



KRONOSPAN, CHIRK

**PLANNING APPLICATION FOR THE ERECTION OF 2
NO. RAW MATERIAL SILOS, AN EXTENSION TO THE
EXISTING CHIP PREPARATION BUILDING, THE
ERECTION OF 3 NO. SILOS ASSOCIATED WITH THE
CHIP PREPARATION BUILDING, AND ASSOCIATED
WORKS**

PRE-APPLICATION CONSULTATION REPORT

AUGUST 2022

The axis logo consists of a solid blue square with the word 'axis' in white, lowercase, sans-serif font centered within it.

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1.0 INTRODUCTION

- 1.1.1 This 'Pre-application Consultation Report' (PAC Report) has been prepared in respect of a planning application made by Kronospan Limited (hereafter referred to as 'Kronospan') for the erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works (the 'Proposed Development').
- 1.1.2 The Proposed Development would be located at the Kronospan Manufacturing Facility on the industrial site that forms part of Maesgwyn Farm off Holyhead Road, Chirk, Wrexham (hereafter referred to as 'the Site'). The location of the Proposed Development within the Kronospan site is shown on drawings 7000_706, 8000_197, 9000_88 and Figure 1 of the Planning Statement.
- 1.1.3 In accordance with The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2012 (DMPO 2012), and subsequently amended in 2016 (DMPO 2016), the applicant has undertaken the necessary public consultation procedures prior to submitting a Major application. Subsequent amendments to the DMPO were made in 2020 in light of Coronavirus. The requirements are set out within Section 2.0 of this report.
- 1.1.4 Article 4 of the DMPO 2016 provides that, where an applicant has been required to carry out pre-application consultation, and submits an application for planning permission, that application must be accompanied by a Pre-Application Consultation report (PAC Report). This document is the PAC Report in respect of the above application.

2.0 PRE-APPLICATION CONSULTATION REQUIREMENTS

2.1 Overview

- 2.1.1 Pre-application consultation on Major Applications became a legal requirement in Wales for all major applications submitted on or after the 16th March 2016. The pre-application consultation requirements are set out within Article 4 of the DMPO 2016 (which provides for amendments to be inserted after Part 1 of the 2012 Order).

2.2 Statutory Publicity

- 2.2.1 Applicants are required to publicise a proposed application for a Major Development by giving requisite notice by site display in at least one place near the land to which the application relates for no less than 28 days (article 2C(1)(a)(i)); and in writing to any owner or occupier of any land adjoining the land to which the application relates (article 2C(1)(a)(ii)).

- 2.2.2 On 19th May 2020, the Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020 came into force ('2020 Order'). They have subsequently been extended twice. Most recently the Planning Applications (Temporary Modifications and Disapplication) (No. 3) (Wales) (Coronavirus) Order 2020 extended the provisions until 8 October 2021. The Orders brought in temporary changes in light of Coronavirus which the PAC had to accord with. They concerned making the PAC information available at a location in the vicinity. The additional guidance outlined has been followed to reflect the approach recently taken on a recent planning application for consistency.

Site Display

- 2.2.3 Four site notices (two in English and two in Welsh) were erected on the 29th June 2022 publicising the proposed application. These notices were attached in two separate locations on lamp posts along Holyhead Road. Photographs of the posted notices are provided at **Appendix A**. A copy of the Site Notice is provided at **Appendix B** in accordance with article 2F(2)(a)). Declaration that the notice was displayed in accordance with article 2C(1)(a)(i) is provided in **Appendix C**.

Owners / Occupiers

- 2.2.4 Notice was providing in writing to the owner / occupier of the land adjoining the land to which the application relates in accordance with article 2C(1)(a)(ii). The notice was sent on 29th June 2022. A copy of the notice sent to the owner / occupier is provided in **Appendix D** in accordance with article 2F(2)(c). Also in accordance with 2F(2)(c), the address of the owner / occupier is provided in Table 1 below.

Table 1

Neighbour Consultee Name	Neighbour Consultee Address
Owner / Occupier	Maesgwyn Farm Chirk Wrexham

Information available at a location in the vicinity

- 2.2.5 The GDPO 2016 requires applicants to make information relating to the proposed application available for inspection at a location in the vicinity of the Proposed Development for not less than 28 days. The 2020 Order replaced this with “making the information available on a website” and “sending hard copies of the documents...to any person who requests them...”
- 2.2.6 The information was also made available on the Axis PED website, which provided a summary of the consultation and links to each draft document¹.
- 2.2.7 A hard copy of the specified information in the form of a draft planning application was deposited at Reception, Kronospan, Holyhead Rd, Chirk, LL14 5NT for public viewing from 8:30am on 29th June 2022 for 28 days. A record of visitors was taken at the reception.
- 2.2.8 No members of the public visited the Kronospan site to view the draft planning application.

¹ <https://www.axisped.co.uk/consultations/>

- 2.2.9 A hard copy of the documents was provided for display in Chirk Parish Hall. They were delivered on 29th June 2022.

2.3 Statutory Consultation

Community Consultees

- 2.3.1 'Community Consultees' are defined within the DMPO 2016 as being each county or county borough councillor representing an electoral ward in which the land to which the proposed development relates, and each community council in whose area the land to which the proposed application relates.
- 2.3.2 Article 2D(2) of the DMPO 2016 requires that where an applicant is required to consult a Community Consultee, giving them notice in writing of the proposed application. Pursuant to Article 2D(2) the Councillor representing Chirk South ward on Wrexham Borough County Council (WCBC) and the Clerk of Chirk Town Council were consulted by notice in writing on the 25th February 2022. Copies of all notices given to Community Consultees are contained within **Appendix E**.

Specialist Consultees

- 2.3.3 'Specialist Consultees' are defined within Schedule 4 of the DMPO 2016. Article 2D(3) of the DMPO 2016 requires that where an applicant is required to consult a Specialist Consultee, then they must give them the notice in writing and enclose each of the documents that have been placed on public deposit (See Paragraph 2.2.4 above). Copies of all notices given to Specialist Consultees are contained within **Appendix F**.
- 2.3.4 Notice was provided in writing on the 25th February 2022, including a link to the Axis website which contained electronic versions of the application documents. This was sent to the following Specialist Consultees; Hafren Dyfrdwy, Dŵr Cymru, the Health and Safety Executive and the Welsh Ministers. The responses are considered below in Table 2, and the responses are included in **Appendix G** where received.
- 2.3.5 In addition, the consultation request sent to the Welsh Ministers was also sent to Cadw according to the email address listed on the 'Consulting and

notifying the Welsh Ministers on development proposals before applying for planning permission'. The pre-application consultation request was sent to Cadwplanning@gov.wales

3.0 CONSULTATION RESPONSES RECEIVED

- 3.1.1 The pre-application publicity and consultation process set out above has been undertaken in accordance with the provisions contained within the DMPO 2016 and subsequent 2020 Order.
- 3.1.2 Table 2 below sets out those bodies that have been consulted, the responses that have been received, a summary of the issues raised and details of how account has been taken of each response within the submitted application. In addition to the responses received from respective consultee bodies, the table also includes those representations received as a result of the publicity process.

Table 2 – Consultation Responses

Name of Consultee	Nature of Comment Received	Summary of Issues Raised	How Addressed within Application
Specialist Consultees			
Dwr Cymru	Comment	An application would be required to Dwr Cymru for any connection to the public sewer under the Water Industry Act 1991. The development would require approval of Sustainable Drainage (SuDs) features, and consultation with WCBC as the determining SuDS Approval Body (SAB) is recommended.	No connection to the public sewer is currently proposed, but if this changes an application under the Water Industry Act 1991 would be made. An application to the SAB would be made and the applicant will engage with WCBC in due course.
Welsh Ministers	No response received		

Name of Consultee	Nature of Comment Received	Summary of Issues Raised	How Addressed within Application
WCBC (Conservation Officer)	Objection	Whilst it is acknowledged that Kronospan is an industrial site which has sat within this extremely sensitive setting (adjacent to Chirk Conservation Area, the Pontcysyllte Aqueduct and Canal World Heritage Site, and within sight of the registered park and garden and listed garden structures at Chirk Castle) for some years, intensification of development at the site still has the potential to negatively impact upon this setting and should not be accepted in principle purely because of the sites current use. These proposals in particular impact upon views from the towpath of the canal (the WHS) and from areas of the Chirk Castle park and garden. The size of the proposed structures in this sensitive location to the western edge of the site would not be supported by WCBC policies relating to the world heritage site or TAN 24 regarding the historic environment.	Refer to Appendix H - Applicant Response to WCBC Conservation Officer Objection
Hafren Dyfrdwy	No response received		
Health and	Comment	While the proposed development lies in the consultation zone for	N/A

Name of Consultee	Nature of Comment Received	Summary of Issues Raised	How Addressed within Application
Safety Executive		the Kronospan major hazard site, if the proposed development when established will not result in a material increase in the number of persons working within or visiting the notified area there would be no need to consult HSE's Land Use Planning Advice team on this application and we would have no comments to make.	
CADW	No objection	CADW reviewed the application documentation, acknowledged that the impact would be "slight adverse", which will not be significant, and concurred with this conclusion. No objection raised in regard to heritage assets.	Heritage impacts are dealt with at Appendix B of the Planning Statement.
Community Consultees			
Chirk Town Council	Comment	The Council wishes to have clarification on: a) How many silos Kronospan currently have on site? b) What will each silo contain? c) Will the construction of the new silos ensure that the yard will stay clear and no longer be used for storage?	There are 6 raw timber material storage silos on the Kronospan Facility. The two proposed large storage silos would contain recycled timber (see Planning Statement for further details).

