



PROPOSED GAS ENGINES, KRONOSPAN, CHIRK

LANDSCAPE AND VISUAL IMPACT ASSESSMENT

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1 Introduction

- 1.1 This Landscape and Visual Impact Assessment (LVIA) was undertaken by a Chartered Member of the Landscape Institute (CMLI). The LVIA follows best practice guidance set out in '*Guidelines for Landscape and Visual Impact Assessment*' (3rd edition 2013, Landscape Institute and Institute of Environmental Management and Assessment), hereafter referred to as the GLVIA.
- 1.2 Landscape and visual effects are separate, although closely related and interlinked issues.
- 1.3 Landscape effects are caused by physical changes to the landscape, which may result in changes to the distinctive character of that landscape and how it is perceived.
- 1.4 Visual effects are changes to what can be seen by people as a result of what is proposed. A visual assessment assesses the change in visual amenity undergone by people (either individually or in groups) that would arise from any change in the nature of views experienced.
- 1.5 The LVIA aims to establish the following:
- A clear understanding of the Site and its context, in respect of the physical and perceived landscape and in respect of views and visual amenity;
 - An understanding of the Proposed Development in terms of how this would relate to the existing landscape and views;
 - An identification of the likely significant effects of the Proposed Development upon the landscape and upon views, throughout the life-cycle of the Proposed Development;
 - Potential for mitigation to reduce / eliminate any potential adverse effect on the landscape or views arising as a result of the Proposed Development; and
 - A conclusion as to the residual likely significant landscape and visual effects of the Proposed Development.

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- 1.6 The process follows a standard approach, namely:
- The establishment of the baseline conditions, against which the effects of the Proposed Development will be assessed;
 - The determination of the nature of the receptor likely to be affected, i.e. its sensitivity;
 - The prediction of the nature of the effect likely to occur, i.e. the magnitude of change; and
 - An assessment of whether a likely significant landscape and visual effect would be experienced by any receptor, by considering the predicted magnitude of change together with the sensitivity of the receptor, taking into account any proposed mitigation measures.
- 1.7 Further details regarding the specific methodologies of assessment and determination of significance are included in Appendix 1. The LVIA has been informed by both desk and field based studies.
- 1.8 It should be noted that the landscape (including the context in which views are experienced) is dynamic, i.e. it is affected by social, economic, technological and climatic changes, all of which can influence patterns of land use, land cover and land management. As such, the baseline context for the LVIA is not static.

Description of the Proposed Development

- 1.9 The Proposed Development is described in the Planning Statement but can be summarised in brief as:
- A new building (housing the proposed gas engines and associated infrastructure), with a parapet height of approximately 19.34m;
 - Two exhaust stacks extending from the building to a height of 30m.
- 1.10 In order to gain an appreciation of the relative size and scale of the Proposed Development, it is helpful to have regard to Drawing 2353-01-02 and Figure 1, which show the extent of the proposal in its wider context. It is also perhaps helpful to make comparison to the Recycled Wood Fibre (RCF) development (consented in May 2016, planning application reference: P/2016/0219), which has been built and is now at the commissioning stage. This comprises six silos which are 32m high and located to the north of the site of the Proposed Development. The RCF development has

been added to the photomontages displayed on Figures 2a-l (the baseline photography was taken prior to RCF construction commencing) and is a useful reference feature.

Legislative and Policy Context

- 1.11 Full details of the planning and policy background for the proposal, including an appraisal of effects on relevant landscape-related policies, as set out in the adopted Statutory Development Plan, are included in the Planning Statement. Key legislation and policy documents relevant to the LVIA are summarised below.

Statutory Landscape Designations

- 1.12 The Clwydian Range and Dee Valley Area of Outstanding Natural Beauty is located approximately 300m west of the wider Kronospan site at the closest point. AONBs are a statutory designation, first designated under the auspices of the National Parks and Access to the Countryside Act 1949. The primary purpose of an AONB, as set out in the Countryside and Rights of Way Act 2000, is to “*conserve and enhance the natural beauty*”.

