



Town and Country Planning Act

Appeal by Gladman Developments Ltd.

Dennis Ruabon, Hafod Tileries, Johnstown

LPA REF: P/2013/0545

PROOF OF EVIDENCE
in relation to Landscape and Visual Matters

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1.0 INTRODUCTION

- 1.1 My name is Elizabeth Anne Fry. I have a degree, BA (Joint Hons), in Fine Art and History of Art from De Montfort University and a Master's degree in Landscape Design from Sheffield University. I am a Chartered Member of the Landscape Institute and an Associate Director of FPCR Environment and Design Ltd; a multi-disciplinary design partnership with over 55 years' experience of landscape, ecology, urban design, masterplanning, arboriculture and environmental assessment. The Practice is a member of the Landscape Institute, the Institute of Environmental Assessment and Management and the Urban Design Group. I have been an Associate/Associate Director of the Practice for almost 11 years.
- 1.2 I have over 15 years' experience of landscape and development projects from initial conceptual design through to final completion and long-term aftercare. I am experienced in a range of landscape and environmental schemes involving constraints analysis, environmental assessment and detailed landscape design. I have advised on landscape and visual matters for residential development schemes and have also completed several Reserved Matters Applications. I am currently taking the first phase of a large (4250 new homes, 21ha employment) sustainable urban extension (west of Leicester) forward to detailed design and subsequent implementation.
- 1.3 FPCR has received numerous design awards over the years, including a Civic Trust Partnership Award for "Conkers", the National Forest Discovery Centre, in recognition of its contribution to the regeneration of the former Leicestershire Coalfield. We have prepared numerous Design and Access Statements as well as Design Codes in support of masterplanning applications, together with the accompanying Environmental Statements where these have been required.
- 1.4 The practice acts as a consultant to government bodies such as the Homes and Communities Agency, Natural England, English Heritage and the Environment Agency and I serve on the East Midlands Design Review Panel (OPUN) which fulfils a similar role to that of CABI, assessing new development proposals within the region. FPCR also acts as consultant to many local authorities across the United Kingdom. I led the team which prepared the Landscape Character Assessment, Sensitivity and Capacity Study for North East Lincolnshire which forms part of the evidence base for the borough's New Local Plan.
- 1.5 FPCR has been involved with the project since April 2010 when we were approached by Gladman Developments Ltd. to advise on landscape and visual matters as well as ecology and arboriculture. Initial work involved desk study and field analysis to determine the potential for residential development within the area. However, I was not involved in the project at this early stage.
- 1.6 The evidence which I have prepared and provide for this appeal reference is true and has been prepared and is given in accordance with guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

2.0 BACKGROUND AND CONTEXT

- 2.1 FPCR were appointed in April 2010 initially to undertake a landscape and visual review of the area, for Gladman Developments. Our clients were keen from the outset to understand the potential landscape impact of development in this general vicinity.
- 2.2 The Practice also prepared the Development Framework Plan, Illustrative Masterplan and supporting Design and Access Statement (DAS) for the development proposals. We worked very closely with other members of the design and environment team in order to prepare a scheme which evolved in response to the constraints and opportunities presented by the site, including its landscape context. The objective was to create a place to live which minimises potential environmental disruption whilst maximising benefits to the wider community. The process by which the Masterplan was prepared was therefore an iterative one, taking full account of the respective inputs from the Applicant's retained experts.
- 2.3 An outline planning application, with all matters reserved except access, was submitted to Wrexham County Borough Council (WCBC) on 1st August 2013 proposing the creation of a mixed use development for up to 300 new homes, employment and a local store together with public open space and a great crested newt reserve ("the Proposed Development") on a site totalling 17.34 hectares.
- 2.4 The application was accompanied by a comprehensive suite of supporting information which encompassed all the base line environmental studies carried out by the team. All the baseline studies and analysis was utilised to inform a fully co-ordinated Illustrative Masterplan and accompanying Design and Access Statement (DAS) that were submitted with the outline planning application. The Proposed Development did not require Environmental Impact Assessment.
- 2.5 The application was refused on 16th June 2015 and an appeal was submitted by Gladman Developments Ltd. The decision notice contained no specific landscape reason for refusal. Furthermore, no specific landscape comments were received during the application period and the Delegated Officer's Report (CD5.1) does not include a section on landscape. Under other sections it notes:-
- "The residential development of this land would be materially detrimental to the landscape and would fail to accord with the character of the site or make a positive contribution to the appearance of the nearby locality."*
- 2.6 The report concludes:-
- "The development would appear isolated and out of character with the countryside location..."*
- 2.7 Although there is no specific landscape objection, FPCR were asked to prepare landscape evidence for the appeal.
- 2.8 I have been involved with the project since April 2012, and carried out the Landscape and Visual Impact Assessment which accompanied the application. The submitted LVIA (CD1.6) followed a methodology based on Landscape Institute guidance that has since been superseded, therefore I have re-appraised the potential effects upon both landscape and visual resources using the methodological approach set out in the latest Landscape Institute Guidelines (GLVIA3, 2013). The updated methodology is set out at Appendix 1 of this Proof of Evidence while the criteria

adopted for the appraisal is included at Appendix 2. The updated likely landscape and visual effects of the Proposed Development is tabulated at Appendix 3 and 4.

2.9 Additional information was prepared and submitted to WCBC during the determination period, this included:-

- Two illustrative cross sections through the Proposed Development to demonstrate the required minimum distance of 30m between the pylons/ pylon corridor and housing development; (in response to an objection from National Grid; since removed) included at Appendix 5;4
- An addendum to the Design and Access Statement to consider adjacent land uses north of the Proposed Development, included at Appendix 6;
- The updated Development Framework Plan and Illustrative Masterplan (drawings 4355-P-04 J, 4355-P-05 H), included at Appendix 7 and 8;
- A sketch to illustrate the Hafod Road frontage, included at Appendix 9.

2.10 Taken together with the Design and Access Statement the Development Framework Plan and Illustrative Masterplan set out the components and parameters for the Proposed Development. The principles set out within the Design and Access Statement and shown on the plans can be secured by way of an appropriately worded planning condition.

3.0 THE SCOPE OF EVIDENCE

3.1 There is only a single reason for refusal which reads as follows:-

“By virtue of its unsustainable location outside of and divorced from any settlement limit as defined in the Wrexham Unitary Development Plan, the development would not represent a logical extension to the settlement limit and would appear isolated in the rural landscape. The development would not maintain the existing settlement pattern or encourage alternative means of travel to the car and would not accord with the character and appearance of the locality. The development therefore conflicts with Policies PS1, PS2, PS4, GDP1 and H5 of the Wrexham Unitary Development Plan.”

3.2 It should be noted that this does not include a specific landscape reason for refusal which is consistent with the content of the Delegated Officer's Report.

3.3 In my evidence I will focus on the landscape character and appearance of the area as raised in the Decision Notice. My evidence will outline the carefully considered approach which has been adopted by the client, I will address government design criteria set out in the Planning Policy Wales (PPW) Edition 8, relevant Technical Advice Notes (TANs) as well as local policy and guidance. The PPW brings together all aspects of development, and encourages a holistic approach in achieving sustainable development. I will demonstrate that, through sensitive design, the Site is able to assimilate new development successfully with minimal effects upon the wider area and that the Proposed Development would not cause significant adverse effects on the character, appearance and quality of the landscape. Furthermore, I will also show that the visual amenity of the area would be improved as a result of this sensitively designed scheme which will deliver much needed housing on a brownfield site in a sustainable location.

