KRONOSPAN RAW BOARD STORE

PLANNING APPEAL BY KRONOSPAN UNDER SECTION 78 OF THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) AGAINST THE REFUSAL OF PLANNING PERMISSION BY WREXHAM COUNTY BOROUGH COUNCIL FOR THE PROPOSED DEVELOPMENT OF A RAW BOARD STORE

LPA REFERENCE: P/2017/0700

STATEMENT OF CASE
APPENDIX A:

LANDSCAPE AND VISUAL EFFECTS EXPERT STATEMENT

JON MASON BSc(Hons) DipLA CMLI

JANUARY 2018

axis

Well House Barns
Bretton
Chester
CH4 0DH

Contents

1.1 Introduction 1
1.2 Qualifications and Relevant Experience 1
1.3 Scope of Statement 3
1.4 Background 4
1.5 Appeal Site and Surroundings – the baseline for assessment 6
1.6 Landscape and Visual Effects 16
1.7 The Reason for Refusal 27
1.8 Analysis of the merits of the Reason for Refusal 29
1.9 Long Term Landscape Strategy (CD02) 32
1.10 Conclusions 33

Figures

Figure A1: ZTV and Viewpoint locations

Figure A2: Supplementary Viewpoints 1 & 2

Figure A3: Supplementary Viewpoints 3 & 4

Figure A4: Supplementary Viewpoints 5 & 6

Figure A5: Supplementary Viewpoints 7 & 8

Figure A6: Photomontage verification

Annexes:

Annex 1: Photographic record of local area

1.1 Introduction

1.1.1 This statement is written in support of a Planning Appeal in respect of the proposed extension of a building to house a new raw board storage facility at the Appellants' factory in Chirk, North Wales.

1.1.2 A planning application was submitted to Wrexham County Borough Council (the Council) in August 2017. Planning permission was refused at planning committee in November 2017 citing the following single reason:

The proposed development, by virtue of its scale, height, massing and siting would have a detrimental impact upon the wider visual amenity of the area. This would have an adverse impact on the character and setting of the World Heritage site and nearby AONB. It would also have a detrimental impact upon Chirk Castle, particularly the setting of the Registered Park and Garden. To allow the development would be contrary to National Planning Policy TAN 24 and 12 and Policy GDP1 of the adopted Unitary Development Plan.

1.1.3 This statement, which forms Appendix A to the main Statement of Case, considers the visual impact of the proposed development in detail and whether unacceptable effects upon amenity are considered likely to result from the Appeal Proposal.

1.2 Qualifications and Relevant Experience

1.2.1 I am Jon Mason of AXIS, a multi-disciplinary planning, environmental and landscape consultancy. The practice operates throughout the UK and has a specialist infrastructure planning capability. I have worked for AXIS since 2001 and hold the position of Technical Director.

1.2.2 I hold a BSc Honours degree and postgraduate Diploma in Landscape Design and am a Chartered Member of the Landscape Institute. I have over twenty years' professional experience in both landscape architecture and landscape and visual assessment.

1.2.3 I have undertaken projects in a wide range of work sectors and for a wide range of clients including local authorities, government bodies and industry. I have been involved in several public inquiries and planning appeals where I have provided evidence on landscape and visual matters as an Expert Witness.

1.2.4 My involvement with the Appeal Site dates from 2012, when I oversaw a team that prepared the landscape and visual impact assessment (LVIA) for a proposed CHP development at the site. AXIS has subsequently prepared planning submissions, including consideration of landscape and visual matters, for a number of proposals at the site.

1.3 Scope of Statement

1.3.1 My statement is divided into a number of sections, as follows:

1) A brief description of the background to the appeal;
2) A description of the Appeal Site and surroundings that form the baseline for landscape and visual assessment;
3) Landscape and Visual Effects of the Appeal proposal;
4) Cultural Heritage Effects;
5) Details of the reason for refusal;
6) Analysis of the reason for refusal;
7) Discussion of the draft long term landscape strategy
8) Conclusions.

1.3.2 The reason for the preparation of this statement is that the Appellant believes that the position reached by officers and subsequently by the Planning Committee as set out in the reason for refusal is incorrect and that the effects of the Proposed Development would in fact be very limited. The supporting documents submitted with the application set out the extent of the effects and are corroborated by the consultation responses provided by Cadw and Natural Resources Wales (NRW).

1.3.3 A detailed landscape and visual impact assessment was submitted with the planning application for the Appeal Proposal and is a primary source of supporting information for this statement. Further supporting information has been prepared in addition to that contained within the LVIA to provide further confirmation of the very limited visibility of the Proposed Development. Annex 1 includes a selection of photographs recording the nature of the environment surrounding the Appeal site along with a viewpoint location plan. In addition, Figures A2 to A5 illustrate eight supplementary viewpoints to the east of the Appeal site.

1.3.4 The statement that I have prepared, and provide for this Appeal, is true, and has been prepared in accordance with the requirements of my professional body. I can confirm that the opinions expressed are my true and professional opinions.

1.4 Background

1.4.1 The Appellant's planning and environmental assessment team has prepared a number of planning submissions for developments within the Kronospan site. As such they are familiar with the characteristics of the site and surrounding area and thoroughly understand the context and baseline environment into which the project that is the subject of this appeal would be introduced.

1.4.2 Whilst the project under consideration is of a reasonably large scale, it sits in the centre of a 40-hectare site. The Appeal proposal can be summarised in brief as a vertical extension to part of an existing factory building at the heart of the established Kronospan site, which would involve raising the height of that part of the building complex by 11.5m to a new roof height of 22.9m. The part of the existing building that would be extended vertically is 123 metres long and 30 metres wide.

1.4.3 In order to gain an appreciation of the relative size and scale of the Proposed Development, it is helpful to have regard to Figure 1 of the Statement of Case which shows the extent of the proposal in its wider context. It can be noted that the proposed development is set back by almost 250 metres from both the east and west site boundaries.

