

EIA Scoping Direction Addendum

DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP

14/01/2025

Prepared by:

Tanya Leck BA MSc

This Scoping Direction Addendum is provided on the basis of the Scoping Clarification Report (SCR) submitted to Planning and Environment Decisions Wales on 15 October 2024 in addition to consultation responses received. The advice does not prejudice any recommendation made by an Inspector or any decision made by the Welsh Ministers in relation to the development, and does not preclude the Inspector from subsequently requiring further information to be submitted with the submitted DNS application under Regulation 24 of [The Town and Country Planning \(Environmental Impact Assessment\) \(Wales\) Regulations 2017](#) (as amended) ("The 2017 Regulations"). This Scoping Direction Addendum should be read in conjunction with the original Scoping Direction for this potential DNS application issued on 31 July 2024. **Together, the original Scoping Direction issued 31 July 2024 and this Addendum constitute the most recent Scoping Direction for the purposes of regulation 17(4)(c) of the 2017 Regulations.**

1. Consultation

In line with [Regulation 33\(7\)](#) of the 2017 Regulations, formal consultation was undertaken with the following bodies:

- Wrexham County Borough Council (North Wales Minerals and Waste Planning Service responded on behalf of Wrexham County Borough Council)
- Natural Resources Wales
- Cadw
- Transport Directorate of the Welsh Government
- Transport for Wales
- Network Rail
- Defence Infrastructure Organisation
- Hafren Dyfrdwy
- Dŵr Cymru Welsh Water
- The Health and Safety Executive
- The Coal Authority
- The Canal and River Trust
- North Wales Fire and Rescue Authority

Additional consultation was undertaken with:

- Shropshire Council (Neighbouring Authority)

Responses received are included at **Appendix 1**.

2. Planning and Environment Decisions Wales (PEDW) comments

Overall the aspects of the environment scoped in to the Environmental Statement as outlined in the original Scoping Direction remain unaffected. Following the submission of additional information, PEDW are satisfied that Geology, Hydrogeology and Contaminated Land can be scoped out of the ES.

2.1 Section 2 - Changes to the Proposed Development

Section 2 of the SCR sets out changes to the proposed development since the Scoping Direction was issued. This includes increasing the proposed generation capacity from 30 megawatts (MW) to 40 MW of electricity. The proposed thermal energy generation capacity is to remain at 125 MW.

The SCR also confirms changes to the sources of feedstock for the CHP, resulting in feedstock for the proposed CHP facility being produced predominately (88.7%) by existing on-site processes. The SCR sets out an increase in feedstock from on-site process residues (bark, MDF and particleboard process residues) and fuel to be diverted from one biomass boiler to the CHP.

The SCR states that the feedstock is no longer proposed to be from imported Grade C Waste Wood, Refuse Derived Fuel (RDF) or Forestry Residues. However, paragraph 2.3.5 of the SCR goes on to state that this results in a feedstock shortfall of 32,887 TPA, which is proposed to be met through a combination of the following:

- i) 50% (16,444 TPA) - The import of forestry brash for direct use in the proposed CHP facility.
- ii) 25% (8,222 TPA) - The import of Grade C waste wood for direct use in the proposed CHP facility.
- iii) 25% (8,222 TPA) - Increasing on-site production to generate further on-site process residues for indirect use in the proposed CHP facility.

Paragraph 2.3.8 also confirms that there would still be 7 HGVs (14 two-way journeys) per operational day. Based on the information in the SCR, feedstock is still proposed to be imported to the site. As the ES should be based on the worst-case scenario, the impact of importing waste must be included in the EIA. Further detail regarding the assessment of waste impacts is included in section 4 below.

PEDW confirm that the changes to the proposal remain consistent with the overall parameters of the previous iteration and that the EIA Scoping Direction remains relevant. It is expected that the development will follow an iterative design process following the outcome of surveys and consultation. The ES should describe the alternatives considered by the applicant.

2.1 Section 3 – Broad areas of agreement with the EIA Scoping Direction

Biodiversity

The SCR states “*The general consensus appears to be that a standalone Biodiversity ES chapter can be scoped out [..]*”. PEDW clarify that, as set out in the Scoping Direction, biodiversity is scoped in to the ES, however not as a standalone chapter. The ES must address the potential for noise and air quality impacts on off-site ecological receptors.

PEDW support the provision of a Biodiversity Assessment Report (BAR) as proposed by the applicant. Whilst the SCR states that the BAR would not be part of the ES, it is noted that the report would include details of sensitive ecological receptors and an assessment of proximal impacts of noise. As biodiversity impacts from noise and air quality are scoped in to the ES,

PEDW direct that the BAR should be appended as a technical appendix to the ES to support the assessment of biodiversity impacts within the Noise and Air Quality chapters.

Vibration, Population and Human Health and Construction Environmental Management Plan

PEDW concur with the approach set out in the SCR regarding Vibration, Population and Human Health and Construction Environmental Management Plan.

2.2 Section 4 – Broad areas of disagreement / clarification with the EIA Scoping Direction

Landscape and Visual Impact Assessment (LVIA) Cumulative Effects

PEDW welcome confirmation in the SCR that the cumulative assessment undertaken as part of the LVIA will include existing features, consented and proposed development. The applicant's attention is drawn to comments from NRW at appendix 1, which confirm that the cumulative assessment should consider the cumulation of effects of the proposal in combination with relevant existing developments. PEDW highlight that whilst developments that have already been built and are operational will form part of the baseline, this does not mean that they should be excluded when considering cumulative effects. Paragraph 5 of Schedule 4 of the 2017 Regulations makes it clear that consideration of cumulative effects should include existing development. This should be included in the LVIA as part of the ES.

LVIA Photography

PEDW welcome confirmation from the applicant that they will reshoot photography from Viewpoint Q and Viewpoint X from nearby alternate locations. PEDW continue to advise that viewpoint locations should be optimised and relevant to this application and should be selected for the purpose of assessing the impact of this development. The applicant should provide their methodology and rationale for the selection of viewpoints in the Environmental Statement.

Presentation of LVIA Photography

The applicant's attention is drawn to NRW's comments at appendix 1, within which they confirm their preference for the presentation for the photographs and visualisations. PEDW recommend the baseline photography is presented at the same scale as the wireframe and photomontage visualisations to allow like-for-like comparison. [Technical Guidance Note 06/19](#) (Landscape Institute, 2019) which supports GLVIA3 states that the baseline photography should be presented at a size and relative position, on a corresponding sheet, to allow like-for-like comparison with the visualisations.

LVIA Sensitivity of Receptors

The applicant does not agree that users of the canal are of high sensitivity. The applicant's attention is drawn to comments from the Canal and Rivers Trust at appendix 1, within which they set out that the users are considered high sensitivity based on the scale of the development and the proximity to the canal. Previous applications referred to in the SCR were for alternative schemes. I see no reason to disagree with the Canal and Rivers Trust. Sensitivity

should be determined on a case-by-case based on the development type, for example where key characteristics and qualities of the receptor are highly sensitive to change from the development type. The sensitivity of each receptor should be determined in accordance best practice guidance and reasoned justifications provided to support the assessment. The applicant should continue to liaise with the Canal and Rivers Trust on the methodology to inform the assessment. Should the applicant be unable to reach agreement it is essential the ES contains a robust rationale for the approach adopted, giving detail about the application of professional judgment where relevant.

Geology, Hydrogeology and Contaminated Land ES Chapter

PEDW note the Phase 1 Geo-Environmental Assessment Report provided as an appendix to the SCR. NRW concur with the recommendations in the report, noting that planning conditions can control unsuspected contamination and secure a piling risk assessment. On the basis of the additional information provided, The SCR confirms that a CEMP will be provided to manage the potential risks to the environment from the construction phase, including a protocol for encountering unsuspected contamination. PEDW advise that a draft CEMP should be included as a technical appendix to the ES.

On the basis of the further information submitted, PEDW are satisfied that Geology, Hydrogeology and Contaminated Land can be scoped out of the ES.

Material Assets and Waste ES Chapter

The SCR contends that significant effects would be unlikely as the feedstock is now proposed to be provided predominately by waste from on-site processes. Therefore, a separate Material Assets and Waste ES chapter would not be proportionate. PEDW confirm that an assessment of waste is required regardless of whether the waste is from on-site or off-site sources. Given the nature of the development as an energy from waste project, the development has the potential for significant waste impacts which must be assessed as part of the ES. PEDW direct that Material Assets and Waste should be scoped in to the ES.

As noted in section 2 above, there still appears to be potential for off-site waste to be imported for feedstock. The ES should be undertaken on the worst-case scenario, therefore the impact assessment should be undertaken on the basis of a proportion of the feedstock from imported waste, as set out in the SCR.

PEDW welcome that a Waste Assessment will be provided. PEDW reiterate that this should be included as a technical appendix to the ES, to support a proportionate ES chapter on waste.

Appendix 1: Consultation Responses

From: [Robin Wynne Williams](#)
To: [PEDW – Seilwaith / Infrastructure](#)
Cc: [matthew.phillips](#) [REDACTED] [Hannah Parish](#)
Subject: EIA Scoping Direction Addendum Consultation - DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP - due 19/11/2024
Date: 18 December 2024 14:02:57
Attachments: [image003.png](#)
[Wrecsam Scoping.pdf](#)

Dear Ms Tanya Leck,

Further to your e-mail of the 22nd October, requesting a response by the 19th November, apologise for the late response.

WCBC submitted the attached response to the Scoping Direction Request relating to the above on the 21st June this year and the North Wales Minerals and Waste Planning Service have been requested to respond to the Addendum on their behalf.

Further information has been submitted by the applicant in the form of an *“EIA Scoping Direction Clarification Document and Notification of Formal Update to the Proposed Development Design”* that describes the evolution of both the proposal and considers resultant Environmental Impacts of the evolved scheme against the Scoping Direction issued by PEDW. From information contained within the Report and the accompanying supporting documentation and plans; the Service in collaboration / on behalf of WCBC are in broad agreement with its contents and considers the matters of disagreement/clarification raised to be matters to be discussed and agreed with PEDW and NRW.

