



KRONOSPAN ORIENTED STRAND BOARD PRODUCTION FACILITY

**PLANNING APPEAL BY KRONOSPAN UNDER SECTION 78 OF THE
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
AGAINST THE FAILURE BY WREXHAM COUNTY BOROUGH
COUNCIL TO DETERMINE AN APPLICATION FOR PLANNING
PERMISSION FOR THE PROPOSED DEVELOPMENT OF AN
ORIENTED STRAND BOARD FACILITY**

LPA REFERENCE: P/2018/0551

STATEMENT OF CASE ON BEHALF OF THE APPELLANT

APRIL 2019



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CONTENTS

1.0	INTRODUCTION AND BACKGROUND TO THE PROPOSAL	1
1.1	This Document	1
1.2	The Appellant	1
1.3	Background to the Development.....	1
2.0	DESCRIPTION OF THE APPEAL SITE AND SITE CONTEXT	3
2.2	Planning History	6
3.0	THE APPEAL PROPOSAL	9
3.1	Introduction.....	9
3.2	Layout and Design of the Appeal Proposal	9
3.3	Proposed Site Operations.....	10
3.4	Employment Opportunities.....	11
4.0	PROCEDURAL BACKGROUND	13
4.1	Introduction.....	13
4.2	Pre-application Consultation with WCBC	13
4.3	Environmental Impact Assessment Screening	13
4.4	Pre-application Consultation	13
4.5	Application Submission.....	14
4.6	Presentation to Landscape and Heritage Consultees	14
4.7	Consultation Responses.....	15
4.8	Committee	16
4.9	Post-Committee.....	16
5.0	THE DEVELOPMENT PLAN.....	18
5.2	Emerging Development Plan	7
5.3	Development Plan Conclusions	11
6.0	MATERIAL CONSIDERATIONS	12
6.1	Introduction.....	12
6.2	Benefits of the Appeal Proposal.....	12
6.3	Planning Policy Material Considerations	16
7.0	MATTERS RAISED DURING DETERMINATION PERIOD	31
8.0	CONCLUSIONS AND SUMMARY	38

FIGURES

Figure 1 Annotated Aerial Photograph

CORE DOCUMENTS

CD 1 Kronospan OSB Facility Planning Application and Decision Documents	
CD 1.1	The Planning Application Document (Axis, 2018) comprising:
	i) Planning Application Form and Certificates
	ii) Planning Statement
	- Appendix A – Landscape and Visual Impact Assessment
	- Appendix B – Transport Assessment
	- Appendix C – Noise Impact Assessment
	- Appendix D – Heritage Assessment
	- Appendix E - Air Quality Assessment
	iii) Design and Access Statement
	iv) Planning Application Drawings
	v) Pre-Application Consultation Report
	vi) Validation Checklist
CD 1.2	Long Term Landscape Strategy
CD 1.3	Committee Report and Committee Minutes
	i) Committee Report 4 th March 2019
	ii) Addendum Committee Report 4 th March 2019
	iii) Minutes of planning Committee
CD 1.4	Application Acknowledgment Letter
CD 1.5	Traffic Management Plan
CD 1.6	Highways Technical Note
CD 2 Consultee Responses and Communication During Determination	
CD 2.1	AONB Group
CD 2.2	Cadw
CD 2.3	Canal and River Trust
CD 2.4	Clwyd-Powys Archaeological Trust
CD 2.5	WCBC Environmental Protection
CD 2.6	WCBC Highways 12 th November 2018
CD 2.7	WCBC Highways 22 nd February 2019
CD 2.8	Health and Safety Executive
CD 2.9	National Trust
CD 2.10	Natural Resources Wales
CD 2.11	Wales and West Utilities
CD 2.12	Welsh Government
CD 2.13	Welsh Water
	Highways Correspondence
CD 2.14	- Submission of TMP 30 th November 2018
CD 2.15	- Highways Email to Officer 10 th Dec 2018
CD 2.16	- Axis Email to Officer 17 th Dec 2018
CD 2.17	- Highways Email to Officer 17 th Jan 2019
CD 2.18	- Axis Response to Highways Queries 21 st Jan 2019
CD 2.19	- Submission of Tech Note 22 nd Jan 2019
CD 2.20	- Highways Response 14 th Feb 2019
CD 2.21	- Axis Response to Highways Queries 15 th Feb 2019
CD 2.22	- Highways Response 19 th Feb 2019
CD 2.23	- Axis Response to Highways Queries 21 st Feb 2019
CD 2.24	- Development Management 21 st Feb 2019
CD 2.25	- Axis Response to Development Management 21 st Feb 2019
CD 3 Development Plan	
CD 3.1	Wrexham Unitary Development Plan 1996 - 2011
CD 3.2	Chirk Conservation Area Character Assessment & Management Plan

CD 3.3	Wrexham Local Development Plan 2013 – 2028 Deposit Plan (March 2018)
CD 3.4	Wrexham Local Development Plan 2013 – 2028 Schedule of Proposed Focussed Changes (FC's) and Minor Editing Changes (MEC's) to the Wrexham Deposit LDP 2013 – 2028 (November 2018)
CD 4 Other Documents	
CD 4.1	Subjective Wellbeing and Employment
CD 4.2	Well-being of Future Generations (Wales) Act 2015
CD 4.3	Planning Policy Wales; Edition 10. December 2018
CD 4.4	One Wales: One Planet. The Sustainable Development Scheme of the Welsh Assembly Government (May 2009)
CD 4.5	People, Places, Futures. The Wales Spatial Plan 2008 Update (July 2008)
CD 4.6	Technical Advice Note (TAN) 12: Design (2016)
CD 4.7	Technical Advice Note (TAN) 23: Economic Development (2014)
CD 4.8	Technical Advice Note (TAN) 24: The Historic Environment (2017)
CD 4.9	Wrexham County Borough Council - Council Plan 2017-22 (2017) & Economic Prosperity Strategy 2012-2016
CD 4.10	Local Planning Guidance Note No. 26
CD 4.11	Local Planning Guidance Note No. 33
CD 4.12	House of Commons Briefing Paper Number 06492, 20 September 2017, Productivity in the UK, By Daniel Harari
CD 4.13	Regional and sub-regional productivity in the UK: February 2019

1.0 INTRODUCTION AND BACKGROUND TO THE PROPOSAL

1.1 This Document

1.1.1 This Statement of Case has been prepared by AXIS, on behalf of Kronospan (the Appellant) who is the planning applicant and the developer. It relates to, and is submitted in support of, a planning appeal against Wrexham County Borough Council's (WCBC) non-determination of an application for the development of an oriented strand board production facility (the Appeal Proposal).

1.1.2 The site of the Appeal Proposal is land at the existing Kronospan manufacturing facility on Holyhead Road (the B5070), Chirk (the appeal site).

1.2 The Appellant

1.2.1 Kronospan Limited 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. The Appeal Proposal would introduce a third raw board process for the production of Oriented Strand Board (OSB).

1.2.2 The Kronospan manufacturing facility is a major local employer within Wrexham County Borough with the site at Chirk employing over 650 staff, 90% of which live within 10 miles of the appeal site. 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.

1.3 Background to the Development

1.3.1 The Appeal Proposal forms part of Kronospan Vision 2020, a capital investment programme with a total cost of £200 million. Kronospan Vision 2020 involves delivery of new buildings and improved raw material handling facilities. It will also provide significant investment in new manufacturing equipment and the reorganisation of product flow within the existing buildings to improve the efficiency of the manufacturing process.

1.3.2 Kronospan Vision 2020 will deliver environmental improvements at the site and ensure the long-term viability of the business by improving the manufacturing

efficiency and productivity. As described later in the document, investment programmes such as this are critical to enable manufacturing businesses to succeed in the UK. The improvements proposed will help maintain Kronospan's status as UK's leading manufacturer of high quality wood-based panels and thereby help secure the manufacturing plant in Chirk, an important local and regional employment generator.

1.3.3 The Appeal Proposal is one of six major projects proposed under the Kronospan Vision 2020 programme:

- Logyard silos and RCF offloading and grading facilities (in the commissioning phase)
- Melamine facing press hall / building (complete)
- Wood Chip Preparation Building and WESP Chip Dryer (in the commissioning phase)
- Log Delivery and Transfer System and Building to House a Wood Chipping and Flaking System (planning permission granted, development not yet commenced);
- Raw Board Storage (planning permission granted, development not yet commenced); and
- Oriented Strand Board (OSB) Facility (the Appeal Proposal).

1.3.4 Although all six proposals perform separate operational roles, together they deliver the improvements necessary to secure the ongoing success of the manufacturing site in Chirk.

1.3.5 In recognition that all six proposals were being proposed in a similar timeframe each planning application included an assessment of cumulative effects so that the environmental effects of the schemes could be considered in isolation and in combination with one another.

2.0 DESCRIPTION OF THE APPEAL SITE AND SITE CONTEXT

- 2.1.1 The location of the Appeal Proposal 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.
- 2.1.2 The Kronospan site comprises a number of large industrial process buildings, storage areas for raw materials, warehouse buildings for manufactured products, offices and car parking. The appeal site provides direct employment to over 650 staff and in turn the circa 6,000 plus people in the UK indirectly supported by its operations.
- 2.1.3 The Kronospan manufacturing facility covers an area of circa 40ha, with circa 14ha of this developed with industrial buildings and plant. Figure 1 (CD 1.1ii) shows the layout of the site. Figure 1 to this Statement of Case provides an illustration of the layout of the overall Kronospan manufacturing site and also identifies the location of the Appeal Proposal and other recently constructed/approved developments which form part of the Kronospan 2020 Vision described above.
- 2.1.4 The appeal site covers an area of 2,480m² and is formed partially by an existing warehouse building which would be modified as part of the development and an area of hardstanding on which processing facilities used to process, sort and dry the raw wood materials used in the manufacture of MDF/particle board are currently located. These processing facilities are being removed/relocated as part of the Wood Chip Preparation Building and WESP Chip Dryer development listed in paragraph 1.3.3 (planning permission ref. P/2017/0416).
- 2.1.5 The tallest structures on Kronospan manufacturing site are the CHP emissions stack (70m), the existing WESP stack (65.5m) and the MDF cyclones (57m).
- 2.1.6 A number of other process buildings are located in the northern half of the Kronospan manufacturing site including: a saw mill; formalin plant and the secondary product manufacturing facility (Kronoplus) which produces laminate flooring and worktops.
- 2.1.7 A car park, reception building, weighbridge and main site offices are located to the east of the appeal site.
- 2.1.8 The western perimeter of the Kronospan manufacturing 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 Kronospan manufacturing 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 Kronospan manufacturing site is formed by Holyhead Road (B5070). An earth bund, planted with trees, has been developed along the eastern perimeter to reduce the visibility of operations from neighbouring properties on Holyhead Road and the housing estate to the east.

