

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

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