



# **CAS-03463-R2W9C2 - Kronospan Low Carbon CHP Facility**

## **Environmental Statement**

### **Vol2: Chapter 1.0 – Introduction**

Prepared for



December 2025  
DNS5-2-001



# Document Control

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## 1.0 INTRODUCTION

### 1.1 Introduction

- 1.1.1 This Environmental Statement (ES) is submitted in support of a Development of National Significance (DNS) application, under Section 62D of the Town and Country Planning Act 1990 (TCPA)<sup>1</sup>. The application has been made by Kronospan Limited ('the Applicant') for a Low Carbon Combined Heat and Power (CHP) Facility with the capacity to generate up to 40 megawatts (MW) of renewable electricity and 125 MW of renewable thermal energy for use in the existing manufacturing processes and associated infrastructure ('the Proposed Development') at the existing Kronospan Facility, Chirk, Wrexham, North Wales, LL14 5NT.
- 1.1.2 The proposed Low Carbon CHP Facility would process up to 293,000 tonnes per annum (TPA) of waste wood and forestry residues as feedstock for the existing Kronospan Facility.
- 1.1.3 Based on the likely availability of feedstock that can be generated on-site (based on an average taken from the calendar years 2021, 2022, and 2023), the proposed (on-site) feedstock configuration for the proposed Low Carbon CHP Facility would be as follows:
- Existing on-site process residues currently sold off-site – 76,991 TPA.
  - Diverted fuel from the existing K7 Biomass Plant - 74,667 TPA.
  - Other on-site process residues – 108,455 TPA.
  - **Total feedstock generated on-site = 260,113 TPA.**
- 1.1.4 There would be a 'remainder' of 32,887 TPA of biomass feedstock required; this is based on attaining the maximum throughput of the proposed Low Carbon CHP Facility of 293,000 TPA.
- 1.1.5 The feedstock 'remainder' would be made up as follows:
- 50% (16,444 TPA) - **The import of forestry brash** for direct use in the proposed Low Carbon CHP Facility.

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<sup>1</sup> Town and Country Planning Act 1990, Section 62D, amended by the Planning (Wales) Act 2015 Section 19



- 25% (8,222 TPA) - **The import of Grade C waste wood\*** for direct use in the proposed Low Carbon CHP Facility.
- 25% (8,222 TPA) - **Increased on-site production** that would generate further on-site process residues for direct use in the proposed Low Carbon CHP Facility.

- 1.1.6 \*Grade C wood is a mix of waste wood, including panel products and wood treated with preservatives. Whilst not suitable for traditional recycling, it can be used in biomass fuel applications.
- 1.1.7 The feedstock ‘remainder’ scenario set out above is considered feasible and reasonable and forms the basis of the feedstock assumptions considered as part of the ES. However, the Applicant would retain the flexibility to apply different percentages to the above depending on the actual feedstock ‘remainder’ in any given year and the availability/market conditions of the different types of feedstock. Increasing on-site production (to generate further on-site process residues) would likely be the Applicant’s priority given this would be more sustainable, more cost effective, and could occur under their existing manufacturing conditions and existing Environmental Permit restrictions.
- 1.1.8 The feedstock ‘remainder’ scenario set out above would increase the feedstock that could be generated on-site from 88.8% (260,113 TPA) to 91.6% (268,335 TPA). As stated above, depending on market factors and material available on site, there is the potential for 100% of the feedstock to be generated on-site.
- 1.1.9 The location of the Proposed Development Site is shown at **Figure 1.1** and the drawing provided at **DNS3-001**. The design of the Proposed Development is provided on the DNS Drawings at **DNS3-002 – DNS3-011** which provides details of approximate dimensions of the key components and how the Proposed Development would be integrated into the other existing site operations.
- 1.1.10 A detailed description of the Proposed Development (including proposed feedstock configuration) is provided at **ES Chapter 4.0 (Description of the Proposed Development)**.
- 1.1.11 The ES has been prepared in accordance with The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 [SI 2017 No. 567 (W.136)] (‘the EIA Regulations’). It assesses the likely significant environmental

effects (based on a reasonable worst-case approach) of the Proposed Development during the construction, operation, and decommissioning phases.

1.1.12 This chapter sets out the following:

- A summary description of the Proposed Development.
- A description of the Applicant.
- A description of the Site and surroundings.
- A summary of the consenting process.
- A summary of the consultation process.
- An overview of the EIA Regulations and its core requirements.
- An overview of the ES structure and compliance with the core EIA requirements.
- An overview of the expert organisations that have undertaken the EIA.

