



KRONOSPAN, CHIRK

PLANNING APPLICATION FOR THE DEVELOPMENT OF A WAREHOUSE BUILDING IN THE NORTH EASTERN AREA OF THE SITE AND ANCILLARY WORKS INCLUDING ALTERATION TO EXISTING BUND AND EXISTING EAST WAREHOUSE

PLANNING STATEMENT

JULY 2021

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
2936-01-01	Statutory Plan
7000 607 1/1	East Warehouse Proposal - Kronoplus Section
7000 607 3/3	East Warehouse Proposal - Services Plan
7000 607 D 1/3	East Warehouse Proposal - Planning General Arrangement
7000 649 1/1	East Warehouse – Proposed Ramp and Amendments to Existing Warehouse
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Figure 1	Site Location Plan
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Appendix E – Surface Water Drainage Strategy (Existing System) – Technical Note

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FOREWORD

This document is the Planning Statement for the development of a new warehouse building in the north eastern part of the Kronospan Facility (hereafter referred to as the 'Facility'. There would be ancillary works including altering the existing bund and the adjacent warehouse building. The development forms part of an ongoing development programme to ensure the long-term economic viability of the manufacturing facility and deliver environmental improvements.

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, Pre-Application Consultation Report, planning drawings and an application validation statement.

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.

It is Kronospan's intention to ensure that the Chirk manufacturing site remains a world leading production site. Furthermore, as a result of the Kronospan Vision 2020 investment and development programme Kronospan will be able to deliver continued environmental improvements at the Site.

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 development of a warehouse building with ancillary works which are described in Section 2 (hereafter referred to as the 'Proposed Development').

1.1.2 The Proposed Development would be located at the Kronospan Manufacturing Facility 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 within the Kronospan site is shown on drawing 2936-01-01 and Figure 1.

1.1.3 Kronospan manufactures and distributes wood-based panels, and is a leading manufacturer of products including particle board, medium density fibreboard, laminate flooring and orientated strand board (OSB).

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

- Logyard silos and RCF offloading and grading facilities
- Melamine facing press hall / building
- Wood Chip Preparation Building and 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

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

1.1.6 The additional storage capability that the Proposed Development would allow the business to consolidate the storage of all its products on the Site. Currently, some product is produced on site but transported off site for

storage before coming back to site for distribution or direct onward delivery to customers. Having all products stored within the existing Facility would create an operational benefit by simplifying the logistics of getting the product to customers: instead of involving warehouses elsewhere the logistical operation would be direct from the Site. The demands of customers have also changed particularly during the pandemic and Kronospan is seeking to respond to them. This would also reduce the miles that the product ultimately travels, so having an environmental benefit. Also, relying on third party storage has inherent risks of security and reliability, whilst increasing costs, all of which are operational risks to Kronospan.

- 1.1.7 The Proposed Development would enhance the site's capability and improve the long term sustainability of the business at the Chirk manufacturing site.

1.2 Scope of the Planning Application

- 1.2.1 The planning application will comprise 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 (which includes an assessment of heritage impacts)
 - Arboricultural Impact Assessment
 - Ecological Impact Assessment
 - Noise Impact Assessment
 - Surface Water Drainage Strategy
- 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. Finally, 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 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 development 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 site. As such the proposals are not considered to represent EIA development and therefore the 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 construction of a new warehouse and ancillary works. The location for the Proposed Development is within the existing Kronospan Manufacturing Site, which is located on

land adjacent to Holyhead Road (the B5070), Chirk and covers a total area of approximately 40 hectares.

- 1.4.2 The warehouse would be in the north east of the site with Holyhead Road to the east and existing buildings to the west and south. This part of the site is currently used for open storage and an existing planted bund screens the development from the east.
- 1.4.3 The entirety of the Kronospan site 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 site. A number of industrial process facilities are located in the west portion of the site. These facilities are used to process, sort and dry the raw wood materials used in the manufacture of MDF / particle board and include a number of tall structures including stacks that emit clean process emissions to the atmosphere. The tallest structure on the site 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 site including: a sawmill, formalin plant and the secondary product manufacturing facility (*Kronoplus*) which produces laminate flooring and worktops.
- 1.4.5 The site car park, reception building, weighbridge and main site offices are located in the south eastern corner of the site to the south of the MDF / particle board manufacturing buildings.
- 1.4.6 The western perimeter of the Kronospan site 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 site is formed by Holyhead Road (B5070). An earth bund, planted with trees, has been developed along the eastern perimeter of the site in order to reduce the

visibility of the site 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 site is the Cadbury's (Mondelez) factory, the Chirk AAA sports ground and the Chirk recreational ground.
- 1.4.8 The main residential area of Chirk is located to the east of the site with residential properties lining the majority of the eastern side of Holyhead Road. 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.
- 1.4.9 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 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

- 1.4.10 The Proposed Development will not result in any change to the existing site access arrangements.
- 1.4.11 The site is accessed via 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 site access the B5070 leads to the A5 via Chirk town centre, this route is restricted to non-HGV traffic.
- 1.4.12 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 particle board and medium density fibreboard (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

- 1.6.1 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.
- 1.6.2 The purpose of this consultation is to provide an opportunity for statutory consultees and the public to review development proposals and to raise any issues, or areas of concern that the developer may need to address before submitting an application.
- 1.6.3 The consultation undertaken by the applicant and the feedback received has been described in the Pre Application Consultation (PAC) Report which accompanies this planning application. This section of the Planning Statement briefly outlines the consultation that has been undertaken.

