AOC Archaeology Group

BEFESA IVC
FENN'S BANK, WREXHAM

HERITAGE IMPACT ASSESSMENT

28394

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Archaeology • Heritage • Conservation

On Behalf of: *Axis*
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Glossary and Abbreviations

Glossary

Term	Definition
Aesthetic Value	Value deriving from the ways in which people draw sensory and intellectual stimulation from a place.
Archaeological Site	A place or group of physical sites in which evidence of past human activity is preserved; the place where a historic asset is located.
Communal Value	Value deriving from the meaning of a place for the people who relate to it, or from whom it figures in their collective experience or memory.
Conservation Area	An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance, designated under the Planning (Listed Buildings and Conservation Areas) Act 1990.
Cultural Significance/Cultural Heritage Value	The aesthetic, historic, scientific, social, or spiritual value for past, present or future generations.
Designated Historic/Heritage Asset	A World Heritage Site, Scheduled Monument, Registered Historic Landscape, Registered Historic Park and Garden, Listed Building, Protected Wreck Site or Conservation Area designated as such under the relevant legislation.
Direct Physical Impacts	Potential physical impacts, on known or unknown buried archaeological remains which may survive, that relate to the possibility of disturbing, removing, or destroying in situ remains and artefacts during ground-breaking works (including excavation, construction, and other works associated with the Proposed Development). Direct physical impacts have the capacity to result in impacts of high magnitude as they could potentially result in the destruction or removal of any archaeological deposits which may be present.
Evidential Value	Value deriving from the potential of a place to yield evidence about past human activity.
Harm	A change for the worse, here primarily referring to the effect of inappropriate interventions on the heritage values of a historic asset.
Historic/Heritage Asset	An identifiable component of the historic environment. It may consist or be a combination of an archaeological site, a historic building or area, historic park and garden or a parcel of historic landscape. Nationally important historic assets will normally be designated.
Historic Environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and deliberately planted or managed.
Historic Value	Value deriving from the ways in which past people, events and aspects of life can be connected through a place to the present.
Indirect Physical Impacts	Impacts that arise from the proposal or change, even though the asset lies beyond the site boundary. This could include damage from vibration, piling, blasting, changes to ground water levels or changes to erosion.
Listed Building	A building of special architectural or historic interest which is included in a list compiled or approved by the Welsh Ministers.

Term	Definition
Non-Designated Heritage Asset	A heritage asset which is not designated, usually identified by local historic environment records protected by PPW 12.
Registered Historic Landscape	A historic landscape of national importance recorded on the Register of Landscapes of Historic Interest in Wales compiled and administered by Cadw.
Registered Historic Park and Garden	A park or garden of special historic interest is recognised by law through the Historic Environment (Wales) Act 2023 and recorded on a register compiled by Welsh Ministers and administered by Cadw.
Scheduled Monument	A monument which is included in the Schedule of monuments compiled and maintained by the Welsh Ministers under the Ancient Monuments and Archaeological Areas Act 1979.
Setting	The surroundings in which a historic asset is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Setting is not itself a historic asset, though land within a setting may contain other historic assets. Elements of a setting may make an adverse (diminishment) or positive (beneficial) contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral.
Setting Impacts	Potential impacts which include consideration of whether any change as a result of a development would constitute an adverse impact (diminishment) to those attributes of the designated assets which directly contribute to their significance rather than simply being an alteration to, or addition of a new element to the existing settings of these assets. Where a new development may be located within the setting of an asset but does not diminish the significance of the asset or the ability to appreciate that significance, it may have a neutral impact.
Significance	The sum of the cultural and natural heritage values of a place, often set out in a statement of significance.
World Heritage Site	A natural or cultural site, area or structure recognised as being of Outstanding Universal Value and inscribed under the UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage 1972.
Written Scheme of Investigation	A written statement on the objectives of a project, including methods, timetables, and resources. These form the framework for the execution of the project through to completion, set out in sufficient detail to be quantifiable, implemented, and monitored. Normally prepared by an archaeologist or organisation undertaking the fieldwork, frequently in response to a brief/project outline or specification. The project design may be updated following a post-excavation assessment.

Abbreviations

Abbreviations	Definition
ADS	Archaeological Data Service
ALGAO	Association of Local Government Archaeological Officers
AOD	Above Ordnance Datum
BGS	British Geological Survey
CIfA	Chartered Institute for Archaeologists
CUCAP	Cambridge University Collection of Aerial Photography

Abbreviations	Definition
DBA	Desk-Based Assessment
DTM	Digital Terrain Model
EIA	Environmental Impact Assessment
HIA	Heritage Impact Assessment
HER	Historic Environment Record
HLCA	Historic Landscape Character Area
ICOMOS	International Council on Monuments and Sites
IEMA	Institute of Environmental Management and Assessment
ISO	International Organization for Standardization
IVC	In-Vessel Composting
LiDAR	Light Detection and Ranging
NCAP	National Collection of Aerial Photography
NGR	National Grid Reference
NLS	National Library of Scotland
NLW	National Library of Wales
NPPF	National Planning Policy Framework
PAS	Portable Antiquities Scheme
PPW	Planning Policy Wales
OS	Ordnance Survey
RHL	Registered Historic Landscape
RHPG	Registered Historic Park and Garden
RO	Registered Organisation
RCAHMW	Royal Commission on the Ancient and Historical Monuments of Wales
TAN	Technical Advice Note
UNESCO	United Nations Educational, Scientific and Cultural Organization
WHS	World Heritage Site
WSI	Written Scheme of Investigation
ZTV	Zone of Theoretical Visibility

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Executive Summary

AOC Archaeology Group was commissioned by Axis to undertake a Heritage Impact Assessment of the former Befesa Salt Slag facility (hereafter – the 'Site'). The site lies within the local authority administrative area of Wrexham County Borough Council.

This assessment has identified that the Site was largely agricultural in nature until the development of the Befesa Salt Slags at the end of the 20th century. Whilst there may be a High potential for post-medieval agricultural or industrial archaeological remains to be present within the Site, these would be considered to be of Low importance and are likely to have been destroyed by the 20th century development. There is a Low potential for previously undiscovered prehistoric, Roman, medieval, or modern archaeological remains to be present within the Site.

In accordance with national and local planning policies on heritage, it is recommended that a watching brief is carried out during any groundworks required as part of the Proposed Development. If significant features are encountered, further archaeological works, including full excavation and a programme of post-excavation, works may be required. The scope and details of any further works would be agreed in consultation with Heneb.

CIfA (2021) and The Association of Local Government Archaeological Officers (ALGAO) (Mann 2023) have recently noted the need for public benefit in archaeology. In this case if a programme of public engagement and/or enhancement were to be considered, engagement could include desk-based, digital and on-site interpretation and dissemination about any archaeological remains which may survive on the Site or to wider archaeological and historical information around the area. The scope and requirement of any public benefit should be agreed by the Client and be undertaken in consultation with the Client and Heneb.

There is one designated heritage asset within the 1km Study Area that has been considered for setting impacts: the 18th century Grade II Listed Fenn's Old Hall Barn (Asset 1). As the predicted impacts to the setting of the asset as a result of the Proposed Development would be a Neutral impact, no harm to this asset is predicted, and the policy tests as set out in PPW 12 are not invoked.

1 Introduction

1.1 Development Site

1.1.1 AOC Archaeology Group was commissioned by Axis to undertake a Heritage Impact Assessment (HIA) of the former Befesa Salt Slag facility (hereafter – the 'Site'). The Site lies within the local authority administrative area of Wrexham County Borough.

1.1.2 The Site comprises an area of c.4.8 hectares (ha) located c 3.5km south-west of Whitchurch, off Fenn's Bank, and is centred on National Grid Reference (NGR) SJ 50605 39103. It is surrounded on each side by agricultural fields with an industrial area to the south and a farm with associated buildings to the east. It is bound by the A495 in the north-west and Fenn's bank on the east.

1.2 Development Proposal

1.2.1 Axis commissioned AOC Archaeology Group to undertake a Heritage Impact Statement as part of a planning application for an In-Vessel Composting (IVC) Facility.

1.2.2 The proposal for the development is to re-purpose existing buildings and hardstanding from the Salt Slag facility for the In-Vessel Composting along with the construction of a scrubber, biofilters and external composting maturation pad and refining plant.

1.2.3 The IVC facility and all associated infrastructure will together be referred to as the 'Proposed Development'.

1.3 Topographical and Geological Conditions

1.3.1 The British Geological Survey Geoindex indicates that the bedrock geology underlying the Site consists of Branscombe Mudstone Formation, a sedimentary bedrock formed between 228.4 and 201.3 million years ago during the Triassic period. The superficial deposits are glaciofluvial deposits and Devensian sand and gravel. This sedimentary deposit formed between 116 and 11.8 thousand years ago during the Quaternary period (BGS 2025).

1.3.2 There are no recorded borehole survey results with the Site.

1.3.3 The topography of the Site is relatively flat sloping down to the northeast from 95m Above Ordnance Datum (AOD) in the southwest corner to 90m AOD in the northeast corner. There are a number of modern industrial buildings and a water reservoir within the Site.

1.4 Government and Local Planning Policies and Guidance

Legislative Framework

1.4.1 Parliamentary legislation for Listed Buildings in England and Wales is provided by the *Planning (Listed Buildings and Conservation Areas) Act 1990* and legislation for Scheduled Monuments and other buried archaeological remains is provided by the *Ancient Monuments and Archaeological Areas Act 1979*. This legislation includes amendments by the *Historic*

Environment (Wales) Act 2023. These Acts provide the framework within which designated heritage assets including Scheduled Monuments, Listed Buildings, Historic Landscapes and Registered Historic Parks and Gardens are designated, protected, and managed, as well as placing a Statutory duty on the Welsh Archaeological Trusts to maintain Historic Environment Records (HERs).

Planning Policy Wales

1.4.2 *Future Wales* is the national development framework for Wales and should be read alongside the *Planning Policy Wales*. It influences all levels of the planning system in Wales to shape Strategic and Local Development Plans prepared by councils and national park authorities. Criteria 6 of *Future Wales Policy 18* states that proposals will be permitted if "*there are no unacceptable adverse impacts on statutorily protected built heritage assets*" (Welsh Government 2021, 95).

1.4.3 Edition 12 of the *Planning Policy Wales* (PPW 12) was published by the Welsh Government in February 2024. PPW 12 sets out the Government's planning policies for Wales and how these should be applied. It provides a framework within which locally prepared plans for development can be produced and assessed. Chapter 6 of the PPW 12 is concerned with '*Conserving and Enhancing the Historic Environment and its Assets'*. It identifies heritage assets as "*central to Wales's culture and its character*" (Welsh Government 2024, 129: para 6.1.1) and that "*it is important that the planning system looks to protect, conserve and enhance the significance of heritage assets*" (*ibid*., 130: para 6.1.7). PPW 12 also notes that:

The planning system must take into account the Welsh Government's objectives to protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations. The historic environment is a finite, non-renewable and shared resource and a vital and integral part of the historical and cultural identity of Wales. It contributes to economic vitality and culture, civic pride, local distinctiveness and the quality of Welsh life. The historic environment can only be maintained as a resource for future generations if the individual historic assets are protected and conserved (*ibid*., 130: para 6.1.5).

1.4.4 Regarding designated heritage assets, PPW 12 states that there should be a general presumption in favour of the preservation or enhancement of designated assets including Listed Buildings (paras 6.1.10-6.1.13), Conservation Areas (paras 6.1.14-6.1.17), Registered Historic Parks and Gardens (paras 6.1.18-6.1.19), and Registered Historic Landscapes (paras 6.1.20-6.1.21).

