



DESIGN & ACCESS STATEMENT

Full planning application for the erection
of polytunnels and all associated works

Prepared for Maelor Forest Nurseries
October 2020

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Applicant's Details

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Local Planning Authority

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Design and Access Statement as required by Section
42 of the Planning and Compulsory Purchase Act
2004

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1.0 Introduction

This planning application is submitted for the approval of the erection of polytunnels and all associated works at Maelor Forest Nurseries, Ellesmere Road, Whitchurch, SY13 3HZ.

This statement considers the planning issues relating to the application proposal. The information included within this statement is intended to assist the Planning Officer in making their decision.

The Statement assesses the site and its context by considering the physical, social, economic and planning situation.

The following drawings are submitted in support of the Design Statement (Appendix 1);

<u>DRAWING TITLE</u>	<u>SCALE</u>	<u>DRAWING NO.</u>
Location Plan	1:1250	RJC-MZ541-01 / 2
Block Plan	1:500	RJC-MZ541-02 / 2
Elevations		RJC-MZ541-03 / 2

2.0 Proposal

The proposal is for the erection of polytunnels which will consist of galvanised steel hoops covered with polythene sheeting to be used for crop protection from the weather.

It is proposed that there are:

12 x polytunnels measuring 260.99m x 12.80m

2 x polytunnels measuring 224.41m x 12.80m

The polytunnels will be multispan structures, which means that they will be linked to form a larger structure.

Requirement for Polytunnels

Maelor Forest Nurseries is a wholesale nursery producing bare root trees and shrubs suitable for forestry, Christmas trees, hedging and native woodland planting.

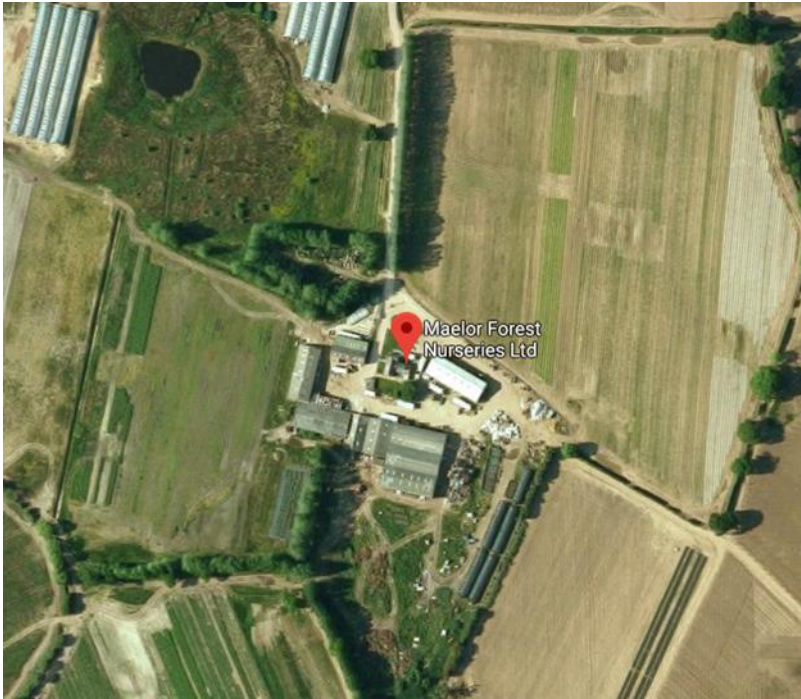
Polytunnels provide the benefits of extending the growing season by protecting the crops from inclement weather, widening the variety of crops grown and providing some protection against pests and diseases, thus reducing the need to spray fungicides and other crop protection chemicals.

3.0 Assessment of the Site and its Context

3.1 Physical Situation – The Context

The area is predominately rural with agriculture being the primary industry. The proposed site for the polytunnels is at Maelor Forest Nurseries, Whitchurch. It is proposed that the polytunnels will be sited to the North of the existing agricultural buildings.

Please see below a photograph of the site:



3.2 Physical Situation – The Site

The proposed polytunnels will be sited within an agricultural field. The area is predominately of agricultural use, the proposed polytunnels are of a typical design and scale to fit well within the area. To the west of the site are existing polytunnels, and therefore the proposal does not represent a major intrusion into an undeveloped area of the landscape. Site landscaping will reduce the visual impacts of the development.

3.3 Layout - Landscape






The site is currently laid to arable land and the site is bordered by mature hedgerows. The site adjoins the existing farm buildings at Maelor Forest Nurseries.

The landscape around the site consists of large undulating arable and pasture fields, the fields are generally bordered by mature hedgerows.

4.0 Development Concept

4.1 Principles

The following list outlines the key design principles that flow from the contextual analysis:

-  Mass – It is recognised that this is a large scale development in the rural countryside but it adjoins the existing agricultural unit; all the elements of the proposal are designed to create the minimum impact on the local landscape and to mitigate the impact where possible.
-  Layout – the polytunnels are designed so that maximum use is made of the existing screening of the hedges and contours.
-  Low profile – the polytunnel heights are kept as low as possible. The polytunnels proposed will not have a higher sight line level than the existing agricultural buildings.
-  Road Improvements – the site access has good visibility in both directions onto the Council Highway
-  Landscaping – the landscaping is designed to effectively screen the development from all views, the type and scale of landscaping reflects the existing landscape scene so that it blends in well.

4.2 Layout

The polytunnels design is illustrated on the proposed elevations, drawing no RJC-MZ541-03 / 2. The layout is illustrated on drawing no RJC-MZ541-02 / 2. The application is for full planning permission for the erection of polytunnels as illustrated on the proposed layout plans.

