Supporting Planning Statement

Planning application for the installation of 2no. column-mounted CCTV cameras at Pontcysyllte Aqueduct, Trevor Basin, New Road, Wrexham LL20 7TT

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1.0 Introduction

1.1 This supporting statement has been prepared by the Canal & River Trust (the Trust) to accompany a planning application for the installation of 2no. column-mounted CCTV cameras at Pontcysyllte Aqueduct at Trevor Basin in Wrexham.

1.2 This statement addresses relevant planning matters including the reasons why planning permission should be granted. The statement is structured under the following headings as described below:

Introduction. Sets out the purpose of the statement, some background context and the full list of plans and documents.

Application Documents. Outlines the purpose of technical documents that accompany the planning application.

Site Description. Sets out a detailed description of land and physical features within the planning application site.

The Proposed Development. Sets out a detailed description of the works that make up the proposed development.

Relevant Planning History. Sets out the details of relevant planning history recently granted by Wrexham County Borough Council (WCBC) in relation to various developments at Trevor Basin.

Relevant Planning Policy Context. Identifies the 'statutory development plan' for WCBC, establishes land use designations within the application site and on neighbouring land, sets out a comprehensive list of local planning policies relevant to the proposed development, relevant supplementary planning documents and relevant parts of Planning Policy Wales.

Planning Analysis. Provides an analysis of compliance with the relevant planning policy and other material considerations of relevance to a decision on the planning application.

Conclusion. Provides a robust summary of the main points raised and justification of the proposed development.

1.3 In addition to the Planning Statement, the planning application includes the following documents, plans drawings.

Documents

- Completed application form and signed certificates
- Heritage Impact Statement
- Habitat Regulations Assessment 'Phase 1 Screening'

Plans

- Location Plan P12223-CRT-LA-056-027-L001
- Proposed Site Plan (north) P12223-CRT-LA-056-027-L003
- Proposed site plan (south) P12223-CRT-LA-056-027-L-002
- CCTV Elevation P12223-CRT-LA-056-027-L-004

2.0 Application Documents

2.1 A description of each the application documents is set out below.

Planning Statement: addresses the relevant planning matters and relevant planning policy context, including an assessment to demonstrate that planning permission should be granted.

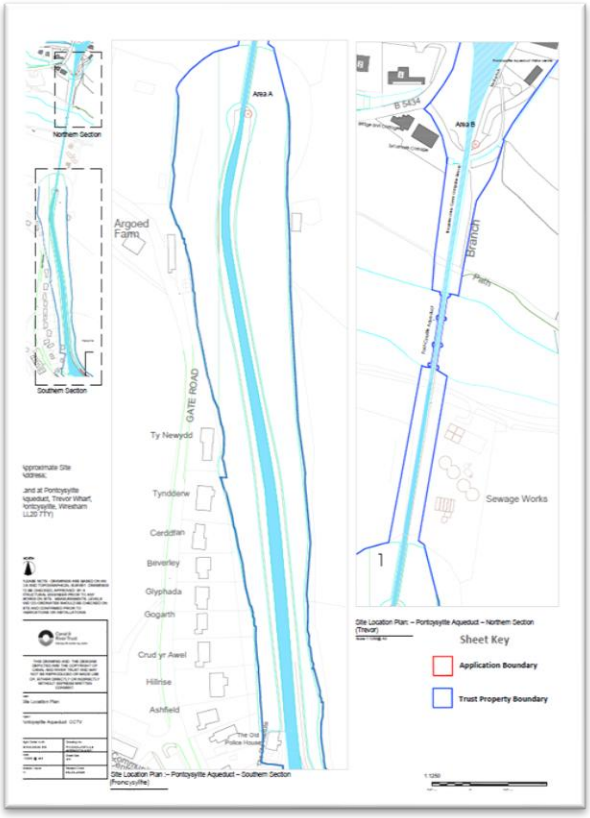
Heritage Impact Statement: provides an assessment of the significance of and impact upon any identified heritage assets as a result of the proposed development.

Habitat Regulations Assessment 'screening': provides an assessment to consider and conclude upon whether the proposed development has a likely significant effect on any European/Ramsar site either alone or in combination with any other project.

