Heritage Impact and Justification Statement

In support of a Planning Consent Application for visitor safety improvements at Pontcysyllte Aqueduct - column-mounted CCTV cameras.

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1.0 Introduction

This Heritage Impact and Justification Statement has been prepared by Peter Chowns, Head of Heritage & Collections and Accredited Conservation Architect, at Glandŵr Cymru/The Canal & River Trust.

This document has been produced in accordance with current Welsh legislative guidance and, in particular, the guidance provided in the following documents; *Heritage Impact Assessment in Wales* (2017) and *Managing Change in World Heritage Sites in Wales* (2017). It is to be read as an integral part of an application for planning permission, submitted by Glandŵr Cymru, in connection with improved visitor safety measures at Pontcysyllte Aqueduct, namely **column-mounted CCTV cameras.**

The application proposals seek to introduce CCTV cameras, mounted on steel poles to provide a means of recording and monitoring thereby reducing misuse and antisocial behaviour. The site is situated within the boundary of the Pontcysyllte Aqueduct and Canal World Heritage Site, inscribed in 2009, and the Pontcysyllte Aqueduct Conservation Area, (formerly the Trevor Basin Conservation Area) designated in 1998, and revised in 2009. The canal itself is designated a scheduled monument, which includes all the material elements of the canal channel including the canal walls, copings, towing path and associated earthworks. The principal canal structures, such as aqueducts and tunnels, are also included, but other associated buildings and over bridges are excluded from the scheduling, as these are covered, where necessary, by individual listings. (fig. 1).

A separate consent application has been made to Cadw, for Scheduled Monument Consent, submitted 20th April 2026.



Fig. 1: Site plan with current area heritage designations. Scheduled Monument shown in orange (Not to Scale)
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The need for safety improvements at Pontcysyllte Aqueduct has been identified as part of Glandŵr Cymru's ongoing management of the key assets within the Pontcysyllte Aqueduct and Canal World Heritage Site, as well as being a direct response to a number of high-profile incidents at the site that have required the Glandŵr Cymru to reevaluate the safety requirements at the site, and on the aqueduct structure in particular.

Since the inscription of the World Heritage Site in 2009, visitor numbers to the site have steadily increased year on year, a trend which the Trust predicts will continue over the next decade. The site has also been subjected to an increased range of anti-social behaviours, including misuse of the aqueduct structure, unauthorised graffiti and physical damage to property.

In response to the need identified above, the Trust has commissioned a number of studies and impact assessments to evaluate the most appropriate and effective course of action to improve safety at the site. The proposed interventions outlined in Section 5 below have been designed to discretely retain the evidential and aesthetic values of the monument, whilst also improving the standard of safety in relation to general public access and use.

This application has been prepared with reference to a comprehensive Heritage Impact Assessment (HIA), prepared by Donald Insall Associates, which provides a broader overview of the significance of the asset, and site, as well as detailed impact assessments of a range of potential safety improvements.

Although the Heritage Impact Assessment (HIA) looked at other aspects of visitor safety at the site, including issues with the aqueduct handrail, the aim of this application is to specifically concentrate on the installation of column-mounted CCTV cameras that do not directly impact on the fabric of the Grade I listed aqueduct, (Option 5 in the HIA) and clearly explain the processes that have been undertaken to assess the impact of the proposals on the significance of the heritage assets and to justify the interventions in relation to any perceived 'harm' that might result from their implementation.

2.0 Site description

Pontcysyllte Aqueduct on the Llangollen Canal is located at Froncysyllte, near the village of Trevor, in north-east Wales. The nearest town is Llangollen, about 3 miles to the east. The site lies within the Wrexham County Borough Council area. The Ordnance Survey grid reference for the site is:- 327045, 342015

There are two proposed development sites, situated at each end of the Pontcysyllte Aqueduct. Each intervention will comprise a free-standing column-mounted CCTV camera that can record use of the aqueduct itself. Both sites are fully owned and operated by Glandŵr Cymru (figs. 2 & 3).

The proposed CCTV installations a will be installed within an area designated as the 'Pontcysyllte Aqueduct' character area within the *Conservation Area Assessment & Management Plan* (2009).