1.4.4 It is considered relevant to consider the Appeal proposals alongside another recently consented project at the Kronospan site.

1.4.5 The Recycled Wood Fibre (RCF) development (consented in May 2016, planning application reference: P/2016/0219), was constructed during Summer 2017. This comprises six silos which are 32m high and located to the north of the site of the Appeal proposal. Images of the RCF development were included in the photomontages which accompanied the LVIA for the Appeal scheme and provide a useful reference feature.

1.4.6 In the Committee Report to the planning committee for the RCF project it was reported that the Canal and Rivers Trust, the AONB committee and CADW all acknowledged the scale and massing of the development but did not raise objections. As can be seen in the visual materials that support the LVIA, the RCF development is a relatively prominent component of the wider industrial complex in views from the areas of designated landscape and heritage assets west of the site.

1.4.7 The Kronospan factory buildings are remarkably well screened from the surrounding area by long established site perimeter planting (much of which was planted by Kronospan for this very purpose approaching 20 years ago) in combination with off site features including topography, other mature vegetation elements, a railway embankment and buildings.

1.4.8 In May 2017 a Landscape Strategy document (CD02) was submitted to the Council in order to discharge a planning condition attached to a previous consented development at the site [Recycled Wood Fibre (RCF) project: planning application reference: P/2016/0219]. The landscape strategy proposes a series of on and off-site planting and landscape management interventions. Most of these are on land in the appellants control with some also on 3rd party land, and thus subject to the agreement of the relevant landowner. The proposals seek to reduce the extent to which the Kronospan site as a whole is visible from the surrounding landscape. At the time of writing Wrexham Council have not formally discharged the condition. Kronospan is in any case intending to commence some of the planting on land under its control during spring 2018.

1.5 Appeal Site and Surroundings – the baseline for assessment

1.5.1 The Kronospan site is located on land adjacent to Holyhead Road (the B5070), Chirk and covers a total area of approximately 40 hectares.

1.5.2 A number of baseline photographic views (14nr. viewpoints in total) are presented in the LVIA (Figures 2a to 2n). Cross reference is made to these images and to other photographic coverage presented in Annex 1 at appropriate points in the text. Views from eight additional, supplementary viewpoints are appended to this Statement (Figures A2 to A5).

1.5.3 The site comprises a large scale manufacturing operation. As such it includes a number of large industrial process buildings, air emissions stacks, storage areas for raw materials, factory buildings for manufacture and storage of products, together with ancillary elements including offices and car parking. Whilst the main site is generally well screened, more open views are possible from a limited number of locations, specifically occupying elevated land to the east [refer LVIA Figure 2e: VP E] and north west [refer LVIA Figure 2b: VP B].

1.5.4 Industrial process facilities are located primarily on the west side of the site, where the raw wood materials used in the manufacture of various grades of board products are processed from imported logs. Processes include de-barking, milling, chipping, sorting and drying. These processes involve a number of tall structures including stacks that emit process emissions to the atmosphere. The tallest structure on the site is the CHP stack at c.70m, closely followed by the SEKA stack at c.65.6m and the MDF cyclones at c.57m. Plumes of primarily water vapour emanating from these stacks are often voluminous and consequently are prominent components in local views. These structures are labelled on the viewpoint Figures. [also refer photographs 1 & 2 in Annex 1]

1.5.5 Manufacture and subsequent storage and despatch of board products currently takes place within a series of relatively low level and horizontally organised buildings, which cover the majority of the developed central part of the site and are typically approximately 11.5m in height. There are occasional items of taller (sometimes roof mounted) plant and equipment located amongst the otherwise simple roofscape of these buildings.

1.5.6 The Appeal Proposal would provide an interim raw board storage facility between the board manufacturing area and the finishing lines. Section 3 of the Statement of

Case describes why the Appeal Proposal needs to be located where it is and why it requires a vertical extension to the building. The location of the Appeal Proposal within the Kronospan site is shown on planning drawing 2196-01-01 and the proposed site layout is shown on planning drawing 2196-01-21-02. Planning drawing 2196-01-03 provides elevations of the Appeal Proposal.

1.5.7 A previous iteration of the Appeal proposal which was submitted to the Council was refused in September 2016. The resubmitted proposals which are the subject of this Appeal were redesigned following the refusal and as a result the height of the proposed building was reduced by 4m and its length reduced by 27m

1.5.8 The western perimeter of the Kronospan site is formed by the Shrewsbury to Chester railway [photographs 1, 2 &11, Annex 1]. Improved railway siding facilities have been constructed within the Kronospan 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 [photographs 3 – 15, Annex 1]. Water is abstracted from the canal for use in the manufacturing process.

1.5.9 The eastern perimeter of the site is formed by Holyhead Road (B5070). An earth bund, planted with trees, was introduced along this edge of the site in the late 1990's to reduce the visibility of the site operations from Holyhead Road and from residential areas opposite.

1.5.10 The site car park, reception building, weighbridge and main site offices are located in the south eastern corner of the site.

1.5.11 To the immediate south of the site are the Mondelez (formerly Cadbury's) chocolate factory, the sports fields of Chirk Amateur Athletics Association (Chirk AAA) and the Chirk recreational ground [LVIA Figure 2a: VP A is a view across the latter, with Chirk AAA located beyond the hedgerow].

1.5.12 The main residential areas of Chirk are located to the east and south of the site with residential properties lining the majority of the eastern side of Holyhead Road. Chirk town centre is located approximately 500m to the south east of the site.

