

**SITE AT HOME FARM
Gresford Road, Llay. Wrexham LL12 0NW**

**Town and Country Planning Act 1990
Appeal by Mrs Margaret Crewe**

PLANNING APPEAL 22th - 25th November 2016

**PINS Ref: APP/H6955/A/16/3147116
LPA Ref: P/2014/0905**

**PROOF OF EVIDENCE :
LANDSCAPE AND VISUAL IMPACTS**

**Tom Hollick BA(Hons) DipLD CMLI
On Behalf of Mrs M Crewe**

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1. PERSONAL INTRODUCTION

- 1.1 My name is Tom Hollick. I am a Chartered Landscape Architect, Consultant to BCA Landscape, appointed by the Appellant to address the landscape and visual impact issues arising from the Appeal.
- 1.2 I was awarded a BA Honours Degree in Geography at the University of Hull in 1973, and a Diploma in Landscape Design by the University of Manchester (1975). Since passing the professional examinations in 1977 I have been a fully qualified member of The Landscape Institute (LI) with the current designation as a Chartered Member of The Landscape Institute (CMLI). I thus have over 40 years experience in my profession, spent in a New Town Development Corporation, Local Authority, and (from 1984) as a Partner of BCA Landscape, Chartered Landscape Architects (Liverpool) and registered with The Landscape Institute. Having managed the Practice for 32 years I ceased to be a Partner in April 2016, but have retained a full time role as Consultant.
- 1.3 Much of my experience involves the assessment of potential development sites within the given context, and the design of appropriate treatments to integrate them with their surroundings; this covers both rural and urban settings.
- 1.4 I was the Project Landscape Architect for BCA Landscape's commission to develop the Drift Park project in Rhyl, the quality of which has been recognised by the Welsh Assembly Government, being included in the Planning Policy Wales Technical Advice Note (TAN) 12 *"Design"* with the caption *"Urban regeneration through partnership creating a new interest to an area"* (page 37). Whilst the location here is urban it demonstrates the care my Practice takes to ensure our projects respect their context.
- 1.5 In the local area I have recently worked with the Gresford Community Council on a feasibility study for the improvement of the village centre.

2. SCOPE OF EVIDENCE

- 2.1 I have been asked to address the landscape issues of the Application and the Appeal. In the opening section (3 in sequence) I will summarise my appraisal of the site and its features, to establish a baseline for the review of the development proposal.
- 2.2 Section 4 will summarise the potential landscape and visual effects arising from the proposed development, and set this within the context of the Home Farm site.
- 2.3 Section 5 will summarise the landscape strategy which I personally developed in consultation with the Project Architect, and which was submitted as part of the Planning Application.
- 2.4 Section 6 will summarise the response to the formal Planning Application P/2014/0905 noting the principal issues arising from the representations, and concluding with the reason given for the refusal and the key issues arising.
- 2.5 Section 7 will summarise the effect on landscape character and respond to the key questions as to the impact on the local countryside ; it will also consider whether the development is a logical expansion of Llay.
- 2.6 Section 8 will consider the visual effect of the proposed development.
- 2.7 Section 9 will respond to the planning policy context as identified by WCBC in the Decision Notice and the Statement of Case, as these apply to landscape and visual matters.
- 2.8 My Evidence will end with Section 8 and my conclusion.

- 2.9 Throughout this structure I will refer to the proposed landscape / planting strategy submitted as part of the Application : I believe this has pre-empted the issues raised in the consultation process and has already addressed the concerns.
- 2.10 My Evidence will refer to the Core Documents noted in the Planning Statement of Common Ground (PSoCG, Ref CD65). I will also refer to the Appendix of Plans numbered 1 - 9 in Appendix C included with the Landscape Appraisal submitted with the Planning Application P/2014/0905 August 2015 (the LVIA, Ref CD10), this being the one considered by the Planning Authority in their decision. It contains a Landscape Strategy proposal (Plan 08 Ver2) which presented an alternative arrangement of site access to that contained on an earlier version also discussed with Council Officers (Plan 08) and contained in the Core Document Ref CD9, The Planning Statement of Common Ground (PSoCG Ref CD65) clarifies this matter in paragraph 2.6 on page 4.
- 2.11 Additional references to documents are prefixed 'TH' and included in Appendix One of my Evidence, I have also here included an Appendix Two, containing additional plans prepared to further explain features of the proposal and to support opinions expressed in my Evidence : to avoid confusion these are numbered from 10 onwards, to maintain the sequence from the original submission.
- 2.12 My submission is supported by my colleagues Stephenie Hawkins of GVA (who will address planning aspects) and by Alex Vogt of Curtins Consulting Engineers addressing highways. Cross references to their submissions are made where appropriate.
- 2.13 In accordance with this structure I will begin with a summary of the existing Home Farm site, and identify its principal features.

3 DESCRIPTION OF THE HOME FARM SITE

- 3.1 The description of the existing landscape context of the site, and the site itself, is contained in the Report "*Landscape and Visual Appraisal including Tree Survey (November 2014)*" (The LVIA, Ref CD9) prepared by myself and submitted with the Application P/2014/0905. This was subsequently updated in August 2015 (to accommodate an alternative option for site access and submitted to WCBC (as acknowledged in the PSoCG at 2.4 and 2.6). The August 2015 edition (LVIA August 2015 Ref CD10) is the one referred to in my Evidence: the Plans contained in this as Appendix C are also referred to in my Evidence below.
- 3.2 The methodology for the appraisal followed the procedures noted in the standard document "*Guidelines for Landscape and Visual Impact Assessment*" (Third Edition) (the GVLIA) published jointly by the Landscape Institute and the Institute of Environmental Management and Assessment (2013).
- 3.3 Section 2 of the LVIA (Ref CD10) described the principal features of the site context, with reference to the Plan 02 contained in its Appendix C. I have re-visited the site in August 2016 and find there are no significant changes in its condition which would require my original appraisal to be altered.
- i) The surrounding land to the north and east is predominantly pasture, divided by hedgerows and occasional blocks of woodland. Land to the south is more wooded, towards the valley of the River Alyn. Land to the west is residential, being the housing on the west side of Gresford Road, part of Llay village.
 - ii) The original core of Llay village is west of Nant-y-Gaer wood (marked 2 on Plan 02).
 - iii) Gresford Road (4) is the B5373 and provides the primary access to the west side of Llay. It forms a junction (signal controlled) with the B5102 route eastwards (5) to Rossett and Chester (known as the Straight Mile) at the north west corner of the Site ; this is known as the Crown junction (6) on account of the public house on the corner. The B5102 continues westwards, with a link to Wrexham via Llay New Road (B5425)

(7) on the west side of Llay. Other routes springing from the Crown junction are Chapel Lane (8) a minor road heading into the countryside to the north east, with the continuation of the B5373 northwards towards Ruthin being known as Rackery Lane (9) providing access to the Llay Industrial Estate.

- iv) Plan 02 (Ref CD10 Appendix C) notes the distribution of housing in the area, being primarily the residential area west of Gresford Road (3). There are scattered dwellings on the east side, being Home Farm itself (1) and Old Meadow Court (17), being the conversion of farm outbuildings to provide residential accommodation. There is are two detached houses on the south boundary (Y Bwthyn 13 and Maes y Rhedyn 14) : to the north there are three houses on Chapel Lane (8).

- 3.4 The landscape structure is identified in Plan 03 of the LVIA (CD10 Appendix C). Nant-y-Gaer and Cockpit Woods are located in the valley sides to the south and west, but in the vicinity of the Site the following significant woodlands, trees and hedgerows help to define the visual envelope of the Site –

W1 – is the woodland copse established at The Crown junction : it provides partial screening for the larger scale buildings and activity of the Llay Industrial Estate to the north and west.

W2 – are the hedgerows and hedgerow trees at the west end of Chapel Lane, around the houses No's 2 – 4 and 'The Poplars', and include the line of individual oaks in the field between Chapel Lane and the Straight Mile (remnant of a former hedgerow). The group also extends north westwards along the Rackery Lane corridor.

W3 – continuous hedgerow between the Straight Mile and Chapel Lane immediately north and east of the Site, including a small copse of mature trees close to the road. W3 provides a screen to view towards the Site from the north east.

W4 – a belt of (predominantly) scots pine and oak established on the Site boundary along Gresford Road, between Home Farm and The Crown junction.

W5 – a block of woodland around the houses Maes y Rhedyn and Y Bwthyn : the woodland screens potential views of the Site from the south east, especially to traffic approaching northwards along Gresford Road.

W6 – hedgerows in the fields east of the Site contain more trees than those within and immediately surrounding the Site. W6 is the more westerly of these ; it contains a high proportion of tree species (predominantly oak) and provides a screen to views of the Site from Gegin Lane and the houses at Mount Pleasant.

W7 – the hedgerow trees become denser between the southern boundary and Gegin Lane, providing effective screening.

- 3.5 None of the trees either within the site or the context are protected by Tree Preservation Orders (TPO). There are no other designations which might afford protection, a matter agreed between the parties (Ref PSoCG CD65 at 3.2)
- 3.6 Trees within the application site were surveyed to the recognised standard of BS5837:2012, with the findings presented in Appendix B (CD10). The trees are generally in good condition and worthy of retention in the development proposal.
- 3.7 The pasture also features dividing hedgerows which are maintained as stock-proof enclosures. Whilst they contain tree species they are cut regularly to maintain height at 1.5 – 2.0m approximately : these internal hedgerows are also marked on the plan 3.
- 3.8 A key finding of the appraisal is that the area from which the site is visible is limited. The LVIA paragraph 4.25 and plan 04 (Ref CD10, Appendix C) notes the zone of visibility of the existing site, in which the following features are significant - the limitation of the views on the north, east, and south quarters by the structure of hedgerows, trees, and woodland ; and, to the

west, as a result of the ribbon development of housing along Gresford Road. The extent of visibility is a matter of agreement between the parties as per the Planning Statement of Common Ground (PSoCG (Ref CD65) Appendix 4).

