Town and Country Planning Act 1990

Appeal by Kronospan Ltd: Raw Board Store, Chirk

APPEAL STATEMENT ON CULTURAL HERITAGE

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on behalf of

Kronospan Ltd

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1. Introduction

1.1 In August 2017, Kronospan Ltd applied to Wrexham County Borough Council ('the Council') for planning permission to construct a raw board store on its existing manufacturing site in Chirk (P/2017/0700). The proposed building would be located within the footprint of the existing manufacturing facility and its construction would involve the vertical extension of the existing warehouse buildings. It would be 22.9m in height, compared to the existing building which is 11.5m in height. The building extension would be 123m in length and 30m in width. It would be used to provide an interim storage facility between the raw board production area and the melamine facing finishing line. Further detail on the proposed development is included in the Statement of Case.

1.2 Kronospan had previously made an application for this building in 2016 but with larger dimensions (P/2016/0534). This application was refused by the Council and the current application was brought forward to address the perceived deficiencies of the original design. The building remained in the same location but the height was reduced by 3.9m and the length by 27m.

1.3 This second application was also refused by the Council on 6 November 2017, in a decision notice that contains one reason for refusal:

"*The proposed development, by virtue of its scale, height, massing and siting would have a detrimental impact up on the wider visual amenity of the area. This would have an adverse impact upon the character and setting of the World Heritage Site and nearby AONB. It would also have a detrimental impact upon Chirk Castle, particularly the setting of the Registered Park and Garden. To allow the development would be contrary to National Planning Policy TAN24 and 12 and Policy GDP1 of the adopted Unitary Development Plan.*"

1.4 This reason was the same as that given for the refusal of the 2016 application with one minor difference, the earlier text referring to TAN6 rather than TAN24. I assume that this change reflects the publication of TAN24 (The Historic Environment) in May 2017 and its obvious relevance to the determination of August 2017 planning application.

1.5 Kronospan has now lodged an appeal against this decision. I have been asked by the appellant to review the reason for refusal, in so far as it relates to cultural heritage matters, and to provide an independent statement regarding the impact of the proposed development on the cultural heritage resource.

1.6 My involvement with this development proposal began in April 2017 when I was invited to prepare a heritage assessment to accompany the planning application for the raw board store; this appears at Appendix C of the Planning Statement. I had previously advised Kronospan in relation to another planning appeal for the Chirk manufacturing site in 2016 (New Melamine Facing Press, Appeal Ref: APP/H6955/A/16/3165368) and contributed heritage assessments for two other planning applications for the site in 2017:

- Chipper and Flaker Facility (P/2017/0699); and
- OSB Manufacturing Facility (not yet submitted).

1.7 My understanding of the issues relevant to this present appeal is therefore based on my existing assessment of the proposed development as well as a more general appreciation of the Chirk manufacturing facility and its place in the setting of adjacent historic assets, acquired during site visits over the past year.

1.8 I also have other knowledge and experience that is relevant to the matters raised by this appeal. My professional practice over the past 10 years has been focussed on the impact of large-scale development in rural landscapes on the setting of historic assets. This has included examples of wind farms, energy-from-waste facilities and major residential developments. I have appeared as an expert witness in over 50 public inquiries and hearings for these types of development, including appeals related (as in the present case) to impacts on World Heritage Sites.

1.9 The evidence which I have prepared and provide for this appeal in this statement is true and has been prepared and is given in accordance with the guidance of my professional institution (the Chartered Institute for Archaeologists) and I confirm that the opinions expressed are my true and professional opinions.

2. The scope of my evidence

2.1 The scope of my evidence is defined by the Council's reason for refusal and the extent to which this reveals differences of opinion between the Appellant and the Council regarding impacts on the significance of historic assets.

2.2 Evidence can be limited to the assets that are named in the reason for refusal: Pontcysyllte Aqueduct and Canal (World Heritage Site and Scheduled Monument), and Chirk Castle. It is not clear from the text of the reason for refusal whether the reference to Chirk Castle refers to both the Grade I Listed Building of that name and the Registered Historic Park & Garden or only the latter asset.