1.5.13 The wider area beyond the urban settlement of Chirk is dominated by agricultural fields and woodland. Chirk Castle and its grounds, a Registered Park and Garden owned by the National Trust are located to the west of the site. A large area of land to the west of the Kronospan site beyond the canal is laid out as a golf course, with fairways divided by mature belts of trees. The golf course is currently disused

and is managed by grazing livestock [photographs 18 – 21, Annex 1]. To the north of the golf course, Chirk Marina is a local focus for leisure narrow boats. A public house and restaurant at the Marina site occupies the former golf clubhouse

Timeline

1.5.14 The Kronospan site has been in operation since 1973. Chirk was historically a mining town, and Kronospan was attracted to the location by the availability of labour, its industrial zoning, development area status and the local availability of timber and wood residues. Since becoming established, the site has grown in size and new development has been brought forward to reflect the technical and operational advances that the company has seen necessary to maintain its commercial position. Notable visually prominent elements of the site of relevance to this statement are the taller elements, including the WESP stack (consented 2004 but replacing earlier, similar structures), the 'MDF cyclones' (consented 1998) and the CHP plant (consented 2012).

1.5.15 More recently in May 2016 planning consent was granted for a Log Yard Recycled Fibre (RCF) project which consists of six large silos (maximum height: 32m) and a number of high level conveyors. Construction of this project was completed in 2017.

1.5.16 Many of the supporting visualisations utilise photography which pre-dates the RCF construction. In order to illustrate its contribution to the baseline, the RCF project was modelled in the relevant views using photomontage techniques [LVIA Figures 2a to 2n]. Figure A6 has been prepared as a supporting document to this statement in order to illustrate the close similarity between the modelled RCF development in those LVIA figures and the completed development as it appears in reality. Figure A6 provides verification of the reliability of the supporting photomontage material more generally.

Existing Landscape / Cultural Heritage Designations

1.5.17 There are a number of statutory and non-statutory landscape designations within the local area.

1.5.18 The site is situated a short distance to the east of a section of the **Pontcysyllte Aqueduct and Canal World Heritage Site** [photographs 3-15, Annex 1] and falls wholly within the buffer area for this designation. World Heritage Sites (WHS) are "places of Outstanding Universal Value to the whole of humanity". The Pontcysyllte

Aqueduct and Canal achieved WHS status in June 2009 because "its value and significance is clearly expressed within the integrity and authenticity of its features and its landscape and cultural setting".

1.5.19 The WHS inscription site forms a linear corridor which extends from the Horseshoe Falls west of Llangollen (Denbighshire) to Gledrid Bridge to the east of Chirk Bank (Shropshire). The World Heritage Site incorporates the Pontcysyllte Aqueduct and associated engineering features, Horseshoe Falls, Chirk Aqueduct, the Llangollen feeder canal, cuttings, embankments and tunnels. The immediate visual setting of the Horseshoe Falls, Pontcysyllte Aqueduct and Chirk Aqueduct are also included. The aqueduct and canal are also designated as a Scheduled Monument

1.5.20 The Kronospan site is located close to the southwestern end of the c.11mile canal corridor. Whilst physically close to the WHS (less than 30m at the closest point), it is at all times separated physically from it by the Chester to Shrewsbury railway line and more importantly is generally very effectively visually separated from it by a combination of topography and mature vegetation. [refer to LVIA Figure 2k: VP K and photographs 3 – 15, Annex 1, which illustrate the screening along the canal corridor more generally]. There is some intermittent intervisibility between the canal corridor and the taller existing built elements at the Kronospan site, but this only occurs for a short section of the canal (less than 1km) [refer to LVIA Figure 2j: VP J and LVIA Figure 2k: VP K]

1.5.21 The eastern boundary of the **Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB)** is located approximately 300m west of the Kronospan site at the closest point. One of five AONBs in Wales, the Clwydian Range which extends north to south in north east Wales was originally designated in 1985. The original 167 square kilometre area was extended in 2011, with a southwards extension of a further 229 square kilometres which includes the Dee Valley, the towns of Llangollen and Corwen, the Pontcysyllte Aqueduct, Chirk Castle and Valle Crucis Abbey. Chirk is located at the south western limit of the designation. [photographs 17 – 28, Annex 1, are taken from along the eastern AONB boundary]

1.5.22 AONBs are designated for the purpose of conserving and enhancing their natural beauty. This includes landform and geology, plants and animals, landscape features and the rich history of human settlement over the centuries. The AONB is

run by a Partnership led by the three county councils of Denbighshire, Flintshire and Wrexham

1.5.23 **Chirk Castle Registered Park and Garden (RPG)** also lies approximately 300m to the west of the site (RPG and AONB boundaries coincide). The RPG is a popular visitor attraction owned and run by the National Trust which includes at its heart the Grade I listed Chirk Castle. The property is also notable for its gardens, with clipped yew hedges, herbaceous borders, woodland walks and rock gardens all surrounded by 18th century parkland. The panoramic view east towards Chirk and the Kronospan site from a terrace and ha-ha at the eastern edge of the garden is a 'listed view' within the RPG citation [refer LVIA Figure 2h: VP H]. Visitors enter and leave the site using two different driveways organised as a one-way system. Some of the clearest views of the existing Kronospan facility from the RPG are experienced from the eastern sections of these driveways [LVIA Figure 2d: VP D illustrates the view from outside the Chirk Castle gates; LVIA Figure 2l: VP L illustrates a view from the driveway within the RPG close to the New Hall entrance]

1.5.24 **Chirk Conservation Area** lies circa 500m to the south of the site. The Listed Buildings and Conservation Areas Act, 1990 defines Conservation Areas as "areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance".

1.5.25 The Chirk Conservation Area was first designated in 1975 and its boundary has subsequently been reviewed and amended in 1997 and 2014. An Assessment and Management Plan adopted in 2014 describes the key features and history of the Conservation Area. In this document it is recognised that a balance needs to be struck between the interests of conservation and the need for change and development.

