



Bryniau Farm  
Llwynmawr  
Llangollen  
LL20 7 BE

19<sup>th</sup> October 2016

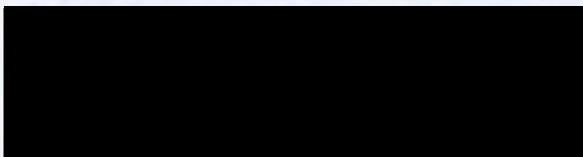
The Planning Inspectorate  
Crown Buildings  
Cathays Park  
Cardiff  
CF10 3NQ

Reference H6955/A/16/3154472  
Erection of Free range Egg Production Unit, Access Improvements and  
associated works at  
Caemor  
Llwynmawr  
Pontfadog  
Llangollen  
LL20 7BE

Dear Sir/Madam

Please find enclosed a Letter report on Landscape & Visual Assessment  
commissioned by a group of local residents to be considered as part of the  
above appeal.

Yours faithfully



( A J Pick , Miss )

Cae Mor

Appeal Reference: H6955/A/16/3154472

Erection of Free range Egg production Unit, Access Improvements and Associated Works at:

Cae Mor Llwyn Mawr

Pontfadog, Llangollen.

Wrexham.

LL20 7BE

## **Landscape and Visual Assessment LETTER REPORT**

### **1.0 Introduction**

- 1.1 My name is Julie Barr BA Dip LA CMLI and Principal of Tirlunbarr Associates - Landscape Architects and a Fully Chartered Landscape Architect with over 28 years' experience; working for Local Authority and small private practice, and as a Principal within a large multidisciplinary Consultancy until 2007, when I established my own Private Practice.
- 1.2 My experience has related to both small scale and major infrastructure developments throughout Wales and the North West and I have prepared in excess of 30 Landscape and Visual Impact Assessments including for EIA developments in sensitive landscapes, and prepared and given expert witness advice at Public Inquiry and Local Planning Hearings.
- 1.3 I am a professional member of the Landscape Institute and Landscape Institute Wales where I provide a north Wales representation.
- 1.4 I have been appointed by a Group of Local Residents to review the findings and conclusion of the Landscape and Visual Impact (LVIA) produced by Viento Environmental, which was prepared to accompany the Planning submission for the Erection of a Free Range Egg Production Unit access improvement and associated works on land at Cae Mor, Llwyn Mawr Pontfadog, Llangollen, LL20 7BE.
- 1.5 My brief is to review the site and to critically appraise the LVIA prepared for the planning application and to consider and advise on any related points for the "group" to include within the preparation of their own representation to the hearing.
- 1.6 Whilst my appointment does not extend to carrying my own LVIA I have visited the site and immediate locality in September 2016 and reviewed the submitted Appeal and Original Application documentation in order to understand the submitted scheme content and any potential effects.
- 1.7 I am very familiar with the landscape context of the area, and I have reviewed the overall content of the Planning Application Proposal in order to understand the detail of what is being proposed.

### **2.0 BACKGROUND**

The proposed site is located within a Special Landscape Area

**Special Landscape Areas Policy EC5**

*"Within Special Landscape Areas, priority will be given to the conservation and enhancement of the landscape. Development, other than for agriculture, small-scale farm-based and other*

*rural enterprises, and essential operational development by utility service providers, will be strictly controlled. Development will be required to conform to a high standard of design and landscaping, and special attention will be paid to minimising its visual impact both from nearby and distant viewpoints.*

*Within the County Borough there are a number of areas which are considered to be of particularly high landscape value. These include the upper slopes of Ruabon Mountain, the Ffrith Valley, parts of the Dee Valley, and the **Ceiriog Valley**. In addition, there are pockets of high value landscape which contribute to the setting, amenity, and character of local settlements, or views along main communication routes, and comprise attractive and sensitive environments in their own right. Examples include parkland and garden landscapes in the CADW register of Parks and Gardens of Special Historic Interest (all of which lie within special Landscape Areas), Landscapes of Historic Interest, village greens, open areas within or adjacent to built up areas, river valleys, and farmland. Development is often inappropriate in such sensitive locations and the maintenance and **enhancement of the landscape quality is particularly important**".*

- 2.1 The proposed site is within sub area 4 Ceiriog Valley of Wrexham Councils (LPA) adopted LANDMAP Special Planning Guidance Adopted in 2007 (Ref 1).