2.3 In Section 3 of my statement I summarise the positions taken by the various parties on cultural heritage matters (the Appellant, the Council and three of the consultees). This leads on to Section 4 where I analyse and seek to explain the differences that exist between these positions. Finally, in Section 5, I draw conclusions regarding the acceptability of the proposed development in terms of its impact on the cultural heritage.

3. Positions taken by the different parties on cultural heritage matters

The Position of the Council

3.1 The Council's reason for refusal asserts that the proposed development "*would have an adverse impact upon the character and setting of the World Heritage Site*" … "*It would also have a detrimental impact upon Chirk Castle, particularly the setting of the Registered Park and Garden*".

3.2 The World Heritage Site (WHS) in question is the Pontcysyllte Aqueduct and Canal, a section of which runs close to the western boundary of the Kronospan site at Chirk. The canal has also been designated as a Scheduled Monument. Chirk Castle (a Grade I Listed Building) is in an elevated position to the west of Chirk within extensive landscaped grounds which have been designated as a Grade I asset in Part 1 of the Register of Landscapes, Parks and Gardens.

3.3 The wording of the reason for refusal introduces a degree of ambiguity regarding which historic asset or assets at Chirk Castle are considered to be affected. The reference to 'Chirk Castle' could be taken to mean the Grade I listed Building at the heart of the estate, separate from the reference to the 'Registered Park and Garden' which follows. Alternatively, the reference to 'Chirk Castle' could be taken to mean the estate as a whole, followed by the qualification that it is the heritage significance of the 'Registered Park and Garden' that would actually be affected.

3.4 The Council's decision reflects the advice it was given in the 'Report of the Head of Environment and Planning 6 December 2017' (CD01). The report deals with cultural heritage matters under the heading 'Visual Impact' on pages 44 and 45 and offers the following analysis and justification for refusal of the application:

"*The proposed development would not only rise considerably above tree level but would result in larger industrial buildings spread outwards and away from the existing concentration of tall structures. This in my opinion would significantly increase the visual influence of the industrial operation within the wider landscape setting and from key views from the adjoining AONB and WHS Buffer Zone as well as the setting of Chirk Castle Estate.*"

3.5 The final sentence of this quotation assists in the interpretation of the reason for refusal as it suggests that concern related to the setting of the Registered Historic Park at Chirk Castle and not the castle itself.

3.6 The report goes on to note that the Council's Conservation Officer concurs with this analysis, although no supporting report or other written advice from the Conservation Officer is cited. The report also notes that "*whilst CADW have not formally objected the WHS, Planning Landscape and Conservation Delivery Group have reiterated their objections to the proposal*".

3.7 I deal with the positions taken by these consultees in the next part of my statement but it is important to note here that the Council was offered conflicting advice. The WHS, Planning Landscape and Conservation Delivery Group objected to the application and Cadw did not. The Council, which is represented on the WHS Delivery Group, accepted the advice of that group.

3.8 There is no explicit statement in the report that links the planning officer's analysis to conclusions regarding compliance with relevant policy. The report references TAN6

(Planning for Sustainable Rural Communities), TAN12 (Design) and Policy GDP1 (Development Objectives) of the adopted Wrexham UDP but none of these provide policy relating to the setting of designated historic assets.

3.9 The reason for refusal, as set out in the decision notice, references a different group of documents: National Planning Policy, TAN24 (The Historic Environment), TAN12 and Policy GDP1. The advice provided in TAN24 is clearly relevant to any consideration of impacts on designated historic assets but does not in itself provide policy; this is found in the current edition of Planning Policy Wales (Edition 9, November 2016). The Council does not specify which policies in PPW it considers are engaged in this case and where it considers that non-compliance occurs.