Name of Consultee	Nature of Comment Received	Summary of Issues Raised	How Addressed within Application
			The Proposed Development would not result in the outside yard no longer being used for storage, although the amount of available space for such storage would reduce slightly because of the Proposed Development.
Cllr Terry Evans	No comment received		
Local resident	Objection	a) Insufficient information has been provided regarding the design and installation of the 4 air vents (3 are relocating). What protection is provided when 3 are moved? b) There is no mention of the benefits to residents or employees in the Design and Access Statement (DAS); for example, will all open saw dust piles be removed from the log yard thus reducing dust and pollution together with	Further information is provided in the Air Quality Technical Note (Appendix 3 of the Planning Statement). The three existing bag filter boxes and associated exhaust stacks are covered under the existing two separate Environmental Permits under the

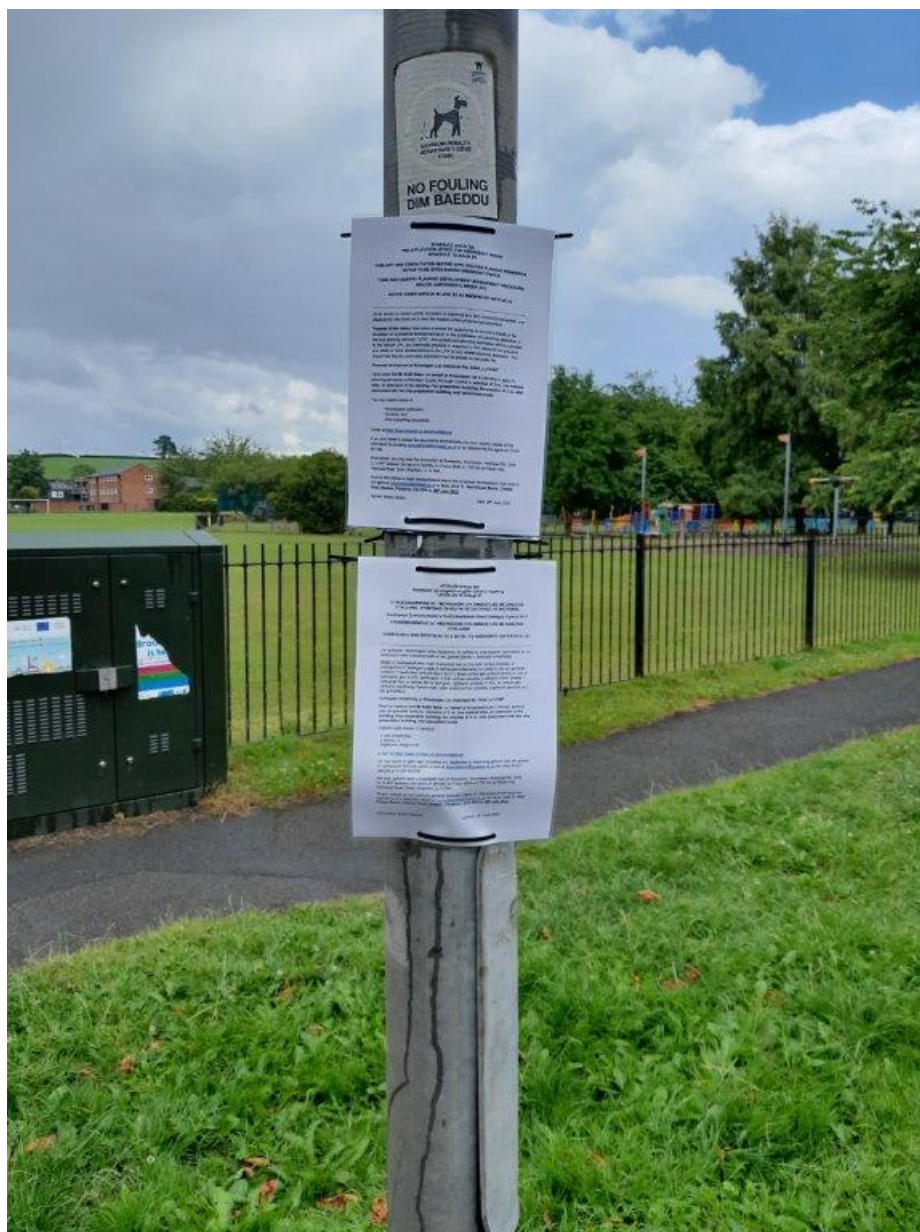
Name of Consultee	Nature of Comment Received	Summary of Issues Raised	How Addressed within Application
		reduced fire risk? c) The documentation set is incomplete – Appendix 3 of DAS for example.	Environmental Permitting Regulations 2016 (one by WCBC and one by Natural Resources Wales). These permits are currently in the process of being consolidated into one; an additional permit variation would be required for the additional bag filter box and exhaust stack. All relevant production processes will be offline whilst the bag filtration systems are being relocated. See response to Chirk Town Council above with respect to the slight reduction in outside storage. The reference in the DAS to Appendix 3 is a reference to LVIA

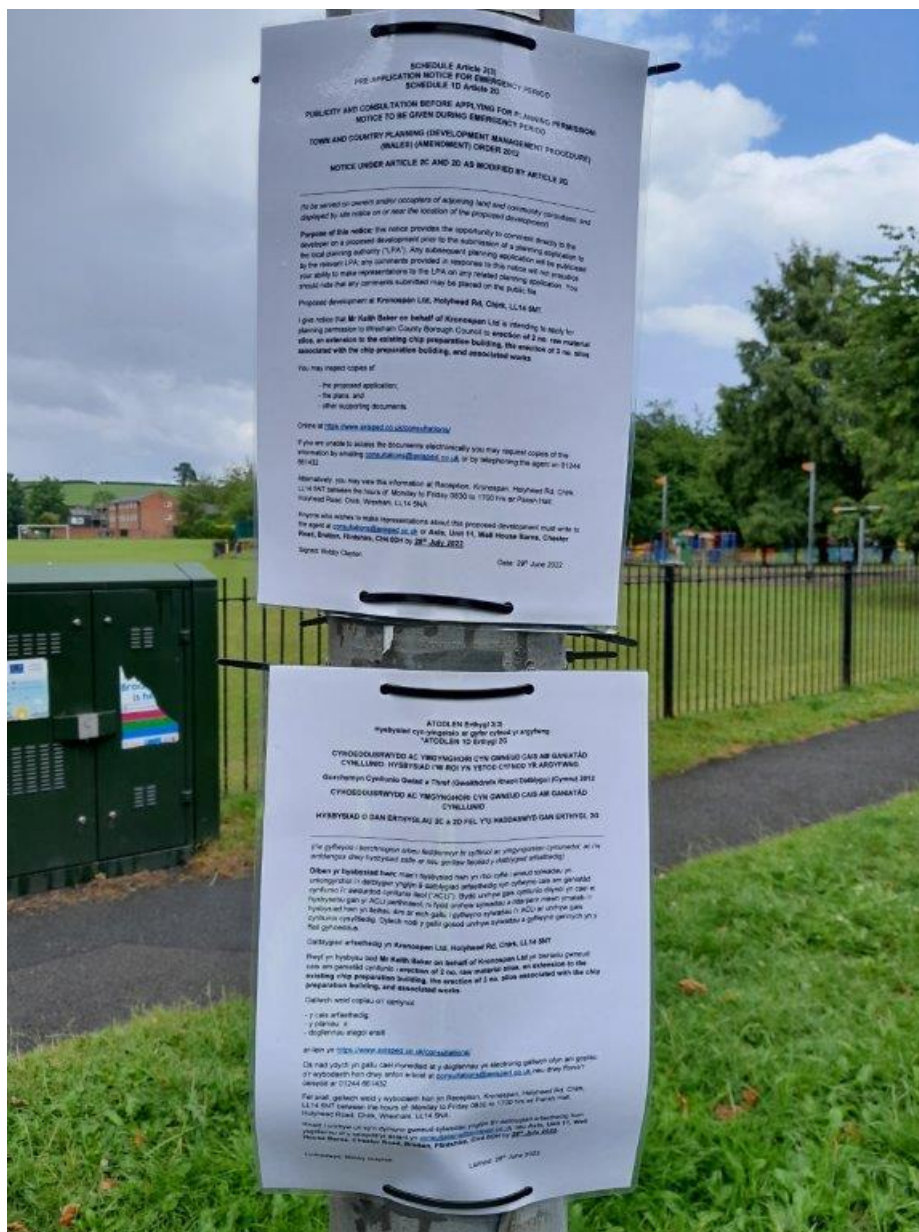
Name of Consultee	Nature of Comment Received	Summary of Issues Raised	How Addressed within Application
			Appendix 3 (rather than DAS Appendix 3). This has been corrected.