The northern development site currently comprises an open area, laid to mown grass and a metalled towing path, on the approach to the aqueduct from the car park and Visitor Centre (fig 2). The canal lies to the western side, and a timber post and rail fence to the east angles towards the northern end of the aqueduct handrail, forming a wedge shape. The brick-built Visitor Centre and Grade II listed dry dock buildings lie a distance to the north of the site. To the west of the dry dock is the junction to the western section of the canal, (extending to Llangollen and onwards to the River Dee at Horseshoe Falls) the entrance to which is bridged by an unusual composite canal bridge utilising both Cefn Mawr limestone and curved iron beams. It was built to designs by Thomas Telford, allowing a lower, flatter canal arch whilst still providing adequate headroom thereby facilitating shorter approach ramps, and is listed at Grade II.

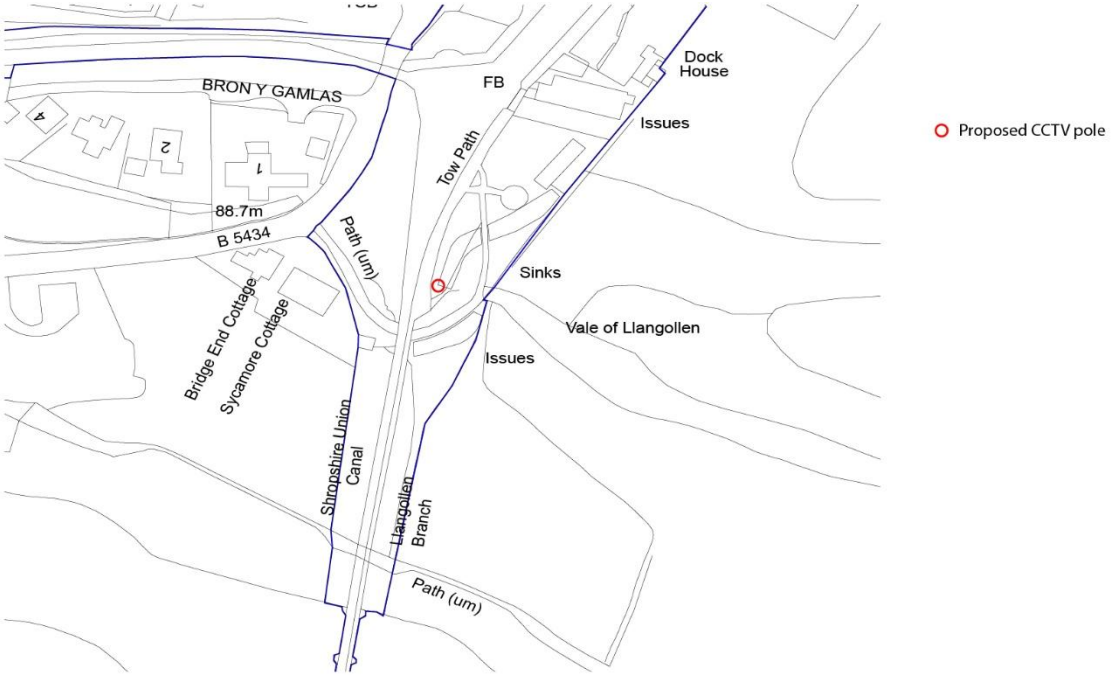


Fig. 2: Plan of Proposed Northern Development Site (Not to Scale)
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The development site to the south of the aqueduct is confined to the eastern towing path that approaches Pontcysyllte Aqueduct from the village of Froncysyllte (fig 3). The canal sits upon a high earth embankment that extends out from the valley side, and creates the initial approach to the aqueduct which then spans the River Dee. The embankment sides are densely wooded, creating a bucolic atmosphere that is, to some extent, at odds with the historic industrial development that led to its creation.