3.0 Site Description

3.1 The application site ('the site') consists of two small areas of land, situated at both the northern and southern end of the Pontcysyllte Aqueduct. The Aqueduct is part of the Trust's Trevor Basin site located off the B5434 Station Road in Trevor, Wrexham.

3.2 The image below illustrates the extent of the site in two separate parts, which is edged in red with the remaining Trust landownership edged in blue.



3.3 Both of the two individual site areas consist of a maintained tow path surface adjacent to existing knee rail fencing and the hard surface of the Llangollen Canal towpath at each end of the Aqueduct structure at the respective northern and southern access points.

3.5 In a wider context the site is located within the Pontcysyllte Aqueduct and Canal World Heritage Site, also partly within and partly on the very edge of the designated Conservation Area.

3.6 In 2009 the Pontcysyllte Aqueduct, Trevor Basin and eleven miles of the Llangollen Canal between Chirk and Horseshoe Falls were inscribed as a World Heritage Site (WHS). The WHS recognises the worldwide importance of the landscape character and heritage value of the canal, basin, and aqueduct.

3.7 Trevor Basin and the Pontcysyllte Aqueduct are a popular tourist destination. There are high visitor numbers to this location for tourism, leisure, and recreational purposes. Water based activities and use of the adjacent towpath and surrounding land are very popular.

4.0 The Proposed Development

4.1 The proposed development is for the installation of 2no. RAL 7106 anthracite grey CCTV cameras mounted on 5-metre-high columns. An indicative image of the CCTV camera, its fixing and the solar panel is set out below.



4.2 One pole mounted CCTV camera will be located at each end of the Pontcysyllte Aqueduct. The indicative image below illustrates the approximate location of a proposed pole mounted CCTV camera at the northern end of aqueduct, which is highlighted with the red star.



4.3 The indicative image below illustrates the approximate location of a proposed pole mounted CCTV camera at the northern end of aqueduct, which is highlighted with a red star.



4.4 The purpose of the proposed CCTV cameras is to improve visitor safety at Trevor Basin and the Pontcysyllte Aqueduct and reduce antisocial behaviour.

5.0 Relevant Planning History

5.1 A search of the WCBC online planning history database and the Trust's own planning history database has identified the following relevant planning history.

5.2 In 2022, the Trust secured planning permission for a new small-scale development at Trevor Basin to facilitate relocating the existing boat hire business premises within the site.

- **P/2021/0560:** *Redevelopment of canal basin for use as boat hire business including erection of 2 buildings and storage enclosure* at Trevor Basin, New Road, Trevor. Granted by WCBC on 06/07/2022.

5.3 In 2024, the Trust secured a Certificate of Lawful Use of Proposed Development for a replacement of the existing footbridge within Trevor Basin.

- **P/2023/0812:** *Lawful development certificate for proposed construction of lift bridge* on land south of Scotch Hall Bridge, Trevor. Granted by WCBC on 28/02/2024.

5.4 In 2025, the Trust secured planning permission to construct a new improved pedestrian access route from Trevor Basin to the lower part of the Pontcysyllte Aqueduct.

- **P/2024/1180:** *Improvements to public footpath below Pontcysyllte Aqueduct including realigned footpath, new steps and landings, new railings and handrails and landscaping* on land below Pontcysyllte Aqueduct. Granted by WCBC on 13/03/2025.

5.5 In 2025, the Trust secured planning permission for the erection of a new Education Centre building within Trevor Basin to replace an existing storage structure.

- **P/2025/0538:** *Erection of replacement building* at Trevor Basin, New Road, Trevor. Granted by WCBC on 28/08/2025.

5.6 In 2026, the Trust secured planning permission for the change of use of land for car parking to be used in association with the P/2021/0560 planning consent above.

- **P/2025/0643:** *Change of use land to car park* at Trevor Basin, New Road, Trevor. Granted 20/02/2026.

6.0 Relevant Planning Policy Context

Local Planning Policy

6.1 The Statutory Development Plan is made up of planning policies in the Wrexham Unitary Development Plan (UDP).

6.2 The site is shown on the UDP Proposals Map to include the following designations:

- Green Barrier
- Pontcysyllte Aqueduct and Canal World Heritage Site boundary
- Conservation Area

6.3 Furthermore, the site is also located close to the River Dee Site of Special Scientific Interest (SSSI) and within the buffer zone of the River Dee Special Area of Conservation (SAC), which is recognised on the UDP Proposals Map with a 'Biodiversity Conservation' designation.