4.0 CONCLUSIONS

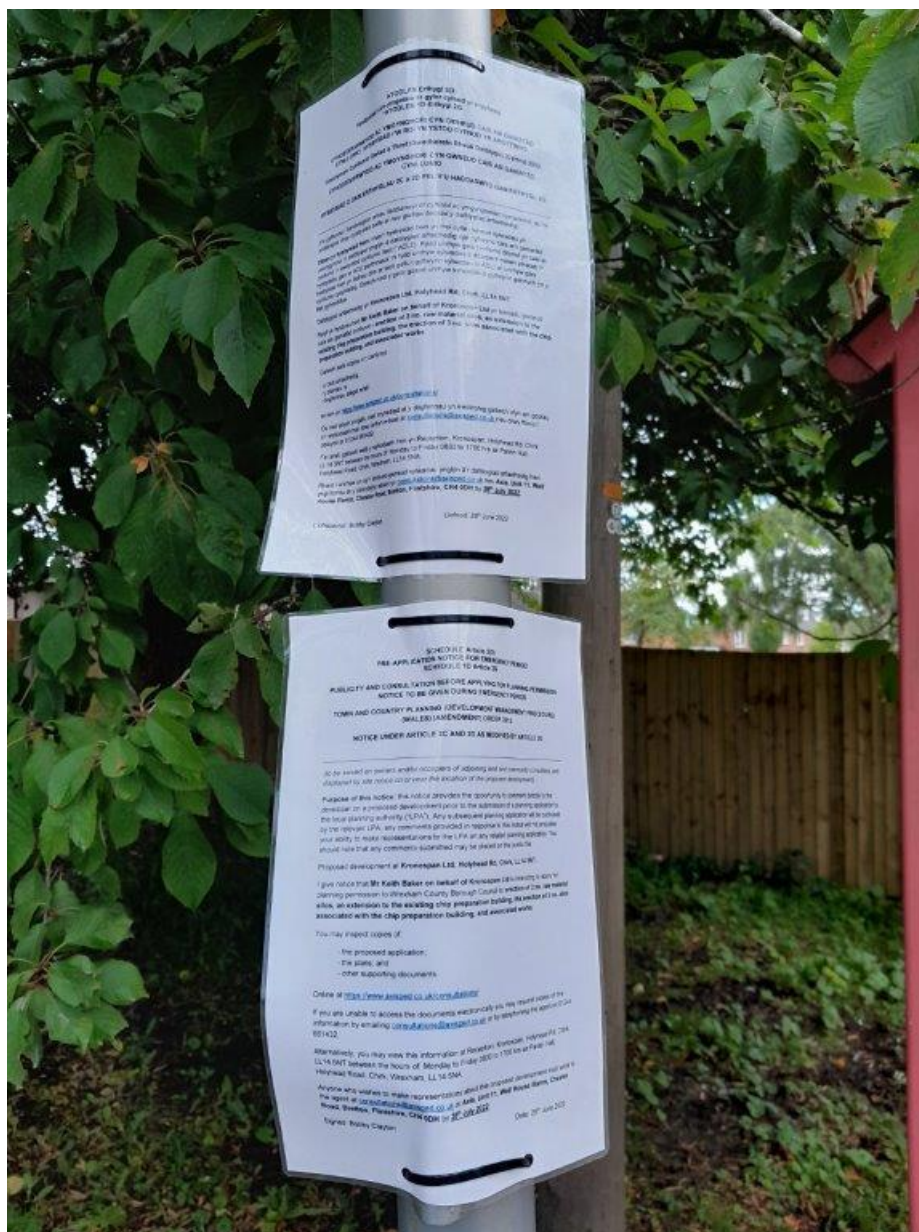
- 4.1.1 This document is the PAC Report and it has been prepared in accordance with the provisions of the DMPO 2016, and is submitted in support of an application made by Kronospan for the erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works.
- 4.1.2 The applicant has undertaken a formal pre-application consultation exercise in accordance with the requirements of the DMPO 2016 and subsequent 2020 Order.
- 4.1.3 Comments and representations received from this process have been logged and considered in the finalisation of the application documents. In accordance with the provisions of the DMPO 2016, the table above identifies the consultees / representor; the nature of their comment; the summary of issues raised; and where relevant, how that has been addressed within the application.

APPENDIX A











APPENDIX B

SCHEDULE 1C ARTICLE 2D

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(WALES) (AMENDMENT) ORDER 2012**

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

NOTICE UNDER ARTICLE 2D

(to be served on specialist consultees, as defined by article 2(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012)

Purpose of this notice: this notice comprises a formal request for a pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Proposed development at **Kronospan Ltd, Holyhead Rd, Chirk, LL14 5NT.**

I give notice that Mr Keith Baker on behalf of Kronospan Ltd is intending to apply for planning permission to Wrexham County Borough Council to **erect an engineering stores building, and ancillary works**

A copy of the proposed application; plans; and other supporting documents can be viewed online at <https://www.axisped.co.uk/consultations/> .

In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to the agent at Axis, Unit 11, Well House Barns, Chester Road, Bretton, Flintshire, CH4 0DH or by emailing consultations@axisped.co.uk by **28th July 2022**.

Signed: Bobby Clayton

Date: 29th June 2022

ATODLEN 1C Erthygl 2D

YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO

Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru)
2012

YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO

HYSBYSIAD O DAN ERTHYGL 2D

(i'w gyflwyno i ymgynghoreion arbenigol, fel y'u diffinnir gan erthygl 2(1) o Orchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012

Diben yr hysbysiad hwn: mae'r hysbysiad hwn yn ddeisyfiad ffurfiol am ymateb i ymgynghoriad cyn-ymgeisio o dan erthygl 2D o Orchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012.

Datblygiad arfaethedig yn **Kronospan Ltd, Holyhead Rd, Chirk, LL14 5NT.**

Rwyf yn hysbysu bod Mr Keith Baker on behalf of Kronospan Ltd.

Yn bwriadu gwneud cais am ganiatad cynllunio i to **erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works**

Mae copi o'r cais arfaethedig; planiau; a dogfennau ategol eraill wedi eu hatodi ar gael i'w harchwilio ar lein yn <https://www.axisped.co.uk/consultations/>.

Yn unol â gofynion erthygl 2E Orchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012, rhaid anfon ymateb i'r ymgynghoriad at Axis, Unit 11, Well House Barns, Chester Road, Bretton, Flintshire, CH4 0DH / e-bost consultations@axisped.co.uk erbyn **28th July 2022**.

Llofnodwyd: Bobby Clayton

Dyddiad: 29th June 2022

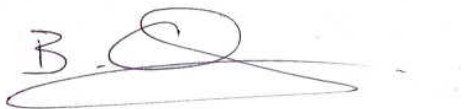
APPENDIX C

KRONOSPAN, CHIRK

**PLANNING APPLICATION FOR THE ERECTION OF 2 NO.
RAW MATERIAL SILOS, AN EXTENSION TO THE EXISTING
CHIP PREPARATION BUILDING, THE ERECTION OF 3 NO.
SILOS ASSOCIATED WITH THE CHIP PREPARATION
BUILDING, AND ASSOCIATED WORKS**

I hereby declare that the notice referred to in article 2C(1)(a)(i) of The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 was displayed in accordance with the requirements of that article (i.e. by site display in at least one place on or near the land to which the proposed application relates for not less than 28 days).

Signed on behalf of the Applicant:

A handwritten signature in blue ink, appearing to be 'B. Clayton', with a large, sweeping underline.