- 2.1.9 A sewerage pumping station and one property owned by Kronospan, are located to the immediate north of the Kronospan manufacturing site. To the immediate south of the Kronospan manufacturing site is the Mondelez factory, the Chirk AAA sports ground and the Chirk recreational ground.
- 2.1.10 The main residential area of Chirk is located to the east of the Kronospan manufacturing 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. Parts of the town centre are designated as Chirk Conservation Area.
- 2.1.11 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 Kronospan manufacturing site, beyond the canal. The Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) also lie to the west, the closest boundary of the AONB runs concurrent with the grounds of Chirk Castle.

Access

- 2.1.12 The Appeal Proposal would not result in any change to the existing access arrangements. The Kronospan manufacturing site is accessed via a T-junction with Holyhead Road (B5070) which runs in a north south direction to the east. The B5070 meets the A5 approximately 1.5km to the north of the site access 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.

2.1.13 As described above the Kronospan manufacturing site includes a railhead and sidings which are used to import timber for the manufacturing process.

2.2 Planning History

- 2.2.1 The appeal site and the wider Kronospan manufacturing site has a long and complex planning history. A detailed planning history is provided in Table 4.1 of the Planning Statement (CD 1.1ii).
- 2.2.2 Prior to the 1970s, the Kronospan manufacturing site was greenfield agricultural land and included a farm house. The original 17th Century farmhouse still forms part of the offices of Kronospan.
- 2.2.3 The construction of the first factory building commenced in 1971 and the company began operating in 1973. In the late 1980s, the company bought a factory adjacent to the original factory building. This has since been extended to provide the base for the company's 'Kronoplus' operation.
- 2.2.4 Over the past 5 years Kronospan has started a modernisation and improvement programme, Kronospan 2020 described in Section 1.0, 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 2.1 – Key developments approved since 2012

Application Ref. No.	Proposal	Decision
P/2012/0165	Development of biomass plant, recycled wood fibre (RCF) offloading & screening facility & associated infrastructure to support existing production operations	Approved - 14 September 2012
P/2013/0824	Development of biomass plant comprising biomass boiler & furnace ash, handling facility & flue, gas treatment facility including stack & air pollution control, reagent storage silos, recycled wood fibre offloading & screening facility, biomass storage area & associated infrastructure (substitution of planning permission code P/2012/0165)	Approved - 07 May 2014
P/2014/0215	2.5m diameter by 7m high extension to existing 15m high abatement stack.	Approved 02 June 2014

Application Ref. No.	Proposal	Decision
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 oil and diesel storage tanks, a vehicle filling station, garage service building and other associated infrastructure.	Refused – 05 September 2016 Granted at Appeal – 04 May 2017 (Reference APP/H6955/A/16/3165368)
P/2016/0534	Proposed building extension to store medium density fibreboard (MDF) and chipboard.	Refused – 05 September 2016
P/2017/0416	Replacement of existing wood chip preparation facility and development of a new wood chip dryer and associated equipment.	Approved – 31 July 2017
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.	Approved – 10 May 2018
P/2017/0700	Development of a raw board store	Refused – 6 th November 2017 Granted at Appeal – 22 May 2018 (Reference: APP/H6955/A/18/3193142)

2.2.5 Of relevance to this appeal is also the submission in May 2017 of a Long Term Landscape Strategy pursuant to Condition 5 of application reference P/2016/0219

(CD1.2). The landscape strategy has been designed to reduce the visibility of the wider Kronospan facility from nearby receptors and was developed in consultation with the Council; the local community (via the Chirk Environmental Liaison Group); the multi-agency bodies that protect the interests of the WHS and AONB; the National Trust and other relevant 3rd parties including landowners during January and February 2017. The Long Term Landscape Strategy was approved in October 2018 (application reference P/2017/0421). Preparatory work on protective barrier fencing has started and most planting is scheduled to take place Autumn 2019.

2.2.6 In conclusion, the planning history identifies that:

- The Kronospan site has been developed since the 1970s;
- 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 developments 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;
- Kronospan are seeking to implement schemes to reduce the visual impact of the wider facility; and
- WCBC recognise that the site is continuously evolving in order to remain efficient and competitive.

3.0 THE APPEAL PROPOSAL

3.1 Introduction

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

3.2 Layout and Design of the Appeal Proposal

3.2.1 The Appeal Proposal comprises the development of an OSB production facility and is formed of two main components:

- a new OSB blending building and material screener and sifter, where the material would be screened, sifted and mixed with resin and wax; and
- the vertical extension of the existing press hall to accommodate a new OSB press and OSB forming line.

3.2.2 The proposed OSB blending building would be located to the west of the existing press hall building and would be 34.6m in length, 23m wide and 33.2m in height.

3.2.3 A new quadradyn material screener and new sifters, located to the west of the OSB blending building, would be used to screen the flaked chip for fines and to group the chip by size so that the correct sized chip would be used for each layer of board; either surface layer or core layer. The quadradyn material screener would have a maximum height of circa 22m. The sifters would be circa 6.5m in height.

3.2.4 The proposed vertical extension of the existing warehouse is 54m in length, 30.6m wide and would provide an additional circa 27,264.6m³ volume to the existing press hall. The existing building has a maximum height of 11.5m and would be raised to 28m.

3.2.5 Chain conveyors would be provided to transfer material from the chip screening equipment to the blending station and from the blending station into the forming station. Three storage silos for the storage of wood chip would be located to the south of the quadradyn material screener.

3.2.6 The press hall extension and the proposed OSB blending building would be located adjacent to other long established buildings in the south western corner of the Kronospan site.

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- 3.2.7 The elevations of the Appeal Proposal are shown on drawing no. 2197-01-02 (CD 1.1iv). A series of photomontages are contained in Appendix A to the Planning Statement (CD 1.1ii) that illustrate the Appeal Proposal from a number of key locations in the vicinity of the appeal site.
- 3.2.8 The proposed colour for the Appeal Proposal is Olive Green. The colour of the cladding has been chosen in order to reduce the visual impact of the facility, and this decision has been informed by a colour study undertaken for the development of a log offloading facility and flaker facility and refurbishment of the existing chipper (planning permission P/2017/0699). Nonetheless, it is proposed that the final colour of the Appeal Proposal could be agreed through condition to enable WCBC to determine the most suitable colour for the development.

3.3 Proposed Site Operations

- 3.3.1 The OSB production facility would be used to accommodate an OSB blending station, forming line and board press which would enable Kronospan to produce OSB at the manufacturing facility in Chirk.
- 3.3.2 Round wood is used for the production of OSB. This would be delivered to the site via rail and HGV deliveries. The transport effects of the Appeal Proposal are assessed in the Transport Assessment which is contained in Appendix B of the Planning Statement (CD 1.1ii). In summary, the OSB production facility would result in a net increase in daily HGV loads of 91 vehicles (one way). Based on current delivery profiles this would equate to just 11 additional two-way HGV movements during the AM network peak hour (5 in / 6 out), falling to 8 movements during the PM peak period. This represents a maximum of 1 additional HGV movement every 6 minutes. Kronospan would utilise the existing rail head to deliver a significant proportion of the round wood used in the manufacture of the OSB, with the equivalent of circa 10,000 HGV loads being delivered per year by rail.
- 3.3.3 The round wood would be flaked in the new flaking facility (approved under permission reference: P/2017/0699) located within the log yard area. The flaked wood will be conveyed to and stored in wet chip bunkers (approved under permission reference: P/2017/0416) located to the south of the flaking facility.
- 3.3.4 The wet flakes would then be conveyed to two existing direct heating driers with an associated WESP (wet electrostatic precipitator) air pollution abatement system, where they would be dried prior to being processed into OSB.

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- 3.3.5 The dried flakes would then be transferred to the quadradyn material screener and oscillating screens where the wood flakes would be graded into different sizes and fines would be removed. At this stage the larger flakes would be directed to form the surface layer of the board and the smaller flakes would be directed to form the core layer.
- 3.3.6 The graded flakes to be used in the core and surface layers would then pass to the OSB building by chain conveyors. The processes which would take place in the OSB building would be fed by gravity, thereby dictating the height of the OSB building. The first process in the OSB building involves the weighing of the flakes to ensure that the right amount of flakes pass into the glue drum. From the scales the flakes would drop into the glue drum where they would be mixed with resin and wax to bind the flakes. The material would then be transferred by conveyor to the OSB press and forming line.
- 3.3.7 The press and forming line would be located within the extended area of the existing press hall building. Flakes would be dropped from height to form the core and surface layers of the board. The height of the building is dictated by the requirement for the wood flakes to be deposited onto the forming line.
- 3.3.8 The core and surface layers would be formed along separate press and forming line within the press hall. Layers of bound flakes would be built up on the forming line so that several layers of chip are produced, with each layer of chip oriented perpendicular to the previous layer. A combination of heat and pressure is then used to press the layers of coated flakes to form the material into OSB.
- 3.3.9 Once formed, the OSB is cooled to form the finished OSB product which is then stacked, ready for distribution or further processing.
- 3.3.10 As described above the proposed press and forming line would be located within an existing manufacturing building. The increased height of the building is required to accommodate the forming station and other plant associated with the OSB production process. The OSB blending building is required to be 33.2m high in order to facilitate the feeding of material by gravity into the blending station. The underpass beneath the blending building is required to provide access to existing operational areas of the site, including emergency access to these areas.

3.4 Employment Opportunities

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- 3.4.1 The Appeal Proposal would enable Kronospan to produce a new product. The new production line would require 100 people to be employed and trained to operate the machinery and produce the OSB.

4.0 PROCEDURAL BACKGROUND

4.1 Introduction

- 4.1.1 This section provides a factual description of the process leading up to the submission of the application and events during the determination process, up to the submission of this appeal against non-determination.

4.2 Pre-application Consultation with WCBC

- 4.2.1 A meeting was held with WCBC on 26th May 2017 to discuss the projects proposed under the Kronospan Vision 2020 programme, including the Appeal Proposal. At this meeting it was agreed that the planning application should be accompanied by detailed assessments on the potential noise, landscape, heritage, transport and air quality effects of the Appeal Proposal.

4.3 Environmental Impact Assessment Screening

- 4.3.1 The Appeal Proposal falls within the description at paragraph 8(a) in column 1 of the table in Schedule 2 to The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (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.
- 4.3.2 A number of environmental assessments were conducted in support of the planning application, focusing on the elements of the development considered most likely to result in adverse environmental effects i.e. landscape, transport, visual, heritage, air quality and noise. The assessments demonstrate that there would be no significant environmental effects from the Appeal Proposal, 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. WCBC did not screen the development as EIA when the application was received.

4.4 Pre-application Consultation

- 4.4.1 Pre-application consultation was undertaken in accordance with The Town and Country Planning (Development Management Procedure) (Wales) Amendment Order 2016. Details of the consultation process, the responses provided and how

the responses have been addressed in the application is set out in the Pre-application Consultation Report (CD 1.1v). This report was submitted with the planning application.