1.4.5 Regarding archaeological remains, PPW 12 states that:

The conservation of archaeological remains and their settings is a material consideration in determining planning applications, whether those remains are a scheduled monument or not (*ibid*., 132: para 6.1.23).

Where nationally important archaeological remains and their settings are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ (*ibid*., 132: para 6.1.24).

Where archaeological remains are known to exist or there is a potential for them to survive, an application should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to allow a full understanding of the impact of the proposal on the significance of the remains. The needs of archaeology and development may be reconciled, and potential conflict very much reduced, through early discussion and assessment (*ibid*., 133: para 6.1.26).

On occasions, unforeseen archaeological remains may still be discovered during the course of a development. A written scheme of investigation should consider how to react to such circumstances or it can be covered through an appropriate condition for a watching brief. Where remains discovered are deemed to be of national importance, the Welsh Ministers have the power to schedule the site and in such circumstances scheduled monument consent must be required before works can continue (*ibid*., 133: para 6.1.27).

1.4.6 Where a heritage asset will be lost, either in part or in whole, as a result of development, the local planning authority "*…must be satisfied that the developer has secured appropriate and satisfactory provision for their recording and investigation, followed by the analysis and publication of the results and the deposition of the resulting archive in an approved repository*" (*ibid*.).

Local Planning Policies

1.4.7 The Site lies within the administrative area of Wrexham County Borough Council, who had previously adopted the Wrexham County Borough Local Development Plan 2 (LDP2) in December 2023 but has since been un-adopted. The local development plan for Wrexham now comprises the Future Wales national plan and the Wrexham Unitary Development Plan (UDP) adopted in 2005 (Wrexham County Borough Council 2025) (see Planning Statement Chapter 4.0 for detailed analysis of the status and appropriate weight to be afforded to the relevant policies of the LDP2 and UDP).

1.4.8 The UDP includes the following policies relevant to this assessment:

Policy EC9 Listed Buildings of Special Architectural or Historic Interest

Alterations or additions to, and development or redevelopment within the curtilage of, buildings or structures listed as of special architectural or historic interest must respect the setting and character of the listed buildings or structures (Wrexham County Borough Council 2005, 22).

Policy EC11 Archaeology

Development which would adversely affect the site or setting of a Scheduled Ancient Monument or archaeological site of national significance will not be permitted. Development

that directly affects non-scheduled sites of archaeological importance will only be permitted if an archaeological investigation has been carried out to determine the nature, extent and significance of the remains, and this investigation indicates that in-situ preservation is not justified, and a programme of excavation and recording has been agreed. Development will also be carefully controlled to ensure that the setting of non-scheduled sites of archaeological importance is not harmed where appropriate (*ibid*., 23).

1.4.9 The policies of the un-adopted LDP2 which are relevant to this assessment broadly follow the same direction as the UDP policies above and reflect the national policy of only supporting developments which conserve, protect, preserve, or enhance cultural and historic assets of the County Borough (Wrexham County Borough Council 2023, 67).

Technical Advice Note (TAN) 24: The Historic Environment

1.4.10 The Welsh Government published *Technical Advice Note (TAN) 24: The Historic Environment* in May 2017 with purpose of supplementing PPW and to "*provide guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning and Listed Building applications*" (Welsh Government 2017, 5).

1.4.11 TAN 24 notes that the historic environment is defined as "*all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and deliberately planted or managed*" and that a historic asset is defined as "*an identifiable component of the historic environment. It may consist or be a combination of an archaeological site, a historic building or area, historic park and garden or a parcel of historic landscape. Nationally important historic assets will normally be designated*" (*ibid*., 6).

1.4.12 TAN 24 requires assessments to consider "*the potential impacts of a development proposal on the significance of any historic asset/assets and to assist in decision making where the historic environment is affected by the planning process*" (*ibid*., 7). These assessments should make reference to the *Conservation Principles for the Sustainable Management of the Historic Environment* which were published in 2011 and include the following six principles:

1. Historic assets will be managed to sustain their values;
2. Understanding the significance of historic assets is vital;
3. The historic environment is a shared resource;
4. Everyone will be able to participate in sustaining the historic environment;
5. Decisions about change must be reasonable, transparent, and consistent; and
6. Documenting and learning from decisions is essential (Cadw 2011, 9-14).

1.4.13 These principles should be applied to ensure that change to the historic environment is managed sustainably and to ensure that any changes proposed have taken account of the

significance of heritage assets that may be affected and how any such changes may affect that significance.

Cadw Guidance

1.4.14 Cadw is the historic environment service for the Welsh Government. They have a wide-ranging role in the care and promotion of the Welsh historic environment. They provide statutory advice on planning applications.

1.4.15 Cadw's best practice guidance series '*Managing Change'* currently contains 15 guidance documents focused on a variety of topics from specific asset types to best practice in impact assessment. The most relevant in the context of this assessment are:

- Historic Environment Record in Wales: Compilation and Use (2017a);
- Managing Change to Listed Buildings in Wales (2017b);
- Managing Historic Character in Wales (2017c);
- Heritage Impact Assessment in Wales (2017d); and
- Setting of Historic Assets in Wales (2017e).

1.4.16 Cadw's setting guidance defines setting as "*the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape*" (Cadw 2017e, 2). The guidance sets out a four-stage approach to assessing the potential for impacts upon the setting of heritage assets:

> *Stage 1: Identify the historic assets that might be affected by a proposed change or development.*
>
> *Stage 2: Define and analyse the settings to understand how they contribute to the significance of the historic assets and, in particular, the ways in which the assets are understood, appreciated and experienced.*
>
> *Stage 3: Evaluate the potential impact of a proposed change or development on that significance.*
>
> *Stage 4: If necessary, consider options to mitigate or improve the potential impact of a proposed change or development on that significance* (ibid., 5-6).

1.4.17 Whilst not part of the Managing Change series, Cadw's *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* (Cadw 2011) is also relevant. The *Conservation Principles* sets out six principles, as noted above, which should be applied to ensure that change to the historic environment is managed sustainably and to ensure that any changes proposed have taken account of the significance of heritage assets that may be affected and how any such changes may affect that significance.

1.5 Planning Considerations Pertaining to the Site

1.5.2 The Local Planning Authority of Wrexham County Borough Council is advised on all archaeological matters by Heneb: The Trust for Welsh Archaeology Archaeological Planning Service (formerly the Clwyd-Powys Archaeological Trust).

1.6 Limitations of Scope

1.6.2 This assessment is based upon data obtained from publicly accessible archives as described in the Data Sources in Section 3.2 and a walkover survey. Sites and monuments within 1km of the proposed development area were assessed. An extract from the Heneb Historic Environment Record (HER) was received by AOC on the 24th June 2025. Data for designated heritage assets was accessed from Cadw in June 2025. As the Study Area extends into the English county of Shropshire, an extract from the Shropshire County Council HER was received by on AOC on 27th June 2025. The information presented in the gazetteer regarding known heritage assets is current to these dates.

1.6.3 It should be noted that the report has been prepared under the express instructions and solely for the use of Axis and their partners. All the work carried out in this report is based upon AOC Archaeology Group's professional knowledge and understanding of current (October 2025) and relevant United Kingdom standards and codes, technology, and legislation.

1.6.4 Changes in these areas may occur in the future and cause changes to the conclusions, advice and/or recommendations given. AOC Archaeology Group does not accept responsibility for advising Axis or associated parties of the facts or implications of any such changes in the future.

2 Aims and Objectives

2.1.1 The aim of this assessment is to identify the cultural heritage value of the site proposed for development. The evidence presented and the conclusions offered will provide a comprehensive basis for further discussion and decisions regarding heritage constraints on the future development of this site and for the formulation of a further mitigation strategy, should this be required.

2.1.2 The objectives to be undertaken in pursuing this study will be focused on assessing the heritage significance of the Site by examining a variety of evidence for upstanding and buried remains of heritage interest including World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Historic Landscapes, Registered Historic Parks and Gardens, and non-designated assets within 1km of the potential development area. The assessment is based upon data obtained from publicly accessible archives as described in Data Sources (Section 3.2).

3 Methodology

3.1 Standards

3.1.1 The scope of this assessment meets the requirements of current planning regulations set out in the *Planning Policy Wales 12* (Welsh Government 2024); the *Ancient Monuments and Archaeological Areas Act 1979*, the *Planning (Listed Buildings and Conservation Areas) Act 1990*, the *Historic Environment (Wales) Act 2023*, the *Planning (Wales) Act 2015*, and local planning policy.

3.1.2 AOC Archaeology Group conforms to the standards of professional conduct outlined in the Chartered Institute for Archaeologists' (CIfA) *Code of Conduct* (CIfA 2022), the CIfA *Standard and Guidance for Commissioning Work or Providing Consultancy Advice on Archaeology and the Historic Environment* (CIfA 2020a), the CIfA *Standards and Guidance for Historic Environment Desk-Based Assessments* (CIfA 2020b), the CIfA *Regulations for Professional Conduct* (CIfA, 2024), and other relevant guidance.

3.1.3 AOC Archaeology Group is a Registered Organisation of CIfA. This status ensures that there is regular monitoring and approval by external peers of our internal systems, standards and skills development.

3.1.4 AOC is ISO 9001:2015 accredited, in recognition of the Company's Quality Management System.

3.2 Data Sources

3.2.1 The following data sources were consulted during preparation of this assessment:

- Cadw and Historic Wales for designated heritage asset data;
- The Heneb and Shropshire County Council HERs for records of designated and non-designated assets and previous archaeological interventions;
- The Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW) (via Coflein) for non-designated heritage data and online historic aerial photographs;
- LANDMAP for details of Historic Landscape Character Areas;
- Historic Maps held by the British Library, the National Library of Wales (NLW), and the National Library of Scotland (NLS);
- Archaeological Data Service (ADS) for heritage data including grey literature reports, and archaeological journals;
- Aerial photography images from National Monuments Record of Wales website, the Britain from Above website, the National Collection of Aerial Photography (NCAP) website and the Cambridge Collection of Aerial Photography (CUCAP) website;
- Natural Resources Wales (via DataMapWales) for any available LiDAR imagery of the Site;

- Google Earth Pro™ for current and historical satellite imagery of the Site;
- The NLW website and the Genealogist website for relevant parish Tithe maps and apportionment details;
- British Geological Survey data for information about the geological character of the Site;
- Wrexham County Borough Council's online archives for any available pre–Ordnance Survey mapping and other documentary sources; and
- Other online resources.

3.3 Report Structure

3.3.1 Each heritage asset referred to in the text is listed in the Gazetteer in Appendix 1. Each has been assigned an 'Asset/Event No.' unique to this assessment, and the Gazetteer includes information regarding the type, period, grid reference, Cadw/HER reference number, statutory protective designation, and other descriptive information, as derived from the consulted sources.

3.3.2 Each heritage asset referred to in the text is plotted on the location maps (Figure 2) at the end of the report, using the assigned Asset/Event No's. The proposed development area is shown outlined in red.

3.3.3 All features of potential heritage significance located within a 1km radius of the edge of the proposed development area have been included in the assessment. The aim of this is to help predict whether any similar hitherto unknown archaeological remains survive within the proposed development area.

3.3.4 The 1km Study Area has also been used to inform the potential impacts to the settings of designated heritage assets as a result of the Proposed Development. It is anticipated that there would be no visibility of the Proposed Development beyond this Study Area.

