



**Ymddiriedolaeth
Genedlaethol
National Trust**

John.pearson@nationaltrust.org.uk

Ffôn/Phone: 07770 496701

Date: 18/07/2016

Head of Community Well-being and Development
Wrexham County Borough Council
Lord Street
Wrexham
LL11 1LG

Dear Sir/Madam,

**NATIONAL TRUST RESPONSE TO PLANNING APPLICATION P/2016/0336
Extension To House A New Melamine Facing (Mf) Press, Following The Demolition /
Relocation Of The Existing Mf Department's Ventilation System, Hydraulic Oil And
Diesel Storage Tanks, A Vehicle Filling Station, Garage Service Building And Other
Associated Development, 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 120,000 visitors a year.

Ymddiriedolaeth Genedlaethol /
National Trust
Swyddfa Ymgynghoriaeth /
Consultancy Hub
Erddig
Wrexham
LL13 0YH
Ffôn / Tel: +44 (0) 1978 340 800
www.nationaltrust.org.uk

Llywydd / President: HRH The Prince of Wales
Cadeirydd Cymru / Wales Chairman: Keith James OBE
Cyfarwyddwr Cymru / Director for Wales: Justin Albert

Swyddfa gofrestredig / Registered office:
Heelis, Kemble Drive, Swindon, Wiltshire SN2 2NA
Rhif elusen gofrestredig / Registered charity number 205846



INVESTORS | BUDDSODDW
IN PEOPLE | MEWN POBL

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.

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 would have a significant visual impact on the surrounding area as a result of the scale and height of the proposed structures.

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 application 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 disappointing to note that the submitted Design and Access Statement also fails to recognise or consider the relationship between the site and the AONB.

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.

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 and the need for further action to mitigate

landscape impacts over the medium and longer term. 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 also wishes to raise 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