



Llywodraeth Cymru
Welsh Government

Plas Carew, Uned 5/7 Cefn Coed
Parc Nantgarw, Caerdydd CF15 7QQ
Ffôn 01443 33 6000 Ffacs 01443 33 6001
Ebost cadw@cymru.gsi.gov.uk
Gwefan www.cadw.cymru.gov.uk

Plas Carew, Unit 5/7 Cefn Coed
Parc Nantgarw, Cardiff CF15 7QQ
Tel 01443 33 6000 Fax 01443 33 6001
Email cadw@wales.gsi.gov.uk
Web www.cadw.wales.gov.uk

Matthew Phillips
Wrexham County Borough Council

Matthew.phillips@wrexham.gov.uk

Eich cyfeirnod
Your reference

P/2016/0189

Ein cyfeirnod
Our reference

Dyddiad
Date

19 April 2016

Llinell uniongyrchol
Direct line

01443 336007

Ebost
Email:

Helen.may2@wales.gsi.gov.uk

Dear Sir / Madam,

Proposed 189 dwellings, Land east of Tan Y Bont – Rhosrobin

Thank you for your email of 9 March 2016 inviting our comments on the planning application for the proposed development as described above.

Background

Our role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that a proposal will have on scheduled monuments or registered historic parks and gardens. It is a matter for the local planning authority to then weigh our assessment against all the other material considerations in determining whether to approve planning permission, including issues concerned with listed buildings and conservation areas.

The application is for the proposed construction of 189 dwellings on what are presently pasture fields to the west of Wat's Dyke: Section W of Ty-Gwyn. We provided detailed comments on a previous version of this application for 400 dwellings on 13 February 2015 and on 7 September 2015 following the reduction in the number of proposed dwellings to 338. We expressed concerns that the development would have a significant adverse impact on Wat's Dyke: Section W of Ty-Gwyn and its setting.

Our views are expressed without prejudice to the Welsh Ministers' consideration of the planning application, should it come before them formally for determination.

Conclusion

The proposed development is located within the vicinity of the scheduled monuments known as Wat's Dyke: Section W of Ty-Gwyn (DE151) and Wat's Dyke: Garden Village Section (DE221). In our view the proposed development is likely to have a significant adverse impact on the setting of Wat's Dyke: Section W of Ty-Gwyn,

Mae'r Gwasanaeth Amgylchedd Hanesyddol Llywodraeth Cymru (Cadw) yn hyrwyddo gwaith cadwraeth ar gyfer amgylchedd hanesyddol Cymru a gwerthfawrogiad ohono.

The Welsh Government Historic Environment Service (Cadw) promotes the conservation and appreciation of Wales's historic environment.

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.
We welcome correspondence in both English and Welsh.



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE



which is presently one of the last unenclosed sections of Wat's Dyke in the area. We therefore object to the impact of the proposed development on Wat's Dyke: Section W of Ty-Gwyn as it is considered to be contrary to national policy concerned with the historic environment. Our reasoning is set out below.

Planning 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 explains that the desirability of preserving an ancient monument and its setting is a material consideration in determining a planning application whether that monument is scheduled or not. Furthermore, it explains that 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 preservation in situ. Paragraph 17 of Circular 60/96, Planning and the Historic Environment: Archaeology, elaborates by explaining that this means a presumption against proposals which would involve significant alteration or cause damage, or which would have a significant impact on the setting of visible remains.

Significance

The monument (DE151) consists of the remains of a length of Wat's Dyke, a substantial early medieval defensive bank and ditch of substantial dimensions presumed to have been constructed in the 8th century AD. It is of national importance as a well preserved relic from the period and for its potential to enhance our knowledge of early medieval defensive organisation and settlement. It retains significant archaeological potential, with a strong probability of the presence of associated archaeological features and deposits.

This early medieval boundary earthwork known today as Wat's Dyke ran for almost 60km from Maesbury (Shropshire) to Basingwerk (Flints.) and comprised a substantial bank and with a ditch on its western side. Over the centuries since its construction agricultural activity and encroachment, particularly where it passes through urban areas, have resulted in damage and loss of some sections. Nevertheless, the overall extent of the dyke survives and it remains an important landscape feature, often preserved and utilised as modern parish and property boundaries. Wat's Dyke is one of the longest linear monuments of its kind in Western Europe. Along with Offa's Dyke it represents a remarkable feat of historic engineering and provides important evidence of the nature of early medieval territorial boundaries. This national importance is emphasised by the designation of the surviving upstanding sections of the earthwork as scheduled monuments. Today, some sections of the monument are situated within narrow corridors in an urban context and others survive in a rural position, the preservation of bank and ditch varying with location. Each section is of importance for the archaeological value it holds and also contributes to the wider significance of the Dyke in its landscape context. In all cases the position of the dyke with respect to the topography of the land around is of particular importance and reflects the purpose behind its construction.

Assessment

The section directly affected by the proposed development (DE151) survives as an upstanding earthen bank with intermittent traces of the ditch to its west, now predominantly back-filled and levelled off. The section runs roughly north-south for almost 400m. The context or setting in which it is experienced is one of open fields and green space with a well-used footpath flanking its east side, one of the few such

stretches of the monument to survive in open land in the Wrexham area. The A483 severs the southern end of this section monument leaving an island of bank within woodland to the south of the road.

Whilst the outline development layout presents a marked improvement on previous versions of this scheme, retaining distant views west towards the hills at the northern end of the monument, the development of the open space to the west and south-west of this section of the Dyke will dramatically and adversely change views over what is presently open ground, notably towards the southern end of the scheduled area by the A483 where the monument is in greater proximity to the development site. The development will introduce alien modern housing into an environment which is primarily rural in appearance and adversely affect appreciation of this nationally important historic monument. It is notable that whilst a 'no development' buffer zone of 30m is proposed to the west of the Dyke, the plans sent suggest that the apex of the eastern area of medium density development encroaches upon the buffer at the southern end of Wat's Dyke: Section W of Ty-Gwyn (DE151) removing that protection. In addition, views south along the line of the Dyke and footpath towards the A483 will also be adversely affected as the monument becomes effectively confined between the road and the proposed housing. Whilst the retention of the existing trees will offer some degree of screening this is likely to be only partial and seasonal.

The application states that the monument is to be improved as a feature in the green area to the east of the development site, but no further information has been provided. It should be noted that any proposed improvement requiring physical intervention with the monument would require scheduled monument consent from the Welsh Ministers, (in practice, the Historic Environment Service Cadw). We would welcome further details of what improvements are proposed.

Yours sincerely

Helen May
Diogelu a Pholisi/ Protection and Policy