## **1.2 The Applicant**

- 1.2.1 The Applicant is Kronospan Limited. Kronospan has been operating for 55 years (manufacturing for 52 years) at its site in Chirk, Wales. It is the world's leading manufacturer of wood-based panels using advanced technology and has pioneered many of the industry's key advances. The products produced have a wide application across the flooring, furniture, and refurbishment industries.
- 1.2.2 Kronospan is the UK's leading manufacturer of high-quality wood-based panels and associated products and has been operating in the UK since 1970, and the operation in Chirk was the first outside of Austria. The primary products manufactured by Kronospan at the Chirk site are Particleboard (PB) and Medium Density Fibreboard (MDF), from which several secondary products are produced such as laminate flooring, worktops and melamine faced boards.
- 1.2.3 The Kronospan manufacturing facility is a major local employer within Wrexham County Borough Council (WCBC) with the site at Chirk employing over 600 staff. It is estimated that the existing Kronospan Facility also provides indirect employment to 6,000 people in industries relating to the manufacturing and supply chains associated with the operations at the site.



- 1.2.4 Kronospan is committed to reducing carbon as part of its operations and is a critical aspect of its long-term sustainability goals. An extract from the Kronospan Environmental, Social and Governance Report 2022-2023 is provided below.

*“Attaining carbon-negative production is one of our key goals and reflects our commitment to environmental responsibility. Businesses have fundamental responsibilities towards our planet and are increasingly called upon to reduce carbon emissions in their production processes. Recent research shows the significance of responsible forest management. Forests can be utilised as a natural and effective form of carbon storage. Furthermore, through the utilisation of end-of-life post-consumer timber as a raw material, compounded carbon absorption and storage can be achieved through a combination of sustainable forestry and efficient recycling practices. By utilising wood over energy-intensive materials, such as concrete and plastic, we can effectively limit emissions resulting from fossil fuels.*

*At Kronospan UK, we utilise wood-based products as raw materials, prolonging the period of carbon storage. In essence, Kronospan products function as material reservoirs of CO<sub>2</sub>. For a comprehensive understanding of our product-based circular approach aimed at achieving carbon-negative production, please refer to “We Aim for Carbon-Negative Production.*

*Recognising our presence in an energy-intensive industry, we understand the substantial energy requirements inherent to the production of wood-based panel products. The preparation of raw material involves processes such as breaking down and bonding timber fibres using significant heat and electricity. To fulfil our dedication to addressing climate change, we consistently channel significant investment into the development and enhancement of technologies aimed at increasing production efficiency, whilst reducing emissions.*

*We believe continuous efforts will positively impact our sustainability journey. At Kronospan UK, we believe that harnessing renewable energy from end-of-life timber lies at the core of our business model, driving our continued commitment to combat climate change.”*



## 1.3 The Site and Surroundings

### *The Existing Kronospan Facility*

- 1.3.1 The entirety of the existing Kronospan Facility covers an area of approximately 40 hectares (ha), with approximately 14ha of this developed with industrial buildings and plant. Several industrial process facilities are in the western half of the existing Kronospan Facility which are used to process, sort and dry the raw wood materials used in the manufacture of MDF and PB. These include several tall structures, including stacks, that emit abated process emissions to the atmosphere. The tallest structures within the existing Kronospan Facility are the biomass plant stack which is 70m in height, the SEKA wet electrostatic precipitator (WESP) filter which has a stack height of 65.5m and stack width of approximately 5m, the MDF cyclones (57m high), and the dryer exhaust stack at the WESP Chip Dryer (50m high).
- 1.3.2 Several process buildings are in the northern half of the existing Kronospan Facility including: a sawmill, formalin plant and the secondary product manufacturing facility (*Kronoplus*) which produces laminate flooring and worktops.
- 1.3.3 The development of the existing Kronospan Facility is ongoing, reflecting changes in industrial processes and in market conditions. Planning permission has been granted for the following developments which are either recently completed, under construction, or planned to be constructed in the near future:
- An oriented strand board (OSB) Facility (granted 14 August 2019 under appeal reference APP/H6955/A/19/3227571) at the western extent of the existing Kronospan Facility; the OSB Facility is currently under construction.
  - A new warehouse building (granted 13 April 2022 under planning reference P/2021/0725) in the north-east part of the existing Kronospan Facility, which will deliver 15,029 sq.m. of floorspace (GEA). This planning permission also includes a new sprinkler tank between the northern extent of *Kronoplus* and the existing Kronospan Facility's northern boundary.
  - An extension to the existing main warehouse building to create a covered loading yard and storage area to facilitate site operations (granted 04 July 2022 under planning reference P/2022/0336).



- The erection of a new building to form engineering stores, a dedicated apprentice workshop, an access track around the new structure and ancillary works (granted 07 November 2022 under planning reference P/2022/0615).
- The erection of two raw material silos, extension to the existing chip preparation building, and the erection of three silos and associated works (granted 09 January 2023 under planning reference P/2022/0765).
- A proposed new access road (North Access Road), lorry park, weighbridge, 132kV substation and associated infrastructure on land immediately north of the existing Kronospan Facility (Decision Notice is pending (under planning reference P/2022/1080) subject to confirmation of legal agreements for off-site enhancements).