6.4 Relevant planning policies from the UDP, which relate to the proposed development and development on sites within the above designations are set out below:

<u>Part 1: The Strategy policies</u>

- Policy PS2: No detrimental effect

<u>Part 2: Specific Policies</u>

- Policy GDP1: Development objectives
- Policy EC7:
- Policy EC6: Biodiversity Conservation
- Policy CF7: Informal Recreation

6.5 In addition, there are also a series of Local Planning Guidance Notes to be read in association with local planning policies from the WCBC Development Plan. The Local Planning Guidance Notes relevant to the proposed development in this location are:

- Local Planning Guidance Note 4: Conservation Areas
- Local Planning Guidance Note 33: Pontcysyllte Aqueduct & Canal World Heritage Site
- Local Planning Guidance Note 32: Biodiversity and Development

National Planning Policy

6.6 National planning policy is currently provided by the Welsh Government in Planning Policy Wales, Edition 12 (PPW).

6.7 National policies relevant to the proposed development in this location are set out in the PPW in:

- Paragraph 6.1.7. Conserving and Enhancing the Historic Environment
- Paragraph 6.1.22. World Heritage Sites
- Paragraphs 6.4.24 & 6.4.39. Biodiversity and Ecological Networks

7.0 Engagement

7.1 In accordance with best practice and the recommendations of *Managing Change in Scheduled Monuments* (2018) and Section 4 of *Planning Policy Wales Technical Advice Note 24,* Glandŵr Cymru sought pre-application advice from Cadw throughout the development of the designs for the column-mounted CCTV installations.

7.2 An initial meeting between Glandŵr Cymru and Cadw was held on site on 7th November 2025 to discuss the potential locations for the CCTV installation, in light of the Heritage Impact Assessment produced by Donlad Insall Associates. The general principles for location were agreed, with Cadw agreeing that Glandŵr Cymru could proceed with an application for the installation of the column-mounted CCTV, (part of Option 5 within the Heritage Impact Assessment) subject to further detail being submitted prior to any application for scheduled monument consent being made.

7.3 A telephone conversation with the Cadw Inspector on 11th February 2026 reiterated Glandŵr Cymru's intention to submit an application for scheduled monument consent, but that detailed proposals had yet to be finalised. The Cadw Inspector stated that they had discussed the principles of the proposed interventions with colleagues and that all were generally supportive of the proposal, subject to the detailed design.

7.4 Having developed the final design for the CCTV arrangement, Glandŵr Cymru shared the designs with the Cadw Inspector by email on 8th April 2026, who responded in an email of the same date that they found the proposals acceptable and, although the column-mounted CCTV installations could be deemed to have a detrimental visual impact on the setting of the designated assets, the public benefits of the proposal were considered to outweigh the impacts upon that setting.

8.0 Planning Analysis

8.1 Having regard to the proposed development, its location and the relevant planning policy context, it is considered that the key matters to address in this application are:

- Location of development
- Enhancing the Pontcysyllte Aqueduct and Canal World Heritage Site
- Heritage
- Visual Amenity
- Ecology

Location of development

8.2 The site is located within a designated Green Barrier but is on the very edge of the Frontcysyllte and Trevor settlement limits. The image below illustrates the location of the site in context with the Green Barrier designation and adjacent settlement limits.



8.3 Within the UDP Part 1 the Council sets out strategic policy PS2, which is relevant to the location and impact of new development. Policy PS2 is set out below.

- ***Policy PS2:*** *Development must not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment.*

8.4 In terms of Policy PS2, the proposed development is small scale and does not involve much by the way of physical intervention, which therefore has minimal visual impact in context with the established character of the area and quality of the natural environment.

Enhancing the Pontcysyllte Aqueduct and Canal World Heritage Site

8.5 The aim of the proposed development is directly linked to the Trust's wider aspirations to help improve the quality of Trevor Basin as a recreational and tourist destination within the World Heritage Site.

