

Response submitted by National Trust to Wrexham County Borough Council.

Proposal: 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

Introduction

Thank you for the opportunity to respond to the consultation on the above relating to revised drawings and documentation outlined in the letter dated 1st August 2023 from Bobby Clayton at Axis.

Consultation Response.

National Trust (NT) consider there are improvements to the submitted scheme both in layout and documentation, but the basis of its comments to the original application remains.

We have significant concerns about the submitted scheme: its location, the nature of the proposal and its proximity to a diverse range of nationally and internationally recognised landscape and heritage assets.

NT agree with the conclusions from the pre app 1 from Wrexham County Borough Council that the proposed development represents an urban intrusion into the rural countryside landscape surrounding Chirk impacting on the setting of the WHS and AONB. NT agree with the conclusions of the AONB consultation response stating “The proposed development involves a significant extension of the existing industrial curtilage of Kronospan into adjoining open countryside, a designated Green Barrier and Special Landscape Area. It is contrary to both existing UDP and emerging LDP policy”, and “once this change of use has occurred it will be extremely difficult to resist further built development and log storage in this area”.

NT do not consider the revised submission achieves a proposal with least environmental impact and an appropriate planning balance.

We would have the following observations on the resubmitted documentation.

Revised layout drawings.

Submission drawing (General Arrangement Figure 4.1_rev A) brings forward the same level of extension into open countryside as previously proposed incorporating the same significant bunding. The revised lighting scheme (Appendix A Lighting Model Imagery) demonstrates the extension of the site into open countryside. The combined effect of layout, bunding and lighting would mean any proposed change from wildflower meadow to industrial development would be hard to resist.

Strategic planning context.

The revised documentation remains based around a Vision 2025, without any detail/plans/consultation as to what constitutes Vision 2025. Para 3.2.4 of the Planning Statement indicates that an annual Environmental Social Governance Report will be prepared for the Vision 2025 Strategy including assessment against performance targets. No details appear to be available on either targets or performance. NT suggest the statements relating to Vision 2025 should have no material planning consideration given it has not been subject to any consultation, discussion, or adoption or approval by the Planning Authority.

The revised Planning Statement and planning balance

NT considers the application continues an underestimation of landscape harm and does not agree with the conclusion that the presence of the new features “would result in a localised sense of urbanisation and limited in extent and intensity” (para 5.2.5). The documentation also seeks to demonstrate compliance with policy with reference to different schemes (biodiversity in para 7.3.8 in relation to the POA terminal and foreshore works to deliver net biodiversity benefit; 7.3.191 refers to sitting alongside other industrial buildings and structures?).

The revised plans extend the impact of the Kronospan site to a greenfield location with significant change in how the site will be viewed from what is a multi-designated landscape. The application is the first outside the established industrial area of the Kronospan site and within the Buffer Zone of the WHS and 600m of the AONB.

Heritage assessment.

NT welcome the submission of the Heritage Based Assessment (Report 2215) which more effectively considers the impact of the proposed scheme on heritage assets.

We would note the recognition in the document of the heritage value and context of the Chirk area and despite extensive development at Kronospan “the rural nature of the area has largely survived” (para 3.1.14). We note the recognition of significance of Chirk Castle and the surrounding Park and Garden and confirmation that “views of the existing Kronospan facility are blocked by trees of the pleasure ground woods” (para 3.2.5) and “the castle’s setting largely retains the appearance established by the landscaping of the park in the late 18th century” (para 3.2.15).

Figure 5.3c_revA (vi) demonstrates the proposed development will be visible from Chirk Castle and the Registered Park and Garden. The revised layout reduces the

amount of visible development but still brings forward 7.1m bunding (around the wildflower meadow) and a layout that will facilitate further, future development.

NT consider that insufficient examination has been made with regard to mitigation and enhancement within the submitted revised heritage assessment. Stage 4 of the Guidance and Toolkit for Impact Assessments in a World Heritage Context include the requirement to consider mitigation and enhancement. The revised submission does not adequately explore alternatives and mitigation measures in relation to a reduced area of development, removal of engineering bunding in the north, a more southerly roundabout location.

Enhancement works.

The submitted application drawing (off site Landscape enhancements Figure 4.3b_revA) illustrates the very limited area proposed for offsite landscaping. The proposals are five areas of planting, one of which has brought forward an objection due to the proximity of the scheduled section of Offas Dyke. Initial proposals included the offsite management of areas owned by Canal and Rivers Trust. NT supports this initial inclusion, has this offer now been withdrawn?

The offsite planting plan is insufficient given the scale of development and harm brought forward.

Compensation proposals.

Sections 6.8.6 - 6.8.8 of the revised documentation (ES Chapter 6, Historic Environment Rev A) proposes offsetting measures to compensate for the impact of the proposed development on the WHS. No further information is provided or examined, nor the scale of implementation clarified. With such lack of detail (or cross referencing in the HS and Revised Planning Statement) no weight should be given to its inclusion. NT is happy to discuss without prejudice a draft action plan and implementation fund in relation to wider compensation measures should Wrexham and CADW consider this an appropriate way forward.

Thank you for the opportunity to comment.

Yours sincerely

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