#### **Landscape sensitivity**

*"The Ceiriog Valley is sensitive to any changes which might affect its rural character and tranquillity, and it is vulnerable to pressures from nearby centres of population. It is also sensitive to changes which might take place on the surrounding uplands"*

#### **Visual character**

*"Upland pastoral valley with small scale mosaic of fields with hedgerows (some sparse or overgrown) and woods. Steep open slopes give an upland feel even at lower elevations. Constantly changing views due to zig zag shape of valley. Scattered stone-built farms reached by steep winding lanes. High quality of the landscape, the result of the sense of peace and tranquillity as well as the scenery."*

#### **The Management Aim Guidelines of this area include the following:**

- *Avoid visually intrusive development which is not in keeping with the area, particularly development on skyline*
- *Ensure new buildings and conversions of older buildings are sympathetic to local character, using local materials where possible (consider small scale working of local quarries)*

- 2.2 Additionally the site forms the north western edge of the Natural Resources Wales LANDMAP Aspect Area WRXHVS005 –Berwyn Foothills, and is adjacent to Aspect Area WRXHVS004 Ceiriog Valley Slopes and Valley Bottom – which are associated.

- 2.3 A copy of the LANDMAP Area is attached as Ref 2. And two extracts are indicated below with recommendations for management of the aspect area as follows:

| Recommendations                                    |                                                                                                                                                                                                                                                                   |
|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Define the key qualities that should be conserved: | Intimate rural agricultural landscape over diverse landform                                                                                                                                                                                                       |
| Define the key qualities that should be enhanced:  | Biodiversity within vegetation cover and boundaries where appropriate to landform/cover                                                                                                                                                                           |
| Define the key qualities that should be changed:   | Limit new or intrusive development                                                                                                                                                                                                                                |
| Define the key elements that should be conserved:  | Diverse landforms and typical Welsh valley feel                                                                                                                                                                                                                   |
| Define the key elements that should be enhanced:   | Elements associated with remote/marginal farming and hill farming emphasising Welsh valley                                                                                                                                                                        |
| Define the key elements that should be changed:    | Limit intrusive/unsympathetic development                                                                                                                                                                                                                         |
| Principal management recommendation:               | Maintain as existing, with a view to providing a greater support/promotion of traditional farming and land management techniques to improve visual appearance and biodiversity. Overall strategy should promote conservation and protection of existing landscape |

Note: references to

- *"Limiting new, intrusive development or unsympathetic development"*.
- *"Managing the landscape as existing"*

- 2.4 The Evaluation matrix for the LANDMAP Aspect area is indicated below

| Evaluation Matrix                       |                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Evaluation Criteria: Overall Evaluation | High (3 High + 1 Moderate = High)                                                                                                                                                                                                                                                                                                                                                     |
| Justification of overall evaluation     | Displays many characteristics typical of archetypal Welsh valley - but this in itself is not significantly rare enough to warrant an Outstanding evaluation on the grounds of International or National importance. Currently still maintaining its appearance as being relatively remote from urbanisation, but due to its proximity to settlement could be threatened in the future |
| Evaluation Criteria: Scenic quality     | High (Displays many traditional characteristics typical of archetypal Welsh valley and as such has a number of aesthetically pleasing and attractively composed views throughout the complex - especially towards the western end where the views are more classically picturesque.)                                                                                                  |
| Evaluation Criteria: Integrity          | Moderate (Currently still maintaining its appearance as being relatively remote from urbanisation, but due to its proximity to settlement could be threatened in the future. However currently the area is unspoilt by large scale or inharmonious development and there is little present that could be considered visually intrusive in development terms)                          |
| Evaluation Criteria: Character          | High (Attractive and varied landscape displaying many landform elements that create an intimate feel and atypical Welshness, and as such the area has a strongly defined sense of place and strong visual unity. This is further emphasised by the distinctive topography and clearly defined valley form that is key to the aspect area's delineation.)                              |
| Evaluation Criteria: Rarity             | High (Valley system and landscape character that is relatively rare within the study area but more common on a national scale and throughout North Wales. The atypical "Welshness" of the valley form and landuse is however a representative and valuable features for other visual and sensory criteria within the study area)                                                      |

