
KRONOSPAN, CHIRK

**PLANNING APPLICATION FOR THE DEVELOPMENT
OF A BUILDING CONTAINING 2NO. GAS ENGINES
EACH WITH A MAXIMUM ELECTRICITY GENERATING
CAPACITY OF 9.73MW, 2NO. STEAM BOILERS, ROOF
MOUNTED COOLERS, A WALKWAY BETWEEN AN
ADJACENT BUILDING AND THE PROPOSED
BUILDING, EXHAUST GAS OFFTAKE PIPES AND
STEAM PIPES FROM THE GAS ENGINE BUILDING
AND CARBON CATALYST ABATEMENT SYSTEM**

PLANNING STATEMENT

JUNE 2019

The axis logo, consisting of the word 'axis' in white, lowercase letters inside a blue square.

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FOREWORD

This document is the Planning Statement for the Proposed Development of a building containing 2no. gas engines each with a maximum electricity generating capacity of 9.73MW, 2no. steam boilers, roof mounted coolers, a walkway between an adjacent building and the proposed building, exhaust gas offtake pipes and steam pipes from the gas engine building and carbon catalyst abatement system. Natural Resources Wales issued an Environmental Permit (Reference EPR/BW9999IG/V007) for the operation of the 2no. proposed gas engines in 2015. However, Kronospan require planning permission to construct the facility.

The Proposed Development would be undertaken within the existing Kronospan manufacturing site. The Kronospan site is located on land adjacent to Holyhead Road (the B5070), Chirk and covers a total area of approximately 40 hectares.

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, planning drawings and an application validation statement.

Kronospan is an important local and national business and is the UK's leading manufacturer of high quality wood-based panels and associated products. It is the 6th largest manufacturing business in Wales and provides direct employment for over 620 people of which 90% live within 10 miles of the site. The manufacturing processes which take place at Kronospan require large quantities of heat and electricity. The high voltage electricity network in this part of Wales is sub-standard for the level of demand it is required to meet. As such Kronospan have historically only been allowed to draw approximately 55% of their total demand from the grid. In order to safeguard against the fragility of the local electricity grid, and reduce the risk of the limitations of the local grid hindering the manufacturing efficiency of the site, Kronospan have previously installed three gas engines. The existing gas engines enable Kronospan to supply up to 70% of their current total demand. The two additional engines would enable Kronospan to increase their self-sufficiency in terms of electricity supply.

The Proposed Development would contribute to the Kronospan 2020 Vision which is being implemented to maintain the sustainability of the business at the site, safeguarding the significant direct and indirect employment opportunities supported by the business.

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 installation and operation of 2no. gas engines each with a maximum electricity generating capacity of 9.73MW, hereafter referred to as the 'Proposed Development'. The Proposed Development is located at the Kronospan manufacturing facility in Chirk (hereafter referred to as the 'Kronospan site'. The Proposed Development comprises the following elements:

- removal of existing equipment;
- erection of a new building;
- installation of 2no. Combined Heat and Power (CHP) gas engines;
- installation of 2no. steam boilers;
- installation of a control room;
- installation of roof mounted coolers;
- installation of exhaust gas offtake pipes and steam pipes from the gas engine building;
- installation of carbon monoxide catalyst abatement system; and
- erection of a walkway bridge between the proposed building and an existing building.

1.1.2 In 2015 Natural Resources Wales (NRW) issued an Environmental Permit for the operation of 5no. gas engines (Reference EPR/BW9999IG/V007). By granting the permit NRW were of the view that the operation of the engines would not result in unacceptable effects on human health or the environment. Planning permission for the construction of 3no. engines was granted in January 2016 and these engines are now operational. Kronospan are now seeking planning permission for the construction of the two remaining gas engines which were granted an Environmental Permit by NRW.

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- 1.1.3 In addition to the above, 2no. existing gas turbines at the Kronospan site would be decommissioned if planning permission is granted for the Proposed Development and the Proposed Development is constructed.
- 1.1.4 The Proposed Development would be located at the Kronospan site that forms part of Maesgwyn Farm off Holyhead Road, Chirk, Wrexham. The location of the Proposed Development within the Kronospan site is shown on Drawing 2353-01-04.
- 1.1.5 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. 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.
- 1.1.6 The Proposed Development would enable Kronospan to increase their self-sufficiency in terms of energy supply, this would help prevent interruptions to the manufacturing processes and increase the efficiency of the manufacturing process.
- 1.1.7 The Proposed Development would assist Kronospan in achieving their Vision 2020 improvement program which is being implemented to maintain the sustainability of the business at the site, safeguarding the significant direct and indirect employment opportunities supported by the business.
- 1.2 Consideration of the Proposed Development in the context of The Developments of National Significance (Wales) Regulations 2016 (as amended)**
- 1.2.1 Currently, the electricity generating equipment at the Kronospan site comprises 3no. gas engines and 2no. gas turbines. The generating capacity of the 3no. existing gas engines is 29.19MW and the generating capacity of the existing gas turbines is 12MW. Accordingly, the total existing generating capacity at the Kronospan site is 41.19MW.
- 1.2.2 The gas turbines are for the purposes of standby/backup only and would be removed prior to the construction of the Proposed Development being completed.

1.2.3 The Proposed Development would have a total generating capacity of 19.46MW. Once the construction of the Proposed Development is completed, the gas turbines would be decommissioned. Accordingly, the total generating capacity of the Kronospan site would be the sum of the 5no. gas engines (3no. existing and 2no. proposed gas engines) which would be 48.65MW. As such, the Proposed Development would result in an overall increase in the generating capacity at the Kronospan site of 7.46MW.

1.2.4 Regulation 3(1) of The Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016 (as amended) specifies the development types which are of national significance for the purposes of section 62D(3) of The Town and Country Planning Act 1990.

1.2.5 One of the development types, which is listed at Regulation 3(1)(a), is *“the construction, extension or alteration of a generating station that generates electricity.”* Accordingly, the Proposed Development has been considered in the context of The Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016 (as amended)

1.2.6 Regulation 4 provides the specified criteria for generating stations and states:

“(1) The construction of a generating station is within regulation 3(1)(a) only if the generating station is expected to have (when constructed) an installed generating capacity of between 10 and 350 megawatts.

(2) The extension or alteration of a generating station is within regulation 3(1)(a) only if the effect of the extension or alteration is expected to increase the installed generating capacity by at least 10 megawatts, but not so that the installed generating capacity exceeds 350 megawatts.

(3) In this regulation—

“generating station” (“gorsaf gynhyrchu”) means a station, plant or buildings that generate electricity but does not include an onshore

wind generating station nor a facility that generates electricity from stored energy;

“installed generating capacity” (“gallu cynhyrchu gosodedig”) means the maximum capacity of electricity generation (in megawatts) at which that generating station could be operated for a sustained period without damage being caused to it (assuming the source of energy used to generate electricity is available without interruption).”

