

**APPENDIX G**

**COPY OF ALL RESPONSES RECEIVED FROM SPECIALIST CONSULTEES**

Bobby Clayton  
Axis

Sent by email

Eich cyfeirnod  
Your reference

3046-01/BC

Ein cyfeirnod  
Our reference

Dyddiad  
Date

10 November 2022

Llinell uniongyrchol  
Direct line

0300 025 6007

Ebost  
Email:

[Cadwplanning@gov.wales](mailto:Cadwplanning@gov.wales)

Dear Sir / Madam,

**Statutory Pre-App - North access road, lorry park and works, Land adjacent Kronospan Ltd, Holyhead Rd, Chirk, LL14 5NT**

Thank you for your letter inviting our comments on the information submitted for the above pre-planning application.

Advice

We consider that the application is inadequately documented and we recommend that additional information is required to enable a balanced decision to be taken against Planning Policy Wales, Technical Advice Note 24 Historic Environment and associated guidance. Full details of the additional information that is required are explained in the below assessment.

The national policy and Cadw's role in planning are set out in Annex A.

Assessment

Scheduled Monuments

DE117 Castell y Waun Castle Mound  
DE133 Offa's Dyke: Caeau-Gwynion Section  
DE134 Offa's Dyke: Chirk Castle Section extending NE from Castle Mill  
DE135 Offa's Dyke: Chirk Park Section extending NE from the Lake  
DE138 Offa's Dyke: Section N & S of Plas-Offa  
DE140 Offa's Dyke: Section N & S of Tan-y-Cut  
DE175 Pontcysyllte Aqueduct and Canal  
DE198 Offa's Dyke: Chirk Park Section extending 340m NE of Home Farm  
DE223 Darland Wood Round Barrows  
DE288 The Holyhead Road: the Chirk Embankment and earlier trackways

Registered Parks and Gardens:

PGW(C)11(WRE) Whitehurst  
PGW(C)15(WRE) Brynkinalt  
PGW(C)42(WRE) Argoed Hall  
PGW(C)63(WRE) Chirk Castle  
PGW(C)64(WRE) Wynnstay



World Heritage Sites:

## Pontcysyllte Aqueduct and Canal

Cadw have significant concerns in regard to the impact of the proposed development on nationally and internationally important historic assets. These impacts have not been fully considered in the Environmental Statement submitted with this consultation. In particular, the following issues have been identified: -

The proposed development represents a large extension of the Kronospan site onto open countryside in the identified buffer zone of the World Heritage Site. In particular, the size of the proposed lorry park is considerably larger than the existing parking areas, which causes considerable concern that the development will have an adverse impact on the outstanding universal value of the World Heritage Site. Whilst chapter 3 of the environmental statement discusses alternative sites in the immediate area of the Kronospan site and its environs, there is no consideration of establishing a lorry park outside the buffer zone of the World Heritage Site to hold lorries until they are required to be unloaded. The current system requires lorries to arrive at the plant in pre-arranged times, this has led to lorries using parking facilities on the trunk road network to await their allocated time, resulting in some congestion in those area. A lorry park outside the buffer zone would therefore alleviate this issue and allow storage of trailers and potentially, in the long-term, allow a maintenance facility to be developed, without an adverse impact on the outstanding universal values of the World Heritage Site. Chapter 3 should therefore consider the potential of developing some of the proposed development on a site outside the World Heritage Site buffer zone.

It is noted in section 3.5.6 of the Planning Statement that the existing HGV parking will be repurposed in the future for improved staff, visitor and contractor car parking. As such, there is a need for an explanation why an additional carpark is required as part of the proposed development.

The archaeological evaluation has located a limekiln, which, section 7.1.12 of the resulting report suggests, appears to have been dismantled. A date for this limekiln was not established during the evaluation, although it is probably early 19<sup>th</sup> century or earlier, especially as it is not recorded on the historic maps, so far, consulted by the archaeologists. If the limekiln has been dismantled it implies that it was not required any more, which rises the strong implication that its construction and use relates to a major building project, rather than for agricultural purposes. The major construction project carried out in close proximity to the limekiln, in the period it would have been use, is the Pontcysyllte Canal. There is therefore a strong likelihood that the limekiln was used in the construction of the Canal. This association would considerably raise the significance of the limekiln to National level. Consequently, there is a clear need for further research on this limekiln to be carried out, particularly consulting the construction records for the canal, so that the significance of the limekiln can be determined.

The impact of the lighting required for the proposed development has not been considered in chapter 6 of the environmental statement. In particular, no consideration has been given to the impact of lighting on Chirk Castle and its registered historic park and garden or the World Heritage Site and its buffer, (parts of





which are at a much higher level than the application area) within the lighting assessment which is included as Appendix D of the planning statement prepared for the application.

A heritage impact assessment has been produced considering the impact of the proposed development on the World Heritage Site: However, this work does not follow the guidance given in the UNESCO document Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022). There is therefore a need for a new heritage impact assessment to be prepared following this guidance. Once this assessment and the others identified above have been completed than Chapter 6 of the Environmental Statement will need to be revised to incorporate their results. This revision may lead to a requirement that the design of the proposed development will need to be altered and additional mitigation measures may also need to be included.

Yours sincerely,

Nichola Davies  
Casework Manager



## Annex A

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

PPW [planning-policy-wales-edition-11.pdf](#) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)

[Technical Advice Note 24: The Historic Environment](#) elaborates by explaining that 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.

### Historic Parks and Gardens

PPW also explains that local authorities should value, protect, conserve and enhance the special interests of parks and gardens and their settings included on the register of historic parks and gardens 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.

Bobby Clayton  
Axis PED Ltd  
Well House Barns,  
Chester Road,  
Bretton,  
Flintshire,  
CH4 0DH

ebost/email:  
northplanning@cyfoethnaturiolcymru.gov.uk  
Ffôn/Phone: 03000 65 3497

18/11/2022

Dear Mr Clayton,

**STATUTORY PRE-APPLICATION CONSULTATION - TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED.**

**BWRIAD / PROPOSAL: Construct a north access road, lorry park, roundwood storage areas and associated structures, 132kV substation and ancillary works**

**LLEOLIAD / LOCATION: Land immediately adjacent Kronospan Ltd, Holyhead Rd, Chirk, LL14 5NT**

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 14<sup>th</sup> October 2022.

**We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding flood risk, protected sites, foul drainage, groundwater protection and land contamination, landscape and protected species. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.**

**Flood Risk**

The planning application proposes less vulnerable development of an electrical substation, lorry park and timber storage. Our Flood Risk Map confirms the site to be partially within Zone C2 of the Development Advice Map (DAM) contained in TAN15 and the FMfP identifies the application site to be at risk of flooding and falls partially into Flood Zone 2 & 3 (Rivers).

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, we refer you to the tests set out in section 6.2 of TAN15. If you consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for the applicant to demonstrate through the submission of an FCA that the potential consequences of flooding can be managed to an acceptable level.

We have reviewed the FCA undertaken by SLR, dated May 2022, reference 416.05415.00009. Our advice to you is that the FCA fails to demonstrate that the risks and consequences of flooding can be managed to an acceptable level for the reasons explained below.

Section 8 of the FCA states that 'given the minimal area and that any variation to flood extent would be an increase to the applicant's own development land on the opposite side of the river it is not considered necessary to provide purpose built flood compensation storage.'

However, we note that Afon Bradley Farm lies in close proximity to the proposed development and the Afon Bradley therefore we advise that further information should be provided to assess potential impacts on flood risk beyond the development site. Further hydraulic assessment should quantify the potential loss of flood storage and impact on flood flows which could cause impact to 3<sup>rd</sup> party property and assets, including the access road.

The loss of flood storage will need to be quantified and any potential impacts on flood flow routes resulting from the development should be assessed. Any loss of flood storage resulting from the development should be compensated for, calculated on level for level basis for various return periods and this may require detailed modelling depending on the quantification of losses.

Blockage scenarios and culvert capacity under the access road to Afon Bradley Farm and also the B5070 downstream should also be considered within the FCA.

In summary, the FCA needs support of hydraulic modelling and quantification of flood storage losses and compensation to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development.

If no further information is submitted, or a revised FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we would object to this application when formally consulted by the Local Planning Authority.

## **Protected Sites**

### River Dee and Bala Lake Special Area of Conservation (SAC)

We have concerns that a significant effect from the proposed development on the River Dee and Bala Lake SAC cannot be ruled out. The application is located approximately 1.4km upstream of the SAC.

Further information should be provided to the Local Planning Authority to inform a Habitat Regulation Assessment (HRA) under regulation 63 of the Conservation of Habitats and Species Regulations 2017 prior to the determination of the planning application. The HRA should demonstrate that there will be no adverse effect on site integrity.

#### - Pollution Prevention

Further details regarding the surface water drainage treatment should be submitted as outlined below, specifically information relating to interceptors and separators to remove silts and chemicals prior to discharge into the Afon Bradley which subsequently enters the River Dee SAC. Guidance on interceptors is available via [guidance-for-pollution-prevention-3-2022-update-v2.pdf \(netregs.org.uk\)](https://www.netregs.org.uk/guidance-for-pollution-prevention-3-2022-update-v2.pdf)

The two proposed round wood storage areas are to be formed using permeable ground cover and not formally drained - a move that appears at odds with increased use of hard standing on site. The submitted information also states that substation platform would be constructed, where possible from permeable materials. The substation will contain hazardous substances to provide electrical insulation and cooling, therefore further information should be provided to the LPA to demonstrate that adequate safeguards would be in place to prevent loss of containment of hazardous substances to ground in the event of a substation incident. Justification would also need to be provided for not storing round wood on hardstanding in order to minimise the impact on soil and groundwater,

The proposed lorry park and car park areas would be constructed as a permeable sub-base and paving on a geo-cellular and geomembrane to provide a drainage layer that would drain surface water to the two northern attenuation basins. This surface water would then be discharged at a controlled rate into the Afon Bradley. It is stated that an oil interceptor would be installed as a precautionary measure prior to the point where the drainage would discharge into the proposed attenuation basins. Further information would be needed to demonstrate that adequate safeguards would be in place to minimise the loss of hydrocarbons etc., to the drainage layer and that provisions would be put in place for the priority off-loading of tankers of hazardous substances to avoid parking up (this applies to any loads of hazardous substances). Consideration also needs to be given to what remedial action would be carried out in the event of a loss of containment and proposed mitigation should be detailed in a full planning application. A soil / groundwater assessment 'baseline report' would also be needed within a full planning application to enable any degradation over time to be detected.

#### - Foul Drainage

We note the proposed application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21<sup>st</sup> January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. In line with our [Planning Advice](#) (July 2022), under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments. We therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

We note from the information submitted that the development has the potential to increase the amount of phosphorus being discharged from the site. As such, we refer you to our Planning Advice and advise that you provide further information in support of any future planning application to be made. We note that no information has been submitted in respect of foul drainage arrangements for the proposed development. We advise you to seek further information as identified in the section titled 'What does this mean for development proposals involving connection to public wastewater treatment works' or 'What does this mean for development proposals involving private sewage treatment systems' of that advice.

The suitability of foul drainage arrangements for the proposed development is a matter for the LPA to determine. We therefore advise that as part of any future planning application submission, you provide the LPA with sufficient details of the proposed method of foul drainage to inform their Habitats Regulations Assessment (HRA) or to confirm whether or not any additional wastewater would be discharged from the site. If additional wastewater is to be discharged, it is likely the LPA will require further information from you to inform their HRA.

#### River Dee Site of Special Scientific Interest (SSSI)

We consider the proposals have the potential to impact upon the River Dee SSSI. Providing the impact pathways referenced above for the SAC are adequately addressed, we consider the features of the SSSI will also be adequately safeguarded

#### Chirk Castle and Parkland & Nant Y Belan and Prynella Woods Sites of Special Scientific Interest (SSSI)

We have considered the Environmental Statement, reference: 3046-01, October 2022, axis, submitted in support of the above application. We note that the report has not identified the grassland fungi (waxcaps) special feature of Chirk Castle and Parkland SSSI, and thus any assessment made may not have taken this feature into account. However, as the development boundary is over 960m from the Chirk Castle and Parkland SSSI we have no concerns over direct impacts on this feature of the SSSI.

Based on the information submitted, we consider that the proposed development is not likely to damage the features for which Chirk Castle and Parkland SSSI & Nant Y Belan and Prynella Woods SSSI are of special interest.

Modifications to the scheme as currently proposed may affect our view, and may merit a further consultation with us.

#### **Groundwater protection and land contamination**

We have concerns regarding the proposed permeable drainage for the substation area as described within Section 4.2.10 of the Environmental Statement (Chapter 4), reference: 3046-01, October 2022, axis and the potential for hazardous substances at the substation to enter the ground through infiltration. As referenced in our protected sites section above,

further information on adequate justification and safeguards would need to be demonstrated in any future planning application submitted to the Local Planning Authority.

The design and maintenance of storage and transmission facilities, such as tanks, lagoons and pipework, must be in such a way that hazardous substances are prevented from being released to the environment and the input of non-hazardous pollutants to groundwater is limited so as to not cause pollution. Natural Resources Wales expects operators to adopt appropriate engineering standards, taking into account the nature and volume of materials stored and the sensitivity of the groundwater. Where Natural Resources Wales judges there to be an unacceptable risk to groundwater from the storage of pollutants or their transmission through associated pipework or infiltration drainage, it will normally oppose such storage or transmission. If other material planning considerations determine that the development should proceed, Natural Resources Wales expects best available techniques (BAT) to be applied. Where storage already exists Natural Resources Wales will work with operators to assess and if necessary mitigate the risks to groundwater, with an aim to meet the objective set by this position statement. Re-use of existing facilities for new applications must be accompanied by a thorough assessment to demonstrate that the facilities are adequately designed and fit for purpose for the proposed new use, and that there will be no unacceptable input of pollutants to groundwater.

Any design should bear section D of The Environment Agency's approach to groundwater protection February 2018 Version 1.2 [The Environment Agency's approach to groundwater protection \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/682222/Environment_Agency_approach_to_groundwater_protection.pdf)

## **Landscape**

Our comments relate to the potential effects of the proposed development upon the public's experience of the landscape character and tranquility of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB).

The proposal is for a new link road, 132kV substation, lorry park and roundwood storage areas in farmland located to the north of the existing Kronospan site. The site lies in the small valley below and to the east of the AONB. Chirk Castle Parkland and a section of Offa's Dyke national trail lies within the AONB here. Views from these publicly accessible locations extend over the valley. Views are rural with a strong pattern of trees. In places, housing development in Chirk is evident. The roofs of large shed like buildings, stacks and vapour plumes of Kronospan influence some views and their areas within the AONB that are unaffected by modern development.

