



KRONOSPAN, CHIRK

**PLANNING APPLICATION FOR THE ERECTION OF 2
NO. RAW MATERIAL SILOS, AN EXTENSION TO THE
EXISTING CHIP PREPARATION BUILDING, THE
ERECTION OF 3 NO. SILOS ASSOCIATED WITH THE
CHIP PREPARATION BUILDING, AND ASSOCIATED
WORKS**

PLANNING STATEMENT

June 2022

The logo for axis, consisting of the word 'axis' in a white, lowercase, sans-serif font, centered within a dark blue square.

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Planning Application Drawings and Figures

Drawing / Figure Number	Drawing Title
3046-01-02	Statutory Plan
7000_706 C	Chip Prep Building Extension and Silos
9000_88 C	Raw Material Storage Silos
Figure 1	Annotated Plan

Appendices

Appendix A – Landscape and Visual Impact Assessment

Appendix B – Cultural Heritage Assessment

Appendix C – Air Quality Technical Note

Appendix D – Noise Impact Assessment

FOREWORD

This document is the Planning Statement for the erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works (the Proposed Development) in the existing Kronospan Facility. The Proposed Development is on the site of an existing area of hardstanding.

Kronospan is an important local and national business. In 2020, it was the 9th largest manufacturing business in Wales and provides direct employment for over 600 people of which 90% live within 10 miles of the site.

Ensuring that the Kronospan site in Chirk remains a competitive and sustainable business is important to the local and national economy. The Proposed Development forms part of an ongoing development programme which started with Vision 2020 to modernise, future proof and improve the site, and which is continued with Vision 2025.

Vision 2025 is the next phase of improvements and includes significant investment in the future. There will be a focus on improving site access, storage capacity and material handling to meet customer's needs more efficiently. This will further align Kronospan's strategy with the UN Sustainable Development Goals and the UK Government's net-zero strategy, by investing in ways to make the plant more sustainable through the economic, social and governance pillars of the sustainability model.

The existing wood chip preparation building processes Recycled Timber (RCT) wood for use in the manufacture of particleboard. RCT would be transferred to the extended chip preparation building from the two new large storage silos via a series of enclosed overhead conveyers. This would improve the quality of the service through automating the loading of the product into the chip preparation building and would reduce the potential for dust by internalising the storing of the materials on site.

Within the chip preparation building, the RCT would be further processed to separate non-wood materials from the useable product. This will generate a cleaner recycled wood timber for production use. The RCT material is then processed / flacked into wood chip material inside the chip preparation building. Currently, the chip material produced on site is part recycled material (RCT) and part virgin wood material. The extension to the existing chip preparation building would increase the production of

RCT material to be used in replace of the virgin wood material, which would increase the sustainability of the finished particleboard product. The extension to the wood chip preparation building would also streamline the production process and increase its efficiency. Furthermore, the continued internalisation of the processes undertaken inside the wood chip preparation building would not add to any noise emissions from the Site. This building extension would be accompanied by the proposed three small silos to store the wood chip material produced.

The 3 existing air filters clean the air within the chip preparation building by removing finer wood particles / dust produced as a by-product of the processing. These air filters would need to be relocated 10m to the north of the proposed chip preparation building extension, and an additional air filter is proposed to accompany the existing relocated air filters.

Overall, the Proposed Development is being undertaken to ensure the long-term economic viability of the manufacturing facility.

In addition to this Planning Statement and its associated technical reports, the planning submission comprises the requisite planning application form and certificates, Design and Access Statement, and planning drawings.

1.0 INTRODUCTION AND SCOPE OF THE APPLICATION

1.1 Introduction and Background

- 1.1.1 This Planning Statement has been prepared in support of a planning application made by Kronospan Limited (hereafter referred to as 'Kronospan') for the erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works, which is described in Section 2 (hereafter referred to as the 'Proposed Development').
- 1.1.2 The Proposed Development is linked to the production of wood chip material from Recycled Timber (RCT). The proposed two raw material storage silos would be to the east of the existing wood chip preparation building and to the west of the RCT Grading & Storage Facility (approved and constructed under planning permission P/2016/0219). These two large storage silos would have a storage volume of 14,065m³ each and would store the RCT material ready to be processed into wood chip.
- 1.1.3 The existing wood chip preparation building was approved and constructed under planning permission ref P/2017/0416 and has been operating for c. 4 years processing RCT material and virgin wood material into wood chip for particleboard. This building is proposed to be extended (by 250sq.m) to the north and would be accompanied by three new small storage silos (volume of 597m³ each) to the north of the proposed extension to collect the processed chip material.
- 1.1.4 The three existing air vents for the chip preparation building are proposed to be relocated to accommodate the proposed extension, and a further air vent is proposed.
- 1.1.5 The Proposed Development would be on existing hardstanding within the Kronospan Facility, which is on the industrial site that forms part of Maesgwyn Farm off Holyhead Road, Chirk, Wrexham (hereafter referred to as 'the Site'). The location of the Proposed Development is shown on drawing Figure 1.
- 1.1.6 Kronospan manufactures and distributes wood-based panels and is a leading manufacturer of products including Particleboard (PB), Medium Density Fibreboard (MDF), laminate flooring, and orientated strand board (OSB).

- 1.1.7 It is Kronospan's intention to ensure that the Chirk manufacturing site remains a world leading production site. Several projects have been delivered as part of the Kronospan Vision 2020 investment and development programme, and they allow Kronospan to deliver continued environmental improvements at the site. Future developments are intended to consolidate this and make further improvements to ensure the business remains sustainable at the site.
- 1.1.8 The Proposed Development follows a development programme to deliver environmental improvements at the site which are intended to ensure the long-term economic viability of the manufacturing facility. The development programme has included:
- Logyard silos and Recycled Timber (RCT) offloading and grading facilities;
 - Melamine facing press hall / building;
 - Wood Chip Preparation Building with a WESP Chip Dryer;
 - Log Delivery and Transfer System and Building to House a Replacement Wood Chipping and Flaking System;
 - Raw Board Storage;
 - Oriented Strand Board (OSB) Facility;
 - New Warehouse building to north eastern part of the Kronospan Facility;
 - Covered Loading Yard (planning application is pending determination by the LPA); and,
 - Engineering Store with dedicated apprenticeship workshop (planning application is pending validation by the LPA).
- 1.1.9 The locations of the five most recent proposals are shown on Figure 1. The last three have yet to be implemented.
- 1.1.10 The Proposed Development would ultimately enhance the manufacturing facility's capability and improve the long term sustainability of the business at the Chirk site.
- 1.1.11 Through the continued internalisation of the wood chip preparation process achieved through an extension to this building, there would be a reduction in the amount of dust and noise emitted from the site. The process of producing wood chip material from the RCT material would be more streamlined through

the extension to the wood chip preparation building, which would enhance the sustainable credentials of the Facility.

1.2 Scope of the Planning Application

1.2.1 The planning application comprises the following main elements:

- Planning Application Form and Certificates
- Application Validation Statement
- Design and Access Statement
- Pre Application Consultation Report
- Planning Statement and supporting studies comprising
 - Landscape and Visual Impact Assessment
 - Noise Impact Assessment
 - Air Quality Assessment Technical Note
 - Historic Environment Desk Based Assessment
- Planning Application Drawings.

1.2.2 This Planning Statement is divided into seven main sections following on from this introduction.

- Section 2.0 provides a description of the Proposed Development and its construction.
- Section 3.0 describes the need and benefits of the scheme.
- Section 4.0 summarises the relevant planning history associated with the Proposed Development and the Kronospan manufacturing site.
- Section 5.0 provides a description of the potential environmental effects of the Proposed Development.
- Section 6.0 provides a summary of potential cumulative effects with other schemes currently proposed by Kronospan.
- Section 7.0 provides a detailed appraisal of the planning policy context against which this application should be determined and assesses the extent to which the development accords with that context.
- Section 8.0 provides the conclusions to this statement.

1.3 Environmental Impact Assessment Screening

- 1.3.1 The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 prescribe the types of development for which EIA is mandatory (Schedule 1 development) and others which may require an assessment if they have the potential to give rise to significant environmental impacts (Schedule 2 development).
- 1.3.2 The Proposed Development falls within the description at paragraph 8(a) in column 1 of the table in Schedule 2 to the Regulations (i.e. Industrial plants for the production of paper and board). The Proposed Development exceeds the applicable threshold in column 2 of that table (new floorspace exceeding 1,000 square metres). As such it is necessary to consider whether the Proposed Development is likely to give rise to significant environmental effects.
- 1.3.3 A number of assessments have been conducted in support of this application, focusing on the elements of the Proposed Development considered most likely to result in adverse environmental effects i.e. landscape, visual, heritage, air quality and noise. The assessments demonstrate that there would be no significant environmental effects from the Proposed Development, either alone or in combination with the existing and other proposed developments at the manufacturing facility. As such the Proposed Development is not considered to represent EIA development and therefore this planning application does not need to be accompanied by an Environmental Statement.