- 1.6.4 Community and Specialist consultees were consulted in writing in accordance with Article 2D of the DMPO 2016. Community consultees were provided details of where the draft application will be available to view and specialist consultees were provided with electronic copies of the draft application via the Axis PED website. Notice was provided to the neighbour consultee and site notices were posted at 3 locations near the site.
- 1.6.5 The information required to be made available by Article 2C(b)(i-v) was deposited in the form of a draft planning application at the Kronospan Reception. A subsequent request by Chirk Town Council for hard copies was agreed to, and the consultation was extended.

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 7000/607 Revision D.
- 2.2.2 The main component of the Proposed Development is the warehouse in the north-east of the Site, which would provide for 15,029sqm (GEA) of floorspace. It would be sited within an area currently consisting of hardstanding which is used for storage of equipment associated with the operation of the wider Site. There is one tree in this area, which is the subject of a TPO, which would need to be removed. This area is a relatively narrow strip of land between a large building to the west, and a large building to the south with a bund extending up the eastern and part of the northern side of the Site. The proposal would consist of the construction of a warehouse building with a width of 60m and a length of 240m. The warehouse would be split into three sections, each of 80m in length.
- 2.2.3 The external walls of the eastern and western elevations of the warehouse would be 8.7m in height. There would be a pitched roof which would increase the overall height to 11.7m, which would be the maximum height of the north and south elevations. The land falls from south to north, so each of the three sections would be 1m lower than the adjacent one to the south, with an internal ramp to bridge this difference. Externally, there would be 6 roller shutter doors on the western elevation of the proposed building, 2 in each section. The walls facing East and North would be constructed of galvanised steel sheeting in Olive Green colour to minimise the visual impact of the building from Holyhead Road.
- 2.2.4 The proposed warehouse would be 20m north of the building to the south, which is known as the East Warehouse. In the space between the two

buildings is a large underground gas main which has influenced the position of the proposed warehouse. There would be an 8.5m ramp proposed to allow access between them. This would necessitate the installation of a new roller shutter door in the northern elevation of the East Warehouse.

- 2.2.5 To the west of the proposed warehouse there is the *East Roadway*, which is an internal road within the site providing access to the north of the site. The distance from the western edge of the warehouse to the eastern edge of the roadway would be approximately 5.7m with some variation. The existing gas main runs in parallel with the eastern edge of the *East Roadway* and has influenced the position of the proposed warehouse.
- 2.2.6 To the west of the southerly third of the building, and beyond the *East Roadway*, there is an area of hardstanding containing several structures. This is the *Log Yard Vehicle Garage Area*. The distance between this area and the proposed warehouse would vary slightly but would be approximately 21.5m at its nearest point. The other two sections of the proposed warehouse, which would be further north, would be opposite *Kronoplus*, which is a large building. It is orientated at a slightly different angle to the proposed warehouse, such that the distance between the two varies from approximately 40m at its widest point to approximately 25m at its narrowest.
- 2.2.7 To the north of the proposed warehouse the existing area of hardstanding would remain.
- 2.2.8 To the east of the proposed warehouse there would be some changes to the existing bund and landscaping. A 4m wide working area is proposed to allow for the construction of the development. Following construction, this would allow for pedestrian access to the eastern side of the building, and would consist of a narrow strip of gravel against the building for emergency escape with the remainder as grass. The distance from the eastern edge of the proposed warehouse to the western edge of Holyhead Road would be circa 18m at its northern-most point, with this distances increasing to the south to in excess of 40m.
- 2.2.9 The existing bund is not uniform in height along its length and is not precisely parallel with either the B5070 Holyhead Road or the existing

hardstanding. Hence, the extent of its removal to create space for the proposed warehouse varies. The impact would be greatest at the north eastern corner of the warehouse, where the 4m wide working area would extend to the bund's furthest extent (ie. for this small section the bund would be removed in its entirety). However, for much of its length the impact would be restricted to less than half of the bund's width, which is also less than the maximum height. There would be a retaining wall constructed to retain the bund beyond the 4m wide working area. The bund and the areas to the east are planted with trees and other vegetation such that the bund itself is not always visible from Holyhead Road. Some trees would be removed including some that are dead but the majority would be retained. An Arboricultural Impact Assessment has been conducted to assess the impact.