- 3.9 The main features of the existing site are noted in Section Four of the LVIA (Ref CD10), summarised as -
- i) The site is maintained as farmland with no public access (LVIA section 4.3-4.4).
 - ii) The site boundary is defined by hedgerows, with occasional insertions of Cheshire fencing (a distinctive roll topped metal railing) and stone walling (LVIA section 4.5 - 4.11).
 - iii) The Gresford Road boundary includes mature trees (LVIA section 4.15), most of which are to be found close to the Crown junction : a full tree survey in accordance with the standard of the British Standard (BS) 5837:2012 was submitted as part of the Application (Appendix B to the LVIA, Ref CD10). Tree species are to be found in the site hedgerows, these are maintained by regular cutting as part of the management of the pasture.
 - iv) The internal area of the site is then divided into individual fields by hedgerows - these are managed to provide a functional enclosure of the individual fields (LVIA section 4.14)
 - v) The landform is gently undulating (LVIA section 4.12 - 4.13).
 - vi) There are no permanent ponds within the site (LVIA section 4.17).
- 3.10 This structure provides some natural control over views of the site, particularly the perimeter hedgerows on the Gresford Road and the Straight Mile edges, reinforced in the former by the group of trees near to the Crown junction and by other more intermittent trees in the roadside hedgerow south of Home Farm.
- 3.11 In terms of landscape character, the LVIA (Ref CD10) at 4.22 summarises the attributes of the site against the criteria set out in WCBC's own landscape character assessment, this being the Wrexham Landmap Supplementary Planning Guidance (The Landmap SPG). The Landmap SPG is one of a series of guidance notes supporting the policies of the Unitary Development Plan. The Home Farm site falls within Landscape Character Area 8 (LCA8) "Gwersyllt, Llay, Gresford, Borrass": LCA8 is divided into three parts by the valley landform of the Alyn river and Nant-y-Gaer wood (designated as Character Area 9B in the Landmap). With this exception Character Area 8 includes much of the land to the north and east of Wrexham, taking in several edge of town villages such as Gresford, Marford and Gwersyllt.
- 3.12 I have included this as well as the initial introduction 'Summary Sheet' section in Appendix One of my Evidence as Document TH01. With reference to the specific section on Area 8 the following characteristics are particularly applicable -
- i) Bullet point 1 - The site is "*generally undulating open arable farmland affected by proximity to urban areas*"
 - ii) Bullet point 4 - the site context includes areas of woodland, these being Nant-y-Gaers and the localised structure noted in the LVIA at 2.15 and identified on plan 03 of the associated Appendix C (CD10, Plans & Illustrations)
 - iii) Bullet point 6 (final) - notes that villages within Area 8 - "*...are semi-rural with extensive suburban development*". The LVIA notes the expansion of the original core of Llay village to the west edge of Gresford Road through modern development of estate roads and semi-detached / detached housing. The former outbuildings of Home Farm have also been converted into residential accommodation.

- 3.13 The LVIA (Ref CD10) includes two pages of photographs (05 and 06) of typical views of the site, illustrating the landscape character. Key features evident are the enclosing woodland, that in the upper view on Plan 05 (trees within the site) screening the housing on Gresford Road, with those in the lower View 2 enclosing the site to the south (trees outside the site boundary). Views on Plan 06 are across the centre of the site, showing the effect of the encircling woodland to the east and the hedgerows dividing the pasture within the site.

4 POTENTIAL LANDSCAPE AND VISUAL EFFECTS

- 4.1 The PSoCG (Ref CD65) at 5.2 accepts that there will be visual impact arising from the development, but I believe this can be mitigated by careful design and attention to detail to address the potential effects. The LVIA (Ref CD10) identified the likely source of these effects, and provided a significance category based on the GVLIA methodology and summarised on the final page of its Appendix A.
- 4.2 In terms of land use and vegetation, the baseline assessment has confirmed that the site is currently maintained as farmland, primarily as pasture for grazing livestock. The site does not have any internal features that would prohibit its use for residential development. The significant vegetation in the form of mature trees is on the perimeter, along with mature hedgerows and both can be retained.
- 4.3 The transformation of the fields from pasture to residential development will clearly alter the site. However, the prevailing character of pasture, divided by hedgerows and linear woodlands is common within the area : with reference to the WCBC LCA8 assessment (3.10 above) I have prepared Plan 10 in Appendix Two, which identifies the Home Farm site within the Landmap designation extract included in Appendix One (TH01) - the northern third of the designation is approximately 900ha in extent.
- 4.4 Beyond this arc of trees the "*undulating open arable farmland*" of LCA8 continues into the LCA13C (Dee Terraces) noted as "*Low-lying, flat, intensively farmed landscape*" and then LCA 14 (Dee Floodplain) noted as "*Open flat farmland with pasture and arable use*". These characters extend across the Borough boundary into the neighbouring authority of Cheshire West as far as the Chester bypass, noted as Broughton (4.3 miles / 6.9km due north of the Crown junction), and to Saltney (5.9 miles / 9.5km to the north east of the Crown junction on the Plan 16. The landscape character of the Home Farm site is common within the area
- 4.5 The sensitivity and value of a landscape is influenced by its inherent complexity, scale and character. Appendix A of the LVIA (Ref CD10) sets out eight criteria against which 'sensitivity' can be considered (these are drawn from Box 5.1 in the GVLIA). I will now consider each of these in turn relative to my assessment of Home Farm site -
- i) Landscape quality - as noted above the site character is common within the landscape context. The landscape elements are simple, being mainly pasture with dividing hedgerows, perimeter hedgerows and 29 mature trees : all these are in good condition, and would not require any remedial action to improve their appearance or health.
 - ii) Scenic quality - the Home Farm landscape is unremarkable in that it has no prominent features to draw the eye. The scenic quality is established by the perimeter hedgerows and trees, and these generally screen the landscape within the site.
 - iii) Rarity - the PSoCG (Ref CD65) at 5.2 notes the site it has no landscape designations which, if applied, would denote a degree of rarity. Again as noted, the pastoral landscape is common within the context and within the region.
 - iv) Representativeness - as above, the site has no designations and its character is commonly to be seen within the landscape context.

- v) Conservation interests - the PSoCG (Ref CD65) notes (at 3.2) that the site is not subject to any designations relating to Green Barrier, Special Landscape Area, Biodiversity Conservation, or Conservation Area. In terms of the site ecology, at 5.12 the PSoCG notes that the proposed development is not contrary to UDP policies relating to nature conservation, wildlife interest, and biodiversity conservation.
- vi) Recreational value - the site has none, being a working farm with no public right of access.
- vii) Perceptual aspects - as noted the Home Farm landscape is common within the area, and thus unremarkable. Tranquility is noted in the criterion, and I consider this in more detail at 4.6 below
- viii) Association - as far as I am aware Home Farm has no associations with particular people (artists, writers) or events in history which would enhance the value of the site there are no such features which would add to the value of the landscape nor which have value in their own right.

4.6 I note the Council for the Protection of Rural England (CPRE) has considered the issue of "Tranquillity" in a mapping exercise for the whole country. The full title of the study is *"Tranquillity Mapping: Developing a Robust Methodology for Planning Support Technical Report on Research in England, January 2008 (revised)"* and can be accessed on the CPRE website (<http://www.cpre.org.uk>) : the exercise was published in 2008, and there has been no subsequent review.

4.7 The Study summarises a top ten criteria for the assessment of 'tranquillity', noting first that it is represented by –

1. *Seeing a natural landscape*
2. *Hearing birdsong*
3. *Hearing peace and quiet*
4. *Seeing natural looking woodland*
5. *Seeing the stars at night*
6. *Seeing streams*
7. *Seeing the sea*
8. *Hearing natural sounds*
9. *Hearing wildlife*
10. *Hearing running water*

For the opposite view and to assist the definition the CPRE has also set out ten criteria for what tranquillity is not –

1. *Hearing constant noise from cars, lorries and/or motorbikes*
2. *Seeing lots of people*
3. *Seeing urban development*
4. *Seeing overhead light pollution*
5. *Hearing lots of people*
6. *Seeing low flying aircraft*
7. *Hearing low flying aircraft*
8. *Seeing power lines*
9. *Seeing towns and cities*
10. *Seeing roads*

Being the CPRE the tranquillity map the report produces does not cover areas in Wales. However, in terms of applying the criteria to Home Farm I would conclude that it is not a notably tranquil : it is not a natural landscape (first list, item 1 - being managed for agriculture) and there is noise from traffic on Gresford Road and the Straight Mile (list 2, item 1). Urban development lies adjacent (list 2, item 3) ; there is overhead light pollution (list 2, item 4) : low flying aircraft are occasionally seen (list 2, items 6 and 7), as are roads (list 2, item 10). In

respect of the overhead power line criterion, whilst there are none there is the telephone mast visible adjacent to the south boundary.

- 4.8 On the basis of this assessment I consider the sensitivity of the site is low, with development considered to be a **low magnitude** of change when seen against the prevailing rural character, leading to an **adverse** effect of **minor significance**.
- 4.9 The site layout illustrated by the Plans 08-09 LVIA Ref CD10 Appendix C) is provisional, and is used here to assess the likely effect of development on the Site. The worst-case scenario is that all internal hedgerows (560m) are lost. The hedgerows are regularly maintained as stockproof barriers and are not covered by statutory or non-statutory designation : the type is both common and widespread throughout the local landscape context and is replaceable. The loss is likely to result in a **medium magnitude** of change to the vegetation resource leading to an **adverse** effect of **moderate significance** in the short term. However, as noted, this is worst case and the intention, at detailed design stage, is to retain internal hedgerows as far as feasible.
- 4.10 In terms of landform - the baseline assessment has identified the gently undulating nature of the landform : the site layout shown is provisional but responds to the landform and can be accommodated without any engineering intervention (such as terracing, cut and fill). Any development will also appear consistent with the existing settlement of Llay south of Gresford Road, and is likely to result in a **low / negligible magnitude** of change to the landform leading to an **adverse** effect of **minor / negligible significance**.
- 4.11 The baseline assessment has confirmed that the Site is maintained as private farmland and does not provide any public access.
- 4.12 There are no permanent areas of standing water, although the occasional flooding of the southern pasture and the wet ditch just north of Home Farm are noted.
- 4.13 There are no features of cultural heritage in the context, thus no impact to record
- 4.14 In visual terms - the LVIA (Ref CD10 Appendix A) identifies 'receptors' these being individuals and/or defined groups of people who have the potential to be affected by a proposal : this includes people living in the area, people who work there, people passing through by road / other forms of transport, people visiting, and people engaged in recreational activity of different types. The ability of the receptor to accommodate the change is noted as 'susceptibility'
- 4.15 The susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of –
- The occupation or activity of people experiencing the view at particular locations, and –
 - The extent to which their attention or interest may therefore be focused on the views and the visual amenity they experience at particular locations

The degree of sensitivity will vary for each receptor dependant on a number of factors that include location, setting and designation (used to inform sensitivity). The sensitivity of each receptor is based on the criteria set out above and professional judgement informed through field survey work - those classified as being of "high sensitivity" to change may include those in nearby residential properties or users of public rights of way. Those of "low sensitivity" may include those in their place of work or travelling through the area in cars, trains or other modes of transport, or engaged in some activity requiring their focus (for example work, or sports activity). A "medium" category is allowed for receptors between the two.