The polytunnels will measure:

12 x polytunnels measuring 260.99m x 12.80m x 6.23m to ridge

2 x polytunnels measuring 224.41m x 12.80m x 6.23m to ridge

4.3 Landscaping

The proposed landscaping plan for the site is designed to provide biodiversity benefits to the operational site whilst creating an attractive setting, softening the appearance and obscuring the proposed polytunnels from view. New planting will include suitable native species and shrubs from local stock, where appropriate, to provide screening and habitat areas for wildlife.

Hedgerows

As part of the landscaping scheme the applicant proposes to maintain the existing mature hedgerows and to grow an effective screen of the development through hedgerow management.

Traditionally, hedgerows were used to enclose or exclude animals and to mark ownership boundaries and rights of way. The particular mix of shrub and tree species in a hedgerow, which reflects both the age and local management customs, contributes to local landscape character. Hedgerows are a living part of landscape history and provide a record of use of the countryside over the centuries. The particular planting mix within the new hedgerows will reflect the local vernacular it will include hawthorn and blackthorn as a base species but will include additional species found locally in ancient hedges.

Rough Grassland

Within the site boundaries on land that can no longer be cultivated as part of usual cropping, areas of rough grassland will be created. The provision of a grassy area will greatly increase the wildlife interest of an arable field. The provision of a natural grassy area, containing some grassland flowering plants and scrub will benefit wildlife including invertebrates, birds, reptiles and amphibians (if located) near to a water feature.

4.4 Movement To, From and Within the Development

The site is accessed off the A495 from the existing access. When operational, the polytunnels will not generate any additional movements onto the highway.

5.0 Impact on Residential Amenity

Given the low-level nature of the development, the existing landscape features and the distance to neighbouring properties, the development will have little impact on adjoining properties or the local landscape.

6.0 Public Rights of Way

There are a number of PRoW within the study area. From a large number of these routes, the proposal will not be visible due to a well vegetated landscape where topography and vegetation would combine to screen even more views.

Nevertheless, from the closest PRoW to the site where clear views of the proposal would be available, there are already sixteen polytunnels, and therefore the proposal would not create a significant change in view for users of the PRoW.

No PRoW crosses the site for the proposed polytunnels.

In order to appraise the visual impact of the proposed development, an assessment upon significant visual receptors has been made for the closest PRoW to the site.

Primarily, the distance to the polytunnel from the visual receptor forms the initial basis for the appraisal, given the likelihood the greater the distance the lesser the impact. The sensitivity of the said receptor is then assessed in order to identify its susceptibility to the visual impact, given the varying nature of receptors. The nature of the receptor forms an essential part of this appraisal with greater susceptibility being given to the sites of historical or environmental designations.

The impact of the polytunnels proposed is then assessed through a study of the receptor and its interaction with the polytunnels which will result in predictions of the magnitude of change caused by the visual impact in relation to sensitivity.

The closest PRoW to the proposed polytunnels is located at the following:

Easting – 347184

Northing – 337085

Distance from proposed development –5 metres.

At the closest point to the development, the footpath is to the west of the development site. The sensitivity of change is reduced with the proposed polytunnels being grouped with existing agricultural buildings and polytunnels, creating a cluster of buildings all of similar design and appearance.

7.0 Landscape and Visual Impact

This section of the Design and Access Statement has examined the potential impacts of the proposed development on the landscape and visual amenity of the area. It has considered the potential direct impact on the fabric of the landscape and the potential impacts on the perception of landscape character. The assessment has also considered the potential impacts of the proposed polytunnels on visual amenity.

Overall, the assessment established that the proposed polytunnels will change the baseline conditions in terms of visual amenity. Measures factored into the site selection and design process will reduce or minimise any potential adverse effects. Therefore, on balance it is considered that the proposed polytunnels would be acceptable in this context.

Landscape impacts are changes in the landscape resource and perception of the landscape, and differ from visual impacts, which relate to the appearance of these changes and the resulting impact on visual amenity. The landscape and visual assessment is organised into the following main sections:

Baseline Assessment

The first stage of the assessment reviews the existing landscape and visual resource of the area in terms of its character, quality (i.e. condition) and sensitivity. The baseline assessment forms the basis against which the magnitude and significance of the predicted landscape and visual impact arising from the proposals are assessed. The size of the study area has also been based on the scale, context and likely visibility of the polytunnel installation.

The baseline assessment has three elements:

- Description – the process of collecting and presenting information about landscape and visual resources in a systematic manner;
- Classification – analytical activity whereby landscape resources in particular are refined into units of distinct and recognisable character;
- Evaluation – the process of attributing a sensitivity to a given landscape or visual resource, by reference to specified criteria.

The baseline assessment process comprises of three stages:

- Desk study
- Field survey
- Analysis

Desk Study

As part of the desk study, the baseline landscape and visual resource was defined and the main users of the area, key viewpoints and key features were identified. Existing map and written data about the application site and its environs within the study area were reviewed, including:

- Ordnance Survey map data
- Detailed survey data for the application site
- Plans and elevations of the proposed development.

The desk study also identified and classified potential visual receptors according to their associated land use (settlements, footpaths, roads etc). The aims of the baseline visual assessment was to ensure that a representative range of viewpoints were included in the visual assessment. The potential extent of visibility of the proposed development was identified by reference to Ordnance Survey map data and observations made in the field.

Following this, potential visual receptors likely to be affected by the proposed development were identified and a preliminary selection of viewpoints was made to ensure that the viewpoint assessment included a representative range in relation to the following criteria:

- Type of receptor – based on the above, and including different landscape character types
- Elevation
- Distance of receptor from proposed development
- Direction of the receptor from the proposed development, with the aim of achieving a distribution from different compass points around the application site.

Assessment of Residual Landscape and Visual Impacts

The impact assessment aims to:

- Identify systematically all the potential landscape and visual impact of the proposed development taking account of the proposed mitigation measures
- Predict and estimate their magnitude as accurately as possible
- Assess their significance in a logical and well-reasoned fashion.