(emphasis added)

1.2.7 The Proposed Development comprises an extension to an existing generating station and the effect of the extension to the existing generating station would be to increase the installed generating capacity by 7.46MW. The increase in generating capacity would be less than 10MW and, as such, Regulation 4, Article 2 (quoted in bold at paragraph 1.2.6) is relevant. The Planning Inspectorate has also confirmed this interpretation of Regulation 4 Article 2.

1.2.8 In light of the above, the Proposed Development does not comprise a development of national significance. Instead, the planning application for the Proposed Development is required to be made to the Local Planning Authority (this application).

1.3 Scope of the Planning Application

1.3.1 The planning application comprises the following main elements:

- Planning Application Form and Certificates;
- Application Validation Statement;
- Planning Statement and supporting studies comprising;
 - a Noise Assessment;
 - a Landscape, Visual Impact Assessment; and
 - an Air Quality Assessment
- Planning Application Drawings.

1.3.2 Developers are required by the Planning (Wales) Act 2015 to carry out statutory pre-application consultation on planning applications for major developments in Wales. Major development is defined by The Town and

Country Planning (Development Management Procedure (Wales) Order 2012. According to this definition, the Proposed Development is not major development as the floor space of the building proposed is less than 1000m² and the site area is less than 1 hectare. As such, statutory pre-application is not required in relation to the Proposed Development.

1.3.3 The Proposed Development is not major development and is not located within a conservation area or World Heritage Site. As such, in accordance with the requirements of The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended), this planning application does not need to be accompanied by a design and access statement.

1.3.4 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 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.

1.4 Environmental Impact Assessment Screening

1.4.1 The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 prescribe the types of development for which an Environmental Impact Assessment (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).

1.4.2 The first potentially relevant category is Schedule 2 paragraph 3 Energy Industry (a) Industrial installations for the production of electricity, steam

and hot water (unless included in Schedule 1). However, the development does not exceed the relevant area threshold of 0.5ha.

- 1.4.3 The second potential category that the Proposed Development could be captured by is paragraph 13(a) Changes or extensions to an existing Schedule 1 project. In this instance an industrial plant used for the production of paper and board (i.e. paragraph 18 of Schedule 1). By virtue of falling within this category it is necessary to consider if the development as a whole (i.e. the entirety of the Kronospan site) as changed or extended may give rise to significant adverse effects on the environment.
- 1.4.4 A request for a screening opinion was made under Regulation 31 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 on 8th September 2018 at a point when the project was potentially considered to comprise a Development of National Significance. The request for a screening opinion is contained in Appendix A). A Screening Direction (contained in Appendix B) was provided by the Welsh Ministers on 16th October 2018 which confirmed that the Proposed Development does not require an EIA.
- 1.4.5 Furthermore, a number of environmental 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 and visual, air quality 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.

1.5 The Site & Its Context

- 1.5.1 The Proposed Development is the installation and operation of 2no. gas engines within the Kronospan site in Chirk. The location for the Proposed Development is within the existing Kronospan site and is shown on Drawing 2353-01-04. The Kronospan site is located on land adjacent to Holyhead Road (the B5070), Chirk and covers a total area of approximately 40 hectares.
- 1.5.2 The proposed new building would be located within the south-western portion of the Kronospan site, to the north of the MDF/particle board

production buildings. This area of the Kronospan site accommodates a number of large industrial process facilities including several tall structures, such as stacks, that emit abated process emissions to the atmosphere.

- 1.5.3 The new building would be located adjacent to, and to the west of, the existing gas engines building. A 6m long walkway bridge would connect the existing and proposed gas engines buildings at the first floor. The existing gas engines building contains three steam boilers, an associated electrical substation building, and a bunded oil tank compound which houses two oil tanks and oil pumping equipment and associated infrastructure.
- 1.5.4 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 and cumulative developments. The tallest structure on the site is the combined heat and power (CHP) biomass plant stack which is 70m in height.
- 1.5.5 A number of process buildings are located in the northern half of the site including: a saw mill; formalin plant and the secondary product manufacturing facility (Kronoplus) which produces laminate flooring and worktops.
- 1.5.6 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.
- 1.5.7 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.

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- 1.5.8 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.
- 1.5.9 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 east of the site and parts of the town centre are designated as Chirk Conservation Area.
- 1.5.10 The wider area beyond the urban settlement of Chirk is dominated by agricultural fields and woodland. Chirk Castle (Grade 1 listed) and its grounds (Registered Park and Garden) are located circa 500m to the west of the 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

- 1.5.11 The Proposed Development will not result in any change to the existing site access arrangements.
- 1.5.12 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.
- 1.5.13 The existing railhead and sidings within the site are used to import timber for the manufacturing process as well as import via HGV.

1.6 The Applicant

- 1.6.1 The Applicant is Kronospan Limited. It is the UK's leading manufacturer of high quality wood-based panels and associated products and has been operating in the UK since 1970. 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.
- 1.6.2 The Kronospan site is a major local employer within Wrexham County Borough (WCBC) with the site at Chirk employing 620 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.

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 A plan view and elevations of the Proposed Development are shown on Drawing no. 2353-01-02.

2.2.2 The planning application covers a total area of 812.7m².

2.2.3 The Proposed Development comprises the following elements:

- removal of existing equipment;
- erection of a new building;
- installation of 2no. gas engines;
- installation of 2no. steam boilers;
- installation of a control room;
- installation of roof mounted coolers;
- installation of exhaust gas offtake pipes and steam pipes from the gas engine building;
- installation of carbon monoxide catalyst abatement system; and
- erection of a walkway bridge between the proposed building and an existing building.

2.2.4 The proposed building that would house the gas engines is 19.3m high (the same height as the building which accommodates the existing gas engines), 24.7m in length and 11.8m wide. The gas engines would be located on the ground floor and the steam boilers on the first floor. A series of air cooling fans would be located on the roof of the building along with emergency steam release pipes and other ancillary infrastructure. Offtake pipes for steam and exhaust gases would lead from the main building to other parts of the manufacturing site. An external staircase would provide access to the

two floors of the building and the bank of cooling fans on the top of the building.