- 4.16 The representative views are described as part of the visual baseline assessment and consider the following criteria:
- Location of the viewpoint;
 - Type of existing view;

- Distance between the observer and the site ;
 - Extent and context of the site and/or likely view of development proposal observed ;
 - Sensitivity of the observer ; and -
 - Number of observers affected
- 4.17 The views from residential properties are assessed at ground floor level, this being considered the most used location within the dwelling. Views from upper floors are considered less sensitive but balanced with a consideration of the additional height of the viewpoint.
- 4.18 With specific regard to distance between the observer and site and the extent of the site/development observed the following descriptions are used :
- **Open views** -uninterrupted views into the site ;
 - **Filtered views** - views partially obstructed by vegetation, landform, built-form or combinations of each ; and -
 - **Distant views** - views over 1km from the site.
- 4.17 Residential receptors are considered to be the most sensitive, being from (relatively) static viewpoints. Those with a view towards the Home Farm site are noted in the following groups, on the basis of their position relative to the natural screening elements identified in section 3 -
- i) Houses at the north end of Gresford Road, between Meadow View and the Crown junction - views east towards the site : the existing level of mitigation is through - the mature woodland W4 and the hedgerows which filter views of the site, and the screening effect of Home Farm and Old Meadow Court
 - ii) Houses at the south end of Gresford Road, from Meadow View southwards - views east towards the site: the existing level of mitigation is through - the hedgerow and occasional trees, which partially screen and filter views of the site. I note that hedgerows are weaker in height and density opposite Meadow Rise, and that this will require particular attention in the design of any mitigation measures.
 - iii) Old Meadow Court - views north and east across the north half of the site : the existing level mitigation is through - adjacent hedgerows and their proximity to the viewpoint, which improves their effectiveness ; and the orientation of the front of the development looking south-west away from the site
 - iv) Y Bwthyn (13 on Plan 02 Appendix C, CD10) and Maes y Rhedyn (14) - views north across the site - natural mitigation through hedgerows and woodland which filters and frames views of the site, but noting the central boundary of stone wall which offers minimal screening.
 - v) Houses on Chapel Lane and Rackery Lane - views south towards the site ; natural mitigation as a result of distance, view filtered at present by intervening hedgerows and mature trees. For Rackery Lane, the view is oblique from rear areas only
- 4.18 More transient receptors are considered less sensitive, being from moving viewpoints noted as in traffic on the west end of the Straight Mile. In terms of the existing level of mitigation, the roadside hedgerow currently screens views of the pasture from passing traffic.
- 4.19 Walkers are also transient receptors albeit at a lower speed and thus more sensitive than those above. Walkers on the PROW FP5 on the east side of the site are generally screened by the height of the hedgerow, although views will be available through the gates which provide access between fields at intervals along the route. The hedgerow structure screens views to walkers on the network of lanes around the site, such as Chapel Lane or Gegin Lane.
- 4.20 All these effects can be mitigated by the design of the housing layout, and by the adoption of a strategy which promotes an enhanced landscape structure to address them whilst at the same time respecting the inherent qualities of the site (as summarised in section 3 above). I

will now summarise the features of the site planning which will contribute to the mitigation of these effects.

5 LANDSCAPE STRATEGY

- 5.1 Llay has expanded since the early twentieth century (as noted in 3.5 above), particularly since 1975 with the development between Nant-y-Gaer woods and Gresford Road. This has largely been incremental, with the main advantage of the proposed development at Home Farm being that it is planned in detail as a considered development, taking into account (and conserving) the attributes of its context.
- 5.2 The landscape strategy is an integral part of the illustrative masterplan developed by the Design Team. I accept this layout is provisional but the concepts provide a brief for the reserved matters stage, and the principles can be controlled by the application of conditions controlling the submission of appropriate details. The strategy allows for the creation of approximately 3ha of public open space in total, with a high proportion of this provided in the south/west corner and separating the proposed new development from the existing dwellings along Gresford Road. The open space will include additional planting, a new network of footpaths, new play facilities and informal recreation for the use of both the new-and the existing community. The development of the Site is therefore likely to result in a **beneficial** effect of **moderate significance** in the long term
- 5.3 The Landscape Strategy is noted in Section Five of the LVIA (CD10, 5.11 - 5.29), and illustrated on the submitted Plans 08 Ver2 and 09 contained in Appendix C of the Report. I have also highlighted the main features on the Plan 17 (CD69, Appendix Two) -
- i) The retention of the existing boundary features (hedgerows, trees, walling as noted 3.10.ii above), to ensure that the character of the context is retained. It is accepted that localised removal of hedgerows will be required to create access points - these will be determined at the Reserved Matters stage.
 - ii) Creation of greenspace buffer zones on the north (Straight Mile), south, and west (Gresford Road) sides, to help maintain the character of the existing boundaries and enhance the landscaped setting of the site to filter or screen views of the development.
 - iii) This also sets the building line back from the site boundary, increasing the distance between the existing and proposed dwellings
 - iv) The inclusion of further greenspace within the developed area, noted as a village green and an area to the south and west ; this will introduce areas of tree canopy within the development.
 - v) The inclusion of new footpaths to improve the amenity of the local countryside as a recreational resource.
 - vi) Paragraph 5.6 of the LVIA notes the principle of retaining the internal hedgerows as garden boundaries where possible. This can only be determined at the Reserved Matters stage, but in my experience is a principle which can be achieved through sensitive design.
 - vii) The Strategy notes general principles for new planting, with a focus on - the use of more 'natural' tree and hedgerow species which replicate those found in the adjacent area (oak, scots pine) ; the addition of trees to retained hedgerows ; and the addition of species-rich grassland in the greenspace to increase habitat diversity.
 - viii) The increased variety of tree planting (both in hedgerows and across the site), species-rich grassland, and copse (as well as future garden planting) will improve habitats for wildlife compared to the current grazing /cropping use

- 5.4 The Strategy thus establishes principles for the design of the new landscape structure, aiming to retain the existing features where possible as noted, and introducing new planting which enhances the setting and increases the diversity of habitat. Should the development proceed these principles will assist the design process at the Reserved Matters stage and the development of appropriate details to discharge the Conditions (noted as 1 and 21 in the PSoCG Ref CD65). This is the standard procedure used for the approval of external works on any planning submission.
- 5.5 The strategy will mitigate the impacts identified in 4.11 - 4.15 above, particularly through the additional planting proposed in the greenspace buffer zones and as a result of the generous distances between existing and proposed housing.
- 5.6 To illustrate the benefit of this approach I have prepared the Plan 13 in Appendix Two. This takes a series of cross-sections along Gresford Road from north to south, with the dimensions noted in the following Table 1 - this measures (as dimension 'A') the distance between the face of the existing building and the site boundary ; dimension 'B' is the distance between the site boundary and the face of the proposed houses as shown on the illustrative masterplan : and dimension 'C' is the combined total, that is the face to face dimension between existing and new housing. The final column expresses this as a percentage increase over the face to face dimension of 22m for habitable rooms : this criterion is noted in the LPGN 30 'Design' (Ref CD46), bullet point 8 in column one in the section on 'Site Layout' on page 9 -

Table 1 :

Ref	Description of Building Line (datum point)	Distance to Site Boundary (A) + description	Distance Site Boundary to New Housing (B)	Total - Existing Housing to New Housing (A + B)	% increase (decrease) on 22m guidance
A	From the building line (front) on west side of Gresford Road, north end near to Crown Junction	16.50m mature hedge + row of trees	16.50m	32.80m	+49.0%
B	From the building line (front) on west side of Gresford Road, opposite Home Farm	22.50m mature hedge	27.50m	52.20m	+137.0%
C	From the building line (front) between Walnut Grove and Oakfield Park	16.75m mature hedge + occasional trees	17.75m	39.60m	+ 80.0%
D	From the building line (front) of dwellings north of Meadow Rise	19.50m mature hedge + occasional trees	21.50m	39.30m	+78.6%
E	From the building line (front) south of Meadow Rise	23.00m Mature hedge / stone wall	22.00m	41.80m	+ 90.0%
F	From the Home Farm Barn conversions, nearest dimension to north and west.	17.00m Existing hedgerow	15.00m	35.10m	+59.0%

- 5.7 The table shows that the 22m standard is exceeded in all cases, by a minimum of 49% in the case of Section A rising to a maximum of 137% in the case of section B. In the southern end of Gresford Road the increase in the distance is almost twice the minimum standard in the case of section E (90%), and approaching this (approx 80%) at sections C and D. I accept the dimensions are based on the illustrative masterplan, but adequate distances can be secured as part of the detail design for Reserved Matters stage
- 5.8 Table 1 also notes the existing boundary condition, which I have already explained (at 3.10 above) provides a degree of natural screening or filtering of the view. I have also noted

previously (at 5.2 above) the opportunity to add further planting to the proposed greenspace buffer areas which will reinforce this.

- 5.9 I am thus confident that the development can be integrated into the surrounding landscape and that it will not have a detrimental effect on the countryside or nearby residential properties, as previously set out in the LVIA conclusion at 7.5-7.6 (Ref CD10).
- 5.10 I note that the Case Officer's (CO) review of these proposals was favourable. With reference to the CO Report (Ref CD34) in the section titled 'Design' (page 119) he states the positive effects of the illustrative masterplan proposals -

"The indicative plan demonstrates that a broadly acceptable form of development is achievable within the site, including the provision of open space and landscaping that will contribute towards the appearance of the development, particularly along the Gresford Road and Straight Mile frontages, as well as being usable for recreation".