Note: references to;

- *"currently the area is unspoilt by large scale or inharmonious development and there is little at present that would be considered visually intrusive in development terms."*

- 2.5 Recommendations for the Aspect Area include:

| Recommendations              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Guideline                    | Medium Term (Retain existing rural character - avoid intrusion by urban elements especially on settlement edges)<br>Immediate (Ensure new development is sympathetic to local character)<br>Long Term (Retain small scale diversity and contrasts in landscape and vegetation cover)<br>Medium Term (Introduce traditional land management techniques where practicable, improving species diversity within hedgerow boundaries)<br>Medium Term (Improve public access especially in the vicinity of settlements improving green links into surrounding countryside especially to the eastern end of the aspect area) |
| Existing management          | Generally Appropriate                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Existing management remarks: | Farming practices appear under some stress from lack of investment/support. Otherwise land management appears relatively consistent if under pressure.                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

Note references to:

- *"Retain existing rural character"*
- *"Ensure development is sympathetic to the local character"*

- *"Introducing traditional land management techniques where practicable"*
- *"Retain small scale diversity and contrast in landscape and vegetation cover"*

### 3.0 DEVELOPMENT PROPOSALS

3.1 My comprehension and assessment of the development proposals refers to the submitted drawings, which include:

- The removal or reduction in height of an existing boundary native hedge
- The creation of a new vehicular access complying with current Highways Standards
- The provision of a Wash Down Tank
- 2no. Feed silos circa 6m height unknown colour but cheapest option is zinc.
- Agricultural building 19.8m x 76m x 6m in height with a double pitched roof
- Earthworks including terracing of circa 45m width
- Hard surfacing
- Storage area for manure/other/materials
- Grazing and fencing for stock of circa 5.5 acres
- Trigger lighting
- Access track and turning circle of approximately 90m

3.2 Although details aren't known or provided it is envisaged the project may or will also contain the following either direct or indirect provision:

- Overhead Electricity supply apparatus
- Vehicular turning area of hard surfacing
- Increased movement and vehicular activity(deliveries etc)
- Gated access (circa min 5m width)
- Signage for locational or advertising purposes

3.3 It is unknown if indirect effects of the development are included within the assessment consideration as these in my view should form part of the overall project evaluation and which may include:

- Removal or localised road widening for construction and or delivery access
- Change to the vegetation pattern as a result of the storage of high pH material (manure/litter)
- Change to landscape appearance of semi improved grassland where stock densities alter natural soil pH through droppings and intensive grazing within fenced areas
- Potential loss or degradation of existing native (calcifuge) boundary vegetation through increased alkaline pH alteration.

3.4 The LVIA describes the **"main"** elements of the proposal and it considered that direct and indirect content of the project listed above should have been included as part of the proposals for inclusion within the overall Landscape and Visual Assessment reporting.

#### **4.0 Comments upon the LVIA**

4.1 I have not been appointed to undertake a separate LVIA due to funding and time limitations of the group, however I have reviewed the proposals on site together with information available on the Planning Portal.

