

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.

National Trust (NT) is a charity founded in 1895 by three people who saw the importance of our nation's heritage and open spaces and wanted to preserve them for everyone to enjoy. More than 125 years later, these values are still at the heart of everything we do.

Chirk Castle was transferred to the Trust's protective ownership in 1981, along with the surrounding gardens and park. The castle welcomes over 170,000 visitors a year. Chirk Castle is a grade I listed building set within a park and garden registered grade I on the Cadw/ICOMOS Register of Landscapes, Parks, and gardens of Special Historic Interest in Wales. The gardens and park include several other listed buildings.

As a medieval fortress, the Castle was sited and designed to overlook the surrounding area including the town of Chirk. The relationship with surroundings was also integral to the design of the garden, which features a terrace with stunning views across Chirk and surrounding countryside. The views from the terrace are specifically identified in the CADW/ICOMOS register entry.

Our spirit of place statement recognises the importance of landscape and views, including our position overlooking the Dee and Ceiriog valleys and views out to 7 counties.

NT is proud of World Heritage Status achieved by Wrexham in 2009 for the Pontcysyllte Aqueduct and Canal. We note UNESCO's importance placed on the unified approach to the preservation of the buffer zone and the drafting of a plan for tourism development in the area. NT is a significant economic beneficiary of the tourism boost to the local economy by World Heritage Site visitors and we hope our

contribution is complementary to putting Wrexham and Chirk on the international heritage map.

Consultation Response Summary.

National Trust welcomes the opportunity to comment on the submitted planning application at Kronospan. We provided a response at pre application to the scheme and have had several meetings and a site visit with Kronospan and other heritage/landscape consultees.

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 conclusion from the CADW pre app that an alternative site should be considered outside of the Buffer of the World Heritage Site. 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.

We note the unresolved nature of some of the issues included in the submitted application in relation to screening, off site landscaping, a Heritage Section 106 agreement. We await the response from the Wrexham Conservation Team and the formal consultation response from CADW in relation to the impacts on World Heritage Site.

Consultation Response Detail.

We would have the following observations on the submitted planning application.

STRATEGIC AND SPATIAL PLANNING AT KRONOSPAN

NT commented on the previous proposals and consultation for a future Kronospan Vision 2020, including viewing a detailed model outlining the future plans in and around the Chirk area during 1999. We understood this represented the investment options for Kronospan for the significant future. None of the current proposals were included within the Kronospan Vision, and none of the area to the north of the existing works brought forward development. Vision 2020 was a clear way forward for Kronospan which went through external consultation and engagement.

The current planning application appears to be based around a Vision 2025 position, without any detail/plans/consultation as to what constitutes Vision 2025. Para 3.4.2 of the ES (Volume 1 p20) places emphasis on the plan stating, "The do-nothing approach would jeopardise Kronospan's Vision 2025 whereby the Proposed Development would provide enhanced facilities which would help maintain the future viability of the business at the site in Chirk". We suggest the statements relating to Vision 2025 should have no material planning consideration given it has not been subject to any consultation, discussion, or consideration/adoption or approval by the Planning Authority.

The current plans extend the spatial extent and 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.

We urge the Planning Authority to critically examine the landscape and visual context of the proposed scheme against the zone of theoretical visibility (ZTV). We note Figure 5.1b (LVIA Submission) summarises the overlay of ZTV against nationally and internationally designated assets. NT would note that a more effective use of iterative HIS might have concluded that siting some of the development outside the WHS buffer zone, and at greater distance from designations would reduce harm and potentially bring forward a reduced scheme.

The submitted documentation includes consideration of alternatives, both within the Heritage Impact Assessment (Section 5.2) and Environmental Statement (ES Chapter 3). NT agree with the CADW pre app consultation response which raised the question why an off-site lorry park would not be feasible outside the World Heritage Site (WHS) buffer zone.

More effective embedded mitigation might also incorporate an alternative layout including tree planting to break up the very hard approach to parking. Can a better layout include both hard and soft landscaping to reduce landscape and visual impact. The existing lorry park achieves this with a mix of both hard parking provision alongside tree planting. Few parking schemes achieve effective integration into the landscape without internal planting.

The proposed scheme will result in a very intrusive approach to the Chirk landscape. The site chosen is not within the existing industrial complex of Kronospan and sited as greenfield development. NT consider that the principle of the project does not meet national or local planning policy requirements.

IMPACT TO CHIRK REGISTERED PARK AND GARDEN

NT remains concerned about the impact to the Registered Park and Garden of Chirk Castle (PGW (C) 63; NPRN 70048).

NT welcome the additional work completed by Archaeology Wales in response to the pre application comments by CADW. Figure 12 of the submitted settings assessment (Designated assets assessed following CADW pre application response). This work illustrates the heritage context and setting of the application site within the buffer zone of the WHS and surrounded by multiple Registered Park and Gardens, including that at Chirk Castle. Views 7, 9 and 10 demonstrate visibility from within the Chirk Castle RPG.

The RPG is recognised within the application (6.6.5 Chapter 6 of the ES) as a key attribute of the WHS Buffer Zone. Paras 6.1.4 and 6.1.5 of the submitted HIS and Settings Assessment consider the implications to the Chirk Castle RPG. The application acknowledges impacts to the settings of the park and accepts that screening for areas of the application site lies outside the control of the applicant, and further effective screening cannot be brought forward.