An important objective for the AONB (PPW11) is to conserve and enhance the public's experience of Natural Beauty and the area's special qualities. The AONB management Plan 2020- 2025 lists the landscape special qualities as: tranquillity, remoteness and wildness, space and freedom. Tranquillity is associated with an atmosphere of calm and stillness. Space and freedom are related to access to the landscape and the uninterrupted and extensive views from the high places within it.

The AONB management plan Special Qualities are referred to in section 5.4.18 of chapter 5.0 – landscape and visual effects. The report however does not provide a summary of development effects upon tranquillity.

From our review of axis LVIA Chapter 5, viewpoint images and photomontage images, it is clear that viewpoints U and W within Chirk Parkland have a strong historic parkland character, high scenic quality and high tranquillity. Kronospan has no visual influence on these locations within the AONB.

Photomontages U and W indicate that framed views to part of the proposed development would be possible. The area of the site visible includes the proposed 132kV substation and access road used by lorries. The size of the lorry park suggests vehicle movements would be high introducing activity and movement to views between gaps in parkland trees. Whilst activity is distant and occupies only a small segment of the landscape views, movement has the potential to attract attention. Attention would be drawn to commercial/industrial activity which we consider would be at odds with the tranquil quality of the parkland. This does not conserve and enhance the AONB.

An indicative landscape scheme has been submitted. This proposes robust areas of woodland planting, specimen trees and hedgerows along the edges of the site and looks to address local landscape integration well. This however won't conceal the development within views U and W from the AONB.

We therefore have concerns with current proposals. Additional landscape mitigation measures should be developed in order to minimise adverse views from the AONB. We advise that you consider discussions with the owners of Chirk Castle Parkland with regard to offsite planting in order to explore closing up views of the proposed development from viewpoints U and W. The sequential views of people approaching and passing viewpoints U and W along permissive paths will need to be factored into the mitigation design.

The report confirms at 5.6.66 that lighting of the proposed development would accord with ILP criteria for Environmental Zone E0, i.e. for 'dark sky' areas. We therefore have no issues with nighttime lighting effects upon the AONB's dark skies and nighttime character. Detailed proposals would need to be submitted in due course to demonstrate accordance with this statement.

## **Protected Species**

### Great Crested Newts

We consider that there is insufficient information submitted with this statutory pre-application consultation to determine the likely impacts of the proposals on Great Crested Newt. We advise that further surveys are undertaken as detailed below.

We note Appendix 7.3 'Great Crested Newt Presence or Absence (eDNA) Survey Report', details four lagoons (P1-P4), located within 250m of the Proposed Development, were subject to eDNA survey. However, it is also noted that 'Waterbodies in the wider area were not accessed at the time of the Great Crested Newt surveys'. The Environmental Statement

would therefore benefit from clarity as to the number of other waterbodies in the area and their proximity to the development site. Should additional waterbodies be present within 500m of the development site, we would advise that these are also subject to survey for Great Crested Newt (GCN), prior to submission of the formal planning application.

Together with the additional survey information indicated above, should GCN be confirmed, species report submissions should include a detailed assessment of the likely impacts of the proposals and full details of avoidance and/or mitigation measures that will be put in place to offset the anticipated impacts. There should be clarity on their scale, location and nature of mitigation areas and set out how these areas will be secured and managed in the long term, including any financial arrangements to ensure delivery of their management.

The above information is required prior to the determination of any planning application in order to ensure that there will be no detriment to the maintenance of the favourable conservation status of Great Crested Newt.

### Bats

We note that the report Environmental Statement, reference: 3046-01, October 2022, axis, has been submitted in support of the above application.

The development site is located within 960m of the Chirk Castle and Parkland SSSI, Lesser Horseshoe Bats are a feature of the protected site.

We advise that the proposed development is not likely to harm or disturb the bats or their breeding sites and resting places, the potential impact pathway from proposed lighting is adequately addressed through the Environmental Statement.

### **Air Quality**

We note the Air Quality Assessment, September 2022, Smith Grant Environmental Consultancy LLP, submitted in support of the proposed development and have no concerns to raise in relation to potential impacts on air quality.

### **Other Matters**

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

### **Advice for Applicant/Developer:**

- Permitting

The Operator needs to satisfy the requirements of The Environmental Permitting (England and Wales) Regulations 2016 (as amended) and the Best Available Techniques (BAT) Reference Document for Wood-based Panels Production and submit an application to vary the newly consolidated Natural Resources Wales environmental permit to update of any changes that may have consequences for the environment e.g. change to the installation boundary, 132 KV substation, round wood storage, site drainage and discharge to surface water and amenity impacts etc.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

**Rachael Burke**

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning  
Cyfoeth Naturiol Cymru / Natural Resources Wales

## Bobby Clayton

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**From:** AP Planning HD <APPlanning@hdcymru.co.uk>  
**Sent:** 21 October 2022 10:20  
**To:** Consultations  
**Subject:** hd ref P-221019-38031 / 3046-01/BC Land immediately adjacent Kronospan Ltd Chirk LL14 5NT

ST Classification: UNMARKED

Good day,

We wouldn't be able to offer any advice on a pre planning application; this is dealt with by Hafren Dyfrdwy as a Development Enquiry (this is an application the Developer/Applicant must submit). The forms can be obtained from our website, or from the Developer Services team 0800 707 6600.

If you would like a copy of this in Welsh, please let us know.

Kind regards,

Rhiannon

Asset Protection (West)  
Severn Trent Water - Waste Water Services  
email: [APPlanning@hdcymru.co.uk](mailto:APPlanning@hdcymru.co.uk)

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**From:** Roberts, Janis <Janis.Roberts@severntrent.co.uk>  
**Sent:** 17 October 2022 12:06  
**To:** AssetProtection HD <AssetProtection@hdcymru.co.uk>  
**Subject:** Mail into HD

ST Classification: UNMARKED

Please find attached correspondence that arrived in today's mail into HD

Kind regards

**Janis Roberts**  
**Service Delivery Assistant Hafren Dyfrdwy | Property Services**

 Email: [janis.roberts@hdcymru.co.uk](mailto:janis.roberts@hdcymru.co.uk)

 Severn Trent Water, Packsaddle, Wrexham Road, Rhostyllen. LL14 4EH



Severn Trent Plc (registered number 2366619) and Severn Trent Water Limited (registered number 2366686) (together the "Companies") are both limited companies registered in England & Wales with their registered office at Severn Trent Centre, 2 St John's Street, Coventry, CV1 2LZ This email (which includes any files attached to it) is not contractually binding on its own, is intended solely for the named recipient and may contain CONFIDENTIAL, legally privileged or trade secret information protected by law. If you have received this message in error please delete it and notify us immediately by telephoning +44 2477715000. If you are not the intended recipient you must not use, disclose, distribute, reproduce, retransmit, retain or rely on any information contained in this email. Please note the Companies reserve the right to monitor email communications in accordance with applicable law and regulations. To the extent permitted by law, neither the Companies or any of their subsidiaries, nor any employee, director or officer thereof, accepts any liability whatsoever in relation to this email including liability arising from any external breach of security or confidentiality or for virus infection or for statements made by the sender as these are not necessarily made on behalf of the Companies. Reduce waste! Please consider the environment before printing this email

## Bobby Clayton

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**From:** LUP enquiries <LUPenquiries@hse.gov.uk>  
**Sent:** 17 October 2022 15:44  
**To:** Bobby Clayton  
**Subject:** Consultation before applying for planning permission - Kronospan North Access Road

Dear Mr Clayton,

Thank you for your letter of 14 October 2022 to the Land Use Planning advice team of the Health and Safety Executive (HSE), requesting comments on your pre-planning application for the construction of an access road, lorry park, roundwood storage areas and associated structures, substation and ancillary works at Kronospan, Chirk.

1.HSE is a statutory consultee for certain developments within the Consultation Zones of major hazard sites and major accident hazard pipelines.

These types of development include:

- more than 500m<sup>2</sup> of office floor space;
- more than 750m<sup>2</sup> of floor space to be used for an industrial process;
- or developments which are otherwise likely to result in a material increase in the number of persons working within or visiting the notified area.

HSE's role is to provide local planning authorities with advice on the risks to people at a proposed development from a major accident at a site in the vicinity storing or using hazardous chemicals.

From the information provided, the proposed development will be within the consultation zones of:

- the Kronospan site which has consent to store hazardous substances in controlled quantities, and
- the Chirk Branch (HN047) Part 2 major hazard gas pipeline operated by Wales and West Utilities

HSE has developed a Web App (<https://pa.hsl.gov.uk/>) to enable local planning authorities and developers to find out whether HSE's advice is "Advises Against" or "Doesn't Advise Against" a proposed development.

Therefore HSE asks Axisped to consult on this application by using Phase 1 and Phase 2 of the Planning Advice Web App provided at <https://pa.hsl.gov.uk/> .

The Web App asks local authority users to input the area of proposed development, and then provide information on different uses within the proposed development. The Web App may ask the following questions:

- Does the development include a workplace specifically for people with disabilities, e.g. sheltered workshops?
- Are there 100 or more occupants in any individual workplace building?
- Are there 3 or more occupied storeys in any workplace building?

Further information on the use of the Web App can be obtained from the guidance at <https://www.hse.gov.uk/landuseplanning/user-guides.htm> or via this email address ([lupenquiries@hse.gov.uk](mailto:lupenquiries@hse.gov.uk)) .

2.As the proposed development is in the vicinity of a major accident hazard pipeline, you should consider contacting the pipeline operator before deciding the case. There are two particular reasons for this:

- The operator may have a legal interest (easement, wayleave, etc.) in the vicinity of the pipeline. This may restrict certain developments within a certain proximity of the pipeline.
- The standards to which the pipeline is designed and operated may restrict occupied buildings or major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline, or its operation, if the development proceeds.

We hope that this takes your pre-application forward.

Kind regards

Richard Lomax

Land Use Planning Advice team

Chemicals Explosives Microbiological Hazards Division 5B



Redgrave Court, Merton Road, Bootle, Merseyside, L20 7HS

Please send enquiries on Land Use Planning to [lupenquiries@hse.gov.uk](mailto:lupenquiries@hse.gov.uk)

HSE's Land Use Planning web app is at <https://pa.hsl.gov.uk/>

Please note that aspects of this service may incur a fee for business users.

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**From:** Bobby Clayton <[bobbyclayton@axisped.co.uk](mailto:bobbyclayton@axisped.co.uk)>

**Sent:** 14 October 2022 16:11

**To:** LUP enquiries <[LUPenquiries@hse.gov.uk](mailto:LUPenquiries@hse.gov.uk)>

**Subject:** Consultation before applying for planning permission - Kronospan North Access Road

Good afternoon

This email (and the attached letter and notice) is notification in accordance with Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (hereafter referred to as the 'DMPO') and The Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020 (hereafter referred to as the '2020 Order').

The attached is to consult you in respect of a proposed application to be submitted by Kronospan Ltd. ('the applicant') to Wrexham County Borough Council ('the Local Authority') for the construction of a north access road, lorry park, roundwood storage areas and associated structures, 132kV substation and ancillary works on land immediately adjacent Kronospan Ltd, Chirk, LL14 5NT.

Article 2 of the DMPO requires that applicants of major development proposals publicise proposed applications and consult any 'specialist consultees' in accordance with the provisions of the DMPO. HSE is a 'specialist consultee' listed within Schedule 4 of the DMPO, and as such I am required to consult you in writing and provide you with the documents comprising the draft application. A hard copy of the documents is provided and they are also available to view at <https://www.axisped.co.uk/consultations/>.

Please could I ask that you provide any comments on the draft application documents in writing for my attention at the address given below (Chester Office), or to [consultations@axisped.co.uk](mailto:consultations@axisped.co.uk), to be received no later than the 11<sup>th</sup> November 2022 (which is 28 days from the date of this letter).

Regards,

**Bobby Clayton**  
Associate



[bobbyclayton@axisped.co.uk](mailto:bobbyclayton@axisped.co.uk)

T: 0844 8700 007\* | M: 07951936030

Bretton, Chester, CH4 0DH

[www.axisped.co.uk](http://www.axisped.co.uk)

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**Response submitted by National Trust Cymru to Wrexham County Borough Council. Part 1A of the Town & Country Planning (Development Management Procedure) (Wales) Order 2016.**

**Proposal: NORTH ACCESS ROAD INTO THE KRONOSPAN FACILITY, LORRY PARK, ROUNDWOOD STORAGE AREAS AND ASSOCIATED STRUCTURES, 132KV SUBSTATION, AND ANCILLARY WORKS.**

**Location: Kronospan, Chirk.**

### **Introduction**

Thank you for the opportunity to respond to the pre application consultation.

The National Trust is a charity founded in 1895 by three people who saw the importance of our nation's heritage and open spaces and wanted to preserve them for everyone to enjoy. More than 125 years later, these values are still at the heart of everything we do.

Chirk Castle was transferred to the Trust's protective ownership in 1981, along with the surrounding gardens and park. The castle welcomes over 170,000 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.

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.

Our spirit of place statement recognises the importance of landscape and views, including our position overlooking the Dee and Ceiriog valleys and views out to 7 counties.

NT is proud of World Heritage Status achieved by Wrexham in 2009 for the Pontcysyllte Aqueduct and Canal. We note UNESCO's importance placed on the unified approach to the preservation of the buffer zone and the drafting of a plan for tourism development in the area. NT is a significant economic beneficiary of the tourism boost to the local economy by World Heritage Site visitors and we hope our contribution is complementary to putting Wrexham and Chirk on the international heritage map.

## **Response to Pre application consultation.**

National Trust is still considering the detailed documents and will look to respond to the application on submission.

We remain concerned about the submitted application, its location, the nature of the proposal and its proximity to a diverse range of nationally and internationally recognised landscape and heritage assets.

We would have the following observations at this stage:

- request a full and proper heritage impact assessment using 2022 World Heritage Site methodology.

- are concerned about the implications of the proposed scheme on the status of World Heritage Site for Chirk, particularly in relation to the sense of arrival and WHS buffer zone. We welcome sight of interested parties' responses to the consultation in relation to WHS status.

- request further consideration of Chirk castle in relation to the lighting assessment.

