



**Ymddiriedolaeth
Genedlaethol
National Trust**

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12th Feb 2024

Additional Information Reconsultation response to planning application P/2022/1080.
CREU FFORDD FYNEDIAD NEWYDD, PARC LORIS, PONT BWYSO AC ADEILAD, MAES
PARCIO, BLOC CYFLEUSTRAU, ARDALOEDD STORIO COED CRWN, IS ORSAF 132 KV
A GWAITH ATEGOL / CONSTRUCTION OF NEW ACCESS ROAD, LORRY PARK,
WEIGHBRIDGE AND BUILDING, CAR PARK, FACILITIES BLOCK, ROUNDWOOD
STORAGE AREAS ,132 KV SUBSTATION AND ANCILLARY WORKS
KRONOSPAN LTD HOLYHEAD ROAD CHIRK WREXHAM

Via email

Additional information reconsultation: Response by National Trust, 12th Feb 2024

I refer to your letter dated 6/2/24 concerning the above planning application.

We note a number of revised documents and consultation responses have been provided. Our comments relate to the following: Conservation Management Plan (report reference P00196.02.3); Woodland Management Plan (3046-01-WMP); Additional offsite planting plan 3046-01-ENG-04 dated Jan 2024; Consultation response by NRW dated 18/1/24 (Ref CAS-245120-R3G2).

We would provide the following response to issues.

-Conservation Management Plan.

We welcome the production of the CMP but consider it lacks clarity of implementation. We hope Wrexham Council will clarify the scale of commitment prior to determining the application. We would question whether the correct proposals or scale of actions are brought forward and would hope Wrexham will deliver greater ambition. In terms of specifics:

Para 6.9 on p.34 proposes new visitor interpretation information. Considerable investment in World Heritage Site high quality visitor interpretation has been made recently by the Canal and Rivers Trust in the Chirk area. We would suggest further visitor signage is a low priority under the Active Travel Objective and a more substantive and significant contribution should be required.

A contribution should be sought to extend or reproduce the Dee Valley Picturesque Visitor Bus to the WHS area (potentially linking the WHS Chirk Ruabon Railway Stations to the

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WHS and Chirk Castle). This could be delivered as a financial contribution via Section 106 Agreement over 5 seasons and provide a compensatory package for both WHS and AONB. The link to the existing bus is provided below:

<https://www.clwydianrangeanddeevalleyaonb.org.uk/projects/the-picturesque-bus/>

Para 6.13 on page 35 proposes a commuted sum for supporting matched funding from Cadwyn Clwyd. This is supported but no further comment can be made without any detail on funding or timescales. We await the views of the Friends of Whitehurst Gardens to the proposal.

Paras 6.14 through to 6.18 outline measures to improve the management of land owned by Maesgwyn Estate on Offas Dyke and include revisions to tenancy agreements to bring forward better management. National Trust welcome the recognition of this work and encourage the new tenancy arrangements for Maesgwyn Estate tenants, but consider this is required anyway given the responsibilities of the Estate on the Scheduled Monument.

Whilst we welcome the work completed on the CMP it is very short in action and clarity of implementation.

NT fed back to an initial draft of the CMP and suggested that Maesgwyn Estate might add biodiversity actions to the document. This has not emerged in the final CMP.

Biodiversity enhancement of the CMP area could be brought forward in the CMP.

NT is managing its estate at Chirk to contribute towards its strategic ambitions of 'Improving the State of Nature', 'Looking After what we've got' and 'Climate Action'. The National Trust objectives and KPIs include:

1. Improve the condition of our SSSIs and Priority Habitats
2. Restore/create 25,000 hectares of Priority Habitat by 2025
3. Ensure all our land achieves the High Nature Status – with 50% of let land (and all in-hand land) reaching it by 2025

The National Trust would like the Maesgwyn Estate to also place Nature at the centre of its strategy in managing the estate. The current planning application offers a timely opportunity.

The proposed Welsh Government Sustain Farming Scheme that will replace the EU Common Agri Policy (CAP) as from 2025. Farmers, and tenant farmer will attract payments upon actionizing 'Universal Actions'. Two Scheme rules will necessitate farmers managing at least 10% of their lands as 'priority habitat' and at least 10% under 'tree cover' as deciduous woodland, making a total allocation of 20% as priority habitat. (Deciduous wood is also a priority habitat)

The Kronospan CMP Study Area is 584.2 hectares (the total Maesgwyn Estate Ltd area is 1032.7 hectares).