Views from the RPG to the NE of Chirk Castle are most significantly affected, a large area with 60-80% of lorries theoretically visible. A further area at the North of the RPG having similarly elevated views into the application site and visible lorries. Within these areas the severity of impact will clearly be higher than the summaries provided within the submitted assessment tables (Table 6.8 Level of Effect during Construction ES Chapter 6); Table 6.9 Level of Effect during Operation ES Chapter 6). NT does not agree with the conclusions within para 6.6.12 of the submitted ES (Chapter 6) in terms of the effectiveness of mitigation planting at the western edge of the site to break up views, and the conclusions that this proposed mitigation will lessen the level of effect to Slight.

The impact to the RPG is considered to be an important residual harm that needs to be part of the planning balance of the decision on the planning application.

In relation to the associated enhancement for the RPG. The application states in para 3.3.10 of the submitted ES (Volume 1 p19):

“B: Enhancements within the Chirk Castle estate, envisaged to comprise a mixture of new planting and changes to existing management. Any proposals would be identified in close consultation with the National Trust and would seek to enhance the existing historic parkland landscape”.

During pre-application, NT drew attention to the importance of its work to restore the parkland to its historic Emes form, which would preclude any significant new planting to screen the development.

Achieving any screen planting from within Chirk Castle RPG is difficult due to the historical landscape restoration project implemented at the property. A 25-year programme of individual tree planting has been undertaken by NT based on an agreed planting plan dating back to January 1999. The scheme restores the work of 18th Century Landscape Designer William Emes at Chirk and brings forward individual tree planting across the castle landscape based on the 1760 layout. The scheme is due to be completed in 2023 and did not include significant massed tree planting which would be required to mitigate and screen viewpoints identified within the submitted LVIA. This scheme is provided for your information in this response.

It is unclear what change to management is proposed within the submitted application in this context.

The reference to enhancement within the Chirk RPG needs to be excluded from the considerations of the application.

NT draw attention to the link between Chirk Castle RPG and Whitehurst Garden RPG and consider this RPG to be a potential site for enhancement within any Section 106 Agreement if this is considered appropriate by Wrexham CBC.

IMPLICATIONS FOR WORLD HERITAGE SITE

The proposed development area is located within the Buffer Zone of Pontcysyllte Aqueduct and Canal World Heritage Site.

NT remain concerned about the implications of the proposed scheme on the status of World Heritage Site for Chirk, particularly in relation to the sense of arrival and WHS buffer zone. We await the CADW response to the consultation in relation to WHS status.

We would request that the Local Planning Authority carefully consider the application in the context of the buffer zone of the WHS and ensure all matters have been fully explored and justified.

CHIRK CASTLE

Para 4.1.18-20 of the submitted application HIA describe the importance of Chirk Castle, and paras 6.1.6-9 identify impacts. NT note the application site can be seen from the castle battlement and that planting within the estate (in NT ownership) provides screening for large areas of the existing Kronospan site and application area. We await the CADW response to the consultation in relation to any observations on the impact to this Grade 1 Listed Building.

NT is concerned about the increased light and sound at the Castle from Kronospan. This is an observation from existing operations that will be compounded by the proposed expansion into the greenfield location. The application brings forward 8m lighting columns to an area currently unlit, and new vehicular movements will extend the industrial sound and light footprints of existing operations. In this context we would note that bats are very susceptible to lighting and known to move through the canal corridor near to the application site.

We would suggest that if the Local Planning Authority are minded in approving the proposed scheme, a light and sound monitoring programme is brought forward to include areas within the ownership of NT.

LANDSCAPE IMPACT

The submitted application identifies the importance of LCA5a (Chirk Estate to Froncysyllte). Appendix 5.5 (ES Volume 3 Effects on Landscape Character) describes the features of the high value landscape including AONB, Chirk Castle, Offas Dyke Path and the presence of the Special Landscape Area. The application identifies the presence of the existing Kronospan facility as “an established discordant presence in outward views”.

The assessment included within Appendix 5.5 underestimates the size/scale of effect of the new development. NT consider that: many areas of the LCA would not be seen in the context of the existing Kronospan development, the new features will be smaller in height than some of the existing plant at Kronospan but the lorry park will be a coloured transient feature with 24-7 activity and continuously light both static and vehicular movements.

The Appendix includes reference to a Kronospan Landscape Strategy. This was a previous scheme brought forward under an application in the main core development area at Kronospan (relating to Condition 5 of Consent P/2016/0219). Some of the planting included in this Strategy will be useful screening for the subject application but some is irrelevant as it was brought forward for a different screening purpose. NT note the application includes a "Proposed Development-Offsite Landscaping Enhancements (within Kronospan landholding)" and provided as Figure 4.3b of the submitted LVIA. NT welcome the inclusion of the five areas but consider it an insignificant solution to the landscape issues for the application, given the proposed scheme and submitted blue line of the application. We hope Wrexham will discuss a wider and more comprehensive solution should they consider the scheme favourably. The blue line of the submitted application confirms the new significant land ownership by Kronospan in the wider Chirk landscape.

NT welcome the approach discussed verbally by the Canal and Rivers Trust to move forward a planting and Management Plan approach to screening on land within CRT ownership on the canal boundary. We would envisage such a scheme could move forward by Section 106 Agreement should Wrexham consider the need for offsite planting favourably.

Thank you for the opportunity to comment.

Yours sincerely

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