The assessment describes the changes in the character and quality of the landscape and visual resources that are expected to result from the proposed development. It covers both landscape impacts, i.e. changes in the fabric, character and key defining characteristics of the landscape; and visual impacts i.e. changes in available views of the landscape and the significance of those changes on people.

In assessing landscape impacts, the potential direct impacts on the fabric of the landscape are considered, together with the potential impacts on the perception of landscape character. The latter depends on a number of factors:

- The nature of the landscape character type, including factors such as the nature of views and sense of enclosure
- The extent of the potential visibility of the proposed development (e.g. the number and extent of the development seen)
- The proportion of the character type with potential visibility
- The distance to the proposed development

The baseline landscape character assessment together with an assessment of the potential impacts on each character type, along with consideration of the extent of potential significant impacts on the landscape, is included in the assessment.

A visibility assessment has been carried out using Ordnance Survey data and field observations to ascertain the general extent of visibility of the proposed development within the study area. The visibility assessment has concentrated mainly on publicly accessible areas such as the road network, public footpaths, residential and outdoor recreational areas.

A viewpoint analysis has been carried out to identify and evaluate the potential impacts on, and visual amenity arising from, the proposed development at specific representative locations in the study area. The viewpoints are considered to be representative of the spectrum of receptors in the study area, located at different distances, directions and elevations relative to the proposed development.

Assessment Criteria

The aim of the landscape assessment is to identify, predict and evaluate key impacts arising from the proposed development. Identified impacts are quantified wherever possible, however the nature of landscape and visual assessment requires an element of interpretation using professional judgement. In order to provide a level of consistency to the assessment, the prediction of magnitude and assessment of significance of the residual landscape and visual impacts have been based on pre-defined criteria.

The **sensitivity of the landscape** is not absolute and varies according to the nature of the existing landscape, the nature of the proposed development and the type of change being considered. The determination of the sensitivity of the landscape resource to changes associated with the proposed development is defined as high, medium, low or negligible and is based on a professional interpretation of a combination of parameters, as follows:

- Landscape value – as reflected by local, regional or national landscape designations
- Landscape scale – which is the relative size of the main landscape elements and components
- The nature of views – whether open, closed, long or short distance, simple or diverse.

Landscape sensitivity is defined as high, medium or low as set out below:

Landscape Value	Landscape Scale	Nature of Views	Sensitivity
High	Small	Panoramic, Long Distance	High

Medium	Medium	Open, Medium Distance	Medium
Low	Large	Closed, Short Distance	Low

The **sensitivity of visual receptors** is based on an interpretation of a combination of parameters as follows:

- The location of the viewpoint
- The context of the view
- The activity of the receptor
- Frequency and duration of the view

Visual receptor sensitivity is defined as high, medium, low or negligible as follows:

High Sensitivity	e.g. users of outdoor recreation such as rights of way or communities where the development would result in changes in landscape setting or valued views
Medium Sensitivity	e.g. people travelling through past the affected landscape
Low Sensitivity	e.g. people at their places of work
Negligible	e.g. views from heavily industrialised areas

Impact magnitudes for visual impacts are classified as being high, medium or low magnitude according to the following criteria:

- The scale of change in the view with respect to the loss or addition of features in the view and changes in its composition including the proportion of the view occupied by the proposed development
- The degree of contact or integration of any new features or changes in the landscape with the existing or remaining landscape elements and characteristics
- The duration and nature of the effect, whether temporary or permanent, intermittent or continuous intermittent or continuous
- The angle of view in relation to the main activity receptor
- The distance of the viewpoint from the proposed development
- The extent of the area over which the changes would be visible.

The IEMA guidelines state that the significance is not absolute and can only be defined in relation to each development and its location. The two principle criteria determining significance are the scale or magnitude or effect of the environmental sensitivity of the location or receptor. A higher level of significance is generally attached to large scale effects and effects on sensitive or high value receptors; thus small effects on highly sensitive sites can be more significant than large effects on less sensitive sites (IEMA, 2002). Definitions of magnitude are given within the Guidance for Landscape and Visual Impact Assessment (3rd Edition 2013). The table below provides the definitions of magnitude used for the purposes of this assessment:

Level of Magnitude	Definition of Magnitude
Substantial	Total loss or major alteration to key elements/features/characteristics of the baseline (pre-development) conditions such that post development character/composition of baseline would be fundamentally changed.
Moderate	Partial loss or alteration to one or more key elements/features/characteristics of the baseline (pre-development) conditions such that post development character/composition/attributes of baseline would be partially changed.
Slight	Minor loss of or alteration to one or more key elements/features/characteristics of the baseline (pre-development) conditions. Change arising from the loss/alteration would be discernible but underlying character/composition of the baseline condition would be similar to pre-development circumstances/patterns.
Negligible	Very minor loss or alteration to one or more key elements/features/characteristics of the baseline (pre-development) conditions. Change barely distinguishable, approximating to the 'no change' situation

The significance of any identified landscape or visual impact has been assessed as major, moderate, minor or no impact. These categories have been determined by consideration of the landscape or visual sensitivity and the predicted magnitude of change as described above.

Landscape and Visual Sensitivity	Magnitude of Change			
	Substantial	Moderate	Slight	Negligible
High	Major	Major/moderate	Moderate	Moderate/minor
Medium	Major/moderate	Moderate	Moderate/minor	Minor
Low	Moderate	Moderate/minor	Minor	Minor/none
Negligible	Moderate/minor	Minor	Minor/none	None

Where the landscape or visual impacts have been classified as Major or Major/moderate, this is considered to be a significant impact referred to in The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. It should be noted that significant impacts need not be unacceptable or necessarily negative and may be reversible. The potential impacts associated with the proposed development are referred to as adverse, neutral or positive where applicable.