European Landscape Convention

- 1.13 The UK Government is a signatory of the European Landscape Convention (ELC), which became binding in March 2007. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape. It relates chiefly to public bodies and to the policies, plans and programmes produced by these.
- 1.14 The LVIA is a development specific process which accords with Article 6C. The LVIA is informed by extant Landscape Character Assessment studies (described in Section 3 below), which more directly relate to the provisions of Article 6C.

Planning Policy

- 1.15 Full details of relevant planning policies are set out in the Planning Statement. Relevant documents include:
- *Planning Policy Wales*, edition 10 published in December 2018; and
 - *Wrexham Unitary Development Plan* (adopted by Wrexham County Borough Council 2005); and

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- *Local Planning Guidance Note 33. Pontcysyllte Aqueduct & Canal World Heritage Site* (adopted by Wrexham County Borough Council 2012).

2 Methodology

Current Guidance

2.1 This LVIA has been based on the published best practice guidelines set out in the GLVIA, as set out in Section 1 above. The full methodology can be found in Appendix 1.

2.2 The LVIA has also had reference to the following additional guidance documents:

- Landscape Institute (2011) *Photography and photomontage in landscape and visual impact assessment*. Landscape Institute Advice Note 01/11; and
- Landscape Institute (2017). *Visual representation of development proposals. Technical Guidance Note 02/17*.

2.3 Updated photomontage guidance is being prepared by the Landscape Institute (with publication anticipated during 2019), a transitional statement notes that:

“...although the consultation draft contains much substance that will appear in the final guidance, it **should not** be taken as *de facto* guidance from the Institute until the new TGN is issued”.¹ [**emphasis** is from the original]

2.4 As such, the existing guidance has been followed in the preparation/ presentation of photomontages.

The Study Area

2.5 The study area for the LVIA has been determined based upon the assessor’s prior knowledge of the Kronospan site and its surroundings, and previous experience of similar developments. It is considered that, given the industrial context of the Site, there would be little scope for significant effects to extend over a wide area. To

¹ Landscape Institute, 27 Nov 2018. Photography and Photomontage Technical Guidance Note update – interim statement (November 2018) Online
<https://www.landscapeinstitute.org/news/photography-photomontage-interim-statement/?_cldee=YW5keW1hcnRpbjEwMDBAaG90bWFpbC5jb20%3d&recipientid=contact-c1d39681eb4de811a88900224801a4ba-c6f40e1500584f3b89902a170eaadf4d&esid=07e4313b-acf4-e811-a8c0-0022480173bb>

confirm this, the LVIA considers effects up to approximately 2km from the Proposed Development.

Significance of Effect

- 2.6 In the case of development (such as that proposed) that does not require Environmental Impact Assessment, there is no requirement to state whether an effect is significant or not. Nevertheless, it is considered of benefit to the decision-maker for such a statement to be made in the LVIA.
- 2.7 Not all landscape and visual effects arising as a result of a particular proposal will be significant. Furthermore, where likely significant environmental effects are predicted, this does not automatically mean that such effects are unacceptable. The acceptability of landscape and visual effects is a matter to be weighed in the planning balance alongside other factors. What is important is that the likely environmental effects of any proposal are transparently assessed and described in order that the relevant determining authority can bring a balanced and well-informed judgement to bear as part of the decision-making process.
- 2.8 The judgement in relation to this LVIA is that a greater than 'moderate' level of effect is more likely to be significant. This is because such an effect would generally result from larger magnitudes of change on higher sensitivity receptors. This does not preclude a 'moderate' effect or lower being significant, or a greater than 'moderate' effect not being significant. The judgement made will depend on the specific circumstances being considered. Refer to Appendix 1 for further details.