The position of the WHS Planning, Landscape and Conservation Delivery Group

3.10 The WHS Planning, Landscape and Conservation Delivery Group ('the WHS Delivery Group') is a forum that brings together representatives of the three local authorities with responsibility for the WHS: Denbighshire County Council, Wrexham County Borough Council and Shropshire Council. Four other bodies with an interest in the WHS are also represented in the group: Cadw, Natural Resources Wales ('NRW'), the Canal and River Trust and the Clwydian Range and Dee Valley AONB Joint Committee ('the AONB Joint Committee').

3.11 In the context of this planning application, separate consultation responses were received from these four other bodies in addition to a joint response from the Delivery Group. The responses from Cadw and the AONB Joint Committee are dealt with individually below as they do refer to cultural heritage matters.

3.12 The NRW response is not directly relevant to this topic; however, it is worth noting the advice from NRW regarding the predicted visibility of the proposed development from the AONB. This includes views from Chirk Castle Estate, which lies within the AONB. The relevant advice is found in the section of its response titled 'Landscape' (letter dated 19/9/17, page 4) and NRW concludes "*there would be no significant effects on AONB views*".

3.13 The response from the Canal and River Trust simply confirmed that the application lay outside its remit as a statutory consultee. Similarly, the application is not within the remit of either Denbighshire County Council or Shropshire Council.

3.14 The consultation response from the WHS Delivery Group was provided in a short note attached to an e-mail dated 28 September 2017. The WHS Delivery Group notes that the application was 'largely a re-submission' of the previous application. It recognises that the proposed building extension has been slightly reduced in size but does "*not feel these amendments sufficiently address previous concerns and therefore the above comments still apply and the group objects to these proposals*".

3.15 The main analysis and justification for its objection is simply a quotation from its submission on the previous application which I reproduce here in full for ease of reference:

"…*in this instance the proposal would see an existing warehouse building increased to a height of almost 27metres along a length of 150metres. This increases the mass of the building substantially having greater dominance than other taller structures, comprising mostly stacks and flues, of much smaller overall volume. The warehouse buildings at present are relatively low lying within the landscape set at the approximate height of the adjoining woodland belt which provides a degree of screening at certain times of the year. The proposed development would not only rise considerably above the tree level but would see industrial operations spread outwards and away from the existing concentration of tall structures thereby detrimentally increasing the visual influence of the industrial operation within the wider landscape and from key views from the AONB and WHS Buffer Zone as well as the setting of the Chirk Castle Estate.*

This would be an unwelcome addition to the site with a sizeable, wider impact than previous developments. The applicant should consider more sensitive storage arrangements within the facility."

3.16 Comparison of this text with that at pages 44 to 45 of the Report of the Head of Environment and Planning, quoted above, demonstrates that the advice of the WHS Delivery Group is the main source that the Council relies on to justify its reason for refusal. This includes the reference to 'the setting of the Chirk Castle Estate', reinforcing the conclusion that the reason for refusal should be understood to refer to the Registered Historic Park and Garden and not the castle itself.

The position of the Clwydian Range and Dee Valley AONB Joint Committee

3.17 The response from the AONB Joint Committee takes a similar approach to that of the WHS Delivery Group, highlighting the fact that this is a re-submission of an earlier application and then maintaining the same reasons for objecting to the new application. Again, for ease of reference, the views of the AONB Joint Committee may be quoted in full here:

"*The Joint Committee notes that this is a resubmission of application Code No P/2016/0534 which was refused last year because of adverse effects on the setting of the AONB, WHS and Chirk Castle and its Historic Park and Garden. Although the scale of the proposal has been marginally reduced, the committee still has serious concerns that the scheme will have a harmful impact on the AONB and key heritage assets. Whilst it is recognised that the building is set within the established built up part of the site, the combined increase in height and breadth will introduce a large slab like structure into an area currently characterised by lower level buildings. This will inevitably have greater impacts on the AONB and important heritage assets which the committee considers are underplayed by the LVIA and Heritage Impact Assessment. The application documents do not appear to adequately explore all the available options to increase the capacity of the raw board store in less environmentally harmful ways, and the committee would suggest that the applicants be invited to identify and consider such options before the application is determined.*"

3.18 This response refers to impacts both on 'key heritage assets' and 'important heritage assets' but does not actually name specific assets. I assume that these are references to the WHS and Chirk Castle Park and Garden, which are referenced in the opening line quoted above.