The matrix is not used as a prescriptive tool, and the methodology and analysis of potential impacts at any particular location must make allowance for the exercise of professional judgement. Thus, in some instances, a particular parameter may be considered as having a determining impact on the analysis.

Limitations of the Assessment

Given the degree of subjectivity inherent in landscape and visual assessments, there are no methods to quantify effects. As such, the following assessment relies on professional judgements and experience.

7.1 Landscape Impact Assessment

The proposal is for the erection of polytunnels on land which is currently used for agriculture. The polytunnels provide the benefits of crop protection, extending the growing season by protecting the crops from inclement weather, widening the variety of crops grown and providing some protection against pests and diseases, thus reducing the need to spray fungicides and other crop protection chemicals. Polytunnels also enable an uninterrupted growing season in reasonable working conditions.

7.1.1 Ecology, Hydrology and Archaeology

The proposed development site is not located within an area designated for ecological or biodiversity preservation. The land surrounding the proposed development is typified by arable use and existing polytunnels.

The proposed development for the polytunnels will have no detrimental effect to wildlife or the surrounding ecology as the area is already a highly intensive agricultural piece of land, and therefore the ecological and biodiversity benefit of this ground would be minimal.

There are no Scheduled Ancient Monuments within the site boundary.

7.2 Landscape Context

The immediate locale is a predominately agricultural setting. The surrounding land use is agriculture which mainly comprises of permanent pasture or arable fields.

In terms of man-made influence, the dominant visual references ads and in the locality are the many modern agricultural buildings and taller residential buildings in local settlements.

The existing landscape context has been heavily influenced by the intervention of human activities. Primarily in the locality, the landscape is made up of field boundaries, shelter belts, farmsteads and access roads all contributing to the landscape.

7.3 Landscape Character Assessment (LCA)

The LANDMAP classifications for the proposed polytunnels location are as follows:

	Area Unique ID	Area Name	Classification/Evaluation
Geological Landscape	WRXHMGL126	Bettisfield – Isycoed Park	Lowland hills and valleys/Moderate
Cultural Landscape	WRXHMCLS083	English Maelor	Lowland/Moderate
Historic Landscape	WRXHMHL034	Bettisfield	Irregular fieldscapes/High
Landscape Habitats	WRXHMLH057	Fenns Moss	Mosaic/Outstanding
Visual and Sensory	WRXHMVS040	English Maelor	Rolling Lowland/Moderate

7.3.1 Character Area

	Area Name	Classification/Evaluation	Key Features
Geological Landscape	Bettisfield – Isycoed Park	Lowland hills and valleys/Moderate	No regionally significant sites/ landforms noted during present survey and geology/ geomorphology considered to be typical of feature/ process and is either widespread, better exposed elsewhere or not currently known to be exceptional.
Cultural Landscape	English Maelor	Lowland/Moderate	In terms of the North Wales context the traditional rolling farmland - of a distinctly "English" character is unusual, as is the relative lack of large scale settlements and industrial/commercial developments.
Historic Landscape	Bettisfield	Irregular fieldscapes/High	Undulating lowland with predominantly small irregular fields probably of medieval and later origin with ancient hedges and modern post-and-wire fences, including some small isolated areas of enclosed former strip field cultivation... Widely dispersed larger farms of medieval and later origin, some based on medieval manors... Early settlement and land use suggested by a possibly later prehistoric enclosed farmstead... Marl pits scattered across the area, now generally visible as ponds.
Landscape Habitats	English Maelor	Rolling Lowland/Moderate	The Fenn's Moss site is highly valued ecologically as an example of mire development occurring under relatively warm and dry conditions and lying at the southern edge of the British range for this type of habitat. It is of outstanding value. It really requires a buffer of wet grassland to maintain sufficiently wet conditions within the main part of the site.

7.4.2 Summary

Views across the landscapes of these LCAs are variable. Due to topography, views out of the LCAs are generally available across long distances. However, given the rather linear nature of the valet and the relatively good levels of vegetation within the LCA, views across the LCA itself are generally limited.

Within this part of topography again plays a role in limiting views across the LCA, this time in association with mixed woodland, conifer plantations and general vegetation in shelter belts, hedgerows and hedgerow trees.

The application would have a minor impact on the defining characteristics of the landscape and would contrast with the existing character, although none of the existing key characteristics or distinctive features listed in the Landscape Character Assessment would be lost or changed.

7.5 Landscape Visual Impact

7.5.1 Visual Character

LANDMAP confirms that the proposed site is within the English Maelor, Rolling Lowland (Evaluation: Moderate) Visual and Sensory aspect area. The area is summarised as an attractive archetypal rolling farming landscape with elements of estate farming and a pleasant mix of small to medium field patterns and woodland blocks and copses. There is gentle variation in topography, with small wooded valleys, and higher areas overlooking Dee valley. Subtle differences, shown by CPAT assessment of Maelor Saesneg (2003). Main land use is agriculture with the emphasis on dairy farming, some arable. Field boundaries are generally well defined with mature hedges and hedgerow trees (-often oaks) and small lanes. The area feels relatively settled and safe with a low proportion of out of scale or modern development. The area forms the southern and eastern border of the county and therefore the Welsh/English border. Visually and physically the area feels far more closely associated with the English landscape of North Shropshire and Cheshire than the "typical" or "archetypal" Welsh landscape,

with the result that the area feels quite separate from the remainder of the county and country and is an uncommon landscape type for Wales. The aspect is the transition zone and border between England and Wales.

7.5.1.1 Settlements

There are no locations where the visibility of the proposed development could possibly result in a significant change in the view for residents. In parts of villages, there are locations where the proposal would be only partially visible if at all and no significant change in the view would be predicted due to the distance from the proposal.