1.3.4 A draft planning application for a proposed 132kV electrical connection via underground cables between the existing Legacy to Oswestry 132kV overhead line and the proposed Kronospan 132kV substation (the latter included in planning permission P/2022/1080 referenced above) is currently subject to statutory pre-application consultation; the planning application is expected to be submitted to WCBC in Q1 2026.

1.3.5 Surface water for most of the manufacturing site currently drains to two lagoons on the northern boundary of the manufacturing facility, each of 2,033sqm in volume. A third lagoon was constructed to take surface water from the log yard.

1.3.6 An overview of the Proposed Development Site and existing site operations is provided at **Figure 1.2**.

### ***The Proposed Development Site***

1.3.7 The Proposed Development Site (see the drawing provided at **DNS3-001**) is at the south-western extent of the existing Kronospan Facility which is predominately characterised by substantial built development. The Site is currently hardstanding and is on the footprint of the existing Gas Turbines 1 and 2. The existing Gas Engines 1 – 3, existing biomass plant stack, existing SEKA WESP filter and the existing dryer exhaust stack at the WESP Chip Dryer are immediately adjacent or very close to the Site. The existing MDF cyclones are approximately 150m to the south of the Site. Existing open wood storage is predominately to the north of the Site.



- 1.3.8 Several existing components would be required to be removed entirely, removed and relocated, and removed and replaced with new; the most notable such component is the existing Gas Turbines 1 and 2 which would be decommissioned and removed (as an inherent part of the Proposed Development and attaining the core objective of decarbonisation). All such components are shown on the drawings provided at **DNS3-002** and **DNS3-003** and described in further detail at **Sections 4.13 – 4.16, ES Chapter 4.0 (Description of the Proposed Development)**.

#### ***Wider Site Context***

- 1.3.9 Chirk is a small town off the A5 and just north of the England-Wales border (within Wales). The residential areas of the town mostly lie east of the B5070, with the existing Kronospan Facility to the west of this road. On the western side of the B5070, to the south-east of the existing Kronospan Facility is an area of greenspace comprising a private sports club (immediately south of the Kronospan car park) and Chirk Recreation Ground. The larger structures within the existing Kronospan Facility are visible from the recreation ground, but other structures are very well screened from view by intervening vegetation cover. Chirk town centre lies south-east of the existing Kronospan Facility and includes various commercial and community buildings and areas of public open space.
- 1.3.10 The wider area is rural. The landform falls steeply, from the hills to the west towards the much lower-lying Shropshire Plain to the east. Local variations in topography are evident, with a marked rise to a ridge east of the town.
- 1.3.11 The western perimeter of the existing Kronospan Facility is formed by the Shrewsbury to Chester railway. Further west, the land rises towards the foothills of the Welsh mountains. The Llangollen Canal forms part of the Pontcysyllte Aqueduct and Canal World Heritage Site (WHS). In addition to recognised heritage value, the canal corridor is an important recreational route; water is also abstracted from the canal for use in the Applicant's manufacturing process. Beyond the canal, settlement is sparse, and land cover comprises a mixture of pasture and small woodlands. Chirk Castle and its associated grounds (Grade 1 registered) are a notable feature within the landscape. The Castle is owned by the National Trust and is a well-known and well-frequented visitor destination. The Offa's Dyke Path National Trail runs in a broadly north-south direction further to the west, with views available east over the

lower ground. Much of this area falls with the boundary of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB).

- 1.3.12 A sewerage pumping station and one property, owned by the Applicant, are to the immediate north of the existing Kronospan Facility; immediately north of this is the site of the proposed North Access Road and associated development referred to above. Further north, the land undulates before falling into the steep valley of the River Dee approximately 1.6km north of the existing Kronospan Facility. The canal (WHS) runs due north before turning westwards along the southern lip of the valley. The northern side of the valley is urbanised, with a string of contiguous small villages at Cefn.
- 1.3.13 The eastern perimeter of the existing Kronospan Facility is formed by Holyhead Road (B5070). An earth bund, planted with trees, has been developed along the eastern perimeter of the existing Kronospan Facility to reduce the visibility of Kronospan operations from neighbouring properties on Holyhead Road (B5070). An undulating agricultural landscape extends east of Chirk. The A5 corridor runs north-south in what is almost a straight line along the eastern edge of a ridge approximately 1km east of the existing Kronospan Facility. The Brynkinallt estate (Registered Park and Garden) is bisected by the road. The wholly separate Brynkinallt Park lies west of the road, at the eastern edge of Chirk, on reclaimed colliery land.
- 1.3.14 To the immediate south of the existing Kronospan Facility is the Mondelez International factory, the Chirk AAA sports ground and the Chirk recreational ground. Further south, the steep sided valley of the River Ceiriog cuts through the surrounding hills 1.8km to the south of the existing Kronospan Facility. Parts of the valley slopes are well wooded. The Llangollen Canal crosses the valley via the Chirk Aqueduct, which forms part of the WHS. The Ceiriog Trail recreational route runs along the southern lip of the valley.

