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Planning Services
Wrexham County Borough Council

By Email

Eich cyfeirnod Your reference	P/2026/0018
Ein cyfeirnod Our reference	
Dyddiad Date	2 April 2026
Llinell uniongyrchol Direct line	0300 0257894
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Dear Sir/Madam

Planning application for a change of use of land for use as electric bike track (increase in meets from 14 to 30) and creation of car park on 'and northeast of Brymbo Road, Brymbo.

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 consider that the application is inadequately documented and we recommend that additional information is required to enable a balanced decision to be taken against Planning Policy Wales, Technical Advice Note 24 Historic Environment and associated guidance. Full details of the additional information that is required are explained in the below assessment.

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

Assessment

DE203 Penrhos Engine House

The application area includes part of scheduled monument DE203 Penrhos Engine House and the current use of the track has caused damage to the designated historic asset without scheduled monument consent being granted for the activity.

An application for scheduled monument consent must submitted for the track. As the proposed development has a direct impact on an archaeological site of National Importance it would be premature for the local planning authority to determine the planning application as section 6.1.24, of Planning Policy Wales (December 2024) states that "*it will only be in exceptional circumstances that planning consent will be granted if*

development would result in a direct adverse impact on a scheduled monument" and this should be determined by the scheduled monument consent process.

Yours sincerely

Nick Segust
Case Officer
Historic Environment Inspectorate

Cadw

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 (TAN) 24: the historic environment | GOV.WALES 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.