Yours sincerely,

Robin Wynne Williams – BA, MA, MPLAN, MRTPI

Uwch Swyddog Cynllunio Mwynau a Gwastraff

Senior Minerals and Waste Planning Officer

Ar ran Gwasanaeth Cynllunio Mwynau a Gwastraff Gogledd Cymru /

On behalf of the North Wales Minerals and Waste Planning Service

Tel: [REDACTED]

ebost/email: [REDACTED]



From: PEDW.Infrastructure@gov.wales <PEDW.Infrastructure@gov.wales>

Sent: 22 October 2024 16:07

Subject: EIA Scoping Direction Addendum Consultation - DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP - due 19/11/2024

Dear Consultees,

Please find attached a consultation letter regarding an EIA Scoping Direction request for DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP. We consulted you earlier this year, and subsequently issued a Scoping Direction for this project on 31/07/2024. This is a follow up request from the applicant. We intend to deal with this as a Scoping Direction Addendum, which will be read in conjunction with the original Scoping Direction issued in July.

The following information has been submitted with this request:

- 2024-10-15 - From Agent - Scoping Addendum Request
- 2024-10-15 - EIA Scoping Direction Addendum Request - Scoping Clarification Report
- 2024-10-15 - EIA Scoping Direction Addendum Request - Figure 1.1 Statutory Plan



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-266991-B3M6
Eich cyf/Your ref: CAS-03463-R2W9C2

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

Planning & Environment Decisions
Wales
Crown Buildings,
Cathays Park,
Cardiff,
CF10 3NQ

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

21/11/2024

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990 THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT (WALES) REGULATIONS 2017

PROPOSAL: EIA SCOPING OPINION FOR A PROPOSED LOW CARBON COMBINED HEAT AND POWER (CHP) FACILITY

LOCATION: LAND WITHIN THE EXISTING KRONOSPAN FACILITY, MAESGWYN FARM, CHIRK, LL14 5NT

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales on the additional information for a scoping opinion request for the above application which we received on the 22/10/2024 and 18/11/2024.

We originally provided our response to the EIA scoping consultation on 11/07/2024 (reference CAS-257276-F9Q3). We note the additional information that has been submitted since then (22/10/2024 and 18/11/2024) and our updated advice following review of this is included in the Land Contamination and Groundwater and Designated Landscape sections below. Our advice on the other topics remains the same"

We are commenting because we consider that the proposals are likely to give rise to significant effects.

We advise that the likely significant effects are assessed by the applicant and we consider that they should be 'scoped in' to any future Environmental Statement (ES).

Please note that the comments provided herein are made without prejudice to any further advice NRW may need to give, or decisions NRW may need to take, should different circumstances or new information emerge that NRW will need to take into account.

Our following comments include those matters within NRW's remit that we consider will need to be taken into account and applied to the Environment Impact Assessment (EIA) and the resulting ES. We have reviewed the following supporting documents in addition to the submitted figures and appendices:

- Kronospan Low Carbon Combined Heat and Power Facility, EIA Scoping Report, May 2024, Reference 3587-01-SR, Axis P.E.D. Ltd
- Kronospan Low Carbon Combined Heat and Power Facility, EIA Scoping Direction Clarification Document and Notification of Formal Update to the Proposed Development Design, October 2024, Reference 3587-01-TN01, Axis P.E.D. Ltd
- Phase 1 Geo-Environmental Assessment, October 2024, Reference R3148-R01-v4, Smith Grant Environmental Consultancy LLP

We note that additional drawings and plans were also submitted on the 18/11/2024 and we have no additional comments in respect of these.

The proposal is for the development of a Low Carbon Combined Heat and Power (CHP) Facility on land at the existing Kronospan Facility. Section 1 of the Environmental Impact Assessment (EIA) Scoping Report states that:

- *The Proposed Development would have the capacity to generate up to 30 megawatts (MW) of electricity and 125MW of thermal energy for use in the existing manufacturing processes at the existing Kronospan Facility. The fuel for the Proposed Development would predominately comprise on-site process wood residues and Grade C waste wood but would also be capable of using forestry residues and/or Refuse Derived Fuel (RDF)*

In addition to being a 'specialist consultee' under the 2016 Order, Natural Resources Wales exercises functions under legislation including (but not limited to) the Environmental Permitting (England and Wales) Regulations 2016 (as amended). We provide comments in Appendix 1 (Environmental Permitting) as part of our regulatory function; all other comments are provided as part of our 'specialist consultee' role.

Protected Sites

Air Quality

1. The proposed development is located approximately 575m away from the Chirk Castle and Parkland Site of Special Scientific Interest (SSSI). The SSSI is designated for being one of the best examples of ancient wood pasture and parkland in Wales, containing a large number and diverse species of veteran and ancient trees. The site is also of special interest for the important saproxylic (dependent on dead or decaying wood or associated fungi and microorganisms) invertebrate species that these trees support. Also of special interest is the site's breeding roost of lesser horseshoe bats (*Rhinolophus hipposideros*).

The grassland supports a diverse assemblage of grassland fungi which is of special interest and of national importance, including 15 species of waxcap.

2. The project has the potential to affect air quality and cause indirect effects on protected sites during the operational phase (due to both air pollution and dust). Section 4 of the EIA Scoping Report confirms that Air Quality will be scoped in to the EIA. Air Quality is considered further in Section 7 of the EIA Scoping Report. We note the following in relation to protected sites (ecologically sensitive receptors):

"7.6.30: An assessment will be undertaken of the impact of emissions, including acid and nitrogen deposition, at ecologically sensitive receptors identified within the screening distance for habitats outlined in the EA guidance document "Air Emissions Risk Assessment for your Environmental Permit" (the Air Emissions Guidance)."

3. Paragraph 7.6.31 confirms that the following protected sites are to be assessed in relation to potential air quality impacts:
 - River Dee and Bala Lake Special Area of Conservation (SAC)
 - Johnstown Newt Sites SAC
 - Berwyn and South Clwyd Mountains SAC
 - Berwyn Special Protection Area (SPA)
 - Chirk Castle and Parkland Site of Special Scientific Interest (SSSI)
 - Nant-y-Belan and Prynella Woods SSSI
4. We advise that the ES should fully assess impacts of air pollution and dust on the protected sites. The ES will need to identify impact pathways for the protected sites, clearly assess the possible levels of impact and, where impacts are likely, provide full details of appropriate mitigation measures to address those impacts. The ES should include an assessment of the amount of predicted pollution from the proposal against the relevant critical loads and critical levels for any protected sites that may be affected.
5. We agree with the proposed approach and methodology regarding detailed dispersion modelling and note that it will be in accordance with the methodology outlined in the Institute of Air Quality Management (IAQM) guidance document "Guidance on the assessment of dust from demolition and construction" (January 2024).
6. In light of the Wealden judgement, (CO/3943/2016: Wealden District Council v Secretary Of State For Communities And Local Government (<http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html>)), we advise that (even when the Process Contribution is less than 1%) consideration of other relevant projects may be required to ascertain whether there are possible in-combination effects.

Foul drainage

7. We note the application site is within the catchment of the River Dee and Bala Lake SAC. In line with our [*Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation \(28 June 2024\)*](#), under the Habitats Regulations, planning decision-makers must consider the impact of proposed

developments on water quality within SAC river catchments. We therefore advise that you should consider whether the proposals would increase the volume of foul discharge from the site in planning terms.

8. This project proposes to use the existing foul water connection to the mains sewer. Table 12.1 of the EIA Scoping Report states that a surface water and foul water drainage strategy will be provided to demonstrate that the existing systems will effectively manage surface, foul and trade effluent. Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine.
9. We therefore advise you to take our [Advice into account](#), specifically the section titled 'What does this mean for development proposals involving connection to public wastewater treatment works?' in your determination of whether the development is likely to have a significant effect on the SAC. Should you determine that an Appropriate Assessment is required, the Applicant will then need to submit whatever evidence they deem appropriate (seeking advice from consultants as may be necessary) to demonstrate no adverse effect on site integrity.

Special Area of Conservation/Special Protection Area

10. With regards to the DNS application, PEDW is the Competent Authority for the purposes of the Conservation of Habitats and Species Regulations 2017 (as amended). As such, they must not agree to any plan or project unless they are certain it will not adversely affect the integrity of a SAC/SPA/Ramsar site.
11. PEDW should carry out a test of likely significant effects (TLSE) for the relevant SAC/SPA/Ramsar sites which is required under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This test applies to impacts on the sites from the proposed works, either alone or in-combination with other plans and projects.
12. If the test concludes there is likely to be a significant effect, then an Appropriate Assessment of the impacts on SAC/SPA/Ramsar sites from the proposed works, either alone or in combination with other plans and projects, will be required. We would be able to assist with that assessment in our role as the Statutory Nature Conservation Body under the above Regulations.

Sites of Special Scientific Interest

13. The Wildlife and Countryside Act 1981 (as amended) places a duty on public authorities in exercising their functions, so far as this is likely to affect the flora, fauna, geological or physiographical features of a SSSI, to take reasonable steps consistent with the proper exercise of their functions to further the conservation and enhancement of those features.
14. We refer you to our [website](#) for further advice.

Protected Species

15. We have reviewed the following plans and documents prepared to support the EIA scoping consultation:
- Statutory Plan, Kronospan Low Carbon Combined Heat and Power Facility, dated June 2024 by Axis
 - EIA Scoping Report, Kronospan Low Carbon Combined Heat and Power Facility, dated May 2024 by Axis
16. The development proposal lies within an existing industrial development. We therefore agree that the assessment of the development's direct impact on protected species can be scoped out of the EIA.
17. We recommend that you consult the local authority's ecologist on the scope of the ES to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan, and that are considered important for the conservation of biological diversity in Wales.
18. NRW would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (e.g., Wildlife Trust, Amphibian and Reptile Conservation).