- 2.2.5 A series of large diameter pipes would exit from the building and would be used to transfer hot exhaust gasses and steam to the manufacturing facility. The proposed gas engines would be connected to the existing substation approved under planning permission P/2015/0728.
- 2.2.6 The Proposed Development would connect to the existing on-site gas and surface water drainage connections.
- 2.2.7 The elevations of the Proposed Development are shown on Drawing no. 2353-01-02. A series of photomontages are contained in Appendix C that illustrate the Proposed Development from a number of key locations in the vicinity of the site.
- 2.2.8 The proposed external material colour for the Proposed Development is RAL 7038 Agate Grey. This colour is a similar grey colour to the surrounding structures and would reduce the visual impact of the Proposed Development.

2.3 Proposed Development Operations

- 2.3.1 The gas engines would be supplied with natural gas from an existing main which supplies the existing gas engines. The natural gas would be combusted to generate electricity which would be distributed throughout the Kronospan site from the electrical substation.
- 2.3.2 The hot gases arising from the operation of the engines would be transferred to the boilers located on the first floor of the building where they would be used to produce steam. This steam would then be transferred to manufacturing buildings within the Kronospan site to be used in the manufacturing process. Heat would also be recovered from the gas engines and would be used to pre-heat the water in the boilers. Under normal operating conditions, heat from the exhaust gases would be sent to the MDF dryers to assist in the MDF drying process, these emissions would then be emitted via the existing stacks servicing the MDF dryers. Accordingly, the engines would be extremely efficient, maximising the

energy derived from the combusted gas for use within the on-site manufacturing operations.

- 2.3.3 Both the proposed and existing gas engines are included within a current environmental permit covering chemical operations and combustion plants, this has been issued by Natural Resources Wales (NRW) (Reference EPR/BW9999IG/V007).

2.4 Construction

- 2.4.1 The construction of the new gas engines building and installation of the gas engines would comprise the following stages:

- Removal of existing equipment;
- Site preparation;
- Constructing foundations;
- Building and steelwork erection;
- Installation of new gas engines and associated equipment;
- Installation of fire detection and protection systems;
- Cladding and painting; and
- Testing and commissioning the gas engines.

3.0 NEED AND BENEFITS OF THE SCHEME

- 3.1.1 The Proposed Development is part of an ongoing development programme to deliver environmental improvements at the site, improve the efficiency of the operations and to ensure the long term economic viability of the manufacturing facility.
- 3.1.2 The primary products manufactured at the 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 (MF). A planning application for a development which would introduce a third raw board process to the site for the production of Oriented Strand Board (OSB) is currently subject of an appeal against non-determination by the Local Planning Authority.
- 3.1.3 The manufacturing processes which take place at Kronospan require large quantities of heat and electricity. The high voltage electricity network in this part of Wales is sub-standard for the level of demand it is required to meet. As such Kronospan are only licensed to draw approximately 55% of their total demand from the grid.
- 3.1.4 In order to safeguard against the fragility of the local electricity grid, and reduce the risk of the limitations of the local grid hindering the manufacturing efficiency of the site, Kronospan have previously installed three gas engines. The existing gas engines enable Kronospan to supply up to 70% of their current total demand. The two additional engines would enable Kronospan to increase their self-sufficiency in terms of electricity supply. By becoming more self-sufficient, Kronospan can reduce the risk of interruptions to the manufacturing processes and thereby increase the efficiency and productivity of the site.
- 3.1.5 The Proposed Development would contribute to the environmental efficiency of operations at the manufacturing site by using the heat from the gas engines in the manufacturing process. The Proposed Development would contribute to the Kronospan 2020 Vision which is being implemented to maintain the sustainability of the business at the site in Chirk, safeguarding the significant direct and indirect employment opportunities supported by the business.

4.0 PLANNING HISTORY

4.1 Introduction

- 4.1.1 Prior to the 1970s, the site was greenfield agricultural land and included a farm house. 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 The site has a long and complex planning history, therefore only the larger/noteworthy applications have been included in the table below (e.g. planning applications for signage or canopies over storage areas for example have not been included).

Table 4.1 Planning History

Application Ref. No.	Proposal	Decision Date
9/1459	Erection of a factory for the manufacture of particle board together with timber storage, accommodation, kiln, offices with flats over and other ancillary buildings, provision of car parking facilities and enlargement of existing access.	4 August 1970
9/1534	Outline application for the development of land by the erection of a factory for the	16 August 1971

Application Ref. No.	Proposal	Decision Date
	manufacture of particle board and alterations to existing access.	
9/1534/1	Details of the factory for the manufacture of particle board and plastic faced particle board and alterations to existing access.	29 October 1971
9/1549	Use of existing dwelling as office accommodation in association with proposed factory development.	10 September 1971
9/1884	Details of warehouse for the storage of finished particle board submitted in accordance with Condition No.2 of planning permission 9/1534.	29 March 1974
4/472	Relocation of an existing warehouse.	15 January 1975
4/1798	Extension of existing factory for the manufacture of particle board.	17 December 1976
4/1799	Erection of a new warehouse.	12 April 1977
4/2690	Erection of new flanker building and associated wood chipping machinery.	25 July 1978
4/2843	Extension to warehouse with garage and vehicle inspection pit.	3 October 1978

Application Ref. No.	Proposal	Decision Date
4/5288	Erection of building to house new waste material boiler.	8 April 1982
4/5913	Proposed construction of a pre-drier unit (for the pre-drying of wood chips).	30 November 1982
4/6500	Proposed erection of a formaldehyde plant at existing factory.	29 November 1983
4/6690	Proposed extension to existing factory to provide a new particle board press line.	29 November 1983
4/6737	Proposed extension to existing warehouse to provide additional storage accommodation.	17 January 1984
4/7217	Proposed extensions to existing factory to provide a 4th particle board press line and 5th melamine press with additional warehousing facilities and extensions to canopies over loading bays and re-siting of gatehouse.	21 December 1984
4/7554	Proposed erection of plant in the form of a stack, 16m high above the level of factory roof for the collection and exhaust of fumes from the drying ovens.	7 November 1985

Application Ref. No.	Proposal	Decision Date
4/7724	Proposed construction of a new substation to increase electrical capacity to pre-production area.	1 October 1985
4/7747	Proposed installation of incinerator to deal with the formaldehyde plant tail gases.	6 December 1985
4/8926	Proposed installation of 7.55MW boiler and erection of a 52m high chimney.	16 October 1987
4/8970	Proposed construction of 52m chimney to serve existing wood chip drying plant (no. 3 drier).	13 May 1988
4/11904	Proposed installation of medium density fibreboard plant comprising a refiner building, tube drier, sifter, a forming station and in the existing building a new production line and the installation of abatement equipment in the form of an electrostatic fluidised bed (EFB) system to filter emissions from the weiss boiler and the no. 1 Babcock drier.	7 July 1993
4/13976	Erection of sawmill incorporating log in-feed	13 July 1994