4.5 Application Submission

4.5.1 The planning application (CD 1.1) was submitted to Wrexham County Borough Council on 3rd July 2018. The planning application is formed of the following documents:

- Planning Application Forms and Certificates
- Validation Statement
- Planning Drawings and Figures
 - 2197-01-01 Rev C - Statutory Plan (Planning Application Boundary)
 - 2197-01-02 Rev B – Site plan and Elevation
 - Figure 1 – Site Location
 - Figure 2 - Cumulative Developments
- Design and Access Statement
- Pre-Application Consultation Report
- Planning Statement which includes:
 - Appendix A – Landscape and Visual Impact Assessment
 - Appendix B – Transport Assessment
 - Appendix C – Noise Impact Assessment
 - Appendix D – Heritage Assessment
 - Appendix E - Air Quality Assessment

4.5.2 A letter was sent to the Agent on 9th July 2018 (CD 1.4) acknowledging that Wrexham County Borough Council received the application on 4th July 2018. No validation queries were raised on the application.

4.6 Presentation to Landscape and Heritage Consultees

4.6.1 A meeting was organised by the WCBC on the 21st August 2018 to discuss the planning application with the consultees concerned with potential landscape and heritage effects and the planning officer. The attendees at this meeting included the following people/representatives from the following organisations:

- WCBC Conservation and Environment Lead;
- National Trust;

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- Canal and River Trust; and
 - Clwydian Range and Dee Valley Area of Outstanding Natural Beauty.

4.6.2 At this meeting the Appeal Proposal was presented by the Applicant and the potential for landscape and heritage impacts was discussed amongst the attendees. No issues were raised which required provision of written technical responses or provision of additional information.

4.7 Consultation Responses

4.7.1 Consultation responses were received from the following organisations:

- Clwydian Range and Dee Valley AONB Joint Committee (CD 2.1);
- Cadw (CD 2.2);
- Canal and River Trust (CD 2.3);
- Clwyd-Powys Archaeological Trust (CD 2.4);
- WCBC Environmental Protection (CD 2.5);
- WCBC Highways 12th November 2018 (CD 2.6);
- WCBC Highways 22nd February 2019 (CD 2.7);
- Health and Safety Executive (CD 2.8);
- National Trust (CD 2.9);
- Natural Resources Wales (CD 2.10);
- Wales and West Utilities (CD 2.11);
- Welsh Government Department for Economy and Infrastructure (as Strategic Highway Authority) (CD 2.12); and
- Welsh Water (CD 2.13).

4.7.2 No objections were received from the consultees with the exception of WCBC Highways and the National Trust.

4.7.3 The objection raised by WCBC Highways was in relation to concerns of queueing on the B5070 Holyhead Road. These matters are detailed in full in Section 7.0. A resolution was reached with WCBC highways before the application was taken to planning committee enabling the objection to be removed subject to the use of planning conditions.

4.7.4 An objection was raised by National Trust on 11th July 2018. The Applicant met with the National Trust and partner organisations in the World Heritage Site and

AONB to discuss the proposals. Whilst the objection was not removed the Appellant demonstrated to the National Trust that cumulative landscape issues had been considered and that there was very limited visibility of the Appeal Proposal from the National Trust property (reference to the ZTV and photomontages contained within Appendix A to the Planning Statement (CD1.1ii).

- 4.7.5 The committee report confirms that 29 letters of objection were sent by members of the public to WCBC in relation to the Appeal Proposal. These objections relate to noise, air quality and highways amenity.

4.8 Committee

- 4.8.1 The committee report (CD1.3) confirmed the officer's view that the Appeal Proposal would not be to the detriment of the local heritage assets and that highways amenity concerns have been resolved. The officer also recognised that the Appeal Proposal is part of an improvement programme to ensure the long-term viability of the manufacturing facility and deliver environmental improvements. In light of the above, the Appeal Proposal was taken to committee with an officer recommendation for approval.
- 4.8.2 The planning application was considered at committee on 4th March 2019. Despite the views of the Council's highways officers the members remained concerned about highways matters and resolved to defer the application to allow the Applicant time to consider an alternative means of access into the site (CD1.3).

4.9 Post-Committee

- 4.9.1 In light of the reason for deferring the application, a meeting was held on 27th March between the Appellant and WCBC to discuss the deferment of the application decision.
- 4.9.2 The potential to develop a new additional access into the northern area of the Kronospan manufacturing site from Holyhead Road was discussed.
- 4.9.3 The Local Highways Authority (WCBC Highways) and the Strategic Highways Authority (Welsh Government) did not object to the proposals from a highways perspective and therefore there was no material planning reason need to deliver a new access. Nonetheless, Kronospan were content to explore the potential of a new access to alleviate local concerns over highways matters.

4.9.4 The delivery of an alternative access would require a standalone planning application and would require assembly of land to deliver the access road. Kronospan could not postpone the determination of the OSB application whilst these matters were resolved and therefore it was concluded that it would be necessary to appeal against non-determination. Kronospan remain committed to progressing plans for a potential alternative access road but independent from the determination of the OSB application.

5.0 THE DEVELOPMENT PLAN

- 5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act (September 2004) and paragraph 1.21 of Planning Policy Wales (Edition 10 – December 2018) (PPW) requires that applications for planning permission should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.1.2 In the case of the Appeal Proposal the relevant statutory Development Plan (CD 3.1) comprises the Wrexham Unitary Development Plan (UDP) 1996-2011, which was adopted on the 14th February 2005.
- 5.1.3 The relevant policies of the UDP have been identified as follows:
- PS1: Settlement Limits
 - PS2: Development of the Environment
 - PS3: Strategic Policy
 - PS4: Development and the Transport Network
 - GDP1: Development Objectives
 - EC5: Special Landscape Areas
 - EC6: Biodiversity Conservation
 - EC7: Conservation Areas
 - EC11: Archaeology
 - E4: Employment Development (of un-annotated land) within Settlements
- 5.1.4 The Council are in the process of preparing a Local Development Plan (LDP) which will replace the adopted UDP. The Council first submitted a LDP (referred to as LDP1) to the Welsh Government for Examination in September 2011. However, due to fundamental concerns, principally relating to housing provision, raised by the Planning Inspector conducting the examinations, the hearing sessions were suspended and the LDP was withdrawn in March 2012.
- 5.1.5 The Council are now in the process of preparing a replacement LDP (referred to as LDP2) which would cover the period up to 2028. The Wrexham Local Development Plan 2013 – 2028 was placed on deposit in March 2018. The Council submitted the LDP2 (CD 3.3) for examination on 30th November 2018. Following consideration of all representations on the Deposit Plan, WCBC are proposing Focussed Changes

to the Deposit Plan to ensure it is sound. The Focussed Changes and Minor Editing Changes (CD 3.4) were consulted on between 7th January and 18th February 2019.

5.1.6 *R v Rochdale MBC, ex parte Milne (No 2) [2001] Env. LR 22* makes it clear that compliance with the development plan is to be interpreted as a compliance with the plan as a whole. This compliance is to be judged on the basis of the policies contained in the plan, *“it is enough that the proposal accords with the development plan considered as a whole. It does not have to accord with each and every policy therein”*.

5.1.7 The Planning Statement submitted in support of the planning application (CD 1.1ii) included an appraisal of the relevant policies of the UDP. The appraisal concluded that the development either conforms with, or supports the objectives of, all of the identified relevant planning policies. Nonetheless, the following sections provide a brief assessment of the Appeal Proposal against the most relevant policies of the development plan.

Part 1: Strategic Policies

5.1.8 Part 1 of the UDP sets out 12 strategic development policies. Only those policies related to the broad location of development are considered relevant to the appeal i.e. Policy PS1, PS2, PS3 and PS4.

5.1.9 It should be noted that the supporting text to the Strategic Policies states that:

Inside settlement boundaries, development will normally be acceptable provided it accords with the built environment policies in Part 2 of the Plan and complies with the Council's supplementary planning guidance and adopted standards listed in Appendix III.

Policy PS1 and PS2

5.1.10 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. The policies are worded as follows.

Policy PS1 New development for housing, employment, and community services will be directed to within defined settlement limits/employment areas.

Policy PS2 Development must not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment.

- 5.1.11 The Appeal Proposal is located within the settlement limits of Chirk and therefore it clearly complies with this policy.
- 5.1.12 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 Appeal Proposal would be located within the footprint of the existing particleboard manufacturing facility, adjacent to other long established buildings in the south western corner of the Kronospan site.
- 5.1.13 Supporting assessments have been provided with the Planning Statement (CD 1.1ii) which establish there would be no significant effects in relation to noise or air quality. Furthermore, the development would also need to comply with an Environmental Permit for the facility. A detailed landscape assessment (CD 1.1ii, Appendix A) has been conducted and is supported by a number of photomontages. This shows that the Appeal Proposal would not materially detrimentally affect the landscape/townscape character.
- 5.1.14 It is on this basis that it is concluded that the Appeal Proposal would not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment and so would be in compliance with Policies PS1 and PS2.

Policy PS3

- 5.1.15 Policy PS3 is worded as follows:

Development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land, wherever possible, particularly so where greenfield land is of ecological, landscape or amenity value, or comprises agricultural land of grades 1, 2 or 3a quality.

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- 5.1.16 The Appeal Proposal is located on previously developed land (as defined on page 38 of PPW) and as such is in accordance with policy PS3.

Policy PS4

- 5.1.17 The policy is worded as follows:

Development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car.

- 5.1.18 The Appeal Proposal is located within the existing Kronospan site on previously developed land and would maintain the existing settlement pattern and character. The staff operating the OSB would rely upon the same transport network as the existing employees. This has been examined in the Transport Assessment which concludes that the site represents a sustainable location for an employment development, being located within an acceptable walk/cycle catchment of local residential areas, as well as being accessible by both bus and rail services to/from key local settlements slightly further afield. These services are anticipated to reduce the need for employees at the Appeal Proposal to utilise the car for commuting journeys.
- 5.1.19 The Appellant intends to maximise the use of the existing railhead and sidings for the importation of timber for the manufacturing process, has an existing contract with a rail freight operator and has discussed their freight requirements with Transport for Wales.
- 5.1.20 The building has been designed to match the existing structures on site and would be an extension to an existing warehouse, located amongst other long established buildings. As such the development would maintain the existing settlement pattern and character. Being located within the existing Kronospan site it would be served by the existing transport network to the site.
- 5.1.21 As such, the Appeal proposal is in accordance with Policy PS4.

Part 2 Specific Development Policies

- 5.1.22 The following sections examine the specific development policies included within the UDP. These policies expand on the strategic vision for the borough and provide

detailed guidance for the development and other use of land. Only those policies considered particularly relevant to the Appeal Proposal have been assessed.

GDP1 – Development Objectives

5.1.23 The following sections consider the 11 limbs of policy GDP1.

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.

5.1.24 The Appeal Proposal is a functional development to enable the Kronospan site to manufacture OSB. The pattern and form of development associated with the location of the Appeal Proposal is absolutely clear. It will be an extension to an existing factory building and is located in the heart of an extensive industrial site within which there are numerous large buildings, tall and prominent industrial process equipment, raw material stockpiles and other industrial infrastructure.

5.1.25 The Appeal Proposal would be consistent with the existing development in terms of cladding and finish and comparable in scale to other nearby structures and buildings. In this regard the design of the facility responds to its setting by ensuring that it is congruous with the surrounding environment. Importantly the existing influence of the industrial site would not be altered or extended.