3.4 The Illustrative Masterplan responds sensitively to the setting of the existing urban edge, the adjacent Special Area of Conservation (SAC) and other land uses surrounding the Site. It provides a strong framework of Green Infrastructure (GI), including generous public open space and a dedicated GCN habitat, which ensures there is robust mitigation of any potential residual detrimental effects upon landscape character or visual amenity.

3.5 Mr Jeremiah gives evidence covering all planning aspects.

4.0 THE SITE - CONTEXT, CHARACTER AND VISUAL AMENITY

- 4.1 The principal features of the Site and its context, as described within the LVIA, are summarised below.

Context and Land Use

- 4.2 The Site is brownfield land located to the east of Johnstown and was formerly the Hafod Tileries site. It is enclosed by well-established hedgerows with intermittent tree planting along the southern and western perimeter of the site. The Site is open along its northern and eastern boundaries with the exception of intermittent native hedgerow planting and the existing semi-derelict workings which are concentrated within the north-eastern corner and accessed from Hafod Road. This building complex is on an area of hardstanding and comprises several single and two storey red brick units abutting Hafod Road, the majority of which are linked to form a continuous developed edge along the north-eastern boundary. There is also a separate large scale (long) building set back from the road abutting the northern edge of the Site.
- 4.3 A combination of grassland, bare ground and scrub dominates the central and southern parts of the Site which is also bisected by a high voltage national grid power line as well as a local power line and the narrow Aberderfyn Brook which is defined by hedgerow and tree planting. The Site is defined by Hafod Road along its eastern edge and Bangor Road (B5426) to the south. Hedgerow and tree planting defines the western boundary and a combination of vegetation and fencing defines the northern and north-western edge. A local works area (Enviroclear) occupies land immediately north of the Site beyond which is Bonc-yr-Hafod Country Park (previously a landfill site) on higher ground. Open farmland lies to the east and the current Hafod Landfill Site (disused clay pit) is located to the south while the landscape immediately west of the Site is a designated Special Area for Conservation (SAC) and Site of Special Scientific Interest (SSSI).
- 4.4 A public right of way ('RUA/ 117') follows the outer western site boundary and connects to two further footpaths, one of which ('ESC/ 28') crosses the northern part of the Site linking to Hafod Road, the other ('ESC/ 24') veers northwards through the adjacent fields towards the country park and railway line. A fourth footpath ('ESC/ 29') crosses the south-eastern corner of the Site. Together these footpaths provide connectivity to the surrounding right of way network; Wat's Dyke Long Distance Heritage Trail traverses the landscape in a north to south direction to the east.
- 4.5 The landscape character of the Site is that of typical brownfield land; generally derelict with areas of natural regeneration. Despite this, there are urbanising influences from the settlement areas of Johnstown, Rhosllanerchrugog and Ponciau as well as the Vauxhall Industrial Estate which provide a distinctive developed edge to the west and south-west of the Site, while the landfill site is prominent to the south. Semi-rural and agricultural influences include the open fields east of Hafod Road together with the country park to the north, although this is a man-made feature.
- 4.6 The Site lies adjacent to the Johnstown Newt SAC and Stryt las A'r Hafod SSSI, designated for its great crested newt (GCN) population. Part of the local Minerals Buffer Zone falls within the southern section of the Site. There are no other designations within close proximity of the Site nor is the Site or its immediate context covered by any landscape quality designation. It is therefore appropriate to carry out a review in terms of the range of local factors that contribute to landscape

value as set out in GLVIA3 (box 5.1, pg 84), and included within Appendix 2 of this Proof of Evidence. This is described below; the relevant extract from GLVIA3 is included at Appendix 10.

- 4.7 Landscape Quality (condition): The Site is fragmented, being predominantly brownfield land with semi-derelict buildings and areas of hardstanding in the northern and eastern parts while some natural regeneration has occurred in the south and west. Bare ground is also evident across the Site area. Vegetation within the Site is well-established and the hedgerows are assessed as being important from a biodiversity perspective. The majority of these would be retained and enhanced as part of the development's GI proposals.
- 4.8 The site and surrounding area is not designated in terms of landscape quality or value at a national or local scale, which is generally a strong indicator of a landscape of high quality.
- 4.9 Scenic Quality: Although the Site is locally distinctive; given its former use and historic associations (some remnants of which remain evident) due to its brownfield character, the Site in itself does not exhibit any particular aesthetic or scenic quality. This is further reflected by the fact that the site is not covered by any national or local landscape quality designation.
- 4.10 Rarity and Representativeness: The Site is only rare within a localised context in the sense that it is the former brickworks site. Some of the built features (what remains of them) showcase the product of the site which is commonplace within the locality. Landscape features are not rare being representative and typical of those surrounding Johnstown.
- 4.11 Conservation Interest: The Site is not covered by any designations for archaeological or cultural heritage interest such as listed buildings or conservation areas. While the Site lies adjacent to the Johnstown Newt SAC/ Stryt las A'r Hafod SSSI, being separated from it by well-established hedgerow planting along the Site's western edge and the Enviroclear works immediately north of the Site, it is not protected for its (potential) ecological value. An Ecological Appraisal (Phase 1 Habitat Survey) of the site and surrounding area has been undertaken which identifies habitats within the site together with protection and mitigation measures.
- 4.12 Recreational Value: Two public rights of way cross the Site, the routes of which would be retained and integrated within the proposed development. A PRoW also follows the western site boundary. Johnstown and the surrounding settlement area benefits from a well-established footpath network connecting the community with the countryside so the routes crossing and bordering the Site are not of particular merit. Furthermore, they are not identified as long distance leisure trails. The remainder of the Site is private land therefore it has no active recreational use.
- 4.13 Hafod Country Park is located to the north of the Site. While this is visually prominent from the site, views towards the site from the country park are limited due to broadleaf woodland planting. There is a single elevated vantage point at the southern edge of the plateau from which the site is visible together with Johnstown and Ponciau to the west.
- 4.14 Perceptual Aspects and Associations: The Site is neither wild nor tranquil due to its close relationship with the settlement edge and railway line to the west and the busy A483 to the east. The high voltage power lines crossing the Site as well as the continual activity at the Enviroclear works to the north further prevent any sense of tranquillity.
- 4.15 Dennis Ruabon Tiles was founded in 1878 by entrepreneur Henry Dennis. First known as the Ruabon 'Red Works', the factory used pure Welsh clay in its production of ridge tiles, chimney pots and ornamental terracotta before developing the famous 'quarry tile'. The Tileries went on to produce a range of flooring and roofing tiles as well as red bricks which were used in the

construction of much of the built development within the locality as well as a number of historic buildings. Significant investment during the early 1980s enabled modernisation of the factory and subsequent development of the product range until its ultimate closure in 2008, after 130 years of manufacturing.

- 4.16 In summary, having appraised the above factors, it is considered that the Site and immediate landscape surrounding it is of Medium-Low landscape value overall. This is in accordance with GVLIA guidelines (refer to Appendix 2) which states:-

“Landscape receptors of medium/ low importance based upon factors of quality, rarity, representativeness, conservation interest, recreational value, perceptual qualities and associations.

Capable of substitution/ potential for landscape improvement and creation.”

Topography

- 4.17 The Site sits within the broad valley of the River Dee at between 100m and 120m AOD and is relatively flat. The landscape rises locally to the north where the country park is situated and further west, continuing to rise towards the distinctive Ruabon Mountain which has a summit of approximately 475m AOD and Maesyrychen Mountain and the Llantysilio Mountain Range beyond.
- 4.18 The LVIA topography plan shows how the Site is located at a similar level to the settlements of Johnstown (the eastern part) and Ruabon which sit at a topographical level of between 100-140m and 100-120m AOD respectively.