Application Ref. No.	Proposal	Decision Date
	conveyor, de-barker, chipper line, hoggers, cantor chippers, trimmer, profile units, screen units and saws, saw sharpening and tool assembly workshop and stores, plant sorting and stacking unit for the manufacture of timber planks and wood chips (partly retrospective).	
CB01264	Turbine hall extension including 35m high stack.	6 April 1998
CB02609	Amended application for 4 cyclones for MDF II	10 November 1998
CB02899	Erection of new warehouse.	8 March 1999
CB3633/HS	Deemed Hazardous Substance Consent.	29 October 1999
P/2012/0165	Development of biomass plant, recycled wood fibre (RCF) offloading & screening facility & associated infrastructure to support existing production operations	Approved - 14 September 2012
P/2013/0824	Development of biomass plant comprising biomass boiler & furnace ash, handling facility & flue, gas treatment facility including stack & air pollution control, reagent storage silos, recycled wood fibre offloading	Approved - 07 May 2014

Application Ref. No.	Proposal	Decision Date
	& 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 02 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 - 04 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 – 03 May 2016
P/2016/0336	Extension of a building to house a new melamine facing (MF) press, following the demolition / relocation of the existing MF department's ventilation system, hydraulic	Refused – 05 September 2016 Granted at Appeal – 04 May 2016 (Reference APP/H6955/A/16/3165368)

Application Ref. No.	Proposal	Decision Date
	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/2017/0699	Development of a Log Offloading Facility and Flaker Facility and Refurbishment of the Existing Chipper	Approved – 10 May 2018
P/2017/0700	Development of a Raw Board Store.	Refused – 06 November 2017 Granted at Appeal – 22 May 2018 (Reference: APP/H6955/A/18/3193142)
P/2018/0551	Development of An Orientated Strand Board Production Facility	Submitted – 06 July 2018 Subject to appeal Reference: APP/H6955/A/19/3227571

4.1.4 In conclusion, the planning history identifies that:

- The Kronospan site has been developed since the 1970s;

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- The site has a long history of planning consents for large industrial development;
 - There have been a number of planning applications from 1999 through to 2018 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; and
 - Several applications have recently been submitted and approved for projects included in the Kronospan Vision 2020 strategy.

5.0 ENVIRONMENTAL EFFECTS

5.1 Introduction

5.1.1 The Proposed Development is located within the existing built area of the Kronospan site, amongst a number of existing structures. The location of the Proposed Development is shown on Drawing 2353-01-04.

5.1.2 Based on the feedback received through pre-application discussions and during the determination of other planning applications submitted in recent years as part of the Kronospan Vision 2020 program, the following environmental assessments have been undertaken to support the planning application:

- Landscape and Visual Impact Assessment (Appendix C);
- Noise Assessment (Appendix D); and
- Air Quality Assessment (Appendix E)

5.1.3 As the proposed location of the facility is within the existing developed area of the site it would avoid any direct effects on ecology. The Proposed Development would not increase the impermeable area of the site and therefore would not result in any adverse effects on flood risk or drainage. The Proposed Development would not give rise to any changes in the number of vehicle movements associated with the Kronospan site and therefore a Transport Assessment has not been completed.

5.1.4 The following sections summarise the findings of the detailed environmental assessments that are appended to this Planning Statement.

5.2 Noise

5.2.1 A detailed noise assessment is provided in Appendix D.

5.2.2 The noise assessment has been completed using baseline sound level data to establish any potential noise impact on the nearest sensitive receptors which would result from the Proposed Development.

5.2.3 The assessment identifies that the Proposed Development would not cause any increase in existing noise levels and therefore that there would not be

any increase in cumulative noise experienced at the noise sensitive receptors.

5.2.4 The noise from the operation of the proposed gas engines and associated plant would result in noise levels complying with all relevant standards at the nearest sensitive receptors (i.e. according to BS4142: 2014).

5.2.5 On this basis it is concluded that noise levels from the Proposed Development, when considered in isolation and cumulatively with the noise levels from the existing plant and other proposed development at the Kronospan site, would be acceptable.

5.3 Landscape and Visual

5.3.1 Appendix C contains a Landscape and Visual Impact Assessment (LVIA). 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.

5.3.2 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.

5.3.3 The LVIA has concluded that the Proposed Development would be well screened by a combination of landform, vegetation cover and existing structures at the Kronospan site, and as such, would not be widely visible. Where visible, the Proposed Development would be viewed in the context of existing and larger structures already present at the Site. The Proposed Development would typically result in only a very minor change to the arrangement of elements within the wider site, and would be difficult to discern as a separate or distinct feature. Many of the existing structures would appear appreciably 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. Visibility

from the World Heritage Site and from the Chirk Castle estate would be very limited (refer to Viewpoints I, L, M & N in Appendix C) and would not affect the experience of visitors to these features.

5.4 Air Quality

5.4.1 NRW granted an Environmental Permit (Reference EPR/BW9999IG/V007) for the three existing engines and additional two proposed engines in 2015.

5.4.2 Appendix E contains an Air Quality Analysis undertaken by Fichtner Consulting Engineers. This analysis sets out the impact on local air quality of the operation of the proposed additional two gas engines in combination with other sources on the Kronospan site.

5.4.3 The exhaust gases from the CHP gas engines will be used within the Medium Density Fibreboard (MDF) driers and under standard circumstances operations would vent to atmosphere via the MDF cyclones. The proposed additional two CHP gas engines would not change the number of emission sources on site because emissions from the proposed gas engines would be emitted from the same points as the existing engines i.e. the existing stacks serving the MDF driers. If either of the MDF driers are offline, the power and heat demand for the Kronospan manufacturing facility would be reduced and the number of CHP gas engines needed would be reduced, whilst ensuring a commercially viable approach is maintained.

5.4.4 In terms of the number of sources on site the worst-case is if the MDF 2 drier is offline. In this case, the exhaust gases from two CHP gas engines could be used in the MDF 1 drier but the exhaust gases from the other CHP gas engine (which would be needed to provide the power for elsewhere on site) would vent to atmosphere via its own dedicated stack. This would be the case irrelevant of whether there are three CHP engines (as currently on site), or the proposed total of five CHP gas engines in operation. Therefore, the Proposed Development would not lead to any material change in air quality impact from the sources feeding the MDF driers, other than that currently occurring on site.

5.4.5 Natural Resources Wales (NRW) have already issued an Environmental Permit (EP) which allows these additional CHP gas engines to operate. In

issuing an EP, NRW deem that the impact is acceptable to the local environment and human health in isolation and together with the other sources on the Kronospan site and in the local area. In addition, planning application (P/2018/0551) which is currently subject to an appeal against non-determination (Reference APP/H6955/A/19/3227571) included for the operation of five CHP gas engines. This demonstrated that even for the 'worst-case' emissions scenario there is not predicted to be any exceedance of an Air Quality Assessment Level (AQAL) at any area of relevant exposure and the impact on ecological sites is deemed to be not significant.