Land Contamination and Groundwater

19. We note that a Construction Environmental Management Plan (CEMP) has been scoped out of the EIA. However, the applicant states that:
- "It is envisaged that a CEMP would be required by planning condition and would be adhered to during construction works. The CEMP would include construction mitigation measures for all relevant scoped in and scoped out environmental topics to ensure all relevant best practice and site-specific mitigation measures are included and implemented during the construction phase."*
20. With respect to the protection of controlled waters, potential interferences / exposure of contaminated land, and management of waste materials during the construction phase, we note the intention to implement a CEMP required by condition and would wish to review this document as part of any associated discharge of condition application. Guidance for pollution prevention can be accessed via [Guidance for Pollution Prevention \(GPP\) documents | NetRegs](#).
21. The extension of the installation boundary will require a site condition report to establish the baseline conditions for soil and groundwater. Although scoped out of the EIA, the first item in Table 12.1 – Other Supporting (Non-EIA) Assessment Information of the EIA Scoping Report refers to Geology, Hydrogeology and Contaminated Land and proposes a scope of work through to the preparation of a Phase I Geo-Environmental Assessment Report with recommendations for Phase II work (if required).

22. The additional information submitted on 22/10/24 included a Phase 1 Geo-Environmental report (Phase 1 Geo-Environmental Assessment, October 2024, Reference R3148-R01-v4, Smith Grant Environmental Consultancy LLP). We concur with the suggested approaches to unsuspected contamination and a piling risk assessment and advise that these could be secured by conditions attached to any development consent permission granted for the proposals.

Designated Landscape

23. The application site is approximately 520m from the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB)/National Landscape (NL).

24. Our landscape planning advice relates to the landscape character and visual amenity of the Clwydian Range and Dee Valley AONB/NL and the statutory purpose of the designation to conserve and enhance its natural beauty.

25. We have reviewed the EIA Scoping Report, in particular Chapter 8 (Landscape and Visual Impact Assessment - LVIA) and the supporting Figures, which include a Zone of Theoretical Visibility (ZTV) analysis (Figure 8.1), baseline viewpoint photography (Figures 8.2a-t), and wireframes (Figures 8.3a-e).

26. The site is located within the existing Kronospan Facility. The proposed stack (95m) would be the tallest structure within the Facility, in which there are already several stacks varying in height between 50m and 70m. The proposed boiler building would be approximately 44m high. All other components of the proposed development would be below this height.

27. We are satisfied with the proposed scope of the LVIA and agree with the receptors which may experience significant effects identified in paragraph 8.5.1, summarised as follows:

- Landscape character within the study area, which includes the AONB/NL.
- The special qualities of the AONB/NL.
- Views and visual amenity of people within the AONB/NL, including people using the public rights of way network and visitors to Chirk Castle.

28. Special qualities of the AONB/NL are listed in paragraph 8.2.3. We advise that the LVIA should also refer to further evidence on those qualities, including within the *Supplementary Planning Guidance Note: Clwydian Range and Dee Valley AONB*, June 2018.

29. We note the LVIA will include an assessment of the visual impact of the additional plume from the proposed stack, and agree this is appropriate. The cumulative impact of this plume in combination with the other plumes should be considered.

30. The Applicant states that the cumulative effects assessment will include a consideration of the interactions between the Proposed Development and other consented or proposed

schemes (para. 8.5.1 vi). This will include the recent application for construction of a new access road, lorry park, weighbridge and building, and car park (LPA Ref: P/2022/1080).

31. We advise that the cumulative assessment should also consider the overall cumulative impact of the proposed development and the existing facility on the AONB/NL and visual receptors within the AONB/NL in combination, particularly as the existing facility will be reflected in the assessment baseline and is likely to be used to justify the individual impacts of the proposed development.
32. In response to our advice above, we note that Section 4.2.4 of the EIA Scoping Direction Clarification Document submitted on 22/10/2024 states *“The presence of the existing Kronospan facility is a well-established part of the landscape and visual context into which the Proposed Development would be introduced and thus is part of the assessment baseline (reflecting the requirements of the GLVIA as quoted above). All conclusions made regarding the landscape and visual effects of the Proposed Development will reflect its addition to the existing facility - i.e. the increased influence of the enlarged facility. This is not a ‘cumulative’ effect, rather it is the effect of the Proposed Development introduced into the existing landscape and visual context.”*
33. However, we continue to advise that a cumulative assessment should report on the cumulation of effects of the proposals in combination with any existing developments that are likely to interact with the proposals. The existing facility is therefore relevant in this regard. If the assessment is only premised on the existing facility justifying or reducing the impact of the proposed change, then the overall change to the landscape, which may not be acceptable, would not be assessed. This can be avoided by providing a commentary on the overall cumulative effect of the two developments (existing and proposed) in combination.
34. We consider that the development would increase the overall bulk and mass of the industrial facility, potentially increasing its prominence in views from locations within the AONB/NL. We note it is proposed to undertake further analysis regarding the size, scale and appearance of the proposed structures to determine the potential for reduction of landscape and visual effects (para. 8.4.3). We advise that the findings of the preliminary LVIA should inform this analysis.
35. We note provisional proposals are to finish the proposed structures in ‘goosewing grey’ to match the existing Facility. In seeking to reduce the perceived scale/mass and impact on views from within the AONB/NL, we advise testing the impact of different colour / treatments to visually fragment the overall massing of the proposed development / Facility. The use of a darker colour / finish on the proposed boiler building, for example, may assist in reducing the perceived increase in building mass. This testing could be done through the preparation of visualisations.
36. Ten viewpoint locations have been identified within the AONB/NL. It is proposed to prepare one photomontage from within the AONB/NL (at VP B) and wireframes from seven other viewpoints within the AONB/NL.

37. The Applicant intends to re-use photographs from 2022, which we understand were taken for a different purpose. This may explain why some of the viewpoint locations are not optimised for this specific application, for example:
- At VP Q, a tree obscures the view towards the site. Walking a short distance to the north of this viewpoint would have avoided this issue. VP R is the only viewpoint from which no wireframe or photomontage is proposed, but it offers largely unobstructed visibility towards the site and therefore would be a more useful viewpoint for the preparation of a wireframe than VP Q.
 - There is a similar issue with VP X, where trees in the mid-ground obscure the view of the site. Views of the site and development are expected from locations east along the road from VP X, and this should be considered.
38. We therefore advise that all viewpoints should be selected, including through micro-siting on site, for the purposes of assessing the impacts of this specific application.
39. Visualisations should be provided to inform the assessment of effects both on visual receptors (people) and on the character of the landscape as an environmental resource in its own right.
40. We note that all photography and any visualisations will be prepared and presented in accordance with Technical Guidance Note 06/19, which is the appropriate guidance.
41. However, we note that some of the baseline photographs are presented at a smaller page size than other viewpoint photographs e.g. VP H.
42. Section 4.2.13 of the EIA Scoping Clarification Document requested confirmation on whether all wireframe and photomontage figures should be *“presented at the same scale as the baseline photography (ie at double A3 width”*
43. We advise that the photographs and visualisations should be presented on the paper size at which the image is intended to be printed (i.e. 841mm width x 420mm height, as stated on the Applicant’s photographs). This will also allow interested parties who wish to view the images on screen to be able to view them at the correct scale when they are viewed at 100% / ‘actual size’.

Flood Risk

44. The site is located in Zone A as defined by the Development Advice Map (DAM) referred to in Technical Advice Note (TAN) 15: Development & Flood Risk (2004). According to the Flood Map for Planning (FMfP), the site lies within Flood Zone 1.
45. Given the site’s flood zone designation, we do not foresee that the proposal would have a significant impact on flood risk and we concur with the conclusion to scope flood risk out of the ES.

Other matters

Our advice is made without prejudice to comments we may subsequently wish to make when consulted on any DNS application, the submission of more detailed information or an ES.

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

Please advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

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

Yours faithfully,

Rachael Burke

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

E-bost/E-mail: northplanning@cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

Appendix 1

Environmental Permitting

As the scheme may require one or more consents for which we are the consenting body, please refer the applicant to the [table of NRW consents](#). This table sets out the determination period for consents for which we are the consenting body.

Kronospan Ltd. hold an Environmental Permit in accordance with the requirements of the Environmental Permitting (England & Wales Regulations) 2016 for the operation of the installation comprising of wood-based panels and associated products, and two CHP biomass plants already on site. The proposed changes to the installation including alteration to existing operations and the addition of new Schedule 1 listed activities (e.g. Large Combustion Plant) will require a substantial permit variation.

As part of the permit variation determination process we will assess the impact of emissions to air, land and water (including noise and odour). The application will be assessed against the technical requirements of the relevant Best Available Techniques Reference (BREF) notes and associated BAT Conclusions Documents (BATC) for those listed activities to ensure compliance with the requirements of the Industrial Emissions Directive.

When submitting an application for an Environmental Permit, recently published guidance: [Noise and vibration management: environmental permits - GOV.UK \(www.gov.uk\)](#) should be followed. This states “*When you apply for a variation, do not include noise from the existing site (before changes) as part of the background or the residual sound levels. Your noise impact assessment must consider all the noise resulting from the proposed variation – the existing site and the variation together. Show both components clearly and then add them together to give a new total for site noise at the receptors. The impact assessment will be based on this new value, known as the ‘specific level’ in BS 4142.*”



Glandŵr Cymru
Canal & River Trust in Wales

PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Your Ref DNS CAS-03463-R2W9C2

Our Ref IPP-232

Friday 1st November 2024

PEDW.Infrastructure@gov.wales

Dear Sir/Madam,

Applicant: Kronospan Limited

Proposed Development: A low carbon combined heat and power (CHP) facility on the existing site. The Proposed Development would comprise the following key components: Feedstock storage and handling; boiler building; turbine building; service building; air cooled condenser (ACC); flue gas treatment facility; air pollution control (APC) regent silos and residue silos; ash storage; water treatment; and stack.

Site Address: Land within the existing Kronospan Facility, Maesgwyn Farm, Chirk, LL15 5NT

Thank you for your further consultation on the second request for an EIA Scoping Direction.

We are the charity who look after and bring to life 76 miles of canals in Wales. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of Wales. The Trust is known as Glandŵr Cymru, the Canal & River Trust in Wales.