4.2 Likewise I am not aware of the brief provided to the Landscape Architect for the detailed scheme LVIA, I have however made observations regarding the submitted January 2016 and Appendices dated June 2016, as follows:

1. The LVIA is thorough in its content, however I have concerns regarding the assessment of both landscape and visual effects.
2. A 3km radius is stated for the LVIA extent and I am unclear as to how this has been established - by fieldwork or by agreement with the LPA; Given the undulating and varied topography and the scale of the proposal this should be reviewed with particular regard to identifying potential receptors of up to 4km distant including the Ceiriog Trail which contains lengthy sections running directly towards the proposed site where a primary visual focus would include the site.
3. Elevated vantage points of the same level AOD of the site will be particularly affected where views across the valley on the same topographical level will be more apparent than views from lower elevations looking up towards the site through many layers of vegetation.
4. I consider the loss of the hedgerow (or lowered height) to facilitate a compliant site entrance to be a major adverse effect given the intact hedgerows flanking the road and field boundaries predominant within the area. This together with the visual change in landscape fabric by stock grazing, shelters from raptors and pasture appearance alteration as a result of an adverse pH will be discernible and contrast with the surrounding traditional and intact landscape.
5. My opinion accords with the LPA Officer with regard to the scale of the proposed structure on site, and its location. There are no isolated new farm buildings of this scale in the area or within the predicted ZVI of the appeal site. Traditionally in this rural landscape any new agricultural buildings are associated with existing farms which have evolved over time from historic winter 'hendres' pastures, according to need and sequential modernisation of agricultural practices.
6. The introduction of a building of this scale in a largely intricate intact and small scale landscape will be discordant and at odds with both the authors and NRW LANDMAP identified landscape character; and this will have the potential effect to distort the scale of the existing fields which surround the site and within which the development is proposed.
7. The addition of a potential overhead electrical supply, and the increased movement and noise will be a noticeable feature in this otherwise very tranquil and static landscape, particularly in winter months when the hedges are lower along publicly accessible routes and where deciduous vegetation provides a greater opportunity for the development to be viewed.
8. The scale of the proposed building, and particularly its predictable highway compliant scale of access, and associated ancillary apparatus such as the feed hoppers, storage and bunded areas set in an isolated location devoid of historical connection will appear industrial rather than agricultural and this will be clearly evident along the circa 86m

affected length of hedgerow removal (or permanent height reduction). Industrial development is not present in the surrounding area.

9. I am unsure if other locations outside of the Ceiriog Valley and SLA area have been considered as allocation for the development which may be more appropriate for the industrial appearance and scale as there appears to be limited agricultural reasoning or association for its siting in this location.
10. The steep topography of the proposed site will result in the need for considerable earthworks to accommodate the proposed shed, and although a detailed topographical survey does not appear to be available - I consider the earthworks and drainage have the potential to affect the long term viability existing belts of native vegetation identified for screening purposes, thereby affecting further landscape fabric than identified within the LVIA. For example in the absence of a topographical datum survey OS data shows the site location from 290m AOD rising to 330m AOD over a distance of circa 100m or a typical gradient of 1 in 2.5 which would necessitate considerable cut and fill operations to achieve this and the access road to the shed and wider. It is unfortunate that more detail is not available for this important aspect.
11. There is no guarantee that the screening provided at present by existing hedgerow belts will be maintained at their present height and form; indeed any landowner or third party could reduce or remove vegetation, and as a result the proposed development would immediately lose the screening it relies on, particularly if there was a change in ownership outside the control of the appeal site.
12. With regard to the retention of hedgerows and site vegetation, previous experience of similar schemes maintain 2-3m wide swathes of open land around perimeter fences to facilitate stock pest control measures, and this would result in the loss of vegetation cited for screening and landscape integration purposes.
13. With regard to the LVIA - the Fieldwork is stated as being undertaken in winter months but many of the photomontages are illustrated by summer images, when deciduous vegetation provides a more effective screen, and they do not include the full proposed scheme content - merely the proposed building; excluding the access, access track, silos, fencing and any stock accommodation or cover.
14. The report confirms within Para 19 *generally good levels of vegetation* (not excellent or effective) meaning therefore that *"the proposed development would be at least partially screened"* and not fully as the report scoring indicates.
15. Para 20 suggests that within 0.5km of the site there are only residents as highly sensitive receptors whereas the many tourists using the B4579 and footpaths within 0.5km are also highly sensitive and not moderate as the report suggests and whereby the development would be immediately apparent in close proximity and as a distinctive contrast the surrounding intact landscape.
16. Para 28 suggests that the mitigation planting would benefit landscape fabric whereas I would consider its inclusion to be at odds with the overall landscape natural pattern which is characterised by small fields and historic hedgerows and with potential removal for fence maintenance this would be difficult to attain.
17. Para 36. I agree that the proposed building would constitute a significant adverse change to the character of the site landscape and wider afield.
18. Para 36. In my view this degree of change for a Poultry Operation would not be acceptable in landscape terms.
19. Para 40 I would agree that the development has potential to be of medium/high sensitivity with regard to the sensitivity of the Landscape Character Area as described

