

Planning
Wrexham County Brough Council

Sent by email

Eich cyfeirnod
Your reference

P/2022/1080

Ein cyfeirnod
Our reference

Dyddiad
Date

30 August 2023

Llinell uniongyrchol
Direct line

0300 025 6007

Ebost
Email:

Cadwplanning@gov.wales

Dear Sir / Madam,

Construction of new access road, lorry park, weighbridge and building, car park, Kronospan Ltd, Holyhead Road, Chirk, Wrexham

Thank you for your letter inviting our comments on the amended information submitted for the above planning application.

Advice

We consider that the application is inadequately documented and we recommend that additional information is required to enable a balanced decision to be taken against Planning Policy Wales, Technical Advice Note 24 Historic Environment and associated guidance. Full details of the additional information that is required are explained in the below assessment.

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The national policy and Cadw's role in planning are set out in Annex A.

Assessment

Scheduled Monuments

DE117 Castell y Waun Castle Mound
DE133 Offa's Dyke: Caeau-Gwynion Section
DE134 Offa's Dyke: Chirk Castle Section extending NE from Castle Mill
DE135 Offa's Dyke: Chirk Park Section extending NE from the Lake
DE138 Offa's Dyke: Section N & S of Plas-Offa
DE140 Offa's Dyke: Section N & S of Tan-y-Cut
DE175 Pontcysyllte Aqueduct and Canal
DE198 Offa's Dyke: Chirk Park Section extending 340m NE of Home Farm
DE223 Darland Wood Round Barrows
DE288 The Holyhead Road: the Chirk Embankment and earlier trackways

Listed Buildings



Registered Parks and Gardens:

PGW(C)11(WRE) Whitehurst
PGW(C)15(WRE) Brynkinalt
PGW(C)42(WRE) Argoed Hall
PGW(C)63(WRE) Chirk Castle
PGW(C)64(WRE) Wynnstay

World Heritage Sites:

Pontcysyllte Aqueduct and Canal

Amended plans and a revised environmental statement and associated documents have been submitted for this application.

The new plans show the lorry park, weighbridges and weighbridge building, car park and facilities block, roundwood storage areas and 132kv substation, and ancillary works in the southern part of the application area with the previously proposed most visually prominent area of lorry park removed and this area being laid out as a wildflower meadow. The revised environmental statement considers that these changes have reduced the effect of the proposed development on the settings of scheduled monument DE175 Pontcysyllte Aqueduct and Canal, Chirk Castle and the registered Chirk Castle historic park and garden so that they are no longer significant, we concur with this assessment: However, whilst it concludes that the impact on the outstanding universal value of the World Heritage Site will be reduced there will still be an adverse impact on the outstanding universal value of the World Heritage Site. It has therefore proposed off-setting measures to compensate for this effect.

In our opinion, the bund located alongside the B5070, from the roundabout and entrance to the site, to the point where the road to the weighbridge car park meets with it, is now superfluous, as its purpose was to screen parked lorries in the area of parking that has now been removed. To construct this bund will require the removal of mature trees and cause damage to the soils of the proposed wildflower grasslands area. Consequently, this section of bund should be removed from the plans for the development.

Sections 6.8.6 - 6.8.8 of the environmental statement proposes offsetting measures to compensate for the impact of the proposed development on the world heritage site. These are welcomed: However, to ensure that the proposed Conservation Management Plan (CMP) provides sufficient benefits to outweigh the adverse impacts, there is a need to have more details of the measures that will be submitted, and this should be undertaken before the determination of the current planning application. This will require the works outlined for the CMP, given in section 6.8.7 to be carried out, so that an outline action plan can be submitted showing the main management works that will be carried out as part of the CMP.

The application should not be determined until the amended plans and the outline action plan of the CMP have been submitted and Cadw have been reconsulted on this application.





Yours sincerely,

Nichola Smith
Casework Manager
Historic Environment Branch



Llywodraeth Cymru
Welsh Government

Annex A

Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

National Policy

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Technical Advice Notes and related guidance.

PPW [planning-policy-wales-edition-11.pdf](#) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)

[Technical Advice Note 24: The Historic Environment](#) elaborates by explaining that when considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains.

Historic Parks and Gardens

PPW also explains that local authorities should value, protect, conserve and enhance the special interests of parks and gardens and their settings included on the register of historic parks and gardens in Wales and that the effect of a proposed development on a registered park or garden or its setting should be a material consideration in the determination of a planning application.