are considered under the headings below.

Economy and Employment

7.3.43 Strategic Objective SO2 seeks to:

"Support a vibrant, diverse and competitive local economy that provides a range of job opportunities to enable new and existing businesses to grow in Wrexham County Borough with strategic growth in Wrexham Town and Wrexham Industrial Estate".

7.3.44 This objective is supported by several policies including Strategic Policy SP2 *Location of Development*, Strategic Policy SP9 *Economic Growth, Employment and Enterprise* and Policy EM1 *Protection of Existing Employment Land*.

7.3.45 Policy SP2 requires that new development is directed to the defined settlement limits and employment areas as identified on the Proposals Map. Policy SP9 safeguards existing important industrial estates which are

“essential to meeting the future economic growth of the County, which ensures a range and choice of sites co-located with housing in both urban and rural settlements”. This seeks to facilitate a level of growth which allows opportunities to deliver approximately 4,200 jobs in the County Borough over the Plan period.

- 7.3.46 Policy EM1 identifies 25 existing employment areas which will be protected for B Use Class employment generating uses, and the Chirk Industrial Estate, Chirk and Canal Wood Industrial Estate, Chirk (hereafter referred to as the Chirk Industrial Estate) is one of these areas.
- 7.3.47 The draft Proposals Map shows the extent of the Chirk Industrial Estate employment area alongside the settlement boundary for Chirk, with both being mutually exclusive but adjoining. This is in contrast to the UDP which did not define a specific area for employment and instead had a settlement boundary which included the employment area alongside the rest of Chirk without differentiation.
- 7.3.48 Therefore, adopted policy PS1 and draft policy SP2 are similar in their approach to directing development to the defined area of Chirk. However, they differ in that draft policy SP2 identifies settlement limits as distinct from employment areas.
- 7.3.49 The draft Proposals Map shows the boundary of the Chirk Industrial Estate, and includes the Facility (and hence the Site) within it.
- 7.3.50 The introduction of this specific allocation is considered to add support for the Proposed Development. Although draft policy EM1 is about protecting existing uses, policy SP9 identifies the safeguarded sites as being (with added emphasis) *“essential to meeting the future economic growth”*, and so the proposed approach within the LDP is more than simply maintaining the status quo. It seeks additional development on top of protecting what is already there.
- 7.3.51 The Proposed Development is part of a programme of continual improvement of the operational efficiency of the site which will allow Kronospan to compete effectively and maintain its current levels of employment.

- 7.3.52 The policy and objectives centred on Economy and Employment therefore add weight to the policy support for the Proposed Development.

Natural Environment

- 7.3.53 Strategic Objective SO9 seeks to: *“Protect, manage and enhance the natural and historic environment and landscapes”*.
- 7.3.54 Policy SP15 *Natural Environment* requires development to *“protect, conserve and enhance the natural environment”*.
- 7.3.55 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.
- 7.3.56 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.
- 7.3.57 As discussed above the Proposed Development would not result in the felling of any trees, nor would there be any impact on nearby existing trees. The Applicant is committed to the provision of additional tree planting on land within their control, and the location and detail of which would be agreed with the local planning authority ahead of planting.
- 7.3.58 The supporting text to the policy was amended to *“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 allocation of the site for employment purposes is material to this, and the Proposed Development responds both to the

employment aims of the LDP whilst also respecting and responding to the natural environment.

- 7.3.59 Therefore, the Proposed Development is in accordance with policies and objectives related to the natural environment.

Historic and Cultural Environment

- 7.3.60 Strategic Policy 15 *Historic and Cultural Environment* confirms that development will only be supported where it conserves, protects and enhances cultural and heritage assets of the County Borough and, where appropriate, their settings.

- 7.3.61 The Kronospan Facility is an established part of the context of the south-eastern edge of the AONB. Policy NE4: *Area of Outstanding Natural Beauty* sets out that within the AONB development will only be supported where it conserves or enhances the natural beauty of the area and its setting. Criteria that development must meet in relation to the AONB are also set out in this policy.

- 7.3.62 The LVIA completed to support this application is discussed above. It also considered the impact on heritage assets. The LVIA concludes that the additional presence of the Proposed Development would be unremarkable and would result in little or no appreciable change to existing influence of the Kronospan Facility upon its surroundings. Neither the landscape effects nor the visual effects of the Proposed Development would be significant.