5.5 Heritage

- 5.5.1 The LVIA confirms that visibility of the Proposed Development from the Pontcysyllte Aqueduct and Canal World Heritage Site and Scheduled Monument, and from the Chirk Castle estate would be very limited and would not affect the experience of visitors to these features. As such a formal cultural heritage appraisal has not been completed.
- 5.5.2 Nonetheless, cultural heritage assessments have been completed to support planning applications recently made by Kronospan with regard to other, larger developments (For example, the proposed Orientated Strand Board Production Facility [subject to appeal reference APP/H6955/A/19/3227571] and the Raw Board Store [granted at appeal 22nd May 2018]). The cultural heritage assessments completed to inform previous planning applications have identified that where the development identified above would be visible from the local cultural heritage resource, they are largely screened and would be experienced within the large area of buildings that make up the existing manufacturing complex. The visual impacts of the developments identified above were found not to increase the visual impact of the complex. The cultural heritage assessments for the Orientated Strand Board Production Facility and the Raw Board Store, concluded that the construction and operation of those developments would have no impact upon either the heritage significance of the Scheduled Monument and Outstanding Universal Value of the WHS, Chirk Castle Historic Park & Garden or Chirk Conservation Area.

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- 5.5.3 Cadw have provided consultation responses on the planning applications for both the Orientated Strand Board Production Facility and the Raw Board Store. Cadw have not objected to either of those applications.
- 5.5.4 The Oriented Strand Board Production facility and the Raw Board Store are much larger, more imposing developments than the proposed development. As such, it is considered that the Proposed Development would also have no impact upon the local heritage resource.

6.0 CUMULATIVE EFFECT

6.1.1 The Proposed Development is one of seven principal planning applications submitted to Wrexham County Borough Council since 2016 and is part of the Kronospan Vision 2020 programme. The six other planning applications are as follows:

- Logyard silos and RCF offloading and grading facilities (commissioning)
- Melamine facing press hall / building (complete)
- Wood Chip Preparation Building and WESP Chip Dryer (Submitted May 2017, approved August 2017, Reference: P/2017/0416) (commissioning);
- Log Offloading Facility and Flaker Facility and Refurbishment of the Existing Chipper (Submitted August 2017, approved May 2018, Reference: P/2017/0699) (partially completed);
- Raw Board Storage (Planning permission refused 6th November 2017, granted at Appeal 22nd May 2018 Reference: APP/H6955/A/18/3193142) (not yet constructed); and
- Oriented Strand Board (OSB) Facility (LPA Reference: P/2018/0551, subject to appeal reference APP/H6955/A/19/3227571).

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 It is considered important to take into account the potential cumulative effects of the proposed developments under Kronospan Vision 2020 with regard to noise, air quality, landscape and heritage impacts. Natural Resources Wales have already issued an Environmental Permit which allows the proposed additional CHP gas engines to operate. In issuing an Environmental Permit, Natural Resources Wales deem that the impact is acceptable to the local environment and human health in isolation and together with the other sources of air emissions on the Kronospan site and in the local area. The cumulative effect of the applications also include an overall reduction in the noise resulting from the site operations and less potential for fugitive dust emissions. The Proposed Development will assist Kronospan in becoming more energy efficient and self-sufficient in terms of energy supply.

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- 6.1.4 The potential for cumulative effects in terms of noise, landscape and visual and air quality have been assessed as set out in the preceding section of the report. The assessments have concluded that no significant adverse cumulative effects would arise from the construction and operation of the Proposed Development and that overall improvements in air quality and noise would result from the proposals.
- 6.1.5 From an economic and social perspective, it has been highlighted on a number of occasions within this statement that the implementation of the projects that form the Kronospan Vision 2020, will enable diversification of the business, whilst ensuring no overall job losses. This will allow Kronospan to compete effectively with rival wood-based panel manufacturing companies across Europe, ensuring the long-term sustainability of this important local business.

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 four 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. Finally, Section 7.4 provides a summary of the Planning Policy Appraisal.

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 1.21 of Planning Policy Wales (December 2018) requires 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, landscape and visual impact and air quality. 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
- Policy PS2: Strategic Policy
- Policy PS3: Strategic Policy
- Policy PS4: Strategic Policy
- Policy GDP1: Development Objectives

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- Policy E4: Employment Development (of un-annotated land) within Settlements
 - Policy EC6: Biodiversity Conservation
 - Policy EC7: Conservation Areas

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 (but are not necessarily limited to) 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 (PPW) Edition 10 (December 2018);
- Technical Advice Note (TAN) 12: Design (2016)
- Technical Advice Note (TAN) 23: Economic Development (2014);
- Technical Advice Note (TAN) 24: The Historic Environment (2017)
- People, Places, Futures: The Wales Spatial Plan 2008 Update (July 2008);
- One Wales: One Planet, The Sustainable Development Scheme of the Welsh Assembly Government (May 2009); and
- The following Local Planning Guidance Notes:
 - Local Planning Guidance Note No. 26
 - Local planning Guidance Note No. 33.

7.2.5 A further material planning consideration is the established 'need' for the development which is set out in Section 3.0 of this statement.

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

- 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 Proposed Development is located within a long established employment site which 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 typically result in only a very minor change to the arrangement of elements within the wider site, and would be difficult to discern as a separate or distinct feature. As such, the Proposed Development would have little or no appreciable effect upon the long-established existing influence of the Kronospan site upon views.
- 7.3.5 Noise levels from the Proposed Development have been assessed. When considered in isolation and cumulatively with the noise levels from the existing plant and other proposed development at the Kronospan site, the noise levels resulting from the Proposed Development would be acceptable.

7.3.6 The potential impacts on air quality have been analysed. This analysis concludes there would be no material change in the air quality impact from the current operations on site.

7.3.7 For the aforementioned reasons, the proposal accords with Policies PS1 and PS2.

Policy PS3: Strategic Policy

7.3.8 Policy PS3 aims to ensure that development is directed at brownfield sites rather than greenfield land.

7.3.9 The Proposed Development would be located on previously developed land (as defined on page 38 of the PPW) and therefore the proposal accords with Policy PS3.

Policy PS4: Strategic Policy

7.3.10 Policy PS4 aims to ensure that development should maintain the existing settlement pattern and is integrated in the existing transport network.

7.3.11 The Proposed Development would maintain the existing settlement pattern and character. The staff operating the additional gas engines would rely upon the same transport network as the existing employees. As such the Proposed Development accords with Policy PS4.