1.5.26 The Management Plan notes that the village sits within a shallow valley between the historic estates of Chirk Castle to the west, and Brynkinallt to the east – the latter hidden by a sloping ridge and dissected from the village by the modern A5 bypass. The Conservation Area focuses on the historic core of the village which is set on a small outcrop above the River Ceiriog and overlooking the picturesque Ceiriog Valley. The Conservation Area boundary encompasses the original medieval settlement around the Church of St Mary and Church Street and extends westwards along Station Avenue and Castle Road to include the Chirk Aqueduct

and Viaduct [photograph 35, Annex 1], part of the previously discussed World Heritage Site. The Conservation Area boundary also extends northwards to take in part of Holyhead Road which was altered as part of Thomas Telford's historic A5 London to Holyhead trunk road

1.5.27 There is clearly a collective contribution made by the landscape of Chirk Castle Estate and the AONB, the WHS, the Ceiriog Valley and the historic A5 route to the area's cultural heritage and Chirk's strong sense of place. The Conservation Area is noted as forming an important gateway on journeys to and from the protected landscape (most visits to Chirk Castle arrive via the village) and that the heritage value of landscape and built character complement one another.

1.5.28 In terms of Kronospan and industrial development generally, it is observed in the Management Plan (CD08) that (with *my emphasis*): "*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*".

1.5.29 The positive and effective role played by vegetation in mitigating this negative effect is however acknowledged: "*The pattern of mature trees and intact hedgerows within the valley creates a wooded semi-enclosed character which is significant for its integration and screening of much of the industrial area of Kronospan, moderating its effects upon the character of the Conservation Area, the AONB, wider landscape and their appreciation by local residents and visitors*".

1.5.30 Other mentions of the influence of industry include: "*Further expansion northwards continued in the latter half of the 20th Century with the arrival of both the Kronospan and Mondelez factories. Kronospan was established in the town in 1970 on land previously used for agriculture; the original farmhouse, Maes-gwyn remains on the site and now forms part of the industrial complex. The continued investment and growth in both industries has helped support the town, however the huge height and scale of the factories has unfortunately detracted from the wider landscape setting of Chirk and impacts significantly on the approach into the Conservation Area."*

1.5.31 *And: "Also of particular importance and high amenity value are the trees along Trevor Road, Station Avenue, and surrounding the recreational ground, a significant number of which are protected under Tree Preservation Orders. Here*

the well maintained trees add to the peaceful sense of place and quality of the area. The lime trees along the north side of Station Avenue are of high significance enhancing the linear street pattern and channelling views towards the Hand Hotel in the east and the railway bridge and approach to Chirk Castle in the west. Additionally, these trees, along with those surrounding the recreational ground help buffer the negative visual impact of the industrial buildings at the Mondelez and Kronospan factory sites. "

1.5.32 **Offa's Dyke Scheduled Monument** runs north to south along the valley on slopes to the west of Chirk and through the Chirk Castle parkland. A long distance path (the Offa's Dyke national trail) follows a route which shadows the monument but doesn't always directly coincide with it. Chirk and the Kronospan site are intermittently visible from this elevated route, the main determinant of visibility being foreground vegetation. [refer LVIA Figure 2b: VP B which illustrates the view from an open section of the national trail]

1.5.33 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.

1.5.34 UDP Policy EC5 states that:

"*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*".

1.5.35 The Appeal Proposal does not lie within the SLA and as such this policy is not applicable.

Landscape Character

1.5.36 LANDMAP is the formally adopted methodology for landscape assessment in Wales and, as such, formed the baseline for the landscape assessment within the LVIA. 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.

1.5.37 The proposed development site lies within the Rural/Urban Villages landscape type and landscape character area 7a: Chirk.

1.5.38 Landscape character areas in close proximity to the site include:

- 3: Berwyn Foothills;
- 4: Ceiriog Valley;
- 5a: Chirk Estate and above Froncysyllte;
- 7a: Chirk;
- 7b: Cefn Mawr;
- 9d: Froncysyllte to Newbridge;
- 12a: Dee/Ceiriog Wooded Valley; and
- 13a: Welsh Maelor.

1.5.39 *The Shropshire Landscape Typology* (Shropshire County Council 2006) subdivides the County into a series of twenty-seven landscape types. Landscape types in proximity to the proposed development site include:

- High Enclosed Plateau;
- Pasture Hills;
- Principal Settled Farmlands;
- Principal Timbered Farmlands;
- Riverside Meadows; and
- Wooded River Gorge.

Visual Baseline

Existing Visual Context

1.5.40 Whilst effects upon the landscape and upon views are assessed separately in LVIA, there is clearly an interrelationship between these two aspects. As such it follows logically that the visual context for the Appeal Site will be defined by the physical elements that make up the described landscape character.

1.5.41 In the vicinity of this established industrial site there is a mix of urban residential character within the settlement of Chirk and rural leisure uses in the wider 'natural' landscape. The scale of some of the existing industrial components is such that views of industry are frequently available. The rolling topography and the presence of screening elements such as trees, hedgerows and buildings is however such that these views are also often well mitigated or prevented altogether.

1.5.42 In the glossary to the latest (3rd) edition of the Guidelines for Landscape & Visual Assessment (GLVIA) (*Landscape Institute & IEMA, 2013*) (CF04) 'Visual amenity' is defined as follows (p158):

The overall pleasantness of the views people enjoy of their surroundings, which provide an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area.

1.5.43 It is also helpful to note the statement made at paragraph 6.31 (p113) of the GLVIA which states in relation to the Sensitivity of Visual Receptors

It is important to remember at the outset that visual receptors are all people. Each visual receptor, meaning the particular person or group of people likely to be affected at a specific viewpoint, should be assessed in terms of both their susceptibility to change in views and amenity and also the value attached to particular views.

1.5.44 The views experienced around the Appeal Site include (as has been described in the foregoing text) a varied assemblage of elements including backdrops of the AONB hillsides, woodlands and historic parkland and a mixture of urban components within Chirk itself. Evident within this assemblage are views of the industrial sites operated by Kronospan, Mondelez and others (e.g. on the business park west of Chirk station). These sites employ local people and bring visitors to

the village who use local services. As such they are part of the fabric and bring vitality.

1.5.45 The presence of industry manifests itself in:

- views of external elements such as site entrances and signs;
- views of factory buildings and materials storage areas (mostly restricted glimpsed views – albeit with some more open views from more distant, elevated areas);
- views of vehicular traffic including HGVs and trains importing raw materials and exporting products; and
- views of some prominent and quite dramatic tall vessels and structures, some giving rise to large water vapour plumes.