6 RESPONSE TO THE APPLICATION

Introduction

- 6.1 The Planning Application Ref P/2014/0905 is dated 2nd December 2014. It was submitted to the Planning Committee on 5th October 2015 accompanied by a Report from the Head of Communities & Wellbeing (CO Report, Ref CD34). The Report provides a structure for my initial review, commencing with the formal consultations

Consultation Responses

- 6.2 The CO Report (Ref CD34) begins with a summary of nineteen Consultations with Council Departments, WCBC Councillors, constituted Community Groups, and statutory Consultees which are noted on pages numbered 97-107. Comment on landscape and visual issues were received from the following organisations -
- 6.3 **Gresford Community Council** : noted the effect on hedgerows. The final sentence of the CO Report summary (Ref CD34 page 98) notes – *"Also the diverse wildlife of the area and the hedgerows would have to be protected"*.
- 6.4 **Highways** : the CO Report (Ref CD34, bottom of page 102) noted the issue of pedestrian links to the rest of Llay. **Parks, Countryside and RoW** (Rights of Way) also raise this, noted in the CO Report (Ref CD34) on page 103 : their comments focus on the route of Footpath No 5 immediately outside the east boundary (and outside the Appeal Site), and request the general improvement of linkages
- 6.5 **NRW** : the second point raised on page 104 of the CO Report (Ref CD34) concerns the green spaces on the proposed development : however, it is not concerned with their relevance to landscape or visual matters, only their capacity to provide flood attenuation storage.
- 6.6 Matters arising from this part of the WCBC review are thus summarised as -
- i) A concern about the loss of hedgerows
 - ii) A concern regarding the impact of the development on wildlife
 - iii) The opportunity to improve the local footpath infrastructure in terms of links to the proposed development (if approved) and of the condition and usability of the existing routes.

Representations from Third Parties

- 6.7 On pages 107-111 the CO Report (Ref CD34) summarises issues raised by Third Parties.

I have also read through the individual letters sent to the Planning Department during the statutory consultation period, as well as further representations received as part of this Appeal. Their prime focus is on - first, the principle of the development and its impact on the landscape, which I consider as part of the Reason for Refusal (to be considered in Section 5 below) : and second - the effect of the development on the local infrastructure of schools, healthcare, drainage, and highways (traffic). These matters are considered in the PSoCG and Evidence of my colleagues.

6.8 The Third Party submissions contain matters of landscape and visual relevance which I will now review. In my opinion, some of the points made in objection are in error, and I will address these where relevant to remove them from the debate. I will also comment on other opinions expressed in the submissions.

6.9 The Third Party representations begin with the Gresford Road Action Group, noted as a letter with 265 signatures objecting to the development. The CO summary includes the following statements -

6.10 The first point on page 107 notes -

Llay has had many new small developments over the years and have been infill sites, brown field sites and Gresford Road is quite clearly the defining boundary of the village.

The issue is subsequently noted in the WCBC Statement of Case (Ref CD63) at 6.3 and I will consider the point in my response to this.

6.11 Halfway down page 108 the summary notes -

Gresford Road has a countryside feel and is a pleasant area leading to Llay centre, its distant vista of the Cheshire Plain is a wonderful view to behold

My appraisal of the site and the effect of the residential context has been noted at 3.3.iv above - Gresford Road is developed on the west side with a mix of suburban housing and thus cannot be considered as having a countryside feel ; rather, it is suburban. In terms of the longer views claimed, I refer to Plan 04 (the agreed ZTV, Appendix 4 in the (PSoCG Ref CD65) which shows the screening effect of hedgerows and trees east of the site, generally filtering longer distance views towards the east in which, from ground level, Helsby Hill can be seen.

6.12 The CO Report (Ref CD34) summarises individual representations from Neighbours on pages 111 - 114. I note that the additional matters of landscape and visual relevance which this summary contains are as follows -

6.13 The seventeenth bullet point (halfway down page 111) notes a concern over the loss of 'Greenbelt' land : I assume this is a generic term, as land protected as 'Green Belt' (as defined in Planning Policy Wales Edition 8 (January 2016) (PPW) is referred to as 'Green Barrier' within the WCBC UDP : the issue is raised several times in Residents' letters, but for avoidance of doubt the development site has no such formal protection, as agreed in the PSoCG (Ref CD65) at paragraph 3.2.

6.14 Bullet point 25 on page 112 notes -

Additional planting around Meadow View needed to protect views and minimum distances to houses should be agreed.

Meadow View is at the south end of Gresford Road : section E on Plan 13 in Appendix Two is just south of this estate road. With further reference to Table 1 in 5.6 above the distance between the dwellings is noted at 41m exceeding the minimum standard by 90%, and this is not an issue of concern. The landscape strategy also includes proposals to strengthen

existing hedgerows by gapping up and planting hedgerow trees, and this will enhance the sense of privacy.

6.15 Bullet point 12 on page 113 notes -

Gresford Road sets the demarcation between Llay, Burton/Rossett. The villages will lose their indemnity (sic - identity ?), distinctiveness and sense of place.

The concern is unfounded : these are entirely separate settlements to the north and east, with the nearest edge of Burton (here defined by the junction of Roseway and Croeshowell Lane) being 0.89 miles (1.42km) away (as the crow flies) from the nearest point (being the north east edge) of the development site, and Rossett (here defined by the junction of Station Road and Marford Road) being 1.75 miles (2.8km) away. Neither can be seen from Llay or from the Home Farm site.

6.16 Bullet point 13 on page 113 notes -

There are no play areas on this side of the village

Reference to the landscape strategy (Appendix C to LVIA CD10, Plan 08) shows that play facilities are included at two locations, denoted by the large asterisks as at the approximate centre (on the village green) and in the south/east corner within the green space. I accept that these are indicative and that the location could change subject to the final layout submitted as part of the reserved matters. The CO Report (Ref 34) at page 129 also included a proposed Condition (No.16.i) which requires the details of formal play equipped play areas to be provided, and this has been acknowledged in the proposed Condition No 21 included in the PSoCG on page 27 (Ref CD65). The development will thus meet its own obligations in respect of play, and moreover these facilities will be available for the benefit of the existing adjacent residents of Llay.

6.17 Bullet point 16 on page 113 notes -

No environmentally friendly systems to be used in the development

In respect of the landscape and visual issues I emphasise that the illustrative masterplan is based on a full assessment of the baseline landscape and visual effects, and that the proposals to mitigate residual effects have been fully integrated into the layout. In my experience it is standard practice for these to be controlled by Conditions, and note that these have been set out in Section 7 of the PSoCG (Ref CD65) pages 23-29.

6.18 Bullet point 4 on page 114 concerns the impact on the Straight Mile. If the development is approved the access arrangements have to be determined. The proposal for a roundabout on the illustrative masterplan is a development requirement to address traffic issues, and the landscape strategy includes the following measures which will mitigate the visual impact : these are illustrated with reference to the sections on the LVIA Plan 09 (Ref CD10 Appendix C), and are designed to retain existing features and emphasise the straight nature of the route by -

- i) The retention of the existing roadside hedgerows (other than where the break is necessary for the access)
- ii) The creation of a linear greenspace /green buffer between the retained hedgerows and the housing, which increases the distance between the road and the dwellings to minimise encroachment on the cone of the view from the road.
- iii) The proposed new footway is located within this greenspace corridor, allowing the roadside hedge to be retained and thus avoiding any 'urbanisation' of the existing road corridor landscape.

- iv) The planting of linear woodland along the southern edge of the greenspace (along the private curtilages of the proposed housing) to emphasise the straight alignment by creating a canopy of trees running parallel with the road as an informal avenue.
- 6.19 The section on Plan 15 (Appendix Two) clarifies how this planting can contribute to habitat diversity through additional tree planting, understorey shrub planting, and the introduction of species-rich grassland.
- 6.20 A similar concept can be considered for footpath routes along Gresford Road, with the roadside hedge retained and the new link path located to the east within the greenspace ; the variety of planting can follow the principles set out on Plan 15 (Appendix Two) and subject to control through the proposed Condition 21 (PSoCG Ref CD65 at page 28)
- 6.21 This accords with the approach suggested by Highways, that new footways should be provided along the full length of the site boundary to ensure the site is properly integrated with the existing village : the CO Report summary (Ref CD34 at page120,final paragraph) supports the concept which had already been shown on the submitted for their review (being plan 08 Ver2 (LVIA Ref CD10, Appendix C) and the accompanying landscape strategy at 5.1 - 5.29) -

“Depending on the layout of the development it may be appropriate to retain some existing boundary features and route the footway behind it”.

This principle is agreed in the PSoCG (CD65) at 5.6 (page 16).

- 6.22 The paragraph concludes such matters will be considered in more detail at the reserved matters stage : they can also be subject to a Condition.
- 6.23 This section concludes noting a concern over the impact on wildlife and protected species.
- 6.24 The final part of the CO Report (Ref CD34, pages 114 - 125) 'Special Considerations' is a comprehensive review of issues raised under 23 separate headings. None of these specifically addresses landscape quality, although the potential effect on visual quality and landscape in terms of the interaction between people and place is noted in favourable terms -
- 6.25 In the section titled 'Design' (on page 119) -

“The indicative plan demonstrates that a broadly acceptable form of development is achievable within the site, including the provision of open space and landscaping that will contribute towards the appearance of the development, particularly along the Gresford Road and Straight Mile frontages, as well as being usable for recreation”.

- and later on the same page, under 'Visual Impact' it is noted -

“The visual impact of the development will primarily be limited to the immediate locality, particularly Gresford Road, but also from the eastern end of Rackery Lane, the southern end of Chapel Lane, as well as from the Straight Mile. The topography of the wider landscape together and (sic - with ?) features within it, such as trees, hedgerows and buildings, prevent significant longer distance views of the site”

- 6.26 The WCBC (CO's) assessment of the Application is thus based on a full appraisal of representations received from a wide variety of organisations and individuals. It concludes -
- “Whilst I appreciate the site lies outside of the settlement limit for Llay and therefore conflicts with policy PS1, the development will make a significant contribution towards meeting current and future housing needs in the County Borough*
- I am satisfied that an acceptable form of development is achievable without prejudice to the amenity of the occupiers of neighbouring properties, highway safety, and ecology. The development is therefore in accordance with UDP policies GDP1, EC6, H7, CLF5 and T8”*

- 6.27 I believe that in taking this balanced view on the acceptability of the proposed development the Case Officer has taken into account the landscape and visual issues and has concluded that the effects are either inconsequential, and that they can be managed through appropriate design, and also controlled by the application of Conditions.
- 6.28 Despite this recommendation from their professional Officer the Planning Committee Meeting (5th October 2015) determined to refuse the Application.

Decision Notice and Reason for Refusal

- 6.29 The Decision Notice (Ref CD33) is dated 5th October 2015. A single reason is given -

"The proposed development lies in open countryside outside settlement limits as defined in the adopted Wrexham Unitary Development Plan. The scale of development is also too great in proportion to the size of Llay and it does not represent a logical extension to the existing settlement. To allow the development would be contrary to PS1, PS2 and H5 of the adopted Wrexham Unitary Development Plan."