We have reviewed the additional EIA Scoping Document and proposed methodologies outlined within the Scoping Clarification Report dated 15th October 2024 (ref: 3587-01-TN01). The further comments below should be read in conjunction with our previous comments in our letter dated 4th July 2024.

Having reviewed section 4 of the applicants report in terms of the broad matters of disagreement/clarification, we note that the applicant has offered a rebuttal on a number of matters which they do not consider should be scoped into the EIA.

Landscape and Visual Impact Assessment

As set out previously, Glandŵr Cymru own and manage the Llangollen Canal and Pontcysyllte Aqueduct, which are within the designated Canal World Heritage Site (WHS) and a designated conservation area.

As set out previously, we agreed that this topic should be scoped into the EIA. As set out within the documentation the tallest component of the development would be the stack (95m); whilst the boiler building would be approximately 44m high. There are potentially significant temporary and permanent visual effects to the area during and post construction which would affect the current character, tranquillity and experience of the waterways as well as permanent visual effects following completion of the development. This should be fully considered and addressed within the Environmental Statement.

Canal & River Trust Planning Team

Canal & River Trust, National Waterways Museum, Ellesmere Port South Pier Road Ellesmere Port Cheshire CH65 4FW
T: 0151 355 5017 **E:** nationalwaterwaysmuseum@canalrivertrust.org.uk **W:** canalrivertrust.org.uk

The development will be within the footprint of the existing complex, however as shown in the relevant canal viewpoints and wireframes, the development will be visible from the canal and its associated users/receptors. We set out that we consider that the waterway and its users (boaters and towpath users) should be recognised as visual receptors with high sensitivity within the LVIA.

The applicant does not agree with our comments on the LVIA sensitivity of receptors to be attributed to waterway users. Our comment that waterway users would be of high sensitivity was based on the proximity to the proposed development and scale of development proposed. At paragraph 4.2.17 the applicant appears to be relying on previous planning applications to establish and justify the sensitivity. We do not agree that this is the correct approach, not least because those are for different developments. Application P/2022/1080 was for a lorry park and associated development and was offset from the canal corridor and P/2022/0765 was a development for raw material silos up to 33m in height. If these were assessed as either 'medium' or 'medium to high' as part of the LVIA's for those developments, then the development on the scale now proposed should rightly be assessed as 'high' for canal users. This is especially given the scale of the development now proposed as part of this project and proximity to the canal corridor, with a building up 44m high and stack up to 95m and the associated likely visual impact from the canal corridor.

As set out at paragraph 4.2.18, the sensitivity of each receptor will need to be determined and reasoned justification provided for all judgements, and we look forward to reviewing such justification in due course.

The above comments are given as guidance, in our capacity as a statutory consultee and are based on the submitted details at this stage and do not prejudice any future comments or concerns that may be raised at a later stage.

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

Yours sincerely,

Tim Bettany-Simmons MRTPI

Senior Planner – Major Projects & Infrastructure

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

Canal & River Trust Planning Team

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From: [Arnold, Jenna \(ECWL - Culture, Heritage and Sport - Cadw\)](#)
To: [PEDW – Seilwaith / Infrastructure](#)
Subject: RE: EIA Scoping Direction Addendum Consultation - DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP - due 26/11/2024
Date: 21 November 2024 12:32:17

Good afternoon Tanya,

Please see Cadw's comments below.

A second request for a Scoping Direction for this proposed development has been submitted. The original scoping report remains valid as the function, scale, dimensions, and footprint of the Proposed Development remain the same but, the request seeks further comments on the following matters:

- Changes to the proposed development
- The approach to topics scoped in within the Scoping Direction
- Areas of disagreement and further clarification sought on topics scoped out within the Scoping Direction

The changes to the proposed development will not alter the methodologies that will need to be followed to determine its effect on the historic environment and therefore our previous advice remains valid. No areas of disagreement or requiring clarification in regard to the scoping of the historic environment chapter of the EIA have been identified.

kind regards
Jenna

From: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>
Sent: 18 November 2024 17:33
Subject: FW: EIA Scoping Direction Addendum Consultation - DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP - due 26/11/2024

Dear consultees,

The agent has provided additional plans to support their scoping request. The agent has advised that the drawings have been updated and further refined from those submitted 30 May 2024 with the original scoping request. Please note that the general arrangement and elevation drawings have been updated, however the dimensions and footprint of the physical development remain the same.

Additional Plans:

- 2024-11-18 - EIA Scoping Request - Drawing 1 Rev A Existing General Arrangement
- 2024-11-18 - EIA Scoping Request - Drawing 2 Rev A Proposed Arrangement
- 2024-11-18 - EIA Scoping Request - Drawing 3 Proposed CHP Facility
- 2024-11-18 - EIA Scoping Request - Drawing 4 Proposed CHP Feedstock Storage and Processing

From: [Evans-Snarr, Richard \(EET - Transport and Digital Connectivity - Network Management Division\)](#)
To: [PEDW – Seilwaith / Infrastructure](#)
Subject: RE: EIA Scoping Direction Addendum Consultation - DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP
- due 19/11/2024
Date: 13 November 2024 16:58:25

Annwyl PEDW,

Thank you for the opportunity to comment on the DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP application.

The developer has noted that a Transport Assessment will be provided, Welsh Government Development Control would encourage early engagement with WG DC and suggest they use the free service of pre-planning advice which can simplify the process if used. We re-issue our standard generic scoping information (below) which can greatly assist developers and look forward to agreeing the scoping document before assessing the Transport Assessment.

Dear Developer,

Please find below our standard generic briefing scope requirements for a Transport Assessment (TA) for a range of different development. The scope is quite generic and extensive to cover all aspect of all types of development. The developer must review the scope and suggest alterations (if any) to align specifically with the proposed development they wish to bring forward, which must be agreed in writing prior to production with the Strategic Road Network Highway Authority (SRNHA) via the email NorthandMidWalesDevelopmentControlMailbox@gov.wales . If the development does not merit a TA, a Transport Statement (TS) might be acceptable, however, this must also be to the written approval of the Strategic Road Network Highway Authority (SRNHA) prior to production. The following is the starting position for any assessment or statement. Developers must also liaise with the highway authority for the county roads whom may have different requirements to the Strategic Road Network Highway Authority (SRNHA).

Please note that **failing to consult fully** with the **Strategic Road Network Highway Authority (SRNHA)** at specific points in the process **as directed** will **delay a review** and/or **invalidate works** executed:

1. As a minimum the TA study area must include classified counts at the below agreed junctions and include surveys (including queue lengths) of the junctions on two separate days. Surveys periods must be agreed in writing with the SRNHA prior to execution and generally be carried out in a neutral month (unless specifically agreed in writing with the SRNHA prior to execution). The surveys must be undertaken on suitable days and at suitable times that the development will impact the highway network (individual developments must gain written approval from SRNHA of their proposals prior to execution). As an example, residential developments would require surveys in the following form; Tuesday one week and Thursday on a separate week (all junctions to be surveys on individual days i.e. Junctions A, B, C, D and E on week one and Junctions A, B, C, D and E on week two). Manual turning counts should be conducted at 15 minute intervals to identify relevant highway network peak periods and should cover at least an additional 45 minutes either side of assumed peak times when surveys are executed e.g. if a peak period of 8:30 to 9:30 was assumed, minimum survey period on site should be 7:45 to 10:15.
 - a. Junction A;
 - b. Junction B;
 - c. Junction C;
 - d. Junction D; and

e. *Junction E.*

2. *24 hours automatic traffic counts (ATC) using loop detection (or similar approved) must be carried out at locations to be agreed in writing by the SRNHA (prior to installation) to supplement and validate the traffic survey data from section one. Surveys periods must be agreed in writing with the SRNHA prior to execution and generally be carried out in a neutral month on a number of highways within the study area over a period of circa three weeks to provide supplementary traffic data for the proposed development for analysis by the SRNHA. The ATC must also gain speed survey information along with vehicle classification data (please see notes at end of this scope for further information). ATC information should also be used to establish peak periods of the highway network as well as establish and review off-peak periods against development traffic as greater impact on the existing highway network from development related traffic could be at different period to that assumed. If ATC are carried out in a neutral month, the developer should also carry out additional surveys during a holiday period, as agreed in writing by the SRNHA, for a minimum period of 7 complete days for comparison purposes.*
3. *24 hours automatic traffic counts (ATC) using loop detection (or similar approved) must be carried out at the junction mouth of a similar local sized existing development to provide local data to inform persons of the possible traffic generated by a development, this will also be valuable to ratify the multi-modal trips calculated using data bases that could be generated by the proposed development. On sensitive sites, additional ATC may be required to further assist with the distribution and assignment of the vehicular trips on the local highway network. If the development is an educational establishment, specialist retail etc. local in this context could be in excess of twenty or more miles away from proposed development site. Where there is no local similar development a comparable development next to the Trunk Road elsewhere in Wales must be identified and agreed.*
4. *TA must review year of application (as base assessment, with and without development) along with future assessment year for the detailed junction capacity assessment of year of application + 10 years (as a general principle). Therefore if an application was submitted in 2024 the future assessment year would be 2034. Applicant must propose what growth rates are to be used which the SRNHA must approve in writing prior to use. Applicant must also carry out a sensitivity check due to seasonal traffic growth (percentage increase to be agreed in writing with the SRNHA prior to executing the review).*