1.5.46 Whilst the industry that can be seen can undoubtedly be categorised as a visual detractor, this juxtaposition of industry with its wider landscape and heritage setting is long established in this location and adds interest - drama, movement and activity. It forms a valid and distinctive component of the established character of Chirk and the local 'sense of place'.

1.5.47 The susceptibility of the people / receptors that experience these views, to proposed changes that are consistent with what is already before them, will be less than it would be to different types of changes. The susceptibility of receptors will also be less than it would be for equivalent receptors occupying a different setting that lacked an existing presence of industrial activity.

1.6 Landscape and Visual Effects

1.6.1 As has already been noted, the appeal proposal was subject to a full LVIA undertaken in accordance with good practice as set out in Guidelines for Landscape and Visual Assessment (GLVIA) (CD04).

1.6.2 Landscape assessment and Visual assessment are separate disciplines, albeit interrelated. As such assessments of landscape effects and visual effects are presented separately. For both topics the underlying assessment process is essentially very similar. The process begins by describing and assessing the sensitivity of the baseline context into which a development will be introduced. The magnitude of change that a development would bring about is then identified relative to the baseline sensitivity. A judgement is then made as to whether the resultant effect will be significant and whether it will be adverse or beneficial.

Assessment findings

Construction stage effects

1.6.3 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 temporary and of short duration. It 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

1.6.4 The Proposed Development would comprise a vertical extension to an existing building, with no other changes proposed. The Proposed Development would be sited wholly within the wider Kronospan site where similar buildings are already present alongside other elements such as tall chimneys and materials stockpiles. 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

1.6.5 A detailed assessment of effects upon the character of LCA5a: Chirk Estate to Froncysyllte and LCA7a: Chirk is set out in Appendix 3 of the LVIA. In both Landscape Character Areas, the effects of the Proposed Development would be similar.

1.6.6 In summary, whilst the Proposed Development would comprise a vertical extension to an existing building (increasing roof height by 11. 5m), this change would take place within an extensive existing industrial site, where other larger structures are already present. In this context, its presence would be unremarkable. The change experienced would be localised and incremental and only capable of being experienced from the limited parts of the landscape from which clearer views towards the Proposed Development are available. The overall influence of the Kronospan site upon landscape character would not change appreciably and the wider underlying characteristics of the two LCAs would not change. Effects upon character would be small at worst and would not be significant.

Visual Effects: Operational

1.6.7 A detailed assessment of visual effects at each of the fourteen viewpoints included in the LVIA was set out in Appendix 4 of the LVIA. 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.

1.6.8 Viewpoints fall into three categories, as set out in the 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).

1.6.9 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	*Representative* of views from public open space in Chirk village centre
B: Offa's Dyke Path near Fron Isaf	327325, 339882	*Representative* of views from the National Trail, north-west of the site
C: N edge of Chirk	328922, 339170	*Representative* of views available to residents and road users at the edge of the village
D: Chirk Castle Gates	328114, 337683	*Specific* view from the Castle gates
E: Green Lane	329697, 338820	*Specific* view through gap in roadside hedge from hillside lane east of village
F: B5070 north of Chirk	328871, 339664	*Representative* of the views available from the road leading into the village
G: Offa's Dyke Path west of Bronygarth	325703, 336550	*Representative* of views from the National Trail, south-west of the site
H: Chirk Castle	327176, 338038	*Specific* view from the garden terrace at the Castle
I: New Hall	327604, 338884	*Representative* 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	*Representative* of views available to canal and towpath users (including those at the marina)
K: Canal towpath north-west of site	328516, 338945	*Representative* of views available to canal and towpath users
L: Chirk Castle driveway	327238, 338583	*Representative* of views available to visitors on their way to the Castle itself.
M: Canal towpath north of site	328562, 339109	*Representative* of views available to canal and towpath users
N: Canal towpath north of site	328558, 339165	*Representative* of views available to canal and towpath users

1.6.10 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.

1.6.11 In summary, the LVIA found that none of the viewpoints would experience significant visual effects. Five of the viewpoints would not experience any effects at all, due to views being entirely screened. Of the nine viewpoints that would experience visual effects, at three of these (B, C and E) a minor to moderate level of effect would occur. Minor effects would occur at four viewpoints (A, I, J and L), and negligible effects would occur at two (G and M). Typically, there would be only localised change and an incremental increase in the established existing visual influence of the Kronospan site upon views. The Proposed Development would be viewed in the context of existing and larger structures already present at the Site. At some viewpoints (B, C and E), the presence of the Proposed Development would increase the perceived spread and or mass of industrial structures within the view, due to the particular juxtaposition of the new structures in relation to the viewpoint.

1.6.12 More generally, the Proposed Development would always be seen in the context of views where the presence of large-scale structures at the Kronospan site is an established influence, and the Proposed Development would typically result in only a minor change to the arrangement of elements within this wider site. Several of the existing structures are much taller than the Proposed Development, and consequently are much more visually prominent.

1.6.13 As such, in conclusion the Proposed Development would make only a very limited and very localised addition to the existing and long-established influence of the Kronospan site upon views from the surrounding area.

Effects on Landscape Designations

1.6.14 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.

1.6.15 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

1.6.16 The cumulative effects of the Proposed Development, together with other proposed schemes at the Kronospan site were set out in detail in Appendix 5 of the LVIA. In summary, the cumulative landscape and visual effects of the proposed new Chip Preparation Building and WESP Dryer, Raw Board Storage and OSB Facility developments were found not to be significant. Whilst each of the four 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.

Mitigation

1.6.17 As the landscape and visual effects of the Proposed Development would not be significant, no specific mitigation measures are proposed.

1.6.18 As previously referenced in this Statement, the Appellant submitted a Landscape Strategy (CD02) to Wrexham Council earlier this year (2017) for the area surrounding the Kronospan site, much of which is in the control of the Applicant. This submission was made in order to discharge a planning condition attached to the consent of the RCF facility in 2016.