B Clayton

Date: 16th August 2022

APPENDIX D

Our Ref: 3046-01/CH

29th June 2022

Owner / Occupier
Maesgwyn Farm
Chirk
Wrexham

planning

transportation
planning

environment

design

Dear Sir / Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(WALES) (AMENDMENT) ORDER 2012**

**CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION FOR THE
ERECTION OF 2 NO. RAW MATERIAL SILOS, AN EXTENSION TO THE EXISTING CHIP
PREPARATION BUILDING, THE ERECTION OF 3 NO. SILOS ASSOCIATED WITH THE
CHIP PREPARATION BUILDING, AND ASSOCIATED WORKS**

I am writing to you in accordance with Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (hereafter referred to as the 'DMPO') and The Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020 (hereafter referred to as the '2020 Order').

The letter is to consult you in respect of a proposed application to be submitted by Kronospan Ltd. ('the applicant') to Wrexham County Borough Council ('the Local Authority') for the erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works, at Kronospan Ltd, Chirk, LL14 5NT.

Article 2 of the 2016 DMPO requires that applicants of major development proposals publicise proposed applications and consult in writing any owner or occupier of any land adjoining the land to which the proposed application relates. Therefore I am consulting you in accordance with the provisions of the DMPO. The documents are available to view at <https://www.axisped.co.uk/consultations/>.

The pre-application information prepared in support of the application has been placed on deposit at Reception, Kronospan, Holyhead Rd, Chirk, LL14 5NT for a period of 28 days.

Please could I ask that you provide any comments on the draft application documents in writing for my attention at the address given below (Chester Office), or to consultations@axisped.co.uk, to be received no later than the 28th July 2022.

Chester Office:
Well House Barns
Bretton
Chester
CH4 0DH

South Manchester Office:
Camellia House
76 Water Lane
Wilmslow
SK9 5BB

Registered Office

0844 8700 007
www.axisped.co.uk

... /2

Our Ref: 3046-01/CH

Yours faithfully,

Bobby Clayton

Bobby Clayton

Associate

Enc. NOTICE UNDER ARTICLES 2C AND 2D

APPENDIX E

Our Ref: 3046-01/CH

29th June 2022

Karen Brown
Chirk Town Council (Clerk)
Parish Hall
Holyhead Road
Chirk
Wrexham
LL14 5NA

planning

transportation
planning

environment

design

Dear Karen Brown,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(WALES) ORDER 2012**

**CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION FOR THE
ERECTION OF 2 NO. RAW MATERIAL SILOS, AN EXTENSION TO THE EXISTING CHIP
PREPARATION BUILDING, THE ERECTION OF 3 NO. SILOS ASSOCIATED WITH THE
CHIP PREPARATION BUILDING, AND ASSOCIATED WORKS**

I am writing to you in accordance with Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (hereafter referred to as the 'DMPO') and The Planning Applications (Temporary Modifications and Disapplication) (No. 3) (Wales) (Coronavirus) Order 2020 (hereafter referred to as the '2020 Order').

The letter is to consult you in respect of a proposed application to be submitted by Kronospan Ltd. ('the applicant') to Wrexham County Borough Council ('the Local Authority') erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works, at Kronospan Ltd, Chirk, LL14 5NT.

Article 2 of the DMPO requires that applicants of major development proposals publicise proposed applications and consult any 'community consultees' in accordance with the provisions of the DMPO.

In accordance with the amended provisions under the 2020 Order, the pre-application information prepared in support of the application has been made available to view at <https://www.axisped.co.uk/consultations/>. The documents will be available for a period of 28 days. Paper copies of the documents can be made available where the request is made within the 28-day period below. The pre-application information has also been placed on deposit at Reception, Kronospan, Holyhead Rd, Chirk, LL14 5NT for a period of 28 days.

Please could I ask that you provide any comments on the draft application documents in writing for my attention at the address given below (Chester Office), or to consultations@axisped.co.uk, to be received no later than the 28th July 2022.

Chester Office:
Well House Barns
Bretton
Chester
CH4 0DH

South Manchester Office:
Camellia House
76 Water Lane
Wilmslow
SK9 5BB

Registered Office

0844 8700 007
www.axisped.co.uk

... /2

Our Ref: 3046-01/CH

Yours sincerely,

Bobby Clayton

Bobby Clayton

Associate

Enc. NOTICE UNDER ARTICLES 2C AND 2D

Our Ref: 3046-01/CH

29th June 2022

Cllr Terry Evans
Brooklyn
13 Ceiriog Close
Chirk
Wrexham
LL14 5SB

planning

transportation
planning

environment

design

Dear Cllr Evans,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(WALES) ORDER 2012**

**CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION FOR THE
ERECTION OF 2 NO. RAW MATERIAL SILOS, AN EXTENSION TO THE EXISTING CHIP
PREPARATION BUILDING, THE ERECTION OF 3 NO. SILOS ASSOCIATED WITH THE
CHIP PREPARATION BUILDING, AND ASSOCIATED WORKS**

I am writing to you in accordance with Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (hereafter referred to as the 'DMPO') and The Planning Applications (Temporary Modifications and Disapplication) (No. 3) (Wales) (Coronavirus) Order 2020 (hereafter referred to as the '2020 Order').

The letter is to consult you in respect of a proposed application to be submitted by Kronospan Ltd. ('the applicant') to Wrexham County Borough Council ('the Local Authority') for the erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works, at Kronospan Ltd, Chirk, LL14 5NT.

Article 2 of the DMPO requires that applicants of major development proposals publicise proposed applications and consult any 'community consultees' in accordance with the provisions of the DMPO.

In accordance with the amended provisions under the 2020 Order, the pre-application information prepared in support of the application has been made available to view at <https://www.axisped.co.uk/consultations/>. The documents will be available for a period of 28 days. Paper copies of the documents can be made available where the request is made within the 28-day period below. The pre-application information has also been placed on deposit at Reception, Kronospan, Holyhead Rd, Chirk, LL14 5NT for a period of 28 days.

Please could I ask that you provide any comments on the draft application documents in writing for my attention at the address given below (Chester Office), or to consultations@axisped.co.uk, to be received no later than the 28th July 2022.

Chester Office:
Well House Barns
Bretton
Chester
CH4 0DH

South Manchester Office:
Camellia House
76 Water Lane
Wilmslow
SK9 5BB

Registered Office

0844 8700 007
www.axisped.co.uk

... /2

Our Ref: 3046-01-01/CH

Yours sincerely,

Bobby Clayton

Bobby Clayton
Associate

Enc. NOTICE UNDER ARTICLES 2C AND 2D

APPENDIX F

29th June 2022

Our Ref: 3046-01/CH

Dŵr Cymru Cyf
Linea
Fortran Road
St Mellons
Cardiff
CF3 0LT

planning
transportation
planning
environment
design

Dear Sir / Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(WALES) ORDER 2012**

**CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION FOR THE
ERECTION OF 2 NO. RAW MATERIAL SILOS, AN EXTENSION TO THE EXISTING CHIP
PREPARATION BUILDING, THE ERECTION OF 3 NO. SILOS ASSOCIATED WITH THE
CHIP PREPARATION BUILDING, AND ASSOCIATED WORKS**

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The letter is to consult you in respect of a proposed application to be submitted by Kronospan Ltd. ('the Applicant') to Wrexham County Borough Council ('the Local Authority') for the erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works, at Kronospan Ltd, Chirk, LL14 5NT.

Article 2 of the DMPO requires that applicants of major development proposals publicise proposed applications and consult any 'specialist consultees' in accordance with the provisions of the DMPO. Sewerage Undertakers are a 'specialist consultee' listed within Schedule 4 of the DMPO, and as such I am required to consult you in writing and provide you with the documents comprising the draft application. A hard copy of the documents is provided and they are also available to view at <https://www.axisped.co.uk/consultations/>.

Please could I ask that you provide any comments on the draft application documents in writing for my attention at the address given below (Chester Office), or to consultations@axisped.co.uk, to be received no later than the 28th July 2022 (which is 28 days from the date of this letter).

Chester Office:
Well House Barns
Bretton
Chester
CH4 0DH

South Manchester Office:
Camellia House
76 Water Lane
Wilmslow
SK9 5BB

Registered Office

0844 8700 007
www.axisped.co.uk

... /2

Our Ref: 3046-01/CH

Yours faithfully,

Bobby Clayton

Bobby Clayton

Associate

Enc. NOTICE UNDER ARTICLE 2D

29th June 2022

Hafren Dyfrdwy,
Packsaddle,
Wrexham,
LL14 4EH

planning

transportation
planning

environment

design

Dear Sir / Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(WALES) ORDER 2012**

**CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION FOR THE
ERECTION OF 2 NO. RAW MATERIAL SILOS, AN EXTENSION TO THE EXISTING CHIP
PREPARATION BUILDING, THE ERECTION OF 3 NO. SILOS ASSOCIATED WITH THE
CHIP PREPARATION BUILDING, AND ASSOCIATED WORKS**

I am writing to you in accordance with Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (hereafter referred to as the 'DMPO') and The Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020 (hereafter referred to as the '2020 Order').