- 7.3.63 Therefore, the Proposed Development is in accordance with policies and objectives related to the historic and cultural environment.

Development Management

- 7.3.64 Policy DM1: *Development Management Considerations* sets out 12 general criteria that development must fulfil, and it is considered that the Proposed Development satisfies all these requirements. This includes the need for development proposals to accord with or enhance local character, distinctiveness and the appearance of the site. Developments should also not have an unacceptable effect on the amenity of occupiers and should not increase the risk of flooding.

- 7.3.65 The material considerations which are mentioned in the policy are referred to in the adopted UDP and have been considered and found to be acceptable in this Planning Statement, and the other documents which accompany the planning application. Material Planning Considerations – Other National, Regional and Local Planning Considerations.

Planning Policy Wales (Edition 11, February 2021)

- 7.3.66 Planning Policy Wales (PPW), 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. PPW 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.
- 7.3.67 The PPW 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”.
- 7.3.68 The following chapters of PPW 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
- 7.3.69 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.
- 7.3.70 The relevant advice within these chapters of PPW is outlined below and considered in the context of the Proposed Development.
- 7.3.71 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 the PPW include Environmental Sustainability, Community Safety, Character, Access and Movement.

- 7.3.72 Chapter 3 is crosscutting and applies to a number of aspects of the development described and assessed above. The documents which accompany this planning application conclude that the Proposed Development would not give rise to any significant adverse effects. It is clear that the Proposed Development would contribute to sustaining the valuable economic contribution that the business makes to the local and national economy.
- 7.3.73 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.
- 7.3.74 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.
- 7.3.75 As noted above and discussed further in the next section of the report, the Proposed Development provides significant economic benefits to Wrexham and Wales and therefore makes a positive contribution to this national policy goal.
- 7.3.76 Chapter 6 considers '*Distinctive and Natural Places*', which includes the environmental and cultural components of placemaking. The PPW 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.

- 7.3.77 The Proposed Development has been shown to respect both the historic and natural environment. In terms of the latter, off-site tree planting and habitat creation would be agreed with the local planning authority through this application and result in a greater quantity and quality of habitat which would be managed going forward.
- 7.3.78 Based on the above it is clear 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 Proposal.

Conclusions

- 7.3.79 The Proposed Development would contribute to each of the national policies outlined above and it has been established that the Proposal represent Sustainable Development.
- 7.3.80 The Proposed Development would result in operational benefits, enabling Kronospan to operate more efficiently. The Proposed Development would therefore help secure the ongoing success of this important local employer.
- 7.3.81 The overall outcome of the Proposed Development would be to provide no impact in terms of noise, negligible impacts in terms of historic environment, no significant effects in terms of landscape and visual impacts and enable Kronospan to secure improvements in efficiency and current employment levels.
- 7.3.82 On the basis of the above it is considered that the Proposed Development is in accordance with all relevant national planning policies.

Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009)

- 7.3.83 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.
- 7.3.84 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.

7.3.85 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.

7.3.86 The submission includes an assessment on the impact of the Proposal on nature conservation, which concludes that the impact would be acceptable.

Technical Advice Note (TAN) 11: Noise (2016)

7.3.87 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.

7.3.88 TAN 11 also advises on measures to mitigate the impact of noise, which fall into three categories: engineering, layout-out, and administrative.

7.3.89 The Proposed Development would generate limited noise with activities taking place within the building which has limited openings. The Proposed Development would also internalise within the proposed building some of the current activities on this part of the site.

Technical Advice Note (TAN) 12: Design (2016)

7.3.90 TAN 12 provides advice in respect of delivering good sustainable design. The planning application is accompanied by a Design and Access Statement which describes the approach undertaken to the design and considers a number of matters including access and movement, character, layout and appearance.

7.3.91 Section 3.0 of the TAN describes the design process. At paragraph 3.2 it states that *“appreciation of the site’s context, and the development of a vision and agreed design objectives must be established and remain central to the evolutionary [design] process.”*

7.3.92 The Proposed Development is a functional development that will be used for the loading of products produced on the Kronospan site onto HGVs. As

well as ensuring that the building meets its functional requirements to enable it to fulfil its role in the site's manufacturing process, the principal design driver is for the building to fit into its local context i.e. an industrial site, and to reduce the visual impact of the building from any locations outside the site from where it can be seen.

