

Planning Services
Wrexham County Borough Council

By E-Mail

Eich cyfeirnod
Your reference

P/2023/0682

Ein cyfeirnod
Our reference

Dyddiad
Date

18 October 2023

Llinell uniongyrchol
Direct line

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Ebost
Email:

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Dear Sir/Madam

Planning Application – Erection of agricultural building (in retrospect) at Penrhos Farm, Penrhos, Brymbo, Wrexham, LL11 5LU.

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 in 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
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

The above scheduled monuments are located inside 1km of the proposed development, but intervening topography, buildings and vegetation block all views between them except for scheduled monument DE203 Penrhos Engine House.



Consequently, the proposed development will have no impact on the settings of these scheduled monuments other than DE203 Penrhos Engine House.

The proposed development is located some 80m northeast of scheduled monument DE203 Penrhos Engine House. It is located within the wider setting that relates to the former Brymbo Collieries and is inter-visible with the scheduled monument. It therefore may have an adverse effect upon the setting of the scheduled monument. This will be a material consideration in the determination of this application (see Planning Policy Wales 2021, section 6.1.23): However, no information on this issue has been submitted with the application and therefore we are currently not in a position to provide the LPA with advice. Consequently, the LPA should request more information on this issue to be provided. This will require an assessment of the impact of the proposed development on the setting of the scheduled monument to be prepared by a competent and qualified historic environment expert in accordance with the methodology outlined in the Welsh Government's best-practice guidance Setting of Historic Assets in Wales (2017). Once this information has been submitted to the LPA Cadw should be reconsulted on this application.

Yours sincerely

Nick Segust

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-11.pdf](#) 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.