5.1.26 The LVIA (Appendix A to the Planning Statement ref. CD 1.1ii) concludes:

The Proposed Development would be introduced into an existing large-scale industrial site that is an established influence upon the town of Chirk and the surrounding rural area. 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. Several of the existing structures are considerably taller and bulkier than the Proposed Development and would often screen views of the Proposed Development from the surrounding area. The surrounding landform and vegetation cover would also provide significant screening. In this context, 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.

- 5.1.27 There have been no objections raised in relation to design and landscape impact from Natural Resources Wales, the Canal and Rivers Trust, Clwyd-Powys Archaeological Trust, Cadw or the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty Joint Committee.
- 5.1.28 On the basis of the foregoing it is the Appellant's case that the Appeal Proposal is not contrary to the first limb of Policy GDP1.
- b) Take account of personal and community safety and security in the design and layout of development and public / private spaces.*
- 5.1.29 The building has been designed to ensure the safety of operatives and other workers at the Kronospan site and has complied with Building Regulations standards.
- 5.1.30 The building is located within the secured Kronospan site and therefore it would not present any safety or security issues in relation to the community or public.
- c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources.*
- 5.1.31 The Appeal Proposal is located to serve a particular manufacturing process and as such its siting and orientation is determined by its function. The development is being proposed as part of a site wide improvement scheme which aims to increase the efficiency of operations at the site. Accordingly the development would lead to a more efficient use of resources, which may include a reduction in the use of energy and water per unit of output from the plant.
- d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.*
- 5.1.32 The Appeal Proposal would not result in additional pedestrian or vehicular access to the site and so would not have an effect on these matters in the nearby locality. It has been agreed with WCBC that a Traffic Management Plan would be implemented and an additional weighbridge would be provided to reduce the risk of queueing on the B5070 Holyhead Road. Both of these measures are proposed to be subject to planning conditions and are not objected to by the Appellant.
- 5.1.33 As is the case with other operational buildings on site, measures would be included to safeguard the movement of pedestrians within the warehouse.

e) Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible.

- 5.1.34 The Appeal Proposal is located within the operational site which is served by existing public transport facilities and pedestrian and cycle routes leading directly to the staff entrance of the main manufacturing site.

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.

- 5.1.35 The Kronospan Vision 2020 projects will provide overall improvements in terms of air quality and noise emissions. In terms of the OSB production facility, the improvements undertaken and proposed to date would ensure that the manufacture of OSB would not result in any additional adverse effects in respect of noise and air quality.

- 5.1.36 The Kronospan site is currently operated under two Environmental Permits which are in place to protect the safety and amenity of the public and safeguard the environment. A substantial variation application (Reference: EA/EPR/BW9999IG/V003) has been submitted to Natural Resources Wales and is in the process of being determined, this application includes the operation of the OSB line. If granted this permit would bring the site under a single regulator.

g) Secure public services (e.g. gas, water, electricity) to development at minimum public cost.

- 5.1.37 All service connections would be internal to the site and would not result in any public costs.

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.

- 5.1.38 The development would occur on a previously developed area of the land that has no nature conservation or 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.

5.1.39 As noted above the Appeal Proposal is located within a previously developed area of the site. As such the development would not result in, or be subject to flooding, soil erosion, landslides or contamination, either on or off the site.

j) Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity from development that could harm this identity.

5.1.40 The development would not have an effect on this element of the policy.

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

5.1.41 The Appeal Proposal forms part of an ongoing programme of improvements at the site which are being undertaken to secure the long term future of this important local business that provides over 650 jobs to local people. The Appeal Proposal is one of four major projects proposed under the Kronospan Vision 2020 programme. Although it would perform an operational role separate to the other projects, all of the Kronospan 2020 programme projects are critical to the future sustainability and economic viability of the business at the Chirk site.

5.1.42 The business also makes a significant contribution to the local, regional and national economy through supply chain opportunities and development projects such as the Appeal Proposal.

Conclusion on GDP1

5.1.43 It has been demonstrated that the development accords with or is neutral in respect of each of the limbs of Policy GDP1. As such it meets the general development objectives for new development within the borough.

EC5 Special Landscape Areas

5.1.44 The wording of policy EC5 is as follows:

Within [our emphasis] Special Landscape Areas, priority will be given to the conservation and enhancement of the landscape. Development, other than for agriculture, small-scale farm-based and other rural enterprises, and essential operational development by utility service providers, will be strictly controlled. Development will be required to conform to a high standard of design and landscaping, and special attention will be paid to minimising its visual impact both from nearby and distant viewpoints.

- 5.1.45 The Appeal Proposal does not lie within a Special Landscape Area and as such the policy as worded does not apply to the development. The final sentence of paragraph 5.6, which forms supporting text to the policy, also makes reference to development ‘in such locations’ [when referring to areas of high landscape value], again reinforcing the fact that the policy relates to developments within Special Landscape Areas.

EC6 Biodiversity Conservation

- 5.1.46 The wording of Policy EC6 is as follows;

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. Where such development is permitted, damage should be kept to a minimum, and compensatory measures should be provided. Measures to improve the biodiversity value of sites and enhance their natural conservation interest and landscape quality including the establishment of local nature reserves, will be supported.

- 5.1.47 The Chirk Castle and Parkland Site of Special Scientific Interest is located approximately 500 metres west of the appeal site. The Appeal Proposal lies within the existing boundary of the Kronospan facility on an area currently occupied by manufacturing equipment. As such there would be no direct effects on the SSSI or any other designated site.

- 5.1.48 It can be concluded that the Appeal Proposal 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 Appeal Proposal and Policy EC6.

EC7 Conservation Areas

- 5.1.49 The wording of policy EC7 is as follows:

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. New buildings and alterations or additions to existing buildings in conservation areas, whether listed as of special architectural or historic interest or not, must reflect the design and character of the area as a whole and the form, scale, detailing and materials of existing buildings.

- 5.1.50 Chirk Conservation Area lies approximately 500m to the south of the Appeal Proposal.
- 5.1.51 An Assessment and Management Plan adopted in 2014 (CD 3.2) describes the key features and history of the Conservation Area. It recognises that to maintain a balance between the interests of conservation and the need for change and development.
- 5.1.52 The presence, and influence, of the existing Kronospan plant and operations are recognised in the Management Plan where it is observed that *“views of the village and the shallow valley are in places negatively influenced by industrial land use and associated structures, most prominently the factories of Kronospan and Mondelez which affect the rural landscape integrity, intrude within wider views and interrupt the visual links between the village and Chirk Castle”*.
- 5.1.53 There would be no development within the Conservation Area. Viewpoint A (Figure 2a contained in Appendix A to the Planning Statement (CD 1.1ii) and the Zone of Theoretical Visibility (Appendix 5 of Appendix A to the Planning Statement (CD 1.1ii) demonstrates that there would be very limited visibility of the Appeal Proposal from the Conservation Area. Where small parts of the building extension would be visible, this would appear visually as a very minor addition to the existing assemblage of structures, and would not stand out due to the recessive, dark green cladding, and to the greater size/ scale of existing structures.
- 5.1.54 On this basis it can be concluded that the Appeal Proposal would preserve the existing views and character of the Conservation Area and therefore would not be contrary to the policy.

Policy EC11

- 5.1.55 Policy EC11 relates to effects on Scheduled Ancient Monuments. The Pontcysyllte Aqueduct and Canal World Heritage Site is designated as a Scheduled Monument and as such this policy is considered relevant. The wording of Policy EC11 is as follows:

Development which would adversely affect the site or setting of a Scheduled Ancient Monument or archeological site of national significance will not be permitted. Development that directly affects non-scheduled sites of archeological importance will only be permitted if an archeological investigation has been carried out to determine the nature, extent and significance of the remains, and this

investigation indicates that in-situ preservation is not justified, and a programme of excavation and recording has been agreed. Development will also be carefully controlled to ensure that the setting of non-scheduled sites of archeological importance is not harmed where appropriate.

- 5.1.56 The Appeal Proposal would not have a direct impact on the Pontcysyllte Aqueduct and Canal Scheduled Monument. In relation to impacts on setting, Appendix D to the Planning Statement (CD 1.1ii) describes the visibility of the Appeal Proposal and the wider Kronospan development from the Pontcysyllte Aqueduct and Canal Scheduled Monument. It is noted that visibility of the Kronospan site as a whole is remarkably restricted, being screened by a combination of topography and mature vegetation. The Appeal Proposal would be partially visible through a break in tree cover along the canal towpath but this only occurs for a short section of the canal (less than 1km). Where visible, the OSB production facility would appear within the existing complex of industrial structures, not adding to the vertical or horizontal extent of the factory. The presence of the railway embankment adjacent to the canal towpath, and existing structures at Kronospan at short-range detract from the view.
- 5.1.57 The planting scheme set out in the Long Term Landscape Strategy, approved pursuant to Condition 5 of application reference P/2016/0219, CD 1.2, will assist in further reducing the visibility of the Kronospan complex over time.
- 5.1.58 Accordingly, it is concluded that the Appeal Proposal would not have a significant impact on the Outstanding Universal Value of the Pontcysyllte Aqueduct and Canal World Heritage Site and Scheduled Monument, the position also taken by Cadw in their consultation response to the planning application.

Policy E4

- 5.1.59 The wording of Policy E4 is as follows:

Employment development on unannotated land within settlement limits will be permitted subject to Policy GDP1.

- 5.1.60 As described above it is considered that the development complies with GDP1. The Appeal Proposal is for employment development and lies within the settlement limits of Chirk. As such, on the basis of this policy the Appeal Proposal should be permitted.

5.2 Emerging Development Plan

5.2.1 The Appeal Proposal has been appraised against the Wrexham Local Development Plan 2013 – 2028 Deposit Plan (hereafter referred to as ‘the Emerging LDP’) (CD 3.3). The Schedule of Proposed Focussed Changes and Minor Editing Changes to the Wrexham Deposit Local Development Plan 2013-2028 has been considered in this appraisal (CD 3.4).

5.2.2 The objectives of the Emerging LDP are contained within Chapter 4 of the document (CD 3.3). Strategic policies are set out in Chapter 5, these policies seek to deliver the vision, objectives and strategy set out within the document. Chapter 6 contains topic, criteria and area based policies. The relevant policies and objectives of the Emerging LDP are considered under the headings below.

Economy and Employment

5.2.3 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”.

5.2.4 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.

5.2.5 The Kronospan manufacturing 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 4,200 jobs in the County Borough over the Plan period.

5.2.6 The Appeal Proposal 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. The Appeal Proposal would enable Kronospan to introduce a third raw board process at the site and therefore enable Kronospan to further diversify and compete effectively with rival wood-based panel

manufacturing companies across Europe, contributing to the economic sustainability of this important local employer.

- 5.2.7 The policy and objectives centred on Economy and Employment therefore add weight to the policy support for the Appeal Proposal.