5. *Detailed capacity assessments must be carried out on the junctions within the TA study area in both the 'with' and 'without' development scenarios in the suggested future assessment year as well as the year of application (opening year). Electronic base data/drawings for all assessments must be submitted with TA i.e. base survey / speed data for capacity assessments, road width flares etc.*
6. *TA must include a review of the accident record for the most recently-available 5 year period, the developer must propose the study area for written approval from the SRNHA prior to executing this work. The Developer must also include a separate developer prepared safety assessment of the local highway within a specific radius of the development site or on specific route from the development which must consider aspects such as visibility, pinch points and existing non-motorised user network constraints which would assist the SRNHA in reviewing a proposed development impact on the area.*
7. *Privately owned highway boundary features and/or new development works near to the trunk road may have a bearing on road safety. TA must therefore clarify works within this area (minimum of 15m from the trunk road as a guide) along with any trunk road accommodation works required to bring the site forward. The developer will be responsible for a review of the risks this may have on trunk road users and therefore the TA must include a report (risk assessment) in line with Design Manual for Roads and Bridges (DMRB) CD 377. The outcome of this report may show that the developer is to provide a Road Restraint System. When the apparatus is for road safety purpose, it may be delivered through a S278 agreement (inc. commuted sums) and usually be adopted by the Highway Authority. When a review indicates that no system is required on highway grounds, risks of developing next to the trunk road will be for the developer to address within the development, this will include administering supposed risks that future occupiers/owners may have due to the development proximity to a trunk road. TA must include a review of how the development will manage supposed risks in the future once development has been constructed. Welsh Government DMRB CD377 specific processes can be obtained by emailing RRRAP@gov.wales .*
8. *TA must take account of all approved but as yet unbuilt committed developments within the traffic flow calculations of the TA, simple table detailing these traffic flows should be included within TA. Review of the current LDP must also be completed as traffic impacts from allocated land within the LDP, but not yet subject to planning applications, might also need to be broadly included within the TA. The developer must identify these areas for discussion with the Highway Authority to agree in writing the fully scope.*

9. *The TA must include a detailed description of the existing conditions around the site and the local highway network including highway details of primary routes from development to Trunk Road Highways. Assessment must also highlight if capacity issues or other shortcomings are observed and if traffic associated with the development would pass sensitive locations (e.g. a school, college, industrial estate).*
10. *The TA must include an appraisal of the scheme in the context of current local and national transport planning policy.*
11. *The TA must include a review of the accessibility of the site by non-motorised modes and a review of facilities in the vicinity of the development site (exact area / routes to be agreed in writing by all Highway Authorities prior to production of TA). This will include route assessments of non-motorised users to local schools, amenities, bus stops and the like highlighting locations where existing highway crossing facilities are below current standards or not in place which the majority of non-motorised user traffic generated by the development will use. Review must also take into account **Active Travel Wales Act** Duties/Design requirements along with links to Existing Route Maps and Integrated Network Maps routes (Please review relevant local authority Active Travel maps for further information). Each and every development must work with all Highway Authorities in line with Active Travel Wales Act and provide a lasting legacy to the area to improve non-motorised modes in the area (regardless of distance from development). For further reading see [Active Travel Act guidance | GOV.WALES](#);*
12. *Public Transport Assessment: The TA must review the different public transport available locally to the proposed development site. The facilities available must be clearly labelled on a simple map with a complimentary table details all elements of the service which must include as a minimum: distance from agreed location within the proposed development to a facility (along with maximum distance), what services are available, their frequency, start and end times, at what time would the development generate the highest level of demand for public transport use / indication of anticipated development modal split to confirm demand for public transport etc. Review must identify clear routes to the service link e.g. bus stops/train stations detailing the actual distance to the facility from an agreed location within the proposed development along existing route and not in a direct line over third party land (as agreed with SRNHA). Review must suggest direct route to these facilities identifying any lack of highway crossing facilities to non-motorised users along the proposed routes and/or other hazards/highway safety issues the routes might have which may impact non-motorised users.*

13. *The TA must include a full appraisal of the proposed development and its intended operation, including details of: the level of proposed parking facilities for the proposed development (for mobility scooters, cycles, commercial vehicles, cars, motorbikes, vans etc.), servicing arrangements and swept path analysis plans (as appropriate, including for refuse vehicle and fire tender). Parking numbers, ratio and dimensions/details of facilities must adhere to Active Travel Wales and local authority parking standards, this information must be clearly identified within the TA for transparency.*
14. *A full parking assessment must be supplied, as an appendix, complying with the requirements/specifications detailed in Active Travel Wales and local authority parking standards. Clarity to what the SRNHA will accept as “local facilities” within a sustainability review must be agreed in writing prior to producing a parking assessment, as a guide these facilities will be where persons will regularly visit for a prolonged period, such facilities may include foodstore, schools, large employment areas.*
15. *The TA must include an estimate of the number of multi-modal trips generated by the proposed use of the site, along with the distribution and assignment of the vehicular trips on the local highway network to the trunk road. Trip rates may be based on TRICs-based developments of a similar scale and in a similar location to that proposed (Trip rates proposed by applicant must be approved by SRNHA prior to use as the authority may require a number of proposed data to determine the rates to be used within this TA, distribution proposals must also be approved prior to development of the TA along with 85th Trip rate data use). The TA should also include the production of a ‘Transport Implementation Strategy’ (TIS) for the development complying with TAN 18. This should set objectives and targets relating to managing travel demand for the development and set out the infrastructure, demand management measures and financial contributions necessary to achieve them. The TIS should set a framework for monitoring the objectives and targets, including the future modal split of transport to development sites.*
16. *If any off-site works are required to make the development satisfactory in highway terms, the TA must identify them and put forward suitable plans for consideration as well as cost estimate for their design, construction, supervision of works and administration of the contracts.*
17. *Schemes with obvious long term construction periods, where it is probable that: road closures; lane closures; contraflow working; temporary traffic signals; or any other traffic management are required; must form part of the assessment as a standalone section. It is no longer acceptable for temporary*

traffic management, clearly known to be required in advance of the construction, not to be reviewed and risk assessed appropriately at an advance stage of a scheme development where it could impact the traffic on the network. High level review of the network with worse case traffic management scenarios evaluated will enable disruption to the strategic road network to be minimised and when required accommodation works provided (in advance) as well as enabling the development to minimise disruptions to local residents and businesses. Collation of multiple traffic surveys, at the appropriate times, at an advance stage of any development will serve as a benefit to all parties and is the only way for traffic patterns/volume knowledge of the specific area of the network to be gained. The scheme development must take responsibility for this stated element, this advance works will also benefit the Principal Contractors who can take ownership of the assessments and refine as required. Developers who historically wish to condition that the administration of the whole traffic management element of a development at a future date fails to address known advance risks.

18. Refuse Collection: Confirmation from LA on refuse collection must also be clarified as well as waste/recycling bin collection location details, this is because some LPA have SPG's similar to: "Refuse Collection, Waste Storage and Collections in New Developments - Developer must note that "in new developments, recycling and refuse collection vehicles will not reverse into/from or along a highway to undertake collections. Where collection vehicles do have to enter a development, there must be sufficient on site turning circles or hammerheads to allow safe manoeuvring and exit from the development". Under Section 46(4) of the Environmental Protection Act, 1990, the Council has specific powers to stipulate where receptacles must be placed for the purpose of collecting and emptying and the steps to be taken by occupiers of premises to facilitate the collection of waste, such as transporting receptacles to the collection point and keeping all access and carriageways free of obstruction. It should be noted that the Council's policy for waste collection is to collect waste and recycling at the boundary of a property at the nearest kerbside. The kerbside is defined as the nearest adopted highway to the property (typically the pavement or highway verge), where the safe storage of waste containers can take place. The collection point for householders with private roads will be the nearest safe storage location point where their road meets the adopted highway or at an alternative collection point agreed by the Council. The precise location of any collection point will be the Council's decision, as specified in the Environmental Protection Act, 1990."

19. Construction Traffic and Site Compound: the following will be required for a development if it gains planning approval and may be advantageous to include within a TA - a review of the impact of the construction traffic on the

surrounding highway traffic noting when peak periods will occur and what traffic will be generated by the construction works (as a whole and during peak periods). The review must also consider the proposed site compound location ensuring it's appropriately located for its intended use along with a parking assessment to ensure no vehicles connected with the development park on the public highway/local streets, assessment must also detail: amount of parking required and details of oversized parking bays to accommodate likely construction vehicles such as large vans etc. Site compound must also have appropriate turning facilities for vehicles to ensure that they can enter and exit in a forward gear (if applicable).

20. Monitoring: If granted planning permission, monitoring by the developer and future occupiers is an important tool to allow highway authorities to check how accurate assumptions stated within the TA were and whether improvements in future TA's are required. The TA must therefore detail how this proposed development will survey traffic generated by this development and how it is to report the findings to the Local Authority (traffic to include all modes of transport). This review must be carried out at two intervals after completion of construction of the development, the survey period will be six months and one year after said completion in the next available neutral month (as agreed in writing with the SRNHA). For vehicle movement surveys, the SRNHA would require that 24 hours automatic traffic counts (ATC) are installed on the access road into the development and on both approach ends of the main highway so that traffic approaching from either directions are recorded (speed/classification etc.). ATC should be installed for a minimum of two week and be carried out using loop detection or similar approved system (exact locations and number of location to be agreed in writing with SRNHA, report findings and data to be provided in electronic format to the SRNHA).