3.3.5 All sources consulted during the assessment, including publications, archived records, photographic and cartographic evidence, are listed amongst the References in Section 7.

3.4 Assessment Criteria

3.4.1 The assessment aims to identify the known and likely archaeological potential of the Site and the relative value or importance of such a resource/asset. The criteria for assessing these factors are laid out in detail in Appendix 2.

3.4.2 The criteria for assessing archaeological potential are expressed in this report as ranging between the scales of High, Medium, Low, and Uncertain, criteria for which are also noted in Appendix 2.

3.4.3 Levels of importance in the report are expressed as ranging between the scales of Very High, High, Medium, Low, Negligible, and Unknown. The importance of heritage assets is determined firstly by reference to existing designations – for example Scheduled Monuments

are already classified as Nationally Important and therefore of High importance. For assets where no designation has previously been assigned, the likely importance of that resource has been based upon the available evidence and professional knowledge and judgement.

3.4.4 The likely magnitude of the impact of the Proposed Development works is determined by identifying the degree of change from the Proposed Development upon the 'baseline' conditions of the Site and the heritage resource identified in the assessment. This impact can be either adverse (negative), beneficial (positive) or neutral and is ranked according to the scale of high, medium, low, negligible, or neutral.

Assessment of Setting Impacts

3.4.5 The setting assessment has been undertaken in line with the requirements of PPW 12 and Cadw's setting guidance.

3.4.6 The definition of setting in PPW 12 is outlined in TAN 24 as:

The setting of a historic asset includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Setting is not itself a historic asset, though land within a setting may contain other historic assets (Welsh Government 2017, 47).

3.4.7 Cadw further defines the setting of a historic asset, stating that:

Setting often extends beyond the property boundary of a historic asset and into the surrounding landscape or townscape. Although many historic assets are visible and their settings are obvious, those that are buried also have a setting.

The setting of a historic asset can include physical elements of its surroundings. These may be boundary walls, adjacent fields or functional and physical relationships with other historic assets or natural features, the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape (Cadw 2017e, 2).

3.4.8 Cadw also notes that a number of factors may contribute to setting and that elements of setting may make a positive, neutral, or negative contribution to the significance of an asset.

3.4.9 The guidance sets out the ways in which setting may contribute to the value of a heritage asset. It advocates a four-stage approach which comprises:

Stage 1: Identify the historic assets that might be affected by a proposed change or development;

Stage 2: Define and analyse the settings to understand how they contribute to the significance of the historic assets and, in particular, the ways in which the assets are understood, appreciated and experienced;

Stage 3: Evaluate the potential impact of a proposed change or development on that significance;

Stage 4: If necessary, consider options to mitigate or improve the potential impact of a proposed change or development on that significance (*ibid*., 5-6).

3.4.10 The guidance provides a checklist of potential attributes of setting which may contribute to or make appreciable the significance of the asset in question.

3.4.11 The assessment of the impact on setting undertaken for this assessment has followed the staged approach outlined in the Cadw guidance on setting. In the interest of being proportionate to the importance of the asset and the potential magnitude of impact, the assessment only discusses those attributes which apply to the asset and the potential impacts.

3.4.12 Site visits were undertaken to all designated heritage assets within the 1km Study Area. These site visits established the current setting of the assets, how setting contributes to the significance and appreciation of the assets and how the Proposed Development could potentially impact upon setting, such that it could cause harm and affect significance.

3.4.13 It is noted that, in many cases identified effects upon setting are 'neutral' and as such, it is not always necessary or appropriate to propose mitigation or enhancement measures. Where relevant, mitigation and enhancement measures are identified as part of this assessment.

Assessment of Direct Impacts

3.4.14 The assessment of Direct Impacts will be undertaken in line with the assessment criteria noted above and in Appendix 2. This will be done by establishing the historic environment baseline through examination of the data sources outlined in Section 3.2 and a walkover survey. The Proposed Development will be assessed against the established historic environment baseline, and potential direct impacts on known and unknown heritage assets will be identified.

Assessment of Harm

3.4.15 PPW 12 states that "*it is important that the planning system looks to protect, conserve and enhance the significance of historic assets"* and that "*any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way*" (Welsh Government 2024, 130: para 6.1.7).

3.4.16 Cadw's *Conservation Principles* defines 'harm' as a "*change for the worse, here primarily referring to the effect of inappropriate interventions on the heritage values of an historic asset"* (Cadw 2011, 36), and states that changes which cause harm to the heritage values of an historic asset will be unacceptable unless:

a. the changes are demonstrably necessary either to make that asset sustainable, or to meet an overriding public policy objective or need; and

b. there is no reasonably practicable alternative means of doing so without harm; and

c. that harm has been reduced to the minimum consistent with achieving the objective; and

d. it has been demonstrated that the predicted benefit decisively outweighs the harm to the values of the asset, considering:

- *its comparative significance;*
- *the impact on that significance; and*
- *the benefits to the asset itself and/or the wider community or society as a whole* (*ibid*., 30).

3.4.17 The final section of the *Conservation Principles* identifies how consideration can be given to how the historic environment can be accommodated alongside other interests and where enabling development may be acceptable to secure the future of an important historic asset. This part of the document provides tests against which different aspects of a development proposal can be judged (*ibid*., 21-34).

3.4.18 There are no designated heritage assets within the Site and as such will be no direct impacts upon designated heritage assets and no harm. In the case of the Proposed Development the potential for harm upon designated heritage assets relates solely to potential impacts upon their settings.

3.4.19 Assessment of harm resulting from impacts upon the setting of designated heritage assets will relate to whether a change would seriously adversely affect those attributes or elements of the setting of a designated asset that contribute to, or give it, its significance resulting in change for the worse. This will be considered in line with the criteria for magnitude of impact. However, it should be noted that change will not always lead to harm and that there is potential for beneficial as well as neutral impacts. Where there are beneficial, neutral or no impacts there will be no harm.

4 Archaeological and Historical Evidence

4.1 Prehistoric and Roman (c.250,000 BC to AD 410)

4.1.1 There is a single record in the HER of prehistoric evidence within the 1km Study Area. In 1879 three or four dugout canoes (Asset 15) were reportedly found near the old Fenn's Hall Farm c.790m northwest of the Site and were being used as pig troughs. These are recorded as being prehistoric although it is not known if the canoes are still present or how they were assessed as being prehistoric.

4.1.2 There are no Roman heritage assets recorded in the HER within the Site or 1km Study Area.

4.1.3 Overall, due to the paucity of prehistoric and Roman assets within the Site and the 1km Study area and the industrial development of the Site in the 20th century, there is considered to be a Low potential for previously undiscovered prehistoric and/or Roman assets within the Site.

4.2 Medieval (AD 410 to 1485)

4.2.1 There are no medieval heritage assets recorded within the Site and two medieval heritage assets recorded in the 1km Study Area.

4.2.2 Fenn's Wood (Asset 3) is a managed woodland first recorded in 1284. During the 13th and 14th century the wood was assarted and provided common rights of housebote, haybote, and pannage. The woodland is located c.900m south of the Site and runs along the northeastern edge of Fenn's, Whixall and Bettisfield Mosses National Nature Reserve.

4.2.3 A possible medieval moated site (Asset 9) is located in the central courtyard of Fenn's Old Hall Farm (Asset 24), believed to be the location of a medieval hall belonging to the Hanmer family. The Hanmer family's association with the area dates back to 1331 when Philip Hanmer was granted lands in Iscoed, Wales. His grandson Jenkin Hanmer may have acquired the land where the hall sits from his first wife Margaret verch Dafydd in the early 14th century (Lundy 2011). A post-medieval farm now sits on the site of the hall.

4.2.4 Overall, due to the paucity of medieval assets within the Site and the 1km Study area and the industrial development of the Site in the 20th century, there is considered to be a Low potential for previously undiscovered medieval assets within the Site.

4.3 Post-Medieval (AD 1485 to 1900)

4.3.1 The majority of the records within the HER date to the post-medieval period, although there are no post-medieval assets recorded within the Site. There are no post-medieval assets within the Site boundary. Within the 1km Study Area there is one Grade II Listed Building (Asset 1) and a number of non-designated heritage assets (76 individual HER records, however these have been collated into 26 asset entries in the Gazetteer to reduce duplication). The character of the landscape within the 1km Study Area appears to have

remained agricultural throughout the post-medieval period until the 19th century, as depicted on historic maps of the period.

4.3.2 Early pre-Ordnance Survey maps of the Site tend to be schematic and lacking in detail, although they give some idea of the nature of settlement in the surrounding area. The earliest maps of the region, such as those by Ortelius (1592, Figure 3a) and Blaeu (1662, Figure 3b) show very little detail of the region other than the medieval settlements of Whitchurch and Hanmer. Fenn's Hall is also recorded on the Blaeu map. As cartographic techniques progressed in the 18th century, more detail becomes visible, as seen on the map by Cary (1794, Figure 3c), in which more details of settlements and topography are seen as well as road networks.

4.3.3 The Tithe Apportionment map and Ordnance Survey (OS) maps of the 19th century show the landscape in more detail, including field boundaries and individual buildings. The 1839 Tithe map (Figure 3d) shows the Site and surrounding area and records the land use at the time. The Tithe Apportionment details describe the two plots in the Site as being used for pasture and oats under the ownership of Sir John Hanmer.

4.3.4 The Grade II Listed Building recorded in the 1km Study Area is an early 18th century barn (Asset 1) located at Fenn's Old Hall Farm (Asset 24). The farm is named for the former medieval hall believed to be located here as noted above. The layout of the farm and the complex of buildings can be seen on the historic Ordnance Survey maps of 1878 and 1901 (Figures 4a and 4b). A farm building (Asset 11) was depicted on the 1878 OS map (Figure 4a) located on the western side of Fenn's Bank road opposite the Old Fenn's Hall Farm. This building has since been demolished. A number of other post-medieval farmsteads are located within the 1km Study Area, including Fenn's Bank (Asset 2), Conery Farm (Assets 21 and 27), Fenn's Wood Farm (Asset 25), Pinfold Farm (Asset 26), and Lower Blackoe Farm (Asset 28).

4.3.5 The late 18th and early 19th centuries saw an increase in the industrial use of the landscape, including the Fenn's Bank Brick and Tile works (Asset 16) and Fenn's Bank Lime Works (Asset 4). A number of sand, clay, and marl pits associated with these works are also recorded within the 1km Study Area (Assets 5, 6, 12, and 14). The Brick and Tile works has since been replaced with a modern aluminium works.

4.3.6 The introduction of industrial infrastructure also changed the landscape within the 1km Study Area, starting with the Ellesmere Canal (Asset 33) at the end of the 18th century. The construction of the canal began in 1794 and was completed in the early 19th century. There are four bridge crossings within the 1km Study Area: two footbridges (Assets 29 and 32); a road bridge (Asset 31); and a railway bridge (Asset 31) for the former Oswestry, Ellesmere and Whitchurch railway (Asset 34). The railway line and the station at Fenn's Bank (Asset 8) was opened in 1863 and closed in 1965. Railway sidings associated with the Brick and Tile works are also recorded (Assets 10 and 18).

4.3.7 The Site is likely to have historically been within pasture or cultivated fields for a local tenant farmer during most of the post-medieval period. Itis likely the entire area of the Site remained largely been undisturbed (other than agricultural activities, *i.e.* ploughing and drainage) until the modern period. Any potential archaeological evidence from the post medieval period would likely to be related to this agricultural use or the brickworks to the south and would be considered to be of Low importance.