1.4 The Site and its Context

- 1.4.1 The Proposed Development is within the existing Kronospan Facility, which is on land adjacent to Holyhead Road (the B5070).
- 1.4.2 The Proposed Development would be at the western extent of the existing Kronospan Facility and would be sited where existing hardstanding, which is used as open storage.
- 1.4.3 A planning application was recently submitted to WCBC for a covered loading yard on the site of the existing main reception building and external hardstanding. The covered loading yard application is pending determination

by WCBC, and would provide a covered area for lorries to load and unload finished good products on site.

- 1.4.4 A further planning application for proposed Engineering Stores, which includes a dedicated apprenticeship workshop, is being updated following the statutory public consultation process, and will be submitted to WCBC shortly.
- 1.4.5 The entirety of the Kronospan Facility covers an area of circa 40ha, with circa 14ha of this developed with industrial buildings and plant. Figure 1 shows the layout of the Kronospan Facility. Several industrial process facilities are in the western half which are used to process, sort and dry the raw wood materials used in the manufacture of MDF / PB. These include several tall structures, including stacks, that emit clean process emissions to the atmosphere. The tallest structure within the Facility is the combined heat and power (CHP) biomass plant stack which is 70m in height.
- 1.4.6 Several process buildings are in the northern half of the Facility including: a sawmill, formalin plant and the secondary product manufacturing facility (*Kronoplus*) which produces laminate flooring and worktops.
- 1.4.7 Kronospan has recently obtained planning permission for a new warehouse building (application reference: P/2021/0725, granted on 13 April 2022), in the north-east of the manufacturing site, which will deliver 15,029 sq.m. of floorspace (GEA). This planning permission also includes a new sprinkler tank between the northern extent of *Kronoplus* and the manufacturing site's northern boundary.
- 1.4.8 The western perimeter of the Kronospan Facility is formed by the Shrewsbury to Chester railway. Improved railway siding facilities have been constructed within the site to enable an increased volume of timber to be imported by rail. The Llangollen Canal is to the west of the railway line, circa 30m from the boundary of the site at its closest point. The canal is designated as the Pontcysyllte Aqueduct and Canal World Heritage Site and as a Scheduled Monument. Water is abstracted from the canal for use in the manufacturing process. The eastern perimeter of the manufacturing site is formed by Holyhead Road (B5070). An earth bund, planted with trees, has been developed along the eastern perimeter of the facility to reduce the visibility of Kronospan operations from neighbouring properties on Holyhead Road.

- 1.4.9 A sewerage pumping station and one property, owned by Kronospan, are to the immediate north of the site. To the immediate south of the Kronospan Facility is the Cadbury's (Mondelez) factory, the Chirk AAA sports ground and the Chirk recreational ground.
- 1.4.10 Surface water for most of the manufacturing site currently drains to two lagoons on the northern boundary of the manufacturing facility, each of 2,033sqm in volume. A third lagoon was constructed to take surface water from the log yard.
- 1.4.11 The main residential area of Chirk is to the east of the manufacturing site with residential properties lining the majority of the eastern side of Holyhead Road. Chirk town centre is approximately 500m to the south and south east of the site and parts of the town centre are designated as Chirk Conservation Area.
- 1.4.12 The wider area beyond the urban settlement of Chirk is dominated by agricultural fields and woodland. Chirk Castle (Grade 1 listed) and its grounds (Registered Park and Garden) are approximately 500m to the west of the manufacturing site, beyond the canal. The Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) also lie to the west of the site, the closest boundary of the AONB runs concurrent with the grounds of Chirk Castle.

Access

- 1.4.13 The Proposed Development would not result in any change to the existing site access arrangements.
- 1.4.14 The main site entrance is a T-junction with Holyhead Road (B5070) which runs in a north south direction to the east of the site. The B5070 meets the A5 approximately 1.5km to the north of the site via a roundabout junction, known as Whitehurst Roundabout. Approximately 1km to the east of this roundabout the A5 forms a junction with the A483. The A483/A5 provide links north to Chester, west to Llangollen and south to Shrewsbury. To the south of the manufacturing site, access via the B5070 leads to the A5 via Chirk town centre, this route is restricted to non-HGV traffic (Heavy Goods Vehicle).
- 1.4.15 The existing railhead and sidings within the site are used to import timber for the manufacturing process as well as import via HGV.

1.5 The Applicant

- 1.5.1 The Applicant is Kronospan Limited. The company has existed for over 120 years and has operations in over 22 countries. It is the world's leading manufacturer of wood-based panels using advanced technology and has pioneered many of the industry's key advances. The products produced have a wide application across the flooring, furniture, and refurbishment industries.
- 1.5.2 Kronospan is the UK's leading manufacturer of high-quality wood-based panels and associated products and has been operating in the UK since 1970, and the operation in Chirk was the first outside of Austria. The primary products manufactured by Kronospan at the Chirk site are PB and MDF, from which a number of secondary products are produced such as laminate flooring, worktops and melamine faced boards.
- 1.5.3 The Kronospan manufacturing facility is a major local employer within WCBC with the site at Chirk employing over 600 staff. It is estimated that the facility also provides indirect employment to 6,000 people in industries relating to the manufacturing and supply chains associated with the operations at the site.

1.6 Pre-Application Consultation

Wrexham County Borough Council

- 1.6.1 Formal pre-application advice was obtained from WCBC on 7th January 2022, regarding the proposed two large storage silos, who responded as follows:

'The silos would be located within the settlement limit and as such would accord with policy E4 subject to also complying with policy GDP1. The silos would be situated adjacent to but taller than existing silos. Their impact upon the wider landscape surrounding the site as well as on the WHS and AONB would need to be considered via a Landscape and Visual Impact Assessment. Nevertheless on the basis of the information before me, their location within the site and their overall size are such that they would be viewed in context of the existing Kronospan site and the buildings and other structures within it. I therefore consider it unlikely that the proposals would be considered as harmful to the landscape surrounding Chirk, the setting of the WHS or views from or the setting of the AONB.'

- 1.6.2 It should be noted that the proposed extension to the existing chip preparation building was not confirmed at the time of the pre-application consultation. However, its inclusion in the Proposed Development is not expected to give rise to any additional issues set out in the advice received from WCBC on 7th January 2022.
- 1.6.3 A Landscape and Visual Impact Assessment has been undertaken to understand if the Proposed Development would result in any significant impacts. Details of this assessment are found at section 5.2 of this document and at Appendix A.
- 1.6.4 The form and content of this application was then confirmed through further correspondence with WCBC.

Community Consultation

- 1.6.5 The Town and Country Planning (Development Management Procedure) (Wales) Amendment Order 2016 (DMPO 2016), requires the Applicant to consult the public and statutory consultees prior to submitting a planning application for major development.
- 1.6.6 The purpose of this consultation is to provide an opportunity for statutory consultees and the public to review development proposals and to raise any issues, or areas of concern that the developer may need to address before submitting an application.
- 1.6.7 The consultation undertaken by the applicant and the feedback received will be described in the Pre-Application Consultation (PAC) Report which will be produced after the consultation, and submitted as part of the future planning application. This section of the Planning Statement briefly outlines the consultation that is being undertaken.
- 1.6.8 Community and Specialist consultees have been provided notice in writing of the proposed application in accordance with Article 2D of the DMPO 2016. Community consultees have been provided details of where the draft application will be available to view and specialist consultees have been provided with electronic copies of the draft application. Notice has been provided to the Neighbour consultee and 2 site notices have been posted at

locations near the site which have been used by WCBC to post notices of planning applications in the area.

- 1.6.9 The information required to be made available by Article 2C(b)(i-v) has been deposited in the form of a draft planning application will be made available at Chirk Town Council (Parish Hall House, Holyhead Road, Chirk, Wrexham LL14 5NA) and at the Reception of Kronospan (Holyhead Rd, Chirk, LL14 5NT) and is available for public viewing during regular office hours from 8:30am to 4.30pm on **30th June 2022 until 28th July 2022**. A record of visitors will be taken at reception.
- 1.6.10 Throughout the consultation period the documents will also be available at <https://www.chirk-kronospan.info> and <https://www.axisped.co.uk/>.
- 1.6.11 Please note that appropriate precautions will be in place to accord with Covid-19 regulations.

2.0 THE PROPOSED DEVELOPMENT

2.1 Introduction

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

2.2 Layout and Design of the Proposed Development

2.2.1 The Proposed Development would be sited on an area of existing hardstanding currently used as open storage.

2.2.2 The proposed two raw material storage silos general arrangement plan, floor plan, elevations and sections are shown on drawing 9000_88 Rev C. The proposed extension to the chip preparation building (and associated 3no. silos and air ventilation units) floor plan, elevations and sections are shown on drawing 7000_706 Rev B.

