



Glandŵr Cymru
Canal & River Trust in Wales

Wrexham County Borough Council
The Guildhall
16 Lord Street
Wrexham
LL11 1AY

Your Ref P/2022/1080

Our Ref CRTR-PLAN-2023-37982

Friday 27 January 2023

Dear Mr Philips

Proposal: Construction of new access road, lorry park, weighbridge and building, car park, facilities block, roundwood storage areas, 132 KV Substation and ancillary works

Location: Kronospan Ltd, Holyhead Road, Chirk

Waterway: Llangollen Canal

Thank you for your consultation.

We are the charity who look after and bring to life 109 miles of canals in Wales. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of Wales. The Trust is known as Glandŵr Cymru, the Canal & River Trust in Wales and we are a statutory consultee in the Development Management process.

Based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended)) is that the Trust **asks that the Council carefully considers the proposals in terms of the potential wider impact on the setting of the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS) and its Outstanding Universal Value.** Our advice and comments follow:

The Trust own and manage the Llangollen Canal and associated infrastructure which passes to the west of the site where the development is proposed. The canal corridor is within the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS) which was inscribed in 2009. The site the subject of this application is within the buffer zone to the WHS. The canal is also a Scheduled Ancient Monument (SAM). The majority of the WHS and its buffer zone are also within the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB). There is a railway line and tree/hedgerow lined fields on the intervening land between the canal and site of the proposed lorry park and associated development. The canal is within a treelined cutting for a large part of the wider site boundary with Kronospan, towards where the development is proposed there are however some filtered views through the vegetation towards the site from the canal corridor.

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Our following comments are split between the potential impact on the canal corridor adjacent to the site and the impacts on the wider World Heritage Site. The Trust are the principal landowner and custodian of the WHS and the body with responsibility for the canal and the majority of its structures and assets.

Potential impacts on the Llangollen canal adjacent to the site

The proposed lorry park and associated works would be set approximately 70m from the canal corridor and as such would not have any direct impact on the structural integrity of the canal infrastructure or its operation. As part of the mitigation planting an area of woodland would be planted within a field next to the canal as shown on the Illustrative Landscape Masterplan, it is unlikely that the roots from the planted trees would have any long-term impact on the stability of the canal. It may however be appropriate for the trees planted closest to the canal corridor to include some form of root guard to prevent them penetrating the clay lining of the canal and cause associated seepage and potential stability issues.

It is understood that the tallest structure on site would be the 9m high weighbridge (as shown on the elevations) and light columns which would be 8m high. A Landscape and Visual Impact Assessment (LVIA) is included in the application details and shows that viewpoints from the canal corridor have been considered and assessed. Indeed, this includes viewpoint K, J, M, N and T of these only minor views from J and T near the marina are possible towards the site. These viewpoints demonstrate that only minor filtered views would be possible in the winter months when trees are not in leaf. The LVIA chapter in the Environmental Statement concludes the development would have a short term visual impact (albeit minor and filtered from around Chirk Marina). It is proposed that this impact will be all but mitigated by the landscape planting when established.

The site would be operational 24/7, however based on the lighting assessment this would appear to demonstrate that there would be no adverse impact on the canal users or wildlife commuting along the corridor and nearby habitats. However if the Council are minded to approve the application it may be appropriate to include a **condition** requiring post-development light monitoring to ensure the proposals are accurate and that lighting would be contained within the application site. Bats are very susceptible to lighting and protected bat species are known to be present along the canal corridor. It is noted that the package of assessments does not include the completion of any bat surveys, but instead a precautionary approach has been taken. The details also set out that Natural Resources Wales (NRW) have advised that the proposed development is not likely to harm or disturb bats.

The noise chapter of the Environmental Statement and studies appear comprehensive and have been updated since the pre-application stage to include canal users as a receptor (R7) to noise, especially associated with live aboard boaters, at Chirk marina (although not owned or managed by us) or boaters in general. The submitted assessment concludes that as receptor R7 is further away than R3 (Afon Bradley Farm) that the noise and vibration impacts would be lower and no harm envisaged. We are not necessarily convinced by this argument as the acoustic properties between a canal barge and brick/mortar property would be very different.