4.4 Modern (AD 1900 to present day)

4.4.1 The OS maps of the 20th century show very little change within the Site, other than the introduction of additional field boundaries shown on the OS maps of 1901 (Figure 4b), 1954 (Figure 4c), and 1971 (Figure 4d).

4.4.2 Although not shown on the maps, a large army camp was established at Fenn's Bank in 1916 during the First World War (Asset 22, c.280m east of the Site). This camp had the capacity for up to 1000 troops and also included two rifle ranges (Assets 13 and 23). An additional railway siding (Asset 19) was also created to accommodate troops for the camp. After the war, the camp and the rifle ranges became redundant and were soon demolished.

4.4.3 At the end of the 20th century, the Befesa Salt Slags were constructed at the Site. The majority of the buildings associated with these works are still present on the Site today.

4.4.4 There is a Low potential for any modern unrecorded archaeological remains within the Site, other than those associated with the Befesa Salt Slags. Any such remained would be considered to be of Low importance.

4.5 Previous Archaeological Works (Events)

4.5.1 The HER records two previous archaeological events within the 1km Study Area. These are a photographic survey of the stables at Conery Farm in 2016 (Event 35) and a Heritage Impact Assessment (HIA) at Blackoe Farm in 2022 (Event 36).

4.5.2 In addition to the two events recorded within the 1km Study Area, there have been various assessments covering a range of topics which have been carried out across the full extent of Powys and north Wales, including surveys of prehistoric monuments, medieval settlements, and First and Second World War defences. For the purposes of this assessment these have been grouped together as Event 37 and a full list of the assessments is provided in the Gazetteer in Appendix 1.

4.6 Aerial Photography and LiDAR Imagery

4.6.1 A search of the online aerial photographs held by the National Library of Wales (NLW) and the Cambridge University Collection of Aerial Photographs (CUCAP) was undertaken in July 2025 (see Section 7.3). Five oblique photographs were available showing the Site and the Fenn's Old Hall Farm between 1968 and 2009. No other previously unrecorded archaeological features were identified on these photographs. No aerial photographs of the Site were

available on the National Collection of Aerial Photography (NCAP) website, Britain from Above website, or Historic England's online Aerial Photo Explorer.

4.6.2 Historic satellite imagery available from Google Earth ProTM shows the Site from December 2006 to June 2023 (Figure 5). The satellite images show the Befesa Salt Slag works within the Site. No other previously unrecorded features were seen on the satellite imagery.

4.6.3 LiDAR (Light Detection And Ranging) is a remote sensing technique which describes a method of determining three-dimensional (3D) data points by using a laser. Airborne LiDAR consists of an active laser beam being transmitted in pulses from a fixed-wing or rotary aircraft and the returning reflection being measured. The first returns are considered equivalent to the digital elevation model of the land surface; it records the highest points, including buildings and the woodland canopy. The DTM (Digital Terrain Model) is a digital elevation model of the bare earth, i.e. the ground beneath any vegetation with other structures such as buildings removed. The LiDAR data available from NLS and DataMap Wales shows the potential moated site at the Fenn' Old Hall Farm (Asset 9). No unrecorded heritage assets within the Site were seen on the LiDAR data.

4.7 Walkover Survey

4.7.1 A walkover survey of the proposed development area was undertaken to investigate the condition and significance of known archaeology on the Site with the aim of identifying any previously unknown remains.

4.7.2 The survey was conducted on the 26th June 2025 in sunny and slightly cloudy conditions with a strong breeze and clear visibility. The Site is comprised of a front carpark with a reception/admin building surrounded by both grass covered ground (Plate 1), and a small wetland. The pre-existing factory is inside of a controlled fenced area accessed from the unnamed road running from Fenn's bank to the Mereside industrial park. Some of the auxiliary buildings have already been demolished but can be seen on historical satellite images (Figure 5) and their rubble piles sit in the southwest corner of the hardstanding. The factory is two large rectangular sheds with offices on the northeast side. They are steel framed buildings with prefabricated metal cladding and PVC roofs. A paved road circles the hardstanding/factory. There are a few sundry small buildings/sheds on the outside of this road such as a pump station. The ground outside of the hardstanding on the northwest side is overgrown and tarmac and on the southeast side is marshy ground containing a large water reservoir installed for the Salt Slags facility. The Site is mostly fenced with very limited visibility outside of the boundary, especially during spring and summer months of the year.

4.7.3 The walkover survey was conducted around the reception buildings, over the carpark, and over the hardstanding and circle road within the factory compound (Plates 1 to 5). It was not conducted inside the factory sheds or over the marshy ground because of safety concerns. No previously unrecorded heritage assets were identified during the survey.

5 Setting Assessment

5.1 Setting Assessment Criteria

5.1.1 This section considers the potential for the Proposed Development to impact upon the settings of designated heritage assets within 1km of the Site. This includes consideration of whether any such change would constitute an adverse impact (diminishment) to those attributes of the designated assets which directly contribute to their significance rather than simply being an alteration to, or addition of a new element to the existing settings of these assets. Where a new development may be located within the setting of an asset but does not diminish the significance of the asset or the ability to appreciate that significance, it may have a neutral impact.

5.1.2 The assessment considers all designated heritage assets within 1km of the Site. Visits were undertaken to every identified heritage asset to confirm the potential for setting impacts and in most cases intervening topography, built structures and vegetation was noted to completely obscure any potential intervisibility. Where vegetation has been listed as a screening factor it should also be noted that the survey was undertaken in June and that in the autumn and winter months the level of screening provided will likely be lower.

5.2 Assets Considered for Setting Assessment

Fenn's Old Hall Barn

5.2.1 There is only one designated heritage asset within the 1km Study Area that has the potential for setting impacts: the 18th century Grade II Listed Fenn's Old Hall Barn (Asset 1) in Fenn's Old Hall Farm (Asset 24, Plate 7). The barn is set within an agricultural landscape and forms part of the farmsteads complex of buildings which enclose a central courtyard.

5.2.2 There is no intervisibility between the farm and the Site as it is well screened from the Salt Slags factory by a combination of a berm which encircles the fallow fields on the north edge of the Site, and by the Fenn's Bank road embankment with established trees and hedgerow, and the trees and hedges along the northern edge of the pasture between the Site and the Farm (Plate 6). The barn itself is largely shielded from the road by the later farm buildings. During autumn and winter the trees will provide less screening of the Salt Slag facility and the top half of the factory sheds will likely be visible from parts of Fenn's Bank road.

5.2.3 The Proposed Development would not add any significantly larger buildings than those currently present within the Site. Whilst the Proposed Development may be partially visible, this would only be a barely perceptible change to the setting of the barn, a change that would not diminish or enhance the significance of the asset or the ability to appreciate its significance and would result in a Neutral impact. Consequently, no harm to this asset is predicted, and the significance of the historic asset as set out in PPW 12 (para 6.1.7) is not affected.

6 Impacts and Mitigation

6.1 Direct Impacts

6.1.1 Potential impacts on known or unknown buried archaeological remains which may survive relate to the possibility of disturbing, removing, or destroying in situ remains and artefacts during ground-breaking works (including excavation, construction, and other works associated with the Proposed Development) on this Site. In the context of this development, direct impacts have the capacity to result in impacts of high magnitude as they could result in the destruction or removal of any present archaeological deposits.

6.1.2 This assessment has identified that the Site was largely agricultural in nature until the development of the Befesa Salt Slags at the end of the 20th century. Whilst there may be a High potential for post-medieval agricultural or industrial archaeological remains to be present within the Site, these would be considered to be of Low importance and are likely to have been destroyed by the 20th century development. There is a Low potential for previously undiscovered prehistoric, Roman, medieval, or modern archaeological remains to be present within the Site.

6.2 Settings Impacts

6.2.1 All designated heritage assets within the 1km Study Area were considered for potential impacts to their setting as a result of the Proposed Development. This includes consideration of whether any such change would constitute an adverse impact (diminishment) to those attributes of the designated assets which directly contribute to their significance rather than simply being an alteration to, or addition of a new element to the existing settings of these assets. The setting assessment was undertaken in line with the requirements of PPW 12 and Cadw setting guidance.

6.2.2 There is only one designated heritage asset within the 1km Study Area that has been considered for setting impacts: the 18th century Grade II Listed Fenn's Old Hall Barn (Asset 1). Whilst the Proposed Development may be partially visible, this would only be a barely perceptible change to the setting of the barn, a change that would not diminish or enhance the significance of the asset or the ability to appreciate its significance and would result in a Neutral impact. Consequently, no harm to this asset is predicted, and the significance of the historic asset as set out in PPW 12 (para 6.1.7) is not affected.

6.3 Mitigation

6.3.1 National planning policies and planning guidance contained within the Planning Policy Wales (Welsh Government 2024), as well as local planning policies require a mitigation strategy that is designed to take cognisance of the possible impacts upon heritage assets by a Proposed Development on the Site and avoid, minimise, or offset any such impacts as appropriate.

6.3.2 This assessment has indicated that whilst there may be potential for previously unrecorded archaeological remains to be present within the Site, it is likely that these would have been destroyed by the modern 20th century developments. In accordance with national and local planning policies on heritage, it is recommended that a watching brief is carried out during any groundworks required as part of the Proposed Development. If significant features are encountered, further archaeological works, including full excavation and a programme of post-excavation, works may be required. The scope and details of any further works would be agreed in consultation with Heneb.

6.3.3 CIfA (2021) and The Association of Local Government Archaeological Officers (ALGAO) (Mann 2023) have recently noted the need for public benefit in archaeology. In this case if a programme of public engagement and/or enhancement were to be considered, engagement could include desk-based, digital and on-site interpretation and dissemination about any archaeological remains which may survive on the Site or to wider archaeological and historical information around the area. The scope and requirement of any public benefit should be agreed by the Client and be undertaken in consultation with the Client and Heneb.

6.3.4 As set out above, there is only one designated heritage asset within the 1km Study Area that has been considered for setting impacts: the 18th century Grade II Listed Fenn's Old Hall Barn (Asset 1). As the predicted impacts to the setting of the asset as a result of the Proposed Development would be a Neutral impact, and consequently no setting mitigation is considered necessary.