1.6.19 The purpose of the landscape strategy is to identify and then implement opportunities for enhanced screening of the Kronospan site in general via both new planting and changes to the management of existing vegetation (e.g. managing certain roadside hedgerows at a slightly higher height). It is intended that implementation of the strategy will commence during 2018.

1.6.20 Implementation of the landscape strategy will result in some reduction in the visibility of the Kronospan site (including the Proposed Development) generally over time.

Residual Effects and Conclusions

1.6.21 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 (more than three times) taller than the Proposed Development. In this context, the additional presence of the Proposed Development would be unremarkable and would result in very little material change to the nature of the existing influence of the Kronospan site upon its surroundings. Neither the landscape effects nor the visual effects of the Proposed Development would be significant.

Supplementary Viewpoints

1.6.22 Following the refusal of planning consent on the grounds in part of effects upon visual amenity, despite the compelling evidence to the contrary, the project team sought to explore whether all angles had been explored in terms of visual effects. We asked the question of ourselves – is there something that we are missing? Due to the concentration of designated assets to the west of the site, we were confident that this area of the landscape had been sufficiently investigated and effects documented by multiple viewpoints and photomontages. To the east of the site, within the settlement of Chirk, there were fewer viewpoints. This was largely due to the calculated assumption that the presence of mature vegetation, in particular the tree screen along Holyhead Road, would mean that the new structure would be difficult to see, despite its increased height.

1.6.23 In order to satisfy ourselves that the Appeal proposal was not more visible than we had assumed, an exercise was undertaken to identify some supplementary viewpoints within Chirk.

1.6.24 This process began with analysis of the Zone of Theoretical Visibility (ZTV) mapping that had previously been undertaken as part of the LVIA (refer to Appendix 5 within the planning application documents). What the ZTVs show is that there are patches of theoretical visibility east of Holyhead Road. An extract of the ZTV is included as Figure A1 to my statement and shows eight Supplementary viewpoints. As can be seen on Figure A1, the viewpoints are all located in public areas that coincide with patches of theoretical visibility (shaded blue) on the ZTV.

1.6.25 It needs to be emphasised that computer generated ZTVs show theoretical rather than actual visibility due to the fact that the 3d model data upon which they are based is imperfect. In this case, the model consists of a Digital Surface Model generated from aerial photography. Accuracy declared for the height data in the model is +/- 50cm and the photography used was taken in 2009. The ZTV thus only provides a good indication of where the new structure will and will not be visible from. The other notable consideration is that the ZTV will show visibility in a binary fashion regardless of the extent of visibility of the proposed structure. As such where only a fraction of the structure might be theoretically visible between other buildings or trees it is displayed in the same fashion as if fully visible and unscreened. For this reason, it is critical to test ZTV findings in the field.

1.6.26 For the selected supplementary viewpoints, the locations were visited and photographs taken using a tripod and making note of the precise location using GPS. The resulting photograph positions were then used to superimpose a model of the proposed structure relative to the photograph in the same manner used when generating a photomontage. An outline of the roofline and side walls of the vertical extension has been traced onto the photographs in red to show its position. Each of the supplementary views, which are illustrated on Figures A2 to A5, is described in turn below:

Supplementary Viewpoint 1:

Junction of Sycamore Drive and Crogen, Lodgevale Park, Chirk

1.6.27 This viewpoint is located on a residential street within the Lodgevale Park area, towards the north-east edge of Chirk. In this view looking along the street towards the south west a segment of well wooded hillside is framed by the roofscape. Within this segment, the tall stacks at Kronospan and associated plumes are clearly visible. The foreground street scene is however the dominant element.

1.6.28 The red dashed line indicates that the Appeal proposal would be located behind both the rooflines of properties on this street but also beyond mature vegetation. A small proportion of the Appeal proposal may be visible in winter in the gaps between trees and between foreground roof elements. Such visibility would be very low key and as such the nature of amenity would not be altered. It is considered that the same statement would be true of other locations in this part of Chirk. Some isolated private locations may experience clearer visibility, for

example from first floor windows but in these cases it is likely that greater visibility of the existing industrial complex is already possible.

Supplementary Viewpoint 2:

Walden Crescent, Chirk

1.6.29 This viewpoint is located on a residential street within Chirk, approximately 250m east of the site boundary and Holyhead Road. This is a more open view than most in the residential area, looking across a relatively large greenspace. The wooded hillside of the AONB beyond the Appeal site is evident above the roofline of the closest houses. Only the uppermost parts of the tall stacks at Kronospan and their associated plumes are visible.

1.6.30 The red dashed line indicates that the Appeal proposal would be located behind both the rooflines of properties and also beyond mature vegetation further to the west. The Appeal proposal is unlikely to be visible at all, even in winter and as such the nature of amenity would not be altered. This is considered to be a 'worst case' public location in this part of Chirk, due to the generous foreground open space which affords a longer distance view (i.e. other viewpoints are generally closer to other buildings and even better screened). Clear views of the Appeal proposal are not expected to be available from private houses due to the presence of intervening screening.

Supplementary Viewpoint 3:

Playing fields north of Chapel Lane / west of Coronation Drive, Chirk

1.6.31 This viewpoint is located within an area of public open space east of Holyhead Road. The elevated hills of the AONB west of the Appeal site can be glimpsed through the dense vegetation screen along the Kronospan site boundary. The rear elevations of properties east of Holyhead Road can be seen in the centre of the view. The tall stacks at Kronospan can be seen rising above the treeline and in different atmospheric conditions, plumes of water vapour would also be prominent.

1.6.32 The red dashed line illustrates that the proposed development would sit well below the treeline and as such would be fully screened from this part of Chirk. As such no change to amenity would result from the Appeal proposals.

