

Wrexham County Borough Council
The Guildhall
16 Lord Street
Wrexham
LL11 1AY

Your Ref P/2022/0066

Our Ref CRTR-PLAN-2022-35100

Tuesday 8 February 2022

Dear Mr Greenland

Proposal: Extension of existing caravan site consisting of caravan pitches with tarmac road, glamping units, safari tents, car park, linen storage shed and paths linking to units.

Location: The Caravan Club, Lady Margaret's Park, , Chirk

Waterway: Llangollen Canal

Thank you for your consultation.

We are the charity who look after and bring to life 109 miles of canals in Wales. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of Wales. The Trust is known as Glandŵr Cymru, the Canal & River Trust in Wales and we are a statutory consultee in the Development Management process.

Based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended)) is that the Trust has **general advice and concerns** relating to the following issues:

- a) Structural integrity of Chirk Tunnel
- b) Surface water drainage
- c) World Heritage Status
- d) Ecology

Our advice and comments follow:

Structural integrity of Chirk Tunnel

The Llangollen Canal passes through Chirk Tunnel which is located to the east of the site. From our records the route of the tunnel passes under the northern part of the site, just outside of this application boundary. Chirk Tunnel was constructed in 1802 by William Jessop and is a one-way working tunnel with single towpath. The tunnel is lined in brickwork and constructed with masonry portal walls. The tunnel is grade II* listed. Based on the submitted layout plan it would appear that three of the caravan pitches appear to be close to the 'zone of influence' of the tunnel and we would not want to see these, or any other development moved further east. (Under normal circumstances an area of ground is said to be in the 'zone of influence' of a tunnel; this area is

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calculated by taking a 45 degree line from the tunnel invert and projecting this line to the surface. The area of influence is inside this 45 degree line where it reaches the surface). That said, caravans situated in this location would be preferable to cabins or built development. In any case care needs to be taken during construction of the roadways and the hard standing pitches to avoid excessive vibrations, any vibration compaction needs to be kept to a minimum. It is important that any built development in the vicinity of the tunnel (within the zone of influence) has regard to the presence of the tunnel and should not rely on the tunnel structure for support, as depending on the type of development proposed, loading forces could be transferred onto the tunnel lining and cause damage. It is therefore important that surface structures are supported independently of the tunnel.

Surface water drainage

The application form sets out that surface water drainage would be to the main sewer and that foul waste would be directed to the main sewer. The submitted drainage plan are not entirely clear in terms of how the surface water drainage arrangements for the site would connect. However, the Planning Statement sets out that surface water drainage will be incorporated adjacent to each pitch/plot and that surfacing materials will be permeable. Based on this, the surface water drainage would not impact the canal infrastructure and we would have no further comment to make on this matter.

World Heritage Status

The site lies within the buffer zone of the Pontcysyllte Aqueduct and Canal which is a designated Scheduled Ancient Monument (SAM). We note that this has been referenced within the accompanying application documents. Based on the submitted details it would appear that the site would be well screened by existing vegetation and will not be visible from the canal corridor. We also note the intention to provide further native planting/landscaping. Future users of the site would be able to visit the World Heritage Site, which would be largely beneficial.

Ecology

Based on the submitted details this appears to be a well-considered proposal with sufficient survey information and ecological enhancements included. The suggested enhancements within the ecological assessment should be fully incorporated and embedded within the development proposals to ensure they are secured.

For us to monitor effectively our role as a statutory consultee, please send me a copy of the decision notice.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Tim Bettany-Simmons MRTPI
Area Planner

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