Natural Environment

- 5.2.8 Strategic Objective SO9 seeks to: “Protect, manage and enhance the natural and historic environment and landscapes”.
- 5.2.9 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.
- 5.2.10 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.
- 5.2.11 A Landscape and Visual Impact Assessment and Heritage Appraisal have been completed to support this application (Appendix A and D respectively to the Planning Statement (CD 1.1ii). The LVIA concluded that the additional presence of the Appeal Proposal 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 Appeal Proposal would be significant. The Heritage Assessment found that the Appeal Proposal would have no impact on the heritage significance of the local cultural heritage resource.
- 5.2.12 As set out previously there have been no objections raised in relation to design and landscape impact from Natural Resources Wales, the Canal and Rivers Trust, Clwyd-Powys Archaeological Trust, Cadw or the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty Joint Committee.
- 5.2.13 Policy SP15: Natural Environment sets out that development would only be supported where it protects conserves and enhances the natural environment. The Appeal Proposal would have no direct effects on any ecological features. The indirect effects of emissions to air from the Appeal Proposal have been considered

in the Air Quality Assessment submitted as Appendix E to the Planning Statement (CD 1.1ii). This demonstrates that the Appeal Proposal would not result in any significant effects on nearby nationally or internationally designed conservation sites.

- 5.2.14 Policy SP16: Historic and Cultural Heritage sets out that development would only be supported where it protects conserves, protects and enhances cultural and heritage assets. A Heritage Assessment is contained in Appendix D of the Planning Statement (CD 1.1ii). This assessment concluded that the Appeal Proposal would have negligible impact on the heritage significance of the local cultural heritage resource including the Pontcysyllte Aqueduct and Canal WHS and Scheduled Monument, Chirk Castle Historic Park & Garden and Chirk Conservation Area.
- 5.2.15 For the aforementioned reasons the Appeal Proposal is in accordance with the main relevant policies and objectives relating to the natural environment.

Development Management

- 5.2.16 Policy DM1: Development Management Considerations builds on the current General Development Principles policy (Policy GDP1) contained within the UDP. Policy DM1 sets out 12 general criteria development must fulfil. Criteria a) – e) and i) are considered to reflect criteria contained in GDP 1 and are therefore considered to have been dealt with above. Criteria f), g), h), j) and k) are new to Wrexham's local planning policy and have not been considered before. As such, an appraisal of these criteria is provided in the subsequent paragraphs.
- 5.2.17 Criteria f) of emerging policy DM1 requires that, where relevant, all development must *"Not give rise to parking or highway safety problems on site or in the locality"*. The impact of the Appeal Proposal on the local highway network has been considered in the Transport Assessment submitted as Appendix B to the Planning Statement (CD 1.1ii) and the subsequent Technical Note (CD 1.6). These assessments conclude that the Appeal Proposal would not give rise to anything other than a negligible impact on local highway network operation. A Traffic Management Plan (CD 1.5) has been developed to overcome periodic issues with queues of HGVs turning right into the site. Furthermore, as detailed in Section 7.0, a resolution on highways matters had been reached between the Appellant and WCBC Highways prior to planning committee. In light of the above, the Appeal Proposal is considered to be in accordance with criteria f).

- 5.2.18 Criteria g) requires that sustainable travel choices are maximised before providing for car related needs. The Appeal Proposal is located within walking and cycling distance of the nearby working population. The Appellant intends to maximise the use of the existing railhead and sidings for the importation of timber for the manufacturing process. 38% of materials would be imported by rail, equivalent to 39 HGV loads per day. In light of the above it is considered that the requirement of criteria g) is met with regard to the Appeal Proposal.
- 5.2.19 Criteria h) requires that, where relevant, development must “*contribute to low carbon economies through energy efficiency, be designed to minimise the use of non-renewable energy, water and the production of waste both during construction and when in use*”. The Appeal Proposal would produce OSB which the Appellant considers to be a material fundamental for the provision of new affordable houses, particularly for residential schemes capable of easing the UK’s housing deficit. Due to the carbon storage qualities of wood based panel, houses constructed from OSB are considered environmentally superior to those constructed using traditional construction products. OSB can also be produced using much younger and smaller trees than alternatives such as plywood which require larger diameter trees that take longer to grow. In light of the above, the Appeal Proposal is considered to be supported by criteria h). As mentioned above, Kronospan are committed to continuous environmental improvement and to utilising the railway sidings within the site for the delivery of raw materials.
- 5.2.20 Criteria j) requires that development must, where relevant, consider the needs of a diverse population, including those with protected characteristics. The Appeal Proposal would be located within an existing manufacturing facility and would form part of the manufacturing operational process. As such, the Appeal Proposal would not be accessible by the public and would only be accessed by Kronospan employees. As such, criteria j) is not considered relevant to the Appeal Proposal.
- 5.2.21 Criteria k) states that, where relevant, “*on sites which have previously been developed, new development proposals should make use of existing suitable building materials wherever possible for appropriate uses in order to re-use recyclable materials and reduce the amount of imported materials*”. The appeal site has been previously developed however the re-use of materials is not considered feasible. As such, the Appeal Proposal is considered to be neutral to this criteria.

- 5.2.22 It is considered that the Appeal Proposal satisfies all of the relevant requirements set out in the emerging policy.

5.3 Development Plan Conclusions

- 5.3.1 It has been demonstrated that the Appeal Proposal would be in accordance with all of the relevant policies of the Development Plan and as such the Appeal Proposal should be granted planning permission unless material consideration indicate otherwise.

6.0 MATERIAL CONSIDERATIONS

6.1 Introduction

- 6.1.1 Wood based panels and other wood products have been produced at the Kronospan manufacturing facility in Chirk since the start of operations in 1973. The existing production equipment has become dated and inefficient. As a consequence, there is a need to undertake significant investment to improve the productivity of the facility. The Appeal Proposal forms part of the Kronospan Vision 2020 investment programme, providing newer more efficient manufacturing equipment and improved product management.
- 6.1.2 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.
- 6.1.3 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). The Appeal Proposal will introduce a third raw board process to the site for the production of Oriented Strand Board (OSB).
- 6.1.4 This Section considers the benefits of the Appeal Proposal and documents which form material planning considerations, including national planning policy.

6.2 Benefits of the Appeal Proposal

The Characteristics of OSB

- 6.2.1 OSB is a malleable and strong board product used in the construction industry. OSB is considered to be an ideal substitute for plywood as it is less expensive and more environmentally sustainable because it can be made from small diameter trees that can be farmed. In contrast, plywood often requires larger diameter trees which have grown for longer.
- 6.2.2 Due to the carbon storage qualities of wood based panel, houses constructed from OSB are considered environmentally superior to those constructed using traditional construction products such as concrete blocks / brick. Kronospan considers the

increased use of OSB to be fundamental for the provision of new affordable houses, particularly for residential schemes capable of easing the UK's housing deficit.

- 6.2.3 Currently the UK imports most of the OSB it requires. The production of OSB by Kronospan will make a significant contribution to supplying the UK's demand for OSB and therefore reduce the UK's reliance on imports for this product. OSB is a low cost environmentally beneficial alternative to plywood and is considered vital for future house building requirements in the UK.
- 6.2.4 The addition of this product to the existing Kronospan range will enable Kronospan to further diversify and compete effectively with rival wood-based panel manufacturing companies across Europe, contributing to the UK balance of payments and economic sustainability of this important UK business.

Environmental Benefits

- 6.2.5 Kronospan is continuously implementing projects aimed at further improving environmental conditions at the site. These include a project to reduce emissions and occasional plume grounding, and the development of significant infrastructure to reduce fugitive dust emissions from the receipt, processing and storage of Recycled Fibre and storage of other raw product including wood chips, sawdust and bark. This latter project involves the construction of six storage silos on the Site, a project that has completed commissioning. This project has a total capital expenditure of £20 million and demonstrates the commitment of Kronospan to ensure continuous environmental improvement and respond to local environmental concerns. Kronospan are also implementing the Long Term Landscape Strategy (CD 1.2) which will deliver a programme of landscaping management and planting that would help mitigate views of the wider facility, including views of the Appeal Proposal.
- 6.2.6 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. The overall outcome of the ongoing improvement projects at the site will be to provide improvements in terms of air quality and noise, negligible impacts on the historic environment and no significant effects in terms of landscape and visual impacts. In terms of the OSB production facility the improvements undertaken and proposed to date e.g. log offloading facility, flaker facility and refurbished chipper, and raw product silos,

would mean the manufacture of this new product would not result in any additional adverse effects in respect of noise and air quality.

In terms of traffic and transport effects, the OSB manufacturing process would require the delivery of round wood to the site via rail and HGV. The use of the railway head for the delivery of raw material is intended to reduce the potential highway related effects of the development. The use of rail would avoid approximately 10,000 HGV deliveries per year when compared to a scenario where all of the wood was to be imported by road.

Employment Opportunities

- 6.2.7 Some of the improvements proposed at the site through the Kronospan 2020 Vision projects involve increased automation and improved manufacturing efficiency. As a result, when some of the other projects become operational and new manufacturing processes are established, less staff will be required to deliver the same or increased manufacturing output. The Appeal Proposal would create 100 new employment opportunities, and provide the necessary training to staff to facilitate the operation of the OSB production line. The jobs created by the OSB facility would more than offset the reduced staff numbers resulting from improved manufacturing efficiency in other areas of the site.
- 6.2.8 Accordingly, the OSB proposal is an opportunity for Kronospan to compensate for workforce reductions associated with other Vision 2020 projects and deliver on their commitment to ensuring that no overall job losses would result from the Kronospan 2020 programme. Furthermore, the continual improvement and diversification of the operations at the site would allow Kronospan to compete effectively with rival wood-based panel manufacturing companies across Europe, sustaining this important local business which would continue to provide employment to circa 650 staff and in turn the circa 6,000 plus people in the UK indirectly supported by its operations.

Social Benefits

- 6.2.9 The Appeal Proposal will contribute to maintaining the successes of the business and as such help to retain Kronospan within Chirk. The business has been operating within the town since 1973 and as the largest employer within the town it forms an important part of the social fabric of the settlement.

- 6.2.10 As outlined above the business provides employment to many people within the town and the surrounding area. Employment clearly contributes significantly to the economic status of communities but it also makes a significant contribution to social wellbeing as evidenced by research undertaken by the UK Government in 2013 into National Wellbeing (CD 4.1). The business also contributes to social programmes and community organisations within the town and prides itself in being part of the community of Chirk.
- 6.2.11 The business is located close to the centre of the town. Whilst this might cause some local concerns from time to time, the proximity of the business to the local population means that many of the employees are able to travel to work easily either on foot, by cycle or public transport.
- 6.2.12 It is evident that the business, and the role the Appeal Proposal will have in sustaining the business, makes an important social contribution to the borough and the town of Chirk.

Productivity

- 6.2.13 In 2017, labour productivity in Wales was 16% below the UK average¹. In Wales, the highest level of labour productivity was Flintshire and Wrexham, with a productivity level 4% below the UK average². The productivity index for England increased by an overall 0.1 index points during the period from 1997-2015 whereas the productivity index for Wales decreased by 6.2 index points during the same period³.
- 6.2.14 Weaknesses in productivity growth since the 2008/2009 recession have been attributed to several factors, including:
- Low levels of business investment for example, the resources and quality of equipment available to workers to produce output;
 - A lack of lending to more productive firms since the banking crisis;
 - The reallocation of employees within firms to less productive roles; and
 - Reduced rates of innovation and discovery⁴.