- 2.2.10 The proposal would involve the reconstruction of parts of the bund, and planting of trees and other vegetation to provide further screening along the eastern boundary of the Kronospan site.
- 2.2.11 The area of the bund which would be affected by the proposals includes a second tree which is the subject of a TPO. This was planted as a replacement for a tree and is still relatively immature. The intention is to transplant, but more likely replace this tree in a more suitable location.
- 2.2.12 Surface water for the majority of the Site currently drains to two lagoons located on the northern boundary of the Site, each of 2,033sqm in volume. A third lagoon was constructed to take surface water from the log yard.
- 2.2.13 Between the northern extent of *Kronoplus* and the Site's northern boundary a new sprinkler tank is proposed. It would be octagonal with a diameter of approximately 10.8m and a height of 11.4m.

2.3 Proposed Site Operations

- 2.3.1 The Proposed Development would allow for additional storage of products that are produced on Site. This would be instead of storage in warehouses off-site, so removing a stage between product and customer and so would represent an efficiency.

2.3.2 As discussed in the accompanying Design and Access Statement, the size of the proposed warehouse 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 Site.

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 Site for distribution, they would take the same products directly to customers. This would reduce the number of vehicles arriving and leaving the Site.

2.4 Construction

2.4.1 The Proposed Development would require earthworks to prepare the development site. This would include the need to modify the bund along the eastern boundary of the Kronospan site as described in the previous section.

2.4.2 All construction work would be undertaken from the western side of the bund to minimise impact on the bund and the associated vegetation / trees. A series of sheet piles would be piled into the embankment to provide support to the embankment and a retaining wall would then be constructed on the outer face.

2.4.3 Groundworks would then be undertaken across the former open storage area to prepare for the construction of the warehouse.

2.4.4 The building itself would consist of a steel portal frame, and clad with Rockwool composite steel cladding.

2.4.5 The alteration to the existing warehouse and the ramp would be constructed alongside the warehouse.

2.4.6 The sprinkler tank would be assembled on site by overlapping and bolting galvanised steel panels. The tanks are then sealed with mastic or a rubber membrane in conjunction with a roof cover.

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 site is ideally located for the production of wood-based board due to the presence of the railway head within the site which is connected to the Chester to Shrewsbury rail line. The railway head enables the delivery of round wood to the site via rail and therefore reduces the reliance of the manufacturing 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 There is currently insufficient storage on the Site. 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 more storage available to it on the Site itself.
- 3.1.4 Kronospan is currently providing a valuable service to its customers, which it would like to maintain and improve. The relative lack of storage at the Site has led to the need to source off-site storage. Notwithstanding the operational difficulties, this increases both rental and transport costs. Issues such as security and reliability increase with not having full control over storage.
- 3.1.5 Resolving these issues is important, and off-site storage is not considered to be a long-term solution for the business. Improving facilities on the Site will ultimately secure existing and future business and existing jobs.

3.2 Environmental Benefits

- 3.2.1 Over several years Kronospan has implemented projects aimed at further improving environmental conditions at the 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 there is a potential improvement to nearby receptors to the east. This is because the proposed warehouse would act as an aural screen for noise generated from the remainder of the site for those properties to the east, along Holyhead Road. The noise generated within the warehouse would be relatively minor as there would be no manufacturing undertaken within the building. The insulation of the building would also help to mitigate noise impacts. Overall the development would result in reduced noise levels experienced at properties along Holyhead Road from the Kronospan Facility.
- 3.2.3 Whilst there will be some loss of vegetation during the construction phase, the landscaping proposals will result in an overall increase in tree numbers. The Proposed Development also includes measures to improve the biodiversity in the northern and eastern parts of the Site.
- 3.2.4 The Proposed Development would also remove the need for some trips from the Site to separate storage facilities, and then back to be distributed to customers.

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 original 17th Century farmhouse still forms part of the offices of Kronospan. The site at Chirk was chosen because of its central location between its main customer base and its plentiful supply of raw materials.
- 4.1.2 The construction of the first factory building commenced in 1971 and the company began operating in 1973. In the late 1980s, the company bought the factory next door and this has since been extended to provide the base for the company's *Kronoplus* operation, which produces laminate flooring and worktops.
- 4.1.3 Over the past 5 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 2.1 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,	Approved - 07 May 2014

Application Ref. No.	Proposal	Decision
	recycled wood fibre offloading & screening facility, biomass 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	Refused – 5 September 2016 Granted at Appeal – 4 May 2017 (Reference APP/H6955/A/16/3165368)

Application Ref. No.	Proposal	Decision
	ventilation system, hydraulic oil and diesel storage tanks, a vehicle filling station, garage service building and other associated infrastructure.	
P/2016/0534	Proposed building extension to store medium density fibreboard (MDF) and chipboard.	Refused – 05 September 2016
P/2017/0416	Replacement of existing wood chip preparation facility and development of a new wood chip dryer and associated equipment.	Approved – 31 July 2017
P/2017/0700	Development of a raw board store	Refused – 6 November 2017 Granted on Appeal – 22 May 2018 (Reference APP/H6955/A/18/3193142)
P/2017/0699	Development of a log delivery and transfer system and buildings to house a replacement wood chipping and flaking system and demolition of existing debarking and chipping facilities.	Granted – 1 May 2018
P/2018/0551	Planning Application for the development of an orientated	Granted on Appeal (against non-