Policy GDP1: Development Objectives

7.3.12 Policy GDP1 sets out eleven objectives for all new development. The following four 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.*

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- *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.*
 - *k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.*

7.3.13 As described in Section 5.0, several of the existing structures are appreciably larger than the Proposed Development in terms of height, mass, floorspace, or all three. At the small number of locations where the Proposed Development would be visible, the Proposed Development would always be seen in the context of views where the presence of large-scale structures at the Kronospan site is an established influence, and the Proposed Development would have little or no appreciable effect upon the existing influence of the site. Additionally, a Long Term Landscape Strategy was approved by the Council on 11th October 2018. This strategy will ensure that Kronospan continue to build upon previously implemented mitigation measures which have been highly successful.

7.3.14 As described within Section 2.2 the materials used in the construction of the Proposed Development would reflect the existing built infrastructure at the Site. Accordingly, the Proposed Development would accord with the character of the site.

7.3.15 The Kronospan Vision 2020 projects will provide overall improvements in terms of noise emissions. In terms of the Proposed Development, the mitigation measures set out in the Noise Impact Assessment (Appendix D) would ensure that the operation of additional gas engines would not result in any additional adverse effects in respect of noise.

7.3.16 Kronospan is the 6th largest manufacturer in Wales¹ and provides direct employment for over 620 people, of whom 90% live within 10 miles of the site. The Proposed Development would enable Kronospan to become more self-sufficient in terms of energy supply and to make the manufacturing

¹ Research compiled by Cardiff University and Creditsafe for “Top 300, 2015 Walesonline”

operations more energy efficient. Overall the development would contribute to Kronospan's ability to compete effectively with rival wood-based panel manufacturing companies across Europe and to the economic sustainability of this important local employer.

7.3.17 Accessibility by public transport is not considered to be particularly relevant to the consideration of the Proposed Development as it would not result in any new staff movements. However, the manufacturing site as a whole is well served by existing public transport facilities, with pedestrian and cycle routes leading directly to the staff entrance of the main manufacturing site.

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

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

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

7.3.20 The Kronospan site is not allocated 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 Proposed Development has been found to be in accordance with Policy GDP1 and therefore the proposal fulfils the requirements of Policy E4.

Policy EC6: Biodiversity Conservation

7.3.21 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.

7.3.22 The Chirk Castle and Parkland Site of Special Scientific Interest is located approximately 550 metres west of the Proposed Development site. The

development is proposed within the existing boundary of the Kronospan facility on an area currently occupied by machinery.

7.3.23 The potential air quality impacts on ecology have been analysed. This analysis concluded that the impact on ecological sites would not be significant.

7.3.24 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

7.3.25 This policy seeks to ensure that conservation areas are preserved or enhanced and requires new development *within or in close proximity* to a conservation area to be compatible with the special qualities of the conservation area.

7.3.26 Chirk Conservation Area lies approximately 600 metres to the south of the Proposed Development. No development is proposed within the conservation area and the Proposed Development would be largely screened from view by vegetation and would appear as a very limited addition to existing structures, which would not stand out due to the greater size/scale of existing structures.

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

Material Planning Considerations – The Emerging Development Plan

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

7.3.28 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 and will replace the existing Unitary Development Plan (UDP, 1996-2011) once adopted (currently programmed for late 2019).

7.3.29 The Deposit Plan is the second formal publication of the evolving LDP document. The LDP identifies where and how much new development will take place in the County Borough, as well as which areas need to be protected for their environmental qualities. Once adopted, the LDP will replace the UDP and will be used to make decisions on all planning applications.

7.3.30 The Deposit Plan contains site specific land allocations and detailed planning policies. A six week period of consultation on the Deposit Plan took place in May 2018 and all representations and WCBC's response were reported to the Council in November 2018. The emerging Development Plan is anticipated to be adopted in late 2019. As such, the emerging Development Plan is at an advanced stage of its preparation and due weight should be attributed in the determination of this planning application to the policies contained within the emerging plan. The relevant policies and objectives of the Deposit Plan are considered under the headings below.

Economy and Employment

7.3.31 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".

7.3.32 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*.

7.3.33 The Kronospan site is allocated as an employment area on the Proposals Map. 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 and seeks to

facilitate a level of growth which allows opportunities to deliver approximately 4200 jobs in the County Borough over the Plan period.

- 7.3.34 The Proposed Development is part of a programme of improvement of the operational efficiency of the site which will allow Kronospan to increase their self-sufficiency in terms of energy supply. This would help prevent interruptions to the manufacturing processes and increase the efficiency of these processes.
- 7.3.35 The development would contribute to Kronospan's ability to compete effectively with rival wood-based panel manufacturing companies across Europe and to the economic sustainability of this important local employer.
- 7.3.36 The policy and objectives centred on Economy and Employment therefore add weight to the policy support for the Proposed Development.

Natural Environment

- 7.3.37 Strategic Objective SO9 seeks to: "*Protect, manage and enhance the natural and historic environment and landscapes*".
- 7.3.38 Strategic Policy *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.
- 7.3.39 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.
- 7.3.40 A Landscape and Visual Impact Assessment has been completed to support this application. The LVIA concluded 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.

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- 7.3.41 For the aforementioned reasons the Proposed Development is in accordance with the main relevant policies and objectives relating to the natural environment.

Development Management

- 7.3.42 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.

Material Planning Considerations – Other National, Regional and Local Planning Considerations

Planning Policy Wales (Edition 10, December 2018)

- 7.3.43 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.

- 7.3.44 The following chapters of PPW are considered relevant to the Proposed Development:

- Sustainable Development (Introduction);
- Productive and Enterprising Places (Chapter 5); and
- Distinctive and Natural Places (Chapter 6).

- 7.3.45 The relevant advice within these chapters of PPW is outlined below and considered in the context of the Proposed Development.

- 7.3.46 The introductory chapter to PPW confirms that ‘sustainable development’ is:

“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.”

7.3.47 The well-being goals are shown on PPW Figure 2. PPW Page 9 echoes the sustainable development principle defined in the Well-being of Future Generations (Wales) Act 2015 and states the following:

“Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.”

7.3.48 Paragraph 1.17 states that *“legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.”*

7.3.49 The environmental impacts of the Proposed Development have been assessed, as reported in Section 5.0 of this Planning Statement. The assessments conclude that the development would not give rise to any unacceptable effects.

7.3.50 The need and benefits of the Proposed Development are set out in Section 3.0 and the economic benefits are explored further below in context of Technical Advice Note 23: Economic Development. 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.

7.3.51 Based on the foregoing 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.

7.3.52 Chapter 5 of PPW, ‘Productive and Enterprising Places’, covers the economic components of placemaking. Section 5.4 explains that the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long term prosperity, jobs and incomes.