¹ *Regional and sub-regional productivity in the UK: February 2019 (CD 4.13)*

² *Regional and sub-regional productivity in the UK: February 2019*

³ *House of Commons Briefing Paper Number 06492, 20 September 2017, Productivity in the UK, By Daniel Harari (CD 4.12)*

⁴ *House of Commons Briefing Paper Number 06492, 20 September 2017, Productivity in the UK, By Daniel Harari*

- 6.2.15 As other industrial sectors in the UK have learned, manufacturing product outside the UK can be one way to reduce costs. The other is to invest in better and more efficient manufacturing techniques and to increase productivity. The OSB production facility comprises an investment in equipment and employee skills and is an example of how businesses should react to balance the decline in productivity experienced in Wales over the past two decades.
- 6.2.16 Through the 2020 Vision projects, Kronospan is seeking to maintain its market position in the UK by investing in the Chirk site. In doing so it is hoping to restore the manufacturing output achieved in the recent past and reduce its manufacturing costs. Together these are expected to secure the long term sustainability of the business and safeguard the direct and indirect jobs created by the plant.
- 6.2.17 Without investment in new manufacturing processes, reduced productivity could begin to have significant detrimental effects on the economics of the business at the Chirk site. Accordingly it is clear the Appeal Proposal is crucial to the future prospects of the manufacturing industry in Wales, which must increase its productivity in order to remain competitive in the wider UK, Europe and worldwide markets.

6.3 Planning Policy Material Considerations

- 6.3.1 In addition to the policies of the statutory Development Plan, the Appeal Proposal has also been considered in the context of other material planning policy considerations. These include (but are not necessarily limited to) the following:
- Well-being of Future Generations (Wales) Act 2015;
 - Planning Policy Wales; Edition 10. December 2018 (PPW 10);
 - One Wales: One Planet. The Sustainable Development Scheme of the Welsh Assembly Government (May 2009);
 - People, Places, Futures. The Wales Spatial Plan 2008 Update (July 2008);
 - Technical Advice Note (TAN) 12: Design (2016);
 - Technical Advice Note (TAN) 23: Economic Development (2014);
 - Technical Advice Note (TAN) 24: The Historic Environment (2017);
 - Wrexham County Borough Council - Council Plan 2017-22 (2017) & Economic Prosperity Strategy 2012-2016
 - Local Planning Guidance Note No. 26
 - Local Planning Guidance Note No. 33.

6.3.2 The above documents are considered under the headings below.

Well-being of Future Generations (Wales) Act 2015 (CD 4.2)

6.3.3 The Well-being of Future Generations (Wales) Act 2015 (the Act) is concerned with improving the social, economic, environmental and cultural well-being of Wales. It requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change.

6.3.4 The Act puts forward seven well-being goals which all public bodies listed in the Act (including Local Authorities) must work towards achieving. The seven goals are:

- A prosperous Wales;
- A resilient Wales;
- A healthier Wales;
- A more equal Wales;
- A Wales of cohesive communities;
- A Wales of vibrant culture and thriving Welsh language; and
- A globally responsible Wales.

6.3.5 The Act requires that public bodies operate through a sustainable development process to improve the economic, social, environmental and cultural well-being of Wales.

6.3.6 It is considered that the Appeal Proposal would contribute to the well-being goals set out in the Act in the following ways:

- Contribution to the long term viability of an important local and national employer;
- Contribute to an increase in the productivity of the manufacturing site;
- Develop the skill set of the workforce at Kronospan by training staff to operate a new manufacturing process;
- Increase the competitiveness of Kronospan in the wood based panel market;
- Enable Kronospan to offset a reduction in employment opportunities which may occur as a result of the modernisation and efficiencies being made in other areas of the manufacturing site;
- Manufacturing of a product in the UK which is usually imported;

- The utilisation of existing developed land within the existing Kronospan manufacturing site to deliver the above benefits.

6.3.7 In light of the above, the Appeal Proposal is considered to be in accordance with the principles set out in the Well-being of Future Generations (Wales) Act 2015.

Planning Policy Wales (Edition 10, December 2018) (CD 4.3)

6.3.8 The primary objective of PPW 10 is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.

6.3.9 The most relevant parts of PPW 10 are:

- Well-being of Future Generations;
- Maximising Well-being and Creating Sustainable Places through Placemaking;
- Key Planning Principles – Achieving the Right Development in the Right Place;
- Economic Infrastructure – Economic Development; and
- Distinctive and Natural Places

Recognising the Special Characteristics of Places

- The Historic Environment
- Landscape
- Biodiversity and Ecological Networks

Recognising the Environmental Qualities of Places

- Air Quality and Soundscape

Well-being of Future Generations

6.3.10 The Well-being of Future Generations Act 2015 requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural.

6.3.11 The introductory chapter to PPW 10 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.”

- 6.3.12 The well-being goals are shown on PPW 10 Figure 2. PPW 10 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.”

- 6.3.13 As set out previously the Appeal Proposal will make a valuable contribution to the well-being goals by helping to improve the efficiency and long term success of this important local and national manufacturing facility. The various environmental effects of the Appeal Proposal have been assessed and WCBC and the Statutory Consultees to the application have not identified any unacceptable social, economic, environmental and cultural effects.

Maximising Well-being and Creating Sustainable Places through Placemaking and the Key Planning Principles - Achieving the Right Development in the Right Place

- 6.3.14 Paragraph 2.8 confirms that planning policies, proposals and decision must seek to promote sustainable development and support the well-being of people and communities across Wales. This Section encourages a ‘place-making’ approach to the planning of development which holistically considers the context, function and relationships between a development site and its wider surroundings.

- 6.3.15 The Key Planning Principles include ‘Growing our economy in a sustainable manner’. This principle states:

“The planning system should enable development which contributes to long term economic well-being, making the best use of existing infrastructure and planning for new supporting infrastructure and services”.

- 6.3.16 Paragraph 2.22 identifies key factors in the assessment of development proposals in terms of economic, social, environmental and cultural considerations. This list of factors highlights the Welsh Government’s aims to, amongst others, deliver sustainable employment opportunities, redress economic disadvantage, achieve economic growth and support a more prosperous, low carbon, innovative and resource efficient Wales.

- 6.3.17 Through the development of the Kronospan manufacturing facility since its establishment in 1970's, and the numerous planning applications that have been prepared and submitted in recent years, the relationship between the Appeal Proposal and its surroundings is well understood. Assessments have been undertaken to consider the potential environmental effects of the Appeal Proposal. These assessments have demonstrated that the Appeal Proposal would not give rise to any significant adverse effects on the environment. The Appeal Proposal 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.
- 6.3.18 The Appeal Proposal would be located with the footprint of the existing manufacturing facility and would utilise much of the existing manufacturing infrastructure. As such it is considered that the development would help maximise the resources already in place at the site. Various technical assessments have been conducted to ensure that the development would not give rise to unacceptable effects on the local environment and the manufacturing processes would be fully regulated under an Environmental Permit. As such, it is considered that the development would be in line with para 2.8 by maximising the social, economic, environmental and cultural benefits, while considering potential impacts of the development.
- 6.3.19 Figure 3 of PPW sets out the 'Key Planning Principles – Achieving the Right Development in the Right Place'. It is considered that the Appeal Proposal accords with the 5 principles set out in the figure by:
- i) Helping to grow the local and national economy by helping to ensure the long term sustainability of the manufacturing facility and delivering new jobs to the site
 - ii) Making best use of resources by developing a new OSB manufacturing facility at an existing board manufacturing plant which already has much of the infrastructure in place required to produce OSB product
 - iii) Helping facilitate accessible and healthy environments by locating development on an existing developed site, within walking and cycling distance of the nearby working population.
 - iv) Helping sustain local jobs at a site which provides circa 650 direct employment opportunities to the local community and over 6,000 jobs in the UK indirectly supported by Kronospan's operations

- v) Providing an assessment of effects on natural, historic and cultural assets the Appeal Proposal has been shown to not have any significant or unacceptable effects on these assets.
- 6.3.20 Based on the foregoing it is clear that there is support available for the Appeal Proposal from this part of PPW 10.

Economic Development

- 6.3.21 Chapter 5 of PPW, 'Productive and Enterprising Places', covers the economic components of placemaking. One of the goals of the Well-being of Future Generations Act is for a Prosperous Wales and page 74 states that this can be achieved through increased economic activity across all sectors and at all scales.
- 6.3.22 The Welsh Government defines economic development as "*the development of land and buildings for activities that generate sustainable long term prosperity, jobs and incomes*".
- 6.3.23 Paragraph 5.4.9 states that it is important that planning authorities are aware not only of the economic needs of their own areas but also of the surrounding region. Paragraph 5.4.10 requires that development and investment are directed to the most sustainable locations.
- 6.3.24 As set out previously within this statement, the Kronospan manufacturing facility as a whole is an established manufacturing facility offering significant employment opportunities to the local area and significant economic benefits to Wrexham and Wales. The Appeal Proposal would ensure that there would be no overall reduction in employment opportunities at the facility resulting from the Kronospan 2020 Vision programme. The Appeal Proposal would assist the long term sustainability of the business in Kronospan by enabling the company to diversify the operations at the Chirk site. This would also result in training opportunities for staff to facilitate the operation of the OSB production line.
- 6.3.25 In light of the above, the Appeal Proposal is considered to be in line with the aspirations of PPW 10 in terms of economic development.

Distinctive and Natural Places

- 6.3.26 Chapter 6 of PPW covers 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 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. No significant effects have been identified by the assessments and there were no objections to the planning application from WCBC Highways; Welsh Government Department for Economy and Infrastructure in respect of the strategic highway network; Clwyd-Powys Archaeological Trust; Cadw; Canal and River Trust; WCBC Environmental Protection; Health and Safety Executive; Natural Resources Wales; and Clwydian Range and Dee Valley AONB Joint Committee.

- 6.3.27 In this regard the Appeal Proposal accords with the policies set out in Chapter 6 of PPW.

PPW Conclusion

- 6.3.28 The Appeal Proposal would contribute to each of the national policies outlined above and it has been established that the proposals represent Sustainable Development.
- 6.3.29 The Appeal Proposal would result in a number of benefits to the manufacturing process, enabling Kronospan to diversify into the production of a new raw board product. The introduction of this new production line would ensure that no overall job losses occur as a result of the Kronospan Vision 2020 improvement projects. The Appeal Proposal would therefore help secure the ongoing success of this important local employer and reduce the UK's reliance on European imports for OSB.
- 6.3.30 The overall outcome of the ongoing improvement projects at the site would be to provide improvements in terms of air quality and noise, negligible impacts on the historic environment, no significant effects in terms of landscape and visual impacts and enable Kronospan to maintain its current employment levels. The assessments demonstrate that the improvements undertaken and proposed to date will ensure that the manufacture of this new product would not result in any additional adverse effects in respect of noise and air quality.
- 6.3.31 On the basis of the foregoing it is considered that the Appeal Proposal is in accordance with the national planning policies set out above.