21. Supplementary plans must also be included as appendices to the TA, these shall be detailed as follows:

- a. Plans showing the geometric measurements/dimensions and visibility data inputted into any capacity assessments, i.e. widths of carriageways/lanes at specific points, width of other lanes/hatched areas etc., flare information, forward visibility, ghost island details, visibility splays left/right and any other highway details measured/calculated which have been used within the capacity assessment (note must be provided to detail origin of plans i.e. topographically surveyed or other);*
- b. Design of proposed highway access ensuring it complies with Active Travel Wales Act e.g. most new simple junction development accesses will need to comply with a non-segregated layout broadly complying with DE602 (or similarly approved by all Highway Authorities);*

- c. *Visibility splay drawing detailing: junction and private accesses visibility splays, forward visibility splay, pedestrian crossing visibility splays etc. in both the vertical and horizontal plane;*
- d. *All detail designs must include Swept Path analysis showing all vehicles can execute manoeuvres at turning locations, tight corners or other locations agreed with the all Highway Authorities [N.B. swept path analysis must show that vehicles can carry out required manoeuvres with a minimum horizontal clearance of 500mm between the outer body of the vehicle and any object such as kerbs/street furniture/parked vehicles/boundaries (invisible or physical [such as walls/fences/hedges]) and alike to allow for different driving styles and future vehicle size enlargement];*
- e. *Plan detailing the vehicle parking locations showing the dimensions of parking facilities proposed e.g. 2.6m x 4.8m for standard parking bays, garages adhering to parking standards must also be highlighted (minimum internal clearance of 3m x 6m with appropriate driveway of same dimension) along with visitor parking arrangement. Parking bays at the end of a row of parking bays or bays next to walls/structures/obstructions, which are greater in height than 150mm above the parking bay surface level, must be increased in width when compared to a standard bay width of 2.6m. The reason for this is that shared space between standard bays, which allow vehicle doors to open to a greater extent, can't be achieved next to walls/structures/obstructions (exact bay widths will be subject to swept path analysis as vehicle approach roadway width will also impact the requirement). Cycle parking, visitor spaces (vehicles) and motorcycle bays must also be detailed. Developers must be aware that the Highway Authority will not accept parking provision of a new development that does not comply with the parking bay dimensions, parking provision underneath structures/buildings must comply with requirements regardless of structural supports, it is vitally important that parking layout/design is an integral part of the design and not an afterthought to a development. Where used, excessive lengths of series (nose to tail) parking provision should be minimised. Within residential developments with turning heads, parking provision of the immediate dwellings accessed from a turning head must meet or exceed parking requirements to minimise the risk of residents parking within turning facilities and blocking their use.*
- f. *Drawing detailing where waste bins/recycling apparatus are to be stored within individual unit/plot boundaries on waste collection days and non-collection days as well as communal waste bin/recycling apparatus storage areas.*

To ensure that a comprehensive review of the TA can be carried out in a timely manner, each TA submitted must be done in the following format and be available electronically to the SRNHA, documents must be provided in their original state i.e. in word, excel, etc. as well as in PDF format:

- Electronic PDF of TA and appendices (not scanned copy);*
- Raw electronic information for traffic count data etc. in both PDF and original compiled software i.e. excel;*
- Electronic copy of topographical surveys (CAD);*
- Electronic copy of capacity assessment input data file(s) carried out by software such as LinSig, Picady, Arcady etc.*

General Notes to Developers:

The aims of a TA / TIS are to:

- understand the transport impacts of the development;*
- clearly communicate the impacts to assist the decision making process;*
- demonstrate the development is sited in a location that will produce a desired and predicted output (for example in terms of target modal split);*
- mitigate negative transport impacts through the design process and secured through planning conditions or obligations;*
- maximise the accessibility of the development by non-car modes (Active Travel Wales Act);*
- contribute to relevant development plan and RTP objectives relating to accessibility of services and modal share.*

SRNHA scheme/development specific notes to be included here at the relevant time.....

Traffic Data should reflect the normal traffic flow conditions on the transport network (e.g. non-school holiday periods, typical weather conditions etc.) in the vicinity of the site, and should be valid for the intended purposes. It should also take account of holiday periods in tourist areas, where peaks could occur in periods that might normally be considered non-neutral. The recommended periods for data collection are spring and autumn, which include the neutral months of April, May, June, September and October as described in Design Manual for Roads and Bridges (DMRB) CA 185. Please note that different school term times, Easter Holidays etc. could further impact neutral months and no traffic data should be collected a week

either side of these times unless otherwise agreed with the SRNHA. Prior to collecting Traffic Data, the applicant must agree the survey requirements in writing with the SRNHA.

Speed Surveys, when required, must be carried out to calculate the 85th percentile speeds of a highway if a proposed access visibility splays do not adhere to the posted speed limit requirements of a road as detailed in Design Manual for Roads and Bridges (DMRB). Speed surveys might also be required to provide information to designers/road safety auditors. Speed surveys must be carried out in neutral months as detailed in above paragraph with measurements taken at both ends of the scheme so that traffic approaching from both directions are recorded. Surveys must be carried out by loop detectors (or similar approved) for a minimum period of 7 days with the raw data issued to the SRNHA for scrutiny, in electronic format (excel), before visibility splay requirements are determined. In addition to the above please ensure you liaise with the SRNHA prior to installing any loop detection (or similar approved) systems to ensure that their location is to SRNHA approval i.e. not too far or too close to a proposed development site access, not within other junction locations which could adversely misrepresent traffic speeds in normal free flowing traffic conditions or not on a section of carriageway affected by its layout (bend, blind summit or other features). Speed surveys should generally be carried out at two locations, either side to an access, at a distance equating to the stopping sight distance for the posted speed limit of the road. If an access is proposed within 150m of a speed limit termination/change location the Highway Authority may request a speed survey regardless.

Shared Footway/Cycleway: To encourage person to travel by means other than by motor vehicles, any new development must have a spine footway/cycleway route in Line with Active Travel Wales Act (determined by Local Authority). The shared route provision must comply with Active Travel Wales requirements and if the route is next to a vertical feature of a certain height, the width may need to be increased.

Access / Junction Visibility Splays: The minimum visibility distances available for vehicles emerging from a proposed access / junction shall be “y” metres in each direction at a height of 1.05 metres, measured to a point 0.26 metres above the nearer running edge of the main carriageway. These visibility distances shall be available from a point 2.4m metres from the nearer running edge of the main road, measured along the centreline of the access road / junction, to all intervening points along the running edge of the main carriageway. Junction visibility measured from 15m from the running edge of the main carriageway is also required along with visibility to the back of the footway or shared route. On bends, “X” to “V” visibility splay will also be required. The whole of all visibility splay envelopes so formed shall be free of any growth or obstruction, which would interfere with the minimum visibility

requirements. For full and up to date specifications see current Design Manual for Roads and Bridges (DMRB) documents.

Internal Highway Design: The Highway Authority would encourage developers/designers to liaise with the Highway Authority prior to designing the scheme to ensure that road safety is taken into account before the start of the design process, this will ensure that a constant approach is provided to schemes which should improve designs and speed up the review process as scheme will take into account all of the Highway Authority requirements. A simple review by the designer to ensure that required visibility splays, in both horizontal and vertical planes, are provided and clearly shown on a drawing along with a review to ensure that the design does not propose any blind corners to motorists or non-motorised users would improve designs and reduce comments from the Highway Authority. Please also note that private vehicle accesses serving a dwelling must also have pedestrian and cyclist visibility splays with footway or footway/cycleways, private vehicle accesses onto footways will require visibility splays measure either side of an access of 2.4m x 2.4m (i.e. 45o splays both sides) while private vehicle accesses onto pavements designated for cycling must also have visibility splays of 2.4m in the “x” direction by 23m in the “y” direction.

Important Link to Other Documents:

Llwybr Newydd: [Llwybr Newydd: the Wales transport strategy 2021 | GOV.WALES](#)

ATW Design Guidance: [Active Travel Act guidance | GOV.WALES](#)

ERM Maps: See local authority website

INM Maps: See local authority website

Parking Standards: See local authority website

All developers must digest the above details in full and submit their scope, based on the above, before carrying out any survey works. The Highway Authority is open to discuss any of the above requirements before the application moves forward towards a full planning application.

For 1C Packs, Pre-Planning Advise, further information or to submit a specific scope for a development please contact us through the following email:

NorthandMidWalesDevelopmentControlMailbox@gov.wales

+++++

From: [Grace Lewis](#)
To: [PEDW – Seilwaith / Infrastructure](#)
Subject: CAS-03463-R2W9C2 - Land within the existing Kronospan Facility, Maesgwyn Farm, Chirk, LL14 5NT
Date: 19 November 2024 12:03:58
Attachments: [image001.png](#)

OFFICIAL



Network Rail
1st Floor
Bristol Temple Point
Bristol
BS1 6NL

My Ref: P/TP24/180

Your Ref: CAS-03463-R2W9C2

Date: 19 November 2024

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

APPLICATION NO: CAS-03463-R2W9C2

PROPOSAL: Proposed low carbon combined heat and power (CHP) facility on land at the existing Kronospan Facility, Chirk, North Wales

LOCATION: Land within the existing Kronospan Facility, Maesgwyn Farm, Chirk, LL14 5NT

Dear Sir/Madam,

Thank you for your email dated **22 October 2024** together with the opportunity to comment on this proposal.

Network Rail has no objections in principle to the details submitted. Any works on this land will need to be undertaken following engagement with Asset Protection to determine the interface with Network Rail assets, buried or otherwise and by entering into a Basic Asset Protection Agreement, if required, with a minimum of 3 months notice before works start. Initially the outside party should contact assetprotectionwales@networkrail.co.uk.

HEAPING, DUST AND LITTER

There is the potential for dust clouds and rubbish created from the processing at the site affecting the railway signal sighting. Therefore, adequate measures for preventing dust and rubbish blowing onto Network Rail property are to be in operation.

LIGHTING

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway.

Yours Sincerely,

Grace Lewis

Town Planning Technician Wales and Western
Network Rail

Temple Point, Redcliffe Way, Bristol, BS1 6NL

E [REDACTED]

www.networkrail.co.uk/property

The content of this email (and any attachment) is confidential. It may also be legally privileged or

From: [Grace Lewis](#)
To: [PEDW – Seilwaith / Infrastructure](#)
Subject: CAS-03463-R2W9C2 - Land within the existing Kronospan Facility, Maesgwyn Farm, Chirk, LL14 5NT
Date: 03 December 2024 10:45:35
Attachments: [image001.png](#)

OFFICIAL



Network Rail
1st Floor
Bristol Temple Point
Bristol
BS1 6NL

My Ref: P/TP24/180
Your Ref: CAS-03463-R2W9C2

Date: 3 December 2024

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

APPLICATION NO: CAS-03463-R2W9C2

PROPOSAL: Scoping EIA for Proposed low carbon combined heat and power (CHP) facility on land at the existing Kronospan Facility, Chirk, North Wales

LOCATION: Land within the existing Kronospan Facility, Maesgwyn Farm, Chirk, LL14 5NT

Dear Sir/Madam,

Thank you for your email dated **22 October 2024** together with the opportunity to comment on this proposal.

Network Rail has no objections in principle to the details submitted.