2.2.3 The Application Site is bound to the north, east and south by the existing Kronospan processing buildings within the Facility, and the Shrewsbury to Chester railway line and railway sidings to the west.

2.2.4 The chip preparation building is connected to the surrounding processing buildings which combine to make the chip material to process into particle board. The extension to the chip preparation building would create an additional 250sqm of floorspace. The extension to the chip preparation building has been designed to match the existing building's height, width and materials. The walls would be constructed of galvanised steel sheeting in a light grey colour (RAL 7035 – light grey) to match the existing building.

2.2.5 The proposed chip preparation building's three chip storage silos would be to the north of the chip preparation building and they would each store a volume of 597sqm each. These silos match the existing four silos found to the south of the chip preparation building.

2.2.6 Three existing air vents are proposed to be relocated to the north of the chip preparation building, and an additional air vent is proposed to accompany them.

2.2.7 To the east of the three new chip silos and four air vents is where the proposed two large storage silos are proposed. Each silo would be able to store 14,065m³ of raw material, and they would be positioned on a foundation and bucket elevator of 1,466sqm. The silos would be constructed of concrete with a flat roof.

2.2.8 The proposed large storage silos would be connected to the chip preparation building extension via new internalised conveyors to speed up the chip preparation process.

2.3 Proposed Site Operations

2.3.1 The Proposed Development would speed up the chip preparation and manufacturing process by:

- Increasing the size of the existing chip preparation building;
- Increasing the amount of raw material stored on site; and
- Increasing the amount of chip material to be stored on site.

2.3.2 The existing uncovered / exposed raw materials which are stored on the site would be internalised within the proposed large storage silos which would keep dust to a minimum.

2.3.3 There would be no increase to the existing number of HGVs delivering material to the Site as a result of the Proposed Development. There would be the same amount of material turned into chip material, but the existing virgin wood material used would be replaced with RCT.

2.4 Construction

2.4.1 Initially the Application Site would be cleared of on-site stored material.

2.4.2 The extension to the wood chip preparation building would consist of a steel portal frame and its cladding would be double skin with 100mm mineral insulation and inner perforated liner, in a light grey colour (RAL 7035 – light grey) to match the existing building.

The proposed two large storage silos would be constructed of concrete onsite.

3.0 NEED AND BENEFITS OF THE SCHEME

- 3.1.1 Kronospan is a leading producer of wood-based panels and has operated from Chirk since the 1970's. The site manufactures wood-based panels and other wood products.
- 3.1.2 The manufacturing site is ideally located for the production of wood-based board due to the presence of the railway head within the facility which is connected to the Chester to Shrewsbury rail line. The railway head enables the delivery of round wood (small logs) to the manufacturing site via rail and therefore reduces the reliance of the facility on HGVs for the delivery of raw material.
- 3.1.3 The Proposed Development is part of an ongoing development programme to deliver improvements at the site, improve the efficiency of the operations and to ensure the long-term economic viability of the manufacturing facility.
- 3.1.4 The recent developments at the Site (which are listed in Section 4.0 below) responded to a greater demand for products and the nature of customer demand has changed, which has made responding to customer needs at short notice more important. The facility can now offer a greater range of products than previously, and hence needs a more efficient loading practice on the Site itself, to ensure the product reaches Kronospan's customers efficiently.
- 3.1.5 The use of recycled materials in the manufacture of wood products is core to the Kronospan business model. The Recycled Wood Timber (RCT) is collected from household wood waste, recycling depots, or from by-products from the sawmill industry, that would otherwise go to landfill. The proposed extension to the wood chip preparation building would allow for more RCT material to be processed into chip material, replacing the virgin wood material used in the current manufacturing process.
- 3.1.6 This would be a key benefit as it would increase the amount of RCT material used in the manufacturing of particleboard, which in turn supports Kronospan's circular economy goals by increasing the use of recycled timber in finished products, displacing the use of virgin timber in products, and increasing the sustainability of the finished products.

- 3.1.7 The RCT processed at the Facility would already have been subject to a screening process undertaken within the RCT delivery system and grading plant (permission ref. P/2016/0219). The graded RCT raw materials is currently stored on the logyard in the wet chip storage silos (permission ref. P/2016/0219).
- 3.1.8 The proposed two large storage silos would double the internalised storage amount of RCT material on site (replacing the use of virgin wood), ready to be manufactured into chip. Increasing the capacity of the Facility to store wood products inside silos would also reduce the energy consumption and associated carbon emission from our drying process, supporting our carbon reduction targets.
- 3.1.9 RCT would be transferred to the extended chip preparation building from the two large storage silos via a series of enclosed overhead conveyers. This would improve the quality of the service through automating the loading of the product into the chip preparation building.
- 3.1.10 A key benefit is the expanding of the chip preparation building to enhance the process of the sifting, washing, drying, and flaking of RCT wood materials into chip, ready to be manufactured into wood products on site. Streamlining this process would further drive the sustainability goals for the Kronospan business which puts using recycled materials at its forefront.

3.2 Environmental Benefits

- 3.2.1 Over several years Kronospan has implemented projects aimed at further improving environmental conditions at the manufacturing site. The effects of the ongoing improvement projects in terms of landscape, visual, heritage, air quality, noise and transport have been assessed within the various applications submitted by Kronospan over the past few years.
- 3.2.2 The specific impacts of the Proposed Development are assessed within the accompanying documents. In terms of noise, the noise generated within the proposed extension to the existing chip preparation building and the additional air ventilation unit would be minor and would be considered as part of the existing noise generated from the site and surrounding structures. The Proposed Development is not expected to generate any unusual noise characteristics or contribute to general background noise 'creep'.

3.2.3 The location of the Proposed Development within the Kronospan Facility is on an area of existing hardstanding, which would be optimised for greater use. No trees or landscaping would need to be removed from the Site to make way for the construction or operation of the Proposed Development.

4.0 PLANNING HISTORY

4.1 Introduction

4.1.1 Prior to the 1970s, the site was greenfield agricultural land and included a farmhouse. The farmhouse still forms part of the offices of Kronospan. The site at Chirk was chosen because of its central location between its main customer base and its plentiful supply of raw materials.

4.1.2 The construction of the first factory building commenced in 1971 and the company began operating in 1973. In the late 1980s, the company bought the factory next door and this has since been extended to provide the base for the company's *Kronoplus* operation, which produces laminate flooring and worktops.

4.1.3 Over the past 6 years Kronospan has started a modernisation and improvement programme which has involved the development of a series of facilities intended to deliver efficiency and environmental improvements to the site and neighbouring residential areas. Table 4.1 below summaries the planning history at the site since 2012.

Table 4.1 Relevant key developments over the last 10 years

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

Application Ref. No.	Proposal	Decision
P/2014/0215	2.5m diameter by 7m high extension to existing 15m high abatement stack.	Approved 2 June 2014
P/2015/0728	Erection of building to contain three gas engines and three steam boilers, erection of electrical substation building, oil tank compound, a duct from the press abatement system to carry process emissions to the SEKA (WESP) stack and associated infrastructure to support existing operations.	Approved - 4 Jan 2016
P/2016/0219	Construction and Operation of a Recycled Fibre (RCF) Reception Facility, Grading Plant, Storage Silos and Other Associated Infrastructure (referred to as the log yard RCF project).	Approved – 3 May 2016
P/2016/0336	Extension of a building to house a new melamine facing (MF) press following the demolition / relocation of the existing MF department's ventilation system, hydraulic oil and diesel storage tanks, a vehicle filling station, garage service building and other associated infrastructure.	Refused – 5 September 2016 Granted at Appeal – 4 May 2017 (Reference APP/H6955/A/16/3165368)
P/2016/0534	Proposed building extension to store medium density fibreboard (MDF) and chipboard.	Refused – 05 September 2016
P/2017/0416	Replacement of existing wood chip preparation facility and development of a new wood chip dryer and associated equipment.	Approved – 31 July 2017
P/2017/0700	Development of a raw board store	Refused – 6 November 2017 Granted on Appeal – 22 May 2018 (Reference APP/H6955/A/18/3193142)
P/2017/0699	Development of a log delivery and transfer system and buildings to house a replacement wood chipping and flaking system and demolition of	Granted – 1 May 2018

Application Ref. No.	Proposal	Decision
	existing debarking and chipping facilities.	
P/2018/0551	Planning Application for the development of an orientated strand board production facility	Granted on Appeal (against non-determination) – 9 October 2019 (Reference: APP/H6955/A/19/3227571)
P/2019/0505	Development of a building containing 2 no. gas engines each with a maximum electricity generating capacity of 9.73 Mw, 2 no. steam boilers, roof mounted coolers, walkway between an adjacent building and the proposed building, exhaust gas offtake pipe	Granted – 2 March 2020
P/2021/0725	Development of a warehouse and ancillary works	Granted – 13 April 2022
P/2022/0336	Demolition of reception building and erection of covered loading yard, reception building and associated fencing and ancillary works	Validated on 8 April 2022 - pending determination

4.1.4 In conclusion, the planning history identifies that:

- The site has a long history of planning consents and applications for large industrial development.
- There have been several planning applications relating to development such as the biomass plant, extensions to existing buildings, gas engines, temporary stacks, new silos, fencing and signage.
- The planning consents include permissions for tall stacks, new buildings and wood processing plant.
- Several applications have received planning permission for projects included in the Kronospan Vision 2020 strategy.

