

Cerys Jones

From: Mark Walters <mark.walters@cpat.org.uk>
Sent: 09 December 2019 14:02
To: planning
Subject: [DKIM:INVALID] P/2019/0877 Outline for Industrial Units on land at Oak Road, Wrexham Industrial Estate - Holding Objection Pending Layout Change
Attachments: Location Plan - Suggested Addition to Heritage Zone.pdf

Dear Sir or Madam

Thank you for the consultation on this application.

The proposed industrial units lie on or adjacent to the remains of part of the former ROF Marchwiell WWII cordite production facility. The remains to the immediate east and south of the application area are currently being processed at Cadw for protection by scheduling as they are considered to be a unique survival and nationally important. Due to the proximity of the proposals to the pending scheduled area boundary Cadw will therefore need to be consulted as a separate planning consultation process via Neil Maylan at their Ancient Monuments Planning Admin section amadminplanning@gov.wales for their comments on this scheme.

We are broadly supportive of the heritage protection zone that has been identified in the scheme layout. However, we note the content of the updated Wessex Archaeology report and in particular the statement in 8.2.6 (page 27) that Gifford Sites 8 and 3 are considered to be **“buildings whose retention would potentially significantly enhance the setting and group value of the buildings within the proposed Heritage Zone”**. These buildings include Gifford No. 8 (the NG Process Water Storage Tower), which is a landmark structure located just to the west of the proposed Heritage Zone boundary; and Gifford No.3 (the NG Refrigeration and Air Compression Plants and associated M.N.T. pipeline elements. These are also located close to the western boundary of the proposed Heritage Zone, are easily accessible, and are closely associated and in line of sight with Gifford Building Nos. 6 and 7.

By direct association with the Nitro Glycerine buildings in the Heritage Zone Gifford buildings 8 and 3 are therefore of equal importance and whether scheduled or not they would be classed as of national importance. We would therefore recommend that Gifford buildings 8 and 3 should be preserved and included in the Heritage Zone and should not be demolished for replacement industrial buildings.

A layout change would therefore be required to prevent an objection to the current layout plans submitted with the application. A suggested addition to the Heritage Zone is indicated in green on the attached plan. Cadw have also been contacted about potential revision of their pending scheduled monument boundary to take Gifford buildings 3 and 8 into consideration. It would be appreciated if the applicant could confirm that the buildings within this excluded area can be added to the Heritage Zone.

If this is not possible then we would have to formally object to the application as the current layout will cause significant harm to structures which are considered by association, group value and rarity to be of national importance along with the NG buildings to the east and in accordance with TAN 24, 4.2 which states: *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.*

Kind regards

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