7.5.1.2 Individual Properties

There are a number of individual residential properties located outside of settlements. Many of these properties are well vegetated, such as some of the properties located along the minor road that follows the C roads around the area.

However, some properties have a more open aspect and are located within approximately 1km of the proposed development. Where residents within these properties would gain clear views of the proposed development, then their sensitivity to change is evaluated as medium, whilst the magnitude of change is evaluated as slight. The predicted effect overall to these properties is therefore moderate/minor. Fieldwork has found that the number of properties with clear views would be very limited due to local topography and the well vegetated nature of the landscape.

7.5.1.3 Public Rights of Way (PROW)

There are a number of PROW within the locality. No potential visibility of the proposal would be available from a large number of these routes. Furthermore, fieldwork has shown that this is a well vegetated landscape where topography and vegetation would combine to screen even more views.

Nevertheless, from some PROW proximate to the site, such as those within approximately 1km of the proposed development, where clear views of the proposal would be available, a significant change in the view of these receptors would occur.

7.5.1.4 Public Highways

The main routes through the area are the A495, A41, A49 and B5063.

- A495 – located approximately 890m from the proposed development at its closest point. The closest parts of the route to the proposed development are located where limited visibility of the proposal would occur due to roadside hedgerows and vegetation. From consistent distances of over 1km away along this fastmoving route, the proposed development would not be seen due to vegetation and hedgerows.
- A41 – located approximately 8.3kms from the proposed development at its closest point. No visibility of the proposal due to distance and vegetation.
- A49 – located approximately 8.4kms from the proposed development at its closest point. No visibility of the proposal due to distance and vegetation.
- B5063 – located approximately 3.7kms from the proposed development at its closest point. No visibility of the proposal due to distance and vegetation.
- Local class C roads within the area are considered to have negligible sensitivity to change due to their limited use, largely by local residents.

It is unlikely that there would be any significant effects on the visual amenity of residents in other settlements in the area, of visitors to leisure and recreational facilities, of walkers, equestrians and cyclists on other definitive rights of way, or of motorists on any of the A, B or minor roads in the area.

7.5.2 Visual Appraisal

In order to appraise the visual impact of the proposed polytunnels, an assessment upon significant visual receptors has been made.

Primarily, the distance to the polytunnels from the visual receptor forms the initial basis for the appraisal, given the likelihood the greater the distance the lesser the impact. The sensitivity of the said receptor is then assessed in order to identify its susceptibility to the visual impact, given the varying nature of receptors. The nature of the receptor forms an essential part of this appraisal with greater susceptibility being given to the sites of historical or environmental designations.

The impact of the polytunnels proposed is then assessed through a study of the receptor and its interaction with the polytunnels which will result in predictions of the magnitude of change caused by the visual impact in relation to sensitivity.

Location	Easting Northing	Distance (m)	Fieldwork observations	Visual Receptors	Sensitivity	Magnitude of Change	Overall Effects
Footpath north of Fields Farm	347176 337385	175m	The proposed polytunnels will be visible from this location. However they will be seen in the same context as the existing polytunnels and part of the wider view.	Walkers	Medium	Moderate	Moderate
A495	346398 337548	875m	The polytunnels will not be visible from this location due to distance and intervening vegetation	Motorists	Low	Negligible	None
Cambrian Cottage	347482 336419	620m	The proposed polytunnels will be slightly visible from this location. However they will be seen in the same context as the existing polytunnels and as part of the wider view.	Residents	Medium	Moderate	Moderate
Footpath south of Yew Tree Farm	347992 337454	680m	The polytunnels will be slightly visible from the location due to the topography and vegetation.	Walkers	Low	Negligible	None
Stimmy Farm	347413 337992	800m	The proposed polytunnels will be slightly visible from this location. However they will be seen in the same context as the existing polytunnels and as part of the wider view.	Walkers Residents	Low	Negligible	None

7.5.3 Summary

The site has been designated as agricultural land. Within this context polytunnels of the size proposed could be expected to have a limited and acceptable impact on the nature of the surrounding landscape, especially when located adjacent to the existing farmstead.

It is considered that the visual impact of the polytunnels on the surrounding wider landscape would not be detrimental to its existing landscape quality or character. The majority of the public views will be from a relatively long distance of around a kilometre. At such distances the appearance of the polytunnels would reflect the character of the wider landscape that already contains similar structures.

8.0 Cultural Heritage Assessment

Legislation relating to archaeology and to scheduled ancient monuments is contained in the Ancient Monuments and Archaeological Areas Act 1979.

Legislation regarding buildings of special architectural or historic interest is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990.

Section 66 of the 1990 Act is of relevance in that it states that special regard must be given by the decision maker in the exercise of planning functions to the desirability of preserving a listed building and its setting. Section 72 of the 1990 Act provides protection for the character and appearance of conservation areas.

A search area of 2km was chosen given the relative modest size and scale of the proposal.

There are no known designated cultural heritage assets located within the site application boundary. Therefore, there will be no predicted direct impacts arising from the proposed development on designated cultural heritage receptors.

8.1 Scheduled Ancient Monuments

There are two SAMs located within 2km of the application site:

Reference	Name, Location	Overall Effect
FL100	Haulton Ring Moated Site	Due to existing polytunnels being located between the SAM and the site for the proposed polytunnels, the proposed development would not impact on the setting or harm its cultural heritage significance
FL182	Peat Processing Works Fenn's Moss	Due to the separation distance, intervening vegetation and built development, the visibility of the polytunnels would be limited. In this regard the proposed polytunnels would not impact on the setting of the SAM or harm its cultural heritage significance.