The position of Cadw

3.19 Cadw engaged with this application on two occasions, providing written advice at the pre-application stage as well as responding to the application itself.

3.20 The pre-application response (letter dated 1 August 2017, contained in the Pre-Application Consultation Report submitted with the planning application) concluded that the draft heritage assessment provided by the applicant was 'inadequately documented' because it failed to take account of advice in recently published

guidance documents (TAN24 and two Cadw guidance notes: 'the Setting of Historic Assets' and 'Managing Change in World Heritage Sites'). Cadw made various recommendations, primarily regarding methods for the assessment of the WHS, and these were adopted in the finalised version of the applicant's heritage assessment.

3.21 Cadw's advice to the Council regarding the planning application is provided in a letter dated 20 September 2017. This makes clear at the outset that any advice is limited to historic assets covered by Cadw's statutory role. However, in this case, that includes the Pontcysyllte Aqueduct and Canal (for its designation both as a World Heritage Site and Scheduled Monument) and the historic park at Chirk Castle. Cadw's advice therefore encompasses both of the historic assets of concern to the WHS Delivery Group and there is no reason to believe that the different advice offered by these two consultees stems from differences in their respective remits.

3.22 Cadw provides its assessment of the affected historic assets on the second page of its letter, dealing with the Pontcysyllte Aqueduct and Canal in two separate assessments, as a Scheduled Monument and then as a WHS (as it recommended in its pre-application advice).

3.23 In its assessment of the canal as a Scheduled Monument, Cadw accepts that the proposed development would not be visible from most of the canal. It would be seen from a short section of canal near Chirk Marina (Viewpoint J) but it would "*be seen behind the existing Kronospan plant and therefore it will not constitute a significant alteration to this view*".

3.24 Regarding this asset as a WHS, Cadw advises that:

"*the impact of the proposed development in views from the World Heritage Site Pontcysyllte Aqueduct and Canal will be negligible. Likewise the proposed development will be seen along with the existing plant in the views from the Buffer Zone, but will constitute an addition to the complex*"

3.25 It then agrees that the proposed development would have no impact on the Outstanding Universal Value (OUV) of the WHS.

3.26 In the case of Chirk Castle RPG, Cadw advises:

"*The proposed development will not be visible in any of the identified significant views*" … "*but will be seen in views from the northern part of the historic park: However in these views only a small part of the proposed development will be seen*

and this will have no impact on the setting of the registered Chirk Castle Historic Park and Garden"

3.27 Cadw's overall advice is that it concurs with the conclusions of the applicant's heritage assessment and has no objection to the impact of the proposed development. It may be noted that this is an unqualified conclusion and provides no justification for the suggestion by the Council that Cadw has "not formally objected" (already quoted above from page 45 of the Council's report). This incorrectly implies some degree of objection from Cadw.

The position of the appellant

3.28 The appellant's understanding of the impact of the proposed development on the cultural heritage is set out in the heritage assessment report that I prepared on its behalf to accompany the planning application (Planning Statement, Appendix C). My report contains a detailed assessment and should be read in conjunction with this appeal statement; I do not propose to do more than summarise its findings here.

3.29 Having now read the submissions by other parties on the application I can confirm that I do not wish to change any part of my assessment.

3.30 The appeal site is located within the footprint of the existing Kronospan manufacturing facility at Chirk. There are no known historic assets within this area and, as the appeal site is located on previously disturbed ground, the potential for impacts is therefore limited to the effect of the operation of the proposed development on the settings of historic assets in the surrounding area.