5.0 ENVIRONMENTAL EFFECTS

5.1 Introduction

5.1.1 The Proposed Development would be surrounded by the existing manufacturing and processing buildings within the Kronospan Facility on land which is currently in use as an external storage area / hardstanding. The site is part of the existing built area of the Kronospan Facility.

5.1.2 The following sections summarise the findings of the detailed environmental assessments that are appended to this Planning Statement.

5.2 Landscape and Visual (including Heritage)

5.2.1 Appendix A contains a Landscape and Visual Impact Assessment (LVIA) which also includes an appraisal of the Proposed Development in respect of heritage. The assessment was undertaken by a Chartered Member of the Landscape Institute (CMLI). The LVIA follows best practice guidance set out in 'Guidelines for Landscape and Visual Impact Assessment' (3rd edition 2013, Landscape Institute and Institute of Environmental Management and Assessment), hereafter referred to as the GLVIA.

5.2.2 The accompanying Design and Access Statement summarises the LVIA and both documents should be referred to understand how the Proposed Development would be appreciated from nearby viewpoints.

Construction

5.2.3 Construction activity associated with the Proposed Development would be experienced in the context of the operational Site and would have little or no influence upon the character of the surrounding landscape or upon views, both of which are already influenced by the extensive and sometimes tall industrial structures present. As such, construction stage effects would not be significant.

Landscape Effects: Operational

5.2.4 The Proposed Development would comprise a limited addition to the existing assemblage of structures within the wider Kronospan site. Whilst the new structures would be large in their own right, they would be in keeping with the

size and scale of existing structures and be very similar to these in form and materials.

- 5.2.5 From within much of Chirk, the existing structures at the wider Kronospan site, and vegetation cover within the town would screen the new structures. Similar screening would be provided from along much of the canal corridor, and from the more formal areas of the Chirk Castle estate.

Visual Effects: Operational

- 5.2.6 From some locations the Proposed Development would be largely screened from view by existing structures. At others, chiefly north of the Kronospan site including along the canal corridor, the Proposed Development would wholly or partially screen views of existing. In these cases, the introduction of the Proposed Development would not appreciably increase the amount of built development visible, but rather would simply give rise to relatively limited change in what is visible, i.e. replacing one visible structure with another.

- 5.2.7 When viewed from locations more directly east or west of the Kronospan site, the introduction of the Proposed Development would result in a limited increase in the horizontal spread of large-scale structures in the view. This would not give rise to any widespread or otherwise notable change in the views available from these areas, where clear views of the Kronospan site are already typically available.

- 5.2.8 The Proposed Development would result in only a limited and incremental change to the assemblage of elements within the wider Kronospan site. Several of the existing structures are larger than the Proposed Development in terms of height or floorspace. The site as a whole has a well-established influence upon views across the surrounding landscape and the various structures are familiar features. The further presence of the new structures forming part of the Proposed Development would have little or no appreciable effect upon this influence.

Effects on Landscape Designations

- 5.2.9 As noted above, neither the landscape effects nor the visual effects of the Proposed Development would be significant. As such, it follows that the presence of the Proposed Development would not have a material effect

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

Cumulative Effects

- 5.2.10 In a scenario where the five consented cumulative schemes set out in Section 3 are present, this would incrementally increase the well-established influence of the wider Kronospan site upon the surrounding landscape and upon views. Their presence would not however open up any new aspect of visibility or views towards the Proposed Development, which would continue to be well screened by existing structures and by vegetation cover.
- 5.2.11 As such, the effects of the Proposed Development would not materially differ from those described above. Cumulative effects would not be significant.

Landscape Conclusions

- 5.2.12 As the landscape and visual effects of the Proposed Development would not be significant, no further specific mitigation measures are deemed necessary.

5.3 Cultural Heritage

- 5.3.1 A Desk-based Archaeological and Cultural Heirtage Assessment is appended to this report at Appendix B, which has assessed the impact that the Proposed Development may have on the archaeological / historic resource. During the production of the report, it has become clear that the industrial estate within which Kronospan is included is circumscribed by a cultural landscape of utmost importance which runs from medieval to post medieval chronologies.
- 5.3.2 This landscape helps to constitute the Essential Setting from which the WHS is experienced in and around Chirk, and therefore its integrity should be protected.
- 5.3.3 The Proposed Development will have a very slight to negligible impact on the Essential Setting of the WHS. This is because it is within an area already

heavily developed and also because its design will be in keeping with the pre-existing industrial character of the Kronospan site as a whole.

5.4 Air Quality Assessment Technical Note

5.4.1 A Technical Note has been produced by Smith Grant to assess the Proposed Development in terms of its impact on Air Quality. This is found at Appendix C of this Planning Statement.

5.4.2 Particulate matter emissions from point and fugitive sources associated with the chip preparation building, and associated activities, at the Facility are presently controlled under an environmental permit issued by WCBC. This is presently in the process of being consolidated with the activities currently permitted by NRW into a single permit for the facility and which would be regulated in the future solely by NRW. As part of the consolidation / variation application process potential impacts associated with point source particulate matter emissions have been assessed through detailed air quality dispersion modelling and assessment. The assessment was highly conservative and concluded the existing emissions do not result in exceedance of established AQALs.

5.4.3 The proposed alterations to the existing chip preparation building would result in an additional bag filter box and associated stack and relocation of the existing particulate matter release points. The additional point emission source would be subject to specified emission limit values as per the existing emission sources. Based on the findings of the current Fichtner AQA, and distance of the chip preparation building from the modelled receptor points, it is not considered that these changes would result in significant impacts on local air quality at these receptors. The proposed changes would also need to be subject to review and assessment under the Environmental Permitting regime and the earlier atmospheric dispersion modelling exercise revised to incorporate the proposed changes.

5.4.4 The management and control of other particulate matter emissions from the changes, including from any vents on the silos, would be as per the existing measures for existing plant. Given this, and the distance of the area of interest from sensitive receptors no significant impacts that would preclude planning permission for the proposed development have been identified

5.5 Noise

- 5.5.1 A Noise Impact Assessment is provided in Appendix D. This assessment has been undertaken in accordance with appropriate standards and guidance and the approach agreed with the WCBC Environmental Health Officer with regards to the assessment of noise impacts from previous development at this manufacturing site.
- 5.5.2 The assessment has been undertaken to inform and guide the design of the development such that any likely noise impact on existing noise sensitive receptors (NSRs), such as dwellings, is minimised. Existing background noise monitoring data has been used along with contemporary site specific monitoring to determine the baseline noise conditions at nearby residential receptors.
- 5.5.3 The Proposed Development predictions in terms of contributory noise levels at NSRs are shown to be between 15dB and 31dB L_{Aeq} during daytime and night-time periods at nearest sensitive receptors.
- 5.5.4 The background sound levels at night-time (i.e. lowest likely) for comparison vary between 30dB and 51dB L_{A90} with residual L_{Aeq} levels typically between 37dB and 54dB.
- 5.5.5 The positive effect of the installed new plant since 2011 and overall improvement in site noise levels is shown in the results of the latest baseline survey, indicating a reduction in background noise levels at all receptor positions.
- 5.5.6 The Proposed Development is not expected to generate any unusual noise characteristics perceptible at nearest sensitive receptors as the measurement of existing similar plant on Site has shown no tonal characteristics.
- 5.5.7 The results show that the Proposed Development would not result in any background noise 'creep' in accordance with H3 Horizontal Guidance Note for Noise Part 2: Noise Assessment and Control and BAT.
- 5.5.8 The magnitude of impact from the Proposed Development during daytime or night-time is shown to be a low impact.