The letter is to consult you in respect of a proposed application to be submitted by Kronospan Ltd. ('the applicant') to Wrexham County Borough Council ('the Local Authority') for the erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works, at Kronospan Ltd, Chirk, LL14 5NT.

Article 2 of the DMPO requires that applicants of major development proposals publicise proposed applications and consult any 'specialist consultees' in accordance with the provisions of the DMPO. Water Undertakers are a 'specialist consultee' listed within Schedule 4 of the DMPO, and as such I am required to consult you in writing and provide you with the documents comprising the draft application. A hard copy of the documents is provided and they are also available to view at <https://www.axisped.co.uk/consultations/>.

Please could I ask that you provide any comments on the draft application documents in writing for my attention at the address given below (Chester Office), or to consultations@axisped.co.uk, to be received no later than the 28th June 2022 (which is 28 days from the date of this letter)

... /2

Our Ref: 3046-01/CH

Yours faithfully,

Bobby Clayton

Bobby Clayton

Associate

Enc. NOTICE UNDER ARTICLE 2D

Our Ref: 3046-01/CH

29th June 2022

Health and Safety Executive
Regent House,
Regent Street
Wrexham
LL11 1PR

planning

transportation
planning

environment

design

Dear Sir / Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(WALES) ORDER 2012**

**CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION FOR THE
ERECTION OF 2 NO. RAW MATERIAL SILOS, AN EXTENSION TO THE EXISTING CHIP
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The letter is to consult you in respect of a proposed application to be submitted by Kronospan Ltd. ('the applicant') to Wrexham County Borough Council ('the Local Authority') for the erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works, at Kronospan Ltd, Chirk, LL14 5NT.

Article 2 of the DMPO requires that applicants of major development proposals publicise proposed applications and consult any 'specialist consultees' in accordance with the provisions of the DMPO. The Health and Safety Executive is a 'specialist consultee' listed within Schedule 4 of the DMPO, and as such I am required to consult you in writing and provide you with the documents comprising the draft application. A hard copy of the documents is provided and they are also available to view at <https://www.axisped.co.uk/consultations/>.

Please could I ask that you provide any comments on the draft application documents in writing for my attention at the address given below (Chester Office), or to consultations@axisped.co.uk, to be received no later than the 28th July 2022 (which is 28 days from the date of this letter).

Chester Office:
Well House Barns
Bretton
Chester
CH4 0DH

South Manchester Office:
Camellia House
76 Water Lane
Wilmslow
SK9 5BB

Registered Office

0844 8700 007
www.axisped.co.uk

... /2

Our Ref: 3046-01/CH

Yours faithfully,

Bobby Clayton

Bobby Clayton

Associate

Enc. NOTICE UNDER ARTICLE 2D

Our Ref: 3046-01/CH

29th June 2022

The Welsh Ministers
Cathays Park
Cardiff
CF10 3NQ

planning

transportation
planning

environment

design

Dear Sir / Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(WALES) ORDER 2012**

**CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION FOR THE
ERECTION OF 2 NO. RAW MATERIAL SILOS, AN EXTENSION TO THE EXISTING CHIP
PREPARATION BUILDING, THE ERECTION OF 3 NO. SILOS ASSOCIATED WITH THE
CHIP PREPARATION BUILDING, AND ASSOCIATED WORKS**

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The letter is to consult you in respect of a proposed application to be submitted by Kronospan Ltd. ('the applicant') to Wrexham County Borough Council ('the Local Authority') for the erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works, at Kronospan Ltd, Chirk, LL14 5NT.

Article 2 of the DMPO requires that applicants of major development proposals publicise proposed applications and consult any 'specialist consultees' in accordance with the provisions of the Order. The Welsh Ministers are a 'specialist consultee' listed within Schedule 4 of the DMPO, and as such I am required to consult you in writing and provide you with the documents comprising the draft application. A hard copy of the documents is provided and they are also available to view at <https://www.axisped.co.uk/consultations/>.

Please could I ask that you provide any comments on the draft application documents in writing for my attention at the address given below (Chester Office), or to consultations@axisped.co.uk, to be received no later than the 28th July 2022 (which is 28 days from the date of this letter).

Chester Office:
Well House Barns
Bretton
Chester
CH4 0DH

South Manchester Office:
Camellia House
76 Water Lane
Wilmslow
SK9 5BB

Registered Office

0844 8700 007
www.axisped.co.uk

... /2

Our Ref: 2936-01/CH

Yours faithfully,

Bobby Clayton

Bobby Clayton

Associate

Enc. NOTICE UNDER ARTICLE 2D

APPENDIX G

Erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works, Kronospan, Chirk.

axis

Pre-Application Consultation Response Form

Name: [REDACTED]

Address: [REDACTED]

Reason(s) for your interest in the proposed development:

LOCAL RESIDENT

Please tick one of the following options:

I am in favour of the proposed development	☐
I am neither in favour nor against the proposed development	☐
I am against the proposed development	☒

Reason(s) for choice:

- 1 INSUFFICIENT INFORMATION HAS BEEN PROVIDED REGARDING THE DESIGN AND INSTALLATION OF THE 4 AIR VENTS (3 ARE RELOCATING) WHAT PROTECTION IS PROVIDED WHEN 3 ARE MOVED?
- 2 THERE IS NO MENTION OF THE BENEFITS TO RESIDENTS OR EMPLOYEES IN DESIGN AND ACCESS STATEMENT. FOR EXAMPLE WILL ALL OPEN SAW DUST PILES BE REMOVED FROM THE LOG YARD THUS REDUCING DUST AND POLLUTION TOGETHER WITH REDUCED FIRE RISK.
- 3 THE DOCUMENTATION SET IS INCOMPLETE - APPENDIX 3 OF DESIGN AND ACCESS

Signed: STATEMENT FOR EXAMPLE

ORR

Date:

25/7/22

Upon completion, please return this form by post or email by 28th July 2022 to:

Axis PED Ltd, Unit 11, Well House Barns, Chester Road, Chester CH4 0DH

consultations@axisped.co.uk

We value your opinions and would like to thank you for taking the time to complete this form.

Erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works, Kronospan, Chirk.

axis

Pre-Application Consultation Response Form

Name: Kathryn Moore

Address: Wrexham County Borough Council, Planning and Regulatory, 16 Lord Street, Wrexham, LL11 1LG

Reason(s) for your interest in the proposed development:

Conservation Officer for Wrexham County Borough Council

Please tick one of the following options:

I am in favour of the proposed development	☐
I am neither in favour nor against the proposed development	☐
I am against the proposed development	☒

Reason(s) for choice:

Whilst it is acknowledged that Kronospan is an industrial site which has sat within this extremely sensitive setting (adjacent to Chirk Conservation Area, the Pontcysyllte Aqueduct and Canal World Heritage Site, and within sight of the registered park and garden and listed garden structures at Chirk Castle) for some years. intensification of development at the site still has the potential to negatively impact upon this setting and should not be accepted in principle purely because of the sites current use. These proposals in particular impact upon views from the towpath of the canal (the WHS) and from areas of the Chirk Castle park and garden. The size of the proposed structures in this sensitive location to the western edge of the site would not be supported by WCBC policies relating to the world heritage site or TAN 24 regarding the historic environment

Signed: Kathryn Moore

Date: 27/07/2022

Upon completion, please return this form by post or email by 28th July 2022 to:

Axis PED Ltd, Unit 11, Well House Barns, Chester Road, Chester CH4 0DH

consultations@axisped.co.uk

We value your opinions and would like to thank you for taking the time to complete this form.

Hannah Shine

From: LUP enquiries <LUPenquiries@hse.gov.uk>
Sent: 11 July 2022 11:36
To: Hannah Shine
Cc: Bobby Clayton
Subject: RE: Proposed Extension to the Chip Preparation Building and Silos, Kronospan, Chirk - Welsh Pre-application Consultation - HSE

Dear Hannah,

Thank you for getting back to HSE's Land Use Planning advice team on the pre-application consultation for an extension to the Chip Preparation Building and Silos at Kronospan, Chirk.

HSE is a statutory consultee for certain developments within the Consultation Zones of major hazard sites and major accident hazard pipelines, including more than 500m² of office floor space and more than 750m² of floor space to be used for an industrial process.