Application Ref. No.	Proposal	Decision
	strand board production facility	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

- 4.1.4 A further planning application, which was the subject of a planning appeal, is of relevance. On 24 January 2002 an appeal was dismissed for the “Erection of a warehouse extension opposite Ferro building”. The planning application had previously been refused by the Council on 12 March 2001. The decision itself forms Appendix F.
- 4.1.5 The appeal decision discussed the effect of the development upon the character and appearance of the area and the amenity of neighbouring properties.
- 4.1.6 Both the planning policy and the characteristics of the Site were different when this decision was made. The development plan at the time consisted of the Clwyd County Structure Plan First Alteration and the Glyndwr District Local Plan, and neither document nor Council exist today. The Site was allocated for employment but there was a specifically defined area identified on the Proposals Map as a “landscaped buffer area”, which was intended to screen the Facility. It was specified that buffer area should be “densely planted as part of the overall landscaping scheme for the site”. The

Proposals Map has not been located but based on the appeal decision the proposed warehouse was due to be on much of the northerly planted buffer area.

- 4.1.7 Although the previous policy documents and the Proposals Map have not been located, it is clear from the appeal decision that the landscaping was much less extensive and established than today:

“At present only a part of the allocated buffer area has been laid out as a densely planted area...The mound affords some screening of the factory premises to the west and the screening provided is likely to improve as the trees and shrubs develop.”

Paragraph 7

- 4.1.8 Paragraph 8 of the appeal decision describes that trees behind where the bund now lies were visible from Holyhead Road (including the TPO protected trees). The inspector’s concern was that the landscaping that was proposed would appear somewhat artificial as a barrier between Holyhead Road and the Facility as it was in 2001, and would be out of character.

- 4.1.9 Since this decision, both planning policy has changed and there is not a specifically defined area on the current Proposals Map for a landscaped buffer area. This is likely to be because the existing bund and landscaping have been in place for many years and successfully screen the development. The concerns raised by the Inspector in 2001 are not considered to still apply: the dense landscaping currently provides a screen to restrict views from the east. Therefore, whilst any previous planning decision is a material consideration the weight that can be afforded to the appeal decision is considered to be low given the changes to policy and the characteristics of the Site have changed considerably since then.

- 4.1.10 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; and
- Circumstances have changed since a previous planning application to erect a warehouse in the north-east of the Site.

5.0 ENVIRONMENTAL EFFECTS

5.1 Introduction

- 5.1.1 The proposed warehouse (and ancillary works) would be located within the north east part of the existing built area of the Kronospan site.
- 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 Significantly, the Proposed Development would be introduced into 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.
- 5.2.4 The locations from where the Proposed Development would be visible from cannot be separated from the proposed alterations to the existing bund and landscaping. The LVIA identifies viewpoints and identifies the potential impacts of the Proposed Development. This includes an assessment of the impacts on heritage assets.
- 5.2.5 The effects of the Proposed Development on these viewpoints would be limited, with none of them experiencing significant visual effects. At four of the viewpoints a minor neutral effect would occur, and a negligible effect

would occur at a further viewpoint. The Proposed Development would not be visible from the viewpoint at Chirk Recreation Ground.

5.2.6 Generally, the Proposed Development would be very well screened by a combination of landform, vegetation cover and existing structures, and as such, would not be widely visible. It is significant that the modelling was based on the level of vegetation in the winter months when the trees are not in leaf. This is considered to be a worst-case scenario and so throughout the remainder of the year the screening provided by the trees would be greater. The earth bund and the tree planting along the eastern boundary of the wider Kronospan site would provide very effective screening of views of the Proposed Development from properties located along the B5070 Holyhead Road and those along perpendicular roads such as West View. At worst only occasional views of the new building would be available from these through the trees. The existing warehouse buildings to the west and south, and existing tree cover to the north would also provide screening, and the Proposed Development would not stand out, and indeed would seldom be clearly visible.

5.2.7 Where visible (in the context of screening features), the Proposed Development would be viewed in the context of existing and larger structures already present at the wider Kronospan site. The Proposed Development would typically result in only a minor change to the arrangement of elements within the wider site. Several of the existing structures are far larger than the Proposed Development in terms of height, mass, floorspace, or all three. As such, the Proposed Development would have little or no appreciable effect upon the long-established existing influence of the Kronospan site upon views.

5.2.8 Overall, the impact of the Proposed Development would be acceptable, and hence there is no need for specific mitigation to screen it. However, additional planting is proposed to replace those trees which would be removed and to create habitat on the Site. The existing planting would further develop over time to improve the quality of the screen.