- 5.5.9 The magnitude of impact from the cumulative effects of the site in operation during daytime or night-time is shown to be a low impact or below an adverse impact.
- 5.5.10 Noise levels to the northeast and northwest directions show a reduction in noise levels from the Wood Chip Preparation associated plant due to the screening effects from the proposed silos, removal of roller doors at ground level and the lowering of filter boxes from mezzanine level to ground level.
- 5.5.11 The noise from the operation of the Proposed Development would result in noise levels complying with all relevant standards for noise at the nearest sensitive receptors.
- 5.5.12 There would be no increase expected in road traffic movements as a result of the Proposed Development and therefore no impacts on road traffic noise would occur.

5.6 Ecology

- 5.6.1 Currently the Site has very limited ecological value and does not form part of any statutory designated site for nature conservation.
- 5.6.2 There are five statutory designated sites within a 5km radius of the Site boundary, and three non-statutory sites within a 2km radius. This includes the Afon Dyfrdwy a Llyn Tegis / River Dee and Bala Lake SAC, Castell Y Waun A'l Barcdir / Chirk Castle and Parkland SSSI, and the Afon Dyfrdwy / River Dee SSSI. The Proposed Development would not directly impact any of these designated sites given the separation distance: the nearest statutory designated site is 1km away, and the nearest non-designated site is 300m to the west (Coed y Camlas / Canal Wood Wildlife Site).
- 5.6.3 No structures or trees within the Site boundary would have the potential to support roosting bats or breeding birds. The habitats within the Site provide little value for foraging and commuting bats due to the low-quality habitats present and the high levels of lighting at the existing Kronospan facility.

5.7 Drainage

- 5.7.1 As existing, the surface water from the entire installation with the exception of the PB Pre-production area, drains to two lagoons which are on the northern boundary of the Site.
- 5.7.2 There is a third lagoon which takes surface water from the log yard. Currently, the log yard partially consists of hardstanding, with some soft landscaping. The third lagoon has been sized to accommodate surface waters in the event that the log yard were to become entirely hardstanding, which the Proposed Development would not result in. The Site also has provision within the operation of the lagoons to deal with heavy rainfall events.
- 5.7.3 Hence, the existing provisions are considered adequate for both the existing and future scenarios.

6.0 CUMULATIVE EFFECT

6.1.1 Several planning permissions have been granted in recent years for developments which form part of the ongoing investment at the Site. This includes:

- Logyard silos and RCT offloading and grading facilities (Operational);
- Melamine facing press hall / building (Operational);
- Wood Chip Preparation Building and WESP Chip Dryer (Operational);
- Log Offloading Facility and Flaker Facility (Linked to OSB) and Refurbishment of the Existing Chipper (Chipper refurbishment is complete and operational);
- Raw Board Storage (Not yet commenced);
- Oriented Strand Board (OSB) Facility (Not yet commenced); and
- North-East Warehouse Building (Being constructed).

6.1.2 Most of the above developments form part of the Kronospan Vision 2020 strategy and the locations of these proposals are shown on Figure 2.

6.1.3 A planning application has been submitted to construct a building on the site of the existing reception building and loading yard known as the 'covered loading yard' (application reference: P/2022/0336). This has not yet been determined by WCBC.

6.1.4 An application for engineering stores and accompanying apprenticeship workshop has completed the statutory public consultation process and is being finalised by the project team ready for submission to WCBC in June 2022.

6.1.5 As some of these developments have / would become operational at around the same time, it is important to take into account the cumulative effects of the developments alongside the Proposed Development.

6.1.6 As discussed above (and also reiterated below in the context of relevant planning policy) there would not be a detrimental impact in terms of landscape and heritage. The cumulative effect of the applications include an overall reduction in the noise resulting from the manufacturing site operations, less potential for fugitive dust emissions, and some reduction in vehicle trips.

- 6.1.7 From an economic and social perspective, it has been highlighted on several occasions that the implementation of the Kronospan Vision 2020, has enabled diversification of the business and increase the productivity and efficiency of the site, whilst ensuring no overall job losses and would improve operational efficiency.
- 6.1.8 Based on the environmental assessments which accompany the Proposed Development the conclusion is that there would be no significant adverse cumulative effects would arise from the construction and operation of the Proposed Development.

7.0 PLANNING POLICY CONTEXT AND APPRAISAL

7.1 Introduction

7.1.1 This section of the Planning Statement provides an analysis of the Proposed Development in the context of all current, relevant planning policy and guidance.

7.1.2 Following on from this introduction the policy appraisal is divided into three sections. Section 7.2 provides a brief overview of the relevant policy context and identifies the principal documents to which further reference will be made. Section 7.3 provides a detailed assessment of how the Proposed Development accord or otherwise with the relevant policy considerations.

7.2 Policy Context – Overview

The Statutory Development Plan

7.2.1 Section 38(6) of the Planning and Compulsory Purchase Act (September 2004) and paragraph 1.18 of Planning Policy Wales (February 2021) require that applications for planning permission should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

7.2.2 The relevant statutory Development Plan comprises the Wrexham Unitary Development Plan 1996-2011 (UDP), which was adopted on the 14th February 2005.

7.2.3 The key environmental considerations in relation to the Proposed Development at the existing Kronospan site are noise, visual impact (including heritage), and drainage. The relevant policies of the UDP in relation to these matters, as well as the general principle of the development, have been identified as follows:

- Policy PS1 – PS4: Strategic Policy (The Broad Location of Development)
- Policy GDP1: Development Objectives
- Policy EC7: Conservation Areas
- Policy EC11: Archaeology
- Policy EC13: Surface Water Run-off
- Policy E4: Employment Development (of un-annotated land) within Settlements

Material Considerations

7.2.4 In addition to the policies of the statutory Development Plan, the Proposed Development has also been considered in the context of other material planning considerations. These include the following:

The Emerging Development Plan

- Wrexham Local Development Plan (2013 - 2028) - Deposit Plan (March 2018)

Other National, Regional and Local Planning Considerations

- Planning Policy Wales Edition 11 (February 2021);
- Technical Advice Note (TAN) 11: Noise (1997)
- Technical Advice Note (TAN) 12: Design (2016)
- Technical Advice Note (TAN) 15: Development and Flood Risk (2004)
- Technical Advice Note (TAN) 23: Economic Development (2014);
- Technical Advice Note (TAN) 24: The Historic Environment (2017)
- Future Wales: The National Plan 2040 (2020);
- The following Wrexham Council Local Planning Guidance Notes:
 - Local Planning Guidance Note No. 6 – Access to and Use of Buildings
 - Local Planning Guidance Note No. 26 – Landscape and Industrial Development
 - Local Planning Guidance Note No. 30 – Design
 - Local Planning Guidance Note No. 33. – Pontcysyllte Aqueduct & Canal

7.3 Planning Policy Context and Appraisal

7.3.1 The following sub-section sets out the policies contained within the statutory Development Plan and other material considerations that are of relevance to the Proposed Development. The objective of this assessment is to determine whether the Proposed Development would lead to the achievement, or otherwise, of national and local planning policy and guidance objectives. The appraisal also establishes the degree to which the Proposed Development is supported by, or conflicts with, other material planning considerations.

The Development Plan - Wrexham Unitary Development Plan 1996-2011 (February 2005)

7.3.2 The Wrexham Unitary Development Plan (UDP) was adopted in February 2005 and was originally scheduled to cover the period to 2011. Its primary functions are to set out planning policies and to provide a basis for decisions on planning applications and to make proposals for development and the use of land. There are several strategic policies of relevance to the Proposed Development.

Policy PS1 and Policy PS2: Strategic Policies (The Broad Location of Development)

7.3.3 Policies PS1 and PS2 are strategic policies which aim to ensure that new development for housing, employment and community services will be directed to within defined settlement limits/employment areas and that the countryside, landscape/townscape character, open space, or the quality of the natural environment are not detrimentally affected by development.

7.3.4 The Kronospan site comprises a number of existing large industrial process buildings including air emissions stacks, storage areas for raw materials, warehouse buildings for manufactured products, offices and car parking. The Proposed Development would be within the existing Kronospan Facility, which is within the Chirk settlement boundary as defined on the Proposals Map which supports the UDP. It would also be towards the middle of the Site adjacent to the main processing buildings.

7.3.5 The Proposed Development would not detrimentally affect the character of the local area or the quality of the natural environment.

7.3.6 The overall outcome of the project at the manufacturing site would be no impact in terms of noise, trees and ecology, negligible impacts on the historic environment, and no significant effects in terms of landscape and visual impacts. For these reasons, the Proposed Development accords with Policies PS1 and PS2.

Policy PS3: Strategic Policy (The Broad Location of Development)

7.3.7 Policy PS3 aims to ensure that development is directed at previously developed brownfield sites rather than greenfield land, wherever possible.

7.3.8 Planning Policy Wales (PPW) includes a definition of previously developed (or brownfield) land (page 37). It is:

“land...which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure. The curtilage...of the development is included...”