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7.2 Cartographic References

The following maps were consulted in July 2025 through the National Library of Scotland (NLS) website (http://maps.nls.uk), Old Maps Online (https://www.oldmapsonline.org/), and The Genealogist (https://www.thegenealogist.co.uk/):

Ordnance Survey Six Inch Series

1878. *Flintshire Sheet XXVI. Surveyed: 1873, Published: 1878*. https://maps.nls.uk/view/102342393

1914. *Flintshire Sheet XXVI.NE. Revised: 1909, Published: 1914*. https://maps.nls.uk/view/102182062

1929. *Flintshire Sheet VII.NE. Revised: 1924, Published: 1929*. https://maps.nls.uk/view/101593489

1934. *Flintshire Sheet VII.NE. Revised: 1924, Published: 1934*. https://maps.nls.uk/view/102193426

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Ordnance Survey 25 Inch Series

1893. *Shropshire VII.7. Surveyed: 1872 to 1879, Published: 1893*. https://maps.nls.uk/view/121147691

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1971. *SJ5039-SJ5139-AA. Revised: 1970, Published: 1971*. https://maps.nls.uk/view/188904858

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7.3 Aerial Photography

The following aerial photographs were viewed online in June 2025 using the Cambridge University Collection of Aerial Photography (CUCAP) and the National Library of Wales (NLW) via Coflein:

Date	Sortie/Flight Reference	Photo/Frame Number	Type	Link
10/06/1968	35kQ012	n/a	Oblique	https://www.cambridgeairphotos.com/location/35kq012/
18/05/1970	BBK43	118	Oblique	https://www.cambridgeairphotos.com/location/bbk43/
22/12/2003	AP955018	46-9	Oblique	https://coflein.gov.uk/en/site/309695/images
22/12/2003	AP955018	50-1	Oblique	https://coflein.gov.uk/en/site/309696/images
21/01/2009	SJ53NW	413422	Oblique	https://coflein.gov.uk/en/site/413422/images

Plates



Plate 1: View west of the entrance to the Site



Plate 2: View southwest of the northwest side of the former factory on Site



Plate 3: View east of west end of Site



Plate 4: View northeast along eastern side of Site



Plate 5: View northwest of pond and factory on Site from Fenn's Bank Road

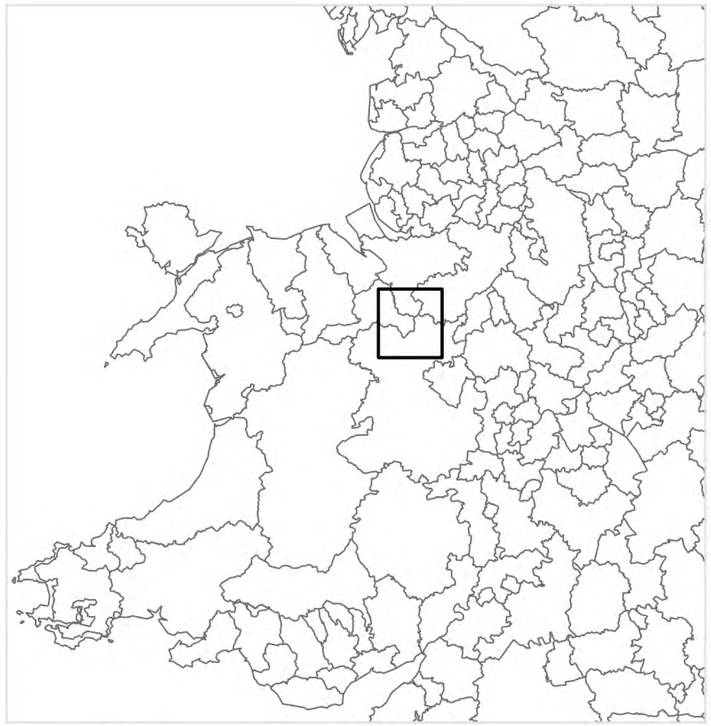


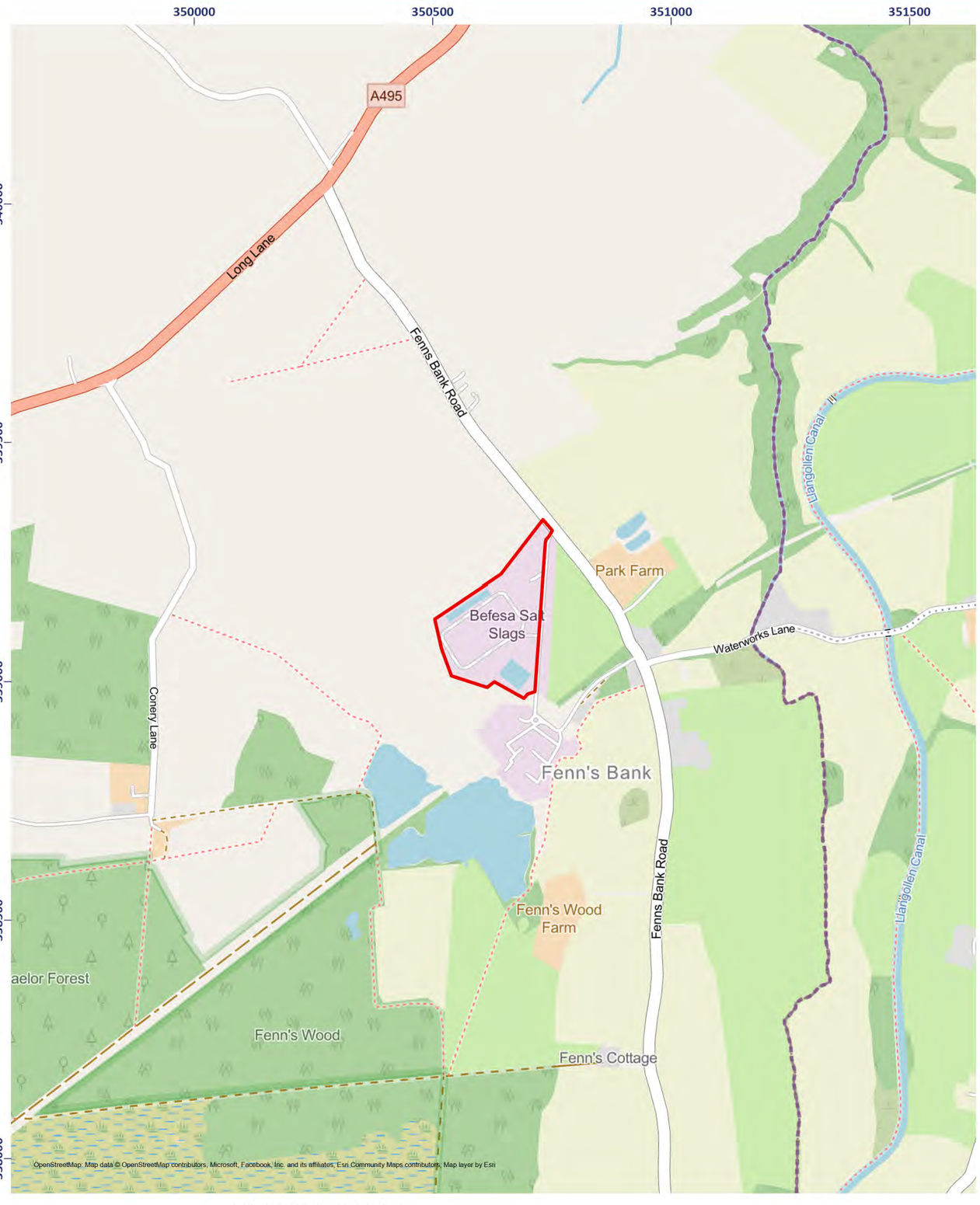
Plate 6: View south towards the Site from the entrance to Old Fenn's Hall farm (Asset 1)



Plate 7: View north of Old Fenn's Hall Farm (Asset 1)

Figures





N

Legend

Site Boundary

0 1:10,000 500 m

@A3

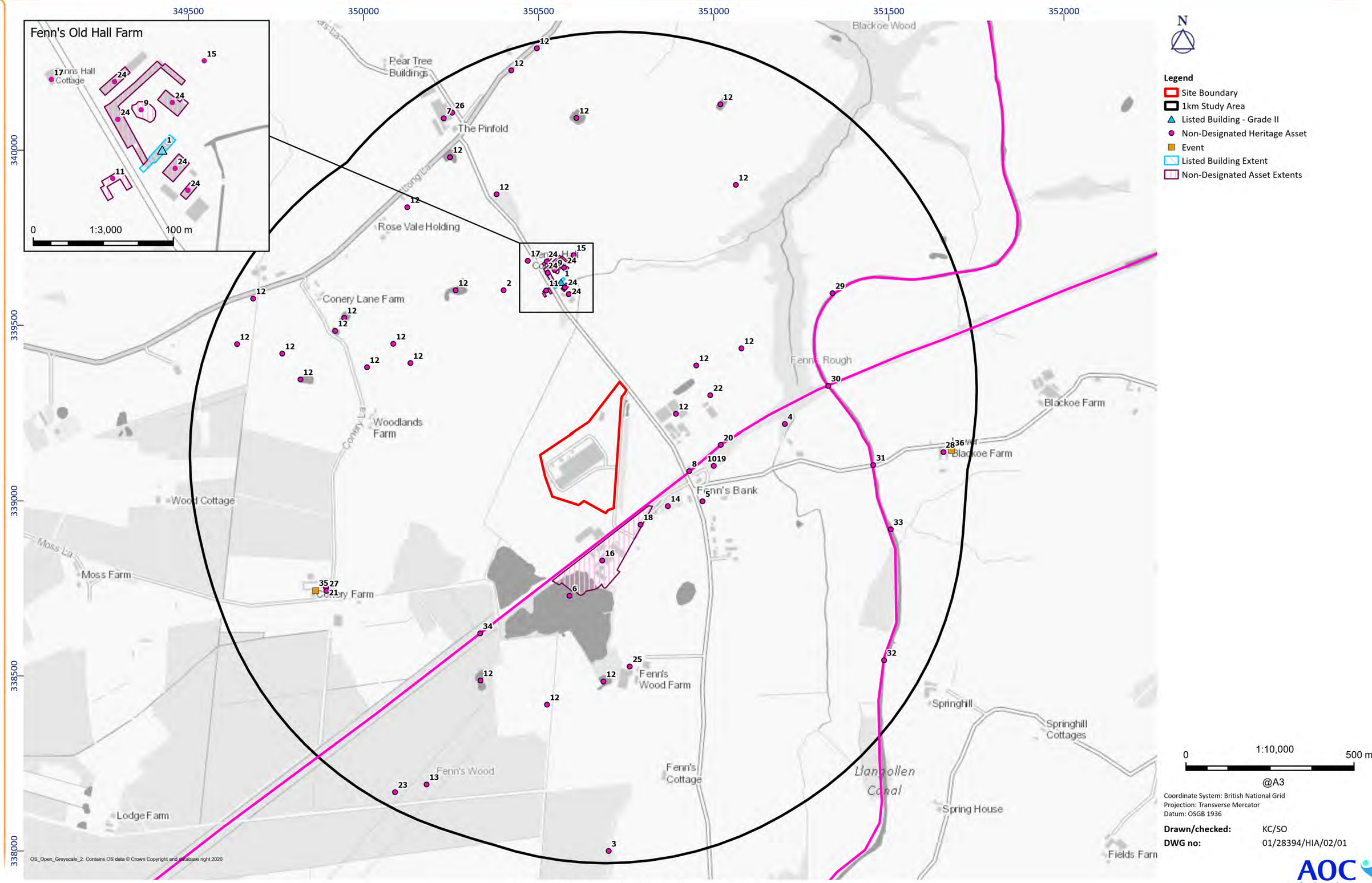
Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Drawn/checked: KC/SO