Consultation

- 2.9 The LVIA has been scoped on the basis of previous engagement with Wrexham Borough Council and statutory consultees relating to previous development proposals at the Site.
- 2.10 The fourteen viewpoint locations included in the LVIA have been utilised in assessment of a series of previous applications for development at the wider Kronospan Site. Viewpoints A-L were agreed with Wrexham County Borough Council in relation to the now operational CHP Plant (applications submitted in 2012 and 2014). Viewpoints M and N were identified during 2017 in relation to the applications for the Chip Preparation Building, Chipper and Flaker, Raw Board Storage (all subsequently consented), and OSB Facility (awaiting determination) in

recognition of the fact that within the short section of the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS) from which views of the Kronospan site are visible, the nature of visibility of existing and proposed structures changes in relation to angle of view and the disposition of foreground and middle ground screening features.

Limitations

- 2.11 Viewpoint photography used in the LVIA was taken in November 2016 and reflects the vegetation cover present at this time of year. As such, the assessment of visual effects from each viewpoint has been undertaken on a worst case basis that does not reflect the presence of deciduous foliage during the summer months.
- 2.12 Computer generated Zone of Theoretical Visibility (ZTV) mapping has been prepared to inform the LVIA. The mapping generated is presented in Appendix 5 alongside text which explains the method of preparation and limitations of the techniques and data used.

3 Baseline

Data Collection

- 3.1 Baseline data for the LVIA has been gathered by both desk and field based surveys. These have included review of extant landscape character assessment studies (see below) and field visits to gain an understanding of the landscape and visual context of the Site.

Baseline Conditions

The Site and its Surroundings

- 3.2 The Proposed Development would be located within the existing Kronospan site, which covers an area of approximately 40.2 hectares at the western edge of Chirk.
- 3.3 The Kronospan site includes a number of large industrial process buildings (some with air emissions stacks), storage areas for raw materials, warehouse buildings, offices and car parking. Some of the existing structures are large in scale and height. The tallest structures on site are the CHP emissions stack (70m), the existing WESP stack (65.5m) and the MDF cyclones (57m). Emission plumes from these stacks are often visually prominent from the surrounding area.

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- 3.4 Chirk is a small town located off the A5 and just north of the England-Wales border (within Wales). The residential areas of the town mostly lie east of the B5070, with the Kronospan site to the west of this road.
- 3.5 To the north the Site adjoins agricultural land. To the west, the Site is bordered by a railway line which is paralleled on its western side by the Llangollen Canal. Both the railway and canal run in a north-south orientation. To the south, the Site borders an area of public open space and other industrial uses. Chirk town centre lies south-east of the Site and includes various commercial and community buildings and areas of public open space.
- 3.6 The wider area around the Site is rural. The landform falls steeply, from the hills to the west towards the much lower-lying Shropshire Plain to the east. Local variations in topography are evident, with a marked rise to a ridge east of the town.
- 3.7 To the west of the Site the land rises towards the foothills of the Berwyn Range of mountains. The Llangollen Canal forms part of the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS). Beyond the canal, settlement is sparse and land cover comprises a mixture of pasture and small woodlands. Chirk Castle and its associated grounds (Grade 1 registered) are a notable feature within the landscape. Several public footpaths lead up to the castle. The Offa's Dyke Path National Trail runs in a broadly north-south direction further to the west, with views available east over the lower ground; the path does not always follow the line of Offa's Dyke (a historic boundary earthwork) in this area.
- 3.8 To the north, the land undulates before falling into the steep valley of the River Dee some 2.5km north of the Site. The canal (WHS) runs due north before turning westwards along the southern lip of the valley. The northern side of the valley is urbanised, with a string of contiguous small villages at Cefn.
- 3.9 To the east, the undulating agricultural landscape extends for some 3km before falling sharply into the valley of the River Ceiriog. The A5 corridor runs north-south in what is almost a straight line along a ridge top approximately 1.5km east of the Site. The Brynkinallt estate (registered park and garden) is bisected by the road. The wholly separate Brynkinallt Park lies west of the road, at the eastern edge of Chirk, on reclaimed colliery land.
- 3.10 The steep sided valley of the River Ceiriog cuts through the surrounding hills 1.5km to the south of the Site. Parts of the valley slopes are well wooded. The Llangollen

Canal crosses the valley via the Chirk Aqueduct, which forms part of the WHS. The Ceiriog Trail recreational route runs along the southern lip of the valley. Several small settlements lie to the south of the valley, such as Weston Rhyn and Bronygarth.