- would request further detail on the justification for the scheme based on a Vision 2025 ambition, and the lack of detail on what constitutes a Chirk Kronospan 2025 Vision. NT contributed to the previous Vision 2020 which includes none of the development proposed within the current pre application, and no similar process has been undertaken for Vision 2025. A simple Google search on Kronospan 2025 Vision has no detail on proposals for Chirk and includes schemes such as "Kaindl GmbH to build large biomass cogeneration by 2025". 8.1.2 of the Planning Statement summarises need based on a 2025 Vision without any detail. We would welcome further detail given the importance given to need within the planning submission. 3.3.1 of the Planning Statement indicates Kronospan "has embarked on the delivery of Vision 2025" which indicates this is a process underway, rather than a final document on which a need for development can be justified.

- request further information on the design evolution of the project and consideration of alternatives. More effective embedded mitigation might incorporate an alternative layout including tree planting to break up the very hard approach to parking. Can a better layout include both hard and soft landscaping to reduce landscape and visual impact. The existing lorry park achieves this with a mix of both hard parking provision alongside tree planting. Few parking schemes achieve effective integration into the landscape without internal planting. The proposed scheme will result in a very intrusive approach to the Chirk landscape. The site chosen is not within the existing complex of Kronospan and thus a better approach to embedded mitigation should be sought.

- we welcome the approach to the selection of viewpoints and the inclusion of sites at Chirk Castle and within the registered park and garden. Our landscape architect is considering the detail, and we will look to respond in detail on submission of the scheme. We do not agree with the conclusions in relation to viewpoints from NT

land that the scheme represents “a minor presence towards the rear of the view, and not result in significant environmental effect”.

-achieving screen planting from within the registered park and garden at Chirk is difficult due to the historical landscape restoration project implemented at the property. A 25-year programme of individual tree planting has been undertaken by NT based on an agreed planting plan dating back to January 1999. The scheme restores the work of 18th Century Landscape Designer William Emes at Chirk and brings forward individual tree planting across the castle landscape based on the 1760 layout. The scheme is due to be completed in 2023 and did not include significant massed tree planting which would be required to mitigate and screen viewpoints identified within the submitted LVIA. We are currently considering whether an amendment could/should be made to our planting plan to effect mitigation of the scheme brought forward by the pre application proposals. Any amendment would need to be discussed internally and if considered appropriate would need further discussion with CADW alongside the Welsh Historic Gardens Trust. Our view on further planting in the Chirk landscape is that inappropriate planting would be worse than no planting. We are happy to provide further detail on this as part of further discussions.

-we welcome the approach discussed verbally by the Canal and Rivers Trust to move forward a planting and Management Plan approach to screening on land within CRT ownership on the canal boundary. We would envisage such a scheme could move forward by Section 106 Agreement should Wrexham consider the proposals favourably.

-we welcome the additional mitigation planting plan provided at the further stakeholder pre application meeting. NT would support the implementation of all areas of tree planting brought forward within the plan and assume this could move forward as a planning condition if it was submitted as part of the full scheme. In terms of the specific proposals, we would have the following comments: 1. Specimen tree planting would contribute to reducing visual harm but have very limited backcloth to views across the proposed development from Chirk Castle, a more substantive tree planting scheme is required to mitigate effectively; 2. Support extensive tree planting in this area (and wider areas of the golf course) for mitigation of the proposed and existing development at Kronospan, potential further tree planting on land in CRT and NT ownership could be explored south of this area; 3. Support; 4 and 5 Support.

-we note proposals 3 (as above) which provide for offsite planting/screening near to Whitehurst Gardens Registered Park and Garden. Given the harm to the Chirk Castle Registered Park and Garden, we would suggest an enhancement/compensation heritage fund could be brought forward by Section 106 Agreement which could fund identified work to the linked Registered Park and Gardens of Chirk and Whitehurst.

-to help inform the position of National Trust we welcome sight of other parties' response to the pre application consultation which will help inform our considerations particularly CADW, Canal and Rivers Trust and the Welsh Historic Gardens Trust.

Thank you for the opportunity to comment.

Yours sincerely

John Pearson, Planning Adviser, National Trust

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Ymddiriedolaeth Genedlaethol/  
National Trust  
c/o Erddig Hall, Erddig, Wrexham.

[www.nationaltrust.org.uk](http://www.nationaltrust.org.uk)

Llywydd/President: His Majesty The King  
Cyfarwyddwr Dros Dro Cymru / Interim Director for Wales: Lhosa Daly

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





**CHIRK TOWN COUNCIL**  
**CYNGOR TREF Y WAUN**

Clerk  
Karen Brown  
Clerc

Tel: 01691 772596  
Email: [info@chirktowncouncil.org.uk](mailto:info@chirktowncouncil.org.uk)

Parish Hall  
Holyhead Road  
Chirk  
Wrexham  
LL14 5NA

11<sup>th</sup> November 2022

Axis PED Ltd  
Unit 11  
Well House Barns  
Chester Road  
Bretton  
Flintshire  
CH4 0DH

Dear Sir/Madam

The Council has given due consideration to the consultation on the pre-application for the North access road into the 3 Facility, lorry park, roundwood storage areas and associated structures, 132kV substation, and ancillary works – Kronospan, Chirk

The Council raises the following comments and concerns about this application:

- North Access Road
  - The Council is happy with the principle of the new access road.
  - The Council would like to seek clarification that all heavy goods vehicles would enter/exit the site this way once completed.
  - What would happen if the weighbridge was to go out of working order?
  - Can you confirm that the existing weighbridge would be decommissioned once the four new weighbridges are operational?
  - Concerns about traffic congestion between the existing roundabout at Whitehurst and the proposed new roundabout.
  
- Lorry Park
  - The Council's major concern is around noise levels as this is currently a quiet country area. The noise from the arriving and departing HGV's and the disconnecting and forklift trucks will be 24/7 and residents in Lodgevale Park will be directly affected.
  - The other major concern is in relation to the lighting of the lorry park – can you confirm if this would be floodlight? Again, this directly affects the residents of Lodgevale Park who are used to a dark sky in this area.
  - Can you provide a visual of how the barrier bund would look from Lodgevale Park?



**CHIRK TOWN COUNCIL**  
**CYNGOR TREF Y WAUN**

Clerk  
Karen Brown  
Clerc

Tel: 01691 772596  
Email: [info@chirktowncouncil.org.uk](mailto:info@chirktowncouncil.org.uk)

Parish Hall  
Holyhead Road  
Chirk  
Wrexham  
LL14 5NA

- Roundwood storage areas and associated structures
  - The Council has noise concerns – the current log stacks make a lot of noise and concern that these have been located closest to the residential area.
  - Consider another location for the storage area within the site.
  - The Council would like to express restrictions for use only between 8am – 8pm.
- The whole development site is on green belt land.
- Substation
  - The Council supports the move away from gas engines and the reduction of carbon emissions.

I shall be glad if you could ensure that the comments made by the Council are addressed fully in your planning application.

Yours sincerely,

Karen Brown  
Clerc a Swyddog Ariannol Cyfrifol / Clerk and Responsible Financial Officer  
Cyngor Tref Y Waun / Chirk Town Council

CC:

Mr Chris Emery, Kronsopan  
Mr Keith Baker, Kronsopan

Axis PED Ltd  
Well House Barns  
Chester Road  
Bretton  
Flintshire  
CH4 0DG

Your Ref N/a

Our Ref CRTR-PLAN-2022-37360

Friday 11 November 2022

Email: [consultations@axisped.co.uk](mailto:consultations@axisped.co.uk)

**Proposal:** Pre-application for the construction of a north access road, lorry park, roundwood storage areas and associated structures, 132kV substation and ancillary works on land immediately adjacent Kronospan Ltd, Chirk.

**Location:** Land adjacent to Kronospan Ltd, Chirk

**Waterway:** Llangollen Canal

Thank you for your pre-application consultation.

We are the charity who look after and bring to life 109 miles of canals in Wales. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of Wales. The Trust is known as Glandŵr Cymru, the Canal & River Trust in Wales and we are a statutory consultee in the Development Management process.

We have reviewed the pre-application consultation and based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended)) is that the Trust has **concerns** relating to the proposals in terms of the potential wider impact on the setting of the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS) and its Outstanding Universal Value.

We advise that **additional information** should be sought **prior to the submission** of the application to address these matters including:

- An updated Heritage Impact Assessment which considers and assess the Outstanding Universal Value of the World Heritage Site and in accordance with the updated UNESCO Guidance and Toolkit for Impact Assessments;
- A bat survey to show no impact on bat population using the canal and application site;
- Lighting contour plans to demonstrate no light spill to the canal corridor;
- An updated noise assessment which considers boaters as a receptor;

**Glandŵr Cymru**

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- A draft Woodland Management Plan.

Our advice and comments follow:

The Trust own and manage the Llangollen Canal and associated infrastructure which passes to the west of the site where the development is proposed. The canal corridor is within the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS) which was inscribed in 2009. The site the subject of this pre-application enquiry is within the buffer zone to the WHS. The canal is also a Scheduled Ancient Monument (SAM). The majority of the WHS and its buffer zone are also within the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB). There is a railway line and tree/hedgerow lined fields on the intervening land between the canal and site of the proposed lorry park and associated development. The canal is within a treelined cutting for a large part of the wider site boundary with Kronospan, towards where the development is proposed there are however some filtered views through the vegetation towards the site from the canal corridor.

Our following comments are split between the potential impact on the canal corridor adjacent to the site and the impacts on the wider World Heritage Site. The Trust are the principal landowner and custodian of the WHS and the body with responsibility for the canal and the majority of its structures and assets.

#### Potential impacts on the Llangollen canal adjacent to the site

The proposed lorry park and associated works would be set approximately 70m from the canal corridor and as such would not have any direct impact on the structural integrity of the canal infrastructure or its operation. As part of the mitigation planting an area of woodland would be planted within a field next to the canal as shown on the Illustrative Landscape Masterplan, it is unlikely that the roots from the planted trees would have any long-term impact on the stability of the canal. It may however be appropriate for the trees planted closest to the canal corridor to include some form of root guard to prevent them penetrating the clay lining of the canal and cause associated seepage and potential stability issues.

It is understood that the tallest structure on site would be the 9m high weighbridge (as shown on the elevations) and light columns which would be 8m high. A Landscape and Visual Impact Assessment (LVIA) is included in the pre-application package and shows that viewpoints from the canal corridor have been considered and assessed. Indeed, this includes viewpoint K, J, M, N and T of these only minor views from J and T near the marina are possible towards the site. These viewpoints demonstrate that only minor filtered views would be possible in the winter months when trees are not in leaf. The LVIA chapter in the Environmental Statement concludes the development would have a short term visual impact (albeit minor and filtered from around Chirk Marina). It is proposed that this impact will be all but mitigated by the landscape planting when established.

In terms of lighting only a brief assessment seems to have been provided within the planning statement. Based on this it would appear that there would be no impact on the canal given the separation distance and given the existing and proposed tree cover. It would be useful to review a lighting contour plan to confirm this and to review the potential for light spill outside of the site. Given the distance to the canal corridor the impact of lighting is likely to be minimal. That said, bats are very susceptible to lighting and protected bat species are known to be present along the canal corridor. It is noted that the package of assessments does not include the completion of any bat surveys. The baseline report states no bat records were known for the site, so the assessment and mitigation proposals are purely based on assumption. It would be important to understand whether any species that use the canal are also present within the application site and may be affected and mitigated accordingly. We consider that the application ought to be informed by a bat survey given the known bat populations along the canal corridor.

The noise chapter of the Environmental Statement and studies appear comprehensive however we note that based on the noise mapping results there does appear to be the potential for some noise disturbance towards [Glandŵr Cymru](#)

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the canal. We note that within the noise assessment that there is no reference to live aboard boaters, especially related to Chirk marina (although not owned or managed by us) or boaters in general. We consider that the noise assessment ought to have considered and assessed boaters as a receptor to noise especially during construction and operation, as the site will be operational 24/7.

In terms of flooding and drainage, it is understood that drainage would be attenuated on site and discharged to the existing brook/stream which passes thorough the site. Subject to that being the final drainage strategy this would be acceptable to the Trust as it would have no impact on the canal. We note that the flood risk assessment concludes that the canal is 70m from the site and at a lower level than the site and as such not a flood risk and we would concur with this assessment.

Finally, it would be useful to be able to review the biodiversity net gain calculations, as there is some discrepancy between the amount of hedgerow to be planted (sometimes 1.3km, sometimes 1.8km) and as biodiversity net gain is claimed by the proposals, but not evidenced.

In conclusion, in terms of the direct impact on the Llangollen canal, it is unlikely that the proposed development would have a demonstrable direct adverse impact, we would however welcome clarification in terms of a bat survey, lighting contour plans and for the noise assessment to consider boaters as a receptor.

### Wider world heritage site impacts and concerns

As set out above the canal corridor is within the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS) which was inscribed in 2009. The application site is within the buffer zone of the WHS and as such within its setting. To be included on the World Heritage List, sites must have Outstanding Universal Value (OUV), the site needs to be carefully managed over the long-term to maintain this status. Development within the WHS and its buffer zone therefore also needs to be carefully managed to retain what is important about protecting the OUV of the World Heritage Site and its setting.

We note that the updated UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context document 2022, does not appear to have been considered. The Heritage Impact Assessment and development proposals should be updated and carried out and assessed in full accordance with this guidance and methodology.

The Cadw 'Managing Change in World Heritage Sites in Wales' document May 2017 supplements the relevant sections of Planning Policy Wales and Technical Advice Note 24: The Historic Environment and provides guidance for considering and assessing proposals that might impact World Heritage Sites.

Furthermore, paragraph 5.7 of Managing Change in World Heritage Sites in Wales document May 2017 sets out that "When an EIA is required for development that impacts upon the Outstanding Universal Value and attributes of a World Heritage Site, it should include an assessment of the significant impacts. These impacts could be considered through a heritage impact assessment. A heritage impact assessment is a methodology that focuses on the Outstanding Universal Value and the attributes which contribute to it. Guidance on the heritage impact assessment process is provided by ICOMOS. ICOMOS advises that there should be a chapter specific to World Heritage in the EIA and that the heritage impact assessment itself should be attached as a technical appendix."

The heritage impact assessment submitted with this pre-application enquiry notes that the assessment has been informed by the ICOMOS Guidance (para 2.3.1), however the submitted document does not appear to offer such an assessment in terms of the potential impact of the development on the Outstanding Universal Value of the WHS and the attributes that contribute to it. This ought to be addressed within an updated heritage impact assessment and should be used to inform the design of the development and mitigation. Due regard also needs to be given to the updated UNESCO guidance, toolkit and methodology as outlined above.