8.2 Listed Buildings

There are 16 listed buildings within 2kms of the application site:

Name, Grade	Type, Description of Significance and Contribution of Setting to Significance	Overall Effect
Fenn's Moss Peat Processing Works, Grade II*	Listed grade II* as an exceptionally rare surviving peat processing works, retaining its original machinery and within a well-preserved historic landscape. Scheduled Ancient Monument FL182.	Due to the separation distance and intervening vegetation, the visibility of the polytunnels will be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
Cornhill Bridge (Bridge No 47, Llangollen Canal), Grade II	Listed as a well-preserved canal overbridge of a type characteristic of the late C18.	Due to the separation distance, intervening vegetation and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
Bettisfield Hall, Grade II*	Listed grade II* for its special architectural interest as a C17 gentry house, of unusual layout and proportions, notable as an early brick house and retaining much of its original character and construction following many additions and repairs.	Due to the separation distance, intervening vegetation and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
Lych gate at Church of St John the Baptist, Grade II	Listed as a fine Gothic Revival lych gate and an integral component of the parish church.	Due to the separation distance, intervening vegetation, built development and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not

		impact on the setting or harm its cultural heritage significance.
Bettisfield War Memorial, Grade II	Listed for its social-historical interest and as a fine war memorial contributing to the historical integrity of the parish church.	Due to the separation distance, intervening vegetation, built development and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
Church of St John the Baptist, Grade II*	Listed grade II* for its special architectural interest as a Gothic Revival church by a major C19 architect, and distinguished by its expressive exterior and complete interior scheme.	Due to the separation distance, intervening vegetation, built development and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
Lane Farmhouse including attached garden wall, Grade II	Listed for its special architectural interest as an early C19 farmhouse retaining definite early character.	Due to the separation distance, intervening vegetation, built development and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
Top Lodge, Grade II	Listed as a lodge retaining C19 character in a prominent position, and for its contribution to the overall historical integrity of buildings at Bettisfield Park.	Due to the separation distance, intervening vegetation, built development and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
Kitchen garden walls, including former vine house, greenhouses and bothies at Bettisfield Park, Grade II	Listed as mostly well-preserved C19 garden walls and associated buildings of a distinctive architectural character, including rare surviving C19 greenhouses and fine detail to the vine house, making an important contribution to the strong group of service buildings at Bettisfield Park.	Due to the separation distance, intervening vegetation, built development and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
Boundary wall and gateway to NE side of Bettisfield Park, Grade II	Listed as a prominent structure that contributes to the overall historical integrity of buildings at Bettisfield Park.	Due to the separation distance, intervening vegetation, built development and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
Bettisfield Park, including attached garden walls, Grade II	The surviving portion of Bettisfield Park is listed grade II* as a substantial and well restored C18 country house, which is especially notable for its fine interior detail.	Due to the separation distance, intervening vegetation, built development and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
Revetment and balustrade to forecourt and formal garden of Bettisfield Park, Grade II	Listed as a C19 garden feature of definite historic character, and for its contribution to the setting of the house.	Due to the separation distance, intervening vegetation, built development and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
Water tower at Bettisfield Park, Grade II	Listed for its special interest as an unusual form of outbuilding and of definite C19 architectural	Due to the separation distance, intervening vegetation, built development and

	character, contributing to the strong group of service buildings at Bettisfield Park.	topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
Onion tower and attached walls at Bettisfield Park, Grade II	Listed, notwithstanding partial rebuilding, as a building of definite C19 character and contributing to the strong group of service buildings at Bettisfield Park.	Due to the separation distance, intervening vegetation, built development and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
The Stables at Bettisfield Park, Grade II*	Listed grade II* as an imposing stable and coach house block well converted to domestic accommodation, the centrepiece of the C18 and C19 service buildings at Bettisfield Park.	Due to the separation distance, intervening vegetation, built development and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.
Farm buildings at Bettisfield Park Home Farm, Grade II	Listed as a fine group of estate-sponsored farm-buildings, skilfully planned to accommodate a range of uses with a clear hierarchy on a sloping site, and with some striking architectural detail. The group includes some unusual survivals - notably horse-engine house and smithy.	Due to the separation distance, intervening vegetation, built development and topography, the visibility of the proposed development would be limited. In this regard the proposed polytunnels would not impact on the setting or harm its cultural heritage significance.

8.3 Registered Park and Gardens




There are no Grade II Registered Parks and Gardens located within 2km of the proposed site.

9.0 Policy Context

9.1 Analysis of Planning Policy against Maelor Forest Nurseries Proposals

The purpose of this section is to provide an overview of how the proposed polytunnels at Maelor Forest Nurseries ‘fits’ with the European, National, Regional and Local agricultural policy and legislative framework.

The chapter is structured around the hierarchical policy framework of:

-  National agricultural strategy and planning policy guidance;
-  Regional agricultural strategy and regional spatial strategy; and
-  Local development plans.

The aims and objectives of these policies and plans broadly centre on the principles and practice of ‘sustainable development’. The extent to which policies at the regional and local levels are being achieved is important to the delivery of the Government’s sustainable development objectives (Planning Support Statement 1 (PPS1)).

The section concludes with an overview of the proposed development in the context of the key policy messages.

9.2 National Planning Policy

Planning Policy Wales (Edition 10, December 2018) – Chapter 5 Productive and Enterprising Places

The Welsh Assembly Government states that;

For planning purposes the Welsh Government defines economic development as development of land and buildings for activities that generate wealth, jobs and incomes. Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism and public services. The constructions and energy sectors are also important to the economy and are sensitive to planning policies.

Local planning authorities are required to ensure that the economic benefits associated with a proposed development are understood and that these are given equal consideration with social and environmental issues in the decision-making process, and should recognise that there will be occasions when the economic benefits will outweigh social and environmental considerations.