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. This includes those trees which would be removed and those which would need to be pruned to facilitate the development. The AIA considers the local and wider impact on the landscape and makes recommendations to protect and mitigate the impacts where possible.
- 5.3.2 A survey of the affected trees in accordance with BS5837:2012 (Trees in Relation to Design, Demolition and Construction) was undertaken in March 2021. Most of the trees on the bund are self-set and of limited value in their own right. Three groups of trees and 16 individual trees would be influenced by the proposal. None of these trees were classified as category A, with four being classified as B, and the remaining 15 as C. Of these, 13 individual trees and one group of 3 trees would need to be removed.
- 5.3.3 Two of the trees to be lost are the subject of TPOs. One of them is a mature Oak tree which cannot be easily seen from a public area: there are only very limited views through the existing trees to the east and over the soil bund when the trees are not in leaf. Distinguishing it against this backdrop would be very difficult. When the trees are in leaf it is unlikely that the tree could be seen. There is evidence of die back, small and sparse leaf cover and general low vitality and vigour, and there is potential for the tree to decline in the next 10 years.
- 5.3.4 The continued presence of the TPO on the mature Oak is considered questionable: the AIA provides an evaluation of the tree against recognised criteria for a TPO and finds the tree to not possess the required qualities. The other protected tree was provided as mitigation for a previous tree which was removed, and so in itself it is not a high quality specimen.
- 5.3.5 Hence, a replacement tree is proposed to be planted as mitigation. The location for this is suggested to be to the north of the warehouse where there would be space for it to grow. The precise location could be agreed with the Council as part of a landscaping scheme.
- 5.3.6 The second protected tree is also to be removed. This has been planted on the bund to mitigate the loss of another Oak tree. It is currently relatively

small. It has been explored if it can be transplanted but given that the same impact can be achieved with a replacement tree of a similar size and maturity in the north of the Site, this has been discounted. As above, the precise location could be agreed with the Council.

- 5.3.7 Additional planting is proposed to replace trees that are to be removed and to provide a net gain. The AIA recommends additional planting of native broadleaved and evergreen species (such as Hawthorn, Rowan, and Holly). A programme of thinning of existing trees on the bund would improve conditions for maturing specimens.
- 5.3.8 The Arboricultural Impact Assessment also includes a method statement to minimise potential damage to retained trees.
- 5.3.9 The replacement tree planting, and the works to improve the retained trees on the bund, would result in a greater number of trees overall.

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 west side and top of the bund consist of a mosaic of bare earth, ephemeral short perennial, tall ruderal and scrub, with a greater amount of scrub at the southern end. This is shown on Figure 1 of the Ecological Impact Assessment. The habitat loss affects widespread and commonly occurring vegetation on a bund which has been created as opposed to have formed naturally. The trees, scrub and hedgerows outside of the development footprint would be protected during construction.

- 5.4.3 The bund has potential as habitat for some protected and notable species to varying extents. There is limited potential for nesting birds to be supported, but it is recommended that vegetation is removed outside of the bird breeding season, with suitable measures in place to ensure that nesting birds are not disturbed. In addition, bird boxes are proposed.
- 5.4.4 The oak tree which is subject to a TPO has moderate potential to support roosting bats, but otherwise there is low suitability as habitat for foraging and commuting habitat. Further detailed inspection / survey of all trees scheduled for removal is recommended to take place before tree works are undertaken. If roosting is confirmed then suitable mitigation would be put in place. There is already a bat box on the Site, which was required as part of a previous development, but further provision is proposed.
- 5.4.5 The Assessment considered other species. No badger setts were identified but they are considered likely to be present locally. A pre-construction check is recommended and if evidence of badgers is identified then suitable mitigation would be provided. In any event good practice measures would be incorporated into the construction as a precaution. The habitat on the Site is not considered suitable for hazel dormouse, otter, water vole, or reptiles. There are no waterbodies on the part of the Site where the development would be located. The habitat is not considered to be suitable for other species.
- 5.4.6 The proposal includes provision for habitat creation, to add value to the existing Site. This includes the planting of suitable species as shown on the accompanying drawings. This includes the planting of a greater number of trees than are proposed to be removed. In addition to the quantity of habitat the works to the existing trees and vegetation on the bund described in Section 5.3 above would ensure their longevity, which contributes to the quality of the habitat.
- 5.4.7 Overall, the Proposed Development includes measures which would 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 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 Site has also been considered.
- 5.5.4 The warehouse facility would generate contributory noise levels of between 4dB and 26dB during daytime and night-time periods at the nearest sensitive receptors. This is a range rather than noise levels being louder at night. The receptors have been identified around the Site and provide a representation of the noise impacts. The noise generated by the Proposed Development would be less than the existing background noise levels. The noise from the proposed warehouse would not have unusual noise characteristics: within the warehouse noise would largely result from the movement of goods by mobile plant (such as forklift trucks). Noise from road traffic would largely be unchanged.
- 5.5.5 It is expected that the Proposed Development would result in a general reduction in the overall noise levels at the Kronospan Facility experienced from the east and north-east. This is due to the warehouse having a screening effect.
- 5.5.6 It is recommended that the cladding proposed for the building is suitable, and the intended material is considered appropriate. 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.