DWG no: 01/28394/HIA/01/01

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Figure 1: Site Location



Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

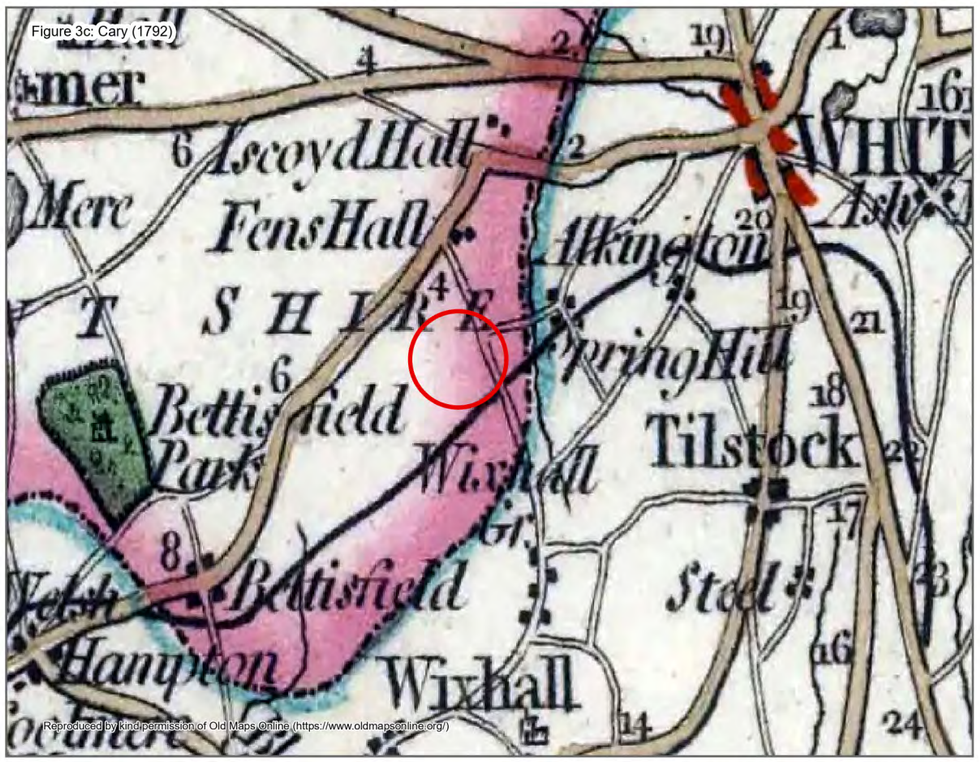
Drawn/checked: KC/SO

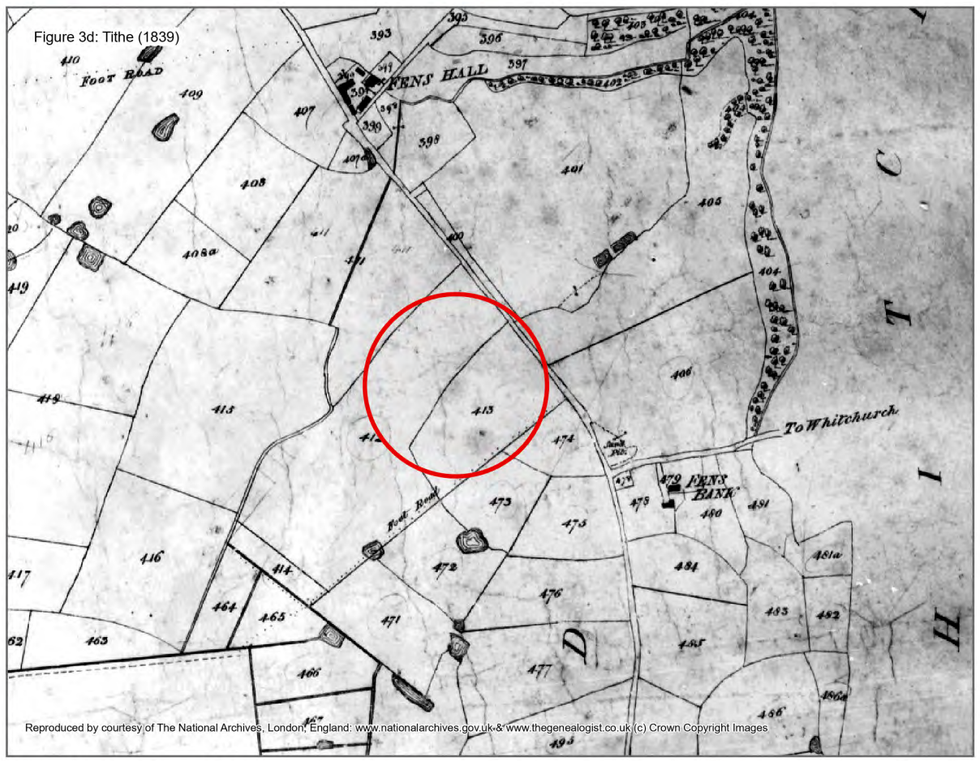
DWG no: 01/28394/HIA/02/01

Figure 2: Heritage Assets and Events within 1km Study Area









N

Legend

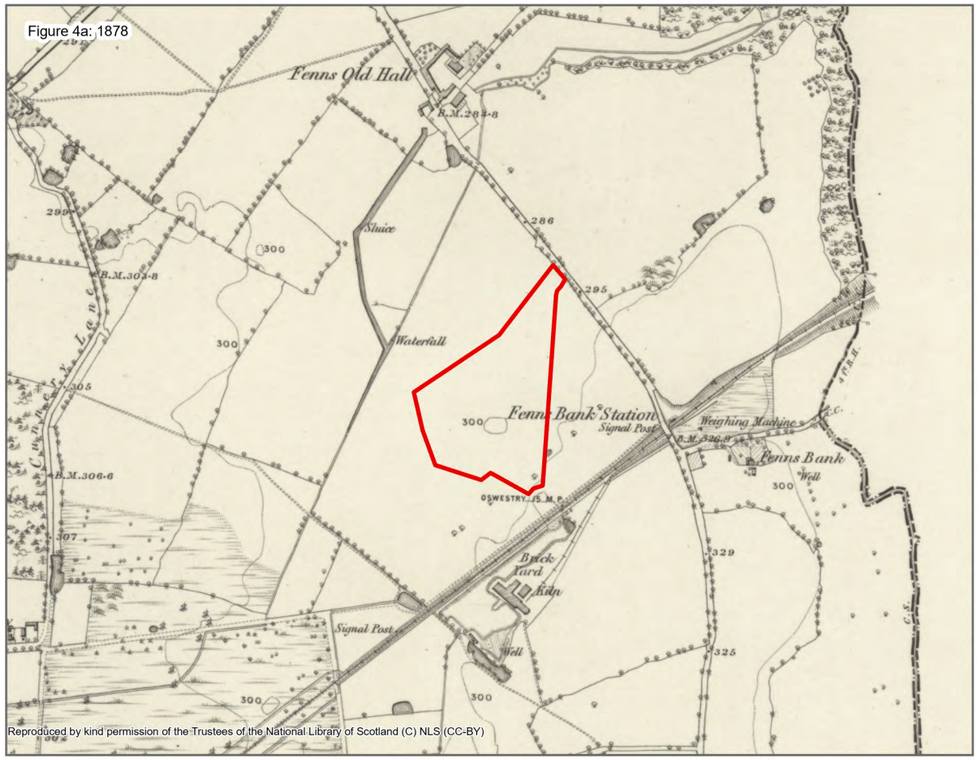
Approximate Site Location

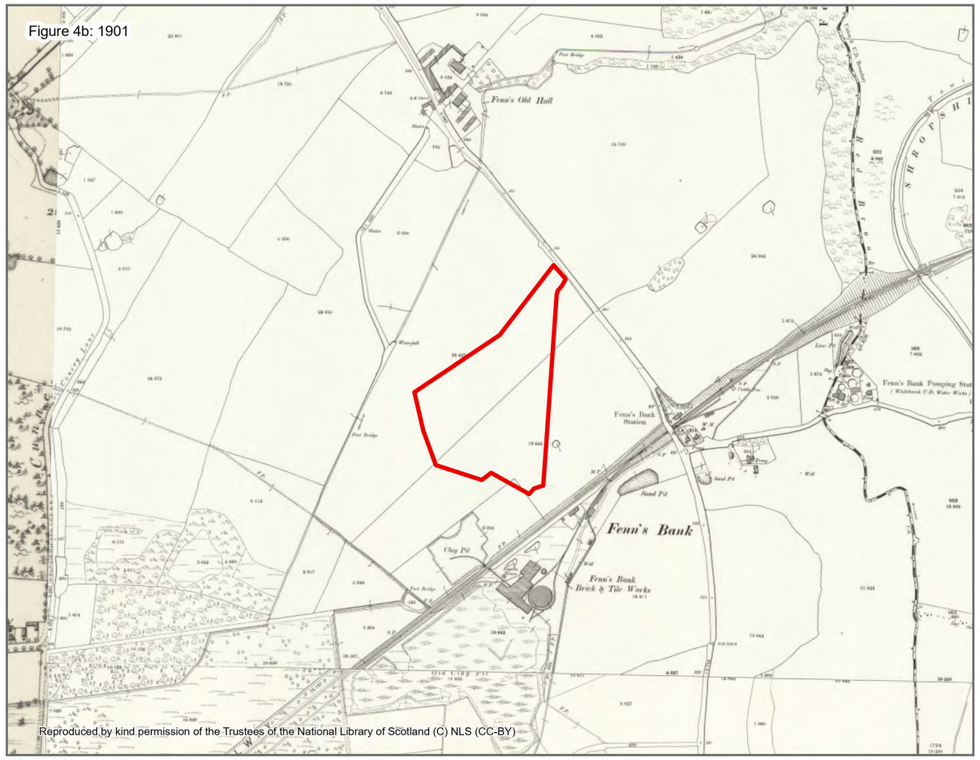
NOT TO SCALE

Drawn/checked: KC/SO

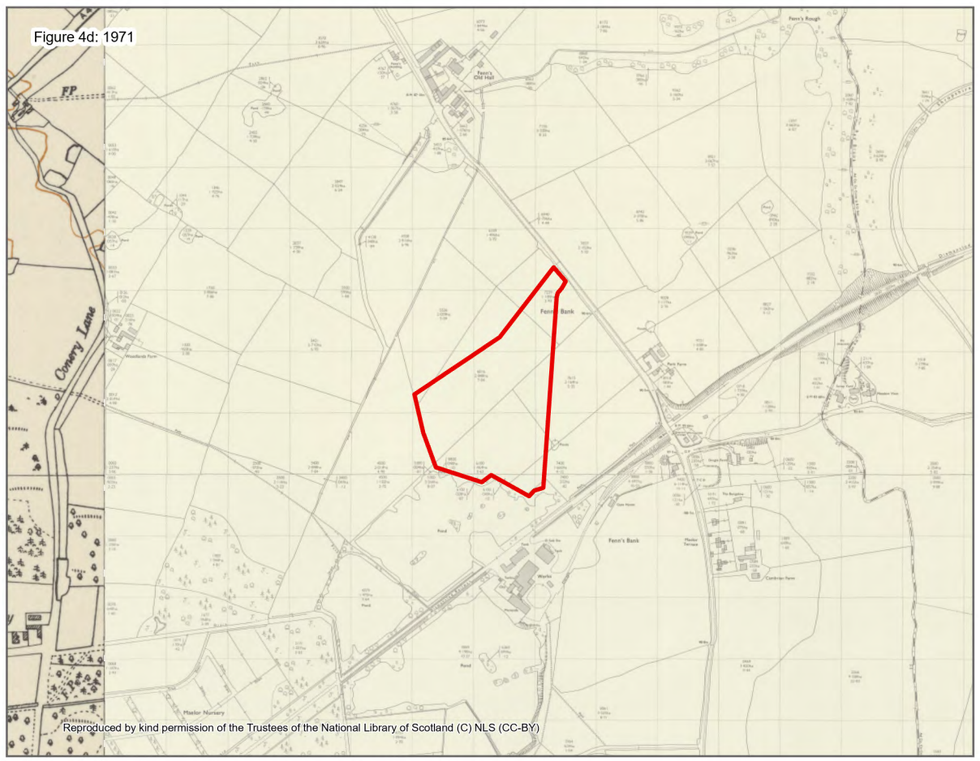
DWG no: 01/27992/HIA/03/01

Figure 3: Extracts from maps by Ortelius (1592), Blaeu (1662), Cary (1794), and the 1839 Tithe Map









