



**Bryniau Clwyd a
Dyffryn Dyfrdwy**
Clwydian Range
and Dee Valley

Ardal o Harddwch Naturiol Eithriadol
Area of Outstanding Natural Beauty

Bryniau Clwyd a Dyffryn Dyfrdwy AHNE
Park Gwledig Loggerheads, Yr Wyddgrug, Sir Ddinbych CH7 5LH

Clwydian Range and Dee Valley AONB
Loggerheads Country Park, Nr. Mold, Denbighshire CH7 5LH

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Ref P/2022/1080

Dyddiad | Date: 4th April 2024

Gwyn Humphries
Economy and Planning
Wrexham County Borough Council
Guildhall
Wrexham
LL11 1AY

Dear Gwyn,

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, Wrexham

I refer to your previous consultation on this application. The following observations are submitted on behalf of the Joint Committee.

The Joint Committee would respectfully request the following observations are reported fully within the Addendum report to your Planning Committee meeting on Monday 8th April.

Firstly, we are disappointed that the Officer report places undue weight upon the applicant's LVIA in appraising visual impact and does not relay or adequately address the concerns raised by the AONB Joint Committee during the consultation exercise. It is accepted that comments are summarised but the report does not accurately reflect the essence of our responses.

There clearly will be an adverse impact upon the AONB both in terms of its setting and views out from the designated area. It is therefore contrary to LDP Policy NE4. That is not to say, of course, that other material considerations such as the environmental benefits to Chirk residents outweigh this matter on this occasion. However, it is incorrect and indeed misleading to state that it is "compliant with the requirements of LDP policy NE4, when it is not.

There is obviously an impact because central to the Officer's justification in recommending approval is the extent of the proposed mitigation.

It is in this regard that the Joint Committee request you include further conditions to mitigate the impact.

Firstly, Permitted Development Rights under Part 8, Class A & B (Industrial & Warehouse) should be removed. The proposal is effectively an extension to the existing industrial curtilage

and covers a large area. The absence of a condition removing permitted development rights could result in the applicants erecting buildings and hardstanding etc on this land without having to apply for planning permission. In fact, they could erect a building up to 1000 sq m in size and up to a height of 15 metres under their permitted development rights. This is of particular relevance when the Officer is justifying and accepting the visual impact here, on basis that the tallest structure will be the 3 storey weighbridge at 9 metres.

Secondly, and notwithstanding the proposed conditions on landscaping and tree protection measures, there does not appear to be any condition which specifically requires the retention of both existing and proposed woodland areas in perpetuity. Given the importance of screening in supporting this development, it seems remiss of the LPA not to make this more explicit, should you be minded to grant permission.

Finally, and in addition to the removal of Permitted Development rights, it may also be prudent and for the avoidance of doubt, to include a further condition restricting the both the uses and the areas specifically to those shown on the approved plan.

This is a very large extension. The extent of the application site area includes open areas which could result in further incremental encroachment of industrial/storage development beyond that shown on the proposed layout plan. Without adequate controls the potential impact could be far greater than currently envisaged.

Should Members be minded to accept the Officer Recommendation and approve the development, the Joint Committee would respectfully request you consider including these additional conditions.

Yours sincerely,

Dave Williams
AONB Planning Advisor
For the Clwydian Range and Dee Valley AONB Joint Committee