Any works on this land will need to be undertaken following engagement with Asset Protection to determine the interface with Network Rail assets, buried or otherwise and by entering into a Basic Asset Protection Agreement, if required, with a minimum of 3 months notice before works start. Initially the outside party should contact assetprotectionwales@networkrail.co.uk.

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arrangements on the railway.

Yours Sincerely,

Grace Lewis

Town Planning Technician Wales and Western
Network Rail

Temple Point, Redcliffe Way, Bristol, BS1 6NL

E [REDACTED]

www.networkrail.co.uk/property

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If you have received this email by mistake, please notify us by emailing the sender, and then delete the email and any copies from your system.

Liability cannot be accepted for statements made which are clearly the sender's own and not made on behalf of Network Rail.

Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, Waterloo General Office, London, SE1 8SW.

From: Shirley Rance **On Behalf Of** NSIP Applications
Sent: 25 October 2024 07:50
To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>
Cc: NSIP Applications <NSIP.Applications@hse.gov.uk>
Subject: DNS- EIA Scoping Direction Addendum Consultation - DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP - due 19/11/2024 - HSE Response dated 25/10/2024

Dear Ms Leck,

Thank you for your email dated 22 October 2024 consulting HSE on the Proposed Kronospan Low Carbon CHP - Development of National Significance (DNS).

Please find HSE's advice below.

HSE's land use planning advice – CEMHD5

There is no requirement to update CEMHD5's original consultation response dated 31/5/2024 – advice still remains the same.

Explosives sites

There are no licensed explosive sites in the vicinity so HSE has no comment to make in this regard.

Regards

NSIP Consultation Team

Health and Safety Executive

Shirley Rance | Business Support Team

Health and Safety Executive | CEMHD - DBST

NSIP.Applications@hse.gov.uk



[REDACTED]

From: AP Planning HD <APPlanning@hdcymru.co.uk>

Sent: 08 November 2024 13:01

To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>

Subject: FW: EIA Scoping Direction Addendum Consultation - DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP - due 19/11/2024 HD Ref P-240603-43803

ST Classification: OFFICIAL PERSONAL

Good Afternoon

Please note we have no change to the waste water comments however have now added Clean Water comments

With reference to the above planning application the Company's observations regarding sewerage are as follows.

The above site is out of Hafren Dyfrdwy's waste water area, and therefore we have no comment to make regarding drainage.

IMPORTANT NOTE: This response only relates to the public waste water network and does not include representation from other areas of Severn Trent Water/Hafren Dyfrdwy, such as the provision of water supply or the protection of drinking water quality.

Clean Water Comments

We have apparatus in the area of the planned development, the developer will need to contact Severn Trent Water, New Connections team as detailed below to assess their proposed plans for diversion requirements.

To request a water map please follow the link, <https://www.stwater.co.uk/building-and-developing/estimators-and-maps/request-a-water-sewer-map/> scroll down the page to view the link:

Please visit www.digdat.co.uk

You will need to register on the website and then you will be able to search for your chosen location and get an instant quote online. For more information you can [view](#)

[Digdat's user guide\(opens in a new window\).](#)

Please look at the [district area supply plan \(PDF\)\(opens in a new window\)](#) to check that your site is within the Severn Trent boundary before requesting an underground asset map.

Any correspondence and diversion applications are to be submitted through New Connections the relevant form can be found on the Severn Trent website, please complete the form as fully as possible.

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/diversion-of-water-assets-application/>
https://www.stwater.co.uk/content/dam/stw/stw_buildinganddeveloping/Diversion-of-a-Severn-Trent-Water-main.pdf

Information on diversion application charges can be found at

https://www.stwater.co.uk/content/dam/stw/stw_buildinganddeveloping/new-connections/final-st-charging-arrangements-24-25.pdf

Scroll down the “**New Connections Charging**” document - 1 April 2024 to 31 March 2025.

Please attach all the relevant documentation and relevant fee and return the form to:

Severn Trent Water Ltd

PO Box 5311

Coventry

CV3 9FL

Telephone: 0800 707 6600

Email: new.connections@severntrent.co.uk

Should you require any further information please contact us on email below.

Kind regards,

Asset Protection Team

Asset Protection
Asset Strategy and Planning
Chief Engineer
Hafren Dyfrdwy

Email: APPlanning@hdcymru.co.uk

From: PEDW.Infrastructure@gov.wales <PEDW.Infrastructure@gov.wales>

Sent: 22 October 2024 16:07

Subject: EIA Scoping Direction Addendum Consultation - DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP - due 19/11/2024

Caution: This is an external email originating outside Severn Trent.
Think before you click on links or open attachments.

Dear Consultees,

Please find attached a consultation letter regarding an EIA Scoping Direction request for DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP. We consulted you earlier this year, and subsequently issued a Scoping Direction for this project on 31/07/2024. This is a follow up request from the applicant. We intend to deal with this as a Scoping Direction Addendum, which will be read in conjunction with the original Scoping Direction issued in July.

The following information has been submitted with this request:

- 2024-10-15 - From Agent - Scoping Addendum Request
- 2024-10-15 - EIA Scoping Direction Addendum Request - Scoping Clarification Report
- 2024-10-15 - EIA Scoping Direction Addendum Request - Figure 1.1 Statutory Plan
- 2024-10-15 - EIA Scoping Direction Addendum Request - Appendix A Phase 1 Geo-Env Assessment

The above documents, and the EIA Scoping Direction, are available on our [casework portal](#).

In summary, the request seeks further comments on the following matters:

- Changes to the proposed development
- The approach to topics scoped in within the Scoping Direction
- Areas of disagreement and further clarification sought on topics scoped out within the Scoping Direction

We would be grateful for your comments by **Tuesday 19 November 2024**. If you have no comments further to your response to the original scoping request, I would be grateful if you could let us know that is the case.

If you have any queries, please let me know.

From: [AP Planning HD](#)
To: [PEDW – Seilwaith / Infrastructure](#)
Subject: FW: EIA Scoping Direction Addendum Consultation - DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP - due 26/11/2024 HD Ref P-240603-43803
Date: 20 November 2024 14:20:34
Attachments: [2024-10-22 - EIA Scoping Consultation - Kronospan Low Carbon CHP.pdf](#)

ST Classification: UNMARKED

Good Afternoon

With reference to the above scoping consultation, we have no additional comments to make

Kind regards,

Asset Protection Team

Asset Protection
Asset Strategy and Planning
Chief Engineer
Hafren Dyfrdwy
Email: APPlanning@hdcymru.co.uk

From: PEDW.Infrastructure@gov.wales <PEDW.Infrastructure@gov.wales>
Sent: 18 November 2024 17:33
Subject: FW: EIA Scoping Direction Addendum Consultation - DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP - due 26/11/2024

Caution: This is an external email originating outside Severn Trent.
Think before you click on links or open attachments.

Dear consultees,

The agent has provided additional plans to support their scoping request. The agent has advised that the drawings have been updated and further refined from those submitted 30 May 2024 with the original scoping request. Please note that the general arrangement and elevation drawings have been updated, however the dimensions and footprint of the physical development remain the same.

Additional Plans:

- 2024-11-18 - EIA Scoping Request - Drawing 1 Rev A Existing General Arrangement
- 2024-11-18 - EIA Scoping Request - Drawing 2 Rev A Proposed Arrangement
- 2024-11-18 - EIA Scoping Request - Drawing 3 Proposed CHP Facility
- 2024-11-18 - EIA Scoping Request - Drawing 4 Proposed CHP Feedstock

From: [Gavin Lowry](#)
To: [PEDW – Seilwaith / Infrastructure](#)
Subject: NWFRS Response
Date: 21 November 2024 09:23:31
Attachments: [image002.png](#)
[image003.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[Kronospan Carbon Capture Nov 24.docx](#)
Importance: High

Good morning

Good afternoon

A substantive response has been sent for the purposes of Article 23 of the Developments of National Significance (Procedure) (Wales) Order 2016, stating that North Wales Fire & Rescue Service as a specialist consultee (North Wales Fire Authority) has no objection to the proposed development, we refer the applicant to current standing advice provided on the subject of the consultation.

We would suggest a review of the water supplies feeding the site is undertaken to ensure they are sufficient for the proposed new buildings, this should be covered in any site surveying as part of the works. We would also signpost to the emergency vehicle access requirements as stated in Approved Document B.

Kind regards,



Gavin Lowry

Rheolwr Cydymffurfio Ardal y Dwyrain / East Area Compliance Manager

Sir y Fflint a Wrecsam / Flintshire & Wrexham

Rheolwr Cefnogi Gorsaf Dân Bwcle / Station Support Officer for Buckley Fire

Station

Gwasanaeth Tân ac Achub Gogledd Cymru | North Wales Fire and Rescue Service



Rydym yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg - byddwn yn ymateb yn gyfartal i'r ddwy ac yn ateb yn eich dewis iaith heb oedi.

We welcome correspondence in Welsh and English - we will respond equally to both and will reply in your language of choice without delay.

Gwnewch yn siŵr eich bod yn profi'ch larwm mwg yn rheolaidd. Os nad oes gennych larwm, neu os ydy'ch larwm wedi torri, ffoniwch 0800 169 1234 neu ewch i www.northwalesfire.gov.wales am gyngor ynglŷn â beth i'w wneud nesaf.

Please make sure that you regularly check your smoke alarm. If you do not have one, or find that the one that you do have is not working, call 0800 169 1234 or visit www.northwalesfire.gov.wales for advice on what to do next.

Peidiwch ag argraffu'r e-bost hwn oni bai fod hynny'n wirioneddol anghenrheidiol /

Please don't print this e-mail unless you really need to.

Cyfrinachedd: Mae'r neges e-bost hon ac unrhyw ffeiliau a drosglwyddir gyda hi, yn breifat ac fe allent fod yn cynnwys gwybodaeth sy'n gyfrinachol neu'n gyfreithiol-freintiedig. Os byddwch yn derbyn y neges hon trwy gamgymeriad, a fydddech mor garedig â rhoi gwybod inni a chael gwared arni o'ch system ar unwaith.