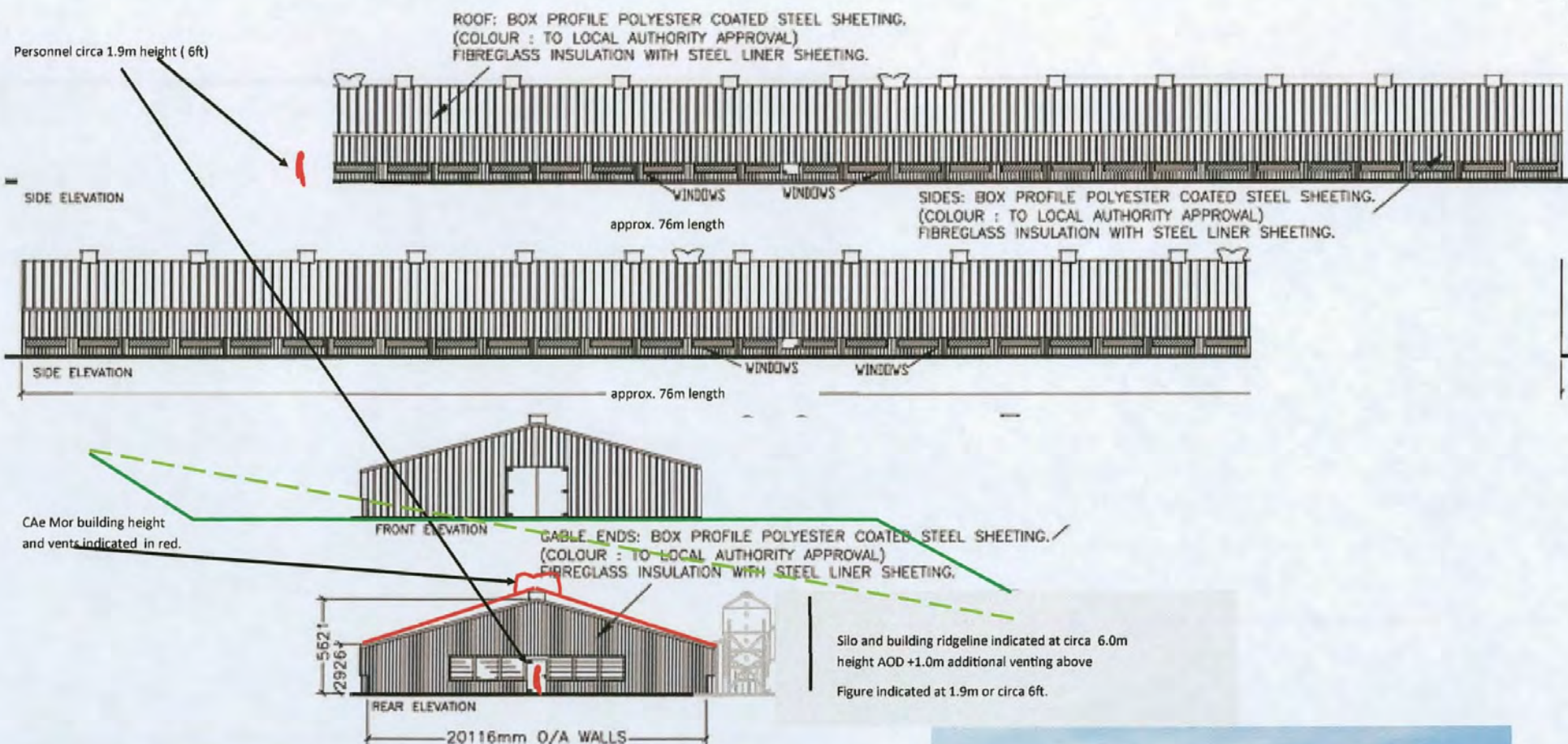
but with the addition of the changes I consider are not described or taken account of – the sensitivity is increased to high and with particular regard to the proposed access being compliant with modern Highways standards, materials and resultant scale.