7.3.9 The curtilage is further defined as:

“The curtilage is defined as the area of land attached to a building. All of the land within the curtilage of the site will also be defined as previously-developed. However this does not mean that the whole area of the curtilage should therefore be redeveloped...”

7.3.10 Based on these definitions the Proposed Development would be on previously developed land and within the curtilage of the existing wood chip preparation and processing buildings on site. Most of the site consists of hardstanding.

7.3.11 Therefore, the Proposed Development would be on previously developed land and accords with Policy PS3.

Policy PS4: Strategic Policy (The Broad Location of Development)

7.3.12 Policy PS4 aims to ensure that development maintains the existing settlement pattern and character and is integrated in the existing transport network.

7.3.13 The Proposed Development would maintain the existing settlement pattern and character. It would be within the existing Kronospan Facility, which is clearly defined, with the eastern boundary being marked by the B5070 Holyhead Road. The existing facility is a collection of buildings with large footprints which reflect their industrial and ancillary storage use.

7.3.14 The Proposed Development would not have a material impact on the existing transport network. The proposed large raw storage silos will internalise the existing materials stored on site. The proposed extension to the chip preparation building would increase the use of RCF in the manufacture of the chip material, replacing the use of virgin wood, and streamline the overall production process. Therefore, there would be no additional traffic

movements generated compared to the current situation as there would be no increase in the amount of wood product produced on site.

- 7.3.15 The manufacturing site represents a sustainable location for a commercial development, being within an acceptable walking and cycling catchment of local residential areas, as well as being accessible by both bus and rail services to/from key local settlements nearby. These public transport services reduce the need for employees at the site to utilise the car for commuting journeys. However, the Proposed Development would not generate employment, except for potentially consolidating a small number of roles.

Policy GDP1: Development Objectives

- 7.3.16 Policy GDP1 sets out eleven objectives for all new development. The following five objectives are particularly relevant to the Proposed Development:

- *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 where possible.*
- *f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.*
- *i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site.*
- *k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.*

- 7.3.17 The Proposed Development would be a substantial cluster of structures, particularly in terms of footprint. However, it would always be viewed in the context of the existing large buildings which collectively form a large industrial facility. Views would be overwhelmingly from within the manufacturing facility itself. The Design and Access Statement which accompanies this planning application appraises the Proposed Development in detail.
- 7.3.18 As described within Section 2, the materials used in the construction of the Proposed Development would be exactly the same as the existing wood chip preparation building and storage silos on site within the Kronospan Facility. The walls and roof would be clad with galvanised steel sheeting in a pale grey colour (RAL 7035 light grey), which would allow the building to blend-in against the existing warehouse building when viewed from within the Kronospan Facility. The proposed silos would be made of concrete, which would also be light grey in colour. Accordingly, the Proposed Development would accord with the character of the site and surroundings. The Design and Access Statement provides a more detailed evaluation of the design and how it responds to its context.
- 7.3.19 The public transport links have been referred to above and being within the settlement boundary of Chirk inherently means that the manufacturing site is well located to allow people to walk and cycle to and from it.
- 7.3.20 The Proposed Development would replace the current open storage area with raw material storage silos, which would minimise damage to materials on site and reduce the need to dispose of damaged goods. The Proposed Development will also result in an increase in the use of RCT material on Site, replacing the use of virgin wood and increasing Kronospan's sustainability credentials.
- 7.3.21 The Proposed Development will use the existing on-site drainage infrastructure.
- 7.3.22 Kronospan was the 9th largest manufacturer in Wales in 2020¹ and provides direct employment for over 600 people, of whom 90% live within 10 miles of

¹ Research compiled by the University of South Wales Business School: <https://www.business-live.co.uk/economic-development/biggest-firms-wales-19439338>, Accessed 22 February 2022

the site. The Proposed Development would enable Kronospan to further improve the efficiency of their operations at the Chirk site. This would improve the company's ability to compete effectively with rival wood-based panel manufacturing companies across Europe, contributing to the economic sustainability of this important local employer. The Proposed Development would also ensure that there are no overall job losses with potential for a slight increase.

7.3.23 The Proposed Development is considered to accord with Policy GDP1.

Policy EC7: Conservation Areas and EC11 Archaeology

7.3.24 Policy EC7 seeks to ensure that conservation areas are preserved or enhanced and requires new development *within or in close proximity* to be compatible with the special qualities of the conservation area.

7.3.25 Policy EC11 sets out that development which would adversely affect the site or setting of Scheduled Ancient Monuments, archaeological sites of importance, or non-scheduled monuments or sites, will not be permitted.

7.3.26 The LVIA provides an assessment of the impact of the Proposed Development on heritage assets. Chirk Conservation Area lies approximately 500 metres to the south of the Proposed Development. No development is proposed within the conservation area and the Proposed Development would be unlikely to be visible outside of the Kronospan Facility.

7.3.27 A Desk-based Archaeological and Cultural Heritage Assessment is appended to this report at Appendix B, which has assessed the impact that the Proposed Development may have on the archaeological / historic resource. The assessment has found that the Proposed Development will have a very slight to negligible impact on the Essential Setting of the WHS. This is because it is within an area already heavily developed and also because its design will be in keeping with the pre-existing industrial character of the Kronospan site as a whole.

7.3.28 On this basis it can be concluded that the Proposed Development would not be contrary to Policy EC7 and Policy EC11.

Policy EC13: Surface Water Run-Off

- 7.3.29 Policy EC13 states that development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted. The drainage arrangements would be demonstrated as part of a Sustainable Drainage Approval Board (SAB) application.

Policy E4: Employment Development (of un-annotated land) within Settlements

- 7.3.30 This policy confirms that employment development proposals on unannotated land within settlements will be permitted provided it accords with Policy GDP1.
- 7.3.31 The Kronospan site is not allocated² for employment within the UDP but has been occupied by the manufacturing facility, and thus in employment use, for over forty years. The application site is within the settlement limits of Chirk as identified on UDP Proposal Map 4: Inset 7. Additionally, the Proposed Development has been found to be in accordance with Policy GDP1 and therefore the fulfils the requirements of Policy E4.

Material Planning Considerations

Wrexham Local Development Plan (2013 - 2028) - Deposit Plan (March 2018)

- 7.3.32 WCBC is in the process of preparing a new Local Development Plan (LDP) for the County Borough. The LDP is WCBC's land use plan that will establish where and how much new development will take place in the County Borough over the period 2013 – 2028. It will also identify which areas need to be protected from development. Once adopted, the LDP will replace the UDP and will be used to make decisions on all planning applications.
- 7.3.33 The Deposit Plan is the second formal publication of the evolving LDP document. In addition to identifying where and how much new development will take place in the County Borough, the LDP identifies those areas which need to be protected for their environmental qualities.

² The terminology is slightly different, but “un-annotated” and “unallocated” have been interpreted to refer to land and buildings in employment use which are not specifically highlighted on the Proposals Map.

- 7.3.34 The Plan was submitted to the Welsh Government and the Planning Inspectorate on 30th November 2018, but it was only officially acknowledged as being received on 18th April 2019. Hearings were held into the Plan in September and October 2019. Since then, there has been correspondence between WCBC and the Planning Inspectorate, which had been restricted to housing and gypsy and traveller accommodation site assessment and selection process.
- 7.3.35 In February 2022 there was correspondence between WCBC and the Planning Inspectorate in relation to Natural Resources Wales's new targets on release of phosphates into rivers in Special Areas of Conservation. The inspectors do not believe some of the housing sites would be viable as a result of these new phosphate targets. WCBC has liaised with Flintshire County Council to prepare a draft catchment phosphorous reduction strategy covering the River Dee, which outlines a number of mitigation measures to enable housing sites to be brought forward. The Welsh Government has endorsed this approach taken by the two local planning authorities.
- 7.3.36 In May 2022 WCBC started public consultation on the 'Matters Arising Changes' which have resulted from the hearing sessions held as part of the Examination of the emerging Local Plan. This consultation will run until 6th July 2022.
- 7.3.37 To conclude, the emerging Development Plan is at an advanced stage of its preparation. Given that the policies which remain under discussion relate to housing, due weight should be attributed to the remaining policies in the emerging plan in the determination of this planning application. The relevant policies and objectives are considered under the headings below.

Economy and Employment

- 7.3.38 Strategic Objective SO2 seeks to:

“Support a vibrant, diverse and competitive local economy that provides a range of job opportunities to enable new and existing businesses to grow in Wrexham County Borough with strategic growth in Wrexham Town and Wrexham Industrial Estate”.