Landscape Designations

3.11 As stated in Section 1 above, the Clwydian Range and Dee Valley AONB is located approximately 300m west of the wider Kronospan site at the closest point (refer to Figure 1 for location). The Chirk Castle estate is located within the AONB.

3.12 The special qualities of the AONB are set out in the *Clwydian Range and Dee Valley Management Plan 2014-2019* as follows:

- Tranquillity;
- Remoteness and wildness, space and freedom;
- Heather Moorland and Rolling Ridges;
- Broadleaved woodland and Veteran trees;
- River Valleys and the River Dee;
- Limestone grasslands, cliffs and screes;
- Historic Settlement and Archaeology;
- Industrial Features and the World Heritage Site;
- Historic Defence Features;
- Small historic features;
- Traditional boundaries;
- Iconic Visitor and Cultural Attractions;
- The Offa's Dyke National Trail and Promoted Routes;
- The Built Environment; and
- People and Communities.

3.13 The area west of the Site, beyond the railway, lies within the non-statutory local-level Special Landscape Area (SLA) designation. This designation is protected by a policy in the Unitary Development Plan and is underpinned by *Background Paper 7: Special Landscape Areas* (Wrexham Borough Council 2010), a document prepared to inform the production of the next iteration of local development plans.

3.14 UDP Policy EC5 states that [**emphasis added**]:

"Within 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 from both nearby and distant viewpoints”.

- 3.15 The Proposed Development does not lie within the SLA.
- 3.16 It should be noted that as part of the preparation of the emergent replacement local plan, a new report titled *Special Landscape Areas Study EBN03* (Wrexham Borough Council, January 2017), includes a review and revision of the SLA designation, and proposes the removal of much of the area around Chirk from the SLA. With this in mind, it seems likely that in future, land within the Study Area is unlikely to be subject to SLA designation, once the emergent local plan is adopted.

Landscape Character Assessment and Related Studies

- 3.17 LANDMAP is the formally adopted methodology for landscape assessment in Wales and, as such, forms the baseline for this assessment. The *Wrexham LANDMAP Supplementary Planning Guidance* (adopted 2007) subdivides the Borough into a series of four broad landscape types and twenty-seven geographically distinct landscape character areas (LCA).
- 3.18 The Proposed Development would be located within the Rural/Urban Villages landscape type and within LCA 7a: Chirk. The land to the west of the Site (west of the canal) is located within the Uplands landscape type and within LCA 5a: Chirk Estate to Froncysyllte. Extracts from the SPG, detailing these LCAs are included as Appendix 2. The influence and visual dominance of industrial structures upon LCA 7a is specifically noted in the SPG.

Future Landscape Change

- 3.19 The site of the Proposed Development would be located within the much larger Kronospan site. It seems reasonable to assume that, irrespective of the presence/absence of the Proposed Development, that there would be some degree of change within the wider Site as buildings are replaced to accommodate new industrial processes, or otherwise refurbished, and new items of plant introduced to the Site, reflecting changes in technology or working practices.

Visual Baseline

3.20 As noted in Section 2 above, fourteen viewpoints have been included in the LVIA. The final viewpoint locations were determined on-site, ensuring that localised screening features were avoided.

3.21 Viewpoints fall into three categories, as set out in GLVIA:

- Representative viewpoints (which represent the experience of different types of receptors in the vicinity);
- Specific viewpoints (a particular view, for example a well-known beauty spot);
- Illustrative viewpoints (which illustrate a particular effect/issue, which may include limited/lack of visibility).

