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Eich cyfeirnod
Your reference

P/2022 /1080

Ein cyfeirnod
Our reference

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Date

28 February 2023

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Dear Matthew

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

Thank you for your letter of 9 January inviting our comments on the information submitted for the above planning application.

Advice

We object to above application because of the impact of the proposed development on the setting of the grade 1 listed building Chirk Castle, the grade 1 registered Chirk Castle historic park and garden, scheduled monuments DE133 (Offa's Dyke: Caeau-Gwynion section) and DE175 (Pontcysyllte Aqueduct and Canal) and the Pontcysyllte Aqueduct and Canal World Heritage Site. Our assessment of the application is given below.

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

Assessment

This advice is given in response to a planning application for an extension to the existing Kronospan works at Crick. The application is accompanied by an Environmental Statement produced by Axis with Chapter 6 Historic Environment based on information provided by Archaeology Wales, including a Setting Assessment and a Heritage Impact Assessment which are presented as Appendices to the Environmental Statement.

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

Chirk Castle Grade 1

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

Proposed Development

The proposed development consists of a new access road into the Kronospan facility, commencing at a roundabout on the B5070, along with a lorry park, weighbridges and weighbridge building, car park and facilities block, roundwood storage areas, a 132kv substation, and ancillary works. All of these elements will be constructed to the north of the existing Kronospan complex.

The new access road will be some 375m long, with the lorry park being some 12000m². The weighbridge building will be timber clad structure of 3 storeys, some 9m in height, with an attached gantry, 5.6m high. The adjoining carpark will be circa 900m². The two roundwood storage areas will be 4700m² and 3900m² with stacks of logs being no more than 5.8m high. The 132kv substation will cover an area of 3600m² with its total component being circa 6.3m high.

The weighbridge building, adjoining carpark, electricity substation and roundwood storage area will all be located at the southern end of the proposed development area, closest to the existing Kronospan complex, with the lorry park to the north. Thus, the permanent tall structures will be close to the existing facility and in views from the north will be seen with the existing tall Kronospan structures behind them and from the west with the houses of north Chirk behind them. The lorry park will accommodate up to 91 HGVs. These will be circa 16.5m long, 2.55m wide and up to 4.95m high. These lorries are likely to have distinctive livery and their movement during arrival and departure will attract attention from viewers.

Designated Historic Assets

The proposed development will impact on the settings of the grade 1 listed building Chirk Castle, the grade 1 registered Chirk Castle historic park and garden, scheduled monuments DE133 (Offa's Dyke: Caeau-Gwynion section) and DE175 (Pontcysyllte

Aqueduct and Canal) and the Pontcysyllte Aqueduct and Canal World Heritage Site. However, intervening topography, buildings and vegetation will block all views between the other historic assets identified as being located 3km inside of the proposed development.

Listed Building

The proposed development is located some 2km northeast of the Grade 1 listed building Chirk Castle.

The original castle was probably begun soon after 1295, for Roger Mortimer, for the newly created marcher lordship of Chirkland, on lands formerly being that of the Principedom of Llewelyn ap Gryffydd ap Madog. The royal mason, Master James of St George from Savoy, was probably the originator of the plan form. The first major stage of building probably extended until Mortimer's fall in 1322. It then passed through the hands of the Earls of Arundel, the Beauforts, and to Sir William Stanley c1475. It was then administered by the Tudors, with some large scale repairs taking place before 1529, until 1563 when it was granted by the queen to the Robert Dudley Earl of Leicester. In 1595 it was purchased by the merchant adventurer Thomas Myddleton, in whose lineage it has continued until the present day. The external shell of the building is early 13th century in date but the east and souths sides along with the principal hall range on the north side were rebuilt in the early 14th century. After some damage during the civil war, followed by limited demolition, probably of the upper part of the towers in 1659, work was undertaken by Sir Thomas Myddleton, 2nd baronet in the eastern range and further works was carried out in 1673-8 under the guidance of Lady Wilbrahim of Weston, Staffs, in the style of William Wynde. Richard Myddleton, the 18th century owner, employed Joseph Turner, surveyor of Hawarden, to remodel the state rooms in 1766-78, supervised by John Cooper of Beaumaris, and further work was undertaken in the mid-1840s by A W N Pugin, who had been engaged by Col Robert, and who provided a facade for the E range and undertook internal alterations in collaboration with J G Crace. A W Pugin died in 1852, and the ongoing work was continued by his son, Edward W Pugin. The chapel was restored by Sir A Blomfield in 1894, and further work was carried out by Lord Howard de Walden in 1912-13. The castle was bought for the nation in 1978 and placed in the care of The National Trust.