While the proposed development lies in the consultation zone for the Kronospan major hazard site, if the proposed development when established will not result in a material increase in the number of persons working within or visiting the notified area there would be no need to consult HSE's Land Use Planning Advice team on this application, and we would have no comments to make.

We hope that this takes the pre-application forward.

Kind regards

Richard Lomax

Land Use Planning Advice team

Chemicals Explosives Microbiological Hazards Division 5B



Redgrave Court, Merton Road, Bootle, Merseyside, L20 7HS

Please send enquiries on Land Use Planning to lupenquiries@hse.gov.uk

HSE's Land Use Planning web app is at <https://pa.hsl.gov.uk/>

Please note that aspects of this service may incur a fee for business users.

From: Hannah Shine <hannahshine@axisped.co.uk>
Sent: 11 July 2022 08:58
To: LUP enquiries <LUPenquiries@hse.gov.uk>
Cc: Bobby Clayton <bobbyclayton@axisped.co.uk>
Subject: RE: Proposed Extension to the Chip Preparation Building and Silos, Kronospan, Chirk - Welsh Pre-application Consultation - HSE

Hi Richard,

Many thanks for your confirmation. We can confirm that the application will **not** result in a material increase to the number of people working at the site. The application is sought to streamline operations at the Kronospan Facility.

Please let me know if you need anything further from us.

Kind regards,

Hannah,

Hannah Shine
Senior Consultant



hannahshine@axisped.co.uk

T: 0844 8700 007* | M: 07422 655592

Camellia House, 76 Water Lane, Wilmslow, Cheshire, SK9 5BB

www.axisped.co.uk

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From: LUP enquiries <LUPenquiries@hse.gov.uk>

Sent: 08 July 2022 15:23

To: Hannah Shine <hannahshine@axisped.co.uk>

Cc: Bobby Clayton <bobbyclayton@axisped.co.uk>

Subject: RE: Proposed Extension to the Chip Preparation Building and Silos, Kronospan, Chirk - Welsh Pre-application Consultation - HSE

Dear Hannah,

Thank you for contacting HSE's Land Use Planning advice team about pre-application advice on the proposed planning application to extend the Chip Preparation Building and Silos, Kronospan, Chirk.

HSE is a statutory consultee for certain developments within the Consultation Zones of major hazard sites and major accident hazard pipelines.

These types of development include:

- more than 500m² of office floor space;
- more than 750m² of floor space to be used for an industrial process;
- or developments which are otherwise likely to result in a material increase in the number of persons working within or visiting the notified area.

We also understand that the proposed development is in the consultation zone for the Kronospan major hazard site.

Therefore can you clarify whether the proposed developments will result in a material increase in the number of people working within or visiting the site, and if so how many people will be at the site?

We look forward to hearing from you.

Kind regards

Richard Lomax

Land Use Planning Advice Team | Chemical, Explosives and Microbiological Hazards Division 5B | Health and Safety Executive

Redgrave Court, Merton Road, Bootle, Merseyside, L20 7HS

<https://www.hse.gov.uk/landuseplanning/index.htm>



Please send enquiries on Land Use Planning to lupenquiries@hse.gov.uk

HSE's Land Use Planning web app is at <https://pa.hsl.gov.uk/>

Please note that aspects of this service may incur a fee for business users.

On 1 August 2021 HSE became a statutory consultee with regard to building safety (in particular to fire safety aspects) for planning applications that involve a relevant building.

A relevant building is defined in the planning guidance at gov.uk as:

- containing two or more dwellings or educational accommodation and
- meeting the height condition of 18m or more in height, or 7 or more storeys

The relevant HSE team can be contacted by email via the PlanningGatewayOne@hse.gov.uk. There is further information at <https://www.gov.uk/guidance/fire-safety-and-high-rise-residential-buildings-from-1-august-2021>.

From: Hannah Shine <hannahshine@axisped.co.uk>

Sent: 07 July 2022 17:05

To: LUP enquiries <LUPenquiries@hse.gov.uk>

Cc: Bobby Clayton <bobbyclayton@axisped.co.uk>

Subject: Proposed Extension to the Chip Preparation Building and Silos, Kronospan, Chirk - Welsh Pre-application Consultation - HSE

Good afternoon,

Please find attached a letter and notice to notify you of our pre-application consultation which started on Wednesday 29th June 2022. We posted a letter by Special Delivery but can see via the postal tracking system that the delivery attempt failed, and that the letter has not been collected from the Wrexham post office.

AXIS has been commissioned by Kronospan to prepare a detailed planning application for the erection of 2 no. raw material silos, an extension to the existing chip preparation building, the erection of 3 no. silos associated with the chip preparation building, and associated works.

The consultation website can be found here: <https://www.axisped.co.uk/erection-of-2-no-raw-material-silos-an-extension-to-the-existing-chip-reparation-building-the-erection-of-3-no-silos-associated-with-the-chip-preparation-building-and-associated-works/>

If you have any questions about this planning application, please contact my colleague Bobby Clayton cc'd in.

Kind regards,

Hannah

Hannah Shine
Senior Consultant



hannahshine@axisped.co.uk

T: 0844 8700 007* | M: 07422 655592

Camellia House, 76 Water Lane, Wilmslow, Cheshire, SK9 5BB

www.axisped.co.uk

Visit our updated website www.axisped.co.uk to see the projects we've been working on.



Please note : Incoming and outgoing email messages are routinely monitored for compliance with our policy on the use of electronic communications and may be automatically logged, monitored and / or recorded for lawful purposes by the GSI service provider.

Interested in Occupational Health and Safety information?

Please visit the HSE website at the following address to keep yourself up to date

www.hse.gov.uk



CHIRK TOWN COUNCIL
CYNGOR TREF Y WAUN

Clerk
Karen Brown
Clerc

Tel: 01691 772596
Email: info@chirktowncouncil.org.uk

Parish Hall
Holyhead Road
Chirk
Wrexham
LL14 5NA

25th July 2022

Mr Bobby Clayton
Axis
Well House Barns
Bretton
Chester
CH4 0DH

Dear Mr Clayton

Town and Country Planning (Development Management Procedure) Wales Order 2012

The Council has given due consideration to the consultation on the pre-application for the erection of 2 raw material silos, an extension to the existing chip preparation building, the erection of 3 silos associated with the chip preparation building, and associated works at Kronospan, Chirk.

The Council wishes to have clarification on:

- how many silo's Kronospan currently have on site?
- What will each silo contain, new and old?
- Will the construction of the new silos ensure that the yard will stay clear and no longer be used for storage?

I shall be glad if you ensure that the comments made by the Council are addressed fully in your planning application.

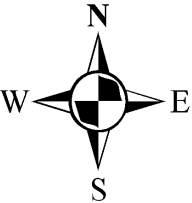
Yours sincerely,

Rebecca Ap Gwyn
Dirprwy Glerc y Dref/Deputy Town Clerk
Cyngor Tref Y Waun / Chirk Town Council



Dŵr Cymru
Welsh Water

PPA0006916



LEGEND(Representative of most common features)

Waste network:			
	Foul chamber		Outfall
	Surface water chamber		Lamphole
	Combined chamber		Storm Overflow
	Combined sewer overflow		Rising main
	Special purpose chamber		Gravity sewer
	Treatment works		Private sewer
	Pumping station		Private sewer subject to Sect. 104 adoption agreement
NB: Sewer symbol colour indicates the type.			
RED	- Combined		Private Sewer Transfer
GREEN	- Surface Water		Lateral Drain
BROWN	- Foul		Inspection Chamber
Purple	- Former S24 sewers (for indicative purposes only)		

Notes:

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be asbestos cement (AC) or Pitch Fibre (PF) . It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation

Dŵr Cymru Cyfyngedig ('the Company') gives this information as to the position of its underground apparatus by way of general guidance only and on the strict understanding that it is based on the best information available and no warranty as to its correctness is relied upon in the event of excavations or other works made in the vicinity of the company's apparatus. The onus of locating apparatus before carrying out any excavations rests entirely on you. The information which is supplied by the Company, is done so in accordance with statutory requirements of sections 198 and 199 of the Water Industry Act 1991 which is based upon the best information available and, in particular, but without prejudice to the generality of the foregoing, it should be noted that the records that are available to the Company may not disclose the existence of a water main, service pipe, sewer, lateral drain or disposal main and any associated apparatus laid before 1 September 1989, or, if they do, the particulars thereof including their position underground may not be accurate. It must be understood that the furnishing of this information is entirely without prejudice to the provision of the New Roads and Street Works Act 1991 and the Company's right to be compensated for any damage to its apparatus.

Service pipes are not generally shown but their presence should be anticipated.

EXACT LOCATIONS OF ALL APPARATUS
TO BE DETERMINED ON SITE.