Landscape Character

- 4.19 The Site is predominantly derelict brownfield land and is not consistent in character with the surrounding landscape. Indeed, in the Officer's Report, it is stated that **“the site is a derelict and dilapidated brownfield site”**. Internal features are limited to hedgerows, intermittent hedgerow trees, two small groups of trees and a small area of broadleaved woodland. A watercourse, with riparian planting, and public rights of way cross the Site. The character of the urban edge is modern, with the historical core of Johnstown to the west, away from the Site.
- 4.20 The Site falls within National Landscape Character Area 13: ‘Deeside and Wrexham’ (key characteristics are included at Appendix 11) and, at a county level, Wrexham Landscape Character Area 7c: ‘Rhosllanerchrugog – Rhostyllen, Ruabon – Pen y Cae’; the LVIA sets out in detail the relevant extracts from the LANDMAP SPG (March 2007) for this area, the full description is included at Appendix 12 of this Proof of Evidence. The overall management strategy for area 7c is to promote, **“enhancement, conservation and sustainable development.”** Landscape character is illustrated at Figure 2, Appendix 13.
- 4.21 The LVIA concludes from its own analysis that the landscape in the immediate context of the Site is of **Medium to Low sensitivity**, with the Site itself considered to be of **Low sensitivity**.
- 4.22 The Proposed Development has been informed by the landscape character and features, taking account of existing habitats. New structural landscaping to the perimeter of the scheme would be implemented to reinforce local landscape character and ecological function as well to provide a good transition with the wider landscape.

Visual Amenity

- 4.23 The range of potential visual receptors is identified in section 4 (4.12 - 4.31) of the LVIA. These include:-
- **Residents:** South Lane/Johnson Street, Ponciau (representative of properties on high ground some 1.5km to the west of the Site) and Glasfryn (immediately west of the railway line close to the western edge of the Site);
 - **Road Users:** Hafod Road;
 - **Public Rights of Way Users:** footpaths 'ESC/ 28' and 'ESC/ 29' (which cross the Site), 'RUA/ 117' (following the Site's south-western boundary), 'ESC/ 24' (immediately north-west of the Site), 'ESC/ 31' (immediately east of the Site); and
 - **Recreation:** Hafod Country Park to the north.
- 4.24 The LVIA identifies the approximate extent of visibility of the Site at Figure 5, Appendix 13, acknowledging at paragraph 6.15 that “...the availability of open views into the application site are limited and broadly identified as being close to mid-range views from few sensitive receptors at specific points close to the site's perimeter. Localised topography, tree and hedgerow cover restrict visibility of the site from the majority of the wider landscape”.
- 4.25 The existing scene shows that there is already a fully developed residential edge close to the western boundary of the Site providing a backdrop and context to it. The Proposed Development would sit comfortably within this context. The LVIA acknowledges at paragraph 7.3 that, “The proposed development would be seen in the context of the existing settlement area of Johnstown...the proposed development would be located within an established urban setting and would be seen as a component of the landscape rather than dominating it...” and at paragraph 7.7, “...The proposals would contribute positively to the landscape and would not be incongruent with its setting of the existing urban edge...” In my opinion, the change in view would be neither discordant nor significantly harmful to the existing scene.
- 4.26 Overall, there are no features of intrinsic landscape interest within the Site apart from the limited boundary vegetation, tree cover and public rights of way. The visual receptors that would be most affected are those of the highest sensitivity having direct close range views of the Site. These primarily comprise residents of Hafod Residential Care Home and Hafod Farm to the east of the Site, users of local public rights of way crossing and bordering the Site as well as users of the country park. However, in general the Site is well contained in landscape and visual terms.

5.0 THE MASTERPLAN PROPOSALS

- 5.1 Design and mitigation measures are integral approaches that have been adopted as part of the iterative design process. This process has considered the location of development within the Site, together with matters of access and drainage while also addressing existing landscape features and the provision of a GI framework, including the requirement for GCN mitigation. The client has therefore worked very closely with all members of the design and environment team in order to prepare a scheme which evolved in response to the constraints and opportunities presented by the Site. The resulting scheme is responsive to the sensitivities of the Site and its setting. The design process has been both iterative and sympathetic.
- 5.2 The proposals would create a coordinated mixed use development for up to 300 new homes, employment land and a local store together with associated public open space and a GCN reserve. Vehicular access is proposed from Bangor Road. The planning application comprises:-
- **Residential = 7.0 ha (3.96 acres) Net Developable Area**
 - **Employment (B1, B2, B8) = 0.29 ha**
 - **Local Store = 0.11 ha**
 - **Equipped Play Area (LEAP)**
 - **GCN Reserve = 5.82 ha**
 - **Green Infrastructure = 3.83 ha (includes attenuation pond, structure planting and informal play)**
 - **Total Site Area = 17.34 ha**
- 5.3 GI has been designed to provide a buffer and soften the edges of the Proposed Development as well as responding to site constraints and adjacent land uses. The potential treatment of the development fringes as well as within the development is shown on the visuals included at Appendix 5, 6, 9 and 14.
- 5.4 The Proposed Development would conserve the Site's existing trees and hedgerows with the exception of that lost in order to facilitate the new Site access. This would be compensated for by new structural landscaping and tree planting adjacent to the roundabout and along Bangor Road, creating a strong and attractive green entrance to the development as well as filtering the employment buildings. Semi-mature planting could be used at the Site entrance and along Bangor Road for early impact. Reinforcement native planting would be implemented where necessary across the Site, particularly the existing mature hedgerow which runs adjacent to PRow 'RUA/ 117' along the south-western boundary of the Site as this would provide an effective visual buffer to the Proposed Development.
- 5.5 The GI would incorporate structure planting along the northern and north-western edges of the Site to reinforce and connect the existing sections of hedgerow and tree, as well as along the south-eastern edge to provide further containment of the built development and connect existing woodland belts both on and adjacent to the Site. A high proportion of feathered whips and standards could be used throughout to provide some immediate screening effect.
- 5.6 An extensive area of public open space (POS), within the south-east of the Site and along the south-western edge of the built development, would cater for informal and passive recreation as well as outdoor play space; both formal equipped children's play and informal play. Residential

development would face outwards presenting an active frontage to the POS. Existing PRoW crossing the Site would be retained and incorporated within the scheme along their current alignment to maintain connectivity between the Site boundaries and with the wider landscape, as well as providing a direct link into Johnstown. New footpaths and cycleways would connect to the PRoW providing a network throughout the Proposed Development. Adjacent to the POS is a specifically designed reserve area for the great crested newt population comprising of areas of open water and terrestrial habitats, grassland and scrub. This reserve would cover one third of the total Site area within the western part of the Site, either side of the brook, affording a strong connection to the existing pond network immediately adjacent to the north-western Site boundary and south of Bangor Road. The GCN reserve would not be publicly accessible. Both the POS and GCN reserve would encompass areas of new broadleaved woodland, tree and hedgerow planting. Wetland habitats would incorporate attenuation ponds and swales with marginal and aquatic planting encompassed within marshy grassland. These would be set predominantly within the GCN Reserve, with just a network of swales within the POS, and offer potential to introduce new wetland habitats that link with existing riparian vegetation located along the watercourse.