The building is a Grade I listed building as it is building of major national importance, being one of the series of Edwardian castles of Wales, adapted to become the seat of an important marcher landed estate, in which context, successive leading architects and designers were involved in the creation of a major country house within the medieval framework, of which fine work of the late C18 and mid C19 especially stands out.

When constructed the Castle had a strategic role as well as being the administrative centre of the marcher lordship of Chirkland. As such, all views from the castle were significant with the most important being eastward in an arc from southwest to North over the valleys of the River Dee and the Afon Ceiriog. These remained the significant views from the castle when it was converted into a major country house.

The proposed development will be visible from the Castle, in particular in significant views from the battlements in which the lorry park will be particularly noticeable. In the Heritage Impact Assessment accompanying the application, Archaeology Wales suggest that these changes to the significant views will constitute a Minor change which will have a Moderate/Slight effect on the setting of Castle. However they have underestimated the value of this heritage asset. As the Castle is a Grade 1 listed building (it is included on the list of properties covered by the Hague Convention as being of international importance). On this basis, following the ICOMOS 2011 assessment system (used by Archaeology Wales in their setting assessment) the value of the Castle is Very High. As such a Minor change to the setting of an asset of Very High value equates to a Moderate/Large impact and in my professional opinion, it will be significant in scale. Therefore, the proposed development will have a significant harmful effect on the setting of Chirk Castle.

Registered Historic Park and Garden

The application area is located some 1.12km east-south-east of the boundary of the Grade 1 registered Chirk Castle historic park and garden. The historic park and garden is situated on elevated ground to the north of the Ceiriog valley, west of Chirk village. It is registered for its outstanding landscape park, partly designed by William Emes, and its terraced and informal garden which includes remains from the medieval period onwards, all set in a fine elevated position. The setting of the historic park and garden therefore includes the extensive views to the east and northeast.

The proposed development will be visible from numerous locations in the north and northeast of the park, including the New Hall entrance (the second main entrance to the park) with views becoming much clearer from the higher ground of the northern park where intervening trees provide less screening than views at lower levels. In these views the application area is seen as green fields providing open space in front of the modern housing estates of northern Chirk.

The views from the higher northern part of the historic park have not been considered in the setting assessment prepared by Archaeology Wales (or in the LVIA). Consequently, their conclusion that the proposed changes to the views from the registered historic park and therefore the impact on its setting, will be minor underestimates the scale of this impact. In my opinion this impact will be Moderate in scale.

The setting assessment has used the ICOMOS 2011 assessment system to determine the effect of the proposed development on the designated historic assets. Archaeology Wales have considered that the value of the Chirk Castle historic park and garden is high using this system as in their opinion it is a "Nationally designated historic landscape of outstanding interest": However, in my opinion, it clearly meets the criteria "Extremely well preserved historic landscapes with exceptional coherence, time depth, or other critical factors" which has a value of Very High.

Therefore, using the ICOMOS methodology the effect of the proposed development on the setting of the registered Chirk Castle historic park and garden should be Very High X Moderate which equates to a Large/Very Large Effect which is significant.

However, even if the Archaeology Wales assessment of minor impact is accepted then the effect will be Moderate/Large which still equates to a significantly adverse effect.

Scheduled Monuments

DE133 Offa's Dyke: Caeau-Gwynion Section

Scheduled monument DE133 Offa's Dyke: Caeau-Gwynion Section is located some 1.1km northwest of the application area. Offa's Dyke is a linear boundary earthwork, comprising a bank and ditch, believed to be of Early Medieval date running, with some gaps, for roughly 120km through the border area between modern Wales and England from Sedbury near Chepstow to Treuddyn in Flintshire. It is traditionally thought to have been built by the Mercian King Offa in the later 8th century, but recent excavations on a section near Chirk suggest that some sections may incorporate earlier earthworks. Whilst its exact function and original form are still the subject of debate Offa's Dyke is significant as the longest and one of the earliest surviving boundary monuments in Europe marking a nominal frontier between Saxon Mercia and Welsh kingdoms to the west. It represents one of the great engineering achievements of the pre-industrial age and the most dramatic built structure to survive from the early medieval (c410-1100) period in Britain. Offa's Dyke is scheduled in multiple different sections on both sides of the present border. These display their own local physical characteristics but all share and contribute to the overall significance of the monument and have potential to enhance our knowledge of the monument as a whole. Significant views are generally towards the west looking towards the likely direction of any attack.