- 6.30 Of the policies specifically mentioned, PS1 notes that new development for housing, employment, and community services will be directed to sites within defined settlement limits/employment areas. Policy H5 sets out the type of development which might be permissible outside defined settlement boundaries. Both these issues are addressed by my colleague Stephenie Hawkins.
- 6.31 My Evidence will thus focus on the UDP Policy PS2 (Ref CD40) as being relevant to landscape and visual matters. I will now summarise the key issues arising from the overall WCBC response to the Application, to provide a structure for the remaining sections of my Evidence.

Summary of Key Issues

- 6.32 Policy PS2 notes -

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

- 6.33 The WCBC Statement of Case (Ref CD63) at paragraph 6.3 expands on PS2 stating -

The development will result in a significant intrusion into the rural landscape to the north-east of Llay. Due to its location and scale the appeal proposal does not represent a logical extension to the existing built up area of the village and will materially and detrimentally impact upon the countryside. It is the Council's view that these considerations significantly outweigh the need to increase the supply of land available for housing in the County Borough in this instance.

- 6.34 The first issue is whether the proposed development would constitute a significant intrusion into the rural landscape north-east of Llay, and whether this would have a detrimental effect on the countryside.
- 6.35 The second issue is whether the proposal represents a logical extension to the built up area of the village.
- 6.36 I will consider other matters of detail which, whilst they are easily resolved at the Reserved Matters then relative to the planning policy identified in the WCBC Statement of Case, to demonstrate how the strategy has accommodated the principles, and to support the robust approach taken with the design of the development.

7 EFFECT OF THE DEVELOPMENT ON LANDSCAPE CHARACTER

- 7.1 I first note that at the point of determination the Council had not provided the Appellant with any evidence to refute the findings of the LVIA Ref CD10) which was carried out by an experienced Chartered Landscape Architect and which, at paragraph 7.8 concluded that -

“... the development proposal will not result in any adverse effect considered to be of significance to either the character or appearance of the site and surrounding landscape setting that would make this proposal unacceptable in landscape and visual terms.”

- 7.2 This LVIA was submitted as part of the Application and was thus available for the Case Officer's Report ; there is no reference to landscape impact in any of the consultations, the effect on landscape character only being noted by Third Party and Neighbour representations. The final conclusion (page 125) mentions the amenity of neighbouring properties, highway safety, and ecology but not landscape. I believe it is thus reasonable to assume that the professional Officers agreed with my assessment.

Does the proposed development constitute a significant intrusion into the rural landscape ?

- 7.3 To address this issue I refer to the Landmap SPG mentioned previously at 6.4 and contained in my Appendix One as document ref TH01. It supports the UDP policies through the conservation and enhancement of the Borough's landscape and its natural and built features of significance, and sets out 15 areas (plus sub categories) of landscape characters throughout the Borough
- 7.4 The Site is within LCA 8 “Gwersyllt, Llay, Gresford, Borrass” described overall as “A valuable lowland plateau of well-drained agricultural land, sand and gravel extraction, and commuter villages with a mining history, which surrounds Wrexham to the north and east”. LCA8 is also noted as a centrally situated lowland terrace which has historically been a favourable area for settlement and farming, and I interpret that this (along with the potential for exploitation for minerals) as the principal value. In further support of this interpretation, I have previously explained (at 4.3 - 4.5 above) that the prevailing character of pasture, dividing hedgerows, and linear woodlands is a common feature of the landscape context north and east of Llay.
- 7.5 I have extracted the Map of this area from the SPG document and included it as Plan 10 in my Appendix Two : the extract marks the location of the Home Farm site in relation to the Character Area. From this the proposed Home Farm development site is relatively small, and located at the edge of the northern third of the character type. The footprint of the proposed development is immediately adjacent to the existing settlement of Llay, thus in the wider context is a logical extension of the village providing a balance of residential land use either side of Gresford Road.
- 7.6 I have previously mentioned (4.3-4.4 above) the dominance of a rural character in the landscape north and east of Home Farm. Within this context the residential development is a negligible intrusion in visual terms : as agreed between the parties (PSoCG CD65 Appendix 4) the zone of visibility is limited to the immediate area, which (with reference to the LVIA CD10 Appendix C Plan 03) is defined by the encircling woodlands (W3, W6, W7 and W5) and hedgerows (W2) on Chapel Lane.
- 7.7 In landscape terms the principal features of the site edge are retained to continue their contribution to the rural setting. The prevailing land cover of pasture is a common feature in the area, identified by the Landmap classifications and extending further into the neighbouring authority. The use of a very small proportion (15.68ha) for residential development is again a negligible amount.

Is the proposal a logical extension to the built up area of the village.

- 7.8 The Summary section of the Landmap classification LCA8 recognises that one of the settlement characteristics is of "*Growing commuter villages, originally mining communities*" : Llay clearly fits this description, owing its existence to the establishment of the colliery in 1913 (DAS second column p10, Ref CD8). Further, the potential for residential development is acknowledged in the final bullet point of 'Visual Character' -

Villages are semi-rural with extensive suburban development

I have already noted (3.3.iv above) that suburban development is already a feature of Llay, being an extension of the original core village on to land between Nant-y- Gaer woods and Gresford Road. I refer to the six historical development plans included as TH03 of my Appendix One : these identify the emerging pattern of residential development in blue -

Llay 1912 - shows the initial village established next to Llay Road, a logical location in being immediately next to the site of the colliery then being opened up. Development along Gresford Road consists of scattered dwellings (primarily a cluster at Home Farm and at Y Bwthyn / Maes y Rhedyn).

Llay 1938 - shows the expansion of the Llay core south and eastwards, assumed to be due to the success of the colliery, but kept within the natural constraint to eastwards development represented by Nant-y-Gaer. Residential development also took place on Rackery Lane (north of the Crown junction). The pattern of development on Gresford Road is unchanged.

Llay 1962 - minor extensions of Llay westwards on to the opposite side of New Llay Road (B5425), and new development at the Crown crossroads (Gresford Road-Llay Road) - otherwise, the pattern of development along Gresford Road is unchanged.

- 7.9 I note that Llay colliery closed in 1966, removing the relationship between the village and the colliery as a place of work. The historical development sequence continues with -

Llay 1975 - further expansion west of New Llay Road. The pattern of development on Gresford Road is unchanged.

Llay 1984 - no further change to the original Llay village area west of Nant-y-Gaer. On Gresford Road, two large areas of housing have been developed, off Fair Oaks Crescent, Oakfield Park, and Forest Road leaving a central space between.

Llay Present Day - no further change to the original Llay village area west of Nant-y-Gaer. On Gresford Road the gap between the two areas noted above has been filled (Meadow Rise), thus completing the residential land use to the full extent as far as the south east end of Nant-y-Gaer wood where it meets the edge of the Alyn valley.

- 7.10 The final plan in the sequence shows the Llay Future Growth Scenario. It identifies the footprint of the village in the event of the Home Farm site being approved for development, in response to the current need for housing as identified in the Evidence of Stephenie Hawkins.
- 7.11 In summary until 1962 all expansion of the village took place to the west of Nant-y-Gaer, keeping the working settlement together. The colliery closed in 1966, following which a direct connection with this as a place of work became less relevant, and the pressure for housing of a more suburban nature lead on to the development between Nant-y-Gaer and Gresford Road, undertaken between 1975 and 1984. Nant-y-Gaer remains as a feature which divides the residential land use of Llay into two distinct parts, the original settlement to the west (directly associated with the mining), and newer development to the east (satisfying general housing need). The initial 'logical' edge to Llay was thus Nant-y-Gaer but this no longer remains the case: the newer housing to the east is a suburban expansion taking advantage of an established route (that is, Gresford Road) for access, one not directly associated with the original village.

- 7.12 Drawing on my earlier experience with the New Town Development Corporation I would say that the logical edge to Llay in terms of development potential would now be the line of the PROW FP5, leaving the pasture east of this point as a transitional space before the enclosing circle of woodland (noted W3, W6 and W7) marks a 'gateway' on the route of the Straight Mile.
- 7.13 The LCA8 assessment (Appendix One TH01) does note that high quality arable land is vulnerable to residential development, but with the reference to '*suburban development*' and '*commuter villages*' elsewhere in the summary I conclude that these features are accepted components of the local Character Area, and that Llay is a clear example of the prevailing settlement characteristic.
- 7.14 The Welsh Assembly Government states that the key role of the planning system is to achieve sustainable development, now and for future generations, between economic development to secure rising living standards and to protect and enhancement of the environment. The current edition (Edition 8 January 2016) of National Planning Policy Wales (PPW8) (Ref CD36) includes the following guidance on to promote good quality environmental design.
- 7.15 In Section 4 (Planning for Sustainability) PPW8 notes -
- 4.7.8 *Development in the countryside should be located within and adjoining those settlements where it can be best be accommodated in terms of infrastructure, access and habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design.*
- 7.16 Applying these principles to the potential expansion of Llay east of Gresford Road I stress that -
- i) The Home Farm site is adjoining an existing settlement
 - ii) Extensive suburban development is a feature acknowledged in the landscape character assessment of the Council's Landmap SPG.
 - iii) The features of the existing site and the potential for enhancement through the landscape strategy allow the development to be accommodated in terms of access, habitat and landscape conservation.
- 7.17 Having accepted the residential expansion of Llay to the west side of Gresford Road expansion further development immediately to the east of this route is in fact logical against the PPW8 criteria, particularly in view of the a coherently planned expansion to taking further advantage of the established route of Gresford Road for access.