‘People, Places, Futures’: The Wales Spatial Plan 2008 Update (July 2008)
(CD 4.5)

6.3.32 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;”

6.3.33 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”.

6.3.34 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 Appeal Proposal would ensure that there are no overall job losses resulting from the Kronospan 2020 improvement programme. Clearly the Kronospan facility, and therefore the contribution that the Appeal Proposal 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) (CD 4.4)

6.3.35 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”.*

6.3.36 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 facility 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*.

Technical Advice Note (TAN) 12: Design (2016) (CD 4.6)

6.3.37 TAN 12 provides advice in respect of delivering good sustainable design. The planning application was accompanied by a Design and Access Statement (CD 1.1iii) which describes the approach undertaken to the design and considers Access and Movement, Character, Community Safety and Environmental Sustainability.

6.3.38 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”.

6.3.39 The Appeal Proposal is a functional development that will house equipment to enable OSB to be produced at the Chirk site. Other than ensuring that the building meets its functional requirements to enable it to fulfil its role in the site’s manufacturing process, 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.

6.3.40 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 townscapes, 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

- 6.3.41 The Appeal Proposal comprises an extension to the existing chipboard press hall and a new building and process equipment adjacent to the existing buildings, in an area of the site already occupied by wood chip processing equipment. 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) (CD 3.2).
- 6.3.42 The Appeal Proposal would be consistent in height with the surrounding structures. As set out in Section 3.2, the Appeal Proposal would be clad in Olive Green 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.
- 6.3.43 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.
- 6.3.44 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 A and a Heritage Assessment is contained in Appendix D of the Planning Statement (CD 1.1ii). These assessments concluded that the additional presence of the Appeal Proposal 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. No objections were received from Clwyd-Powys Archaeological Trust; Cadw; Canal and River Trust; Natural Resources Wales; and Clwydian Range and Dee Valley AONB Joint Committee.

Technical Advice Note (TAN) 23: Economic Development (2014) (CD 4.7)

- 6.3.45 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.
- 6.3.46 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”.
- 6.3.47 Kronospan’s investment strategy, Kronospan Vision 2020, sets out their 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.
- 6.3.48 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 650 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.
- 6.3.49 The Appeal Proposal would enable Kronospan to introduce a third raw board process to their production operations and enable OSB to be produced at the site, rather than imported from Kronospan sites based elsewhere in Europe. Therefore the Appeal Proposal would contribute to Kronospan implementing its Kronospan Vision 2020, enabling the long term sustainability of the business to be secured, ensuring that the substantial economic benefits of the business continue to be realised.

Technical Advice Note (TAN) 24: The Historic Environment (2017) (CD 4.8)

- 6.3.50 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.
- 6.3.51 Paragraph 1.26 confirms that it is for the Applicant to “provide the local planning authority with sufficient information to allow the assessment of their proposals in respect of scheduled monuments, listed buildings, conservation areas, registered historic parks and gardens, World Heritage Sites, or other sites of national importance and their settings”.
- 6.3.52 A Heritage Assessment has been completed to assess the predicted impact of the Appeal Proposal on the setting of cultural heritage assets and potential cumulative impacts resulting from the combined operation of the Appeal Proposal and the other projects proposed under Kronospan Vision 2020. This assessment is contained in Appendix D of the Planning Statement (CD 1.1ii).
- 6.3.53 This assessment concluded that the construction and operation of the OSB facility would have negligible impact on the heritage significance of the local cultural heritage resource. No objections were received from Clwyd-Powys Archaeological Trust; Cadw or the Canal and River Trust.

Wrexham County Borough Council - Council Plan 2017-22 (2017) & Economic Prosperity Strategy 2012-2016 (CD 4.9)

- 6.3.54 The need to encourage economic development in the borough is set out within the Council Plan 2017-22, specifically within the Economy Strategic Theme section of the report. The three priority outcomes within the Economy Strategic Theme are set as:
- E1 – Encouraging people to live, work, learn, visit and invest here
 - E2 – Supporting businesses to locate and grow here
 - E3 – Helping tackle poverty

- 6.3.55 Wrexham Borough Council's Economic Prosperity Strategy expands on the three priority outcomes listed above. It sets out the vision of how these outcomes will be achieved. The document acknowledges that there are 816 less businesses in Wrexham in 2016 than there were in 2005. As such there is a recognised need to attract and retain businesses within the borough.

Local Planning Guidance Note No. 26 – Landscape and Industrial Development (CD 4.10)

- 6.3.56 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.
- 6.3.57 As described in Section 5 of the Planning Statement, the Appeal Proposal would typically result in only a minor change to the arrangement of elements within the wider site. The Appeal Proposal would not alter or extend the existing influence of the industrial site.
- 6.3.58 An earth bund planted with trees has been developed along the eastern perimeter of the Kronospan manufacturing 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 WCBC pursuant to Condition 5 of application reference P/2016/0219 (CD 1.2). 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 Appeal Proposal.
- 6.3.59 As described in Section 2 above the Appeal Proposal would be located adjacent to other long established buildings in the south western corner of the Kronospan site. These buildings and structures are Goosewing Grey in colour. For the reasons set out in Section 3.2, the colour of the cladding proposed is Olive Green. However, should WCBC consider it more appropriate for the buildings and structures of the Appeal Proposal to be coloured Goosewing Grey then the Appellant would not object to this requirement. As such the Appellant does not object to the use of a planning condition to control the specification of the external facing and roofing materials.

- 6.3.60 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. 33 – Pontcysyllte Aqueduct & Canal World Heritage Site (CD 4.11)

- 6.3.61 The stated aim of the guidance note is to ensure the integrity of the Pontcysyllte Aqueduct and Canal World Heritage Site, its buildings, structures and landscape are maintained. It sets out the need to consider the impact of the Appeal Proposal on the World Heritage Site and its setting.
- 6.3.62 Appendix D to the Planning Statement (CD 1.1ii) contains a Heritage Assessment that considers the effect of the Appeal Proposal on the character of the WHS that accords with the Setting of Historic Assets in Wales (May 2017) guidance and the matters raised within Section 6 of Local Planning Guidance Note 33.
- 6.3.63 It demonstrates that views of the Kronospan Site from the canal are restricted, reflecting the fact that the canal runs through a tunnel and a deep cutting adjacent to the site, and the stretch of canal further to the north is lined with mature trees.
- 6.3.64 The photomontages contained in Appendix A of the Heritage Statement (Appendix D to the Planning Statement (CD 1.1ii) illustrate the limited visibility of the wider Kronospan site from the WHS itself. The Appeal Proposal would be heavily screened by vegetation and would only be seen against a back-drop of taller existing structures within the Kronospan factory.
- 6.3.65 The Kronospan site is more clearly visible from elevated viewpoints within the WHS buffer zone west of the canal. The Appeal Proposal would be visible from within the Buffer Zone for the WHS but only in combination with the existing Kronospan factory and not in locations that offer more informative views of the WHS. Where visible, the Appeal Proposal would appear within the existing complex of industrial structures, not adding to the vertical or horizontal extent of the factory.
- 6.3.66 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.
- 6.3.67 On this basis it is concluded that the Appeal Proposal 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. No objection to effects on the Pontcysyllte Aqueduct and Canal World Heritage Site were raised by Cadw.

As such the Appeal Proposal would meet the stated aim of Local Planning Guidance Note No. 33.

7.0 MATTERS RAISED DURING DETERMINATION PERIOD

- 7.1.1 A number of matters were raised during the determination period by consultees and members of the public. Officers of the Council were satisfied that the matters raised could be controlled through use of planning conditions or would be controlled via other regulatory regimes e.g. Environmental Permitting. Accordingly the officers recommended that planning permission should be granted.
- 7.1.2 It is considered that all relevant planning matters are adequately addressed in the planning application documentation. Nonetheless, the matters raised during the determination period by consultees and third parties are dealt with briefly below.

Highways

- 7.1.3 A Transport Assessment was submitted with the application as Appendix B to the Planning Statement (CD 1.1ii). Based on the forecast production levels it is envisaged that the Appeal Proposal would give rise to an additional 91 HGV loads per day, or 182 two-way HGV movements, across the local and strategic highway networks. The additional movements would result in 11 additional two-way HGV movements during the AM network peak hour (07:45-08:45) (5 in / 6 out), falling to 8 movements during the PM peak period (6:30-17:30). This represents a maximum of 1 additional HGV movement every 6 minutes. During the busiest hour of HGV movements (14:00-15:00) just 15 two-way movements are anticipated (8 in / 7 out), representing 1 additional HGV movement every 4 minutes.
- 7.1.4 Such increases in HGV levels are considered unlikely to have any notable effect on either the local or strategic highway network, either in operational or safety terms. Furthermore, the Kronospan site has historically generated HGV levels in excess of those currently experienced, as well as marginally in excess of those anticipated under future operation inclusive of the OSB facility scheme – 462 historically compared to 458 once the OSB facility is operational.
- 7.1.5 The Welsh Government (Department for Economy and Infrastructure) did not issue a directive in relation to the A5 trunk road (CD 2.12). As such effects on the A5 trunk road were deemed to be acceptable.
- 7.1.6 Two formal consultation responses and email correspondence have been provided by WCBC highways. The first response from WCBC highways was provided on 12th November 2018 (CD 2.6). This response raised concerns in relation to queueing on the B5070 Holyhead Road.

- 7.1.7 The Appellant provided a response to the WCBC setting out that the occasional reporting of queueing at the site entrance was a result of vehicle logistics within the site stemming from the various construction activities being undertaken to deliver the Kronospan 2020 works. The queueing experienced was not frequent and was not over extended period of time. Nonetheless Kronospan recognised that measures should be implemented to overcome this issue. As such a Site Traffic Management Plan was submitted by Kronospan (CD 1.5) on 30th November 2018 (CD 2.14).
- 7.1.8 On 10th December 2018 WCBC highways provided a further response (CD 2.15) raising new concerns about Kronospan's ability to import wood via rail due to restrictions on the Chester to Shrewsbury railway line.
- 7.1.9 A response to this concern was provided by the Applicant on 17th December 2018 (CD 2.16) setting out that the contract between Kronospan and Colas Rail (the rail operator which delivers logs to the Kronospan manufacturing site) enabled a greater volume of wood to be imported to the site that at present.
- 7.1.10 WCBC highways raised queries relating to the Traffic Management Plan (CD 1.5) submitted in November 2018) on 17th January 2019 (CD 2.17). These concerns related to the amount of parking available for lorry parking on the site, and a further query on whether there is sufficient capacity on the railway line to enable Kronospan to import a substantial proportion of raw materials via this transport mode and whether this capacity is safeguarded in perpetuity for Kronospan's use.
- 7.1.11 A response to address these queries was provided by the Appellant to WCBC highways on 21st January 2019 addressing all points raised (CD 2.18). The Appellant set out that it remained Kronospan's intention to import a significant proportion of the wood required for the OSB production by rail as this assists with production efficiency. However, in order to give comfort, the Appellant provided a technical note (CD 1.6) on the 22nd January 2019 (CD 2.19) assessing the potential traffic implications of all wood being imported by road. The technical note identified that if all of the wood was imported by road the AM peak movements would increase by 4 two-way movements and PM peak flows would increase by 3 two-way movements. The increased movements were concluded to give rise to a negligible impact on highway network operation.
- 7.1.12 On 14th February queries were raised by WCBC highways (CD 2.20) in relation to the responses provided by Kronospan on 21st January 2019 (CD 2.18) and 30th

November 2018 (CD 2.14). These queries related to the potential use of both weighbridges as a measure to reduce the likelihood of queueing on the B5070 Holyhead Road and observed queueing on the 6th November 2018. A response was provided to WCBC highways on 15th February 2019 (CD 2.21) setting out how the weighbridges at the site operate and that the additional queueing observed by the Council's highways officer occurred prior to the adoption of the processes set out in the Traffic Management Plan (CD 1.5).