### **Glandŵr Cymru**

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The buffer zone to the WHS has a value in its own right as it creates a sense of arrival and requires protection relating to its setting and to significant views. Setting includes *'the surroundings in which a historic asset is understood, experienced and appreciated, embracing past and present relationships to the surrounding landscape'* ([Best-practice guidance | Cadw \(gov.wales\)](#)). Importantly for the Pontcysyllte Aqueduct and Canal World Heritage Site, setting relates to how a site was intended to fit into the landscape, the views from it, and how the site is seen from the surrounding area.

We consider further consideration needs to be given to this point, especially given the conclusion of the Heritage Impact Assessment at paragraph 7.1.3 which confirms that the development would change the character of the landscape in this area. *"The proposed development site sits within the WHS Buffer Zone and would directly impact c. 10 ha of this area. It will not directly impact any specific heritage asset, but it would change the character of the landscape in this area."*

We consider that the Heritage Impact Assessment should be updated to include an assessment and consideration of the Outstanding Universal Value of the WHS as set out within the updated UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context document 2022 and in particular how the site fits into the wider historic landscape and setting of the WHS, its intrinsic OUV and the views from it, and how the site is seen from the surrounding area.

### Woodland Management

The Trust own and manage a narrow corridor of woodland associated with the canal cutting adjacent to the site which forms part of the buffer/screen of the development site (and existing complex of buildings/structures within the Kronospan site). At pre-application meetings we have discussed the potential for woodland management within the area to supplement the woodland planting which has already been undertaken by Kronospan. In principle we would support our woodland along the canal corridor being included in such a management plan. However, as trees die/are removed on the canal cutting this would need to be carefully managed as the tree roots might be providing support to the stability of the cutting. We would need to ensure that tree roots are treated appropriately. Fortunately, at this stage there are no signs of old/decaying trees causing instability along the cutting. We would need to ensure a suitable woodland management plan is formed specifying the locations of tree planting and removal on and in close proximity to the canal cutting.

As part of the proposal to mitigate the visual impact of the development it is proposed to plant a field next to the canal with woodland. This is shown on the illustrate landscape masterplan with the light green shading showing new woodland planting. That plan also shows the previous planting undertaken along the canal corridor. We consider that prior to the planning of the field next to the canal, regard should be given to whether it should be the subject to some form of archaeological assessment prior to planting given proximity to the canal SAM. The woodland planting alongside the canal is welcomed however we would request a Landscape and Ecology Management Plan/Tree Management Plan (or similar) to be submitted to understand how this would be managed in the long term.

Given the success of the landscape planting is integral to minimising the potential impact of the development, it is critical that the woodland is managed in the long term. This would include the existing tree stock and the proposed new planting. It is likely that such a woodland management plan would be required to be secured via a s106 agreement. Any such woodland management ought to be carried out for the lifetime of the development, however we consider that it would be more reasonable for the management plan to cover an initial 20-25 year period, this would ensure that the new woodland planting establishes and matures. This should all be funded by the applicant. The management plan ought to also include a mechanism within it to be periodically reviewed and updated to take into account new development proposals and matters that may have arisen. A new management

### **Glandŵr Cymru**

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

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plan would likely be required after the 20-25 year period. We consider that a draft woodland management plan should be submitted with the application.

The above comments are given as advice based on the consultation material. The above comments do not prejudice any further comments or matters that may be raised by the Trust at a later stage.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

**Tim Bettany-Simmons MRTPI**  
Area Planner & Special Projects

Tim.Bettany-Simmons@canalrivertrust.org.uk

07342 057926

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

**Glandŵr Cymru**

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

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## Bobby Clayton

---

**From:** Bobby Clayton  
**Sent:** 10 December 2022 12:58  
**To:** Bobby Clayton  
**Subject:** FW: 3046-01/BC

Regards,

**Bobby Clayton**  
Associate



[bobbyclayton@axisped.co.uk](mailto:bobbyclayton@axisped.co.uk)

T: 0844 8700 007\* | M: 07951936030

Bretton, Chester, CH4 0DH

[www.axisped.co.uk](http://www.axisped.co.uk)

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**From:** Alex Forster <[Alex.Forster@wwutilities.co.uk](mailto:Alex.Forster@wwutilities.co.uk)>

**Sent:** 20 October 2022 15:06

**To:** Consultations <[consultations@axisped.co.uk](mailto:consultations@axisped.co.uk)>

**Subject:** 3046-01/BC

Good Afternoon,

As there is high pressure gas main present, a site visit will be required for this location

Can you please provide the following information, at least **10 working days** before your works are due to commence, so we can establish whether or not a site visit is necessary;

- A plan showing the exact location and extent of your works along with a full site address
- An overview of the works taking place
- Site contact details
- The date that your works are set to commence
- A copy of your Risk Assessment and Method Statement (RAMS), if you are planning any excavation within the vicinity of our pipeline

**Works in close proximity to a Medium, Intermediate or High pressure main cannot commence until you have received approval from Wales & West Utilities.**

Please respond to [Dig@wwutilities.co.uk](mailto:Dig@wwutilities.co.uk) to ensure your response is actioned.

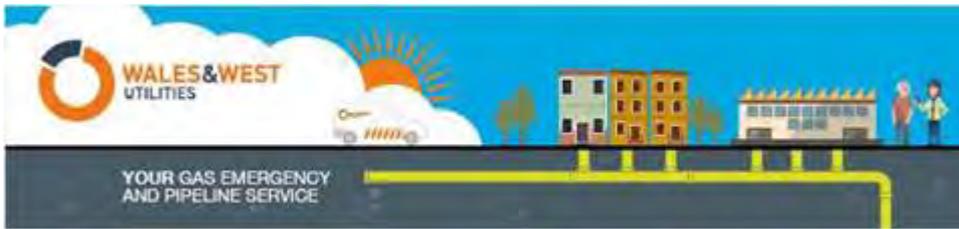
Kind Regards,

Alex Forster

**Plant Protection Team, Administrative Assistant**

Tel: 02920 278912 | Direct: 02920 278736 | Email: [Alex.Forster@wwutilities.co.uk](mailto:Alex.Forster@wwutilities.co.uk)

Wales & West Utilities Ltd | Wales & West House | Spooner Close | Coedkernew | Newport | NP10 8FZ

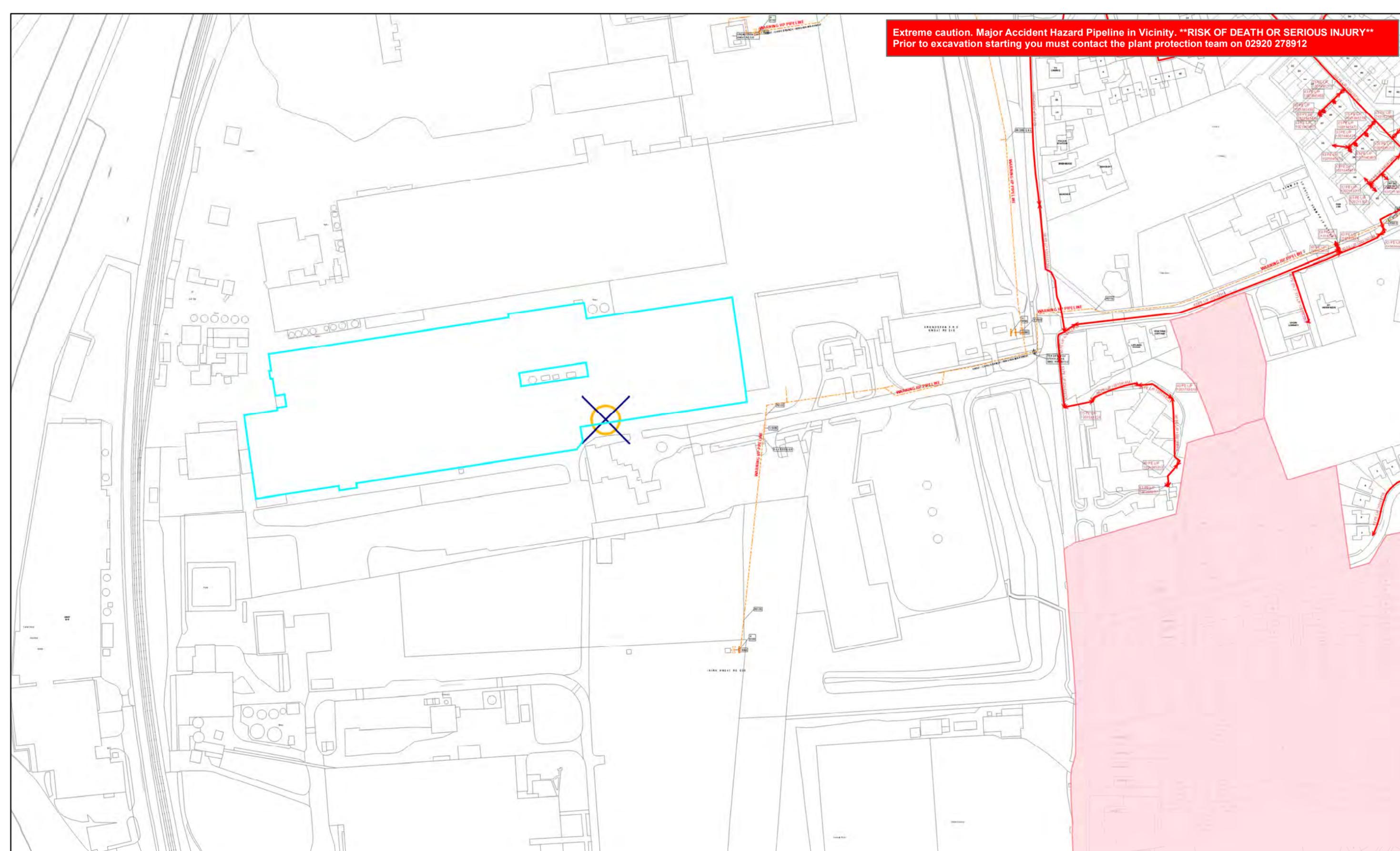


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***Please note, that from Monday 11<sup>th</sup> July, our cost for the provision of mapping data through LSBUD will increase to £47 +***

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**Extreme caution. Major Accident Hazard Pipeline in Vicinity. \*\*RISK OF DEATH OR SERIOUS INJURY\*\*  
Prior to excavation starting you must contact the plant protection team on 02920 278912**



Scale	1:2,500
User ID	
Date	20/10/2022
Grid Ref:	328,776 338,277
<b>NRSWA Response</b>	

Low Pressure	IGT/Other Polygon
Medium Pressure	Contact Zones
Intermediate Pressure	NTS Pipeline
High Pressure	

Some examples of Plant Items:

Valve	Depth of Cover	Syphon	Circle
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**TITLE: Print Out**

The plan shows those pipes owned by Wales & West Utilities (WU) in its role as a Licensed Gas Transporter (GT). The information shown on this plan is derived from historic information and may have involved re-scaling plans, and the accuracy of it cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc. may not be shown but their presence should be anticipated. No warranties are therefore given in respect of it. WU its employees and contractors do not accept any liability for any inaccuracy or incompleteness in it.

You must use safe digging practices, in accordance with HS(G)47, to establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you or near gas apparatus. The information shown on this plan should not be used beyond 28 days from the date of issue of this plan as it is subject to updating.

The plan also provides indications of gas pipes owned by other GTs, or otherwise privately owned, which may be present in this area. This information is not information of WU and WU is unable to verify this information or to confirm whether it is accurate or complete. It is supplied voluntarily to assist the user in determining whether to make contact with other GTs or others. The user must obtain such information from the other GT or person concerned. WU, its employees and contractors do not accept any liability for this information or any inaccuracy or incompleteness in it.

**WALES & WEST UTILITIES**

Wales and West Utilities Ltd., Wales and West House, Spooner Close, Celtic Springs, Coedkernew, Newport, NP10 8FZ

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**APPENDIX H**  
**APPLICANT RESPONSES TO SPECIALIST CONSULTEE RESPONSES**

Ref	Consultee	Comment / Response	Topic	Theme / Category	Applicant Response
1	Cadw	The proposed development represents a large extension of the Kronospan site onto open countryside in the identified buffer zone of the World Heritage Site. In particular, the size of the proposed lorry park is considerably larger than the existing parking areas, which causes considerable concern that the development will have an adverse impact on the outstanding universal value of the World Heritage Site. Whilst chapter 3 of the environmental statement discusses alternative sites in the immediate area of the Kronospan site and its environs, there is no consideration of establishing a lorry park outside the buffer zone of the World Heritage Site to hold lorries until they are required to be unloaded. The current system requires lorries to arrive at the plant in pre-arranged times, this has led to lorries using parking facilities on the trunk road network to await their allocated time, resulting in some congestion in those area. A lorry park outside the buffer zone would therefore alleviate this issue and allow storage of trailers and potentially, in the long-term, allow a maintenance facility to be developed, without an adverse impact on the outstanding universal values of the World Heritage Site. Chapter 3 should therefore consider the potential of developing some of the proposed development on a site outside the World Heritage Site buffer zone.	Alternatives	Alternative site - lorry park	Further detail has been added to Section 3.2 of ES Chapter 3.0 (Alternatives) to describe how the current Kronospan Facility manages HGVs using a shunting operation. This provides substantial environmental and operational benefits that can only be realised by managing the access and egress of HGVs (and their loading and unloading) on site.
2	Cadw	It is noted in Section 3.5.6 of the Planning Statement that the existing HGV parking will be repurposed in the future for improved staff, visitor and contractor car parking. As such, there is a need for an explanation why an additional carpark is required as part of the proposed development.	Project Description	Need case - car park	The proposed weighbridges would be approximately 750m north of the existing car parking at the southern extent of the Kronospan Facility. A new car park for staff and visitors associated with the operation of the proposed weighbridges would remove the requirement for staff and visitors to walk the 750m distance through the Kronospan Facility improving the efficiency of site operations and health and safety. Further information has been added to Section 4.4 of ES Chapter 4.0 (Description of the Proposed Development).
3	Cadw	The archaeological evaluation has located a limekiln, which, section 7.1.12 of the resulting report suggests, appears to have been dismantled. A date for this limekiln was not established during the evaluation, although it is probably early 19th century or earlier, especially as it is not recorded on the historic maps, so far, consulted by the archaeologists. If the limekiln has been dismantled it implies that it was not required any more, which rises the strong implication that its construction and use relates to a major building project, rather than for agricultural purposes. The major construction project carried out in close proximity to the limekiln, in the period it would have been use, is the Pontcysyllte Canal. There is therefore a strong likelihood that the limekiln was used in the construction of the Canal. This association would considerably raise the significance of the limekiln to National level. Consequently, there is a clear need for further research on this limekiln to be carried out, particularly consulting the construction records for the canal, so that the significance of the limekiln can be determined.	Historic Environment	Archaeological Evaluation - lime kiln	Archival research will be undertaken during determination of the planning application including archives held at National Library Wales, Northeast Wales Archives and Canal and River Trust Archives.  The detailed design of the Proposed Development will take into account the presence of the lime kiln; a 2m buffer (to be confirmed with Cadw) will be enforced during any works to ensure preservation in situ.
4	Cadw	The impact of the lighting required for the proposed development has not been considered in chapter 6 of the environmental statement. In particular, no consideration has been given to the impact of lighting on Chirk Castle and its registered historic park and garden or the World Heritage Site and its buffer, (parts of which are at a much higher level than the application area) within the lighting assessment which is included as Appendix D of the planning statement prepared for the application.	Historic Environment	Lighting Impacts	The Lighting Assessment at Planning Statement Appendix D has been revised to specifically consider effects on these two heritage assets.  The assessment of night-time landscape and visual effects set out in ES Chapter 5 Landscape and Visual Effects (Section 5.6) has been revised to specifically address effects on these assets.  ES Chapter 6.0 (Historic Environment) has been revised to ensure potential night-time effects upon setting are assessed.