7.3.93 The TAN highlights how appraising the local context is a vital early step in the design process. At paragraph 4.5 it notes that *"the local context will highlight distinctive patterns of development or landscape where the intention will be to sustain character"*. In terms of character the TAN states at page 19 that the design should respond to:

- landscapes and townscape, culture and biodiversity;
- locally distinctive patterns and forms of development;
- existing buildings, infrastructure, urban/rural landscape and public art;
- clear boundaries and established building lines;
- appropriateness of uses and the mix of uses and densities; and
- easily recognisable and understood features and landmarks,

7.3.94 The Proposed Development would be located in the southern part of the Kronospan Facility adjoining to the long established, large main warehouse building which is of the same height to the Proposal. The Kronospan Facility forms an established landmark locally and whilst undoubtedly its character is very different from the rest of Chirk, it has become a valid and distinctive component of the local 'sense of place'. This influence is documented within the adopted Chirk Conservation Area Assessment and Management Plan (2014).

7.3.95 The Proposed Development would be consistent in height with the surrounding structures. As set out in the Design and Access Statement, the Proposed Development would be clad in pale grey cladding (RAL 7038 goosewing grey) on the east and south sides (subject to the agreement of WCBC) which has been selected to reduce the visual impact of the facility.

7.3.96 The Chirk site is an existing large-scale industrial site that has an established influence upon the town of Chirk and the surrounding rural area. Views of existing tall, bulky structures at the Kronospan site are commonplace within the study area and their presence is an established

part of the character of the landscape. The Proposed Development would be lower than many existing buildings and structures within the Kronospan Facility and so would not be prominent against the sky.

- 7.3.97 TAN 12 requires that in areas recognised for their landscape, townscape, architectural, archaeological and/or historic value, such as National Parks, Areas of Outstanding Natural Beauty, World Heritage Sites and conservation areas, the objective of sustaining character is particularly important and context appraisals should reflect this. The Heritage Desk-Based Assessment provided as part of this planning application considers heritage matters. The assessment concludes that the additional presence of the Proposed Development would be unremarkable and would result in little appreciable change to the existing influence of the Kronospan Facility upon the surrounding area, including upon the designation of the AONB, Pontcysyllte Aqueduct and Canal WHS and Scheduled Monument, Chirk Castle Historic Park & Garden and Chirk Conservation Area.

Technical Advice Note (TAN) 15: Development and Flood Risk (2004)

- 7.3.98 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.
- 7.3.99 The surface water runoff would be managed and demonstrated as part of a SAB application.

Technical Advice Note (TAN) 23: Economic Development (2014)

- 7.3.100 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.
- 7.3.101 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”*.

7.3.102 As noted above, the Proposed Development is intended to add operational efficiency to the existing plant and follows on from the successful Kronospan Vision 2020.

Technical Advice Note (TAN) 24: The Historic Environment (2017)

7.3.103 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.

7.3.104 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. The Heritage Desk-Based Assessment considers the impact on the nearby heritage assets. Given that the Proposed Development would be an extension to the existing main warehouse building to create a covered loading yard on to the south of the site, furthest from the most sensitive heritage assets, and that the height of the Proposed Development would be lower than the taller elements on the site, the impact would be negligible.

Future Wales: The National Plan 2040 (2020)

7.3.105 The National Plan is a twenty year plan for the sustainable development of Wales. It contains a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities in Wales.

7.3.106 The National Plan contains strategic policies. Policy 1 identifies Wrexham as being within a National Growth Area.

7.3.107 There are separate policies for the regions of Wales, and the Site falls within the North region. There is a requirement for a Strategic Development

Plan to be created to consider regional planning issues, but this does not yet exist.

- 7.3.108 Policy 20 is specific to the National Growth Area which extends across Wrexham and Deeside, identifying that this will be the main focus of growth and investment within the North region.
- 7.3.109 The Proposed Development would represent growth and investment and so contributes to the continued economic success of the Kronospan Facility, which is in the part of the North region where the main focus of economic development is located. The Proposed Development would make an important contribution to meeting the aims of the Spatial Plan.

