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Planning Services
Wrexham County Borough Council

By Email

Eich cyfeirnod Your reference	P/2025/0430
Ein cyfeirnod Our reference	
Dyddiad Date	7 October 2025
Llinell uniongyrchol Direct line	0300 0257894
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Dear Sir/Madam

Planning application for an employment unit and new vehicular access, car and HGV parking, servicing and storage area, landscaping and ancillary development on land at Oak Road, Wrexham Industrial Estate, Wrexham

Thank you for your letter inviting our comments on the planning application consultation for the proposed development described above.

This response is based on the advice provided by Cadw's Senior Historic Environment Planning Officer.

Advice

We have significant concerns about the impact on the scheduled monument[s] [and/or registered historic parks and gardens]. However, we consider that if mitigating measures were undertaken, our concerns about the impact would be reduced.

The national policy and Cadw's role in the planning process is set out in Annex A.

Assessment

Monument of National Importance

Royal Ordnance Factory (ROF) Marchwiel

The application area is the site of part of the former Second World War Royal Ordnance Factory, with the well-preserved remains of one of the factory's nitroglycerin hills being located to the west of the application area (nitroglycerin was a key ingredient in the manufacture of the explosive cordite). All of the surviving buildings and structures associated with the production of nitroglycerin have been determined to be of National importance: However, whilst the application area was originally populated by similar buildings and structures to that which survive on the nitroglycerin hill, the majority of the structures in the application area have been demolished and removed. The Heritage

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Statement submitted with the application indicates that two pill boxes survive on the site and these will need to be demolished to facilitate the proposed development.

We have therefore considered the impact of the proposed development on the setting of the surviving buildings and structures of the former Second World War Royal Ordnance Factory and concluded that it will retain a broad industrial function and appearance similar to the historic use of the site and therefore will not significantly alter the way the preserved buildings and structures are experienced, understood and appreciated Consequently the proposed development will not have a significant impact on their setting.

As noted above the proposed development will require the demolition of two pill boxes associated with the Royal Ordnance Factory. It will be necessary for these to be fully recorded before they are demolished and given that they are associated with a nationally important historic assets, the record should meet the Level 4 standard given in the "Guide to Good Recording Practice for Historic Buildings in Wales"

Yours sincerely

Nick Segust
Case Officer
Historic Environment Inspectorate

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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 (gov.wales) 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.