Local planning authorities should adopt a positive approach to development associated with farm diversification in rural areas, irrespective of whether farms are served by public transport. While initial consideration should be given to adapting existing farm buildings, the provision of a sensitively designed new building on a working farm within existing farm complexes may be appropriate where a conversion opportunity does not exist.



Local planning authorities should adopt a constructive approach towards agricultural development proposals, especially those which are designed to meet the needs of changing farming practices or are necessary to achieve compliance with new environmental, hygiene or welfare legislation. In addition they should adopt a positive approach to the conversion of rural buildings for business re-use.

Technical Advice Note (TAN) 6

TAN 6 – Planning for Sustainable Rural Communities (July 2010) recognises the need to allow for sustainable economic development. The Government’s objectives outlined in TAN 6 broadly are:-

The purpose of this TAN is to provide practical guidance on the role of the planning system in supporting the delivery of sustainable rural communities.

The TAN provides guidance on how the planning system can contribute to:

-  Sustainable rural economies;
-  Sustainable rural housing;

Planning authorities should support the diversification of the rural economy as a way to provide local employment opportunities, increase local economic prosperity and minimise the need to travel for employment. The development plan should facilitate diversification of the rural economy by accommodating the needs of both traditional rural industries and new enterprises, whilst minimising impacts on the local community and the environment.

The Welsh Assembly Government's objective is a sustainable and profitable future for farming families and businesses through the production and processing of farm products while safeguarding the environment, animal health and welfare, adapting to climate change and mitigating its impacts, while contributing to the vitality and prosperity of our rural communities. The planning system can play an important part in supporting the future sustainability of agriculture.

Technical Advice Note (TAN) 23

1.1.2 In the full context of PPW, therefore:

- Economic development is development (new or change of use) where the resulting space will be occupied by economic activities;
- An economic activity, or economic land use, is an activity which directly generates wealth (output), jobs and income;
- Generating jobs includes providing or sustaining existing jobs as well as creating jobs.

1.1.4 PPW advises that economic land uses include the traditional employment uses (Class B in the Use Classes Order) as well as retail, tourism and public services. This list is not exhaustive and amongst other activities, economic land uses also include agriculture, energy generation and other infrastructure. However, non B class uses and activities are subject to many separate policies and considerations set out in PPW and Technical Advice Notes (TANs), which in some cases will take precedence over the more general principles in PPW Chapter 7 and in this TAN.

1.2.5 Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development.

2.11 It should not be assumed that economic objectives are necessarily in conflict with social and environmental objectives. Often these different dimensions point in the same direction. Planning should positively and imaginatively seek such 'win-win' outcomes, where development contributes to all dimensions of sustainability.

1.1.3 There are two kinds of special contribution that are particularly relevant to rural development. Firstly, an economic development could make communities more sustainable, by improving the alignment of housing and jobs, encouraging people to work close to home. Secondly, the needs of established businesses or clusters may be very specific. When businesses expand or modernise, they may need to do so in situ; it may be highly inefficient or impracticable for them to relocate to a sequentially preferable site. Similarly new businesses aiming to join existing clusters may need to be close to existing businesses if they are to derive the benefits.

9.3 Local Planning Policy

Policy Framework Overview

Examination of the current policy and legislative framework demonstrates that there is an acceptance that agricultural diversification and expansion has a continuing role in the rural area. The proposals are consistent with policies and objectives.

Wrexham Unitary Development Plan 1996-2011

Policy GP1 General Development Principles

Criteria of the above policy:

- 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.
- c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources.

- d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.
- e) Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible.
- 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.
- g) Secure public services (e.g. gas, water, electricity) to development at minimum public cost.
- h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.
- i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site.
- j) Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity from development that could harm this identity.
- k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.

Policy EC3 Agricultural Buildings

The construction of new agricultural buildings will be permitted unless the development is materially detrimental in terms of its impact on the environment or surrounding landscape. The development should form part of an existing farm complex and take advantage of topography and other landscape features for screening. Isolated buildings will only be permitted in exceptional circumstances where there is an essential agricultural need, and no reasonable alternative location for the development.

Therefore the proposed polytunnel development would not cause any unacceptable adverse effects on Wrexham's landscape as it has been carefully sited and designed to minimise the impact on the landscape through being grouped with existing agricultural buildings.

Policy EC4 Hedgerows, Trees and Woodland

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

The proposed polytunnels at Maelor Forest Nurseries are positioned alongside existing agricultural buildings which provide a screen to the development, and as such the development would be seen in the same context as the farmstead. It is not proposed that any hedgerows or trees will be removed for the development. Habitats on site are generally of low value given the intensive use of the site for agriculture, and therefore the value of the site is found to be limited.

Landscape Character Area Supplementary Planning Guidance (SPG)

The site falls within the Landscape Character Area 13b – English Maelor, an area of undulating lowland farmland and small villages which retains evidence of historic landscapes and of alternating English and Welsh influence.

9.4 Access Statement

Explain the adopted policy or approach to inclusive design and how policies relating to inclusive design in development plans and relevant local design guidance have been taken into account?

Access by Disabled Persons

Applications will be permitted for the development of new buildings, public amenities, recreational spaces and, where practicable and reasonable, the changes of use or alterations to existing buildings, where suitable access is made to and within the building or amenity and adequate facilities are provided for people with disabilities.

The Disability Discrimination Act 1995 (DDA) seeks to avoid discrimination against people with impairments and disabilities and for instance ensures that work premises do not disadvantage someone with a disability.

The access arrangements have adopted an inclusive approach and aims to ensure that all users will have equal and convenient access to the site and buildings.

Explain how any specific issues, which might affect people's access to the development have been addressed?