7.3.53 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. The Proposed Development would assist the long term sustainability of the business in Chirk by reducing the vulnerability of the manufacturing processes to power shortages and improving the efficiency of the Kronospan site operations. In turn this will contribute to the overall competitiveness of the business with other wood-based panel manufacturing companies across Europe and to the economic sustainability of this important local employer.

7.3.54 Chapter 5 also acknowledges that the planning system has an active role to play to help ensure the delivery of renewable energy targets and the promotion of energy efficiency measures. The proposed CHP gas engines are a form of low carbon energy technology². Paragraph 5.0.2 recognises that our homes and businesses need to be powered and heated by low carbon energy sources and that we need to optimise our use of energy with them. Paragraph 5.7.4 reiterates the Welsh Government's priorities to:

- Reduce the amount of energy used in Wales;
- Become less reliant on energy generated from fossil fuels; and
- Actively manage the transition to a low carbon economy.

7.3.55 Paragraph 5.7.8 sets out the requirements of the planning system to tackle climate change and increase energy security, these requirements include maximising renewables and low carbon energy generation.

7.3.56 The Proposed Development comprises a low carbon form of energy generation. The Proposed Development would reduce demand on the local grid for electricity to facilitate operations at the Kronospan site, and reduce the likelihood of manufacturing processes being interrupted through power shortages. The energy efficiency of the operations would be increased by virtue of the heat derived from the combusted gas being used within the on-site manufacturing operations.

7.3.57 Chapter 6 of PPW cover the environmental and cultural components of placemaking. The special and unique characteristics and intrinsic qualities of the natural and built environment are recognised and the need to protect these features to give places their unique identity and distinctiveness is

² Planning for Renewable and Low Carbon Energy - A Toolkit for Planners (September 2015) Available at: <https://beta.gov.wales/sites/default/files/publications/2018-09/renewable-energy-toolkit.pdf>

acknowledged. The factors that PPW covers includes the historic environment, landscape, biodiversity, water and flood risk, air quality and soundscape. All these factors have been considered and where appropriate assessments have been presented in this application. In this regard the Proposed Development accords with the policies set out in Chapter 6 of PPW.

Conclusions

- 7.3.58 The Proposed Development would contribute to each of the national policies outlined above and it has been established that the proposals represent Sustainable Development.
- 7.3.59 The Proposed Development would result in a number of benefits to the Kronospan site, enabling Kronospan to increase their self-sufficiency in terms of electricity supply. By becoming more self-sufficient, Kronospan can reduce the risk of interruptions to the manufacturing processes and maintain the competitiveness of the business with other wood-based panel manufacturing companies. The Proposed Development would contribute to the environmental efficiency of operations at the manufacturing site by using the heat from the gas engines in the manufacturing process.
- 7.3.60 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) 12: Design (2016)

- 7.3.61 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 Access and Movement, Character, Community Safety and Environmental Sustainability.
- 7.3.62 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.”.

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- 7.3.63 The Proposed Development is a functional development that will enable Kronospan to generate electricity and heat to power their manufacturing processes. Other than ensuring that the building meets its functional requirements, the principle design driver is for the building to fit into its local context i.e. an industrial site, and so far as is possible to reduce the prominence of building from any locations outside the site from where it can be seen.
- 7.3.64 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
- 7.3.65 The development would be located in the southwestern corner of the Kronospan site adjacent to other long established, large buildings, tall and prominent industrial process equipment and other industrial infrastructure. The Kronospan site forms a long established landmark locally and whilst undoubtedly a visual detractor, is 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).
- 7.3.66 The Proposed Development would be consistent in height with the surrounding structures, including the adjacent gas engines building. As set out in Section 2.2, the Proposed Development and would be clad in Agate Grey cladding (subject to the agreement of WCBC) which has been selected to reduce the visual impact of the facility. Furthermore, the existing influence of the industrial site would not be altered or extended.
- 7.3.67 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.

- 7.3.68 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. A Landscape and Visual Impact Assessment is contained in Appendix C. This assessment concluded 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) 23: Economic Development (2014)

- 7.3.69 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.
- 7.3.70 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”*.
- 7.3.71 Kronospan Vision 2020 sets out the company’s aim to make Kronospan a world leading wood-based panel production site. Kronospan envisage achieving this through the following measures:
- investing in the business in order to reduce the environmental impact of the operations at the site;
 - improving operational efficiency through much needed equipment upgrades; and
 - offering new business and revenue streams.

7.3.72 The above measures will be achieved through the investment of £200 million. As set out previously, Kronospan are an important local employer providing direct employment for over 620 people, the majority of whom live locally, and paying over £1.3 million in net wages every month. The business also makes a significant contribution to the local and national economy via business rates and corporation tax. Annually the business contributes over £1 million through business rates and since 1970 the business has paid £57 million in corporation tax.

7.3.73 The Proposed Development would enable Kronospan to become more self-sufficient, to make their operational processes more efficient, and to safeguard the operational processes from interruptions due to power shortages. Overall, this will benefit the competitiveness of the business and the economic sustainability of this local employer.

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

7.3.74 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.

7.3.75 A Landscape and Visual Impact Assessment has been completed and has confirmed that the additional presence of the Proposed Development would be unremarkable. Visibility from the World Heritage Site and from the Chirk Castle estate would be very limited (refer to Viewpoints I, L, M & N) and would not affect the experience of visitors to these features.

7.3.76 As such, the Proposed Development would not result in any impact upon the heritage significance of the local cultural heritage resource.

‘People, Places, Futures’: The Wales Spatial Plan 2008 Update (July 2008)

7.3.77 The Spatial Plan is a twenty year plan for the sustainable development of Wales. It comprises the overarching framework and integration tool and provides important underpinning in a whole range of matters, such as:

- *“Economic development and the long term goal of full employment at a rate of 80%; and*
- *Making the right decisions, and getting the most benefit from specific; and major investment decisions, affecting public services;”*

7.3.78 The final section of the Spatial Plan presents the Area Strategies for the six identified Plan Areas. The Kronospan site is located within the North East Wales Border and Coast Region. The overall vision for this region is: *“an area harnessing the economic drivers on both sides of the border, reducing inequalities and improving the quality of its natural and physical assets”*. The Spatial Plan recognises that this region is highly dependent on the manufacturing sector both in terms of jobs provided and the gross value added to the local and national economy. The Proposed Development would contribute to the economic sustainability of the Kronospan site in Chirk. Clearly the Kronospan facility, and therefore the contribution that the Proposed Development makes to the ongoing success of this business, makes an important contribution to meeting the aims of the Spatial Plan.