- 7.3.39 This objective is supported by several policies including Strategic Policy SP2 *Location of Development*, Strategic Policy SP9 *Economic Growth, Employment and Enterprise* and Policy EM1 *Protection of Existing Employment Land*.
- 7.3.40 Policy SP2 requires that new development is directed to the defined settlement limits and employment areas as identified on the Proposals Map. Policy SP9 safeguards existing important industrial estates which are “*essential to meeting the future economic growth of the County, which ensures a range and choice of sites co-located with housing in both urban and rural settlements*”. This seeks to facilitate a level of growth which allows opportunities to deliver approximately 4,200 jobs in the County Borough over the Plan period.
- 7.3.41 Policy EM1 identifies 25 existing employment areas which will be protected for B Use Class employment generating uses, and the Chirk Industrial Estate, Chirk and Canal Wood Industrial Estate, Chirk (hereafter referred to as the Chirk Industrial Estate) is one of these areas.
- 7.3.42 The draft Proposals Map shows the extent of the Chirk Industrial Estate employment area alongside the settlement boundary for Chirk, with both being mutually exclusive but adjoining. This is in contrast to the UDP which did not define a specific area for employment and instead had a settlement boundary which included the employment area alongside the rest of Chirk without differentiation.
- 7.3.43 Therefore, adopted policy PS1 and draft policy SP2 are similar in their approach to directing development to the defined area of Chirk. However, they differ in that draft policy SP2 identifies settlement limits as distinct from employment areas.
- 7.3.44 The draft Proposals Map shows the boundary of the Chirk Industrial Estate and includes the Facility (and hence the Site) within it.
- 7.3.45 The introduction of this specific allocation is considered to add support for the Proposed Development. Although draft policy EM1 is about protecting existing uses, policy SP9 identifies the safeguarded sites as being (with added emphasis) “*essential to meeting the future economic growth*”, and so the proposed approach within the LDP is more than simply maintaining the

status quo. It seeks additional development on top of protecting what is already there.

7.3.46 The Proposed Development is part of a programme of continual improvement of the operational efficiency of the site which will allow Kronospan to compete effectively and maintain its current levels of employment.

7.3.47 The policy and objectives centred on Economy and Employment therefore add weight to the policy support for the Proposed Development.

Historic and Cultural Environment

7.3.48 Strategic Policy 15 *Historic and Cultural Environment* confirms that development will only be supported where it conserves, protects and enhances cultural and heritage assets of the County Borough and, where appropriate, their settings.

7.3.49 The Kronospan Facility is an established part of the context of the south-eastern edge of the AONB. Policy NE4: *Area of Outstanding Natural Beauty* sets out that within the AONB development will only be supported where it conserves or enhances the natural beauty of the area and its setting. Criteria that development must meet in relation to the AONB are also set out in this policy.

7.3.50 The LVIA completed to support this application is discussed above. It also considered the impact on heritage assets. The LVIA concludes that the additional presence of the Proposed Development would be unremarkable and would result in little or no appreciable change to existing influence of the Kronospan Facility upon its surroundings. Neither the landscape effects nor the visual effects of the Proposed Development would be significant.

7.3.51 A Desk-based Archaeological and Cultural Heritage Assessment is appended to this report at Appendix B, which has assessed the impact that the Proposed Development may have on the archaeological / historic resource. The assessment has found that the Proposed Development will have a very slight to negligible impact on the Essential Setting of the WHS. This is because it is within an area already heavily developed and also because its design will be in keeping with the pre-existing industrial character of the Kronospan site as a whole.

7.3.52 Therefore, the Proposed Development is in accordance with policies and objectives related to the historic and cultural environment.

Development Management

7.3.53 Policy DM1: *Development Management Considerations* sets out 12 general criteria that development must fulfil, and it is considered that the Proposed Development satisfies all these requirements. This includes the need for development proposals to accord with or enhance local character, distinctiveness and the appearance of the site. Developments should also not have an unacceptable effect on the amenity of occupiers and should not increase the risk of flooding.

7.3.54 The material considerations which are mentioned in the policy are referred to in the adopted UDP and have been considered and found to be acceptable in this Planning Statement, and the other documents which accompany the planning application. Material Planning Considerations – Other National, Regional and Local Planning Considerations.

Planning Policy Wales (Edition 11, February 2021)

7.3.55 Planning Policy Wales (PPW), which is supplemented by Technical Advice Notes (TANs) and circulars, is the national planning policy for Wales and sets out the land use policies of the Welsh Government. The policies of relevance to the Proposed Development have been considered in the subsequent section. PPW and the TANs are material to decisions on individual planning applications and, as such, it is important to consider how the Proposed Development fits within this policy context.

7.3.56 The PPW defines “Sustainable Development” as meaning “the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.”

7.3.57 The following chapters of PPW are considered relevant to the Proposed Development:

- Chapter 3 – Strategic and Spatial Choices
- Chapter 5 – Productive and Enterprising Places
- Chapter 6 – Distinctive and Natural Places

- 7.3.58 Paragraph 1.18 states that the planning system provides for a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.
- 7.3.59 The relevant advice within these chapters of PPW is outlined below and considered in the context of the Proposed Development.
- 7.3.60 Chapter 3 relates to 'Strategic and Spatial Choices'. This includes considering the design of a development and its impacts upon everyday lives. Design is considered to be more than appearance but includes the relationship between all elements of the natural and built environment, and between people and places. Objectives of good design shown in Figure 8 of the PPW include Environmental Sustainability, Community Safety, Character, Access and Movement.
- 7.3.61 Chapter 3 is crosscutting and applies to a number of aspects of the development described and assessed above. The documents which accompany this planning application conclude that the Proposed Development would not give rise to any significant adverse effects. It is clear that the Proposed Development would contribute to sustaining the valuable economic contribution that the business makes to the local and national economy.
- 7.3.62 Chapter 5 provides policy and guidance on '*Productive and Enterprising Places*', which is the economic component of placemaking. Places which promote economic, social, environmental and cultural well-being by providing a well-connected employment and sustainable economic development are considered productive and enterprising.
- 7.3.63 This is to be achieved by ensuring that there is sufficient employment land to meet the needs and requirements of a range of future employment scenarios. Planning authorities are encouraged to support provision of sufficient land to meet the needs of the employment market, and wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration.

- 7.3.64 As noted above and discussed further in the next section of the report, the Proposed Development provides significant economic benefits to Wrexham and Wales and therefore makes a positive contribution to this national policy goal.
- 7.3.65 Chapter 6 considers '*Distinctive and Natural Places*', which includes the environmental and cultural components of placemaking. The PPW advises that a prosperous Wales can be achieved by valuing the quality of the landscape and historic environment, which should be protected in their own right. They give places their unique identity and distinctiveness and provide cultural experiences and healthy lifestyles.
- 7.3.66 The Proposed Development would respect the historic environment and have no impact on the existing natural environment.
- 7.3.67 Based on the above it is clear that the Proposed Development constitutes sustainable development as defined within PPW and therefore there is a presumption in favour of granting planning permission for the Proposed Development.

Conclusions

- 7.3.68 The Proposed Development would contribute to each of the national policies outlined above and it has been established that the Proposed Development represent Sustainable Development.
- 7.3.69 The Proposed Development would result in operational benefits, enabling Kronospan to operate more efficiently. The Proposed Development would therefore help secure the ongoing success of this important local employer.
- 7.3.70 The overall outcome of the Proposed Development would be to provide no impact in terms of noise, negligible impacts in terms of historic environment, no significant effects in terms of landscape and visual impacts and enable Kronospan to secure improvements in efficiency and current employment levels.
- 7.3.71 On the basis of the above it is considered that the Proposed Development is in accordance with all relevant national planning policies.

Technical Advice Note (TAN) 11: Noise (2016)

- 7.3.72 TAN 11 concerns noise. It includes advice to be considered when determining planning applications, with local planning authorities advised to ensure that noise generating development does not cause an unacceptable degree of disturbance.
- 7.3.73 TAN 11 also advises on measures to mitigate the impact of noise, which fall into three categories: engineering, layout-out, and administrative.
- 7.3.74 The Proposed Development would generate limited noise with activities taking place within the proposed building and structures which has limited openings.