- 5.5.7 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 Site.

5.6 Drainage

- 5.6.1 The planning application is accompanied by a Surface Water Drainage Strategy (Appendix E). The Strategy includes the necessary pre-application form for the Sustainable Urban Drainage Systems (SuDS) Approving Body (SAB).
- 5.6.2 As existing, the surface water from the entire installation with the exception of the Particle Board Pre-production area, drains to two lagoons which are situated on the northern boundary of the Site.
- 5.6.3 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.
- 5.6.4 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 RCF 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); and
- Oriented Strand Board (OSB) Facility (Not yet commenced).

6.1.2 These 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 / will 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 site operations, less potential for fugitive dust emissions, and some reduction in vehicle trips. The Proposed Development has more of a connection with trees and ecology than the previous applications, given the impact on the bund and existing trees. Hence, a cumulative assessment is limited to noting the potential for an enhancement and that the visual screen provided by the vegetation would remain and be reinforced by the landscaping.

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, will enable 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 this proposal the conclusion is that there would be no significant adverse cumulative effects would arise from the construction and operation of the warehouse and ancillary works. 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) 10: Tree Preservation Orders (1997)
- 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 on the eastern side of the Site. The Green Barrier and Special Landscape Area designations are to the west, in excess of 300m from where the warehouse would be.

7.3.5 To the east there are considerations of nature conservation and townscape, where the development partially extends on to the existing bund, but 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 site will be to provide improvements 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. The land where the overwhelming majority of the proposed warehouse would be sited consists of hardstanding which is used for the storage of equipment associated with the wider site. Although the

warehouse would extend partially on to the area where there is currently a bund and soft landscaping this would only be a relatively small area, and this land is within the curtilage of the Kronospan site which is all classified as previously developed land. The proposed amendment to the Proposals Map as part of the draft Local Development Plan is considered to add further weight to this. This is detailed below but in summary the draft Proposals Map draws the boundary of the employment area to the edge of Holyhead Road, so including the bund and verge.

- 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 warehouse would be 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 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.*
- *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 Site 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. There is a long term strategy for landscaping which Kronospan takes seriously. Their continued stewardship over the Site will ensure that both existing and proposed landscaping is managed appropriately.

- 7.3.18 As described within Section 2 the materials used in the construction of the Proposed Development would reflect the existing built infrastructure at the Site. The walls and roof would be clad with galvanised steel sheeting. The proposal is for the external cladding to the east and north sides to be Olive Green in colour, which would allow the building to sit well against the backdrop of the trees and vegetation of the bund. 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.
- 7.3.19 The public transport links have been referred to above, and being within the settlement boundary of Chirk inherently means that the Site is well located to allow people to walk and cycle to and from it.
- 7.3.20 The Proposed Development would provide an overall improvement in terms of noise emissions, with potential to improve air quality. The warehouse would help to screen noise generated on the Site, so reducing potential for noise at receptors to the east. The current open storage would be removed so reducing the potential for fugitive dust emissions.
- 7.3.21 The impact on nature conservation has been considered carefully, and the proposed alterations to the bund and landscaping have been demonstrated to be acceptable within the appended documents. The replacement landscaping would ensure that there is no net loss of habitat, and actually a net benefit.
- 7.3.22 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 Site and with the addition of the Proposed Development.
- 7.3.23 Kronospan is the 9th largest manufacturer in Wales¹ 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

¹ Research compiled by the University of South Wales Business School: <https://www.business-live.co.uk/economic-development/biggest-firms-wales-19439338>, Accessed 9 July 2021

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.

- 7.3.24 In light of the foregoing the Proposed Development is considered to accord with Policy GDP1.

Policy EC6: Biodiversity Conservation

- 7.3.25 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.

- 7.3.26 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.

- 7.3.27 As noted above the impact on the area of soft landscaping on the eastern edge of the Site is acceptable. It can be concluded that the Proposed Development would not result in any harm, directly or indirectly, to sites of biodiversity interest. In light of the foregoing, there is not considered to be any conflict between the Proposed Development and Policy EC6.

Policy EC7: Conservation Areas

- 7.3.28 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.
- 7.3.29 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 screened from view by landscaping.

- 7.3.30 On this basis it can be concluded that the Proposed Development would not be contrary to Policy EC7.

Policy EC4: Hedgerows, Trees and Woodland

- 7.3.31 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.

- 7.3.32 The proposal would result in the loss of some trees. This includes two trees which are the subject of TPOs, and a number of other trees near to the eastern boundary of the site. There would be replacement tree planting which would be of at least equal value in terms of screening the Site from public and private vantage points. The loss of the protected trees has been shown to be acceptable within the accompanying Arboricultural Impact Assessment.