8 VISUAL EFFECT OF DEVELOPMENT

- 8.1 The visual containment of the site is noted on Plan 04 of the LVIA (Ref CD10) Appendix C which shows the extent of visibility : this is a mapped illustration of the statement in the PSoCG (Ref CD65) at 5.2 that -

The visual impact will be limited to the immediate locality, primarily Gresford Road, together with the approach from Rackery Lane, Chapel Lane and Straight Mile

- 8.2 The Plan is an agreed statement (included as Appendix 4 in the PSoCG Ref CD65), It shows that towards the farmland to the north and east the extent is limited by the hedgerows along Chapel Lane, and (with reference to the key on Plan 03) the southwards arc of woodland noted as W3, W6, W7, and W5 (summarised in the LVIA at 2.15). In visual terms therefore, the alleged intrusion into countryside is minimal.
- 8.3 The visual effect is considered at two points in time ; first, on completion of the development prior to any new planting, noted as 'in the short term' in the following section. This assessment takes into account the existing level of mitigation (as 4.17 above), and the instant mitigation through the site planning, this primarily being the perimeter greenspace buffer zones : as previously noted (5.5 above) provides distance between the existing and the new dwellings, and exceeding the recommended 22m face to face dimension by between 49% and 137%. It also includes the enhanced screening achieved through the additional planting (trees, hedgerows, and understorey shrubs) which will mitigate the views experienced by receptors.
- 8.4 The 'long term' thus takes into account the further mitigation introduced by the planting elements of the landscape strategy
- 8.5 Receptors in houses at the north end of Gresford Road will be filtered by the mature woodland W4 and the hedgerow, and partially screened by Home Farm itself : the impact is limited to a relatively low number of houses which face towards the Site, and those using the road itself. In the short term this is moderated by the greenspace buffer which (as noted in Table 1 at 5.12 above) increases the distance to the new housing, and is considered an **adverse effect of moderate significance**. At the south end of Gresford Road there are fewer trees to contribute to the natural screening, but the greenspace is wider and the maturity of the hedgerow is considered to retain the same effect. In the long term, the effect is further moderated by the planting established in the greenspace buffer immediately east of the hedgerow
- 8.6 Receptors in traffic on the west end of the Straight Mile. The roadside hedgerow currently screens views of the pasture from passing traffic, and further moderation is introduced by the greenspace buffer. In the short term dwellings will be seen above the hedgerow, and the development is likely to result in an **adverse effect of moderate / high significance**. In the long term this will be moderated by the proposed planting of trees and understorey planting, as noted in principle on Plan 09 (LVIA Ref CD10 Appendix C)
- 8.7 There are few receptors to the north (Chapel Lane and Rackery Lane) ; views are filtered at present by intervening hedgerows and mature trees, and the development is likely to result in a similar assessment of **adverse effect of moderate / high significance** in the short term. In the long term, the effect is moderated as the planting of the perimeter, especially along the Straight Mile, matures.
- 8.8 Receptors in the two houses on the south boundary (identified as 13 and 14 on Plan 02 LVIA Ref CD10 Appendix C) have views of the site northwards. The immediate effect is moderated by the greenspace buffer zone which at this point is at its widest. In the short term, it is likely to result in an **adverse effect of moderate significance**. In the long term the effect will be moderated by the new planting within the greenspace.
- 8.9 This principle can be considered further with reference to the upper photograph on Plan 05 (LVIA CD10 Appendix C). Taken from within the site, looking out, it shows the effect of a

single line of trees in softening the view of houses on the opposite side of Gresford Road ; this illustrates the general aim of the landscape strategy, providing additional tree cover on the boundary to control views towards the development : the use of the word 'control' is deliberate, as the design detail can manipulate the density of the cover to achieve total or partial screening, or to frame more distant views to features within the greenspace. Such considerations are for the reserved matters stage, controlled by the proposed Conditions noted in the PSoCG Section 7 (CD65)

- 8.10 I am thus confident that the development can be integrated into the surrounding landscape and that it will not have a detrimental effect on the countryside. There is consequently no conflict with the Policy PS2

9 COMPLIANCE WITH PLANNING POLICY

- 9.1 The WCBC Statement of Case (Ref CD63) at 5.3 notes eleven UDP Planning Policies considered relevant to the appeal proposals : of these, it is agreed that CLF7 - "Informal recreation – countryside and water resources" is not relevant : this is noted in the PSoCG (Ref CD65) at 4.5 where it is agreed that a further Policy (CLF6 - Public Rights of Way) is also considered to be relevant. At 5.4 it lists a further five references, in the form of Local Planning Guidance Notes (LPGN)

- 9.2 I will first consider the development proposals relative to these other policies that are relevant to landscape and visual impact: that is, I will here consider landscape and visual matters within the - policy references GDP1, CLF5, CLF6, EC4 and EC6. I will clarify how (in my opinion) the submitted proposals comply with these requirements.

Policy GDP1 Development Objectives (UDP p.16 Ref CD40)

- 9.3 Policy GDP1 notes eleven criteria (a - k) for all new development. The following five criteria in particular include requirements for consideration in the assessment of landscape and visual effects, and also in the landscape strategy to mitigate any such effects -
- a) *Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.*
 - b) *Take account of personal and community safety and security in the design and layout of development and public/private spaces.*
 - d) *Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.*
 - e) *Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible.*
 - h) *Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.*
- 9.4 The application P/2014/0905 is outline for up to 365 dwellings and a 300m² retail unit, with all detailed matters reserved. I have explained in Section 5 (above) that the GDP1 criteria can be met in the design of the external spaces and layout, particularly with reference to -
- i) Item (a) - the retention of the existing perimeter landscape features and the inclusion of a strategy for landscape works as an integral part of the development.
 - ii) Item (b) - the illustrative layout promotes overlooking of routes and greenspace.

- iii) Items (d) and (e) - provision of safe access, including separate pedestrian linkages along Gresford Road, to the Straight Mile, and on to Footpath No 5 to the east.
 - iv) Item (h) - whilst the site has no significant nature conservation / wildlife interest the landscape strategy protects the continuity of the perimeter hedgerows and sets out principles for overall enhancement through the introduction of non-agricultural greenspace and new planting
- 9.5 In my experience, these are straightforward matters independent of the more detailed resolution of the housing layout / house types per se, and will be easily controlled by the Conditions proposed in Section 7 of the PSoCG (Ref CD65).
- Policy CLF5: Open Space Requirements from new Residential Developments** (UDP p. 59 Ref CD40)
- 9.6 Policy CLF5 notes -
- "New development of ten dwellings or more must provide informal public open space within the site at a minimum level of 0.4 hectare per 50 dwellings, be conveniently located for users, and usable for playing field(s) and/or equipped children's play area(s) and open amenity area(s)"*
- 9.7 With reference to the PSoCG (Ref CD65, at 5.5) it is agreed that the proposals are not contrary to this Policy : as shown on the Landscape Strategy Plan 08 Ver2 (Ref CD10, Appendix C), the provision exceeds this minimum threshold -
- 9.8 This is based on the following provision - assuming all the 365 dwellings are built there would be a requirement for 2.92ha of open space ($365 \div 50 = 7.3$, $\times 0.4\text{ha} = 2.92\text{ha}$). As shown, the illustrative masterplan (LVIA Ref CD10, Plan 08 Ver2 Appendix C) includes 3.18ha of public greenspace, distributed around the perimeter and in the village green ; I have highlighted this provision on the Plan 11 (in Appendix Two) -
- i) **Ref OS-1** - linear greenspace along the Straight Mile, to the east and to the west of the proposed site access (0.576ha)
 - ii) **Ref OS-2** - linear greenspace along the boundary of Gresford Road (north), with the existing tree belt and hedgerow (noted W4 on Plan 03, Appendix One) retained (0.177ha)
 - iii) **Ref OS-3** - the proposed village green (0.577ha)
 - iv) **Ref OS-4** - the green space / buffer zone along Gresford Road (south) and on the south/east boundary adjacent to the woodland noted W4 (Plan 03, Appendix One) (0.976ha).
 - v) **Ref OS-5** - the potential for a linear green outside housing on the east side of the development (0.179ha).
 - vi) **Ref OS-6** - the potential for greenspace to the north of Home Farm, as part of the buffer landscape to the converted farm buildings (0.061ha).
 - vii) **Ref OS7** - greenspace link along Gresford Road (0.240ha)
 - viii) **Ref OS-8, OS-9, and OS-10** - internal road corridor greenspace (0.394ha)

CLF6 Public Rights of Way (UDP p. 59 Ref CD40)

9.9 Policy CLF6 notes -

"The existing pattern of public rights of way will be protected, maintained and improved and any potential new routes will be identified and safeguarded"

- 9.10 It is agreed there is no conflict with CLF6 (PSoCG Ref CD65 at 5.2, bullet six). The route of the nearest PROW Footpath No 5 is shown on Plan 02 (LVIA Ref CD10, Appendix C). This links Gegin Lane and Chapel Lane, and crosses the Straight Mile at the north/east corner of the site.
- 9.11 The landscape strategy provides new routes in respect of the second strand of the Policy. I have prepared Plan 12 (Appendix Two) to highlight the improvements included in the illustrative masterplan (Appendix C to LVIA CD10, Plan 08 Ver2). These will be of benefit to the existing residents : they run through the perimeter greenspace and are -
- i) **Ref FP-A** - approx 557m new path running through the green buffer south of the retained hedge along the Straight Mile.
 - ii) **Ref FP-B** - approx 266m new path running through the green space between Gresford Road and Footpath 5.
 - iii) **Ref FP-C** - approx 82m new path across the green buffer to link to Gresford Road just south of the Crown junction.
 - iv) **Ref FP-D** - approx 32m new path to link the development to the existing PROW FP5
- 9.12 The proposed path FP-D provides a direct link between the development and Footpath No 5 on the east boundary : this can be arranged to suit the position of the existing field access, thus avoiding any effect on the hedgerow.
- 9.13 A total of 937m of footpath routes are thus included in the landscape strategy, opening up access to areas currently denied due to the farming activity. These new routes will improve links to the adjacent PROW infrastructure, and can be guaranteed by a Condition. The submitted proposals thus also comply with the enhancement criterion of the Policy.

EC4: Hedgerows, Trees and Woodland (UDP p. 20 Ref CD40)

9.14 Policy EC4 notes -

"Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape. Development which results in the loss or significant damage to valuable trees, important hedgerows or ancient woodland sites will not be permitted".

- 9.15 I have summarised the landscape strategy proposal in my Evidence at 5.3 above, with reference to the submitted LVIA (Ref CD10). It is agreed that there are no extant features on site which comply with the 'valuable', 'important' or 'ancient' criteria noted in EC4. At Home Farm the policy thus focuses on the conservation and management of extant features. I have explained how these are accommodated and enhanced within the landscape strategy and thus believe the proposals follow the principles of this Policy.
- 9.16 In terms of the impact on trees I have noted that there could be the potential loss of a single tree (T24, a Category B Oak) to accommodate the Gresford Road access, in the event of the Plan 8 Ver 2 illustration being proposed at the Reserved Matters stage. The Tree Survey report (LVIA Appendix B (Ref CD10) notes 29 mature trees, 28 of which would be retained in this worst case scenario : this would be a minimal effect on the site landscape, and one which can be mitigated by further tree planting as noted in the Landscape Strategy

- 9.17 In respect of hedgerows it is agreed that none of these are protected or designated (the PSoCG Ref CD65 at 5.2). I have also noted the principle of retaining as much of the internal dividing hedgerows as possible through considered design at the reserved matters stage. The retention of perimeter hedgerows can, however, be considered in more detail : I have already noted their importance in the landscape strategy in maintaining the character of the existing site edge, and will now provide further detail to show how this is achieved -
- 9.18 I have analysed the impact on perimeter hedgerows on Plan 14 in my Appendix Two. This highlights where they are to be retained, where they are to be removed, and where new perimeter hedges are planted to maintain the character of the site edge. The summary is as follows -
- i) Hedgerows to be retained (coloured green) - 1,655m
 - ii) Hedgerows to be removed (coloured red) - noted as 101m (for the access off the Straight Mile) ; 53m (for the access off Gresford Road) ; and 7m (for the pedestrian link on to Gresford Road near to the Crown). This is a total of 171m.
 - iii) New perimeter hedgerows to be planted (coloured yellow) - noted as 229m, planted to follow the lines of the new access roads at the entry points, plus a new hedge along the south side of the existing Home Farm yard area.

