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Planning
Wrexham County Council

Sent by email

Eich cyfeirnod Your reference	P/2025/1578
Ein cyfeirnod Our reference	
Dyddiad Date	14 January 2025
Llinell uniongyrchol Direct line	03000 256007
Ebost Email:	Cadwplanning@gov.wales

Dear Sir / Madam,

Planning Application – Ref: P/2024/1578

Thank you for your letter inviting our comments on the information submitted for the above planning application.

Advice

We consider that the application is inadequately documented, and we recommend that additional information is required to enable a balanced decision to be taken against Planning Policy Wales, Technical Advice Note 24 Historic Environment and associated guidance. Full details of the additional information that is required are explained in the below assessment. The national policy and Cadw's role in planning are set out an Annex A.

Assessment

Scheduled Monuments

DE109 Offa's Dyke: Brymbo Hill Section
DE110 Offa's Dyke: Section S from Cae Llewellyn
DE112 Offa's Dyke: Section S from Pen y Coed
DE113 Offa's Dyke: Vron Farm Section
DE180 Offa's Dyke: Section in Plas Power Park
DE181 Offa's Dyke: South Section at Coedpoeth
DE182 Offa's Dyke: North Section at Coedpoeth
DE183 Offa's Dyke Section South of River Gwenfro
DE184 Offa's Dyke: Vron Section
DE185 Offa's Dyke: Section South of Brymbo Colliery
DE202 Brymbo Ironworks: Early Blast Furnace, Cast House & Foundry
DE203 Penrhos Engine House
DE222 Offa's Dyke: Mountain View Section
DE233 Brymbo Lead Smelting Works
DE237 Nant Mill Wood Shaft Mounds
DE241 New Minera Lead Mine
DE242 Minera Halvans Plant
DE243 Taylor's Shaft, Minera

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DE244 Meadow Shaft, Minera
FL132 Bridge 157m E of Ffrith Village
FL164 Ffrith Roman Site
FL203 Plas Maen Cottage round barrow

Registered Parks and Gardens

PGW(C)6(FLT) Bryn Iorcyn

The above designated historic assets are located inside 3km of the proposed development. The application area of the grid connection for the proposed development (either overhead or underground cable) passes some 0.5m from the scheduled monument DE202 Brymbo Ironworks: Early Blast Furnace, Cast House & Foundry. The applicants should be aware that it is their responsibility to inform all contractors about the nature and extent of the scheduled area, and the restrictions which scheduling imposes. If any ground works, service trenches, works compounds, temporary storage etc. are planned to take place within the scheduled area or on its boundary, then the applicant should contact Cadw to ascertain whether scheduled monument consent will be required.

The application is accompanied by a Heritage Impact Assessment produced by Heneb: Clwyd-Powys Archaeology that assess the impact of the proposed development on the above designated historic assets. This work considered an appropriate search area for designated historic assets to be a 500m buffer of from the centre of the development area (area of photovoltaic panels). Within this area are the scheduled monuments:

DE109 Offa's Dyke: Brymbo Hill Section
DE185 Offa's Dyke: Section South of Brymbo Colliery
DE202 Brymbo Ironworks: Early Blast Furnace, Cast House & Foundry
DE203 Penrhos Engine House

From the results of a combination of site visit and a calculated zone of theoretical visibility (ZTV) the report concludes that, assuming the screening effect of the heavy tree growth surrounding the site will be maintained none of these scheduled monuments would be directly affected by the construction of the area of solar panels, and there would be no adverse effect on their settings. However, the report provides no assessment of the potential setting effect of the proposed grid connection which (if overground) will be visible from scheduled monument DE202 Brymbo Ironworks: Early Blast Furnace, Cast House & Foundry. Therefore, this Heritage Impact assessment should be amended to include an assessment of the potential effect of this grid connection. Once this information has been submitted, Cadw should be reconsulted on this application.

Yours sincerely,

Nichola Smith
Historic Environment Branch

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Annex A

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 related guidance.

PPW Planning Policy Wales - Edition 12 explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains 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 a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)

Technical Advice Note 24: The Historic Environment elaborates by explaining that when considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains.

Historic Parks and Gardens

PPW also explains that local authorities should value, protect, conserve and enhance the special interests of parks and gardens and their settings included on the register of historic parks and gardens 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.