In terms of flooding and drainage, it is understood that drainage would be attenuated on site and discharged to the existing brook/stream which passes through the site. Subject to that being the final drainage strategy this would be acceptable to the Trust as it would have no impact on the canal. We note that the flood risk assessment concludes that the canal is 70m from the site and at a lower level than the site and as such not a flood risk and we would concur with this assessment.

In conclusion, in terms of the direct impact on the Llangollen canal, it is unlikely that the proposed development would have a demonstrable direct adverse impact in our capacity or raise substantive concerns as a statutory consultee.

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Woodland management

The Trust own and manage a narrow corridor of woodland associated with the canal cutting adjacent to the site which forms part of the buffer/screen of the development site (and existing complex of buildings/structures within the Kronospan site).

Much of the wider mitigation of the impacts of the development rely on woodland planting and management within the wider landscape. Given the success of the landscape planting is integral to minimising the potential impact of the development, it is critical that the woodland is managed in the long term. This would include the existing tree stock and the proposed new planting. The application details set out that a Woodland Management Plan will be produced which will include woodland along Llangollen Canal corridor, within our landownership. The Plan would be envisaged to include:

- Selective removal of old/decaying tree cover along the canal cuttings.
- Replacement planting with new native species.
- Management of the woodland (including any new planting) to maintain existing levels of visual screening, to enhance biodiversity, to ensure the safety of canal users, and to maintain the stability of the canal structures and earthworks. (The plan would cover a 25 year period)

If approved the application will be subject to a s106 requirement for a Woodland Management Plan to be produced and agreed. In principle including the treed lined canal cuttings adjacent to the application site within a management plan would be acceptable, however this would depend on the details of the management plan and the mechanism contained within it to ensure the tree works and any replacement planting on our land would be acceptable to the Trust and our operational requirements and statutory duty. As the Trust's land may potentially be included within the Plan we would be required to be a signatory to the s106, as a charity we would expect our legal costs to be met in relation to this and we would require such an undertaking of costs to be agreed.

In any case and notwithstanding the production of a Woodland Management Plan we consider that all the proposed landscaping works should be covered by a Landscape and Ecology Management Plan (LEMP) to ensure that the planting establishes, survives and thrives.

Wider world heritage site impacts and concerns

As set out above the canal corridor is within the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS) which was inscribed in 2009. The application site is within the buffer zone of the WHS and as such within its setting. To be included on the World Heritage List, sites must have Outstanding Universal Value (OUV), the site needs to be carefully managed over the long-term to maintain this status. Development within the WHS and its buffer zone therefore also needs to be carefully managed to retain what is important about protecting the OUV of the World Heritage Site and its setting.

We note that since the pre-application stage the updated UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context document 2022, has now been considered and assessed retrospectively within the documentation in relation to this development.

The buffer zone to the WHS has a value in its own right as it creates a sense of arrival and requires protection relating to its setting and to significant views. Setting includes *'the surroundings in which a historic asset is understood, experienced and appreciated, embracing past and present relationships to the surrounding landscape'* ([Best-practice guidance | Cadw \(gov.wales\)](#)). Importantly for the Pontcysyllte Aqueduct and Canal World Heritage Site, setting relates to how a site was intended to fit into the landscape, the views from it, and how the site is seen from the surrounding area.

To date development within Kronospan has been contained within the existing footprint of the industrial use present when the World Heritage Site was first established. This application represents the first significant

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expansion of the Kronospan site onto greenfield land within the WHS buffer zone. Although the economic case for such an expansion is no doubt compelling due regard and consideration has to be given to the potential impact such major development could potentially have on the status of the World Heritage Site designation and the threat of such status being revoked. We would ask that the Council carefully considers this matter within the decision making process to ensure that such development is fully justified within the WHS buffer zone.

For us to monitor effectively our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Tim Bettany-Simmons MRTPI
Area Planner & Special Projects

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