20. Para 41 refers to existing hedge heights (stated as 0.5-2.0m and then over 3m height) providing a screen and containing potential visibility; the loss of hedging and its realignment for the contrasting modern and permanent access which could result in a permanent lower length (usually less than 0.9m) which in itself would contribute to a further adverse impact increasing the sites sensitivity.
21. Para 44 notes visibility of the turning circle would be *reduced* not screened – hence a residual visual impact would occur further increased by the loss or reduction in hedgerow height. The Appendum para 12 infers that the loss of the existing hedgerow would be outweighed by the beneficial impacts of the proposed landscaping scheme which suggests *the planting of native trees along part of the route of the access track and turning circle* which would disrupt the overall natural landscape pattern further. Again these are not indicated on the accompanying photo montages.
22. I consider with regard to para 55 – the visual impact upon the Ceiriog trail to be of higher magnitude than stated and as moderate as there are no similar structures of that scale in the view from this location at this elevation and as a singular new structure in the landscape dis associated with other built development.
23. Para 58. assumes all public highway receptors are of medium sensitivity however many receptors using the immediate road network are tourists-hence I believe this should be increased as they would be of high sensitivity which is relevant given the areas promotion as a tourism destination, and where receptor numbers could be proportionately higher than footpaths for example.
24. Para 1 of the Appendum refer to users of the B4579 as motorists walkers cyclists and horse riders – I would suggest these may include tourists of higher sensitivity than moderate and this is reflected in the June 2016 Appendum within Table 1 but only after prompting by the LPA.
25. There seems to be no acknowledgement regarding the loss of tranquillity and increased movement in any of the descriptive text or reflected within the overall scoring of magnitude given the LCA highlighting this as an important characteristic of the area.
26. The Photomontages produced demonstrate clearly the lack of buildings of the same scale as that proposed and do not illustrate the filtered effect alluded to as even deciduous leafless trees appear to show a total screen benefit which in reality never occurs.
27. The applicants Trysor Archaeological report for the appeal site alludes to the proposed building being centrally located within the overall holding, and I am therefore unsure if it is intended that future poultry grazing and access will extend into all land within the applicants ownership.
28. Likewise the Archaeological reporting seems to promote the idea of visual association of the poultry farm building to Cae Mor Uchaf which does not occur in the field - as Cae Mor Uchaf is separated by the B4579 and visually by existing vegetation and hence there is no perceived visual connection or inter-visibility. Interestingly all other agricultural buildings in the area are located immediately adjacent to or within existing farmsteads and where larger scale buildings are present – these tend to occur at lower levels of the valley floor for practical reasons, and without exception all are of a smaller scale than the building proposed.

29. The LVIA is detailed otherwise, however overall I consider that the LPA are correct in rejecting the application on landscape and visual grounds as they have stated. I cannot concur that the proposed development is of small scale or farm based which is contrary to Policy EC5 as I consider it is likely to be more visible than predicted and does not fully cover the anticipated content and impacts of the overall scheme hence it would adversely affect the SLA designation.

Julie Barr BA Dip LA CMLI

17.10.16



Illustrative comparison scale of proposed Poultry Building and likely appearance