This section of the Dyke is some 665m long running southwest to northeast. It consists of the well-preserved remains of the bank with, in places, faint indications of the ditch on its northwestern side.

The proposed development will be clearly visible from several locations along the scheduled monument. However, the significant views from the Dyke in this area are to the northwest. Views to the southeast add little to the significance of the monument. As such the impact of the proposed development on the setting of the scheduled monument will be Minor and therefore using the ICOMOS 2011 assessment system the effect Slight. The Archaeology Wales Setting Assessment concurs with this result.

DE175 Pontcysyllte Aqueduct and Canal

The boundary of the application area is adjacent to scheduled monument DE175 Pontcysyllte Aqueduct and Canal, but the main areas of the proposed development are located some 130m to the east. The canal and aqueduct were built between 1795 and 1808 and is a masterpiece of historic transport development and the greatest work of two outstanding figures in the history of civil engineering: Thomas Telford and William Jessop. Pontcysyllte Aqueduct crossed the Dee Valley by nineteen spans at a height of 38.4 metres. Its application of the new technology of cast iron to create the tallest and longest navigable aqueduct in the world was a daring and spectacular achievement. The associated 18-kilometre section of navigable waterway is an outstanding example of advances in canal building in the Industrial Revolution, one of the fundamental turning points of human history.

The section of the canal closest to the proposed development passes through a cutting with the slopes lined by trees. When constructed, the canal passed through an agricultural landscape, but in the 20th century the Canal Wood Industrial Estate and the Kronospan complex have been constructed to the east of it. Views of the proposed development from the canal will be extremely limited due to its location in the cutting with the existing trees providing substantial screening. The existing industrial activity in the area has already had an impact on the tranquillity of the canal, which is an important characteristic in other sections of the route, but the proposed development will increase noise in this area.

The assessment of the impact of the proposed development on Chirk Castle and its historic park and garden has established that it will be visible from higher ground to the west. Although the canal itself is not visible in these views, its route and position in the landscape can clearly be seen, marked as it is by the line of trees planted alongside it. These could be argued to form some screening of the proposed development, but this is limited. The relationship between the canal and the topography of the landscape that it proceeds through is a significant element of its setting, as it was due to the difficult terrain that engineering solutions needed to be instigated during its construction. This technical element of its heritage values is demonstrated in this area by the need for cuttings and the Chirk tunnel to allow the canal to progress through the higher ground, rather than using locks to follow the existing topography. These features are important elements of the Canal, demonstrating its relationship with the landscape. The proposed development, in particular the lorry park, will be harmful to the setting of the canal, altering historic agricultural land to industrial character which will be particularly marked due to the movement of lorries. Consequently, it is my opinion that the proposed development will have a moderate adverse impact on the setting of scheduled monument DE175, which is agreed by Archaeology Wales.

As well as being a scheduled monument the Canal is part of the World Heritage Site, as such (following the ICOMOS 2011 assessment system, used by Archaeology Wales in their setting assessment) the value of the Canal is Very High. The impact table therefore records the effect of the development as Large / Very Large and therefore significant.

Non-Designated Historic Assets of National Importance

The archaeological evaluation discovered a limekiln which had been dismantled suggesting that rather than being an agricultural structure it was associated with a major construction project. The limited evidence found during the excavation suggested that the limekiln was in use in the 18th or early 19th century. The major project carried out in the area during this period was the construction of the Shropshire Union Canal. Thus there is a potential connection between this feature and the World Heritage Site, that would indicate that the limekiln could be of National importance. Documentary research is currently being carried out to provide more information on this feature. Until the results of this research has been concluded the limekiln must be considered as Nationally important historic asset.

The limekiln is located immediately to the west of the proposed lorry park in an area where it was proposed to plant trees. The planting scheme has been altered to ensure that the site of the limekiln will not be affected. Thus, the limekiln will be preserved in

the development and there will be no direct impact on it. Even when they are buried archaeological sites have a setting. In this case the setting of the limekiln will be significantly changed by the construction of the lorry park, which will interfere with the visual link to the canal. However, given that it currently has no visual presence, the installation of appropriate information boards at the site would mitigate the impact on its setting.

World Heritage Site

The application area is adjacent to the boundary of the Pontcysyllte Aqueduct and Canal and is in its identified Buffer Zone. However, the main areas of the proposed development are located some 130m to the west.

The buffer zone was established to conserve the cultural and aesthetic landscape, sense of arrival, views, and distinctive character and sense of place which contribute to the outstanding universal value of the World Heritage Site but are outside its boundaries.

