

Bryn Eglwys
Castle Road
Chirk
LL14 5BS
2 August 2019

The Planning Inspectorate
Crown Buildings
Cathays Park
Cardiff CF10 3NQ

Dear Mr Isted

Planning References:

P 2018 0551

Site Address:

KRONOSPAN LTD
HOLYHEAD ROAD
CHIRK
WREXHAM

Site Description:

PLANNING APPLICATION FOR THE DEVELOPMENT OF AN ORIENTATED
STRAND BOARD PRODUCTION FACILITY

Welsh Government Ref/Planning Inspectorate ref:

H6955/A/19/3227571

I wish to make further representations in connection with this appeal to The Planning Inspectorate.

I understand that my original comments as a consultee following the original application for permission have been forwarded to the Planning Inspectorate and copied to the appellant and will be taken into account by the Inspector in deciding the appeal. I confirm that these original comments are not confidential. These original comments have not been included within this additional representation but are still relevant to the planning application.

I also wish to receive a copy of the appeal decision letter from the Planning Inspectorate.

This additional representation includes the following comments:

There is no current LDP

The Wrexham County Borough Local Development Plan (LDP) 2006-2021 was formally withdrawn on 21st March 2012 following significant concerns during the initial Examination by the Planning Inspector. The Council have yet to submit a revised LDP for examination.

The LDP must contain a reasoned justification of the policies contained within it and by its withdrawal no evidence or justification has been provided by WCB for the significant local traffic increase, environmental impact, soundscape impacts from increased noise and pollution for the application to produce OSB by Kronospan. There are existing proposals for the new LDP to include additional housing directly opposite the Kronospan site on land owned by Kronospan. A planning application has been approved by WCB for a site within yards of the Kronospan fence (the so called Co-Op site), with no regard to future environmental impacts on the new residents.

Evidence of the environmental and pollution impact has been the recent £80,000 fine imposed by Wrexham Magistrates when samples taken at the Kronospan site in Chirk showed significant breaches of the company's consent to discharge trade effluent. Welsh Water officers also witnessed an unauthorised discharge into the public sewer during a site visit. Such corporate miss-behaviour was also recorded in 2002 when Kronospan were fined after taking too much water from a borehole beneath its site and for water pollution offences.

Planning Policy Wales (Edition 10, December 2018)

The proposal by Kronospan breaks the following planning policy defined within Edition 10:

1.30 Managing new development is led by the planning authority, working collaboratively with those proposing developments and other stakeholders including the local community. It must be undertaken in the spirit of partnership and inclusiveness (using the five ways of working) and supports the delivery of key priorities and outcomes (contributing to improving the social, economic, environmental and cultural well-being). The local community object to this development on environmental, traffic congestion, noise and pollution grounds. WCB and Kronospan have effectively "ignored" these objections contrary to the way of working and achievement of the seven well-being goals (ref 2.8); as required by the Well-being of Future Generations Act.

A placemaking approach to plan making, planning policy and decision making must be adopted. Good placemaking is therefore essential to the delivery of sustainable development and achieving improvements in the well-being of communities. Evidence of bad placemaking includes the significant increase on traffic volumes into the Kronospan site – where the WCB traffic authority has established that there will be one large articulated lorry every minute 24 hours a day every day of the year entering/leaving the site onto an urban "B-Road". Clearly this does not address well-

being and safety considerations. Inconsiderate parking of these lorries on the B-road outside of the local Co-Op store has also been provided as evidence to WCB planners.

There must be a planning placemaking decision to establish a new road link into Kronospan from the A5 Trunk road Whitehurst roundabout to support the existing volume of traffic into/off the site. This would be across land owned by Kronospan and must be included in the LDP or any approved application for development.

The Kronospan development for OSB does not represent “Sustainable Development” and does not improve the economic, social, environmental and cultural well-being of Wales in accordance with the sustainable development principle, aimed at achieving the well-being goals. Legislation secures a presumption in favour of sustainable development (ref 1.17) to ensure that social, economic, cultural and environmental issues are balanced and integrated.

National development Framework (ref. 1.22)

The NDF concentrates on development and land use issues of national significance, indicating areas of major opportunities and change, highlighting areas that need protecting and enhancing and helping to co-ordinate the delivery of Welsh Government policies to maximise positive outcomes.

The environment of Chirk requires protecting from over-development of industrial sites such as Kronospan's. There are significant local tourist and heritage sites. These include the World Heritage site (just outside Kronospan's fence), the canal into Llangollen, Chirk aqueduct and the National Trust at Chirk Castle. Significant visual and environment issues already influence these facilities. Large lorry and car traffic into the site for example already hampers vehicular movements. Increasing production by 50% from the site proposed by Kronospan will exacerbate these concerns. Additionally, the existence of a private prosecution of Kronospan by local citizens concerned by the environmental impact already happening indicates that a “Healthier Wales” is not being achieved. The threat of Nitrox Oxide and dioxin levels from the plant on the infant school outside the main gate to the site cannot be over-emphasized.

Transportation infrastructure (ref 5.3)

The provision of sustainable transport infrastructure is essential in order to build prosperity, tackle climate change, reduce airborne pollution and to improve the social, economic, environmental and cultural well-being. The Kronospan development will not reduce airborne pollution and will have a significant environmental impact on the Town. Care has not been undertaken to minimise the adverse impacts on the transport infrastructure, the natural, historic and built environment and on the local community, including public health resulting from airborne pollution.

Tourism (ref 5.5)

Tourism-related development is an essential element in providing for a healthy and diverse economy. Here development should be sympathetic in nature and scale to

the local environment. The doubling of Kronospan production facilities does not scale to the local environment. The development proposed does not assist in enhancing the sense of place of Chirk which has intrinsic value and interest for tourism.

Sustainable Drainage Systems (SuDS) (ref 6.6)

The Kronospan development is greater than 100 metres square in size. The provision of SuDS must be considered as an integral part of the design of new development and considered at the earliest possible stage when formulating proposals for new development. Kronospan have not undertaken this work. At the very least Kronospan must ensure the incorporation of measures at the individual scale of the site.

Surface and subsurface hazards give rise to both actual and perceived risks. A key principle is that surface and sub-surface risks are understood and can be effectively understood by Kronospan to inform investment decisions, and the public who have concerns regarding contamination and other physical and chemical constraints affecting the site and Chirk.

Taking early action by refusing the development plan by Kronospan, based on the precautionary principle for surface and subsurface hazards, not only reduces costs but ameliorates the potential for long term risk to the local and national community and future generations.

Air quality and soundscape (ref 6.7)

Clean air and an appropriate soundscape, contribute to a positive experience of place as well as being necessary for public health, amenity and well-being. These are indicators of local environmental quality and integral qualities of place which must be protected from over-development at Kronospan. The increased air and noise pollution from Kronospan will have a negative effect on people, biodiversity and the resilience of the local ecosystem and thus this development must not be approved.

I understand that the Chirk Town Council share these concerns.

Finally, please note that my submission is in respect of the proposed development at Kronospan. While I have taken every effort to present accurate information for your consideration, I am not a decision maker or statutory consultee, and cannot accept any responsibility for unintentional errors or omissions. The Planning Inspector should satisfy themselves on any facts before reaching a decision.

Yours sincerely,

Andrew R Burgess