### ***Previous Landscape Strategy***

- 1.3.15 A condition was attached to several planning permissions for development at Kronospan which required the development of a landscape strategy to mitigate the visual impact of the wider Kronospan site from public viewpoints. As such, the Applicant submitted a landscape strategy for the area surrounding the wider

Kronospan site to WCBC in 2017. The landscape strategy was approved in 2019, and planting has subsequently been carried out within land owned by the Applicant.

- 1.3.16 Further on-site and off-site planting will be undertaken (some planting has already been implemented, other planting will be undertaken in the near future) in relation to the planning permissions for the warehouse building, the engineering stores, and North Access Road.

## 1.4 The Consenting Process

- 1.4.1 The proposed Low Carbon CHP Facility constitutes an energy ‘generating station’. Given that the proposed Low Carbon CHP Facility has an installed generating capacity between 10 MW and 50 MW, it represents a DNS under regulation 3(1)(a) of the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016. As such the application is submitted to Planning and Environment Decisions Wales (PEDW) and determined directly by the Welsh Government.

- 1.4.2 It is recognised that other consents/licences may be required for the construction, operation, and decommissioning of the Proposed Development. At the time of submission, it has been identified that the following would be required:

- Variation to the existing Environmental Permit.
- Appropriate waste management licences as required during construction works.

- 1.4.3 The above consents are separate to the DNS process and are subsequently not included as part of the DNS application.

## 1.5 Consultation

### *Overview*

- 1.5.1 A summary of the consultation undertaken throughout the design development and assessment of the Proposed Development is provided below. Further detail is provided in the Pre-Application Consultation (PAC) Report (**DNS4-009**) which accompanies this DNS application. **THIS PARAGRAPH IS A PLACEHOLDER AND WILL BE FINALISED UPON COMPLETION OF PRE-APPLICATION CONSULTATION – THE PAC REPORT IS NOT YET AVAILABLE.**



- 1.5.2 It should be noted that, at the outset of this project, the proposed feedstock for the proposed Low Carbon CHP Facility consisted of up to 30,000 TPA of Refuse Derived Fuel (RDF) and/or Forestry Residues and significantly more feedstock to be imported to Site (than the current approach as part of this DNS application). Following the pre-application advice process and receipt of PEDW's first Scoping Direction on 31 July 2024 (summarised below), the proposed feedstock configuration was revised to remove RDF and use a significantly greater quantity of on-site process residues; further details of this are provided below and at **Section 3.6, ES Chapter 3.0 (Alternatives)**.

### ***PEDW Inception Meeting***

#### *Overview*

- 1.5.1 The Applicant has engaged with PEDW throughout the preparation of the DNS application to share information about the Proposed Development and the DNS process.

#### *Inception Meeting*

- 1.5.2 An inception meeting was held on 04 May 2024; the Applicant provided PEDW with an overview of the early design of the Proposed Development, including the key environmental features and designations in the locality, the sustainability principles driving the need case and the desire to decarbonise the existing Kronospan Facility, the siting considerations, and the approach to maximising the proposed feedstock generated on-site as far as practicable.
- 1.5.3 Matters regarding formal DNS notification, the DNS preparation and submission process, and the need to inform PEDW of key programme milestones in advance were also discussed.

### ***Request for Pre-Application Advice***

#### *PEDW*

- 1.5.4 Early engagement has been undertaken with PEDW to ascertain a without prejudice view of the initial Proposed Development (including its principle, adherence to national planning policy, and proposed assessment) via a formal request for pre-application advice submitted to PEDW on 22 May 2024.



1.5.5 Formal pre-application advice was issued by PEDW on 19 June 2024. The advice was structured according to the eight points specifically set out in the pre-application advice request letter issued to PEDW as follows:

- 1. The principle of the Proposed Development as a Low Carbon CHP Facility that would be predominately (and potentially exclusively) manage on-site process residues and Grade C waste wood that is unable to be re-used or recycled.
- 2. Following on from the above, the principle that the proposed Low Carbon CHP Facility is considered as a low carbon renewable energy development not a conventional Energy from Waste (EfW) Facility.
- 3. Whether PEDW considers the proposed Low Carbon CHP Facility falls outside the remit of the Ministerial Written Statement (Taking Action to make the Circular Economy a Reality – March 2021) (The Ministerial Written Statement) which it is understood was primary published to drive municipal and similar commercial and industrial waste up the waste hierarchy i.e. recycling, reuse and reduction.
- 4. The status of the consented energy generating plant at Potters Yard, Welshpool with respect the likelihood of this facility coming into operation and whether it can reasonably be considered to be contributing to Wales' residual waste management needs on the basis that it has remained undeveloped 15 years after it was originally granted planning permission.
- 5. It is reasonable, due to proximity, for the existing Kronospan Facility in Chirk to contribute to the established need for residual waste treatment capacity in Mid and Southwest Wales.
- 6. The proposed scope and content of the DNS application, including the scope of supporting technical/environmental assessments (noting that the formal request for an EIA Scoping Direction will be made separately).
- 7. Any comments on the initial design or the location of the Proposed Development.
- 8. Any issues or concerns regarding the Proposed Development.