In summary of the total of 1,655m existing perimeter hedgerows 171m will be removed (10.3%) : this is not significant in the context of the site, especially as the landscape strategy introduces 229m of new hedges, increasing the total length on the perimeter to 1,713m (an increase of 3.5%).

EC6: Biodiversity Conservation (UDP p. 22 Ref CD40)

- 9.19 Policy EC6 notes -

"Development either within or close to sites of biodiversity interest will only be permitted where it can be clearly demonstrated that the need for the development outweighs the need to safeguard the intrinsic nature conservation value of the site. Where such development is permitted, damage should be kept to a minimum, and compensatory measures should be provided. Measures to improve the biodiversity value of sites and enhance their natural conservation interest and landscape quality including the establishment of local nature reserves, will be supported"

- 9.20 It is agreed that there are no areas of biodiversity interest within the site (ref PSoCG Ref CD65 at 3.2), nor any historic environmental designations, nor Tree Preservation Orders (ref PSoCG at 3.3). It is also agreed that ecology is not part of the Reason for Refusal and that there is no conflict with the WCBC UDP Policy GDP1.
- 9.21 The retention of the perimeter hedgerows is a worthwhile contribution to the continuity of habitat around the site : it also retains the existing edge character in views towards the site. The additional planting introduced by the Landscape Strategy can also be detailed to promote habitat diversity, particularly in the areas of open space (Plan 11 Appendix Two). This was noted in the submitted LVIA (Ref CD10 at 5.11-5.29) with reference made to the need to collaborate with an Ecologist over the specification of plant species. The resulting detail would be controlled by the proposed Condition 21 (PSoCG Ref CD65 at Section 7 page 28)
- 9.22 If the Appeal is allowed and the development completed it is accepted a significant area of farmland would, over time, be converted to a predominantly suburban landscape. Although open areas in such a setting are planned and organised spaces, these would not necessarily be of low ecological value. The green infrastructure noted in the illustrative masterplan (Appendix One, Plan 08) includes planted roadsides and trees, open green and public amenity spaces in new developments, and these thread through and around the built environment helping to link housing areas to the wider rural landscape. This improves ecological networks of natural habitats to provide valuable links for the migration, dispersal

and genetic exchange of species in the wider environment : the linkages are further improved if the landscape design is sensitive to wildlife, with the following main considerations -

- i) retention and safeguarding of existing trees
- ii) use of native species in green infrastructure planting,
- iii) specification of planting stock propagated from local provenance,
- iv) diversity of species where appropriate
- v) proposals accompanied by landscape management with objectives to maintain and enhance ecological value.

9.23 As an example of how habitat diversity can be introduced is illustrated on Plan 15 in Appendix Two. This is a sketch section showing the principles of introducing more diversity in a limited space - starting with the existing hedgerow this would involve -

- i) Additional tree planting immediately adjacent to the hedge (thus allowing the hedge to be cut as required).
- ii) Establishing a species rich grass cover (a mix of tall grasses with wild flowers) next to the hedge to provide food / nectar sources (as well as providing visual quality)
- iii) Mown grass adjacent to footpaths to present a 'tidy' well-cared for appearance - the width can vary to suit the needs of informal recreation.
- iv) Repeat the profile on the opposite side of the greenspace, the section showing the potential for new copse planting with understorey shrubs against the housing edge as further variety.

The existing situation includes only the hedgerow and the grazed / cropped pasture as habitat types : the strategy outlined above contains five different types of habitat.

9.24 A Great Crested Newt (GCN) mitigation strategy is in preparation, and this will provide guidance as to how potential habitat could be retained and enhanced. The current draft of the GCN strategy is appended to the Evidence submitted by Stephenie Hawkins.

9.25 In my experience, at this Outline stage, these matters are typically the subject of the Conditions : I note these are already drafted and contained in Section 7 of the PSoCG (Ref CD65), in order - 6 (Ecology, including Management Plan), 10 (Trees), and 21 (Landscaping and Public Open Space).

9.26 It is anticipated that with the passing of time, residential gardens and managed greenspace will mature and a more diverse mosaic of habitats will develop. I accept that the quality would be influenced by how individual residents decide to use their gardens and the considerations made for wildlife, but it is almost certain that the gardens will include more flowering species which will be an improvement over the existing grazed/cropped grassland..

9.27 The landscape strategy thus seeks to retain, conserve, enhance and diversify the quality of the site : there is no conflict with this Policy.

Local Planning Guidance Notes (LPGN).

9.28 The policies of the UDP are supplemented by LPGN. The WCBC Statement of Case (Ref CD 63) at 5.4 notes the following are applicable to the appeal proposals -

LPGN10: Public Open Space in New Housing Development
LPGN16: Parking
LPGN27: Developer Contributions to Schools

LPGN28: Affordable Housing

LPGN30: Design

The list does not include LPGN7 'Landscape and Development' nor the LPGN17 'Trees and Development' (although the latter was provided by the Council with their appeal questionnaire and is listed in the Core Documents as CD43). Of those listed in the WCBC Statement of Case LPGN10 and LPGN30 cover matters of relevance to the landscape and visual issues -

LPGN10: Public Open Space in New Housing Development (Ref CD41)

- 9.29 The guidance uses the National Playing Field Association (NPFA) standards for this provision based on a recommendation of 2.43 ha (6 acres) per 1000 bedspaces. It proceeds to note that WCBC is keen to ensure that -
- a) *Adequate public open space is provided within new housing developments*
 - b) *Developers should enter into legal agreements in order that funding can be provided for the future maintenance of open spaces and play equipment.*
- 9.30 A third point (c) notes exceptional circumstances where new developments are in close proximity to existing play areas: this does not apply to the Llay context.
- 9.31 As noted 6.29-6.31 above it is agreed that the proposals are not contrary to the WCBC Open Space Requirement Policy CLF5 (ref PSoCG at 5.5 (Ref CD65): given the fact the WCBC refer to the NPFA criteria in this Policy I thus consider it reasonable to assume that the recommendations of LPGN10 have been met.

LPGN30: Design (Ref CD46)

- 9.32 The Guidance sets out three steps as a structure for development : these are - Step 1 Site Appraisal ; Step 2 - Constraints & Opportunities ; Step 3 - The Design Solution. In the case of the Home Farm development these are noted in the DAS (Ref CD8).
- 9.33 Guidance for landscape proposals are set out in the third step (item (iv) as 22 bullet points on pages 12-13. I have explained the development of the landscape strategy for the planning submission and consider that this complies with the following recommendations -
- i) Bullet 1 - the landscape strategy is an integral part of the scheme, submitted with the planning application, and not an afterthought.
 - ii) Bullet 2 - the public open space (POS) strategy is an integral part of the scheme, and follows the principle of natural surveillance as noted.
 - iii) Bullet 3 - the proposed areas of POS are either continuous (on the north, south, and west sides) or in blocks within the illustrative masterplan, as noted
 - iv) Bullet 5 - the existing trees (bar potentially one as noted 6.5.(ii) above), and the perimeter hedgerows (accepting localised removal for access) are retained, thus following this guidance. Also potentially, subject to detail design for reserved matters, lengths of the internal hedgerows can also be retained.
 - v) Bullet 8 - the benefit of retaining existing walls and hedges is noted against bullet 5 above.
 - vi) Bullet 9 - boundaries on to open countryside are noted as being retained / enhanced hedgerows in the landscape strategy.
 - vii) Bullets 10 (page 12), 13 - 20 (page 13) - I have summarised the landscape strategy at 6.5-6.6 above : this proposes the enhancement of biodiversity and habitats as well as the planting of new copses and hedges.

- 9.34 The recommendations not noted in this summary relate to hard landscape and service infrastructure design : in my experience these issues are best considered in detail in collaboration with other members of the design team, as the overall proposals develop towards the reserved matters stage.
- 9.35 As noted (6.41 above) LPGN7 '*Landscape and Development*' and the LPGN17 '*Trees and Development*' were omitted from the list at 5.4 in the WCBC Statement of Case (Ref CD63), but are in my view relevant to the assessment of the Application. LPGN17 was, however, provided by the Council with their appeal questionnaire and is included as a Core Document (Ref CD43) : I will review this first -

LPGN17 : Trees and Development (Ref CD43)

- 9.36 The purpose of the LPGN is to back up the Policy EC4 (considered at 6.37-6.41 above) and thus provides advice on the survey and protection of existing trees on development sites. Section 2 of the LPGN notes the importance of trees to the amenity of landscape and streetscene, and summarises their contribution to the quality of life including such matters as health, well-being, and wildlife habitat. As a Chartered Landscape Architect I fully support the aims of the guidance, which I believe has been followed in the submission of this application.
- 9.37 Section C on page 2 sets out the information required for applications. At Home Farm the application is for up to 365 dwellings and 300m² of retail space (PSoCG Ref CD65 at 2.14) and is clearly 'Large Scale' as per the criteria in paragraph (iii) being for five dwellings or more. With reference to the Table 1 on the LPGN7 page 2 the following items were submitted with the application -
- i) The trees and hedges were plotted on a block plan - for which, see the Illustrative Masterplan Plan 08 in Appendix C of the LVIA Ref CD10)
 - ii) The land survey was also submitted (see CD6)
 - iii) A Tree Survey to BS5837:2012 was also submitted, for which see Appendix B of the LVIA Ref CD10).
- 9.38 The information was provided in advance of the preparation of the illustrative masterplan so that the survey findings, in particular the root protection area (RPA), could be taken into account in the design proposal. To clarify the point, the RPA is noted further in LPGN17 at D9(i) on page 6, in summary calculated as an area equivalent to a circle with a radius 12 times the stem diameter, within which no disturbance of the ground should take place : this established a preliminary building line to help the Architect with the site planning, with further advice given in the Summary of Appendix B of the LVIA as to the influence of these matters on the detail design.
- 9.39 The remaining items required to comply with LPGN17 are the Arboricultural Implication Study (noted section 3C on page 6) ; the Tree Protection Plan (section 3D on page 6) ; and the Arboricultural Method Statement (section 4.3A on page 7). These all require the preparation of a firm proposal for the position of the houses, service infrastructure, roads and pavements which in the case of Home Farm would be part of the Reserved Matters stage. Consequently this information cannot be provided at the outline stage, but I note that the PSoCG (Ref CD65, page 25) includes a Condition 10 which covers these items and requires their submission and approval prior to each phase of the development. In my experience this is standard practice for outline applications.
- 9.40 I thus consider that, insofar as appropriate given the outline nature of the Application, the requirements of LPGN17 have been complied with.