Ymwadiad: Fe allai e-bostio trwy'r We fod yn agored i oedi, rhyng-gipio, peidio â chyrraedd, neu newidiadau heb eu hawdurdodi. Felly, nid yw'r wybodaeth a fynegir yn y neges hon yn cael cefnogaeth GTAGC oni bai fod cynrychiolydd awdurdodedig, yn annibynnol ar yr e-bost hwn, yn hysbysu ynghylch hynny. Ni ddylid gweithredu o ddibynnu ar gynnwys yr e-bost hwn yn unig.

Monitro: Bydd GTAGC yn monitro cynnwys e-byst at ddiben atal neu

Dear PEDW,

The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 and the Developments of National Significance (Procedure) (Wales) Order 2016

DEVELOPMENT PROCEDURE (CONSULTEES) (WALES) (MISCELLANEOUS AMANDMENTS) ORDER 2021 – FIRE AND RESCUE AUTHORITIES

Ref;- DNS CAS-03463-R2W9C2 - Kronospan Low Carbon CHP

I acknowledge receipt of the notification to the North Wales Fire and Rescue Authority in relation to the above application.

As a specialist consultee the Fire and Rescue Authority would wish the following comments to be brought to the attention of the planning committee/applicant. It is important that these matters are dealt with early on in any proposed development; -

- The Fire Authority has no comment to make on access for fire appliances or water supplies.
- The Fire Authority has no objection to the proposed development and refers the Local Planning Authority to any current standing advice by the Fire Authority about the consultation.

The developer should consider the need to provide adequate water supplies and vehicle access for firefighting purposes on the site and general guidance on this matter is given in the attached Appendix and the following links:

<https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-of-water-for-firefighting-3rd-edition-jan-2007/>

<https://www.ukfrs.com/index.php/promos/16847>

Furthermore, the applicant should be advised to contact the Local Authority Building Control Department, which is the responsible authority, when determining issues concerning means of warning and escape, internal fire spread (linings and structure), external fire spread, access and facilities for the Fire and Rescue Service, in accordance with the 2007 version of Approved Document B (Wales).

The plan/s has been retained for record purposes.

Yours faithfully

G. K. Lowry

Advice on Water Supplies

1. WATER SUPPLIES FOR FIREFIGHTING

The existing output of the statutory water supply network may need to be upgraded in certain parts of the local plan area to care for firefighting needs of new developments. It is recommended that this provision be a condition of planning consent.

Reference to the National Guidance Document on the Provision of Water for Fire Fighting 2007.

Access to Open Water Supplies

Where development of water-front sites takes place, the need for permanent and unobstructed access for firefighting appliances to the water should be made a condition of any planning consent.

Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure access for fire pumping appliances is satisfactory.

1.1. HOUSING

Minimum main size 100 millimetres. Housing developments of units of detached or semi-detached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any hydrant on the development.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.2. TRANSPORTATION

Lorry/Coach Parks - Multi-Storey Car Parks-Service Stations

Minimum main size 100 millimetres. All of these amenities should have a water supply capable of delivering a minimum of 25 litres per second through any hydrant on the development or within a vehicular distance of 90 metres from the complex.

1.3. INDUSTRY

In order that an adequate supply of water is available for use by the Fire and Rescue Authority in case of fire, it is recommended that the water supply infrastructure to any commercial industrial estate is as follows:

Light Industrial/Commercial

Up to one hectare, 20 litres per second - Minimum Main Size 100 millimetres

Up to two hectares, 35 litres per second - Minimum Main Size 150 millimetres

High Risk Industrial

Up to three hectares 50 litres per second - Minimum Main Size 150 millimetres

Over three hectares, 75 litres per second - Minimum Main Size 150 millimetres

In rural areas it may not be possible to provide sufficient mains water. To overcome this, static or river supplies would be considered on site if they are capable of supplying the above flow rates for at least one hour.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements, as high-risk premises may require a greater flow.

1.4. SHOPPING, OFFICES, RECREATION AND TOURISM

Commercial developments of this type should have a water supply capable of delivering a minimum of 20 to 75 litres per second to the development site. The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.5. EDUCATION, HEALTH AND COMMUNITY FACILITIES

Village Halls

Should have a water supply capable of delivering a minimum of 15 litres per second through any hydrant on the development or within a vehicular distance of 100 metres from the complex.

Primary Schools and Single Storey Health Centres

Should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

Secondary Schools, Colleges, Large Health and Community Facilities

Should have a water supply capable of delivering a minimum of 35 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

1.6. DISTANCES BETWEEN FIRE HYDRANTS

The distance between fire hydrants should not exceed the following:

Residential areas	-	200 metres
Industrial Estates	-	150 metres
Town Centre Areas	-	90 metres
Commercial (Offices & Shops)	-	100 metres
Residential Hostels	-	Adjacent to access
Hotels	-	Adjacent to access
Institutional (Hospitals & Old Persons Home)	-	Adjacent to access
Old Persons Home	-	Adjacent to access
Educational (Schools & Colleges)	-	Adjacent to access

1.7. CONCLUSION

Developers should hold joint discussions with the relevant Water Authority or the Environmental Agency and the Fire and Rescue Authority to ensure that adequate water supplies are available in case of fire.

The Fire and Rescue Authority reserve the right to ask for static water supplies for firefighting on site, as a condition of planning consent, if the supply infrastructure is inadequate for any given risk.



Defence Infrastructure Organisation

Andy White
Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire WS14 9PY

Your reference: CAS-03463-R2W9C2

E-mail: DIO-safeguarding-statutory@mod.gov.uk

Our reference: DIO10063989

www.mod.uk/DIO

Tanya Leck
Planning and Environment Decisions Wales
Welsh Government

21 November 2024

By email only

Dear Tanya,

MOD Safeguarding – Low Flying Area 7 (LFA7)

Proposal: EIA Scoping Report - Kronospan Low Carbon Combined Heat and Power Facility – EIA Scoping Direction Addendum Consultation Additional Information.

Location: Kronospan Limited manufacturing facility in Chirk, North Wales.

Grid Ref: Approx. 328521, 338507

Thank you for consulting the Ministry of Defence (MOD) on the above development with additional information supplied by the agent.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System. This letter confirms and updates the MOD Safeguarding position.

It is understood that the additional information does not amend either the dimensions or footprint of the proposed development.

The MOD previously responded to consultation on this application with a letter to Planning and Environment Decisions Wales dated 20 August 2024.

The consultation related to a screening/scoping opinion for the construction of a Low Carbon Combined Heat and Power (CHP) facility on land at the existing Kronospan Facility. The proposed

development would have the capacity to generate up to 30 megawatts (MW) of electricity and 125MW of thermal energy for use in the existing manufacturing processes at the existing Kronospan Facility. Plans indicate that the development would include a stack of 95m Above Ground Level (AGL).

Low Flying

In the scoping Report (Sect 3.13.1) it was written that, "It is not proposed to light the stack as it would not exceed 150m, the height at which aviation warning lights are a statutory requirement".

In this case the development falls within Low Flying Area 7 (LFA 7), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of a stack at 95m AGL in this location has the potential to introduce a physical obstruction hazard to military aircraft engaged in low level training activities conducted in this locality.

To address this impact and given the location and scale of the development within LFA 7, the MOD would request that conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. Suggested condition wordings are set out in Appendix A.

Summary

At this scoping stage, MOD representations are limited to the principle of the development only.

In summary the MOD position remains extant, the MOD has concerns and requests that the MOD should be consulted at all future stages for this proposed development to complete a full detailed safeguarding assessment.

The MOD must emphasise that the advice provided within this letter is in response to the previous information supplied by the developer and information detailed in the developer's Additional Plans:

- 2024-11-18 - EIA Scoping Request - Drawing 1 Rev A Existing General Arrangement
- 2024-11-18 - EIA Scoping Request - Drawing 2 Rev A Proposed Arrangement
- 2024-11-18 - EIA Scoping Request - Drawing 3 Proposed CHP Facility
- 2024-11-18 - EIA Scoping Request - Drawing 4 Proposed CHP Feedstock Storage and Processing
- 2024-11-18 - EIA Scoping Request - Drawing 5 Rev A - Proposed Site Elevations
- 2024-11-18 - EIA Scoping Request - Drawing 6 Rev A Proposed Plan and Elevations
- 2024-11-18 - EIA Scoping Request - Drawing 7 CHP Facility Plan
- 2024-11-18 - EIA Scoping Request - Drawing 8 Elevation A-A
- 2024-11-18 - EIA Scoping Request - Drawing 9 Elevation B-B
- 2024-11-18 - EIA Scoping Request - Drawing 10 Elevation C-C

Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Yours sincerely

Andy White

Andy White
Assistant Safeguarding Manager

(Appendix A enc)

Appendix A

Condition - Aviation Lighting

Prior to commencing construction of any stack, or deploying any construction equipment or temporal structure(s) 50 metres or more in height (above ground level) the undertaker must submit an aviation lighting scheme for the approval of the planning authority in conjunction with the Ministry of Defence defining how the development will be lit throughout its life to maintain civil and military aviation safety requirements as determined necessary for aviation safety by the Ministry of Defence.

This should set out:

- a. details of any construction equipment and temporal structures with a total height of 50 metres or greater (above ground level) that will be deployed during the construction of the stack and details of any aviation warning lighting that they will be fitted with;
and
- b. the location and height of the stack identifying the position of the lights on the stack; the type(s) of lights that will be fitted and the performance specification(s) of the lighting type(s) to be used.

Thereafter, the undertaker must exhibit such lights as detailed in the approved aviation lighting scheme. The lighting installed will remain operational for the lifetime of the development.

Reason for condition.

To maintain aviation safety.

Condition - Aviation Charting and Safety Management

The undertaker must notify the Ministry of Defence, at least 14 days prior to the commencement of the works, in writing of the following information:

- a) the date of the commencement of the erection of the stack;
- b) the maximum height of any construction equipment to be used in the erection of the development.
- c) the date the stack is brought into use;
- d) the latitude and longitude and maximum height of the stack.

The Ministry of Defence must be notified of any changes to the information supplied in accordance with these requirements and of the completion of the construction of the development.

Reason for condition.

To maintain aviation safety.