3.22 The viewpoints are set out in Table 1 below (refer to Figure 1 for viewpoint locations).

Table 1: Viewpoint Locations

Viewpoint	British National Grid Co-ordinates	Viewpoint Details
A: Chirk Recreation Ground	329045, 337818	<i>Representative</i> of views from public open space in Chirk village centre
B: Offa's Dyke Path near Fron Isaf	327325, 339882	<i>Representative</i> of views from the National Trail, north-west of the site
C: N edge of Chirk	328922, 339170	<i>Representative</i> of views available to residents and road users at the edge of the village
D: Chirk Castle Gates	328114, 337683	<i>Specific</i> view from the Castle gates
E: Green Lane	329697, 338820	<i>Specific</i> view through gap in roadside hedge from hillside lane east of village
F: B5070 north of Chirk	328871, 339664	<i>Representative</i> of the views available from the road leading into the village
G: Offa's Dyke Path west of Bronygarth	325703, 336550	<i>Representative</i> of views from the National Trail, south-west of the site
H: Chirk Castle	327176, 338038	<i>Specific</i> view from the garden terrace at the Castle
I: New Hall	327604, 338884	<i>Representative</i> of views from the adjacent road network and nearby property, and also from the entrance to Chirk Castle
J: Canal towpath near marina	328604, 339627	<i>Representative</i> of views available to canal and towpath users (including those at the marina)
K: Canal towpath north-west of site	328516, 338945	<i>Representative</i> of views available to canal and towpath users

Viewpoint	British National Grid Co-ordinates	Viewpoint Details
L: Chirk Castle driveway	327238, 338583	<i>Representative</i> of views available to visitors on their way to the Castle itself.
M: Canal towpath north of site	328562, 339109	<i>Representative</i> of views available to canal and towpath users
N: Canal towpath north of site	328558, 339165	<i>Representative</i> of views available to canal and towpath users

3.23 It should be noted that the viewpoint itself is not the receptor; rather it is the people that would be experiencing the view from the viewpoint. Receptors in the vicinity of the Site that are likely to experience views of the Proposed Development include:

- Local residents;
- Road and rail users; and
- Tourists/ recreational visitors on surrounding public rights of way/ other routes (including the canal towpath), and as part of their journeys to other destinations.

Cumulative Development

3.24 For the avoidance of any doubt, the LVIA baseline includes the presence of the RCF building at the Kronospan site (construction of which was complete at the time of writing).

3.25 Four other developments at the Kronospan site are either built and being commissioned, under construction or the subject of a valid planning application, and consequently there is potential for the presence of the Proposed Development to result in cumulative landscape and visual effects together with these schemes. As such, a Cumulative Assessment has been undertaken and is set out in Appendix 6. The relevant cumulative schemes are set out in detail in Appendix 6 and listed below:

- Chip Preparation Building;
- Chipper and Flaker;
- Raw Board Storage; and
- OSB Facility.

4 Assessment of Effects

Construction

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- 4.1 The Proposed Development would be located within a large industrial site, where the movement of vehicles, stockpiling of materials and operation of plant are inherent characteristics, and where construction activity relating to other facilities within the wider site is already a familiar influence. Construction activity associated with the Proposed Development would be experienced in the context of the operational Site, and would have little or no influence upon the character of the surrounding landscape or upon views, both of which are already influenced by the extensive and sometimes tall industrial structures present. As such, construction stage effects would not be significant.

Landscape Effects: Operational

Effects on Landscape Fabric

- 4.2 The Proposed Development would comprise a vertical extension to an existing building, and the construction of a new building. The Proposed Development would be sited wholly within the wider Kronospan site where similar structures, buildings and materials stockpiles are already present. As such, the physical fabric of the Application Site would not change materially. Effects would be negligible at worst and not significant.

Effects on Landscape Character

- 4.3 A detailed assessment of effects upon the character of LCA5a: Chirk Estate to Froncysyllte and LCA7a: Chirk is set out in Appendix 3. In both LCAs, the effects of the Proposed Development would be similar.
- 4.4 In summary, whilst the Proposed Development would comprise a relatively large building (with associated stacks) in its own right, this change would take place within an extensive existing industrial site, where many larger structures are already present. Due to its location within the site, relative to existing larger structures, and to the surrounding landform and pattern of vegetation cover, the Proposed Development would not be widely visible. In this context, its presence would be wholly unremarkable, and it would be difficult to discern as a clearly distinct new feature. The overall influence of the Kronospan site upon landscape character is well established and would not change, and the wider underlying characteristics of the two LCAs also would not change. As such, there would be no effect on landscape character.