The outstanding universal value of the World Heritage Site includes the statement.

“The Pontcysyllte Canal is a remarkable example of the construction of a human-engineered waterway in a difficult geographical environment, at the end of the 18th century and the start of the 19th century. It required extensive and boldly conceived civil engineering works”.

The civil engineering works in the vicinity of the proposed development are the cuttings leading to the Whitehouse Tunnel showing how these solutions were required to allow the Canal to proceed as a level structure, not requiring locks or other engineering solutions to climb over the high ground between Chirk and Bryn-yr-Eos.

The current Kronospan complex covers an area of some 41.2 Ha and is a long established industrial site. However, section 4.12 of the World Heritage Management Plan 2019-2029 notes that it has a potential to impact on issues of setting. Recent development proposals have been confined inside the current boundaries of the site so that there would not be significant changes to the views or the setting of the World Heritage Site. In contrast, the current proposed development will expand the site northwards by circa 650m and cover an additional area of some 11.74 Ha, the majority of which is currently agricultural land.

The assessment on the impact of the proposed development on the Canal has been given above, in particular when viewed from the higher ground to the west. As outlined above, the proposed change of use from agricultural land to industrial will have a significant impact on the setting of the canal. This will be particularly evident at a landscape level and when viewed from distances and from the air. There are a number of television documentaries that use aerial photography (such as the 2009 BBC 4 Hidden Histories) to assist in explaining the landscape surrounding the aqueduct and canal. Aerial views will clearly show the proposed development as a major change to the Buffer Zone interfering with the relationship between the canal and its surrounding landscape and making a significant change to the character of the area.

The changes to the views of the development from the West and from the air will have a significant impact on the World Heritage Site's Outstanding Universal Value.

Alternative Developments

The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (The EIA Regulations) states at Regulation 17 that an ES must include 'a description of the reasonable alternatives studied by the applicant or appellant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the significant effects of the development on the environment'. In light of the high heritage sensitivity of this location, and specifically the proximity to the World Heritage Site we strongly emphasised in our response to the statutory pre-application consultation the need for the applicant to fully investigate alternative approaches that would reduce the scale of the development and its impact on the historic environment. Our response included one suggested alternative approach for which the applicant has provided some limited assessment. However, it is our view that the treatment of this in the Environment Statement does not constitute a full evaluation, and the applicant has not made any attempt to propose or evaluate all other alternatives, including the suggestion below. In view of the international designations affected, this is an insufficient consideration of the alternatives to the current proposed development.

Chapter 3 of the submitted Environment Statement includes information on alternatives to the submitted proposed development. It states:- *"It is only by using the land to the north that the intended benefits of diverting heavy goods vehicles (HGV) movements away from the main settlement would be realised."* We accept this statement, but in our opinion the applicant has not provided evidence around the full range of alternatives. For example, the area of the development could possibly be reduced considerably by restricting it to the area immediately to the north of the existing plant (an extension for the main part of the development of some 200m rather than the proposed 650m) and still provide the desired benefits. While we appreciate that the onus is on the applicant to undertake this analysis, we would be very happy to discuss alternatives if that was thought to be helpful. Possible alternatives could include deleting the roundwood storage areas; re-siting the electricity substation to the existing lorry park and deleting the weighbridge car park. This could allow an area of some 13,100 m² for the lorry park, which would be considerably larger than the existing lorry park (11,460 m²). We acknowledge that the access road would still be required, but this could possibly be located, for much of its route, alongside the B5070, so that the impact on the historic environment would be similar to the existing road.

Conclusions

The proposed development will have significantly damaging effect on the settings of scheduled monument DE175 Pontcysyllte Aqueduct and Canal, the grade 1 listed building Chirk Castle and the grade 1 registered Chirk Castle historic park and garden. It will also have a significant effect on of the Pontcysyllte Aqueduct and Canal World Heritage Site and its buffer zone which will cause significant damage to the Outstanding Universal Value of the World Heritage Site. Whilst mitigation measures

may reduce some of these impacts, they will not reduce the effects to an acceptable level. As such the proposed development is contrary to the advice given in Planning Policy Wales Sections 6.1.18, 6.1.22 and 6.1.24; Section 66(1) of the Listed Buildings and Conservation Areas Act 1990; Policies EC1, EC5, EC7, EC9 and EC11 of the Wrexham Unitary Development Plan.

Alternative designs for the proposed development could achieve similar benefits with reduced impacts on the historic environment.

Yours sincerely,

Jenna Arnold

Diogelu a Pholisi / Protection and Policy

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.