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Eich cyfeirnod Your reference	P/2017 /0738
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Dyddiad Date	13 October 2017
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Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

**WORKS TO TREES INCLUDING REMOVAL, MAINTENANCE AND REPLACEMENT
PLANTING (TREES PROTECTED BY TREE PRESERVATION ORDER NO WCBC NO
33) BRYNKINALT PARK, TREVOR ROAD CHIRK WREXHAM**

Thank you for your letter of 12 September 2017 inviting our comments on the above mentioned proposal.

We have carefully considered the information provided with this application to carry out works to protected tree(s) as mentioned above and our assessment of the application is given below.

Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

National Policy

Applications for planning permission are considered in light of the Welsh Government's

Mae'r Gwasanaeth Amgylchedd Hanesyddol Llywodraeth Cymru (Cadw) yn hyrwyddo gwaith cadwraeth ar gyfer amgylchedd hanesyddol Cymru a gwerthfawrogiad ohono.

The Welsh Government Historic Environment Service (Cadw) promotes the conservation and appreciation of Wales's historic environment.

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.
We welcome correspondence in both English and Welsh.



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land use planning policy and guidance contained in Planning Policy Wales (PPW), Technical Advice Notes and circular guidance.

PPW (Chapter 6 – The Historic Environment) explains local 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, and that the effect of a proposed development on a registered park or garden or its setting should be a material consideration in the determination of a planning application.

Assessment

This application is for proposed works to trees and new planting within the grade II* registered historic park and garden at Brynkinallt. The application is accompanied by a tree survey and proposed planting plan by Sylvan Resources Ltd.

In our view, this application lacks reference to historic sources to inform the proposals. We consider that in general, mature and veteran trees of historic significance to the registered historic park and garden should be retained wherever possible. New planting should be sympathetic to the historic park in terms of layout and species and opportunities should be sought to enhance or reinstate lost planted features; the first edition Ordnance Survey map and other archive records for the estate can help to inform planting proposals.

Turning now to the proposed tree surgery to veteran trees, we consider that it is highly important to retain the veteran oak trees located in the registered historic park and garden. The veteran oaks are an important historic feature of the registered park and garden at Brynkinallt and have high biodiversity value. A balance should be struck between clearing deadwood to enhance the visual quality of the registered park, with retaining some deadwood (standing or on the ground) for parkland biodiversity.

We consider that the proposed replacement of the clump of horse chestnut trees (area A) with a *cedrus libanii* clump will introduce a new and appropriate feature into the registered park, visible across the parkland and from the west drive. Further removal of young trees is proposed adjacent to the west drive to accommodate the new planting of the lime avenue. Although the west drive does not historically appear to have been lined with an avenue, we consider this to be an appropriate feature to introduce to the registered park. Further sympathetic planting proposals include *quercus robur*, *quercus ilex* and *cedrus libanii* to perpetuate the parkland planting.

However, we are concerned about the proposed planting of *taxus baccata* (yew) in the open parkland at Brynkinallt, as we do not consider this to be in keeping with the character of the registered park and would therefore recommend that a species more in keeping with the character of the registered parkland should be considered.

In addition, a further new planted feature avenue of *Carpinus betulus* ‘fastigiata’ (fastigiated hornbeam) is proposed between the hall gardens and the kitchen garden to define the historic path in this location. Whilst this route is depicted on the first edition Ordnance Survey map (published 1879) crossing open parkland, and the continued use of this historic route is welcome, we would again suggest that a species more in keeping with the character of the registered parkland should be considered.

Yours faithfully

Nick Segust
Diogelu a Pholisi/ Protection and Policy