LPGN7: Trees and Development (Ref TH03)

- 9.41 As previously noted this Guidance was omitted from the list included in the WCBC Statement of Case (Ref CD63, 5.4) and has not been provided by the Council with the appeal

questionnaire: however, I consider it to be an important element of the submission, and have thus included as document TH03 in the Appendix to my Evidence.

- 9.42 The Guidance seeks to clarify landscape information requirements and help applicants to have a better understanding of landscape issues ; in the case of this Llay project I emphasise that the Client and the Architect fully recognised the importance of landscape issues in the development of proposals, as evidenced by the importance of my practice to assist from the outset. I can thus emphasise that the consideration of landscape issues are an integral part of the design process, and not a 'bolt-on' consideration to justify decisions taken in isolation.
- 9.43 Following the introduction LPGN7 includes a section entitled 'General Considerations'. This draws attention to the diverse landscape character within the County Borough, and I have previously acknowledged this in my Evidence with reference to the Landscape Character SPG at 6.12 onwards. The LPGN then refers to Special Landscape Areas in the UDP - this does not apply to the Home Farm site as it is agreed that there are none applicable (reference the PSoCG CD65 at 3.2 page 7).
- 9.44 Page 2 of LPGN7 includes a checklist of 7 factors (presented as bullet points) which are noted as being helpful to assess whether the proposal is acceptable in principle. I will consider each of these with reference to where the information has been provided in the Llay submission -
- i) *Existing boundaries* - were shown in the plans submitted in Appendix C of the LVIA (Ref CD10)
 - ii) *The position of existing trees and whether they are to be retained and removed* - the position and detail of the trees were included as Appendix B in the LVIA (Ref CD10) ; the LVIA Report itself, at 5.7 notes that all these trees can be retained. The WCBC Statement of Case (Ref CD62) makes no reference to loss of trees thus I assume this point is accepted.
 - iii) *The intended uses and treatment of the external spaces* - these were presented in outline as design principles on the illustrative masterplan contained as Plan 08 in Appendix C of the LVIA (Ref CD10). The plan notes the location of play spaces, and is supported by further notes presented as a Landscape Strategy in the LVIA Report (Ref CD10) at 5.11- 5.29.
 - iv) *The location of screening factors eg buildings, trees etc within or outside the site* - these were presented on the Plans 02 - 03 of the LVIA Appendix C (Ref CD10), supporting the Plan 04 showing the zone of theoretical visibility arising from my analysis of these features
 - v) *The location of other structures* - I consider these have been shown in my response to the fourth matter, as above.
 - vi) *Any intended changes in landform* - the application is outline only, thus this is considered in principle only. Paragraph 6.5 of the LVIA (Ref CD10) notes that the provisional site layout responds to the existing landform and shows that the development can be accommodated without any interventions such as terracing or cut and fill.
 - vii) *The position and general type of planting* - these were shown in principle on the Landscape Strategy Plan 08 in Appendix C of the LVIA (Ref CD10). The plan includes the notes 1 - 9 which refer to further notes in the Landscape Strategy summarised in the LVIA Report (Ref CD10) at 5.11- 5.29.
- 9.45 From this point LPGN7 continues with guidance on more detailed aspects of landscape design, which in the case of Home Farm would be addressed at the Reserved Matters stage. I thus consider that the submissions made for the application thus follow the guidance of LPGN7.

- 9.46 To conclude my review of the planning context I note that the principles of the WLBC LPGN are shared with TAN12 'Design' (Ref CD38). The approach taken with the design of the development at Home Farm thus follows national guidance -
- i) TAN12 at page 17 includes a section entitled 'Appraising Context', summarising issues to be considered in the site appraisal and design stages. The Home Farm application includes the LVIA (Ref CD10) and the Ecological Appraisal (Ref CD21) as direct reviews of the 'landscape' context : other studies such as air quality, noise, and archaeology added to the appraisal.
 - ii) Section 4.8 of TAN12 deals specifically with character. The Home Farm application takes into account the Council's Landscape Character Assessment SPG (Ref TH01), and retains the perimeter features of the site (trees and hedgerows) to ensure that the effect of the development is mitigated.
 - iii) Section 4.11 of TAN12 refers to the Landmap character assessment, to which the submitted LVIA (Ref CD10) made reference at 2.20-2.23.
- 9.47 The illustrative masterplan is thus the product of a full appraisal of the site and its context, taking into account the WCBC planning policies and the recommendations of published guidance notes at both local and national level. In my view the result, together with the landscape strategy principles set out in the LVIA (Ref CD10) provide a comprehensive set of principles to provide an acceptable form of development at the Reserved Matters stage.

10 SUMMARY AND CONCLUSION

- 10.1 The landscape and visual appraisal of the Home Farm site was carried out in accordance with the accepted GVLIA methodology as the first step in the design process leading to the submission of the Planning Application. It is thus an integral part of the process, thus in line with policy recommendations at both national level (TAN12) and local level (WCBC's LPGN).
- 10.2 The LVIA appraisal (CD10) identified the principal features of the site ; I have re-visited the site in preparation for the Appeal and the condition since 2014 is unchanged. The appraisal lead to the following key findings. First, that the zone of visibility is limited to the immediate context, a matter agreed through the inclusion of the LVIA Plan 04 (CD10 Appendix C) in the PSoCG (Appendix 4).
- 10.3 Second, that the site landscape of pasture, hedgerows, and linear tree groups is the prevailing character north and east of Llay, defined within the Landscape Character designation (LCA8) as 900ha within the Borough and extending further into the neighbouring authority of Cheshire West. It is thus a common feature within the context.
- 10.4 Thirdly, in terms of the effect on landscape the criteria set out in section 4 (4.5) of my Evidence concludes this is of low sensitivity, and development would be a low magnitude of change when considered against the context in which it would sit.
- 10.5 Finally, in terms of the potential visual effects, there are relatively few receptors to views of the site : the more sensitive viewpoints from dwellings are limited to the houses along the west side of Gresford Road, in Old Meadow Court, and more scattered dwellings in Chapel Lane (to the north) with two further houses on the south boundary. The LVIA notes that these all benefit from a degree of natural mitigation through the maturity of the perimeter hedgerows and trees.
- 10.6 A landscape strategy has been submitted with the application. This takes as its starting point the retention of the perimeter features (hedgerows, trees) thus maintaining the character of the site within the context and the extant elements of screening : the strategy then adds additional greenspace and planting to enhance the setting. The details are the subject of

Conditions (1 and 21 in the PSoCG CD65 Section 7) and thus developed at the reserved matters stage, but it provides a robust design brief which will bring the following benefits -

- i) The distance between the existing and the new dwellings is increased, such that the 22m offset distance identified in LPNG30 is exceeded by a minimum of minimum of 49% and a maximum of 137%.
- ii) The additional planting can include trees, hedgerows, understorey shrub planting, and species-rich verges. It can be manipulated to achieve focused objectives, for example, to add to the screening effect, to frame views into wider areas of green space, and to promote habitat diversity.
- iii) The addition of public footpaths to improve the linkages between the existing village, the new village, and the adjacent countryside via the public footpath on the east side.
- iv) The greenspace can introduce play areas and greens for informal recreation, to benefit the existing residents and the new residents alike.

10.7 The Decision Notice (CD33) identifies that the proposal is contrary to the Policy PS2, and whether it thus constitutes a significant intrusion into the rural landscape ? I do not consider that it does - in landscape terms the principal features of the site edge are retained to continue their contribution to the rural setting. The Home Farm land cover of pasture is the prevailing feature in the area, identified by the Landmap classifications and extending further into the neighbouring authority. The use of a very small proportion (15.68ha) for residential development is a negligible amount

10.8 The WCBC Statement of Case (CD63) states the view that the proposal does not represent a logical extension to the existing built up area of the Llay. I have reviewed the series of historic development maps since the origin of the village in 1912, providing housing for those working at the Llay colliery then being opened up. I note the expansion of the village until 1975 took place west of Nant-y-Gaer woods, and that Gresford Road only provided access to the scattered farms and houses to the east. I conclude that Nant-y-Gaer was in fact the logical boundary to the original settlement of Llay, reinforced by its landform and trees. The colliery closed in 1966 ; subsequent development maps from 1984 to the present day show the development east of Nant-y-Gaer, developed in response to a different need, that of suburban housing.

10.9 Given this, further expansion of Llay east of Gresford Road is logical, taking advantage of an established route to support a new, coherently planned development. In this respect, it will accord with the sustainability principle of PPW8 (CD36, at 4.7.8) in that -

- i) The Home Farm site is adjoining an existing settlement
- ii) Extensive suburban development is a feature acknowledged in the landscape character assessment of the Council's Landmap SPG.
- iii) The features of the existing site and the potential for enhancement through the landscape strategy allow the development to be accommodated in terms of access, habitat and landscape conservation.

10.10 I have considered the likely visual effect of the development. I have noted that the existing context provides a degree of 'instant' mitigation through the maturity of the boundary hedgerows and trees, retained in the site planning. I have described how the landscape strategy provides perimeter greenspaces, which in addition to the benefits summarised in 10.6 above will ensure that the development can be integrated into the surrounding landscape. It will not have a detrimental effect on the countryside. There is consequently no conflict with the Policy PS2

10.11 I have examined the UDP Policy context identified by the WCBC Statement of Case, and conclude there is no conflict with this. I have also reviewed the LPGN and conclude that the

Home Farm design has followed these guidelines in producing the development proposals to the current stage.

- 10.12 I therefore conclude that the development at Home Farm will not result in any adverse effect considered to be of significance to either the character or appearance of the site and surrounding landscape setting that would make the proposal unacceptable in landscape and visual terms.