1.5.6 A summary of PEDW's responses to the eight points above is set out below in **Table 1.1**.



**Table 1.1 – Summary of PEDW’s Pre-Application Advice**

PEDW Response (Summary)	Subsequent Action
Points 1 – 3: Need to ensure compliance with Planning Policy Wales (PPW) Paragraph 5.13.10 (waste management objectives), The Ministerial Written Statement (the moratorium for large-scale EfW facilities), and Technical Advice Note 21 (Waste) (TAN 21). It was also stated that the new EfW by region information in the Strategic Assessment for the Future Need for Energy from Waste Capacity in the Three Economic Regions of Wales (March 2021) (The Strategic Assessment) would be a material consideration.	See Planning Statement ( <b>DNS4-001</b> ).
Point 4: The significance that can be attached to proposed capacity in determining the level of need will vary depending on the likelihood of facilities being built. With respect the Potters Yard permission, PEDW recommended that the Applicant liaises with Powys County Council; however, based on the information provided by the Applicant, it is not an unreasonable assumption that the scheme will not come forward in the near future	Noted. The Potters Yard permission is no longer considered relevant to this DNS application given RDF has subsequently been removed as a proposed feedstock (see
Point 5: The Ministerial Written Statement does not preclude waste being brought in from other regions where the source is in ‘close proximity’. Should the Applicant wish to make this argument, the Proximity Principle as described in PPW and TAN 21 may wish to be considered.	See Planning Statement ( <b>DNS4-001</b> ).
<p>Point 6: Validation requirements as set out in Article 12 of the Developments of National Significance (Procedure) (Wales) Order 2016 (as amended) and that all applications must include:</p> <p>Completed application form</p> <p>Copy of the acceptance of Notification issued on behalf of the Welsh Ministers.</p> <p>Site location plan.</p> <p>Any other plans, drawings and information necessary to describe the development.</p> <p>Copy of land ownership certificates.</p> <p>Design and Access Statement (DAS).</p> <p>PAC Report.</p> <p>Written statement regarding obligations under Section 106 of the TCPA.</p>	All provided with this DNS application. See Schedule of Documents ( <b>DNS1-001</b> ) for further details.
Point 6: The application should be accompanied by an ES, a written statement outlining any secondary consents (as	All provided with this DNS application. See

PEDW Response (Summary)	Subsequent Action
required), a Planning Statement (separate to the DAS), a Waste Planning Assessment, and a Green Infrastructure Statement.	Schedule of Documents ( <b>DNS1-001</b> ) for further details.
Point 7: PEDW is not aware of the site context as it is not our practice to undertake a site visit at pre-application stage. The appointed inspector would undertake a site visit as part of the examination stage.  Matters concerning the initial design or location of the Proposed Development will become apparent through the EIA Scoping exercise and will be included in PEDW's Scoping Direction	Noted.
Point 8: No further comments.	Noted.

- 1.5.7 A copy of the pre-application advice issued by PEDW is provided at **Appendix 1A**.

#### WCBC

- 1.5.8 Early engagement has been undertaken with WCBC to ascertain a without prejudice view of the initial Proposed Development (including its principle, adherence to national planning policy, and proposed assessment) via a formal request for pre-application advice submitted to WCBC on 23 May 2024.
- 1.5.9 A meeting was held on site (Kronospan, Chirk) with Robin Wynne Williams (Senior Minerals and Waste Planning Officer, North Wales Minerals and Waste Planning Service, acting on behalf of WCBC) on 08 August 2024. The initial advice (in advance of receiving the formal pre-application advice) from WCBC is summarised in **Table 1.2** below.

**Table 1.2 – Summary of Initial Pre-Application Engagement with WCBC**

Suggestion/Advice	Status
The application would benefit from the de-carbonisation aspects being clearly demonstrated including future aspirations.	See <b>Section 4.3, ES Chapter 4.0 (Description of the Proposed Development)</b> and <b>Section 3.0</b> of the Planning Statement ( <b>DNS4-001</b> ).
The application would be substantially improved if RDF was removed as a proposed feedstock (given the current policy position and recent energy from waste decisions (including DNS) in Wales).	RDF has been removed from the Proposed Development – see section below under the sub-heading 'EIA Scoping Direction – Addendum'.
Should RDF be pursued, thorough market research is required to understand what can be processed (availability, source, capacity); liaise with other facilities to better understand e.g. if third party	