3.31 The heritage assessment submitted with the application therefore adopts the four-stage approach to assessment recommended in the Welsh Government guidance on setting - Setting of Historic Assets in Wales, Cadw, 2017 (CD05).

3.32 In Stage 1, I considered all 92 of the designated historic assets located within 2km of the Kronospan site to identify which assets might be affected by the proposed development. From this initial review I identified three assets that merited detailed assessment because of some potential for adverse impacts on heritage significance. These were:

- Pontcysyllte Aqueduct and Canal World Heritage Site and Scheduled Monument
- Chirk Castle Historic Park & Garden (but not the Grade I Listed Building)

- Chirk Conservation Area

3.33 In Stage 2, I analysed the settings of these three assets and identified the contribution that setting makes to their significance.

3.34 In Stage 3, I investigated the ways in which the proposed development would change their settings and how this would affect heritage significance. This analysis was informed by ZTV mapping, photomontages and site visits. I concluded that the Raw Board Store would have no impact on their heritage significance or on OUV in the case of the World Heritage Site.

3.35 The Stage 3 assessment also considered the potential for cumulative impacts resulting from the combined operation of the four developments proposed by Kronospan at that time. I concluded that there would be cumulative impacts of negligible magnitude on the heritage significance of all three assets and on OUV in the case of the World Heritage Site.

3.36 Finally, in Stage 4 I concluded (given the results of Stage 3) that no mitigation measures would be necessary. It follows, given the conclusions of this assessment, that the appellant considers that the proposed development is acceptable in terms of its predicted impact on the cultural heritage.

3.37 As noted at the start of this section, my assessment was based on the approach recommended in the current national guidance on setting. This approach was advocated by Cadw in its pre-application consultation response. I am aware that there is local guidance for planning applications affecting the WHS which is also applicable in the present case. This is found in the Council's *Local Planning Guidance Note 33 Pontcysyllte Aqueduct and Canal World Heritage Site* (CD21).

3.38 Section 6.1 of the guidance (page 4) contains a check-list of matters that should be considered in an assessment of a development affecting the WHS. As explained in Appendix 2 of the guidance note, these are all components of the OUV of the WHS:

- *"An understanding of the character of the area in which the development is located and how development effects the setting of the World Heritage Site and Buffer Zone;*
- *How the development impacts on views in and out of the World Heritage Site;*
- *How the development contributes or minimises the impacts on the integrity and authenticity of the World Heritage Site;*

- *How the development contributes to the visitor's "sense of arrival" to the World Heritage Site*."

3.39 I can confirm that, although this local guidance uses different vocabulary to describe OUV, it does not alter my overall finding of no impact on OUV. My assessment establishes the existing industrial character of the area in which the proposed development would be located, within the Buffer Zone of the WHS, and fully explores the effect of the proposed development on the setting of the WHS.

3.40 My assessment considers effects on views in and out of the WHS, supported by photomontage evidence, and establishes that no significant views would be affected (as defined in Appendix 2 of the guidance note).

3.41 Given that the proposed development would be located within an existing manufacturing complex there is no reason to predict any impact on the integrity or authenticity of the WHS.

3.42 Finally, there would be no material impact on a visitor's 'sense of arrival' to the WHS. There are various routes that a visitor may take when approaching the WHS in the vicinity of Chirk. The A5 road is perhaps the most popular but the B5070 through Chirk (the old Holyhead Road) is also well-used. Others may arrive by train or by boat along the canal. In all cases, a visitor may be more or less aware of the existing Kronospan manufacturing facility in Chirk depending on the route taken. Whilst this facility is a feature that may detract from a visitor's sense of arrival at the WHS, as it does not support the OUV, addition of the raw board store would not materially change the visitor's experience of the facility as they pass by on their way to the WHS.

4. Differences between the parties

4.1 The five positions that I have summarised in Section 3 of this statement can be readily divided into two groups. On the one hand we have my own assessment on behalf of the Appellant and the consultation response from Cadw, which endorses my findings and offers no objection to the application. On the other hand, we have the WHS Delivery Group and the AONB Joint Committee who object to the

application on grounds relating to visual change in the setting of the WHS and Chirk Castle, and the Council which has chosen to accept this advice over that provided by Cadw and therefore has refused the application.