NT suggests that a Planning Condition could bring forward a more ambitious CMP and include the wording for the CMP (blue line of the application or by Section 106 Agreement):

**-to manage the SSSI to achieve a “satisfactory condition” as assessed by NRW;
-to restore/create 292ha of land within the CMP as “priority habitat” by 2034 (10 years), this will amount to 50% of the CMP study area to be priority habitat.**

Priority Habitat as defined by Environment (Wales) Act 2016 Section 7.

This brings forward an appropriate level of biodiversity enhancement than that proposed by the Kronospan application, commensurate with the scale of proposed operation in Chirk.

NT would also wish to clarify how the futurity of the wildflower meadow (previously identified as the lorry park) will be secured. We hope Wrexham will secure the management of this area by planning condition.

-Woodland Management Plan on land owned by Canal and Rivers Trust.

NT welcomes the inclusion of this management secured by a Unilateral Undertaking. The current information does not indicate the mechanisms of implementation or scale of contribution at this stage.

-Additional offsite planting plan 3046-01-ENG-04 dated Jan 2024.

NT support the inclusion of this additional area alongside an implementation mechanism.

-Impact to AONB.

NT note the response by NRW (24th January 2024) who state “although the northern extent of the lorry park has been reduced in the revised proposals, lorry parking, activity, and ancillary elements would still be visible and noticeable at these viewpoints. These elements would replace agricultural fields that currently make a positive contribution to the character and visual amenity of the AONB, particularly at Chirk Castle”.

NRW appear to have come to their conclusion based on application submissions which indicate that new planting and changes to existing management are proposed within the Chirk Castle Estate (page 5 para 3 quoting application submission Section 5.3.8 relating to further offsite enhancements). This is not correct. NT has indicated since pre application that screen planting cannot be undertaken on any land owned by NT. We are nearing the end of a 25-year planting plan based on the historic Emes plan for the Chirk Castle Estate.

The proposed NRW condition (or a Section 106 Agreement) cannot be implemented, and the residual visual harm to the AONB will need to be included in the planning balance in your decision on the application. A package of compensatory measures should be agreed in advance of decision if this is considered appropriate. This impact and harm to the AONB

should be fully recognised in the report for Members decision, and any revised position by NRW on the issue.

Conclusion of NT reconsultation issues (Feb 2024).

NT notes that the current consultation underway by NRW which is looking to bring National Park status to this area of Chirk, and recognition of the quality and national importance of landscape-and its associated economic benefits. This reemphasises the National Trust position that landscape, environment, and heritage form a fundamental cornerstone of the economics of the Chirk area. The current application still appears to dismiss the wider role of Kronospan in its setting and context.

In our previous response to the revised drawings (by email dated 24/10/23) we had hoped for more clarity on what might constitute a Section 106 Agreement. The current reconsultation makes some issues a bit clearer but uncertainty in scale, ambition and implementation mechanisms remain unclear.

We consider further detail and clarification is required with the following:

- residual landscape and visual impact to the AONB cannot be mitigated by planting on NT land at Chirk Castle and needs to be part of the planning balance of the scheme.

- clarification of the scale of contribution within a Section 106 Agreement to Friends of Whitehurst Garden.

- clarification of implementation mechanisms and the scale of operation for the proposed Unilateral Undertaking with Canal and Rivers Trust for land within the WHS.

- inclusion of a financial contribution to the Active Travel Corridor of the WHS by improving visitor experience through the extension or reproduction of the existing Dee Valley Picturesque Bus visitor service.

- to manage the SSSI to achieve a “satisfactory condition” as assessed by NRW;
- to restore/create 292ha of land within the CMP as “priority habitat” by 2034 (10 years), this will amount to 50% of the CMP study area to be priority habitat.

Priority Habitat as defined by Environment (Wales) Act 2016 Section 7.

- inclusion of a planning condition requiring the implementation of a wildflower management plan for the area to the north of the proposed lorry park and its retention in perpetuity (given its inclusion as planning justification of the proposed scheme);

Thank you for the opportunity to comment.

Yours sincerely. John Pearson. Planning Adviser, National Trust.