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Map Ref: 328505,338270
Map scale: 1:1250
Printed by: Lester Barrow
Printed on: 15 Jul 2022

Bobby Clayton
Axisped

By E-mail

Eich cyfeirnod
Your reference
3046-01/CH

Ein cyfeirnod
Our reference

Dyddiad
Date
9 August 2022

Llinell uniongyrchol
Direct line
0300 0257894

Ebost
Email:
cadwplanning@gov.wales

Dear Mr Clayton

Statutory Pre-Planning Application – Two raw material silos, an extension to the existing chip preparation building at Kronospan, Chirk

Thank you for your letter of 3 August inviting our comments on the information submitted for the above planning application.

Advice

Having carefully considered the information provided, we have no objection to the proposed development in regard to the scheduled monuments or registered historic parks and gardens listed in our assessment of the application below.

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

Assessment

Scheduled Monuments

DE117 Castell y Waun Castle Mound
DE133 Offa's Dyke: Caeau-Gwynion Section
DE135 Offa's Dyke: Chirk Park Section extending NE from the Lake
DE175 Pontcysyllte Aqueduct and Canal
DE198 Offa's Dyke: Chirk Park Section extending 340m NE of Home Farm
DE288 The Holyhead Road: the Chirk Embankment and earlier trackways

Registered Parks and Gardens:

PGW(C)15(WRE) Brynkinalt
PGW(C)63(WRE) Chirk Castle

World Heritage Sites

Pontcysyllte Aqueduct and Canal

The application will be accompanied by a Heritage Desk-Based Assessment produced by Archaeology Wales which has considered the impact of the proposed development on the above designated historic assets and their settings. It has concluded that at worst it will have a slight adverse effect, which will not be significant. We concur with this conclusion.

Yours sincerely

Nick Segust
Casework Officer
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.

APPENDIX H

PROPOSED KRONOSPAN CHIP PREPARATION BUILDING EXTENSION AND RAW MATERIALS SILOS:

Response to WCBC Conservation Officer Comments: August 2022

Introduction

1. A draft planning application for the proposed Extension to the existing Chip Preparation Building, three associated Storage Silos, two additional new Raw Materials Storage Silos and associated works (the Proposed Development) was submitted to Wrexham County Borough Council (WCBC) in June 2022.
2. The draft planning submission included a suite of documents, including a Landscape and Visual Impact Assessment (LVIA), and a Cultural Heritage Assessment (CHA).
3. Subsequent to this, comments have been received regarding the draft submission from the WCBC Conservation Officer. The Conservation confirmed that she is against the Proposed Development for the following reason:
4. *"Whilst it is acknowledged that Kronospan is an industrial site which has sat in this extremely sensitive setting (adjacent to Chirk Conservation Area, the Pontcysyllte Aqueduct and Canal World Heritage Site, and within sight of the registered park and garden and listed garden structures at Chirk Castle) for some years. intensification of development at the site still has potential to negatively impact upon this setting and should not be accepted in principle purely because of the sites current use. These proposals in particular impact upon views from the towpath of the canal (the WHS) and from areas of the Chirk Castle park and garden. The size of the proposed structures in this sensitive location to the western edge of the site would not be supported by WCBC policies relating to the world heritage site or TAN24 regarding the historic environment".*
5. This document comprises the Applicant's response to the Conservation Officer's comments.

The Proposed Development

6. The Proposed Development is described in detail in the Planning Statement that formed part of the draft planning submission. In summary, the Proposed

Development would be located within an area of existing hard standing within the wider Kronospan site, and would comprise:

- 2 no. new raw materials storage silos
 - height of approximately 33.5m;
 - appearance similar to the nearby existing silos (2 no. height approximately 32m, and 2 no. height approximately 25m);
- An extension to the existing chip preparation building:
 - No change to the height of the building, which would remain at approximately 29m;
 - An increase in the footprint of the building;
 - 3 no. new silos, with a height of approximately 24m;
 - The repositioning of 3 no. associated filter boxes, and the provision of 1 no. new filter box.

The Applicant's Landscape and Visual Impact Assessment

7. The LVIA included in the draft planning submission was prepared by AXIS, a registered practice of the Landscape Institute. The LVIA was undertaken by a Chartered Member of the Landscape Institute (CMLI) with over fifteen years' post qualification experience in the landscape and visual impact assessment of major infrastructure projects. The LVIA was directed and reviewed by a second CMLI with over twenty-five years' similar experience. Both have been involved with a range of different development proposals at the wider Kronospan site over a period of more than ten years.
8. The LVIA considers the effects of the Proposed Development upon the character of the surrounding landscape and upon views from the surrounding area. In particular, a detailed assessment of visual effects was undertaken from sixteen viewpoint locations. Viewpoint locations were identified on the basis of previous engagement with Wrexham Borough Council and statutory consultees (including the National Trust) relating to previous development proposals at the Kronospan site.
9. Of these sixteen viewpoints, four (Viewpoints J, K, M and N) are located along the canal towpath (i.e. within the World Heritage Site), and five (Viewpoints D, H, L, Q and R) are located within or at the boundary of the Chirk Castle estate (i.e. within the Registered Park and Garden). Of the remaining seven viewpoints, all bar one (Viewpoint B) are located within the essential setting of the WHS.

10. Photomontages illustrating the change in view that would occur as a result of the Proposed Development were prepared from Viewpoints C, E, I and M, these being locations where clear views of the proposed changes are anticipated. Appendix 2 of the LVIA provides a methodology setting out how viewpoint photography was taken and how the photomontages were produced.
11. In respect of effects upon landscape character, paragraph 4.6 of the LVIA concludes that:

“In summary, the Proposed Development would comprise a limited addition to the existing assemblage of structures within the wider Kronospan site. Whilst the new structures would be large in their own right, they would be in keeping with the size and scale of existing structures and be very similar to these in form and materials. From within much of Chirk, the existing structures at the wider Kronospan site, and vegetation cover within the town would screen the new structures. Similar screening would be provided from along much of the canal corridor, and from the more formal areas of the Chirk Castle estate. The underlying landscape characteristics of the two LCAs within the Study Area would remain as at baseline, with only very limited, localised and incremental change in the visual context of the landscape occurring. The effects of this would be negligible and would not be significant”.
12. With regard to visual effects, paragraph 4.7-4.8 of the LVIA notes that:
13. *“...In summary, none of the viewpoints would experience significant visual effects, and at three of the viewpoints the Proposed Development would not be visible due to intervening vegetation cover.*
14. *The Proposed Development would be introduced into the wider Kronospan site where many large-scale industrial structures are already present and are often visible from locations in the surrounding area. The new structures would always be viewed in the context of the existing development at Kronospan and would appear as an extension to this, rather than as a separate feature”.*
15. Paragraph 4.12 of the LVIA concludes that:

“The Proposed Development would result in only a limited and incremental change to the assemblage of elements within the wider Kronospan site. Several of the existing structures are larger than the Proposed Development in terms of height or floorspace. The site as a whole has a well-established influence upon views across

the surrounding landscape and the various structures are familiar features. The further presence of the new structures forming part of the Proposed Development would have little or no appreciable effect upon this influence”.

16. The overall conclusions regarding the landscape and visual effects of the Proposed Development are set out in paragraph 6.1 of the LVIA as follows:

“The Proposed Development would be introduced into an existing large-scale industrial site that is an established influence upon the town of Chirk and the surrounding rural area. Views of existing tall, bulky structures at the Kronospan site are commonplace from within the study area and their presence is an established part of the character of the landscape. The further presence of the Proposed Development would not result in only very limited and incremental to this established influence upon the landscape and upon views. Neither the landscape effects nor the visual effects of the Proposed Development would be significant”.

The Applicant’s Cultural Heritage Assessment

17. The CHA included in the draft planning submission was prepared by Archaeology Wales, a registered organisation with the Chartered Institute for Archaeologists. The CHA was completed by a member of the Chartered Institute of Archaeology with over seven years’ of experience in heritage impact assessments of various infrastructure projects of a variety of complexity.
18. The CHA considers potential effects upon the historic environment, including upon the setting of heritage assets.
19. In relation to the Chirk Castle Registered Park and Garden (RPG), paragraph 8.12 of the CHA concludes that:

“...given the position of the proposed development within an industrial complex, the development will be observed against an already heavily impacted landscape. Further understandings of the impacts that the proposed development may have over the asset may be considered with the production of a Settings Assessment. The latter may be able to quantify the impact that all proposed developments within the industrial complex will have on the Registered Park and Garden which is, in turn, part of the Setting of the WHS”

20. Overall conclusions are set out in paragraph 9.3 of the CHA, as follows:

“The proposed development will have a very slight to negligible impact on the Essential Setting of the WHS. This is because it is located within an area already heavily developed and also because its design will be in keeping with the pre-existing industrial character of the Kronospan site as a whole”.