Ref	Consultee	Comment / Response	Topic	Theme / Category	Applicant Response
5	Cadw	A heritage impact assessment has been produced considering the impact of the proposed development on the World Heritage Site: However, this work does not follow the guidance given in the UNESCO document Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022). There is therefore a need for a new heritage impact assessment to be prepared following this guidance. Once this assessment and the others identified above have been completed than Chapter 6 of the Environmental Statement will need to be revised to incorporate their results. This revision may lead to a requirement that the design of the proposed development will need to be altered and additional mitigation measures may also need to be included.	Historic Environment	WHS Guidance 2022	Heritage Impact Assessment (Appendix 6.3) has been revised following new guidance.
6	National Trust	Request a full and proper heritage impact assessment using 2022 World Heritage Site methodology.	Historic Environment	WHS Guidance 2022	Heritage Impact Assessment (Appendix 6.3) has been revised following new guidance.
7	National Trust	Concerned about the implications of the proposed scheme on the status of World Heritage Site for Chirk, particularly in relation to the sense of arrival and WHS buffer zone. We welcome sight of interested parties' responses to the consultation in relation to WHS status.	Historic Environment	WHS - sense of arrival and buffer zone impacts	Heritage Impact Assessment (Appendix 6.3) has been revised.
8	National Trust	Request further consideration of Chirk castle in relation to the lighting assessment.	Historic Environment	Lighting Impacts	See response to Reference 4 above.
9	National Trust	Would request further detail on the justification for the scheme based on a Vision 2025 ambition, and the lack of detail on what constitutes a Chirk Kronospan 2025 Vision. NT contributed to the previous Vision 2020 which includes none of the development proposed within the current pre application, and no similar process has been undertaken for Vision 2025. A simple Google search on Kronospan 2025 Vision has no detail on proposals for Chirk and includes schemes such as "Kaindl GmbH to build large biomass cogeneration by 2025". 8.1.2 of the Planning Statement summarises need based on a 2025 Vision without any detail. We would welcome further detail given the importance given to need within the planning submission. 3.3.1 of the Planning Statement indicates Kronospan "has embarked on the delivery of Vision 2025" which indicates this is a process underway, rather than a final document on which a need for development can be justified.	Need Case	Vision 2025	Further detail regarding Vision 2025 has been added to Section 3.3 of the Planning Statement and Section 1.4 of ES Chapter 1.0 (Introduction). The Kronospan Vision 2025 document is included as Annex A to the Planning Statement.
10	National Trust	Request further information on the design evolution of the project and consideration of alternatives. More effective embedded mitigation might incorporate an alternative layout including tree planting to break up the very hard approach to parking. Can a better layout include both hard and soft landscaping to reduce landscape and visual impact. The existing lorry park achieves this with a mix of both hard parking provision alongside tree planting. Few parking schemes achieve effective integration into the landscape without internal planting. The proposed scheme will result in a very intrusive approach to the Chirk landscape. The site chosen is not within the existing complex of Kronospan and thus a better approach to embedded mitigation should be sought.	LVIA	Landscape Masterplan	Further detail regarding design evolution has been added to ES Chapter 3.0 (Alternatives) and to the Design and Access Statement.
11	National Trust	We welcome the approach to the selection of viewpoints and the inclusion of sites at Chirk Castle and within the registered park and garden. Our landscape architect is considering the detail, and we will look to respond in detail on submission of the scheme. We do not agree with the conclusions in relation to viewpoints from NT land that the scheme represents "a minor presence towards the rear of the view, and not result in significant environmental effect".	LVIA	LVIA	Noted

Ref	Consultee	Comment / Response	Topic	Theme / Category	Applicant Response
12	National Trust	Achieving screen planting from within the registered park and garden at Chirk is difficult due to the historical landscape restoration project implemented at the property. A 25-year programme of individual tree planting has been undertaken by NT based on an agreed planting plan dating back to January 1999. The scheme restores the work of 18th Century Landscape Designer William Emes at Chirk and brings forward individual tree planting across the castle landscape based on the 1760 layout. The scheme is due to be completed in 2023 and did not include significant massed tree planting which would be required to mitigate and screen viewpoints identified within the submitted LVIA. We are currently considering whether an amendment could/should be made to our planting plan to effect mitigation of the scheme brought forward by the pre application proposals. Any amendment would need to be discussed internally and if considered appropriate would need further discussion with CADW alongside the Welsh Historic Gardens Trust. Our view on further planting in the Chirk landscape is that inappropriate planting would be worse than no planting. We are happy to provide further detail on this as part of further discussions.	Off-Site Planting	Off-Site Planting	Noted
13	National Trust	We welcome the approach discussed verbally by the Canal and Rivers Trust to move forward a planting and Management Plan approach to screening on land within CRT ownership on the canal boundary. We would envisage such a scheme could move forward by Section 106 Agreement should Wrexham consider the proposals favourably.	Off-Site Planting	Off-Site Planting	The Applicant is happy to provide a Woodland Management Plan as part of a Section 106 Agreement (s106) which would be drawn up in consultation with the CRT should planning permission be granted.  The suggested scope of landscape-related elements of the s106 are set out in ES Chapter 5 Landscape and Visual Effects (Section 5.8).
14	National Trust	We welcome the additional mitigation planting plan provided at the further stakeholder pre application meeting. NT would support the implementation of all areas of tree planting brought forward within the plan and assume this could move forward as a planning condition if it was submitted as part of the full scheme. In terms of the specific proposals, we would have the following comments: 1. Specimen tree planting would contribute to reducing visual harm but have very limited backcloth to views across the proposed development from Chirk Castle, a more substantive tree planting scheme is required to mitigate effectively; 2. Support extensive tree planting in this area (and wider areas of the golf course) for mitigation of the proposed and existing development at Kronospan, potential further tree planting on land in CRT and NT ownership could be explored south of this area; 3. Support; 4 and 5 Support.	Off-Site Planting	Off-Site Planting	Off-site landscape enhancement measures within the Kronospan landholding are illustrated on Figure 4.3b and described in ES Chapter 4.0 (Description of the Proposed Development) and in ES Chapter 5 Landscape and Visual Effects (Section 5.8).  Further off-site enhancements on third party land will be identified in consultation with landowners.
15	National Trust	We note proposals 3 (as above) which provide for offsite planting/screening near to Whitehurst Gardens Registered Park and Garden. Given the harm to the Chirk Castle Registered Park and Garden, we would suggest an enhancement/compensation heritage fund could be brought forward by Section 106 Agreement which could fund identified work to the linked Registered Park and Gardens of Chirk and Whitehurst.	Historic Environment	Heritage Fund	The Applicant is happy to provide a heritage fund as part of a Section 106 Agreement (s106) which would be drawn up in consultation with National Trust and other relevant stakeholders should planning permission be granted.  The suggested scope of the heritage fund is set out in ES Chapter 6 Historic Environment (Section 6.8).
16	National Trust	To help inform the position of National Trust we welcome sight of other parties' response to the pre application consultation which will help inform our considerations particularly CADW, Canal and Rivers Trust and the Welsh Historic Gardens Trust.	Historic Environment	General	Noted
17	Canal and River Trust	The proposed lorry park and associated works would be set approximately 70m from the canal corridor and as such would not have any direct impact on the structural integrity of the canal infrastructure or its operation. As part of the mitigation planting an area of woodland would be planted within a field next to the canal as shown on the Illustrative Landscape Masterplan, it is unlikely that the roots from the planted trees would have any long term impact on the stability of the canal. It may however be appropriate for the trees planted closest to the canal corridor to include some form of root guard to prevent them penetrating the clay lining of the canal and cause associated seepage and potential stability issues.	LVIA	Landscape Masterplan	Any protective measures required would be set out in detailed landscape proposals which would be the subject of a planning condition. The Applicant does not envisage any issues in providing root guards/barriers should these prove necessary.  No change to the Illustrative Landscape Masterplan (Figure 4.3a) is required.

Ref	Consultee	Comment / Response	Topic	Theme / Category	Applicant Response
18	Canal and River Trust	In terms of lighting only a brief assessment seems to have been provided within the planning statement. Based on this it would appear that there would be no impact on the canal given the separation distance and given the existing and proposed tree cover. It would be useful to review a lighting contour plan to confirm this and to review the potential for light spill outside of the site. Given the distance to the canal corridor the impact of lighting is likely to be minimal.	Lighting impacts	Lighting Impacts	The Lighting Assessment at Planning Statement Appendix D provides a description of the proposed lighting arrangement together with an assessment of its impact on nearby receptors. Anticipated light spill from the Proposed Development is illustrated at drawing SK-03 in the lighting assessment.
19	Canal and River Trust	That said, bats are very susceptible to lighting and protected bat species are known to be present along the canal corridor. It is noted that the package of assessments does not include the completion of any bat surveys. The baseline report states no bat records were known for the site, so the assessment and mitigation proposals are purely based on assumption. It would be important to understand whether any species that use the canal are also present within the application site and may be affected and mitigated accordingly. We consider that the application ought to be informed by a bat survey given the known bat populations along the canal corridor.	Biodiversity	Bat Surveys	The precautionary approach taken during the assessment and design of mitigation measures (namely the lighting strategy and landscape planting) to be sufficient to address impacts to bats without the requirement for additional survey.  Please also refer to the response from NRW (Reference 75) stating they consider the potential impact pathway on lesser horseshoe bats (a particularly light sensitive bat species) adequately addressed.
20	Canal and River Trust	The noise chapter of the Environmental Statement and studies appear comprehensive however we note that based on the noise mapping results there does appear to be the potential for some noise disturbance towards the canal. We note that within the noise assessment that there is no reference to live aboard boaters, especially related to Chirk marina (although not owned or managed by us) or boaters in general. We consider that the noise assessment ought to have considered and assessed boaters as a receptor to noise especially during construction and operation, as the site will be operational 24/7.	Noise and Vibration	Boating Receptors	A new receptor location (R7) is now included in ES Chapter 8 (Noise and Vibration) for live aboard boaters at Chirk Marina and along the canal. Although R7 is further away from the Proposed Development than receptor R3 (Afon Bradley Farm) and therefore noise and vibration impacts experienced at R7 would be lower than at R3, baseline noise levels are assumed to be similar due to distance from Holyhead Road and location.
21	Canal and River Trust	In terms of flooding and drainage, it is understood that drainage would be attenuated on site and discharged to the existing brook/stream which passes thorough the site. Subject to that being the final drainage strategy this would be acceptable to the Trust as it would have no impact on the canal. We note that the flood risk assessment concludes that the canal is 70m from the site and at a lower level than the site and as such not a flood risk and we would concur with this assessment.	Flood Risk and Drainage	Drainage Scheme	Noted
22	Canal and River Trust	Finally, it would be useful to be able to review the biodiversity net gain calculations, as there is some discrepancy between the amount of hedgerow to be planted (sometimes 1.3km, sometimes 1.8km) and as biodiversity net gain is claimed by the proposals, but not evidenced.	Biodiversity	Net Gain Calculations	References to hedgerow lengths have been updated. A quantitative approach to biodiversity net gain is currently not required by national or local planning policy in Wales; the qualitative assessment undertaken is considered sufficient, given the low biodiversity value of modified grasslands that dominate the Application Site.
23	Canal and River Trust	In conclusion, in terms of the direct impact on the Llangollen canal, it is unlikely that the proposed development would have a demonstrable direct adverse impact, we would however welcome clarification in terms of a bat survey, lighting contour plans and for the noise assessment to consider boaters as a receptor.	Historic Environment	General	See responses to References 18, 19 and 20.
24	Canal and River Trust	As set out above the canal corridor is within the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS) which was inscribed in 2009. The application site is within the buffer zone of the WHS and as such within its setting. To be included on the World Heritage List, sites must have Outstanding Universal Value (OUV), the site needs to be carefully managed over the long-term to maintain this status. Development within the WHS and its buffer zone therefore also needs to be carefully managed to retain what is important about protecting the OUV of the World Heritage Site and its setting.  We note that the updated UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context document 2022, does not appear to have been considered. The Heritage Impact Assessment and development proposals should be updated and carried out and assessed in full accordance with this guidance and methodology.	Historic Environment	WHS Guidance 2022	Heritage Impact Assessment (Appendix 6.3) has been revised accordingly.
25	Canal and River Trust	The Cadw 'Managing Change in World Heritage Sites in Wales' document May 2017 supplements the relevant sections of Planning Policy Wales and Technical Advice Note 24: The Historic Environment and provides guidance for considering and assessing proposals that might impact World Heritage Sites.	Historic Environment	Other WHS Guidance	Heritage Impact Assessment (Appendix 6.3) has been revised accordingly.