- 5.7 Housing around the periphery has been designed to achieve a loose arrangement, avoiding a hard built edge and allowing views through the development. As set out in the Design and Access Statement, built form and fabric would be designed to reflect the best examples of local distinctiveness so that the built form blends visually with existing settlement characteristics. The Site provides great opportunity in terms of its history which should also be reflected in and inspire choice of materials and design detail. This would be determined at reserved matters stage. New tree planting along the internal road layout as well as on plot would 'break up' the roofscape and soften the appearance of the built development and street scene, helping to integrate it into the surrounding landscape.
- 5.8 This approach is consistent with the management guidelines for local landscape character area 7c in the following ways:-
- Enhancement of neglected or derelict land;
 - Improvement to the environment for pedestrians and cyclists within settlements through the development of accessible natural green space and green network;
 - Development of wildlife corridors, as part of a green network, linking areas of fragmented habitats;
 - Maintaining ponds and protected GCN;
 - Maintaining, enhancement and expansion of scrub, broadleaved woodland and hedges.
- 5.9 It also provides opportunity to recognise the historical importance of the Site through design detail as well as raising public awareness of this through the use of interpretation boards within the Proposed Development.
- 5.10 Existing landscape features would be reinforced by the introduction of new tree and hedgerow planting needed to reduce the visual impact of the built development and the access roads. This framework of GI would assist in further assimilating the new development into its landscape context whilst mitigating potential adverse effects upon local views. The development would therefore be set within a strong GI which draws upon and enhances the existing framework to maximise recreational and wildlife value.

- 5.11 The GI would be designed and managed to encourage biodiversity, landscape and sustainability benefits and would include a mix of connected habitats that, in turn, connect with existing hedgerows and trees both within the Site as well as the wider landscape. It would include new species rich hedgerows, wetland habitats, individual tree planting and varied grassland habitats. Overall, the proposals would provide a considerable net gain in natural habitats which, through an increase in tree cover as well as delivering a range of biodiversity benefits would enrich both the landscape and the natural environment of the Site overtime, as the new planting matures.
- 5.12 The GI proposals provide a comprehensive and appropriate landscape treatment to the Proposed Development, ensuring an appropriate buffer to the SAC/ SSSI to the west as well as a sensitive transition between built development and the open countryside to the east. New tree and hedgerow planting would enhance the existing vegetation that currently filters views of the Site. The detailed landscape scheme would be covered by a planning condition.

6.0 EFFECTS SUMMARY OF THE PROPOSED DEVELOPMENT

- 6.1 I have re-visited potential effects of the Proposed Development upon both the landscape and visual resource in accordance with an up-to-date methodology. A summary of the anticipated effects is outlined below.

Landscape Character

- 6.2 The Proposed Development would be located on a brownfield site which is not recognised by any landscape quality designation. Planning Policy Wales (PPW) Edition 8 seeks to “*promote resource-efficient settlement patterns that minimise land-take...especially through preference for the re-use of suitable previously developed land, wherever possible avoiding development on greenfield sites*” (pg 59, para 4.4.3, bullet 1).
- 6.3 The scheme would regenerate the Site through its delivery of residential development, small scale employment and extensive green space. This is a normal component within views around settlement generally and would have limited effects in comparison with other developments such as new roads, industrial facilities or other infrastructure/ energy projects. Houses are not necessarily unsightly in themselves moreover it is the degree of contrast or integration in relation to the existing landscape character and the nature of the existing urban edge which can lead to adverse effects. A Landscape Effects Table (LET), detailing effects during construction, at the year of completion and 15 years after completion, is included at Appendix 2.
- 6.4 At a national level, the Site is located within landscape character area 13: ‘Deeside and Wrexham’. The Site forms a very small parcel of land within this area and demonstrates few of its key characteristics being strongly influenced by the surrounding industrial heritage, settlement fringe to the west as well as farmland and the busy A483 to the east. The Proposed Development would not cause a noticeable departure from the existing characteristics of the wider area. There would be a Negligible effect upon the national character area overall, at 10 years post completion.
- 6.5 At county level, the Site falls within landscape character area 7c: ‘Rhosllanerchrugog – Rhostyllen, Ruabon – Pen y Cae’ which is under the ‘Rural/ Urban Villages’ classification. This is a well settled area, particularly the central (where Johnstown is located) southern and north-eastern parts, and is described as “*closely built former mining communities with a rich cultural heritage, located on the lower slopes of the Ruabon Mountain, and distinguished by the widespread use of local Ruabon red brick*”. The Proposed Development would not be out of character with the surrounding context; the new built form would be in scale with the existing settlement edge and would be built from materials that are reflective of the local vernacular. The proposals would assist in delivering some of the Management Guidelines for the character area through its landscape enhancement as well as the retention and strengthening of green links. Landscape effects upon the character area would be Minor Beneficial at completion/ 10 years post completion.

Local Landscape

- 6.6 Looking specifically at the Site and the localised landscape surrounding it, there is a mix of urban, industrial, reclamation and agricultural land uses. The replacement of the former brickworks with the Proposed Development would result in permanent albeit localised changes within this

landscape. The majority of the built development (housing element) would be confined to the north-eastern part of the Site, where existing buildings and areas of hardstanding are currently located, and the southern edge of the Site. There would be significant improvement and enhancement through new tree and hedgerow planting, areas of grassland, water bodies within the proposed GCN reserve and public open space as part of the new GI framework. The overall character of the immediate context would broadly remain. The Site itself contains few features of landscape interest other than the Aberderfyn Brook corridor, which bisects the area, and well-established hedgerows and tree planting, most of which would be retained. New landscape planting along the Site boundaries as well as new trees, shrubs and hedgerows within the Proposed Development would bring positive benefits to the Site landscape. Furthermore, a varied built edge, with a looser arrangement of properties, would occur along the south-western perimeter of the residential development, overlooking public open space and the GCN reserve, as well as along the eastern perimeter adjacent to Hafod Road, the care home together with the countryside. Resultant landscape effects would be Moderate to Minor Beneficial at the year of completion becoming Moderate Beneficial at year 10.

Designations

- 6.7 The Site is not covered by any landscape quality designations. The Johnstown Newt SAC/ Stryt las A'r Hafod SSSI, located immediately west of the Site, would not be adversely affected by the Proposed Development. The south-western portion of the Site would be dedicated to GCN, providing an extensive reserve for the local GCN population and a 10m wide structural landscape buffer with a series of interconnected swales is proposed along the north-western perimeter, adjacent to the residential housing. Taken together, this would create a robust continuous green corridor between the SAC/ SSSI and the Proposed Development.

Relationship to Settlement/ Settlement Character

- 6.8 In landscape terms it is my opinion that the Proposed Development would be perceived as being part of the settlement of Johnstown for the following reasons:-
- Both the Site and settlement areas to the west, including Johnstown, are all part of the same landscape character area which is a well settled landscape (7c);
 - The Site is located off Bangor Road which provides the key vehicular route into the village;
 - Where there would be views across the entire scheme from more distant and elevated visual receptors, such as Hafod Park to the north and Ponciau to the north-west, it would very much be seen within the context of the existing urban edge;
 - The new housing would predominantly be confined to the existing built area within the north-eastern part of the Site;
 - The Proposed Development would comprise of residential housing, a relatively small amount of employment, a local store and open space including a GCN reserve. Each of these elements are reflective of the surrounding land uses and localised landscape character;
 - Built development would be of a scale similar to that of the existing settlement and residential development would follow a block layout pattern similar to the existing settlement;
 - The Proposed Development would use building materials, colour palettes and elements of detail design that are reflective of the local vernacular within the existing settlement;

- The description for landscape character area 7c acknowledges the cultural link between Johnstown and the Site;
- The landscape buffer between the urban fringe and the Proposed Development is characteristic of the localised landscape, indeed a further SAC/ SSSI lies immediately west of Johnstown and east of Rhosllanerchrugog. Furthermore, local PRoW connecting the Proposed Development with the existing settlement would be retained and enhanced.