4.2 It is my opinion that the differences in position between these two groups are largely explained by differences in the methodology that they have applied to the assessment of impacts.

4.3 I have already summarised my understanding of relevant policy and guidance in Sections 2 and 3 of my heritage assessment (Planning Statement, Appendix C) and these can be referred to for more information. The method that I have adopted follows the approach to assessment recommended by Cadw in its guidance document *Setting of Historic Assets in Wales* (CD05), which also contains advice on both principles and definitions relating to setting.

4.4 The setting of a historic asset is defined in the guidance as:

"*the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive, negative or neutral contribution to the significance of an asset*." (page 2)

4.5 The guidance explains that a setting is not itself an historic asset and its importance lies in what it contributes to the significance of a historic asset (CD05, page 2). It is clear from this advice that when we refer to 'impacts' in the context of setting, we are not referring to 'impact on the setting of an historic asset'. We are assessing 'impact on the significance of the historic asset due to change in its setting'. It follows from this conclusion that we cannot assess this impact on an asset unless we have first understood how the setting of an asset contributes to its significance.

4.6 This critical point is embedded in the four-stage approach to assessment that is recommended by Cadw in its guidance:

- *Stage 1: Identify the historic assets that might be affected by a proposed change or development.*
- *Stage 2: Define and analyse the settings to understand how they contribute to the significance of the historic assets and, in particular, the ways in which these historic assets are understood, appreciated and experienced.*

- *Stage 3: Evaluate the potential impact of a proposed change or development on that significance.*
- *Stage 4: If necessary, consider options to mitigate the potential impact of a proposed change or development on that significance.* (CD05, page 5/6)

4.7 So, having determined the scope of an assessment in Stage 1, it is not possible to evaluate the impact of the proposed development (Stage 3) until you have understood how setting contributes to significance (Stage 2).

4.8 In my own assessment (Planning Statement, Appendix C) I explicitly undertake the Stage 2 analysis for the World Heritage site at paragraphs 4.57 to 4.61 and for Chirk Castle Historic Park and Garden at paragraphs 4.77 to 4.83. In both cases this affects the assessment of impacts in Stage 3.

4.9 In the case of the World Heritage Site, this analysis finds that in the section of the World Heritage Site potentially affected by the proposed development, there are no informative views of the canal from the buffer zone (paragraph 4.61) and the experience of the landscape when viewed from the canal is relatively uninformative when compared with the area around Chirk Aqueduct (paragraphs 4.59 and 4.60). These findings inform the Stage 3 impact assessment (paragraphs 4.62 to 4.70) where a detailed analysis of visual change (supported by ZTV mapping and photomontages) is tempered by the understanding that this change is occurring in views that contribute little to the OUV of the World Heritage Site.

4.10 In the case of the Historic Park and Garden at Chirk Castle, a key finding of the Stage 2 analysis is that the most substantive contribution that setting makes to the heritage significance of the asset comes from two designed views that have been incorporated into the historic layout of the park (paragraphs 4.82 and 4.83). In the Stage 3 impact assessment (paragraphs 4.84 to 4.86) it is found that, despite some predicted intervisibility from within the park, neither of these designed views would be changed by the proposed development.

4.11 I believe that it is the failure of the WHS Delivery Group and the AONB Joint Committee to undertake a Stage 2 analysis of the contribution that setting makes to heritage significance that undermines their assessment of impact. In both cases, the consultation responses focus solely on the nature and extent of visual change in the setting of the historic assets predicted by the various photomontages, without

justification of how this change would affect heritage significance or OUV in the case of the World Heritage Site.

