



**Ymddiriedolaeth  
Genedlaethol  
National Trust**

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Head of Community Well-being and Development  
Wrexham County Borough Council  
Lord Street  
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**Dear Sir/Madam,**

**NATIONAL TRUST RESPONSE TO PLANNING APPLICATION P/2016/0534  
Proposed Building Extension to Store Medium Density Fibreboard (MDF) and  
Chipboard, Kronospan, Chirk.**

I refer to the above planning application, and provide the response of the National Trust to the submitted planning application. Thank you for the opportunity to respond. It is requested that the comments set out in this letter, in relation to the potential impacts on National Trust land, are taken account in the determination of the planning application.

**National Trust and land ownership**

National Trust is a leading conservation charity with 4 million members. Established over 115 years ago, our primary statutory purpose is to promote the preservation of special places for the benefit of the nation. To achieve this aim we manage over a quarter of a million hectares of land; more than 700 miles of unspoilt coastline and estuary; several hundred historic houses; gardens and parks, and 6 World Heritage Sites. More than 100 million visits are made every year to the properties in our care.

**National Trust and Chirk Castle**

Chirk Castle was transferred to the Trust's protective ownership in 1981, along with the surrounding gardens and park. The castle welcomes over 140,000 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.

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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.

Paragraph 6.5.25 of Planning Policy Wales advises “Local planning authorities should protect parks and gardens and their settings included in the first part of the ‘Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales’. Cadw should be consulted on planning applications affecting grade 1 and II\* sites and the Garden History Society should be consulted on all parks and gardens on the Register. Information on the historic landscapes in the second part of the Register should be taken into account by local planning authorities in considering the implications of developments which are of such a scale that they would have a more than local impact on an area on the Register (see para 6.4.9). The effect of proposed development on a park or garden contained in the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales, or on the setting of such a park or garden, may be a material consideration in the determination of a planning application.

### **Planning Application Submission**

The proposed development comprises an extension to an existing building to enable it to be used for the storage of MDF and fibreboard at Kronospan. The proposed building is 150m in length, 29m in width and 22.5m to eaves and 26.5m to ridge line.

National Trust considers that insufficient information has been submitted to demonstrate impact from the west, nor sufficient information to demonstrate impact from North West, New Hall Farm direction: the latter being the point of arrival for visitors to Chirk Castle and with important views across to Chirk village. The LVIA submission incorporates a viewpoint from Figure 1, but the quality of the photograph and representation is not sufficient to consider the implications of the proposed scheme.

National Trust considers that the submitted Landscape and Visual Impact Assessment and submitted Design and Access Statement does not give sufficient recognition of potential views from the west and north-west, nor assess the scheme against the Registered Park and garden nor identify this as a key constraint.

It is noted that the application site lies within the buffer zone of the Pontcysyllte Aqueduct & Canal World Heritage Site. The application site also relies on tree planting to mitigate impact on the WHS that is not in its ownership or control.

The application underestimates the economic benefit of adjoining land uses based on landscape and heritage quality including visitors to Chirk Castle and visitors to the adjoining AONB and World Heritage Site. These are important issues that need to be emphasised in the planning balance for any determination of the planning application.

There have been a number of recent proposals which involve incremental expansion of the Kronospan complex and the prospect of future developments at the site. National Trust remains concerned about cumulative effects of the current application and the need for further action to mitigate landscape impacts over the medium and longer term.

All recent planning applications rely on the established industrial development at Kronospan, and the current application follows the same trend and same conclusions within the submitted LVIA. The conclusions of the LVIA (para 6.3) does however confirm "screening by vegetation and other features is significant west of the site, with few clear views available. Where visible, the proposed development would always appear subordinate to the existing taller structures on site". This statement confirms the current application, and existing established industrial development at Kronospan is dependent upon visual screening by land outside the ownership of the applicants. Kronospan have also secured further land ownership to the west of the existing site, but have not considered this aspect within the current, or other recent planning applications for the site.

National Trust support the development of a long term landscape strategy to mitigate impacts on the wider landscape (notably the AONB, WHS and Chirk Castle) and request consideration of a landscape enhancement fund through a Section.106 agreement.

It is noted that planning consent P/2016/0219 was granted with planning condition 5 requiring the submission of a landscape strategy. This condition potentially only brings forward land within the blue line of the planning unit, and not extend to potentially more significant land eg mitigation of elevated views, mitigation from Offas Dyke, mitigation from Registered Park and Garden, which may lie outside the planning blue line. Hence it is suggested that a Section 106 Agreement requiring a funded landscape strategy for the scheme is a more appropriate way forward for the subject application. This way forward also gives the opportunity for wider agreement on landscape and visual impact on a range of designated features in proximity to the Kronospan development.

National Trust would also note that application P/2016/0336 is currently not determined with outstanding landscape and visual issues. National Trust considers that the issues arising from applications 2016/219, 336 and 534 could be addressed with a wider landscape strategy. This direction may also enable wider benefits to be brought forward from a period where less emphasis was given to landscape issues within an internationally recognised landscape canvas.

National Trust also wishes to raise again the issue of dust management and ensure that Kronospan is taking all practical measures to reduce dust management from its operations and ensure that the new enclosures and dust management procedures are fully operational.

I would be grateful for a copy of the decision letter in due course. Thank you for your time in considering our representation.

Yours sincerely

John Pearson Land Use Planning Advisor/Cynghorwr Cynllunio Defnydd Tir