8.6 It is considered that UDP Policy CF7 (Informal Recreation) is relevant to the proposed development in this location, in which it recognised that the canal and WHS are valuable local water attractions, which can be enhanced through 'small-scale developments' related to the recreational use of the canal. It is stated in UDP Policy CF7 that:

'The Llangollen Canal, Pontcysyllte Aqueduct and Trevor Wharf are valuable local water recreation attractions that could be enhanced by small-scale developments directly related to the recreational use of the canal'

8.7 It is considered that the proposed pole mounted CCTV cameras represent small-scale development, which is intended for the purpose of improving the overall quality of the site in connection with the recreational use of the canal and therefore compliant with Policy CF7.

Heritage

8.8 The site is located within the Pontcysyllte Aqueduct and Canal World Heritage Site and within the designated conservation area, which are widely recognised for their special historic characteristics. UDP Policy EC7 is relevant to protecting land within conservation areas from harmful development, in which it is stated that:

'Within, and in close proximity to, conservation areas, the priority will be to preserve and/or enhance those buildings, structures, streets, trees, open spaces, archaeological remains, views, and other elements which contribute to the unique character of the area'

8.9 WCBC Local Guidance Note 33 (Pontcysyllte Aqueduct & Canal World Heritage Site) is also relevant in the consideration of planning applications within the World Heritage Site boundary. In paragraph 5.2, it is stated that:

'The following objectives are taken from page 79 of the Pontcysyllte World Heritage Site Management Plan (2007 – 2012):

- *To manage the World Heritage Site and Buffer Zone in a sustainable manner to conserve, enhance and present the Outstanding Universal Value of the site locally and internationally.*
- *To balance the needs of protection, conservation and access, the interests of the local community and the achievement of sustainable growth.*
- *To engage with and deliver benefits to the local communities around the site.*
- *To attract visitors to the area; and*
- *To generate income that adds value to the local economy or is reinvested in the running of the site.'*

8.10 Guidance Note 33, Table 1 (Typical Development Scenarios) sets out typical examples of possible appropriate forms of development and guidance criteria in relation to those developments in the WHS. Table 1 is set out on the following page.

Table 1 – Typical Development Scenarios

Development Scenario	Development Type	Detailed Guidance
1. Any development within the WHS, or immediately adjacent to it.	● Typically small scale ● Householder (residential extensions and conservatories) ● Changes of use ● Minor tourist development (toilets, small parking areas, picnic areas).	● Minor tourist development for essential small scale facilities could be appropriate in the open countryside where the openness of the countryside is maintained. ● Design siting and materials important. ● Statement required to state how the development contributes to the WHS's character.

8.11 Additionally, national planning policies in PPW are also relevant to proposed development in this location. In PPW paragraph 3.38, it is stated that:

'The countryside must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources. However, the need to conserve these attributes should be balanced against the economic, social and recreational needs of local communities and visitors. To achieve this, rural places should foster adaptability and resilience to help maintain vibrancy of communities and availability of services.'

8.12 Also, PPW paragraph 5.5.3 is relevant, in which it is stated that:

'In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy. In addition to more traditional forms of rural tourism, planning authorities should plan positively for active, green and cultural tourism where they are appropriate. Development should be sympathetic in nature and scale to the local environment.'

8.13 The Trust has prepared a Heritage Impact Statement to accompany the application, which has been prepared in accordance with Section 6.1 of *Planning Policy Wales* (Ed. 12, 2024) and paragraph 1.15 of *Technical Advice Note 24* (2017), as well as relevant Cadw guidance.

8.14 The Heritage Impact Statement sets out the historical context of the site including all designated historic assets and the site history, other relevant features. In the concluding paragraphs of the Heritage Impact Statement, the following is established, which is considered suitably demonstrate that the proposed development is compliant with the relevant planning policy context.

'The steady increase in visitor numbers as well as reported incidences of misuse and anti-social behaviour at the Pontcysyllte Aqueduct site has highlighted the need to increase visitor safety measures and monitoring. The proposals detailed in this application, considered by the Heritage Impact Assessment as having the least detrimental impact upon the historic environment, aim to make the site safer for the majority of visitors, with minimal impacts upon the overall significance of the location or any of the constituent heritage assets. Any perceived harm of the proposals is considered to be 'less than substantial' and outweighed by the public benefits of providing improved monitoring the site, allowing visitors to continue to fully appreciate the Outstanding Universal Value placed upon the respective sections of the World Heritage Site.