N

Legend

Site Boundary

0 1:10,000 500 m

@A3

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Drawn/checked: KC/SO

DWG no: 01/27992/HIA/04/01

Figure 4: Extracts from Ordnance Survey maps (1878, 1901, 1954, and 1971)



Figure 5: Extract from Satellite Imagery, June 2023

Appendix 1. Gazetteer of Heritage Assets and Events

Asset/ Event Number	Asset/Event Name	Status	Cadw/HER Reference	Type of Asset/Event	Period	Easting	Northing	Description
1	Fenns Old Hall, barn	Listed Building - Grade II	97315	Barn	Post-Medieval	350564	339624	An early 18th century barn associated with Fenns Old Hall, which was a Hanmer family residence until William Hanmer purchased Iscoyd Park in 1739.
2	Fenn's Bank, Fenns Holdings	Non-Designated Heritage Asset	26959	Barn	Post-Medieval	350400	339600	A former barn converted into a dwelling in 1996.
3	Fenn's Wood	Non-Designated Heritage Asset	35022	Managed Woodland	Medieval	350700	338000	Fenn's Wood was recorded first in 1284. During the 13th and 14th century the wood was assarted but also provided common rights of housebote, haybote and pannage.
4	Fenn's Bank lime pit	Non-Designated Heritage Asset	37173	Lime Works	Post-Medieval	351203	339218	The Lime Works is shown on the OS 6-inch Flintshire XXVI NE Map (Published 1900).
5	Fenn's Bank sand pit I	Non-Designated Heritage Asset	37174	Sand Pit	Post-Medieval	350968	338999	The Sand Pit is shown on the OS 6-inch Flintshire XXVI NE Map (Published 1900).
6	Fenn's Bank old clay pit	Non-Designated Heritage Asset	37176	Clay Pit	Post-Medieval	350588	338729	The Clay Pit is shown on the OS 6-inch Flintshire XXVI NE Map (Published 1900).
7	Pinfold Farm pound	Non-Designated Heritage Asset	37177	Pound	Post-Medieval	350229	340091	Pound is suggested by place-name shown on the OS 6-inch Flintshire XXVI NE map (Published 1900)
8	Oswestry, Ellesmere and Whitchurch Railway, Fenn's Bank railway station	Non-Designated Heritage Asset	37179	Railway Station	Post-Medieval	350930	339085	Former railway station shown on the OS 6-inch. The station was opened on the 4th of May 1863 and closed on the 18th of January 1965. The permanent buildings were constructed in the 1880s.

Asset/ Event Number	Asset/Event Name	Status	Cadw/HER Reference	Type of Asset/Event	Period	Easting	Northing	Description
9	Fenn's Old Hall possible moated site	Non-Designated Heritage Asset	37183	Moat	Medieval	350546	339658	Possible moat within the yard of Fenn's Old Hall Farm.
10	Fenn's Bank railway station, covered exchange siding	Non-Designated Heritage Asset	37194	Railway Siding	Post-Medieval	351000	339100	A covered exchange siding where peat brought by the Long Mile tramroad was stored before being exchanged to the railway.
11	Fenn's Old Hall farm building	Non-Designated Heritage Asset	55252	Farm Building	Post-Medieval	350530	339586	A farm building depicted on 1st edition (1889) OS maps. Building is not depicted on the OS 1:25,000 1937-1961 Map, so presumed ruinous or demolished between 1915 (when it was last depicted) and 1937.
12	Maelor Saesneg ponds 1341, 1346, 1347, 1355, 1356, 1357, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1531, 1532, 1533, 1534, & 2225	Non-Designated Heritage Asset	62358, 62363, 62364, 62372, 62373, 62374, 62375, 62523, 62524, 62525, 62526, 62527, 62528, 62529, 62530, 62531, 62532, 62533,	Pond	Post-Medieval	349639	339446	Ponds recorded by Maelor Saesneg Historic Landscape Characterisation Project (CPAT 761). Probably former marl pits.

Asset/ Event Number	Asset/Event Name	Status	Cadw/HER Reference	Type of Asset/Event	Period	Easting	Northing	Description
			62534, 62535, 62548, 62549, 62550, 62551, & 63242					
13	Fenn's Moss rifle range	Non-Designated Heritage Asset	87307 & 87308	Firing Range	Modern	350180	338190	A Large First World War rifle range, comprising of four separate ranges (see PRNs 141812-5), that lies immediately south of the railway in the north-east corner of the moss that was in operation by 1st September 1915. (PRN 87307 is replaced by PRN 87308)
14	Fenn's Bank sand pit II	Non-Designated Heritage Asset	92809	Sand Pit	Post-Medieval	350869	338985	Shown on the OS 6-inch Flintshire XXVI NE Map (Published 1900).
15	Fenn's Hall old dugout canoes	Non-Designated Heritage Asset	101302	Boat	Prehistoric	350600	339700	M H Lee in 1879 reported that three or four dugout canoes were found near the old Fenn's Hall and were being used as pig troughs.
16	Fenns's Bank brick and tile works	Non-Designated Heritage Asset	104457	Brickworks	Post-Medieval	350600	338700	A 14 chamber circular Hoffman kiln was built in 1860, (one of the earliest in the country) with a 175 foot high chimney. It was closed in 1936 and demolished in 1962. The old Brickworks site is now occupied by a modern aluminium works.
17	Fenn's Hall Brickworks	Non-Designated Heritage Asset	104462	Brickworks	Post-Medieval	350469	339684	There is no trace of the brick kiln or bricks remaining and a modern cottage now sits on former brickworks.

Asset/ Event Number	Asset/Event Name	Status	Cadw/HER Reference	Type of Asset/Event	Period	Easting	Northing	Description
18	Fenn's Bank railway station, Brick Works siding	Non-Designated Heritage Asset	119829	Railway Siding	Post-Medieval	350791	338932	A siding at Fenns Bank station on the Oswestry, Ellesmere & Whitchurch Railway.
19	Fenn's Bank railway station, 1916 siding	Non-Designated Heritage Asset	119830	Railway Siding	Modern	351000	339100	A siding constructed in 1916 at Fenn's Bank station on the Oswestry, Ellesmere & Whitchurch Railway to accommodate troop trains bringing soldiers to use the firing ranges on Fenn's Moss (see PRN 87308)
20	Fenn's Bank railway station, signal box	Non-Designated Heritage Asset	119831	Signal Box	Post-Medieval	351020	339160	A signal box on the Oswestry, Ellesmere and Whitchurch Railway. Probably built in the 1880s and extended in 1921.
21	Bronington, Conery Lane, Conery Farm, stables	Non-Designated Heritage Asset	124895	Stable	Post-Medieval	349893	338752	A post-medieval brick stable at Conery Farm, south-east of Bronington. Marked on the Ordnance Survey first edition 25 inch to the mile map of 1893. It was photographed in 2016 before being converted for residential use.
22	Fenn's Bank, army camp	Non-Designated Heritage Asset	132159	Army Camp	Modern	350990	339300	By the 1st July 1916 a new camp had been established at Fenn's Bank for troops training on the North-East Fenns rifle ranges (87308), with a capacity for 1000 men under canvas.
23	Fenn's Moss rifle range II, north-west 600 yards range	Non-Designated Heritage Asset	141812	Firing Range	Modern	350090	338168	First World War rifle range, Fenn's Moss, 600 yards, comprising range indicators and target butts. North-westernmost of four ranges, depicted on a plan reproduced in

Asset/ Event Number	Asset/Event Name	Status	Cadw/HER Reference	Type of Asset/Event	Period	Easting	Northing	Description
								Wings Across the Border (See also 87307)
24	Fenn's Old Hall Farm	Non-Designated Heritage Asset	146587, 146588, 146589, 146590, 146591, 146592, 146593, 146594, 146595, 146596, 146597, 146598, 146599, 146600, & 192204	Farm Complex	Post-Medieval	350586	339589	A number of potential Traditional Farm Buildings noted on Ordnance Survey 2nd Edition 25 inch map as part of the CPAT survey.
25	Fenn's Wood Farm	Non-Designated Heritage Asset	146601, 146602, 146603, & 192185	Farm Complex	Post-Medieval	350760	338527	A number of potential Traditional Farm Buildings noted on Ordnance Survey 2nd Edition 25 inch map as part of the CPAT survey.
26	Pinfold Farm	Non-Designated Heritage Asset	147984, 147985, & 192205	Farm Complex	Post-Medieval	350253	340107	A number of potential Traditional Farm Buildings noted on Ordnance Survey 2nd Edition 25 inch map as part of the CPAT survey.
27	The Conery Farm	Non-Designated Heritage Asset	148394, 148395, 148396, 148397 & 192186	Farm Complex	Post-Medieval	349894	338743	A number of potential Traditional Farm Buildings noted on Ordnance Survey 2nd Edition 25 inch map as part of the CPAT survey.

Asset/ Event Number	Asset/Event Name	Status	Cadw/HER Reference	Type of Asset/Event	Period	Easting	Northing	Description
28	Lower Blackoe Farm	Non-Designated Heritage Asset	MSA28895	Farm Complex	Post-Medieval	351656	339139	A farmstead first identified and classified by the Historic Farmsteads Characterisation Project, 2008 – 2010, (ESA6427), largely from the digital version of the c.1900 OS large scale mapping.
29	No 38 Old Man's Bridge	Non-Designated Heritage Asset	MSA37331	Canal Bridge	Post-Medieval	351336	339592	An accommodation bridge on the Llangollen Canal
30	No 39 former Cambrian Rail bridge	Non-Designated Heritage Asset	MSA37333	Rail Bridge	Post-Medieval	351322	339324	The former rail bridge on the Cambrian railway
31	No 40 Blackoe Bridge	Non-Designated Heritage Asset	MSA37334	Canal Bridge	Post-Medieval	351450	339100	A road bridge over the Llangollen Canal.
32	No 41 Springhill Bridge, Llangollen Canal	Non-Designated Heritage Asset	MSA37335	Canal Bridge	Post-Medieval	351479	338546	An accommodation bridge over the Llangollen Canal.
33	Ellesmere Canal	Non-Designated Heritage Asset	MSA2207	Canal	Post-Medieval	341671	333733	The construction of the Ellesmere canal began in 1794 and was completed in the early 19th century. A 1.43km length of the Ellesmere Canal and associated features at Chirk Bank is a Scheduled Monument
34	Oswestry, Ellesmere & Whitchurch Railway (Cambrian)	Non-Designated Heritage Asset	MSA12992	Railway	Post-Medieval	350652	33864	The Oswestry, Ellesmere & Whitchurch Railway was authorised in 1861 to construct a line linking the lines of mid Wales with the LNWR system at Whitchurch. Work started in 1862, and the line opened from Whitchurch to Ellesmere in

Asset/ Event Number	Asset/Event Name	Status	Cadw/HER Reference	Type of Asset/Event	Period	Easting	Northing	Description
								1863 and to Oswestry in 1864. It closed in 1965
35	Bronington, Conery Lane, Conery Farm, stables, photographic survey 2016	Event	124894	Photographic Survey	n/a	349893	338752	A photographic survey of the stables at The Conery near Bronington undertaken by JW Design Services on behalf of the owner before they were converted for residential use.
36	Heritage impact assessment for Lower Blackoe Farm, Alkington, Whitchurch	Event	ESA10148	HIA	n/a	351655	339135	Heritage impact assessment in 2022 for Lower Blackoe Farm, Alkington, Whitchurch by Richard K Morriss.

