

Bobby Clayton  
Axis

Sent by email

Eich cyfeirnod  
Your reference

3046-01/BC

Ein cyfeirnod  
Our referenceDyddiad  
Date

10 November 2022

Llinell uniongyrchol  
Direct line

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Ebost  
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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.

AssessmentScheduled 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.