Suggestion/Advice	Status
planned shutdowns could be utilised to take RDF to Chirk.	
Explore the potential for community heat benefits.	The work undertaken to explore the potential for community heat benefits is described in <b>Section 4.5, ES Chapter 4.0 (Description of the Proposed Development)</b> .
Explore the feasibility of a Health Impact Assessment which would better demonstrate the beneficial and adverse health impacts of the Proposed Development.	Population and Human Health (ES Chapter 11.0) has been scoped into the EIA and agreed with PEDW via the EIA Scoping Direction Addendum.
Explore alternative colour finishes to break up the visual impact; justification to be provided in the application as to preferred finish.	To examine the potential implications of substituting different cladding colours on the proposed CHP Building, a Colour Study (see <b>Appendix 3A</b> ) has been undertaken. Further details are provided at <b>Section 3.4, ES Chapter 3.0 (Alternatives)</b> and <b>Section 7.6, ES Chapter 7.0 (Landscape and Visual Impact Assessment)</b> .

- 1.5.10 The initial advice provided by WCBC is also provided at **Appendix 1B**.

### **Overview of EIA Scoping Process**

#### *EIA Scoping Direction*

- 1.5.11 In accordance with Regulation 14 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (The EIA Regulations), a formal request for a Scoping Direction was submitted to Planning and Environment Decisions Wales (PEDW) on 30 May 2024 and was accompanied by a Scoping Report (**Appendix 1C**) which set out the proposed EIA scope of the Proposed Development.
- 1.5.12 A formal Scoping Direction (**Appendix 1D**) was issued by PEDW on 31 July 2024 which confirmed that the Proposed Development would fall under Schedule 1, Part 10 of the EIA Regulations (and would therefore require EIA) and provided PEDW's opinion regarding the proposed EIA scope of the Proposed Development.
- 1.5.13 A response to the Scoping Direction setting out how each matter is addressed in the ES and details of where areas of disagreement are clarified and/or resolved is provided at **Appendix 1G**.

*EIA Scoping Direction – Addendum*

- 1.5.14 Following receipt of the Scoping Direction (**Appendix 1D**), formal pre-application advice from PEDW (received 19 June 2024), further informal discussions with PEDW and informal pre-application discussions with WCBC, the Applicant issued (on 15 October 2024) a document to PEDW entitled 'EIA Scoping Direction Clarification and Update to the Proposed Development Design' (**Appendix 1E**). This document provided details of the proposed changes to the Proposed Development which arose since the initial pre-application advice was sought, as well as setting out broad areas of agreement and disagreement/clarification with the EIA Scoping Direction referred to above. A summary of the main Proposed Development design changes made at this point is provided below:
- The status of the existing K7 Biomass Plant would change from 'remaining in operation' to 'remain in situ but be used as a back-up biomass plant only' – as a result, the existing K7 Biomass Plant feedstock would be re-directed for use in the proposed Low Carbon CHP Facility.
  - A detailed review of CHP Facility feedstock generated on-site was undertaken to understand the maximum wood residue feedstock that would be generated from existing and planned manufacturing operations.
  - The proposed use of RDF was removed.
- 1.5.15 The proposed change to the Proposed Development design also confirmed that the proposed electrical generating capacity of the proposed Low Carbon CHP Facility would increase from 30 megawatts (MW) to 40MW.
- 1.5.16 An EIA Scoping Direction Addendum (see **Appendix 1F**) was issued by PEDW on 14 January 2025 and provides PEDW's updated opinion regarding the proposed EIA scope of the Proposed Development.
- 1.5.17 A response to the Scoping Direction Addendum setting out how each matter is addressed in the ES and details of resolution of areas of disagreement is provided at **Appendix 1G**.

## ***Other Early Engagement with Stakeholders***

### *Overview*

- 1.5.18 During the early EIA stages (shortly after the submission of formal requests to PEDW and WCBC for pre-application advice and the submission of the formal request for a Scoping Direction from PEDW), the Applicant engaged with several local relevant stakeholders to discuss key issues to be considered during the development of the Proposed Development design and EIA process. A summary is provided below.

### *National Trust*

- 1.5.19 A face-to-face meeting was held with National Trust on 24 June 2024 to provide an overview of the Proposed Development, the DNS application process, and discuss any issues raised by National Trust. A summary of the key discussion points is provided below:
- National Trust is not a statutory consultee and is not able to formally contribute to the EIA scoping process. The Applicant subsequently shared the EIA Scoping Report and the EIA Scoping Direction later issued by PEDW.
  - Concern was expressed by the National Trust regarding the intended use of RDF as a feedstock.
  - National Trust previously requested off-site Priority Habitat enhancements on the land to the west of the existing Kronospan Facility to be secured as enhancements for the North Access Road planning permission (P/2022/1080). Those enhancements were not deemed to be necessary or proportionate by the Applicant or WCBC in determining that planning application. National Trust requested that the Applicant reconsider these off-site enhancements for the Proposed Development; the Applicant committed to further investigation as to the proportionality, relevance and requirement for such enhancements which would be influenced by the draft ES and the initial impact assessments.
  - The Applicant committed to keeping National Trust up to date with respect progress with the DNS application prior to submission and key timescales/milestones.
- 1.5.20 A further face-to-face meeting was held with National Trust on 13 August 2025 to further discuss the Proposed Development following confirmation of the proposed