6.9 Mr Jeremiah covers settlement pattern, including its historic evolution, within his Proof of Evidence.

Visual Resources

- 6.10 The LVIA viewpoints represent the most relevant receptors to the Proposed Development. These demonstrate the predominantly contained nature of the Site and its relationship with Johnstown, particularly from the more elevated receptors, and that, with the mitigation proposed the scheme would not “*appear isolated in the rural landscape*” yet would “*accord with the character and appearance of the locality*”.
- 6.11 It is important to remember that effects on visual amenity vary depending on distance from the Proposed Development, the existing views and the degree of screening provided by the topography, vegetation and existing built form. The distance between receptors and the Site is important, as visual effects reduce with increased distance.
- 6.12 A full schedule of visual receptors and representative viewpoints, detailing effects during construction, at the year of completion and 15 years after completion, is shown within the Visual Effects Table (VET) at Appendix 3.

Visual Envelope

- 6.13 The visual envelope for the Proposed Development is shown at Figure 5, Appendix 13. It is the area from within which any part of the proposals may potentially be visible and is based upon site analysis together with topographical survey. It should be noted that the visual envelope is not an indicator of the level of significance of the visual effect but, simply, the potential extent of visibility. From parts of the area shown, visibility could be very limited. A visual envelope is never 100% accurate and it is possible that some limited views would be possible from outside the area identified. However, it serves as a tool to indicate the main area from where visual effects could be experienced.
- 6.14 The visual envelope is primarily contained by a combination of landform, existing built development and vegetation which provide localised screening effects. The Site is predominantly flat and perimeter vegetation restricts and filters close and medium range views with only localised areas of higher ground enabling more distant views. It is important to note that the visual envelope does not extend over any extensive areas of the surrounding settlement. This suggests that visual effects of the Proposed Development upon residential receptors would be limited to a relatively small number of properties.

Residential Areas

- 6.15 Hafod Residential Care Home and Hafod House Farm (Receptor F) would experience close range views of the new housing set back from the edge of Hafod Road, beyond the proposed

cycleway and landscape buffer of grass verge with tree planting. It is likely that visibility would also extend along an internal road affording glimpsed views further into the development. However, the extent of visibility would be limited with the appearance of the buildings softened and filtered by landscape planting. Views would be predominantly from first floor level, there is potential for ground level views although these would be minimal and limited. Given that the existing view of semi-derelict buildings would be replaced with new housing and landscaping which would not only filter and soften the appearance of the buildings but would create a softer edge to the road, there would be a Minor Beneficial visual effect at the year of completion and a Moderate to Minor Beneficial effect at year 10 once planting becomes established.

- 6.16 Visibility of the scheme from the residential fringe of Johnstown to the west of the Site is minimal. Visibility from Bryn Hyfryd, Gwalia and Glasfryn (Receptor K), located immediately west of the railway line, would be extremely restricted being limited to first floor level above existing vegetation associated with the railway corridor and adjacent SAC as well as that bordering and within the Site itself. Existing vegetation would be enhanced and reinforced with new tree and hedgerow planting as part of the GI proposals which would further screen the built development. However, any views of it would be confined to the uppermost parts and rooflines and would be limited to relatively few properties closest to the site along Bryn Hyfryd and Gwalia. Resultant visual effects would be Minor Adverse becoming Negligible as the proposed landscaping establishes.
- 6.17 The Proposed Development would be distantly visible from parts of the settlement of Ponciau (Receptor J) which sits on higher ground to the west of Johnstown. While there would be distant views of the built development beyond the GCN reserve and open space the scheme would be a small component within the view and seen very much in the context of the wider settlement area, much of which lies within the foreground, and therefore would not be out of character with its surroundings. Furthermore, views of the new built development would be largely of rooftops, similar to the existing context, and the GI proposed as part of the development would soften and break up the appearance of the built form. Views of the skyline would remain uninterrupted and the overall visual effect upon residents would be Negligible.
- 6.18 Residential receptors are limited to properties close to the Site fringes and those with a more elevated, yet distant, position. Beyond the identified visual envelope there is potential for a small number of individual locations from which the Proposed Development would be visible. However, it would be a relatively small element of a much wider panorama and viewed within the context of Johnstown. The extent of visibility would vary depending upon property aspect and the degree of screening provided by intervening built development vegetation, landform and the proposed GI within the development itself.
- 6.19 Other than Rhosllanerchrugog and Ponciau, there would be no distant views of the Proposed Development from surrounding settlement areas. Consequently, there would be no visual effects upon the local views from any settlement area other than Johnstown, Rhosllanerchrugog and Ponciau.

Public Rights of Way (PRoW)

- 6.20 The definitive rights of way within the vicinity of the Proposed Development and with potential to be affected by it have been given due consideration within the assessment. The closest views would be from 'ESC/ 28' which would pass through the new housing, 'ESC/ 29' which crosses the

south-eastern corner of the Site, 'RUA/ 117' which follows the south-western boundary, 'ESC/ 31' immediately east of Hafod Road and 'ESC/ 24' to the north-west.

- 6.21 Users of PRoW 'RUA/ 117' (Receptor A) would primarily experience views of the new GCN reserve and tree planting which, together with existing retained vegetation, including the Aberderfyn watercourse, would screen the new housing and therefore it is unlikely that there would be any views of it. There is potential for distant views of the local store and employment however these would be limited to glimpses above and/ or through vegetation as would reduce further over time as the new planting establishes. The PRoW would be retained within a green corridor bordering the Site which would be reinforced and enhanced as part of the GI framework for the Proposed Development.
- 6.22 The extent of visibility of the Proposed Development would vary along the route of PRoW 'ESC/ 28' (Receptor B). Views from the south-western end would be predominantly of the GCN reserve and new planting where there are gaps in the hedgerow along the Site boundary otherwise visibility would be limited to glimpsed views through it. Potential views of the proposed built development would be minimal and limited to glimpses of rooftops beyond the existing retained vegetation and new trees throughout the reserve area. When taken together, these features would largely screen, or heavily filter, visibility of the majority of the built form. Activity along a short section of the main access road would be visible however this would be extremely intermittent given the level of existing and proposed landscape planting throughout the reserve area as well as along the access road itself. Further east along the PRoW there would be close range views of the new housing as the footpath passes through the built development area. New tree planting proposed along internal roads as well as on-plot would assist in softening the appearance of the buildings.
- 6.23 From PRoW 'ESC/ 31' (Receptor E) there would be close range views of the new housing set back from Hafod Road beyond the proposed cycleway and landscape buffer of grass verge with tree planting. The block layout would create a varied depth of view, allowing visibility into the Site between development blocks. However, the extent of visibility would be limited with the appearance of the buildings softened by tree planting along Hafod Road and internal roads as well as on-plot.
- 6.24 As with 'ESC/ 28', the extent of visibility from PRoW 'ESC/ 29' (Receptor G) would vary depending upon location along the footpath as well as direction of travel. The PRoW would pass through the proposed public open space therefore immediate views would be of that together with new and retained landscape planting. When travelling northwards there would also be views of the children's play area with the residential development providing a backdrop to this and the open space. There is potential for glimpsed views of the GCN reserve beyond the new landscaping proposed within the open space and along the access road. This landscaping would filter visibility of the new housing within the northern part of the Site. Views would be concentrated around the south-eastern area and the housing fringing the open space. When travelling southwards the employment and local store would be visible from a short section of the footpath only due to it being contained by existing and new tree and hedgerow planting.
- 6.25 Inevitably there would be a significant change in the local views from PRoW 'ESC/ 28' and 'ESC/ 29', however they are not recognised trails and are relatively short sections of the localised footpath network. Importantly, there would be an overall improvement to the existing views from these footpaths which would be retained along their current alignment and integrated within the

Proposed Development's GI framework. Resultant visual effects upon PRoW 'RUA/ 117', 'ESC/ 28', 'ESC/ 31', 'ESC/ 29' would be Minor Beneficial at the year of completion and would vary between Moderate and Minor Beneficial at year 10 depending on proximity to the Proposed Development and the degree to which existing views and the overall recreational experience would be improved.