The design of the application will have full consideration for ease of access for disabled pedestrian use. Our full application submitted incorporates the following points:-

- 1) All construction work to comply (where relevant) to Part M of the Building Regulations Act 2000, and also subsequent amendments.
- 2) All doors to be of disabled criteria.
- 3) All external doors to be 930mm minimum width.
- 4) All washing facilities are located on the same level (ground level).
- 5) Parking facilities will allow level access to the proposed development.

The car parking facilities and access ways will be flat and even and unobstructed allowing the building to be accessed by all people including disable people or people with impairments.

Detail how features, which ensure people's access to the development, will be maintained?

The car parking facilities and access ways to and from the buildings will be maintained in such a way as to allow all people access to the buildings.

All of the measures detailed above will be maintained in such a way that will allow all people access to/from and around the buildings. Also the facilities within the building will also be constructed and maintained in such a way to ensure people's access within the development.

9.5 Community Safety

Site security is critical throughout day and night to prevent the theft of equipment and livestock, which may injure or adversely affect the welfare of animals. This is critical in this case given the immediacy to the local village and its proximity to the public highway. Community Safety will be provided by pedestrian surveillance of the polytunnels as currently practised on the existing holding. As Maelor Forest Nurseries is an agricultural unit there is always staff on hand 24 hours per day to ensure security.

9.6 Environmental Design Statement

A design statement shall accompany all detailed applications and will describe the actions taken to design and adapt the development to fit its location. Wherever practicable, developments shall be designed to reduce energy consumption and maximise energy conservation and maximise energy conservation through use of appropriate materials, design, layout and orientation.

Normally, because these buildings are over 1000m² the development would need to meet BREEAM 'Very Good' standard and achieve the mandatory credits for 'Excellent' under Ene 1 – reduction of CO₂ Emissions.

This planning application has taken into consideration the following energy efficiency measures and technologies that can be incorporated alongside wider energy efficient design principles to ensure high energy performance.

The proposed buildings have been positioned and orientated (as far as possible) in order to maximise the use of natural daylight and solar energy. This is achieved where possible by orientating the building in such a way to maximise the potential for solar gain by reducing the need for energy consumption.

The buildings will benefit from natural ventilation and all rainwater will be harvested and recycled.

Wherever possible materials will be sourced and produced locally and will come from a source that can be renewed without harm to the environment. High quality reclaimed materials can save resources and may also provide a better match with

the surrounding development. The scheme will avoid the use of tropical hardwood and look for timber which is certified as coming from sustainable sources.

The site is serviced by both private and mains water and mains electricity. Rainwater from the roofs of the proposed buildings will be collected and stored in the proposed water storage tower and will then be recycled.




The development of this land will contribute to the aim of sustainability through the productive use of the above mentioned features.

The above points will ensure that the buildings are 'sustainable' in terms of the buildings design and the supply and use of energy in accordance with the Council's recommendations.

Other complimentary measures:-

We have considered that energy efficient design principles are also key to the success of schemes including if electricity is required to be supplied to the building that energy efficient light bulbs are used.

We also aim to:-

-  Design out waste from the outset;
-  Minimise the energy used during the construction phase of the development through careful project planning;
-  Use reusable and recycled materials.

Physical Context of the Development

The proposed site for the poultry unit consists of an arable field at land at Mulsford Farm which is located adjacent to the existing range of farm buildings. The development site is surrounded at all points of the compass by mature boundary hedgerows and tree plantations forming a natural screen. Further landscaping is proposed in order to further improve the screening.

The proposed development is located on the owner occupied land.

The proposed site is surrounded by agricultural land which is within the control of the Applicant.

10.0 Social Context of the Development

The scale and type of the proposed polytunnels will be in keeping with the existing range of farm buildings on site and other agricultural buildings within Wrexham as can be seen by the plans submitted.

The size and position of the proposed polytunnels are to be agreed with the County Council, but we strongly believe the most suitable site has been chosen to reflect both ease of access to the site, landscaping and adherence with the planning policies of the Council, particularly with regard to their position adjacent to existing farm buildings.

11.0 Economic Context of the Development

The Council wishes to sustain an efficient and viable farming economy and is aware of the need for continuing investment in modern farm buildings. Farm businesses need to change and grow in response to market forces and legislation if they are to survive.

A fundamental argument in favour of polytunnels is the economic benefit which results in the production of high value goods. The use of polytunnels shows how the agricultural sector can achieve significant growth and productivity gains through the use of these new growing techniques.

It is no longer realistic or economic to grow crops in the UK climate to the standards of reliability and quality demanded without tunnel protection. UK consumers are now demanding a reliable, year-round supply. Where crops are grown in the open air, production is unpredictable due to rainfall. Poly tunnel growing enables a longer and better quality supply.

The tree growing industry is labour intensive. More staff are taken on where polytunnels extend the growing season and can be employed for longer parts of the year than was previously the case before the introduction of tunnel growing. Therefore contribution is made to the local economy by spending money in local shops and businesses and making use of local services.

The proposed development would accord with the requirement in Planning Policy Wales to support economic growth and the guidance in Planning Policy Wales has to be taken into consideration:

‘Local planning authorities are required to ensure that the economic benefits associated with a proposed development are understood and that these are given equal consideration with social and environmental issues on the decision making process, and should recognise that there will be occasions when the economic benefits will outweigh social and environmental considerations.’

We would also point you to the policy support in Technical Advice Note 23 – Economic Development.

12.0 Conclusion

It is clear that, in most cases, even without mitigation, impacts are generally insignificant. This has been achieved by appropriate location and design of the proposed polytunnels. Even where significant impacts are identified many are effectively reduced to insignificant by the use of appropriate mitigation. Indeed, in some areas, negative impacts are altered to positive impacts via the application of mitigation and enhancement measures (particularly in relation to traffic and ecology). There are no impacts that remain significantly negative.