

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.

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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

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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	<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>
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	<p>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).</p> <p>Further off-site enhancements on third party land will be identified in consultation with landowners.</p>
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	<p>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.</p> <p>The suggested scope of the heritage fund is set out in ES Chapter 6 Historic Environment (Section 6.8).</p>
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	<p>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.</p> <p>No change to the Illustrative Landscape Masterplan (Figure 4.3a) is required.</p>

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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	<p>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.</p> <p>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.</p>
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	<p>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.</p> <p>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.</p>	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.

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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>



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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.

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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	<p>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.</p> <p>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.</p>
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	<p>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.</p> <p>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).</p>
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	<p>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.</p> <p>Further information has been added to Section 3.2 of ES Chapter 3.0 (Alternatives) to reflect this.</p>
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.

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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 guidance-for-pollution-prevention-3-2022-update-v2.pdf (netregs.org.uk)</p> <p><a href="chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/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	<p>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.</p>
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>

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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.

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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 (publishing.service.gov.uk)</p> <p><a href="https://efaidnbmnnnibpcajpcglclefindmkaj/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.

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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.

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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.