Local Planning Guidance Notes

- 7.3.110 Wrexham County Borough Council 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 and some have been identified to be of relevance to the Proposal, these documents are considered with regard to the Proposed Development 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 No. 7 – Landscape and Development

- 7.3.111 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.
- 7.3.112 There are limited opportunities to provide landscaping immediate around the Site but planting elsewhere in the Facility and the surrounding land is being considered.

Local Planning Guidance Note No. 17 – Trees and Development

- 7.3.113 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.
- 7.3.114 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.
- 7.3.115 The level of information provided is considered sufficient as there are no existing trees within the application red line boundary nor would there be impacts on nearby existing trees.

Local Planning Guidance Note No. 26 – Landscape and Industrial Development

- 7.3.116 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.
- 7.3.117 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.

7.3.118 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 No. 32 – Biodiversity and Development

7.3.119 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.

7.3.120 The Ecological Assessment which supports this planning application is based on primary and secondary information to identify the potential for species on the Site. The removal of part of the landscaping has been shown not to cause material harm. Off-site mitigation would be agreed with the local planning authority through this application and result in a greater quantity and quality of habitat which would be managed going forward.

Local Planning Guidance Note No. 33 – Pontcysyllte Aqueduct & Canal World Heritage Site

7.3.121 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.

7.3.122 The LVIA which accompanies this planning application demonstrates the visibility of the Proposed Development would be minimal. It would be situated on a part of the Site which is furthest from the WHS and coupled

with the height of the proposed warehouse it is not considered to have a material impact on it.

7.3.123 It is concluded that the visual extent of the Kronospan site would not change significantly, nor would its influence upon the character of the WHS.

7.3.124 On this basis it is concluded that the Proposed Development would not give rise to any impact upon the heritage significance of the Pontcysyllte Aqueduct and Canal World Heritage Site, its buildings, structures and landscape. As such the Proposed Development would meet the stated aim of Local Planning Guidance Note No. 33.

Wrexham Tree and Woodland Strategy 2016 – 2026

7.3.125 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.

7.3.126 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.

7.3.127 The Proposed Development has been shown to be responsive to its context. Off-site planting would be agreed with the local planning authority through this application and result in a greater quantity and quality of habitat which would be managed going forward. The Proposal would accord with the principles of the Tree and Woodland Strategy.

8.0 CONCLUSION

- 8.1.1 The Proposed Development follows on from a substantial development programme to ensure the long term economic viability of the manufacturing facility and deliver environmental improvements. The proposed covered loading yard would deliver efficiencies in how the Kronospan Facility operates through the internalising the product loading area, which ultimately reduces risk of damage to Kronospan products, thus reducing the need to dispose of damaged goods, which results in a more streamlined operation on site.
- 8.1.2 The Proposed Development would help sustain the existing business which provides employment to circa 600 staff and in turn the circa 6,000 plus people in the UK indirectly supported by its operations. The Proposed Development would enable the existing jobs to be sustained.
- 8.1.3 The existing reception and office building on site would need to be demolished along with the removal of the existing landscaping. However, off-site mitigation through habitat creation and tree planting would be agreed with the local planning authority through this application and result in a greater quantity and quality of habitat which would be managed going forward.
- 8.1.4 The Proposal would result in a reduction in noise to the east of the Site, particularly the residential properties on Maes Y Waun and Maes Y Ysgol. This is because the current activities would be internalised within a building which would feature 100mm insulation to both the roof and walls. This internalisation also has the potential to reduce fugitive dust arisings from the Site.
- 8.1.5 An assessment of the Proposal against the relevant planning policy and guidance has demonstrated that the Proposed Development meets the test of Section 38(6) of the Planning and Compulsory Purchase Act and paragraph 1.18 of PPW as it fully complies with the provisions of the statutory Development Plan. 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.

8.1.6 In addition, a comprehensive assessment of relevant material considerations has not revealed any justification for determining this application other than in accordance with the development plan. In fact, the Proposal have also been found to strongly accord with, and be supported by, a range of material planning considerations. Accordingly, planning permission should be granted without delay.