Policy EC13: Surface Water Run-Off

- 7.3.33 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 have been demonstrated to be acceptable.

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

- 7.3.34 This policy confirms that employment development proposals on unannotated land within settlements will be permitted provided that the proposal accords with Policy GDP1.

- 7.3.35 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)

- 7.3.36 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.
- 7.3.37 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.
- 7.3.38 The Plan was submitted to the Welsh Government and the Planning Inspectorate on 30th November 2018, but it was only officially acknowledged as being received on 18th April 2019. Hearings were held into the Plan in September and October 2019. Since then there has been correspondence between the Council and the Planning Inspectorate, which has been restricted to housing, in particular the gypsy and traveller accommodation site assessment and selection process.
- 7.3.39 The emerging Development Plan is at an advanced stage of its preparation. Given that the policies which remain under discussion relate to housing, due

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.

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

7.3.40 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”.

7.3.41 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*.

7.3.42 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.

7.3.43 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.

7.3.44 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.

- 7.3.45 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.
- 7.3.46 The draft Proposals Map shows the boundary of the Chirk Industrial Estate. The eastern edge of the boundary has been drawn to the western edge of the carriageway of Holyhead Road but it specifically excludes the supermarket on Holyhead Road. Therefore, the existing bund and the area of soft landscaping between it and Holyhead Road is designated employment land.
- 7.3.47 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.
- 7.3.48 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.
- 7.3.49 The policy and objectives centred on Economy and Employment therefore add weight to the policy support for the Proposed Development..

Natural Environment

- 7.3.50 Strategic Objective SO9 seeks to: “*Protect, manage and enhance the natural and historic environment and landscapes*”.
- 7.3.51 Policy SP15 *Natural Environment* requires development to “protect, conserve and enhance the natural environment”.
- 7.3.52 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.

- 7.3.53 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.
- 7.3.54 As discussed above the Proposed Development would result in the loss of some existing trees but would mitigate this through additional tree planting that responds to the nature conservation characteristics of the site. This is assessed in detail in the accompanying AIA. The trees which are to be removed are mostly self-set and of limited value in their own right. The two trees which are protected by TPOs have different characteristics, with one being a mature Oak tree and the other being a less mature Oak which was planted as mitigation for a previous tree. Policy NE3 refers to avoiding “unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural value...”. The trees to be removed do not possess “significant public amenity”. The largest, which is the protected mature oak, is assessed within the AIA and shown not to possess the qualities to be listed. Its amenity value is limited as a result.
- 7.3.55 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.
- 7.3.56 Therefore, the Proposed Development is in accordance with policies and objectives related to the natural environment.

Historic and Cultural Environment

- 7.3.57 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.
- 7.3.58 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.
- 7.3.59 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 site upon its surroundings. Neither the landscape effects nor the visual effects of the Proposed Development would be significant.
- 7.3.60 Therefore, the Proposed Development is in accordance with policies and objectives related to the historic and cultural environment.

Development Management

- 7.3.61 Policy DM1: *Development Management Considerations* sets out 12 general criteria development must fulfil, it is considered that the Proposed Development satisfies all of 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.
- 7.3.62 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, 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)

- 7.3.63 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.
- 7.3.64 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”.
- 7.3.65 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
- 7.3.66 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.
- 7.3.67 The relevant advice within these chapters of PPW is outlined below and considered in the context of the Proposed Development.
- 7.3.68 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.

- 7.3.69 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 development would not give rise to any significant adverse effects. It is clear that the Proposed Development will contribute to sustaining the valuable economic contribution that the business makes to the local and national economy.
- 7.3.70 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.
- 7.3.71 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.
- 7.3.72 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.
- 7.3.73 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.
- 7.3.74 The Proposed Development has been shown to respect both the historic and natural environment. In terms of the latter there is potential to add value to the existing habitats on the site which could be secured as part of the development.

- 7.3.75 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 development.

Conclusions

- 7.3.76 The Proposed Development would contribute to each of the national policies outlined above and it has been established that the proposals represent Sustainable Development.
- 7.3.77 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.
- 7.3.78 The overall outcome of the Proposed Development would be to provide improvements in terms of noise, negligible impacts on the historic environment, no significant effects in terms of landscape and visual impacts and enable Kronospan to secure improvements in efficiency and current employment levels.
- 7.3.79 On the basis of the foregoing it is considered that the Proposed Development is in accordance with the national planning policies set out above.

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

- 7.3.80 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.
- 7.3.81 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.
- 7.3.82 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.

- 7.3.83 The submission includes an assessment on the impact of the proposal on nature conservation, which concludes that the impact would be acceptable and that there are net benefits to accrue from the development.