Ref	Consultee	Comment / Response	Topic	Theme / Category	Applicant Response
26	Canal and River Trust	Furthermore, paragraph 5.7 of Managing Change in World Heritage Sites in Wales document May 2017 sets out that "When an EIA is required for development that impacts upon the Outstanding Universal Value and attributes of a World Heritage Site, it should include an assessment of the significant impacts. These impacts could be considered through a heritage impact assessment. A heritage impact assessment is a methodology that focuses on the Outstanding Universal Value and the attributes which contribute to it. Guidance on the heritage impact assessment process is provided by ICOMOS. ICOMOS advises that there should be a chapter specific to World Heritage in the EIA and that the heritage impact assessment itself should be attached as a technical appendix."	Historic Environment	Other WHS Guidance	Heritage Impact Assessment (Appendix 6.3) has been revised accordingly.
27	Canal and River Trust	The heritage impact assessment submitted with this pre-application enquiry notes that the assessment has been informed by the ICOMOS Guidance (para 2.3.1), however the submitted document does not appear to offer such an assessment in terms of the potential impact of the development on the Outstanding Universal Value of the WHS and the attributes that contribute to it. This ought to be addressed within an updated heritage impact assessment and should be used to inform the design of the development and mitigation. Due regard also needs to be given to the updated UNESCO guidance, toolkit and methodology as outlined above.	Historic Environment	Other WHS Guidance	Heritage Impact Assessment (Appendix 6.3) has been revised accordingly.
28	Canal and River Trust	<p>The buffer zone to the WHS has a value in its own right as it creates a sense of arrival and requires protection relating to its setting and to significant views. Setting includes <i>'the surroundings in which a historic asset is understood, experienced and appreciated, embracing past and present relationships to the surrounding landscape'</i> <a href="https://cadw.gov.wales/advice-support/historic-assets/scheduled-monuments/best-practice-guidance#section-caring-for-coastal-heritage">https://cadw.gov.wales/advice-support/historic-assets/scheduled-monuments/best-practice-guidance#section-caring-for-coastal-heritage</a></p> <p>Importantly for the Pontcysyllte Aqueduct and Canal World Heritage Site, setting relates to how a site was intended to fit into the landscape, the views from it, and how the site is seen from the surrounding area.</p> <p>We consider further consideration needs to be given to this point, especially given the conclusion of the Heritage Impact Assessment at paragraph 7.1.3 which confirms that the development would change the character of the landscape in this area. "The proposed development site sits within the WHS Buffer Zone and would directly impact c. 10 ha of this area. It will not directly impact any specific heritage asset, but it would change the character of the landscape in this area."</p>	Historic Environment	Other WHS Guidance	Heritage Impact Assessment (Appendix 6.3) has been revised accordingly.
29	Canal and River Trust	We consider that the Heritage Impact Assessment should be updated to include an assessment and consideration of the Outstanding Universal Value of the WHS as set out within the updated UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context document 2022 and in particular how the site fits into the wider historic landscape and setting of the WHS, its intrinsic OUV and the views from it, and how the site is seen from the surrounding area.	Historic Environment	WHS Guidance 2022	Heritage Impact Assessment (Appendix 6.3) has been revised accordingly.
30	Canal and River Trust	The Trust own and manage a narrow corridor of woodland associated with the canal cutting adjacent to the site which forms part of the buffer/screen of the development site (and existing complex of buildings/structures within the Kronospan site). At pre-application meetings we have discussed the potential for woodland management within the area to supplement the woodland planting which has already been undertaken by Kronospan. In principle we would support our woodland along the canal corridor being included in such a management plan. However, as trees die/are removed on the canal cutting this would need to be carefully managed as the tree roots might be providing support to the stability of the cutting. We would need to ensure that tree roots are treated appropriately. Fortunately, at this stage there are no signs of old/decaying trees causing instability along the cutting. We would need to ensure a suitable woodland management plan is formed specifying the locations of tree planting and removal on and in close proximity to the canal cutting.	LVIA	Woodland Management Plan	<p>The Applicant is happy to provide a Woodland Management Plan as part of a Section 106 Agreement (s106) which would be drawn up in consultation with the CRT should planning permission be granted.</p> <p>The suggested scope of landscape-related elements of the s106 are set out in ES Chapter 5 Landscape and Visual Effects (Section 5.8).</p>

Ref	Consultee	Comment / Response	Topic	Theme / Category	Applicant Response
31	Canal and River Trust	<p>As part of the proposal to mitigate the visual impact of the development it is proposed to plant a field next to the canal with woodland. This is shown on the illustrate landscape masterplan with the light green shading showing new woodland planting. That plan also shows the previous planting undertaken along the canal corridor.</p> <p>We consider that prior to the planning of the field next to the canal, regard should be given to whether it should be the subject to some form of archaeological assessment prior to planting given proximity to the canal SAM.</p>	Historic Environment	Archaeological Evaluation - canal planting	Consultation with CPAT-DC regarding the written scheme of investigation confirmed that these works would not be required/proportionate in this location; any below ground archaeology would likely already be disturbed during the construction of the railway and canal.
32	Canal and River Trust	<p>As part of the proposal to mitigate the visual impact of the development it is proposed to plant a field next to the canal with woodland. This is shown on the illustrate landscape masterplan with the light green shading showing new woodland planting. That plan also shows the previous planting undertaken along the canal corridor.</p> <p>The woodland planting alongside the canal is welcomed however we would request a Landscape and Ecology Management Plan/Tree Management Plan (or similar) to be submitted to understand how this would be managed in the long term.</p>	LVIA	Woodland Management Plan	The Applicant is happy to provide such a document as part of a planning condition or a Section 106 Agreement (s106) should planning permission be granted.
33	Canal and River Trust	<p>Given the success of the landscape planting is integral to minimising the potential impact of the development, it is critical that the woodland is managed in the long term. This would include the existing tree stock and the proposed new planting. It is likely that such a woodland management plan would be required to be secured via a s106 agreement. Any such woodland management ought to be carried out for the lifetime of the development, however we consider that it would be more reasonable for the management plan to cover an initial 20-25 year period, this would ensure that the new woodland planting establishes and matures. This should all be funded by the applicant. The management plan ought to also include a mechanism within it to be periodically reviewed and updated to take into account new development proposals and matters that may have arisen. A new management plan would likely be required after the 20-25 year period. We consider that a draft woodland management plan should be submitted with the application.</p>	LVIA	Woodland Management Plan	<p>The Applicant is happy to provide a Woodland Management Plan as part of a Section 106 Agreement (s106) which would be drawn up in consultation with the CRT should planning permission be granted.</p> <p>The suggested scope of landscape-related elements of the s106 are set out in ES Chapter 5 Landscape and Visual Effects (Section 5.8).</p>
34	Chirk Town Council	North Access Road - The Council is happy with the principle of the new access road.	North access road	North access road	Noted
35	Chirk Town Council	North Access Road - The Council would like to seek clarification that all heavy goods vehicles would enter/exit the site this way once completed.	North access road	North access road	Section 4.3 of ES Chapter 4.0 (Description of the Proposed Development) states that 'Access and egress to the Site would be via the proposed north access road; HGV access/egress via the existing access off the B5070 would be in exceptional/emergency circumstances only.'
36	Chirk Town Council	North Access Road - What would happen if the weighbridge was to go out of working order?	Weighbridge	Weighbridge	Four weighbridges are proposed (twice the capacity of the current weighbridge arrangement) to provide greater operational flexibility. The weighbridges have been designed to operate either as 2 in 2 out or 3 in 1 out to provide additional operational flexibility as required. Further information has been added to Section 4.4 of ES Chapter 4.0 (Description of the Proposed Development) to reflect this.
37	Chirk Town Council	North Access Road - Can you confirm that the existing weighbridge would be decommissioned once the four new weighbridges are operational?	Weighbridge	Weighbridge	The intention is to decommission the existing weighbridge once the proposed weighbridge is operational.
38	Chirk Town Council	North Access Road - Concerns about traffic congestion between the existing roundabout at Whitehurst and the proposed new roundabout.	Traffic and Transport	Traffic Congestion	The Transport Assessment (TA), including the results of the junction assessments demonstrate that the new access road junction would operate well within capacity (see Table 7.2 of the TA) with very little in the way of queuing predicted.

Ref	Consultee	Comment / Response	Topic	Theme / Category	Applicant Response
39	Chirk Town Council	Lorry Park - The Council's major concern is around noise levels as this is currently a quiet country area. The noise from the arriving and departing HGV's and the disconnecting and forklift trucks will be 24/7 and residents in Lodgevale Park will be directly affected.	Noise and Vibration	Operational Site Noise	Receptor R1 (receptors off Wern and Offa) has been re-labelled (see ES Chapter 8 Noise and Vibration) to include reference to Lodgevale Park which is a suitable representative receptor position in this location given their close proximity to each other.  The assessment shows that there would be no significant impacts at all NSRs during the construction or operation of the Proposed Development following the implementation of appropriate mitigation.
40	Chirk Town Council	Lorry Park - The other major concern is in relation to the lighting of the lorry park – can you confirm if this would be floodlight? Again, this directly affects the residents of Lodgevale Park who are used to a dark sky in this area.	Lighting impacts	Lorry park lighting	The Lighting Assessment at Planning Statement Appendix D provides a description of the proposed lighting arrangement together with an assessment of its impact on nearby receptors. Anticipated light spill from the Proposed Development is illustrated at drawing SK-03 in the lighting assessment.
41	Chirk Town Council	Lorry Park - Can you provide a visual of how the barrier bund would look from Lodgevale Park?	LVIA	Lodgevale Park	The Illustrative Landscape Cross-Sections 01 and 02 (Figure 4.4a) illustrate how the bund would appear in section from properties at Wern (at the edge of Lodgevale). The photomontages from Viewpoint C (Figures 5.3a i-xii) illustrate the change in view from the same location.  Illustrative Landscape Cross-Section 03 (Figure 4.4a) has been extended eastwards to illustrate how the bund would appear from properties further east (on Offa/ Linden Avenue).
42	Chirk Town Council	Roundwood storage areas and associated structures - The Council has noise concerns – the current log stacks make a lot of noise and concern that these have been located closest to the residential area.	Noise and Vibration	Roundwood storage noise	ES Chapter 8 demonstrates that no significant noise and vibration impacts would be experienced at receptors closest to the proposed roundwood storage areas. Operational mitigation built into the proposed design includes a restriction stating that the log loader would not be used at the proposed lorry park and roundwood storage areas during night time periods (only between the hours of 07.00 and 19.00).
43	Chirk Town Council	Roundwood storage areas and associated structures - Consider another location for the storage area within the site.	Alternatives	Alternative site - roundwood storage	The proposed roundwood storage areas (together with the proposed 132kV substation and the proposed weighbridge building) have been carefully sited at the southwestern extent of the Proposed Development Site, close to the existing sewage treatment works to group the more prominent Proposed Development buildings and land uses with existing built infrastructure at the northern extent of the existing Kronospan Facility to minimise its visual impact.  Further information has been added to Section 3.2 of ES Chapter 3.0 (Alternatives) to reflect this.
44	Chirk Town Council	Roundwood storage areas and associated structures - The Council would like to express restrictions for use only between 8am – 8pm.	Noise and Vibration	Roundwood storage operating hours	ES Chapter 8 demonstrates that no significant noise and vibration impacts would be experienced at receptors closest to the proposed roundwood storage areas. Operational mitigation built into the proposed design includes a restriction stating that the log loader would not be used at the proposed lorry park and roundwood storage areas during night time periods (only between the hours of 07.00 and 19.00).
45	Chirk Town Council	The whole development site is on green belt land.	Green Belt	Green Belt	An analysis of the Proposed Development against the relevant parts of the Green Belt / Green Wedge policies is provided in the Planning Statement.

Ref	Consultee	Comment / Response	Topic	Theme / Category	Applicant Response
46	Chirk Town Council	Substation - The Council supports the move away from gas engines and the reduction of carbon emissions.	Carbon Emissions	Substation Carbon reduction	Noted
47	NRW	We have reviewed the FCA undertaken by SLR. Our advice to you is that the FCA fails to demonstrate that the risks and consequences of flooding can be managed to an acceptable level for the reasons explained below.	Flood Risk	Flood Risk	Noted - Refer to References 48 - 51 for further details.
48	NRW	<p>Section 8 of the FCA states that 'given the minimal area and that any variation to flood extent would be an increase to the applicant's own development land on the opposite side of the river it is not considered necessary to provide purpose built flood compensation storage.'</p> <p>However, we note that Afon Bradley Farm lies in close proximity to the proposed development and the Afon Bradley therefore we advise that further information should be provided to assess potential impacts on flood risk beyond the development site. Further hydraulic assessment should quantify the potential loss of flood storage and impact on flood flows which could cause impact to 3rd party property and assets, including the access road.</p> <p>The loss of flood storage will need to be quantified and any potential impacts on flood flow routes resulting from the development should be assessed. Any loss of flood storage resulting from the development should be compensated for, calculated on level for level basis for various return periods and this may require detailed modelling depending on the quantification of losses.</p>	Flood Risk	Hydraulic Assessment	Floodplain compensation calculations will be carried out post-submission (of the planning application) to determine the volume displaced based on existing NRW flood mapping. If required, compensation for loss of floodplain storage would be applied back to the floodplain on a level for level basis the western side of Afon Bradley as required. All land is within the ownership and control of Kronospan and would be achieved through minor earthworks.
49	NRW	Blockage scenarios and culvert capacity under the access road to Afon Bradley Farm and also the B5070 downstream should also be considered within the FCA.	Flood Risk	Blockage and Capacity	The Flood Consequence Assessment and Surface Water Drainage Strategy at Planning Statement Appendix B has been updated to provide detail of a designated high-level overflow from the southern wetland on the west side, adjacent to the Afon Bradley. This overflow will ensure any blockage of flows at the culvert to the northern wetland would route into the river. This mimics existing local hydrology and will not increase flood risk off site, including at the Afon Bradley Farm.
50	NRW	In summary, the FCA needs support of hydraulic modelling and quantification of flood storage losses and compensation to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development.	Flood Risk	Flood Risk	Floodplain compensation calculations will be carried out post-submission (of the planning application) to determine the volume displaced based on existing NRW flood mapping. If required, compensation for loss of floodplain storage would be applied back to the floodplain on a level for level basis the western side of Afon Bradley as required. The use of existing NRW flood extent mapping will negate the need for hydraulic modelling of the watercourse.
51	NRW	If no further information is submitted, or a revised FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we would object to this application when formally consulted by the Local Planning Authority.	Flood Risk	Flood Risk	Refer to References 48 - 50 for further details.
52	NRW	<p>We have concerns that a significant effect from the proposed development on the River Dee and Bala Lake SAC cannot be ruled out. The application is located approximately 1.4km upstream of the SAC.</p> <p>Further information should be provided to the Local Planning Authority to inform a Habitat Regulation Assessment (HRA) under regulation 63 of the Conservation of Habitats and Species Regulations 2017 prior to the determination of the planning application. The HRA should demonstrate that there will be no adverse effect on site integrity.</p>	Drainage and Pollution Prevention	River Dee and Lake Bala SAC - HRA	Noted - Refer to References 53 - 58 for further details.