changes to the Proposed Development and the subsequent EIA Scoping Direction Addendum, provide an overview of the draft Biodiversity Assessment Report (BAR) (**DNS4-007**) and proposed mitigation measures, and discuss any issues raised by National Trust. A summary of the key discussion points is provided below.

- National Trust is not a statutory consultee and is consulted by PEDW as part of the EIA scoping process. The Applicant subsequently shared the EIA Scoping Direction Addendum issued by PEDW.
- At Chirk Castle SSSI, small magnitude exceedance of screening thresholds is predicted for ammonia levels, nitrogen and acid deposition for the veteran trees feature. This is not predicted to result in a measurable ecological effect on woodland habitats, or to constitute an operation likely to damage the special interest of the SSSI.
- At Canal Wood LWS, a low magnitude impact of nitrogen and acid deposition in excess of the 1% screening threshold is predicted at the northern end of the woodland only. Predicted impacts at Canal Wood LWS are not considered likely to result in an unacceptable level of harm.
- National Trust's objective is for the SSSI to be holistically managed (regardless of landownership) and retained in favourable condition/status. The Maesgwyn Estate tenant farmers apply the same principles and work in partnership with Natural Resources Wales (NRW (as part of their tenancy agreements).
- National Trust is writing up a detailed Estate Management Plan (EMP) which sets out how the SSSI land is to be maintained in favourable condition; this will be shared with the Applicant.
- The Applicant and National Trust agreed to arrange a meeting to discuss the extent to which current SSSI management approaches align and to discuss any potential for the Applicant to adopt practicable measures to align with the National Trust EMP.

#### *Other Stakeholders*

- 1.5.21 Invitations were issued to Cadw, Glandŵr Cymru (Canal and River Trust in Wales), and the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty Joint Committee on 06 June 2024 to provide an overview of the Proposed Development and discuss any key issues that may influence the Proposed Development and the DNS process.

### *Kronospan Liaison Group*

- 1.5.22 Kronospan holds (approximately) quarterly meetings with the Kronospan Liaison Group (KLG) to discuss key issues and future development and aspirations. The regular attendees are: Kronospan; Brian Colley (Chair of Chirk Town Council (CTC)); Jackie Allen (Chair), Terry Evans and Frank Hemmings (CTC); Natural Resources Wales (Regulation) (NRW); WCBC Public Protection; and Unite the Union (on-site workforce union). Other CTC Councillors are also in attendance depending on availability.
- 1.5.23 The intention to construct a new Low Carbon (biomass) CHP facility to remove reliance on natural gas in line with Net Zero requirements and the overall progress of the Proposed Development draft application has been presented at numerous KLG meetings (July and October 2024; January, April, July, and December 2025).
- 1.5.24 No response to the above invitations were received by the Applicant.

### ***Topic Specific Engagement with Relevant Stakeholders***

- 1.5.25 Consultation has been undertaken, as required, with relevant stakeholders throughout the preparation of the ES topic chapters to ensure that key issues were identified and discussed prior to the completion of the EIA. Summaries of the stakeholder responses and how they have been addressed are presented in the ES topic chapters 5.0 – 11.0.

### ***Statutory Pre-Application Consultation***

- 1.5.26 Section 7, 8, 9, and 11 of the Developments of National Significance (Procedure) (Wales) Order 2016 (as amended) (“the DNSPWO) and Section 61Z of the TCPA require the Applicant to undertake statutory consultation prior to submitting a Development of National Significance (DNS) application. The statutory pre-application consultation period was between (insert date) and (insert date).
- 1.5.27 **PLACEHOLDER FOR INSERTION OF SUMMARY RESPONSES UPON COMPLETION OF PRE-APPLICATION CONSULTATION**
- 1.5.28 In accordance with Section 11(a) of the DNSPWO, a PAC Report (**DNS4-009**) has been prepared and accompanies this submission, which provides detailed information on the PAC process. The PAC Report sets out how the Applicant



complied with Section 61Z of the TCPA and how the responses to the consultation received from persons consulted under Section 61Z(3) or (4) of the TCPA was accounted for by the Applicant. **THIS PARAGRAPH IS A PLACEHOLDER AND WILL BE FINALISED UPON COMPLETION OF PRE-APPLICATION CONSULTATION – THE PAC REPORT IS NOT YET AVAILABLE.**

## 1.6 EIA Regulations

- 1.6.1 EIA was prescribed by European law under Council Directive 85/337/EEC. This Directive has been amended four times, with the latest amendment, the Environmental Impact Assessment (EIA) Directive (2014/52/EU) entering into force on 15 May 2014. In Wales, the Directive has been transposed most recently into law via the EIA Regulations.
- 1.6.2 Further details on the on the requirement for EIA and the EIA scope and methodology (including information about the EIA Scoping Direction) is provided at **ES Chapter 2.0 (EIA Methodology)**.