Technical Advice Note (TAN) 10: Tree Preservation Orders (1997)

- 7.3.84 TAN 10 provides advice to local planning authorities on the need for a TPO. A TPO should be used to protect trees and woodlands whose removal would have a significant impact on the environment and its enjoyment by the public. Protected trees, or part of them, should normally be visible from a public place or from a reasonable number of properties nearby.
- 7.3.85 The Arboricultural Impact Assessment which accompanies this planning application includes an assessment of the tree against relevant criteria for a TPO, and it does not score highly. It is barely visible from public vantage points, and would barely be discernible from other trees on the eastern boundary of the site when viewing from Holyhead Road and the residential properties facing it. The other tree which is protected by a TPO is done so for different reasons (in this case as it was to mitigate the loss of another tree) and so a similar assessment for this tree is not merited. Instead, it is proposed to be replaced.

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

- 7.3.86 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.
- 7.3.87 TAN 11 also advises on measures to mitigate the impact of noise, which fall into three categories: engineering, layout-out, and administrative.
- 7.3.88 The Proposed Development would generate limited noise with activities taking place within the building which has limited openings, especially on the eastern elevation where it is nearest to residents. The Proposed Development would also internalise within the proposed building some of the current activities on this part of the site, and also act to reduce noise from further within the Kronospan site being audible to the east.

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

- 7.3.89 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.
- 7.3.90 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.”
- 7.3.91 The Proposed Development is a functional development that will be used for storage of products produced on the Kronospan site. 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.
- 7.3.92 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
 - easily recognisable and understood features and landmarks
- 7.3.93 The Proposed Development would be located in the eastern part of the Kronospan site adjacent to other long established, large buildings which are of a similar height and scale to the proposal. The Kronospan site forms a long 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).

7.3.94 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 Olive Green cladding on the east and north sides (subject to the agreement of WCBC) which has been selected to reduce the visual impact of the facility.

7.3.95 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 on site and so would not be prominent against the sky.

7.3.96 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 LVIA 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 Site 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)

7.3.97 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.

- 7.3.98 The planning application includes details of drainage, which shows that the level of surface water runoff would be managed on Site using the existing mechanisms.

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

- 7.3.99 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.
- 7.3.100 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”*.
- 7.3.101 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)

- 7.3.102 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.
- 7.3.103 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 LVIA considers the impact on the nearby heritage assets. Given that the Proposed Development would be on the eastern side 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)

- 7.3.104 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.
- 7.3.105 The National Plan contains strategic policies. Policy 1 identifies Wrexham as being within a National Growth Area.
- 7.3.106 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.
- 7.3.107 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.
- 7.3.108 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

- 7.3.109 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

- 7.3.110 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; species numbers, distribution and sizes, and the location of underground services.
- 7.3.111 The drawings and documents provided detail this, and demonstrate that careful consideration has been given to both the existing and proposed landscaping around the Proposed Development.

Local Planning Guidance Note No. 17 – Trees and Development

- 7.3.112 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.
- 7.3.113 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.
- 7.3.114 The issue of trees has been considered very carefully as part of the planning application, and the level of information provided is considered sufficient for the impacts on existing trees to be adequately assessed. There would be one tree and a group of three trees which are considered to fall within category B, and which are proposed to be removed. A further group of trees which may be impacted on (with some removal on the western margins) are also categorised as category B. Those trees to be removed have been shown to be poor specimens, and there would be replacements which are considered of greater value in the medium and longer term.

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

- 7.3.115 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.
- 7.3.116 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 Olive Green in colour on the east and north elevations which would 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 different colour preference for the cladding then the applicant would welcome the opportunity to discuss this and potentially agree this via a planning condition.
- 7.3.117 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

- 7.3.118 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.

- 7.3.119 The Ecological Assessment which supports this planning application is based on primary and secondary information to identify the potential for species in the east of the Site. The removal of part of the bund has been shown not to cause material harm, and the proposed mitigation would 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

- 7.3.120 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.
- 7.3.121 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.
- 7.3.122 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.
- 7.3.123 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

- 7.3.124 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.
- 7.3.125 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.

7.3.126 The Proposed Development has been shown to be responsive to its context. Although there are some trees to be removed they are not considered to be the most valuable specimens and the replacements are greater in number with the potential to be greater in quality in the medium to long term. 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 warehouse would deliver efficiencies in how the Kronospan Facility operates which ultimately reduces the miles that the products produced at the Site travel to reach the customers.
- 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 bund to the east of the proposed warehouse would be altered, but its value as a screen of the Site to the east would be maintained. Some trees are proposed to be removed, including two trees which are subject to TPOs. However, their loss has been justified within the accompanying Arboricultural Impact Assessment, and additional tree planting and habitat creation is proposed which would ensure that there is a net overall benefit in terms of the tree resource at the site.
- 8.1.4 The impact on noise would be positive, with the proposed warehouse acting as a screen, reducing the noise experienced at receptors to the east of the Site. The internalisation of the activities within the warehouse, when compared to the existing open storage, also has potential to reduce fugitive dust arisings from the Site.
- 8.1.5 Drainage has been considered and has been shown to be acceptable, and the additional habitat would reduce surface water runoff.
- 8.1.6 An assessment of the proposals 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.

8.1.7 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 proposals 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.