Visual Effects: Operational

- 4.5 A detailed assessment of visual effects at each of the fourteen viewpoints included in the LVIA is set out in Appendix 4. The viewpoints cover a range of receptor types within the study area, and reflect views towards the Proposed Development from a range of different directions. A ZTV illustrating the theoretical visibility of existing features at the Site and the Proposed Development, and a methodology statement explaining how this was produced, is set out in Appendix 5.
- 4.6 In summary, none of the viewpoints would experience significant visual effects. Seven of the viewpoints would not experience any effects at all, due to views being entirely screened. Of the seven viewpoints (A, B, E, I, L, M, N) that would experience visual effects, in all cases, effects would be negligible.
- 4.7 Generally, the Proposed Development would be well screened by a combination of landform, vegetation cover and existing structures at the Kronospan site, and as such, would not be widely visible. Where visible, the Proposed Development would be viewed in the context of existing and larger structures already present at the Site. The Proposed Development would typically result in only a very minor change to the arrangement of elements within the wider site, and would be difficult to discern as a separate or distinct feature. Many of the existing structures would appear appreciably larger than the Proposed Development in terms of height, mass, floorspace, or all three. As such, the Proposed Development would have little or no appreciable effect upon the long-established existing influence of the Kronospan site upon views. Visibility from the World Heritage Site and from the Chirk Castle estate would be very limited (refer to Viewpoints I, L, M & N) and would not affect the experience of visitors to these features.

Effects on Landscape Designations

- 4.8 It should be noted that the Clwydian Range and Dee Valley AONB was extended in 2011 to cover the area west of the Kronospan site, and that the Kronospan site was present when this extension took place. The presence of large-scale industrial structures at Kronospan did not preclude the inclusion of land a short distance west of the Site within the AONB.
- 4.9 As noted above, neither the landscape effects nor the visual effects of the Proposed Development would be significant. As such, it follows that the presence of the Proposed Development would not have a material effect upon either the statutory

purposes or the special qualities of the AONB. The presence of the Kronospan facility is an established part of the context of the south-eastern edge of the AONB (i.e. the area around Chirk), and the addition of the Proposed Development would not materially increase this influence upon the designation.

Cumulative Effects

- 4.10 The cumulative effects of the Proposed Development, together with other consented and proposed schemes at the Kronospan site are set out in detail in Appendix 6. In summary, the cumulative landscape and visual effects of the proposed new WESP, Chip Dryer, Chipper and Flaker, Raw Board Storage, OSB Facility and Gas Engines developments would not be significant. Whilst each of the schemes would include industrial structures that are substantial in scale, they would all be introduced into the existing Kronospan site, where much larger existing structures exert an established influence upon the surrounding area. Additionally, the landform and level of vegetation cover in the area surrounding the site combine to limit the number of locations where clear views of the schemes would be available. As such the cumulative effects of their presence would be limited.

5 Mitigation

- 5.1 As the landscape and visual effects of the Proposed Development would not be significant, no further specific mitigation measures are proposed.
- 5.2 It should also be noted that, independent of this planning application, the Applicant submitted a landscape strategy for the area surrounding the Kronospan site in May 2017. The purpose of the landscape strategy is to identify and then implement opportunities for enhanced screening of the Kronospan site via new off-site planting and changes to the management of existing vegetation. This submission was made in order to discharge a planning condition attached to the consent of the RCF facility in 2016. The planning condition was accepted as having been discharged by the submitted landscape strategy in October 2018 and implementation of the strategy has commenced.
- 5.3 Implementation of the landscape strategy is likely to result in some reduction in the visibility of the Kronospan site (including the Proposed Development) generally over time.

6 Residual Effects and Conclusions

- 6.1 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. Many 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 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.

FIGURES

APPENDICES