Ref	Consultee	Comment / Response	Topic	Theme / Category	Applicant Response
53	NRW	<p>Further details regarding the surface water drainage treatment should be submitted as outlined below, specifically information relating to interceptors and separators to remove silts and chemicals prior to discharge into the Afon Bradley which subsequently enters the River Dee SAC. Guidance on interceptors is available via <a href="https://www.netregs.org.uk/media/1899/guidance-for-pollution-prevention-3-2022-update-v2.pdf">guidance-for-pollution-prevention-3-2022-update-v2.pdf</a> (netregs.org.uk)</p> <p><a href="https://www.netregs.org.uk/media/1899/guidance-for-pollution-prevention-3-2022-update-v2.pdf">chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.netregs.org.uk/media/1899/guidance-for-pollution-prevention-3-2022-update-v2.pdf</a></p>	Drainage and Pollution Prevention	River Dee and Lake Bala SAC - HRA	This will be covered as part of the detailed drainage design currently being prepared for SAB application. Outline details have now been added into Section 6 (Water Quality) of the Flood Consequence Assessment and Surface Water Drainage Strategy at Planning Statement Appendix B regarding the use of oil interceptors.
54	NRW	<p>The two proposed round wood storage areas are to be formed using permeable ground cover and not formally drained - a move that appears at odds with increased use of hard standing on site. The submitted information also states that substation platform would be constructed, where possible from permeable materials. The substation will contain hazardous substances to provide electrical insulation and cooling, therefore further information should be provided to the LPA to demonstrate that adequate safeguards would be in place to prevent loss of containment of hazardous substances to ground in the event of a substation incident. Justification would also need to be provided for not storing round wood on hardstanding in order to minimise the impact on soil and groundwater,</p>	Drainage and Pollution Prevention	River Dee and Lake Bala SAC - HRA	<p>The drainage strategy has been revised to include for the roundwood storage areas to be routed into the main drainage system.</p> <p>Commitments around the detailed design of the substation with areas of pollution risk maintained within bunded areas that would not drain away and be suitably disposed of if a spill occurred.</p>
55	NRW	<p>The proposed lorry park and car park areas would be constructed as a permeable sub-base and paving on a geo-cellular and geomembrane to provide a drainage layer that would drain surface water to the two northern attenuation basins. This surface water would then be discharged at a controlled rate into the Afon Bradley. It is stated that an oil interceptor would be installed as a precautionary measure prior to the point where the drainage would discharge into the proposed attenuation basins. Further information would be needed to demonstrate that adequate safeguards would be in place to minimise the loss of hydrocarbons etc., to the drainage layer and that provisions would be put in place for the priority off-loading of tankers of hazardous substances to avoid parking up (this applies to any loads of hazardous substances). Consideration also needs to be given to what remedial action would be carried out in the event of a loss of containment and proposed mitigation should be detailed in a full planning application. A soil / groundwater assessment 'baseline report' would also be need within a full planning application to enable any degradation over time to be detected.</p>	Drainage and Pollution Prevention	River Dee and Lake Bala SAC - HRA	<p>This will be covered as part of the detailed drainage design currently being prepared for SAB application.</p> <p>Drainage of all areas to SuDs to avoid groundwater contamination issues/concerns.</p> <p>Penstock controls will be implemented on both wetland outfalls - this is stated in the updated Flood Consequence Assessment and Surface Water Drainage Strategy at Planning Statement Appendix B.</p>
56	NRW	<p>We note the proposed application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. In line with our <a href="#">Planning Advice (July 2022)</a>, under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments. We therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.</p> <p><a href="https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-river-special-areas-of-conservation/?lang=en">https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-river-special-areas-of-conservation/?lang=en</a></p>	Foul Drainage	River Dee and Lake Bala SAC - HRA	<p>The Proposed Development will introduce new connections to the Kronospan foul sewer network for toilet and welfare facilities. The foul connection from Kronospan is to public sewer.</p> <p>The overall loading to sewer (once the Proposed Development is operational) will not increase as the Proposed Development is facilitating change to existing operations with no additional employees (i.e. any loading from the Proposed Development will result in a reduced load on the main site connection at the existing Kronospan Facility).</p>

Ref	Consultee	Comment / Response	Topic	Theme / Category	Applicant Response
57	NRW	We note from the information submitted that the development has the potential to increase the amount of phosphorus being discharged from the site. As such, we refer you to our Planning Advice and advise that you provide further information in support of any future planning application to be made. We note that no information has been submitted in respect of foul drainage arrangements for the proposed development. We advise you to seek further information as identified in the section titled 'What does this mean for development proposals involving connection to public wastewater treatment works' or 'What does this mean for development proposals involving private sewage treatment systems' of that advice.	Foul Drainage	River Dee and Lake Bala SAC - HRA	Refer to Reference 56.
58	NRW	The suitability of foul drainage arrangements for the proposed development is a matter for the LPA to determine. We therefore advise that as part of any future planning application submission, you provide the LPA with sufficient details of the proposed method of foul drainage to inform their Habitats Regulations Assessment (HRA) or to confirm whether or not any additional wastewater would be discharged from the site. If additional wastewater is to be discharged, it is likely the LPA will require further information from you to inform their HRA.	Foul Drainage	River Dee and Lake Bala SAC - HRA	Refer to Reference 56.
59	NRW	We consider the proposals have the potential to impact upon the River Dee SSSI. Providing the impact pathways referenced above for the SAC are adequately addressed, we consider the features of the SSSI will also be adequately safeguarded	Drainage and Pollution Prevention	River Dee SSSI	Noted - Refer to References 52 - 58 for further details.
60	NRW	We have considered the Environmental Statement, reference: 3046-01, October 2022, axis, submitted in support of the above application. We note that the report has not identified the grassland fungi (waxcaps) special feature of Chirk Castle and Parkland SSSI, and thus any assessment made may not have taken this feature into account. However, as the development boundary is over 960m from the Chirk Castle and Parkland SSSI we have no concerns over direct impacts on this feature of the SSSI.	Biodiversity	Chirk Castle and Parkland SSSI	Noted. Assessment has been updated to provide specific reference to waxcap fungi species feature of the SSSI.
61	NRW	Based on the information submitted, we consider that the proposed development is not likely to damage the features for which Chirk Castle and Parkland SSSI & Nant Y Belan and Prynella Woods SSSI are of special interest.  Modifications to the scheme as currently proposed may affect our view, and may merit a further consultation with us.	Biodiversity	Chirk Castle and Parkland SSSI and Nant Y Belan and Prynella Woods SSSI	Noted.
62	NRW	We have concerns regarding the proposed permeable drainage for the substation area as described within Section 4.2.10 of the Environmental Statement (Chapter 4), reference: 3046-01, October 2022, axis and the potential for hazardous substances at the substation to enter the ground through infiltration. As referenced in our protected sites section above, further information on adequate justification and safeguards would need to be demonstrated in any future planning application submitted to the Local Planning Authority.	Groundwater Protection	Substation - Hazardous Substances	Further details have been provided on oil interceptors within the updated Flood Consequence Assessment and Surface Water Drainage Strategy at Planning Statement Appendix B. ; however there would not be a significant hazardous spill risk. All unloading would be outside of the lorry park site boundary and lorries containing hazardous materials would not be parked within the lorry park for significant periods prior to unloading. Risks would not be increased from the existing Kronospan operations.

Ref	Consultee	Comment / Response	Topic	Theme / Category	Applicant Response
63	NRW	<p>The design and maintenance of storage and transmission facilities, such as tanks, lagoons and pipework, must be in such a way that hazardous substances are prevented from being released to the environment and the input of non-hazardous pollutants to groundwater is limited so as to not cause pollution. Natural Resources Wales expects operators to adopt appropriate engineering standards, taking into account the nature and volume of materials stored and the sensitivity of the groundwater. Where Natural Resources Wales judges there to be an unacceptable risk to groundwater from the storage of pollutants or their transmission through associated pipework or infiltration drainage, it will normally oppose such storage or transmission. If other material planning considerations determine that the development should proceed, Natural Resources Wales expects best available techniques (BAT) to be applied. Where storage already exists Natural Resources Wales will work with operators to assess and if necessary mitigate the risks to groundwater, with an aim to meet the objective set by this position statement. Re-use of existing facilities for new applications must be accompanied by a thorough assessment to demonstrate that the facilities are adequately designed and fit for purpose for the proposed new use, and that there will be no unacceptable input of pollutants to groundwater.</p> <p>Any design should bear section D of The Environment Agency's approach to groundwater protection February 2018 Version 1.2 The Environment Agency's approach to groundwater protection (<a href="https://publishing.service.gov.uk">publishing.service.gov.uk</a>)</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf">chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf</a></p>	Groundwater Protection	Substation - Hazardous Substances	Further details have been provided on oil interceptors within the updated Flood Consequence Assessment and Surface Water Drainage Strategy at Planning Statement Appendix B. ; however there would not be a significant hazardous spill risk. All unloading would be outside of the lorry park site boundary and lorries containing hazardous materials would not be parked within the lorry park for significant periods prior to unloading. Risks would not be increased from the existing Kronospan operations.
64	NRW	<p>Our comments relate to the potential effects of the proposed development upon the public's experience of the landscape character and tranquillity of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB).</p> <p>The proposal is for a new link road, 132kV substation, lorry park and roundwood storage areas in farmland located to the north of the existing Kronospan site. The site lies in the small valley below and to the east of the AONB. Chirk Castle Parkland and a section of Offa's Dyke national trail lies within the AONB here. Views from these publicly accessible locations extend over the valley. Views are rural with a strong pattern of trees. In places, housing development in Chirk is evident. The roofs of large shed like buildings, stacks and vapour plumes of Kronospan influence some views and their areas within the AONB that are unaffected by modern development.</p> <p>An important objective for the AONB (PPW11) is to conserve and enhance the public's experience of Natural Beauty and the area's special qualities. The AONB management Plan 2020- 2025 lists the landscape special qualities as: tranquillity, remoteness and wildness, space and freedom. Tranquillity is associated with an atmosphere of calm and stillness. Space and freedom are related to access to the landscape and the uninterrupted and extensive views from the high places within it.</p>	LVIA	AONB Context	Context noted.
65	NRW	The AONB management plan Special Qualities are referred to in section 5.4.18 of chapter 5.0 – landscape and visual effects. The report however does not provide a summary of development effects upon tranquillity.	LVIA	AONB Tranquillity	Further detail regarding the effects of the Proposed Development upon the AONB has been added to ES Chapter 5 Landscape and Visual Effects (Section 5.6). Specific consideration to effects on tranquillity is provided.
66	NRW	From our review of axis LVIA Chapter 5, viewpoint images and photomontage images, it is clear that viewpoints U and W within Chirk Parkland have a strong historic parkland character, high scenic quality and high tranquillity. Kronospan has no visual influence on these locations within the AONB.	LVIA	LVIA	Noted.

Ref	Consultee	Comment / Response	Topic	Theme / Category	Applicant Response
67	NRW	Photomontages U and W indicate that framed views to part of the proposed development would be possible. The area of the site visible includes the proposed 132kV substation and access road used by lorries. The size of the lorry park suggests vehicle movements would be high introducing activity and movement to views between gaps in parkland trees. Whilst activity is distant and occupies only a small segment of the landscape views, movement has the potential to attract attention. Attention would be drawn to commercial/industrial activity which we consider would be at odds with the tranquil quality of the parkland. This does not conserve and enhance the AONB.	LVIA	AONB Tranquillity	Further detail regarding the effects of the Proposed Development upon the AONB has been added to ES Chapter 5 Landscape and Visual Effects (Section 5.6). Specific consideration to effects on tranquillity is provided.
68	NRW	An indicative landscape scheme has been submitted. This proposes robust areas of woodland planting, specimen trees and hedgerows along the edges of the site and looks to address local landscape integration well. This however won't conceal the development within views U and W from the AONB.	LVIA	Landscape Masterplan	Noted.
69	NRW	We therefore have concerns with current proposals. Additional landscape mitigation measures should be developed in order to minimise adverse views from the AONB. We advise that you consider discussions with the owners of Chirk Castle Parkland with regard to offsite planting in order to explore closing up views of the proposed development from viewpoints U and W. The sequential views of people approaching and passing viewpoints U and W along permissive paths will need to be factored into the mitigation design.	LVIA	Off-Site Planting	Off-site landscape enhancement measures within the Kronospan landholding are illustrated on Figure 4.3b and described in ES Chapter 4.0 (Description of the Proposed Development) and in Section 5.8.  Further off-site enhancements on third party land will be identified in consultation with landowners.
70	NRW	The report confirms at 5.6.66 that lighting of the proposed development would accord with ILP criteria for Environmental Zone E0, i.e. for 'dark sky' areas. We therefore have no issues with night-time lighting effects upon the AONB's dark skies and night-time character. Detailed proposals would need to be submitted in due course to demonstrate accordance with this statement.	LVIA	Lighting Impacts	The proposed lighting scheme (including details of column heights and luminaires) is described and assessed in the Lighting Assessment (Planning Statement Appendix D). The conclusions made in the LVIA are based upon the conclusions of the Lighting Assessment.
71	NRW	We consider that there is insufficient information submitted with this statutory pre-application consultation to determine the likely impacts of the proposals on Great Crested Newt. We advise that further surveys are undertaken as detailed below.	Biodiversity	Great Crested Newts	Assessment and baseline information updated to include waterbodies within 500m of the Proposed Development. No additional survey deemed necessary.
72	NRW	We note Appendix 7.3 'Great Crested Newt Presence or Absence (eDNA) Survey Report', details four lagoons (P1-P4), located within 250m of the Proposed Development, were subject to eDNA survey. However, it is also noted that 'Waterbodies in the wider area were not accessed at the time of the Great Crested Newt surveys'. The Environmental Statement would therefore benefit from clarity as to the number of other waterbodies in the area and their proximity to the development site. Should additional waterbodies be present within 500m of the development site, we would advise that these are also subject to survey for Great Crested Newt (GCN), prior to submission of the formal planning application.	Biodiversity	Great Crested Newts	Assessment and baseline information updated to include waterbodies within 500m of the Proposed Development. No additional survey deemed necessary.
73	NRW	Together with the additional survey information indicated above, should GCN be confirmed, species report submissions should include a detailed assessment of the likely impacts of the proposals and full details of avoidance and/or mitigation measures that will be put in place to offset the anticipated impacts. There should be clarity on their scale, location and nature of mitigation areas and set out how these areas will be secured and managed in the long term, including any financial arrangements to ensure delivery of their management.	Biodiversity	Great Crested Newts	Assessment and baseline information updated to include waterbodies within 500m of the Proposed Development. No additional survey deemed necessary.
74	NRW	The above information is required to prior to the determination of any planning application in order to ensure that there will be no detriment to the maintenance of the favourable conservation status of Great Crested Newt.	Biodiversity	Great Crested Newts	Noted - Refer to References 71 - 73 for further details.
75	NRW	The development site is located within 960m of the Chirk Castle and Parkland SSSI, Lesser Horseshoe Bats are a feature of the protected site.  We advise that the proposed development is not likely to harm or disturb the bats or their breeding sites and resting places, the potential impact pathway from proposed lighting is adequately addressed through the Environmental Statement.	Biodiversity	Bats	Noted.