By installing column-mounted CCTV it is considered likely that there will be a general increase in understanding of the inherent risks posed at the site, and visitor behaviour will be modified as a result. It is believed that CCTV monitoring of the aqueduct will also discourage incidents of misuse and anti-social behaviour. This will have a positive impact on the perception of the wider site, hopefully encouraging better behaviour and increased visitor satisfaction.

Therefore, overall, it is considered that the column-mounted CCTV cameras will bring wider benefits to the site, and the surrounding area, and that the potential impacts of the interventions on the ***high significance*** *of the relative sites will be* ***neutral*** *to* ***low adverse*** *with any perceived harm outweighed by the public benefits. As such, the proposals would appear to accord with both national and local planning policy.'*

Visual Amenity

8.15 The proposed development will have minimal impact in visual terms within the established appearance of the site. The only physical features will be vertical poles and CCTV in this location that would be visually detrimental to the character of the area.

8.16 In terms of visual amenity, it is considered that UDP Policy GDP1 (Development Objectives) is relevant to new development proposals, in which it is stated that, new development should.....

Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality'

8.17 National planning policy in PPW is also relevant to this proposal, in paragraph 3.10 it is stated that:

'In areas recognised for their particular landscape, townscape, cultural or historic character and value it can be appropriate to seek to promote or reinforce local distinctiveness. It is of particular importance that in those areas, the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials (including where possible sustainably produced materials from local sources) is considered.'

8.18 The proposed development will have minimal visual and physical impact. It will not therefore have a detrimental impact upon the character of the area when viewed in context with the wider site, which is considered to comply with the objectives of the relevant local and national planning policies referenced above.

Ecology

8.19 The site is located close to the River Dee 'Site of Special Scientific Interest' (SSSI) and is within the buffer zone of the River Dee 'Special Area of Conservation' (SAC), which are located on land to the south along the river corridor.

Therefore, UDP Policy EC6 (Biodiversity Conservation) is relevant to the proposed development in this location, in which it is stated that:

'Development either within or close to sites of biodiversity interest will only be permitted where it can be clearly demonstrated that the need for the development outweighs the need to safeguard the intrinsic nature conservation value of the site. Where such

development is permitted, damage should be kept to a minimum, and compensatory measures should be provided. Measures to improve the biodiversity value of sites and enhance their natural conservation interest and landscape quality including the establishment of local nature reserves, will be supported.'

8.20 A Stage 1 Habitat Regulations Assessment 'screening' process has been carried out, to establish whether the project is likely to have a significant effect on any European/Ramsar site either alone or in combination with any other project. The Stage 1 Habitat Regulations Assessment is submitted in full with this application. In the summary it is concluded that:

'There are no impact pathways identified as having a risk of a significant adverse effect on the conservation objectives for the FOI, therefore Stage 2: Appropriate Assessment is not required.'

9.0 Conclusion

9.1 The site is located within a designated Green Barrier but is on the very edge of an identified Settlement Limit, in terms of Policy PS2 the proposed development is small scale and does not involve much by the way of physical intervention, which therefore has minimal visual impact in context with the established character of the area and quality of the natural environment.

9.2 Furthermore, it is considered that the proposed column-mounted CCTV cameras represent small-scale development, which is intended for the purpose of improving the overall quality of the site in connection with the recreational use of the canal and therefore compliant with Policy CF7

9.3 The Heritage Impact Statement sets out the historical context of the site including all designated historic assets and the site history, other relevant features. In the concluding paragraphs of the Heritage Impact Statement, it establishes, which is considered suitably demonstrate that the proposed development is compliant with the relevant planning policy context.

9.4 The proposed development will have minimal visual and physical impact. It will not therefore have a detrimental impact upon the character of the area when viewed in context with the wider site, which is considered to comply with the objectives of the relevant local and national planning policies.

9.5 A Stage 1 Habitat Regulations Assessment 'screening' process has been carried out, to establish whether the project is likely to have a significant effect on any European/Ramsar site either alone or in combination with any other project. In the summary it is concluded that there are no impact pathways identified as having a risk of a significant adverse effect on the conservation objectives for the FOI, therefore Stage 2: Appropriate Assessment is not required.

9.6 Having regard to the above analysis, the Trust respectfully requests that the WCBC grants planning permission for the proposed development.