Supplementary Viewpoint 4:

Methodist Church, Chapel Lane, Chirk

1.6.33 This viewpoint is located approximately 50m from Holyhead Road, on the footway outside the Methodist Church on Chapel Lane. The view west is dominated for a large proportion of the time by busy traffic on the road, beyond which is the dense tree screen that forms the Kronospan site boundary. The built development of the existing Kronospan site is evident beyond the tree screen but very heavily filtered and not clearly visible.

1.6.34 The red dashed line indicates that the appeal proposal would site squarely behind tall evergreen trees and would not be visible from the viewpoint. From other locations in the vicinity, partial visibility through gaps in the trees may be possible in much the same way as the existing buildings can be seen currently. There would however be no change to the amenity experienced in this part of Chirk.

Supplementary Viewpoint 5:

B5070, Church Street, close to Chirk Service Station

1.6.35 This viewpoint is located on the footway on the east side of Church Street (an extension of Holyhead Road) close to Chirk Service Station, which includes a car sales forecourt (just out of shot on the right hand side on Figure A4). A well maintained hedgerow on the opposite side of the road provides a dense screen, preventing views into the Chirk AAA sports facilities beyond. Cricket nets and some floodlights within the sports facility can be seen on the left side of the view and the clubhouse roof is visible to the right. The taller elements of the Kronospan facility are clearly visible beyond, back dropped by a partly wooded hillside. Further north, tree cover encloses the lower level factory buildings on the Kronospan site, which are completely screened

1.6.36 The red dashed line indicates that the Appeal proposal will sit behind the established tree screen. Based on the current maturity of the vegetation, it can be seen that a small part of the right hand end of the proposed vertical extension would be partially visible. This visibility would diminish during the summer with the addition of foliage and over time as trees gain height. The visible elements of the proposal would be very low key in this context and no material change to amenity would result.

Supplementary Viewpoint 6:

Station Avenue, Chirk

1.6.37 This is a view across the Chirk Recreation Ground from the footway on the north side of Station Avenue. A mature tree belt terminates the public open space on its west side and in combination with vegetation on the boundary with the Chirk AAA site and further back on the Kronospan site boundary forms a relatively dense backdrop to the amenity grassland and veteran oak trees in the foreground. The hills of the AONB are intermittently visible between gaps in this vegetation. The taller elements of the Kronospan site are unmistakeable beyond the trees on the left side of the view but otherwise the majority of the appellant's operations cannot be seen, including the extensive factory buildings which are only around 500m from the viewpoint

1.6.38 The red dashed line shows that the Appeal proposal would be largely screened by the intervening mature tree cover at the centre of the view. The uppermost roofline would be partially visible based on the current maturity of the vegetation. The visible structure would be a very low key and unremarkable addition to a view that has a number of eye-catching foci and consequently there would be no change to amenity. I would expect any visibility to only last a small number of years and be fully screened by vegetation thereafter.

Supplementary Viewpoint 7:

St Marys Court, Chirk

1.6.39 This viewpoint is located almost due east of the war memorial in the centre of Chirk. Whilst the ZTV indicated a large splash of theoretical visibility in front of this development of social housing, it is apparent that a new health centre development must have post-dated the 2009 aerial photograph upon which DSM data used for the ZTV. Consequently, the red dashed line indicates that the Appeal proposal would be located behind the new building and not visible.

Supplementary Viewpoint 8:

Trevor Road, Chirk

1.6.40 This viewpoint sits within an area of theoretical visibility that extends across the graveyard behind St Marys Church. From this location the backdrop of the AONB

hillside is clearly visible beyond the town. The tall stacks and in particular the plumes of the Kronospan facility are also clearly visible. In the foreground, railings and a hedgerow screen and filter views of the churchyard and townscape beyond. The townscape consists of varied roofs, interspersed with garden trees.

1.6.41 The red dashed line indicates that the Appeal proposals sit behind and at a lower level than the roofscape of the intervening buildings (beyond the hedge) and that consequently they will not be visible. It is possible that fragmentary views of parts of the structure are possible from other points in the locality, but any such degree of visibility would not result in anything approaching a material alteration to amenity.

1.7 The Reason for Refusal

1.7.1 The Proposed Development was considered by the Wrexham Planning Committee on the 6th November 2017.

1.7.2 The Application was refused for the following reason:

The proposed development, by virtue of its scale, height, massing and siting would have a detrimental impact upon the wider visual amenity of the area. This would have an adverse impact on the character and setting of the World Heritage site and nearby AONB. It would also have a detrimental impact upon Chirk Castle, particularly the setting of the Registered Park and Garden. To allow the development would be contrary to National Planning Policy TAN 24 and 12 and Policy GDP1 of the adopted Unitary Development Plan.

1.7.3 It is noted that the officers report to committee recommended refusal but that advice from some key consultees was not aligned behind the officer. Importantly, these were core stakeholders in respect of the heritage and landscape matters that are central to the reason for refusal. Table 2 below provides a summary of the consultation responses from bodies with a heritage and/or landscape remit.

Table 2

Consultee	Summary response
CADW	No objections. Agree with the Appellants assessments in terms of visual effects and heritage
NRW	Agreed with LVIA finding of no significant effects on AONB views or established character of the site
Canal and Rivers Trust	No objection
AONB board	Serious concerns that the scheme will have a harmful impact on the AONB and key heritage assets
WHS advisory group	Expressed concern about scale of development and its consequent visual impact

1.7.4 Detailed consideration of the referenced planning policies is provided in the Statement of Case which this document supports. However, the judgements made in respect of effects on landscape, visual and heritage receptors are examined in the following section.