- 6.26 Views from PRoW 'ESC/ 24' (Receptor C) would be largely restricted to the 10m wide belt of native structure planting proposed along the north-western boundary. This would reinforce the existing hedgerow, providing a robust landscape buffer and visual screen as well as strengthening the overall GI. Due to the proximity of this receptor to the Site boundary, views of the new built development above the proposed vegetation would be extremely minimal and limited. It is likely that no more than rooftops would be visible once the new structure planting is established. There is potential for the new housing to be glimpsed through the new planting, however this would be dependent upon the detailed planting design and species mix. Visual effects would be Moderate to Minor Adverse at the year of completion reducing to Minor Adverse once planting becomes established.
- 6.27 There is potential for more distant views from PRoW 'RHO/ 27', which passes through Johnstown to the west of the Site, as it reaches higher ground however views would be restricted to gaps between existing housing or across the existing roofscape and the Proposed Development would be seen in the context of the existing urban setting. Visibility of the built form is likely to be obscured by the existing settlement edge, intervening vegetation and new landscaping proposed as part of the scheme; this would help soften its appearance.
- 6.28 There is potential for views of the Proposed Development from other, more distant, PRoW however these are likely to be glimpsed views only and effects would be Negligible.

Road Users

- 6.29 Potential views of the Proposed Development would be limited to the local road network only. The range of available views is greatly influenced by the topographical nature of the area combined with vegetation along field boundaries and at roadsides.
- 6.30 In terms of close range visibility, users of both Bangor Road (B5426) (Receptor H) and Hafod Road (Receptor I) would experience intermittent views. However, any views would be transient and infrequent, particularly from Bangor Road where the existing boundary vegetation and proposed structure planting would provide an effective visual screen, largely limiting views to when passing the south-eastern corner of the Site, where open space would be visible, and the new roundabout access from Bangor Road. There is also potential for glimpses of the employment element through the retained and enhanced boundary vegetation and there would be glimpsed views of the new housing when passing the Site entrance however these would be limited and minimal. The long term effect upon local views would be Minor Adverse once planting establishes.
- 6.31 Users of Hafod Road would see more of the Proposed Development when passing the Site, although the extent of visibility would vary depending upon location along the road and direction of travel. Furthermore, views of the proposals would be limited to the section of road bordering the Site and a very short section immediately north of the Site when approaching from the north. Such views would be predominantly of the development (new housing) fringe set beyond the proposed cycleway and buffer planting immediately adjacent to the roadside which would help

soften and filter view of the built form. At the southern end of the road, near to the junction with Bangor Road, views would primarily be of new tree planting adjacent to the roadside and the public open space set beyond this. It is likely that the new housing would also be visible although views would be filtered by the new landscape planting within the natural green space. Views of the new housing would be softened by new tree planting adjacent to the cycleway proposed along the eastern edge of the Site. New tree planting along internal roads throughout the residential development would punctuate the roofscape, further helping to soften the appearance of the built form and filter potential views. The Aberderfyn corridor would provide an effective visual buffer to the local store and employment buildings. While there is potential for glimpsed views of these from a very short section of the road, their visibility would become less apparent over time as the proposed landscaping establishes. Overall, there would be an improvement within the view resulting in Minor Beneficial visual effects both at the year of completion and at year 10 when new planting has become established.

- 6.32 The low lying landscape of the Site together with intervening field boundaries and vegetation along roadsides as well as the railway corridor largely prevents views from other surrounding local roads and lanes. Any potential distant views (most likely from higher ground to the west) of the Proposed Development are likely to be intermittent glimpses of the new buildings which would be set within an extensive panorama of numerous built elements, including the urban context of Johnstown.

Other Receptors

- 6.33 Users of Hafod Country Park (Receptor D), located immediately north of the Site, would experience visibility from specific vantage points only, where open views across the Site and wider landscape are afforded. The Proposed Development would be seen in the context of Johnstown and Ponciau as well as the busy A483 corridor to the east and Hafod Landfill Site to the south. Proposed landscape planting would assist in 'breaking up' the roofscape of the new housing, softening its overall appearance and the GI framework, including open green space and the GCN reserve would provide an attractive setting for the built development. While there is potential for views of the proposed local store, employment buildings and associated car parking, these elements would be more distant and heavily filtered by existing retained vegetation along the Aberderfyn as well as new planting within the proposed open space. Overall, there would be an improvement in the view; the semi-derelict buildings would be replaced with new housing and the remaining site area would be transformed into public open space and a GCN reserve, replacing areas of existing hardstanding and debris. Resultant visual effects would be Minor Beneficial both at the year of completion and at year 10 when new planting has become established.
- 6.34 Users of the Shrewsbury to Chester Railway Line may experience glimpsed views of the proposed Development when passing by the Site however any visibility would be extremely limited and minimal due to the level of intervening well-established vegetation together with the proposed landscaping along the north-western perimeter of the Site. Views would be infrequent, transient and at relatively high speed resulting in a Negligible visual effect overall.

7.0 REASON FOR REFUSAL AND DELEGATED OFFICER'S REPORT

- 7.1 I have demonstrated the level of care and consideration that has been employed in preparing the Illustrative Masterplan and the effectively designed and mitigated scheme which is the end product.
- 7.2 As described at section 3 of this Proof of Evidence, the Decision Notice (CD6.1) does not contain a specific landscape reason for refusal nor does the Officer's Report (CD5.1) include a section relating specifically to landscape. Furthermore, there was no specific landscape response during the determination period of the outline planning application, only a response from the WCBC Tree Officer who raised no objection (CD4.22). An objection from National Grid has since been withdrawn following the submission of additional cross sections through the Site area which demonstrated distances between the power lines/ pylons and proposed housing, and a holding objection from Network Rail was also removed. There were no other objections from statutory consultees in relation to landscape issues.

Reason for Refusal

- 7.3 Dealing in turn with each element of the reason for refusal relating to landscape, my comments are as follows:-

“The development would appear isolated in the rural landscape”

- 7.4 As mentioned in section 6, the visual envelope of the scheme would be limited and, where views would be available, it would very much be seen in the context of the existing settlement edge of Johnstown as well as the more elevated area of Ponciau and the busy A483 transport corridor which has an urbanising influence upon the Site (Viewpoint 5, Figure 8, Viewpoint 9, Figure 10, Appendix 13). The Proposed Development would therefore not *“appear isolated in the rural landscape”* and furthermore, the local landscape cannot be described as wholly rural given the surrounding urban influences. Importantly, the Proposed Development would be connected to its surroundings including Johnstown, the country park and SAC/ SSSI by retained PRoW as well as a new section of footpath along Bangor Road. Extensive GI proposed as part of the scheme would also reinforce existing and create new green linkages between the Site and its context.

