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Andrew Russell
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Eich cyfeirnod Your reference	AR/2196-01
Ein cyfeirnod Our reference	
Dyddiad Date	1 August 2017
Llinell uniongyrchol Direct line	03000 256007
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Dear Mr Russell,

AR/2196-01 Development of a raw board store, Kronospan Ltd, Chirk, Wrexham

Thank you for your letter of 3 July 2017 inviting our comments on the pre- planning application consultation for the proposed development as described above. The following comments are based on information made available to us as part of the pre-application consultation and we will review our comments when we are consulted on the final planning application.

Advice

Having carefully considered the information provided, we consider that it is inadequately documented. Our assessment of the application is given below.

Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

National Policy

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Technical Advice Notes and circular guidance.

PPW (Chapter 6 – The Historic Environment) explains that the conservation of

archaeological remains is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains, whether scheduled or not, and their settings are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in an adverse impact on a scheduled monument (or an archaeological site shown to be of national importance) or has a significantly damaging effect upon its setting. Technical Advice Note 24 : The Historic Environment elaborates by explaining that there is a presumption against proposals which would involve significant alteration or cause damage, or which would have a significant impact on the setting of remains.

PPW also explains that local authorities should protect parks and gardens and their settings included in the first part of the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales, and that the effect of a proposed development on a registered park or garden or its setting should be a material consideration in the determination of a planning application.

Assessment

There are a number of issues with Cultural Heritage Appraisal produced by Headland Archaeology that will need to be rectified before we can make a formal response in regard to the impact of the proposed development on the historic environment. These are:-

The heritage appraisal is dated 13th June 2017 however on the 31st May 2017 Welsh Government published TAN 24 the Historic Environment. This document presents a number of changes from the draft document quoted in the heritage appraisal including a different definition for the setting of a historic monument. The heritage appraisal will therefore need to be revised in the light of these changes.

At the same time as publishing TAN 24 the Welsh Government issued a number of guidance documents, including "Setting of Historic Assets", and **"**Managing Change in World Heritage Sites in Wales". The submitted heritage appraisal has been carried out using a similar methodology to Setting of Historic Assets and therefore the conclusions it reaches in regard to the impact of the proposed development on the setting of the Registered Chirk Castle Historic Park and Garden and the Chirk Conservation Area are valid. However, the assessment of the impact of the development on the World Heritage Site relates to the impact on its setting and not on the Outstanding Universal Values of the World Heritage Site and therefore this assessment will need to be redone taking into account the guidance given in **"**Managing Change in World Heritage Sites in Wales". .

Finally the Pontcysyllte Aqueduct and Canal is a scheduled monument as well as being a World Heritage Site and therefore an assessment of the impact of the proposed development on the setting of the scheduled monument will also need to be included in the heritage appraisal.

Yours sincerely

Nichola Davies
Diogelu a Pholisi/ Protection and Policy