## 1.7 ES Structure and EIA Core Requirements

### *ES Structure*

- 1.7.1 All the chapters of the Main Report are summarised in a **Non-Technical Summary (Volume 1)** to provide an overview of the Proposed Development and the possible environmental implications, in concise lay terms.
- 1.7.2 **Volume 2 (Main Report)** introduces the project and details the technical assessments that have been undertaken to determine the likely effects of the Proposed Development. The chapters of the Main Report are as follows:
- ES Chapter 1.0: Introduction
  - ES Chapter 2.0: EIA Methodology
  - ES Chapter 3.0: Alternatives
  - ES Chapter 4.0: Description of the Proposed Development
  - ES Chapter 5.0: Noise and Vibration
  - ES Chapter 6.0: Air Quality and Odour
  - ES Chapter 7.0: Landscape and Visual Impact Assessment
  - ES Chapter 8.0: Historic Environment

- ES Chapter 9.0: Climate Change
- ES Chapter 10.0: Waste
- ES Chapter 11.0: Population and Human Health
- ES Chapter 12.0: Mitigation Schedule and Summary of Residual Effects

1.7.3 A series of **Illustrative Figures (Volume 3)** are provided, which illustrate the Proposed Development and provide graphical information to support each of the technical assessments.

1.7.4 A series of **Technical Appendices (Volume 4)** are provided that include details of the methodology and information used in the assessment, detailed technical schedules and, where appropriate, raw data.

### ***EIA Core Requirements***

1.7.5 **Table 1.3** below identifies where the information defined by Regulation 17 of the EIA Regulations can be found within the ES.

**Table 1.3 – Location of Information Required under Regulation 17 of the EIA Regulations**

<b>Specified Information</b>	<b>Where Information is Provided</b>
A description of the proposed development comprising information on the site, design, size and other relevant features of the development	ES Chapter 3.0 (Alternatives)  ES Chapter 4.0 (Description of the Proposed Development)
A description of the likely significant effects of the proposed development on the environment;	ES Topic Chapters 5.0 – 11.0  ES Chapter 12.0 (Mitigation Schedule and Summary of Residual Effects)
A description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;	ES Chapter 3.0 (Alternatives)  ES Chapter 4.0 (Description of the Proposed Development)  ES Topic Chapters 5.0 – 11.0  ES Chapter 12.0 (Mitigation Schedule and Summary of Residual Effects)
A description of the reasonable alternatives studied by the applicant or appellant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the significant effects of the development on the environment;	ES Chapter 3.0 (Alternatives)

Specified Information	Where Information is Provided
A non-technical summary of the information referred to in sub-paragraphs (a) to (d); and	ES Non-Technical Summary
Any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.	ES Topic Chapters 5.0 – 11.0

## 1.8 EIA Assessment Team and Statement of Competence

- 1.8.1 The ES was compiled and coordinated by Axis, a planning and environmental consultancy based in Flintshire. The Axis project lead for this application is Bobby Clayton. Bobby has been a chartered member of the Royal Town Planning Institute since 2007 and has over 20 years' experience in the coordination and preparation of major planning applications, including those prepared and submitted in accordance with the various EIA Regulations.
- 1.8.2 As required under Regulation 17 (4a and 4b) of the EIA Regulations, the Applicant has engaged competent experts to prepare the ES (see summary provided at **Table 1.4**). As per Regulation 17 (4b), each of the technical assessment chapters (ES Chapters 5.0 to 11.0) include a statement outlining the relevant expertise and/or qualifications of the experts that prepared the chapter.

**Table 1.4 – EIA Team: Technical Competence**

ES Chapter	Company
Chapters 1.0 – 4.0, 7.0, and 12.0	Axis
Chapter 5.0	Noise & Vibration Consultants Limited
Chapter 6.0 and 9.0	Fitchner Consulting Engineers Limited
Chapter 8.0	Heritage Archaeology
Chapter 10.0 and 11.0	Savills



# Appendix 1A – PEDW Pre-application Advice



# **Appendix 1B – WCBC Pre-Application Advice**



# Appendix 1C – EIA Scoping Report



## Appendix 1D – EIA Scoping Direction



# **Appendix 1E – EIA Scoping Direction Clarification and Design Update**



# Appendix 1F – EIA Scoping Direction Addendum



## **Appendix 1G – EIA Scoping Direction and Addendum (Applicant Response)**