“The development would not accord with the character and appearance of the locality”

- 7.5 In terms of landscape character the proposal for residential housing, small scale employment, a local store and open space is entirely in accordance with the character and appearance of the locality. The local landscape has a mixed character of both urban and rural land uses; most notably, and within the immediate context of the Site, the existing settlement fringe which comprises of housing development as well as the Vauxhall Industrial Estate, Hafod Country Park and the Johnstown Newt SAC/ Stryt las A'r Hafod SSSI. Farmland to the east is separated from the Site by Hafod Road while the Hafod Residential Care Home provides further separation and an element of development context. However, the new housing proposed along the eastern perimeter of the Site would be a relatively loose arrangement to create a varied built edge which would be enhanced by a landscaped verge to soften the appearance of the built form as well as providing an improved transition between development and the countryside.

- 7.6 Importantly, a large proportion of the Site, in its existing form, comprises of semi-derelict industrial and commercial buildings with associated hardstanding. In my view the Proposed Development would not only accord with but wholly enhance the character and appearance of the locality.

Delegated Officer's Report

- 7.7 Under the 'Principle' section of the report it is stated that, *"the residential development of this land would be materially detrimental to the landscape and would fail to accord with the character of the site or make a positive contribution to the appearance of the nearby locality"* (para 3).
- 7.8 The Proposed Development would provide a wide range of benefits to the local landscape and visual amenity of the area. I do not see how the re-development of this brownfield site, through the replacement of its semi-derelict buildings and large areas of hardstanding with new housing, small scale employment and local store set within a well-designed generous Green Infrastructure for the new and existing community to enjoy *"would be materially detrimental to the landscape"*.
- 7.9 Again, the scheme would be entirely in accordance with the character of both the Site and its context and would make a significant positive contribution to the appearance of the nearby locality.
- 7.10 Under 'Scale, Design and Site Layout' the report states, *"the development could acknowledge the historical importance of the site through its proposed design, use of materials and on-site interpretation...the surviving materials should be retained and incorporated into the new development where possible particularly in more prominent or publically visible areas of the site such as entrance points or as part of interpretative features."*
- 7.11 The Proposed Development provides opportunity to acknowledge the former brickworks through its use of materials, colour palette and detailed design together with good interpretation of the brickwork's history and its heritage significance which could be creatively incorporated within the public open space. Elements such as these would be key to ensuring the scheme reflects the heritage interest of the Site.
- 7.12 The report acknowledges in respect of ecology that:-

"The proposal is not likely to be detrimental to the maintenance of the favourable conservation status of the great crested newt population, nor will the scheme affect the character and integrity of the SSSI. The provision of the dedicated nature reserve/ parkland and other methods of avoidance will prevent any direct impacts of the proposed development upon the site, subject to long term ecological management."

8.0 POLICY

- 8.1 Mr Jeremiah deals specifically with policy, while I will just review what is relevant to landscape and visual matters. The application encompasses a logical sustainable extension. The Development Framework Plan has evolved from a thoroughly researched environmental evidence base to deliver a well-considered and appropriate solution.
- 8.2 Consequently the proposals prove to be robust when assessed against the cascade of environmental policies extending from the PPW Edition 8 through to the policies of Wrexham County Borough Council.

Planning Policy Wales (PPW) Edition 8

- 8.3 The PPW sets out the land use planning policies of the Welsh Government and their commitment to delivering growth in sustainable locations. Throughout the document, aspirations are generally positive. A holistic approach is encouraged, balancing benefits with impacts across all aspects of the development process.

4.4 – Sustainability Objectives

- 8.4 A series of sustainability objectives reflect the vision for sustainable development across Wales, those relevant to the Proposed Development in respect of landscape are:-
- *“Promote resource-efficient settlement patterns....especially through preference for the re-use of suitable previously developed land, wherever possible avoiding development on greenfield sites (pg 59, para 4.4.3, bullet 1);*
 - *Contribute to the protection and improvement of the environment, so as to improve the quality of life and protect local and global ecosystems. In particular, planning should seek to ensure that development does not produce irreversible harmful effects on the natural environment and support measure that allow the natural heritage to adapt to the effects of climate change. The conservation and enhancement of statutorily designated areas and of the countryside...; the conservation of biodiversity, habitats and landscapes...; and enhancement of the urban environment all need to be promoted (pg 60, para 4.4.3, bullet 9);*
 - *Contribute to the protection and, where possible, the improvement of people’s health and well-being...; (pg 60, para 4.4.3, bullet 11)*
 - *Promote access to.... open and green space... (pg 60, para 4.4.3, bullet 12);*
 - *Help to ensure the conservation of the historic environment and cultural heritage...” (pg 61, para 4.4.3, bullet 19).*
- 8.5 The Proposed Development would meet each of the above through:-
- The re-development and revitalisation of a brownfield site;
 - Provision of an extensive GCN reserve which would significantly benefit the local GCN population and provide an enhanced buffer to the adjacent SAC/ SSSI (the GI proposals would ensure no harmful effects overall);
 - Improvements to the localised landscape character, visual amenity and transition between the urban fringe and countryside edge;

- Provision of new public open space with retained PRow and new footpaths/ cycleways with links to the existing settlement and surrounding landscape;
- Opportunity to draw upon the Site's history and heritage interest through design detail and interpretation.

4.11 – Promoting Sustainability through Good Design

- 8.6 PPW defines design as *“the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings”* (pg 71, para 4.11.1).
- 8.7 The scheme would enhance the localised character not only through the re-development of a brownfield site but through its considered layout which takes account of the existing site constraints together with the surrounding context, its relationship to this and any potential effects that may occur as a result of the Proposed Development.

5.1 – Conserving and Improving Natural Heritage and the Coast Objectives

- *“Promote the conservation of landscape and biodiversity, in particular the conservation of native wildlife and habitats (pg 81, para 5.1.2, bullet 1);*
 - *Ensure that statutorily designated sites are properly protected and managed (pg 81, para 5.1.2, bullet 3);*
 - *Safeguard protected species” (pg 81, para 5.1.2, bullet 4).*
- 8.8 The Proposed Development would meet the above through its extensive GI framework including a dedicated GCN reserve, green links and public open space.

Technical Advice Notes (TANs)

TAN 12: Design (2014)

- 8.9 The following objectives have been considered within the Design and Access Statement (CD1.5) and throughout the design process which demonstrates that in principle a high quality design could be delivered at Reserved Matters stage.