- 7.1.13 Following receipt of this response, WCBC highways raised further minor queries in relation to queueing on 19th February 2019 (CD 2.22), these were addressed by Kronospan on 21st February 2019 (CD 2.23), providing further assurances that adequate systems were in place to manage occasional incidents which could lead to queueing at the weighbridge.
- 7.1.14 On 21st February 2019 WCBC development management suggested a condition (CD 2.24) requiring an additional weighbridge be provided, Kronospan responded on the same day to confirm that they would accept such a condition (CD 2.25).
- 7.1.15 On 4th March the application was taken to planning committee with an officer recommendation for approval. The planning officer's report to committee detailed the highways position and confirmed that a resolution on highways matters had been reached between the Applicant and the WCBC highways department.

Heritage

- 7.1.16 An assessment of the predicted impact of the Appeal Proposal on the setting of cultural heritage assets was undertaken and is provided as Appendix D to the Planning Statement (CD 1.1ii). The assessment was undertaken in accordance with the guidance relating to the setting of historic assets, *Setting of Historic Assets in Wales, May 2017*. This assessment identified that construction and operation of the Appeal Proposal would have no impact on the heritage significance of the local cultural heritage resource.
- 7.1.17 The Clwyd-Powys Archaeological Trust (CPAT) set out in their consultation response (CD 2.4) that whilst the Appeal Proposal would have no direct impact on any recorded archaeology, it may have a visual impact on the buffer zone of the Pontcysyllte Aqueduct and Canal World Heritage Site. CPAT therefore advised that Cadw are the primary consultee in this instance.

- 7.1.18 Cadw provided a consultation response on 25th October 2018 (CD 2.2). Within their response, Cadw acknowledge that whilst the Appeal Proposal would add additional large buildings to the site, it would not greatly increase the visual impact of the complex and would only have a slight impact on the Outstanding Universal Value of the World Heritage Site.
- 7.1.19 Cadw also state that the Appeal Proposal would be seen in combination with other existing structures at the Kronospan complex and that the cumulative effect of the proposals on setting are unlikely to have any more than a minor adverse impact which would not be considered significant.
- 7.1.20 The Canal and River Trust consultation response (CD 2.3) recognised that the Appeal Proposal would be sited within the main cluster of buildings at the Kronospan facility with no increase in height above the existing development at the site. As such the Appeal Proposal would have minimal impact on the canal corridor and the Canal and River Trust therefore had no further comment to make on the application.
- 7.1.21 The Officers report to the planning committee (CD 1.3) did not raise any material heritage concerns and heritage effects were not raised by members at the committee (CD 1.3).

Landscape

- 7.1.22 A Landscape and Visual Impact Assessment (LVIA) was provided as Appendix A to the Planning Statement (CD 1.1ii).
- 7.1.23 The LVIA concluded that the presence of the Appeal Proposal would not have a material effect upon either the statutory purposes or the special qualities of the AONB. In the context within which the Appeal Proposal would be located, the additional presence of the 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 Appeal Proposal would be significant.
- 7.1.24 The Clwydian Range and Dee Valley AONB Joint Committee (CD 2.1) acknowledges that the Appeal Proposal would be viewed in the context of the much larger existing Kronospan complex and the impact on the AONB would be no greater than at present.

- 7.1.25 National Trust objected to the Appeal Proposal on the 11th July 2018 (CD 2.9). However, they also welcomed further discussions on the implementation of the Long Term Landscape Strategy (CD 1.2). The Appellant met with the National Trust on the 21st August 2018 to discuss the application and provide feedback on the Long Term Landscape Strategy and their willingness to liaise and work with the National Trust to deliver the strategy.
- 7.1.26 The Officers report to the planning committee (CD 1.3) did not raise any material landscape concerns and landscape effects were not raised by members at the committee (CD 1.3).

Air Quality

- 7.1.27 An Air Quality Assessment (AQA) was provided as Appendix E to the Planning Statement (CD 1.1ii).
- 7.1.28 The potential environmental effects of the air emissions from the Appeal Proposal (in terms of both process and traffic emissions) on human health and ecological receptors have been assessed using detailed dispersion modelling.
- 7.1.29 A range of scenarios were modelled and reported. Furthermore, a series of conservative assumptions have been used in the modelling to provide a robust assessment. Taking into consideration the conservatism in the modelling, the significance of impact associated with the Appeal Proposal was concluded to be negligible.
- 7.1.30 Natural Resources Wales (NRW) made no objection to the Appeal Proposal in their consultation response (CD 2.10) and confirmed that the Nitrogen Oxide emission from road traffic and process contributions would be below 10% of the daily critical level for NO_x.
- 7.1.31 WCBC Environmental Protection consultation response (CD 2.5) acknowledges the varied permit would contain conditions to control emissions to air, land and water.
- 7.1.32 The Officers report to the planning committee (CD 1.3) did not raise any material air quality concerns.
- 7.1.33 However, there were a number of public representations which raised concerns in relation to air quality both in terms of the process emissions but also in relation to vehicle emissions from the increased number of HGVs accessing the site.

- 7.1.34 The AQA (CD 1.1ii) considered the impact of combined impact of process and traffic emissions. As set out above it concluded that the air quality effects of the Appeal Proposal would be negligible.
- 7.1.35 In relation to vehicle emissions the assessment identified that the increase in short term NO₂ concentrations associated with the increase in HGV flows is predicted to be less than 7% of the Air Quality Assessment Level at the centreline of the road. Therefore, this can be described as a negligible magnitude of change.
- 7.1.36 The increase in annual mean PM10 concentrations associated with the increase in HGV flows is predicted to be less than 0.5% of the AQAL at the centreline of the road. The maximum impact at receptors is around 0.2% of the AQAL. Therefore, this can be described as a negligible magnitude of change.

Noise

- 7.1.37 A detailed noise assessment was provided as Appendix C to the Planning Statement (CD 1.1ii).
- 7.1.38 The assessment demonstrated that the Appeal Proposal would not result in any background noise 'creep' in accordance with H3 Horizontal Guidance Note for Noise Part 2: Noise Assessment and Control and BAT.
- 7.1.39 On this basis it is concluded that noise levels from the Appeal Proposal, 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.
- 7.1.40 The conclusions of the Noise Impact Assessment is recognised in the response from WCBC Environmental Protection and no concerns in relation to noise impacts were raised.
- 7.1.41 In relation to changes in HGV flows the Design Manual for Roads and Bridges (DMRB) (Volume 11 Section 3 Part 7 HD 213/11) sets out that a change in noise level of 1 dB_{LA10,18h} is equivalent to a 25% increase or a 20% decrease in traffic flow.
- 7.1.42 The 2017 traffic survey identified 832 HGV movements between 07.00 to 19.00 along Holyhead Road. The Appeal Proposal would result in an increase (over a 24 hour period) of 182 movements, this represents an increase of 22%. Comparing 24 hour flows from the development with flows during the 12 hour survey period

provides a worst case assessment. Even on this basis the increase is less than 25% and therefore the change in noise level would be less than 1 dB_{LA10,18h}. This represents a negligible magnitude impact.

8.0 CONCLUSIONS AND SUMMARY

- 8.1.1 Kronospan is investing £200 million in the modernisation of its site in Chirk to ensure that the business has a vibrant future and remains operating in Chirk. To do that it has to ensure that it is able to deliver efficient, cost effective, productive and environmentally sympathetic production processes. The Appeal Proposal is key to enabling Kronospan to diversify by introducing a new raw board product and improve the productivity of the site.
- 8.1.2 OSB is currently mainly imported from European panel manufacturers. Producing OSB at Chirk would enable Kronospan to better react to market demands and ensure the continued ongoing success of Kronospan in the competitive market of wood-based board production. This would help sustain the long term future of this important local business which provides employment to circa 650 staff and in turn the circa 6,000 plus people in the UK indirectly supported by its operations. The Appeal Proposal would ensure that reduced staff numbers resulting from improved manufacturing efficiency in other areas of the site would be more than offset.
- 8.1.3 The Appeal Proposal comprises an investment in equipment and employee skills. Such investments are required to balance the decline in productivity experienced in Wales over the past two decades and enable manufacturing in Wales to remain competitive in the wider UK, Europe and worldwide markets.
- 8.1.4 The Appellant has made every effort to engage proactively with WCBC to provide further information when requested and reach agreement on planning conditions that would ensure the acceptability of the Appeal Proposal. This process led to the application being put before planning committee with a recommendation for approval.
- 8.1.5 Detailed assessment has been provided in respect of cultural heritage, landscape, air quality, noise and transport impacts. The assessments conclude that the Appeal Proposal would not increase the influence of the Kronospan facility on the AONB designation. Furthermore, the construction and operation of the Appeal Proposal would have no impact on the cultural significance of the Pontcysyllte Aqueduct and Canal WHS / Scheduled Monument, Chirk Castle Registered Park and Garden or Chirk Conservation Area.

- 8.1.6 In respect of air quality and noise, the assessments have found that the Appeal Proposal, when considered in isolation and cumulatively with the consented development, would not result in any significant effects.
- 8.1.7 The Transport Assessment and Highways Technical Note have confirmed that the Appeal Proposal would not result in anything other than a negligible impact on the local highway network operation. Furthermore, the Appellant would accept planning conditions requiring the implementation of an additional weighbridge prior to the operation of the Appeal Proposal.
- 8.1.8 The planning committee deferred the decision on the application to allow the applicant time to consider alternative means of access to the site. However, there were no technical highways reasons from an operational or safety perspective to refuse the application, as confirmed by the WCBC Highways Department and the Welsh Government. Furthermore, this Statement of Case has demonstrated that the additional traffic flows resulting from the Appeal Proposal would not result in any unacceptable noise or air quality effects. Therefore, it is the Appellant's case that there are no operational, safety or highways amenity issues which would warrant refusal of the application.
- 8.1.9 In examining the Appeal Proposal, it is the Appellant's case that the Appeal Proposal would help contribute towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.
- 8.1.10 The Appellant has demonstrated that the Appeal Proposal fully accords with the policies of the statutory development plan. In addition the Appellant has found no material considerations that indicate that the Appeal Proposal should be determined other than in accordance with the development plan. In fact those material considerations that have been identified weigh further in support of the proposal. Thus, in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, the Appellant contends that appeal should be allowed.