Ref	Consultee	Comment / Response	Topic	Theme / Category	Applicant Response
76	NRW	We note the Air Quality Assessment, September 2022, Smith Grant Environmental Consultancy LLP, submitted in support of the proposed development and have no concerns to raise in relation to potential impacts on air quality.	Air Quality	Air Quality	Noted
77	Wales and West Utilities	<p>As there is high pressure gas main present, a site visit will be required for this location. Can you please provide the following information, at least 10 working days before your works are due to commence, so we can establish whether or not a site visit is necessary;</p> <ul style="list-style-type: none"> <li>• A plan showing the exact location and extent of your works along with a full site address</li> <li>• An overview of the works taking place</li> <li>• Site contact details</li> <li>• The date that your works are set to commence</li> <li>• A copy of your Risk Assessment and Method Statement (RAMS), if you are planning any excavation within the vicinity of our pipeline</li> </ul>	Gas Main	Gas Main	Kronospan will liaise direct with Wales and West Utilities prior to the commencement of construction works.
78	HSE	Automated response received directing the applicant to the Web App ( <a href="https://pa.hsl.gov.uk/">https://pa.hsl.gov.uk/</a> ) to understand whether the HSE 'advises against' or 'doesn't advise against' the proposed development due to its location within the consultation zone for Kronospan major hazard site.	Consultation Zone	Consultation Zone	The Applicant, as the owner and operator of the Kronospan facility, ensures that all operations are undertaken in accordance with the relevant HSE regulations and legislation. The Proposed Development would not form a health and safety risk to the wider Kronospan facility and vice versa.

**APPENDIX I**

**APPLICANT RESPONSES TO COMMUNITY CONSULTEES RESPONSES**

Ref	Comment / Response	Beneficial or Adverse	Number of Responses Cited	Additional Comments / Suggestions	Applicant Response
A	The proposed would result in the loss of green space in and around the village of Chirk	Adverse	1		<p>The Proposed Development Site is on undeveloped land adjacent the existing Kronospan Facility. The Site is allocated as Green Wedge in the Wrexham Unitary Development Plan - an appraisal of the Proposed Development against national policy and local plan policy approach for Green Wedge/Barrier is provided in the Planning Statement.</p> <p>The Proposed Development Site is not designated as open space and the landscape of the Site does not have any such features, characteristics or qualities that require extra protection (as demonstrated by the findings of the Council's Special Landscape Areas Study).</p>
B	Any new access road should be for the purpose of an access road	Adverse	1		The justification for the lorry park, 132kV substation and roundwood storage areas, together with the proposed access road is provided in ES Chapter 3.0 (Alternatives) and ES Chapter 4.0 (Description of the Proposed Development).
C	Environmental impacts from dust	Adverse	16		<p>The Air Quality Assessment has considered the potential impacts associated with fugitive dust and vehicle exhaust emissions during the construction and operational phases of the Proposed Development.</p> <p>No unacceptable impacts on existing or future human health, amenity or ecological receptors have been identified to arise from the Proposed Development.</p> <p>Beneficial effects with respect to air quality are anticipated due to the HGV traffic no longer travelling past the residential areas down the B5070.</p>
D	Increase in noise impacts from the facility and lorries (including during the evening and bringing noise closer to homes)	Adverse	36		<p>A Noise and Vibration assessment has been undertaken of the Proposed Development. The assessment shows that there would be no significant impacts during the construction or operation of the Proposed Development following the implementation of appropriate mitigation.</p> <p>The introduction of the lorry park results in HGVs being able to avoid the need to travel through part of Chirk town centre and the assessment shows that road traffic noise levels would be perceptibly reduced for those receptors nearest to the existing entrance and north of the entrance off Holyhead Road. The Proposed Development therefore provides a beneficial effect with respect to noise.</p>
E	Increase in odours	Adverse	10		Refer to Reference Y below.
F	Increase in light pollution	Adverse	7		Lighting proposals are designed in accordance with current good practice and would ensure that any spillage of obtrusive light outside of the Site boundary would be minimised. The lighting assessment demonstrates that the Proposed Development would be compliant with residential receptor criteria, 'sky glow' criteria, and light spill criteria for particularly light sensitive bats undertaking commuting and foraging activities. Mitigation, including but not limited to luminaries with no upward lighting, careful selection, aiming and positioning of luminaries, use of low intensity LED modules, and minimising the task illuminance level.
G	Visual impacts from new development	Adverse	11	Provide bunding / planting around the development to help screen views and noise. Utilise a flat roof on the weighbridge building rather than pitched.	<p>A Landscape and Visual Impact Assessment has been undertaken of the Proposed Development. Significant visual effects would occur at only one of the 20 Viewpoints included in the LVIA, and this effect would occur in the short-term only. This significant effect would occur from a Viewpoint on the B5070 close to the location of the proposed new roundabout and would occur due to the changes to the highway corridor and loss of nearby tree cover. As new planting establishes, the intensity of the effects would reduce to non-significant levels.</p> <p>The flat roof would be more expensive and require more maintenance than a pitched roof and would have any influence on its visual impact from a LVIA perspective.</p>
H	Impact on the World Heritage Site	Adverse	10		An assessment of the proposed Development on the historic environment has been undertaken; the level of effect after the implementation of mitigation has been assessed as Slight/Moderate as the WHS Buffer Zone will be physically impacted by the Proposed Development.

Ref	Comment / Response	Beneficial or Adverse	Number of Responses Cited	Additional Comments / Suggestions	Applicant Response
I	Impact on tourism of Chirk	Adverse	5		<p>No assessment has been undertaken of the impact on tourism as the potential for significant effects was scoped out; The Council has not requested such an assessment be provided for in its formal response to the request for pre-application advice submitted by the Applicant in 2020 and 2021. Impacts on the sense of arrival into the World Heritage Site are provided in the Heritage Impact Assessment (Appendix 6.3 and ES Chapter 6.0 (Historic Environment)).</p> <p>The principle of the Proposed Development is that it would be a benefit to the residents of Chirk by removing Kronospan HGV traffic from Holyhead Road which would have overall amenity benefits for local residents, improving on-site HGV parking provision and overall efficiency of ongoing operations. This would also have benefits for tourism by reducing the current impacts of Kronospan HGV movements.</p>
J	Impact on the Green Belt	Adverse	14		Please refer to Reference A above.
K	Impact on human health from dust	Adverse	13		Please refer to Reference C above.
L	Impact on human health from noise	Adverse	3		Please refer to Reference D above.
M	No offset to negative environmental impacts	Adverse	1		<p>Many of the mitigation measures have been embedded into the Proposed Development because of decisions made during the design of the scheme, and hence form part of the scheme for which planning permission is being sought; this includes the proposed landscaping scheme (Figure 4.3a) as well as other embedded mitigation measures identified in ES Chapters 5.0 - 8.0. In addition, further mitigation has been identified to further prevent, reduce, or offset adverse effects unavoidable by design; this includes noise walls, and certain restrictions for day-time working associated with roundwood storage works as well as other mitigation measures identified in ES Chapters 5.0 - 8.0. Kronospan has committed to enhancements including off-site planting (see Figure 4.3b) and a heritage fund for localised benefits which will be discussed further with relevant stakeholders and secured and delivered via Section 106 agreement.</p>
N	Scale of development inappropriate	Adverse	13		<p>Noted. The proposed location of the Proposed Development immediately adjacent the unitary development plan settlement limit/employment area (and the existing Kronospan Facility) would mean that it would be seen as a logical extension to the settlement limit/employment area. A Landscape and Visual Impact Assessment has been undertaken of the Proposed Development. No significant long-term visual effects would occur as the proposed landscape planting establishes. Please also refer to Reference G above.</p>
O	Other developments in the town have been refused due to not being in keeping with landscape	Adverse	3		Noted.
P	Increase in traffic	Adverse	8	Make use of railway to import wood rather than by road	<p>The principle of the Proposed Development is that it would be a benefit to the residents of Chirk by removing Kronospan HGV traffic from Holyhead Road which would have overall amenity benefits for local residents, improving on-site HGV parking provision and overall efficiency of ongoing operations. A Transport Assessment has been undertaken to demonstrate that there would be no increase in HGV traffic and that the capacity of the proposed roundabout and access road, and the surrounding highway network is sufficient.</p> <p>Kronospan has reduced their reliance on road transport by investing in improved rail sidings and thereby allowing more roundwood to be delivered to Site by train. However, the extent to which the use of rail can be increased in the future is limited by capacity issues on the local rail network. Some of the investments being made at Kronospan will also help reduce vehicle movements through more efficient product handling e.g. development of the raw board and paper warehouse. However, despite such initiatives there will be a continued requirement for transport of raw material and manufactured goods via road.</p>
Q	Loss of wildlife	Adverse	3		<p>An assessment of the impact on biodiversity and nature conservation has been undertaken; this demonstrates that the Site has relatively low ecological value and that significant effects would be unlikely to arise. There would be minor beneficial effects for notable and priority habitats, on-site habitats, birds, and bats once newly created habitats via the Illustrative Landscape Masterplan are established.</p>

Ref	Comment / Response	Beneficial or Adverse	Number of Responses Cited	Additional Comments / Suggestions	Applicant Response
R	Impact on Special Landscape Area around Chirk	Adverse	6		<p>The Proposed Development would be well enclosed by proposed planting and by the proposed earth bund along the eastern perimeter. This would greatly restrict the influence that it would have outside of the Site boundary, including from within the remainder of the designation. In the wider context, the landscape of the SLA would undergo little change. The Site and its surroundings do not fall within the revised SLA boundary proposed as part of the emerging Local Development Plan.</p> <p>The landscape of the Site does not have any such features, characteristics or qualities that require extra protection (as demonstrated by the findings of the Council's Special Landscape Areas Study).</p>
S	Why is the substation necessary to deliver the road / lorry park	Adverse	4		<p>The proposed 132kV substation is not required to deliver the proposed access road/lorry park. However, the proposed substation would provide several benefits to Kronospan and the local community which are summarised in the Planning Statement - see also Reference T below.</p>
T	Pollution and carbon emissions / climate change impacts	Adverse	14		<p>The principle of the Proposed Development is that it would be a benefit to the residents of Chirk by removing Kronospan HGV traffic from Holyhead Road which would have overall amenity benefits for local residents:</p> <ul style="list-style-type: none"> <li>- reduced noise impacts;</li> <li>- improvements in air quality resulting from reduced exposure to vehicle emissions;</li> <li>- reduction in direct dust/particulates associated with deposits/emissions from HGVs</li> <li>- reduction in indirect dust/particulates mobilised by HGVs passing receptors.</li> </ul> <p>The proposed 132kV substation brings with it several benefits to the local community by reducing the demand on the local network, mitigating the potential for local network failure, improved reliability for other businesses and community facilities and enhancing the opportunity for EV charging and provision of local renewable energy in Chirk. A separate and dependable power supply on the Site would improve its operational efficiency, reduce the current dependence on the onsite fossil fuel-based generation facilities and enable the deployment of renewable technologies.</p>
U	Development is outside existing settlement boundary	Adverse	1		<p>The Proposed Development would require development outside of the existing settlement limit/employment area. The relative density of the existing Kronospan Facility and the presence and nature of the immediate surrounds means that the land to the north of the existing Kronospan Facility is the only practicable location for the Proposed Development. It is only by using the land to the north that the intended benefits of diverting HGV movements away from the main settlement would be realised. The proposed location of the Proposed Development immediately adjacent the settlement limit/employment area (and the existing Kronospan Facility) would mean that it would be seen as a logical extension to the settlement limit/employment area.</p>
V	Impact on property values	Adverse	6		<p>Effects on property prices is not a material planning consideration.</p>
W	Road Safety	Adverse	5		<p>There are no records of safety incidents on Holyhead Road relating to Kronospan traffic; it is well recognised that HGVs traffic has perceived and actual impacts on pedestrians and cyclists. Reducing the number of HGVs on the residential stretch of Holyhead Road would improve pedestrian and cyclist enjoyment and may encourage greater use by virtue of a perceived reduction in safety concerns.</p>
X	Benefits of reducing the number of lorries on the main road	Beneficial	86		<p>The principle of the Proposed Development is that it would be a benefit to the residents of Chirk by removing Kronospan HGV traffic from Holyhead Road which would have overall amenity benefits for local residents, improving on-site HGV parking provision and overall efficiency of ongoing operations. A Transport Assessment has been undertaken to demonstrate that there would be no increase in HGV traffic and that the capacity of the proposed roundabout and access road and the surrounding highway network is sufficient.</p>

Ref	Comment / Response	Beneficial or Adverse	Number of Responses Cited	Additional Comments / Suggestions	Applicant Response
Y	Benefits through job protection / future creation	Beneficial	10		<p>Noted - the Proposed Development would not result in direct creation of additional jobs or result in additional activity; however, it is a significant objective of Vision 2025 and its ambitions to deliver a profitable and growing business, and reduce impact and support UK net zero targets.</p> <p>The Proposed Development would ensure the business can continue to meet customer demands in a competitive manufacturing environment, as well as delivering numerous environmental and social benefits. This investment would help to safeguard the significant direct and indirect employment opportunities supported by the business and the wider local and regional economic benefits which result from a major manufacturing business such as Kronospan.</p>
Z	Reduce HGVs parking on the road network	Beneficial	2		<p>Noted - for inbound timber deliveries (which are managed via time slots - all other operations are managed by a shunting operation on-site - see Section 3.2 of ES Chapter 3.0 (Alternatives) for further details), wider delivery slots would be able to be created due to improved HGV parking facilities on the proposed lorry park which would help to reduce congestion of existing parking areas on the local trunk road network.</p>
AA	Improve energy security (132kV substation)	Beneficial	1		<p>Noted - Refer to Reference T above.</p>
BB	Landscaping would minimise visual impacts	Beneficial	1		<p>Noted - Refer to References G and M above.</p>
CC	General support for Proposed Development	Beneficial	1		<p>Noted.</p>
DD	No impact on ecology/wetlands would enhance biodiversity	Beneficial	2		<p>Noted - Refer to Reference Q above. The drainage scheme has been designed with biodiversity interests in mind in addition to the drainage function and would be managed to create a seasonally wet wetland habitat.</p>