Character

- Sustaining or enhancing local character
- Promoting legible development
- Promoting a successful relationship between public and private space
- Promoting quality, choice and variety
- Promoting innovative design

Community Safety

- Ensuring attractive, safe public spaces

- Security through natural surveillance

Environmental Sustainability

- Enhancing biodiversity

Movement

- Promoting sustainable means of travel

Wrexham County Borough Council

Wrexham County Borough Unitary Development Plan (Adopted February 2005)

- 8.10 As noted previously, the Decision Notice does not include a specific 'landscape' reason for refusal. Therefore, each policy that is, in my opinion, relevant to landscape is covered below. It should be reiterated that the Site is not protected by any local or national landscape quality designations and does not fall within the Green Barrier.
- 8.11 PS2: *"Development must not materially detrimentally affect countryside, landscape/ townscape character, open space, or the quality of the natural environment."*
- 8.12 The Proposed Development would not be detrimental to the local area. On the contrary, it would bring a range of benefits, both in landscape and visual terms, from the replacement of semi-derelict buildings and hardstanding with new built development through to the extensive GI encompassing significant new landscape planting and habitat creation together with public open space, retained PRoW and new footpaths/ cycleways.
- 8.13 PS4: *"Development should maintain the existing settlement pattern and character...."*
- 8.14 The scheme would maintain the character of the existing settlement in that it would comprise of predominantly residential housing with a relatively small employment element and a local store. Built development would be of a similar scale to that which makes up the existing settlement and the new housing would follow a block layout pattern, again similar to the existing settlement. All new buildings employ a palette of materials and detailing that reflect the local vernacular.
- 8.15 GDP1: General Development Principles *"All new development should:-*
- 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 wherever possible;*
 - 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."*

- 8.16 In my judgement the Proposed Development is not contrary to policy GDP1 for the following reasons:-
- The built development and landscaping would accord with the character of both the Site and its surrounding context, making a significant positive contribution to the localised landscape character and visual amenity. This would be through the replacement of semi-derelict buildings and areas of hardstanding with new built development encompassed within a well-designed framework of GI including GCN mitigation;
 - The Illustrative Layout demonstrates a legible network and hierarchy of streets with residential properties fronting onto areas of open space and green links to provide natural surveillance. Landscape planting would be designed to avoid the creation of enclosed spaces;
 - Existing PRoW would be retained and supplemented with additional footpaths/ cycleways to provide connectivity throughout the Proposed Development as well as with Johnstown and the surrounding countryside;
 - Existing site features such as the Aberderfyn Brook would be retained and enhanced together with the majority of existing trees and hedgerows. These wildlife habitats would be significantly improved by the extensive GI proposed which would encompass additional tree and hedgerow planting, a GCN reserve and attenuation (water body and swale network) thus creating new habitat and enhancing the localised biodiversity.
- 8.17 EC4: Hedgerows, Trees and Woodland *“Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape...”*
- 8.18 The Proposed Development would conserve the majority of the existing tree and hedgerows present within the Site and along its perimeter with the exception of a small section necessary to create the new roundabout from Bangor Road and access into the scheme. However, any losses would be more than compensated for given the level of proposed landscaping as part of the GI framework. The detail of the proposed landscape planting (species, size etc.) would be agreed with WCBC at Reserved Matters stage to ensure full accordance with the local character and that it meets the objectives of the Wrexham Tree and Woodland Strategy (2005).
- 8.19 Policy CLF6: Informal Recreation provides protection, improvement and maintenance for existing public footpaths as well as identifying and safeguarding potential new routes.
- 8.20 The two existing PRoW within the Site ('ESC/ 28', 'ESC/ 29') would be retained along their current alignment and integrated within the scheme. They would be enhanced as part of the proposals and connected with new sections of footpath/ cycleway to enable full accessibility throughout the Proposed Development.

9.0 SUMMARY AND CONCLUSIONS

- 9.1 The proposal would create a mixed use development for up to 300 residential dwellings, 0.29 ha employment land and a local store with associated infrastructure, public open space and landscape planting as well as GCN reserve. The application was made in outline with all matters reserved except access. The Site has a total area of 17.34 ha.
- 9.2 The application was refused and an appeal was submitted by Gladman Developments Ltd.
- 9.3 The Decision Notice for the application contains no specific landscape reason for refusal. No specific landscape comments were received during the application period and the Officer's Report to committee (CD5.1) does not include a section on landscape. However, it notes:-
- "The residential development of this land would be materially detrimental to the landscape and would fail to accord with the character of the site or make a positive contribution to the appearance of the nearby locality."*
- 9.4 The report concludes:-
- "The development would appear isolated and out of character with the countryside location..."*
- 9.5 I carried out the LVIA which formed part of the application and have since re-appraised the potential landscape and visual effects following the updated methodology, based upon the latest Landscape Institute Guidelines (GLVIA3). I have demonstrated within both this and my evidence that the Proposed Development would not be materially detrimental to the landscape and would accord with the character of the Site and its surroundings, making a positive contribution not only to the Site itself but also the appearance of the locality.
- 9.6 The sensitive design enables new development to be successfully accommodated without causing significant adverse effects upon the local character, appearance and quality of the landscape. On the contrary, there would be improvements to both the landscape character and upon local views as a result of the Proposed Development.
- 9.7 The Proposed Development has been designed to respond to site constraints, adjacent land uses and character. It would conserve the majority of the Site's existing trees and hedgerows with the exception of that lost to facilitate the new roundabout and access road however such losses would be more than compensated within the proposed GI. PRoW would be retained along their existing alignment, also being enhanced and connected with new footpaths/ cycleways. The extensive open space and GCN reserve would provide a robust setting for the built development.
- 9.8 Built form and fabric would reflect the best examples of local distinctiveness to blend visually with existing settlement characteristics and opportunities would be sought wherever practicable to reflect the Site's heritage interest through materials and design detailing. The Site's important history would also be conveyed through appropriate interpretation within the public open space and along PRoW within the scheme.
- 9.9 The eastern edge of the residential development would follow a loose arrangement to allow views into and through the scheme and to create a softer transition between the built development and countryside to the east.
- 9.10 The GI of new species rich hedgerows, wetlands, tree planting, grassland habitats would be designed and managed to reinforce and enrich local character through encouraging landscape

and biodiversity benefits. Furthermore, it would be consistent with the management guidelines for local landscape character area 7c.

- 9.11 The Proposed Development would be located on a brownfield site which is not recognised by any landscape quality designation. The Site is strongly influenced by surrounding industrial heritage, settlement fringe, farmland and the busy A483 transport route. The scheme would regenerate the Site through its delivery of new housing, small scale employment and extensive green space; each of which are normal components of the surrounding area. The proposals would therefore not be out of character with its landscape context; the new built form would be at a similar scale to that within the existing settlement and would use materials that are reflective of the local vernacular.
- 9.12 Overall, there are no features of intrinsic landscape interest within the Site apart from the limited boundary vegetation, tree cover and public rights of way. There would be a Negligible effect upon national landscape character area 13: 'Deeside and Wrexham' and a Minor Beneficial effect upon local landscape character area 7c: Rhosllanerchrugog – Rhostyllen, Ruabon – Pen y Cae'. A Moderate Beneficial effect upon the Site landscape and features (vegetation, land use, open space and PRow) is anticipated at year 10 once landscape planting is established.
- 9.13 The visual envelope for the Proposed Development is relatively contained and does not extend over any extensive areas of the existing settlement. Identified visual receptors that would be most affected are those of the highest sensitivity having direct close range views of the Site. These primarily comprise residents of Hafod Residential Care Home and Hafod Farm to the east of the Site, users of local public rights of way crossing and bordering the Site as well as users of the country park; although views would be restricted to the south facing slope from specific vantage points. More distant views would also be available from Ponciau where settlement is on higher ground. In general, the Site is well contained in landscape and visual terms.
- 9.14 Overall, the Site has logical and defensible boundaries providing the opportunity for sympathetic development. Landscape and visual effects arising from the Proposed Development would be limited and localised and, most importantly, would predominantly be beneficial in any event. The Potential Development would not, in my opinion conflict with Policies PS2, PS4 and GDP1 in respect of landscape.
- 9.15 I recommend the Inspector approves the Proposed Development.