4.12 The WHS Delivery Group representation refers to "*increasing the visual influence of the industrial operation*" … "*from key views from the AONB and WHS Buffer Zone as well as the setting of the Chirk Castle Estate*" but does not define where those key views are or how they contribute to heritage significance. The AONB Joint Committee representation assumes that the appearance of the proposed building will "*inevitably have greater impacts on the AONB and important heritage assets*" but does not explain why heritage significance would be affected by visual change in certain views.

4.13 I accept that the proposed building is a large structure, and therefore there is potential for it to change the setting of adjacent historic assets in ways that could affect their heritage significance. However, careful analysis of the contribution that setting makes to significance of these assets and a detailed investigation of the predicted appearance of the proposed raw board store has demonstrated that this potential for harm would not be realised.

4.14 The proposed development would be visible from some locations (as noted by the objectors) but visual change is not itself an impact on heritage significance or, in the case of the WHS, its OUV.

4.15 It is perhaps inevitable that assessment tends to focus on areas where change in setting would occur and to then illustrate that change in photomontage views. However, these viewpoints are not intended to be representative of the way in which settings would be changed; it is unfortunate that the resulting photomontages can come to dominate our understanding.

4.16 For example, in the present assessment it should be remembered that Viewpoint J is not representative of how the proposed development would be seen from the WHS. Rather it is the only location within the WHS where the proposed development would be visible. As a result, the experience of walking along the towpath or steering a boat along the canal would not be materially changed.

4.17 The same point may be made regarding the WHS Buffer Zone. The proposed development would be clearly visible from Viewpoint E but this location is, in no sense, representative of how the raw board store would be experienced from within

the Buffer Zone. It is immediately apparent from a visit to Green Lane that the illustrated viewpoint is a rare glimpse to the west from an enclosed lane, lined by hedges. Also, in the context of the WHS, it cannot be classified as a key view because it does not allow a visitor to experience any component of the OUV.

4.18 To summarise, I believe that the objections to the planning application from the WHS Delivery Group and the AONB Joint Committee (and the resulting refusal of planning permission by the Council) arise from an incorrect approach to the assessment of how change in the setting of heritage assets impacts on their significance. These organisations have assumed that the predicted changes in the appearance of the Kronospan manufacturing site from viewpoints within the setting of the World Heritage Site and Chirk Castle Historic Park and Garden must have an adverse impact on the heritage significance of these assets.

4.19 A correct approach to assessment (as recommended by Cadw), based on an understanding of how the setting contributes to the significance of these assets, leads to different conclusions because it is appreciated that the predicted visual change would not affect the positive contribution that setting makes to significance for these assets.

5. Conclusions

5.1 In this statement I have summarised the positions of the five parties that have expressed views on the cultural heritage matters relevant to this appeal.

5.2 There is general agreement that only two historic assets might be affected by the proposed development: Pontcysyllte Aqueduct and Canal (a World Heritage Site and Scheduled Monument) and Chirk Castle (a Registered Historic Park & Garden).

5.3 My own assessment on behalf of the Appellant concludes that the proposed raw board store would have no impact on the heritage significance or OUV of the Pontcysyllte Aqueduct and Canal and no impact on the heritage significance of Chirk Castle Historic Park and Garden. The findings of this assessment, which employs a methodology consistent with relevant guidance, have been endorsed by Cadw.

5.4 In contrast, the WHS Delivery Group and the AONB Joint Committee have advised that there would be adverse impacts on both historic assets. The Council has accepted this advice and it has used it as justification for refusal of the planning application.

5.5 I consider that the approach to assessment adopted by the WHS Delivery Group and the AONB Joint Committee was flawed because it failed to take account of the contribution that setting makes to the heritage significance of an historic asset. This methodological flaw led both parties to reach incorrect conclusions which, in turn, persuaded the Council to refuse the planning application on cultural heritage grounds.

5.6 I believe that this decision, based on flawed advice, is not correct and the reason for refusal cannot be substantiated on cultural heritage grounds. I invite the Inspector to accept the alternative conclusions reached by Cadw and in my own assessment and conclude that the proposed development is acceptable in cultural heritage terms.