One Wales: One Planet, the Sustainable Development Scheme of the Welsh Assembly Government (May 2009)

7.3.79 The document indicates that sustainable development is the overarching strategic aim of all the Welsh Government’s policies and programmes. The Sustainable Development Scheme includes strategies for sustainable resource use, sustaining the environment, a sustainable economy, a sustainable society and the wellbeing of Wales. Where the economy is concerned the vision is for a: *“resilient and sustainable economy for Wales that is able to develop whilst stabilising, then reducing its use of natural resources and reducing its contribution to climate change”*.

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- 7.3.80 As identified previously, Kronospan is continually seeking to improve efficiency and reduce waste in order to improve the sustainability of the products it manufactures. The Kronospan site makes a contribution to the development and growth of sustainable businesses in Wales, in line with the vision set out by the Welsh Government within *One Wales: One Planet, the Sustainable Development Scheme of the Welsh Assembly Government*.

Local Planning Guidance Notes

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 Council's approach to planning issues. The Local Planning Guidance Notes have been reviewed and one of these notes has been identified to be of relevance to the proposal. This document has been considered with regard to the Proposed Development below.

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

- 7.3.81 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.
- 7.3.82 As described in Section 5, the Proposed Development would typically result in only a minor change to the arrangement of elements within the wider site. The additional presence of the Proposed Development would be unremarkable and would result in 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.
- 7.3.83 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. Furthermore, a Long Term Landscape Strategy for the Kronospan site has been approved by the Council and is in the process of being implemented. This document

provides a comprehensive analysis of the opportunities for landscape mitigation within the surrounding area and sets out a programme of landscaping management and planting that would help mitigate views of the wider facility, including views of the Proposed Development.

7.3.84 As described in Section 2.2 above the Proposed Development would be located adjacent to other long established buildings in the south western corner of the Kronospan site. The Proposed Development would be clad in a similar light grey colour to the surrounding structures in order to minimise it's visual impact.

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

7.4 Planning Policy Appraisal - Summary

7.4.1 Table 7.1 gives a detailed breakdown of all national, regional and local policies against which the proposal is assessed and provides a conclusion of whether the proposed development accords with the relevant policies.

Table 7.1: Assessment of the Proposal against Planning Policy and Guidance

Policy No	Policy Thrust	Development aids policy	Development is neutral to policy	Development does not accord with policy
<i>Wrexham Unitary Development Plan 1996 – 2011 (UDP)</i>				
Policy PS1	Directs new development for housing, employment, and community services to within defined settlement limits/employment areas.	✓		
Policy PS2	Seeks to prevent development that would materially detrimentally affect the countryside landscape/townscape character, open space, or the quality of the natural environment.	✓		
Policy PS3	Directs development to previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land.	✓		

Policy No	Policy Thrust	Development aids policy	Development is neutral to policy	Development does not accord with policy
Policy PS4	Development should be integrated with the existing transport network	✓		
Policy GDP1	Sets a series of general requirements/criteria all new development should comply with.	✓		
Policy E4	Employment development on un-annotated land within settlement limits will be permitted subject to compliance with Policy GDP1.	✓		
Policy EC6	Development either within or close to sites of biodiversity interest will only be permitted where it can be clearly demonstrated that the need for the development outweighs the need to safeguard the intrinsic nature conservation value of the site.		✓	
Policy EC7	Within, and in close proximity to, conservation areas, the priority will be to preserve and/ or enhance those buildings, structures, streets, trees, open spaces, archaeological remains, views, and other elements which contribute to the unique character of the area.		✓	
<i>Material Planning Considerations</i>				
<i>Wrexham Local Development Plan 2013 – 2028 Deposit Plan</i>				
Objective SO2	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.	✓		
Policy SP2	Direct new development to the defined settlement limits and employment areas as identified on the Proposals Map.	✓		
Policy SP9	Sets out measures to diversify the local economy and widen the economic base to ensure the continued role of the County Borough as a key economic driver.	✓		
Policy EM1	Sets out the protected employment areas, including Chirk Industrial Estate, to be protected for B Use Class.	✓		
Objective SO9	Protect, manage and enhance the natural and historic environment and landscapes.		✓	

Policy No	Policy Thrust	Development aids policy	Development is neutral to policy	Development does not accord with policy
Policy SP16	Confirms that development will only be supported where it conserves, protects and enhances the cultural and heritage assets of the County Borough and, where appropriate, their settings.		✓	
Policy NE4	Sets out the requirements for development in respect of effects on the AONB.		✓	
Policy DM1	Sets out the requirements that all development proposals must fulfil.	✓		
<i>Planning Policy Wales (Edition 9, November 2016)</i>				
Sustainable Development (Introduction)	Defines sustainable development and states the presumption in favour of sustainable development.	✓		
Productive and Enterprising Places (Chapter 5)	Covers the economic components of place making.	✓		
Distinctive and Natural Places (Chapter 6).	Covers the environmental and cultural components of placemaking	✓		
<i>Other Relevant Government Policy / Strategy Documents</i>				
People, Places, Futures. The Wales Spatial Plan (2008 Update)	Provides a 20-year plan for sustainable development in Wales including a vision for the North East Wales region.	✓		
One Wales: One Planet, the Sustainable Development Scheme of the Welsh Assembly Government (May 2009)	Sets out the Welsh Government's vision of a sustainable Wales.	✓		
<i>Local Planning Guidance Notes</i>				
Local Planning Guidance Note No. 26 – Landscape and Industrial Development	Aims to improve understanding of the landscape and environmental issues which the Council will take account of when determining applications for industrial development.		✓	

7.4.2 It can be seen from the assessment of the statutory Development Plan and other material planning considerations in Table 7.1 above, that the

Proposed Development is either in conformity with, or supported by, all facets of the identified, relevant planning context.

8.0 CONCLUSION

- 8.1.1 Kronospan are aiming to deliver two additional gas engines adjacent to the existing three gas engines at the site. An Environmental Permit (Reference EPR/BW9999IG/V007) for the operation of all five gas engines was granted by NRW in 2015.
- 8.1.2 The Proposed Development would enable Kronospan to increase their self-sufficiency in terms of energy supply through the creation of their own low carbon energy at the Chirk manufacturing site. This would help prevent interruptions to the manufacturing processes and increase the efficiency of the manufacturing operations. By virtue of the above, the Proposed Development would contribute to the economic sustainability of the Kronospan site, which is an important local employer.
- 8.1.3 An assessment of the proposals against the relevant planning policy and guidance has demonstrated that the scheme meets the test of Section 38(6) of the Planning and Compulsory Purchase Act and paragraph 1.21 of Planning Policy Wales 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.
- 8.1.4 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.