1.8 Analysis of the merits of the Reason for Refusal

1.8.1 The reason for refusal incorporates a number of assertions that are usefully separated out in order to address them on their own merits:

A. The proposed development would have a detrimental impact upon the wider amenity of the area

B. The proposed development would have an adverse impact on the character and setting of the World Heritage site and the AONB

C. The proposed development would have a detrimental impact on Chirk Castle, particularly the setting of the Registered Park and Garden

D. The development would be contrary to National Planning Policy TAN 24 and TAN 12

E. The development would be contrary to policy GDP1 of the Unitary Development Plan

1.8.2 As stated above, planning policy is dealt with in the Statement of Case and as such items D and E are not addressed here. Taking each of items A to C in turn:

A: The proposed development would have a detrimental impact upon the wider amenity of the area

1.8.3 As has been set out earlier in this statement (paragraphs 1.5.40 to 1.5.47), visual amenity must be considered in the context of the amenity currently experienced and the value attached to the views available by the people (receptors) that live and work in or visit the area

1.8.4 The Proposed Development would introduce a new large infrastructure element – consisting of an elevated extension to part of the existing factory 123m long and 30m wide. It would rise above the existing factory roof scape by approximately 11m but it would be otherwise consistent with the existing development in terms of cladding colour and finish. Despite this increase in height, by virtue of the arrangement of existing screening elements, the extent to which the proposals would be clearly visible is very limited, particularly from the residential areas of Chirk to the east, from which the combination of built form within the residential area, existing tree cover on and around the Kronospan site and distance are such that the structure would be well hidden.

1.8.5 In order to verify this in advance of preparing this appeal statement a number of supplementary viewpoints to the east of the site were identified and visited in November 2017. Specific locations were identified by reference to a Zone of Theoretical Visibility (Figure A1) and as such the supplementary viewpoints are positioned in the areas which are theoretically most likely to experience views.

1.8.6 Having taken these photographs, a computer based exercise was undertaken to model the visibility of the building. The visibility of the building was established using the same construction utilised for photomontage. Given the consistent lack of direct visibility, instead of preparing a photomontage, the outline of the proposed structure was instead overlaid onto each viewpoint photograph as a red dashed line. The composition of each of the views in turn was described in section 1.6 (paragraphs 1.6.27 to 1.6.41)

1.8.7 This exercise established that the nature of change in terms of visual amenity from within Chirk would be very modest at worst, with no change apparent in many cases.

1.8.8 There would be localised change in the composition of the view from some vantage points to the north and west. In all cases, the appeal proposal would be seen in the context of an already visible roofscape with plant and equipment rising above it. The appeal proposal would alter the specific composition but not the established nature of the views. The receptors concerned currently experience partial or full views of a large industrial site and as such they are not especially susceptible to the addition of this type of visual element. <u>There would be only limited change to visual amenity and consequently the proposed development would not have a detrimental impact upon the wider amenity of the area.</u>

B: The proposed development would have an adverse impact on the character and setting of the World Heritage site and the AONB

1.8.9 In respect of the AONB, there are certainly some locations within this south western tip of the AONB from which the appeal proposal would be visible. However, in all cases the proposals would be seen as part of a long established industrial site. At all of the viewpoints assessed within the AONB effects would be negligible at worst. The proposals would not materially extend the envelope of visibility or introduce any material change to the nature of views and as such my judgement would be that no new adverse impacts upon the AONB would result.

1.8.10 Consideration of the settings of heritage assets is beyond my sphere of expertise and as such I rely on the expertise of Dr Stephen Carter in respect of effects upon the World Heritage Site, documented in his expert statement (refer to Appendix B of the Statement of Case). Dr Carter concludes that the construction and operation of the proposed development would have no impact on the heritage significance or Outstanding Universal Value of the Pontcysyllte Aqueduct and Canal.

C: The proposed development would have a detrimental impact on Chirk Castle, particularly the setting of the Registered Park and Garden

1.8.11 Again, consideration of the settings of heritage assets is beyond my sphere of expertise and as such I rely on the expertise of Dr Carter in respect of effects upon the World Heritage Site. Stephen concludes that the construction and operation of the proposed development would have no impact on the heritage significance of Chirk Castle Historic Park and Garden (refer to Appendix B).

1.9 Long Term Landscape Strategy (CD02)

1.9.1 A Long Term Landscape Strategy has been prepared for the Kronospan site. The document has been prepared in order to comply with planning conditions applied to recent consents and seeks to identify practical measures that can be implemented in and around the site to further mitigate the visual effects of the facility on its surroundings. Given the modest visual effects that will result from the Appeal Proposal, specific mitigation of its effects is not considered to be required or necessary to make the development acceptable in landscape and visual terms.

1.9.2 Nonetheless, the proposed strategy which will be implemented by Kronospan will provide increased screening of the site generally, including the Appeal Proposal. Specifically, it can be noted that two of the planting proposals identified in the draft strategy (*Off-site Planting Area G & H – Figures 7(vii) and Figure 7(viii)*) would supplement existing screening vegetation to the south east of the Appeal site. Mitigation in this instance would consist of specimen tree planting in the foreground of views from Chirk and the Recreation Ground – these schemes would be dependent upon the cooperation of Chirk AAA Sports club and Wrexham Council respectively.

1.10 Conclusions

1.10.1 This statement has been prepared by Jon Mason CMLI, an experienced chartered Landscape Architect.

1.10.2 In the statement I have set out the background to the Appeal from a landscape and visual perspective, describing the nature of the existing site and the wider receiving environment into which the Appeal proposal would be introduced. Previous planning consents are considered to be material to the appeal and have been described.

1.10.3 The statement provides information about landscape and visual impacts over and above that which was provided in the LVIA which supported the original planning application in order to ensure that the nature of effects is fully described for the appeal. Specifically, I have sought additional locations from which theoretical visibility is identified by a computer generated ZTV in order to illustrate the actual nature of visibility from those locations. This exercise reinforced the finding of the LVIA that there would not be significant visual effects. My statement thus fulfils two objectives, firstly demonstrating that there would not be any significant impacts and secondly providing the visual evidence to support this.

1.10.4 I conclude that the Appeal proposal would not result in adverse effects upon the visual amenity of the area and that as such the Reason for Refusal is without merit.

1.10.5 Finally, in respect of policy considerations, these are addressed in the Statement of Case to which this document is an Appendix. None of the policies cited in the Reason for Refusal is found to have been breached by the Proposed Development.