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

- 7.3.75 TAN 12 provides advice in respect of delivering good sustainable design. The planning application is accompanied by a Design and Access Statement which describes the approach undertaken to the design and considers a number of matters including access and movement, character, layout and appearance.
- 7.3.76 Section 3.0 of the TAN describes the design process. At paragraph 3.2 it states that “*appreciation of the site’s context, and the development of a vision and agreed design objectives must be established and remain central to the evolutionary [design] process.*”
- 7.3.77 The Proposed Development is a functional development to improve the chip preparation and manufacturing process conducted on site. Therefore, the principal design driver is for the proposed building extension and structures to fit into its local context i.e. an industrial site, and to reduce the visual impact from any locations outside the site from where it can be seen.
- 7.3.78 The TAN highlights how appraising the local context is a vital early step in the design process. At paragraph 4.5 it notes that “*the local context will highlight distinctive patterns of development or landscape where the intention will be to sustain character*”. In terms of character the TAN states at page 19 that the design should respond to:
- landscapes and townscapes, culture and biodiversity;

- locally distinctive patterns and forms of development;
- existing buildings, infrastructure, urban/rural landscape and public art;
- clear boundaries and established building lines;
- appropriateness of uses and the mix of uses and densities; and
- easily recognisable and understood features and landmarks,

7.3.79 The Proposed Development would be in the middle part of the Kronospan Facility adjoining the existing processing buildings which would have a similar floor to ceiling heights and overall design to the proposed building and structures. The Kronospan Facility forms an established landmark locally and whilst undoubtedly its character is very different from the rest of Chirk, it has become a valid and distinctive component of the local 'sense of place'. This influence is documented within the adopted Chirk Conservation Area Assessment and Management Plan (2014).

7.3.80 The Proposed Development would be consistent in height with the surrounding structures. As set out in the Design and Access Statement, the Proposed Development would be clad in pale grey cladding (RAL 7035 light grey) to match the existing surrounding processing buildings and structures (subject to the agreement of WCBC) to reduce the visual impact of the facility.

7.3.81 The Chirk site is an existing large-scale industrial site that has an established influence upon the town of Chirk and the surrounding rural area. Views of existing tall, bulky structures at the Kronospan site are commonplace within the study area and their presence is an established part of the character of the landscape. The Proposed Development would be similar to the existing buildings and structures within the Kronospan Facility and so would not be prominent against the sky.

7.3.82 TAN 12 requires that in areas recognised for their landscape, townscape, architectural, archaeological and/or historic value, such as National Parks, Areas of Outstanding Natural Beauty, World Heritage Sites and conservation areas, the objective of sustaining character is particularly important and context appraisals should reflect this. The Heritage Desk-Based Assessment provided as part of this planning application considers heritage matters. The assessment concludes that the additional presence of the Proposed Development would be unremarkable and would result in little appreciable

change to the existing influence of the Kronospan Facility upon the surrounding area, including upon the designation of the AONB, Pontcysyllte Aqueduct and Canal WHS and Scheduled Monument, Chirk Castle Historic Park & Garden and Chirk Conservation Area.

Technical Advice Note (TAN) 15: Development and Flood Risk (2004)

- 7.3.83 The site is not at risk from flooding from rivers or the sea but TAN 15 also advises on surface water runoff. Development should not increase flood risk elsewhere, which requires runoff to be properly managed.
- 7.3.84 The surface water runoff would be managed and demonstrated as part of a SAB application.

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

- 7.3.85 TAN 23 provides advice on various aspects relating to economic development including developing high level economic planning objectives and assessing the economic benefits of new development.
- 7.3.86 Paragraph 2.1.1 states that *“It should not be assumed that economic objectives are necessarily in conflict with social and environmental objectives. Planning should positively and imaginatively seek such ‘win-win’ outcomes, where development contributes to all dimensions of sustainability”*.
- 7.3.87 As noted above, the Proposed Development is intended to add operational efficiency to the existing plant and follows on from the successful Kronospan Vision 2020.

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

- 7.3.88 TAN 24 provides advice on how the historic environment should be considered during development plan preparation and decision making on planning applications. Specific guidance is available on several aspects of the historic environment including:
- World Heritage Sites;
 - Scheduled Monuments; and
 - Conservation Areas.

7.3.89 Paragraph 1.26 of the TAN confirms that it is for the Applicant to provide sufficient information to allow the assessment of their proposals in respect of heritage assets. A Desk-based Archaeological and Cultural Heritage Assessment is appended to this report at Appendix B, which has assessed the impact that the Proposed Development may have on the archaeological / historic resource. The assessment has found that the Proposed Development will have a very slight to negligible impact on the Essential Setting of the WHS. This is because it is within an area already heavily developed and also because its design will be in keeping with the pre-existing industrial character of the Kronospan site as a whole.

Future Wales: The National Plan 2040 (2020)

7.3.90 The National Plan is a twenty year plan for the sustainable development of Wales. It contains a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities in Wales.

7.3.91 The National Plan contains strategic policies. Policy 1 identifies Wrexham as being within a National Growth Area.

7.3.92 There are separate policies for the regions of Wales, and the Site falls within the North region. There is a requirement for a Strategic Development Plan to be created to consider regional planning issues, but this does not yet exist.

7.3.93 Policy 20 is specific to the National Growth Area which extends across Wrexham and Deeside, identifying that this will be the main focus of growth and investment within the North region.

7.3.94 The Proposed Development would represent growth and investment and so contributes to the continued economic success of the Kronospan Facility, which is in the part of the North region where the main focus of economic development is located. The Proposed Development would make an important contribution to meeting the aims of the Spatial Plan.

Local Planning Guidance Notes

7.3.95 WCBC has produced Local Planning Guidance Notes on multiple topics; these notes expand on the detail provided in the UDP policies and provide further indication of WCBC's approach to planning issues. The Local Planning Guidance Notes have been reviewed and some have been identified to be of relevance to the Proposed Development, these documents are considered with regard to the Proposed Development below. It should be noted that whilst effects on the Chirk Conservation Area have been considered within this application, specifically in relation to Policy EC7 of the UDP, the Local Planning Guidance Note 4 (Conservation Areas) is not relevant to the application as it deals solely with development *within* conservation areas.

Local Planning Guidance Note No. 26 – Landscape and Industrial Development

7.3.96 This note aims to improve the understanding of the landscape and environmental issues which WCBC will take account of when determining applications for industrial development. It advocates that high-quality design can improve the image of a business, attract high-quality staff and encourage investment.

7.3.97 As described in Section 5, the Proposed Development is substantial in size, but would sit alongside other industrial buildings and structures as part of the wider facility. The intention is to use cladding which is pale grey (RAL 7035 light grey) in colour on the proposed building and structures to match the existing surrounding buildings within the Facility. The proposed colour of the cladding would reduce the visibility of the Proposed Development when viewed in the context of the Kronospan Facility as a whole. If WCBC, neighbouring residents or other stakeholders have a different colour preference for the cladding then the Applicant would welcome the opportunity to discuss this and potentially agree this via a planning condition.

7.3.98 On the basis of the foregoing it is considered that the principles of Local Planning Guidance Note 26 have been adopted.

Local Planning Guidance Note No. 33 – Pontcysyllte Aqueduct & Canal World Heritage Site

- 7.3.99 The stated aim of the guidance note is to ensure the integrity of the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS), its buildings, structures and landscape are maintained. It sets out the need to consider the impact of Proposed Development on the World Heritage Site and its setting.
- 7.3.100 The LVIA which accompanies this planning application demonstrates that the visibility of the Proposed Development would be minimal and it would be viewed within the context of the existing manufacturing facility.
- 7.3.101 It is concluded that the visual extent of the Kronospan site would not change significantly, nor would its influence upon the character of the WHS.

On this basis it is concluded that the Proposed Development would not give rise to any impact upon the heritage significance of the Pontcysyllte Aqueduct and Canal World Heritage Site, its buildings, structures and landscape. As such the Proposed Development would meet the stated aim of Local Planning Guidance Note No. 33.

8.0 CONCLUSION

- 8.1.1 The Proposed Development follows on from a substantial development programme to ensure the long term economic viability of the manufacturing facility and deliver environmental improvements. The Proposed Development would deliver efficiencies in how the Kronospan Facility operates through the extension of the chip preparation building and internalisation of the storage of the raw materials to be fed into the chip preparation building and the storing of the chip material. The Proposed Development would also replace the use of virgin wood materials in the manufacture of the chip material with Recycled Timber (RCT), which would in turn improve the businesses sustainability credentials.
- 8.1.2 The Proposed Development would help sustain the existing business which provides employment to circa 600 staff and in turn the circa 6,000 plus people in the UK indirectly supported by its operations. The Proposed Development would enable the existing jobs to be sustained.
- 8.1.3 The Proposed Development would result in a slight reduction in noise, as the current activities would be internalised within a building which would feature 100mm insulation to both the roof and walls.
- 8.1.4 An assessment of the Proposed Development against the relevant planning policy and guidance has demonstrated that the Proposed Development meets the test of Section 38(6) of the Planning and Compulsory Purchase Act and paragraph 1.18 of PPW as it fully complies with the provisions of the statutory Development Plan. Furthermore, it has been established that the Proposed Development constitutes Sustainable Development as defined within PPW and therefore there is a presumption in favour of granting planning permission for the development.
- 8.1.5 A comprehensive assessment of relevant material considerations has not revealed any justification for determining this application other than in accordance with the development plan. The Proposed Development is considered to strongly accord with, and be supported by, a range of material planning considerations.