21. The conclusions made in respect of effects upon the setting of the WHS reflect the key contribution made to this by the Chirk Castle RPG.

Mitigation provided as part of previous developments

22. In 2016, WCBC granted planning permission for a Recycled Storage Facility (RCF) at the Kronospan site (ref. P/2016/0219). One of the conditions attached to the planning permission was to provide a landscape strategy to mitigate the visual impact of development from public viewpoints. A similarly worded condition was also attached to other earlier planning permissions.
23. As such, a landscape strategy was developed for the wider Kronospan site, which was approved by WCBC in 2018. The landscape strategy made provision for a series of different areas of native planting at locations where this was deemed to be desirable to screen views towards the wider Kronospan site. All planting within areas under the control of Kronospan has subsequently been implemented. This includes belts of new woodland planting immediately east of the canal corridor, close to Chirk Marina, and along the minor road immediately east of the Chirk Castle Estate, close to the main entrance gates.
24. The newly planted areas can be seen on online aerial imagery and are also visible on the photography prepared from Viewpoints I and J (LVIA Figures 2i and 2j). The planting is very young and once established will provide a dense belt of screening vegetation. Summer photography from the two Viewpoints demonstrates the screening value of the new vegetation and will be included in the final LVIA.

Effects upon Chirk Castle Registered Park and Garden

25. The Proposed Development would not be visible from the majority of Chirk Castle Registered Park and Garden. In particular, it would not be visible from the adjacent formal garden and terrace or any the listed structures in the garden or at the Castle itself. Zone of Theoretical Visibility (ZTV) mapping will be included in the final LVIA to demonstrate the visibility of existing structures at the wider Kronospan site and the additional visibility of the Proposed Development.

26. The photography prepared from Viewpoint H (LVIA Figure 2h) illustrates the views towards the Proposed Development from the terrace at the eastern edge of the formal gardens. Additional winter viewpoint photography from the Castle itself will be included in the final LVIA.
27. The areas where clearer views towards the Proposed Development would be available are located towards the eastern edge of the Chirk Castle estate. This is a relatively exposed area located on an east-facing slope and separated from the more central areas of the estate by blocks of mature woodland. Even from these locations, tree cover often provides considerable screening (refer to LVIA Figures 2l and 2o – Viewpoints L and Q). Existing structures within the wider Kronospan site are already clearly visible, and there would be only incremental change in view as a result of the Proposed Development. This can be seen by reference to the viewpoint photography prepared from Viewpoints L, Q and R.
28. The nature of the views available from the eastern edge of the Chirk Castle Registered Park and Garden would undergo very little change as a result of the introduction of the Proposed Development. Existing structures at the wider Kronospan site are already visible, and some of these structures are considerably larger and more prominent than the Proposed Development would be.
29. Even in the worst-case, where the Proposed Development would not be screened by intervening features, such as for example at Viewpoint R, the view would continue to be an expansive one where large-scale industry is evident in the middle ground. As set out in Appendix 5 of the LVIA, visual effects would be minor adverse at worst.
30. This very limited change in view would not appreciably increase the well-established influence of the Kronospan site upon its surroundings. Consequently, any change in the setting of the Registered Park and Garden, or any of the listed features within it is likely to be negligible at worst.

Effects upon the World Heritage Site

31. Views from the canal towpath towards the existing structures at the wider Kronospan site are generally very well screened. Much of the canal corridor to the south and west of the wider Kronospan site runs through a wooded cutting, and there are no views from here. To the north of the wider Kronospan site the canal is largely at grade, but vegetation cover to the east screens the majority of views. There is some limited visibility through localised gaps in vegetation (refer to LVIA Figure 2j –

Viewpoint J), but the Proposed Development would be wholly screened by existing tree cover.

32. Clearer views are available from a short section of the canal corridor immediately north-west of the Site. From an approximately 300m length of the canal and towpath, views are more open. The railway corridor immediately east of the canal is very evident raised on an embankment. Existing structures within the Kronospan site are clearly visible, and the close board perimeter fence at the site boundary is also a conspicuous presence. For an illustration of the existing views available from this stretch of the canal, refer to LVIA Figures 2k, 2m and 2n (Viewpoints K, M and N). Figure 2m also includes a photomontage from Viewpoint M illustrating how the view would change as a result of the Proposed Development.
33. It should be noted that the summer views from this area are different from the winter views. Vegetation along the canalside and along the railway embankment provides considerable additional screening of views, and such summer visibility is likely to be appreciably different to that experienced in winter. Summer photography from Viewpoint K will be included in the final LVIA.
34. The nature of the views available from the canal corridor would undergo very little change as a result of the introduction of the Proposed Development. Views would continue to be largely screened by dense vegetation cover. From the 300m stretch of the canal corridor immediately north-west of the wider Kronospan site, the views would continue to be characterised by the presence of industrial structures and associated fencing.
35. The Proposed Development would screen some of the existing structures from view, effectively replacing views of these with the proposed new structures. From locations very close to the wider Kronospan site, for example at Viewpoint K, the new structures would be located closer to the canal corridor, and hence would be more prominent than existing structures. However, as noted in Appendix 5 of the LVIA, the presence of large scale industry in close proximity to this stretch of the canal corridor is well established, and the nature of the views available looking southwards from the Viewpoint would not undergo extensive change. Effects would be moderate adverse.
36. From further north, for example at Viewpoints M and N, the introduction of the Proposed Development would simply replace the views of one set of industrial structures (i.e. some of the existing structures), with another (the proposed new

structures). This is illustrated by the photomontage prepared from Viewpoint M (LVIA Figure 2m). The influence of the wider Kronospan site upon views from the canal corridor would not change appreciably. Effects would be minor to moderate adverse at worst.

37. From viewpoints within the wider setting of the WHS, visual effects would be no greater than minor to moderate adverse. Where visible, the Proposed Development would always be seen in the context of the existing structures at the wider Kronospan site, which exert a well-established influence upon the landscape and upon views across it. I.e. the presence of the wider Kronospan site is a well-established component of the essential setting of the WHS.
38. The further presence of the Proposed Development would not result in any appreciable change of note in the influence of the assemblage of industrial structures upon either the WHS or its essential setting. Whilst there would be some limited and localised increase in the visual influence of industrial structures and an incremental change in character within the essential setting, this would not affect the character of the WHS itself, or the authenticity and integrity of the designation. None of the physical features within the WHS would be affected, nor would any usage of the canal and towpath be disrupted. The sense of arrival to the WHS would also be unaffected in a context where existing structures at the wider Kronospan site are locally prominent. This is borne out in the conclusions of the CHA as reported above (i.e., change in the essential setting of the WHS would be very slight to negligible).

Summary and Conclusions

39. The draft planning submission made in relation to the Proposed Development includes a Landscape and Visual Impact Assessment (LVIA) and a Cultural Heritage Assessment (LVIA). Both assessments were undertaken by suitably qualified and competent professionals.
40. The LVIA is accompanied by a series of photographs and photomontages from locations in the surrounding area, including from along the Llangollen Canal towpath (within the World Heritage Site) and from within the Chirk Castle Registered Park and Garden. The LVIA concludes that landscape and visual effects would not be significant.

41. The CHA considers effects upon the essential setting of the Pontcysyllte Aqueduct and Canal World Heritage Site and concludes that effects would be very slight to negligible.
42. In both assessments, the conclusions made reflect the well-established influence of large-scale industrial structures at the Kronospan site upon the surrounding area, including upon views to and from designated heritage assets. The new structures that would be introduced as part of the Proposed Development would not result in any change of note in this influence. Additional material and amendments to existing content are included in the final LVIA to further demonstrate this point as follows:
- Figure 1 wholly revised to include a ZTV of existing tall structures at the Kronospan site, and a ZTV of the Proposed Development.
 - Amendments to Appendix 2 to include a methodology for ZTV production.
 - Inclusion of an additional Viewpoint from the entrance to Chirk Castle (Figure 2q).
 - Inclusion of summer photography from Viewpoints I, J and K (Figures 2i, 2k and 2k).
 - Amendments to Appendix 5 to include an assessment of effects from the Chirk Castle Entrance Viewpoint.
 - Amendments to the main LVIA text to reflect all the above changes.
43. As such, the setting of designated heritage assets including the World Heritage Site and Chirk Castle would experience minimal change which would not affect the historic features protected by designation or the way these are experienced by the public. As such, the Proposed Development would not conflict with national, international or local planning policies intended to protect the historic environment.