Asset/ Event Number	Asset/Event Name	Status	Cadw/HER Reference	Type of Asset/Event	Period	Easting	Northing	Description
37	Various Assessment Projects	Event	See description	See description	n/a	-	-	Various assessments covering a range of topics have been carried out across the full extent of Powys and north Wales, including: • Tir Gofal HE1 assessment, 2000 to 2004 (51082; 51487; 51580; 51617; 51739; 51845) • Tir Gofal HE2 assessment, 2000 to 2003 (57023; 57075; 57087) • Montgomeryshire Historic Settlements, 1992 (35976; 58834; 58835) • The Short Dykes of Mid and North East Wales, 2001 to 2006 (58872; 113236; 115411; 123689; 123690) • The Round Huts of Central Powys, 1999 (72315) • Roman Settlements, Funerary and Religious Sites, and Military Sites, 2004 to 2008 (112375; 112376; 115409; 115435; 115452; 115445; 132142) • Defended Enclosures in Montgomeryshire, 2008 (113117; 115397; 115422; 119903; 119904) • Rivers Project, 2021 to 2022 (170065) • Prehistoric Funerary and Ritual Monuments, 2003 to 2004 and 2013 (113240; 113241; 130760; 220232) • Deserted Rural Settlements, 2001 (49993; 113149) • Early Prehistoric Settlement in Mid

Asset/ Event Number	Asset/Event Name	Status	Cadw/HER Reference	Type of Asset/Event	Period	Easting	Northing	Description
								and North-East Wales, 2002 (113237) • Round Huts in North-East Wales 2003 to 2004 (113242; 113243; 121745; 121746) • Early Medieval Cemeteries in Mid and North-East Wales, 2010 to 2011 (113249; 113250) • Uplands Initiative Monograph, 2001 and 2009 (113148; 123167) • Welsh Caves, 2009 (113485) • Welsh Battlefields, 2009 (113549) • Mines and Quarries of Wales, 2010 (115395) • Burnt Mounds in Wales, 2010 (115396) • Early Medieval, Medieval, and Post-Medieval Monastic and Ecclesiastical Sites in Mid and North-East Wales, 2002 to 2004 and 2010 to 2011 (115430; 115432; 123175; 123707) • Medieval Crosses and Crossheads, 2010 (115447) • Archaeological Research Agenda for Wales, 2002 (115434) • Medieval and Post-Medieval Industry, 2011 to 2012 (123124; 141996) • Historic Settlement Archaeology Reassessment, 2010 to 2014 (123561; 123562) • Farms and Farming, 2012 to 2013

Asset/ Event Number	Asset/Event Name	Status	Cadw/HER Reference	Type of Asset/Event	Period	Easting	Northing	Description
								(129654; 129655; 129656) • Mills and Milling, 2011 to 2012 (129723; 129724; 129725) • First World War Commemoration, Camps and Training Areas, 2013 to 2015 (130971; 130972; 132148; 141794) • Military Aircraft Crash Sites, 2013 to 2014 (132130; 132131; 132132) • Rabbit Warrens, 2013 to 2014 (132421; 132422; 132423) • Parks Scheduling Enhancement Programme, 2014 (132470; 132471; 132472) • West Montgomeryshire Scheduling Enhancement Project, 2008 (142095) • The Llys and the Maerdref in East and North-East Wales, 2014 to 2015 (141540; 142249) • The Monastic Granges of East Wales, 2014 to 2015 (142322; 142323) • Montgomeryshire Residual Moorlands Upland Survey, 2014 (164398) • Caersws Llanbrynmair Assessment Project, 1987 (35957) • Coed y Gororau Woodland Assessment Project, 2003 (106542)

Appendix 2. Assessment Scope and Criteria

Scope of the Assessment

This report details the results of a Heritage Impact Assessment and aims to identify and map the nature of the heritage resource within the site and surrounding Study Area. Where possible, the assessment will evaluate the likely impact from the Proposed Development upon the known and potential heritage resources.

This report will include recommendations for mitigation measures and/or further archaeological works; where the archaeological potential of the site warrants, or where additional information on the site is required.

Further works could include additional research, monitoring of geotechnical investigations, programmes of archaeological surveying and/or field evaluation. The results of any further studies can be used to inform the nature of any subsequent mitigation measures (if required) and provide advice upon the scope and design of the Proposed Development.

The assessment has used the sources listed in the main text to identify and map heritage assets and other relevant find spots or evidence within the site and defined Study Area. Heritage assets are defined in national planning guidance and can include designated assets (Scheduled Monuments, Listed Buildings etc.), standing, buried or submerged remains, historic buildings and structures, parks and gardens and areas, sites and landscapes - whether designated or not.

Assessment Criteria

Consideration of archaeological potential will be informed by the number, density and distribution of known heritage assets of a specific period and/or type within the Study Area. The proximity of such assets to the Site and/or the similarities/dissimilarities in topographical location between the Site and the location of known assets will also be a factor in determining potential. Previous land use on the Site will also be a consideration in assessing potential, as later disturbance may have removed or damaged earlier buried archaeological remains and therefore may have reduced the potential for archaeological remains to survive on Site. Consideration will also be given to evidence from landform change in the Study Area and the possibility that natural deposits such as colluvium or alluvium may have buried archaeological remains. The potential for surviving archaeological evidence of past activity within the Site is expressed in the report as ranging between the scales of:

- High – The available evidence suggests a high likelihood for past activity within the site and a strong potential for archaeological evidence to survive intact or reasonably intact;
- Medium – The available evidence suggests a reasonable likelihood for past activity within the site and consequently there is a potential that archaeological evidence could survive.

- Low – The available evidence suggests archaeological evidence of activity is unlikely to survive within the site, although some minor land-use may have occurred.
- Uncertain - Insufficient information to assess.

Buried archaeological evidence is, by its very nature, an unknown quantity which can never be 100% identified during a desk-based assessment. The assessed potential is based on available evidence but the physical nature and extent of any archaeological resource surviving within the site cannot be confirmed without detailed information on the below ground deposits or results of on-site fieldwork.

Where known heritage assets are identified, the importance of such assets is determined by reference to existing designations where available. For assets where no designation has been assigned, an informed assessment has been made of the likely historic, artistic, or archaeological importance of that resource based on professional knowledge and judgement.

Adjustments to the classification (Table 1, below) are occasionally made, where appropriate; for some types of finds or assets where there is no consistent value, and the importance may vary. Levels of importance for any such areas are generally assigned on an individual basis, based on professional judgement and advice.

Table 1: Assessing the Importance of a Heritage Assets

LEVEL OF IMPORTANCE	DEFINITION
VERY HIGH	World Heritage Sites and other designated or non-designated assets with demonstrable Outstanding Universal Value.
HIGH	Assets of high importance and rarity and those considered to be important at a national level., e.g. Scheduled Monuments (or non-designated assets of schedulable quality and importance), Grade I and II* Listed Buildings, and Grade I and II* Registered Historic Parks and Garden. Well preserved historic landscapes, whether inscribed or not, with exceptional coherence, time depth, or other critical factor(s).
MEDIUM	Assets of medium importance and rarity and those considered to be important at a regional level. Designated or non-designated assets including Grade II Listed Buildings and Conservation Areas, well preserved structures or buildings of historical significance, historic landscapes or assets of a reasonably defined extent and significance, or reasonable evidence of occupation/settlement, ritual, industrial activity etc. Examples may include burial sites, deserted medieval villages, Roman roads, and dense scatters of finds.
LOW	Assets of low importance and rarity and those considered to be important at a local level. Locally listed buildings or non-designated assets with some evidence of human activity which have the potential to contribute to local research objectives, structures or buildings of potential historical merit. Examples include assets such as historic field systems and boundaries, agricultural features such as ridge and furrow, etc.
NEGLIGIBLE	Assets of very low importance which are common. Heritage assets with very little or

LEVEL OF IMPORTANCE	DEFINITION
	no surviving archaeological interest or buildings and landscapes of no historical significance. Examples include destroyed antiquities, buildings of no architectural merit, or relatively modern landscape features such as quarries, field boundaries, drains and ponds etc.
UNKNOWN	Insufficient information exists to assess the importance of a feature (e.g. unidentified features on aerial photographs).

The likely magnitude of the impact of the Proposed Development works is determined by identifying the level of change from the Proposed Development upon the 'baseline' conditions of the Site and the heritage resource identified in the assessment. This effect can be either adverse (negative), beneficial (positive) or neutral. The criteria for assessing the magnitude of impact are set out in Table 2 below.

Table 2: Criteria for Determining Magnitude of Impact

LEVEL OF MAGNITUDE	DEFINITION
ADVERSE	
HIGH	Considerable impacts fundamentally changing the baseline condition of the receptor, leading to total or considerable alteration of the asset or its setting – e.g. complete or almost complete destruction of the archaeological resource; dramatic visual intrusion into the setting of the asset resulting in considerable adverse change; significant increase in noise or changes in sound quality; extensive changes to use. Considerable impacts to or loss of designated heritage assets of the highest significance, notably Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, Listed Buildings, Registered Parks and Gardens, and World Heritage Sites.
MEDIUM	Impacts changing the baseline condition of the receptor materially but not entirely, leading to partial alteration of the asset or its setting – e.g. a large proportion of the archaeological resource damaged or destroyed; visual intrusion into key aspects of the setting of the asset; and changes in noise levels or use of an asset that would result in detrimental changes to character.
LOW	Detectable impacts which alter the baseline condition of the receptor to a small degree – e.g. a small proportion of the surviving archaeological resource is damaged or destroyed; minor severance, change to the setting or structure or increase in noise; and limited encroachment into character of a historic landscape.
NEGLIGIBLE	Barely distinguishable adverse change from baseline conditions, where there would be very little appreciable impact on a known asset, possibly because of distance from the development, method of construction or landscape or ecological planting, which are thought to have no long-term effect on the significance of the asset.
NEUTRAL	
NEUTRAL	A change to the asset or its setting which does not result in harm or benefit. This may occur where there is a perceptible change, but that change does not diminish or enhance the significance of the asset or the ability to appreciate its significance.

LEVEL OF MAGNITUDE	DEFINITION
BENEFICIAL	
NEGLIGIBLE	Barely distinguishable beneficial change from baseline conditions, where there would be very little appreciable impact on a known asset and little long-term effect on the significance of the asset.
LOW	Minimal enhancement to an asset or its setting, such as removal of minor inappropriate features, limited improvements to setting or reduction in severance; slight changes in noise or sound quality; minor changes to use; resulting in a small improvement which would lead to enhancement of the ability to appreciate the significance of an asset.
MEDIUM	Changes to key to an asset or its setting resulting in material enhancements which allow for greater appreciation of the asset and/or its setting. For example, removal of an inappropriate later addition allowing for the assets significance to be reveal; removal of an inappropriate feature in an asset's setting allowing the contribution of setting to the assets significance to be better understood or substantial reductions in noise or disturbance such that the significance of known asset would be enhanced.
HIGH	Substantial positive changes to an asset and key elements of its setting which would greatly enhance its significance and the ability to appreciate that significance; this might result from the removal of adverse or considerably distracting features from the setting of an asset; significant decrease in noise or changes in sound quality; changes to use or access.

In certain cases, it is not possible to confirm the magnitude of impact upon a heritage resource, especially where anticipated buried deposits exist. In such circumstances a professional judgement as to the scale of such impacts is applied.

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