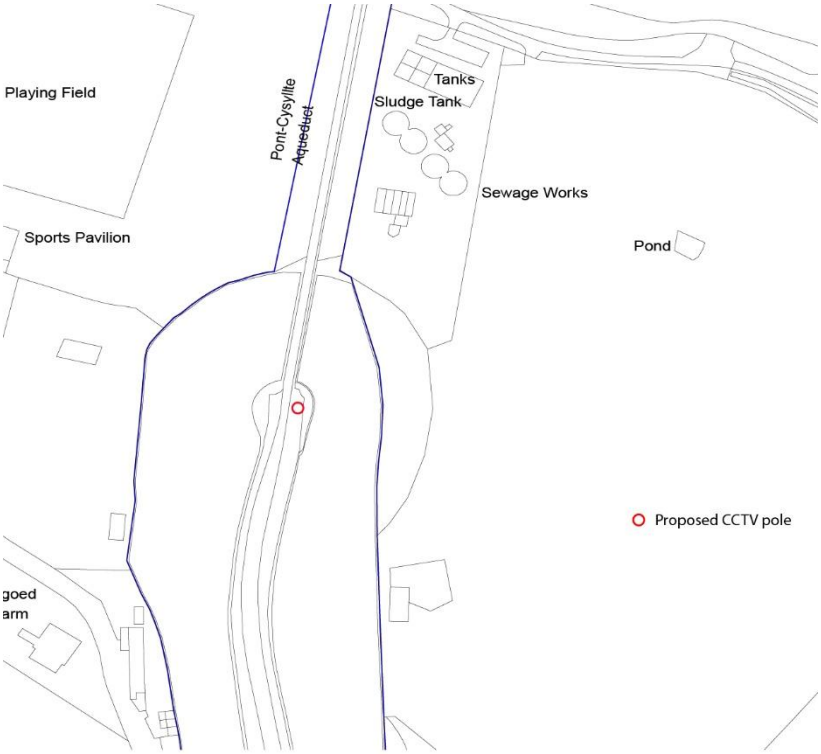


Fig. 3: Plan of Proposed Southern Development Site (Not to Scale)
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3.0 Site History

A great deal has been documented about the historical development of the Ellesmere (now Llangollen) Canal, much of it at the time of the inscription of the canal as a World Heritage Site in 2009 https://whc.unesco.org/uploads/nominations/1303.pdf. It is therefore considered unnecessary to replicate this information in detail within this document, but to offer a relatively brief summary of the development of Pontcysyllte Aqueduct and the associated canal system.

The Ellesmere Canal was originally proposed and authorised through an Act of Parliament in 1793, intended as a means of linking the major river arteries of the Mersey, Dee and Severn and opening them up to the rich slate, coal and iron reserves of the Welsh uplands. Principally engineered by two of the most important canal engineers of the 'heroic age' of civil engineering in the 19th century, (William Jessop and Thomas Telford) the construction of the canal was commenced by the Ellesmere Canal Company in 1795 and was finally completed in 1805 with the opening of the Pontcysyllte Aqueduct and the adjoining trans-shipment wharf at Trevor Basin. However, only part of the original plan was eventually executed, with the stretch from Chester south to Ruabon being abandoned, along with the link south to the River Severn, meaning that the canal now terminated at Trevor Basin, where wharves and a tramway served the local iron and coal industries. Map regression shows the original intended route via Cefn Mawr (here, recorded as Cefn Common) and that the feeder canal to the River Dee, via Llangollen, was not, at this stage, required (fig. 4).



Fig. 4: Extract from 1796 plan showing intended route of the Ellesmere Canal (Extract not to scale). Principal development sites circled in red. Reproduced courtesy Denbighshire Archives

The eastern section of the Ellesmere Canal, from Frankton to Chirk Bank, was constructed fairly rapidly and was completed by 1802. Prior to completion of the Pontcysyllte Aqueduct the canal terminated at Chirk Bank, where a number of wharves serviced the nearby ironworks, collieries and quarries, whilst the next, more challenging, section of canal to Trevor was completed. Whilst the canal route to Chirk Bank might have been recognisable to those who were conversant with earlier 18th century canals in the UK, what followed was a testing ground for ideas that would prove to be ground-breaking and would change engineering practice internationally. It is the monumental scale of the engineering, and the innovative use of materials, most notably cast and wrought iron, in the next section of the canal that make Pontcysyllte Aqueduct and Canal World Heritage Site 'universally outstanding'. At the time of its completion, the length of canal was described as being, '*composed of works more difficult of execution than can perhaps be found anywhere within in an equal distance of canal navigation*' in part due to the desire of its engineers to overcome the difficult terrain of two major river valleys, and the ridge of ground between them, without wishing to follow the topography or create time-consuming and resource-hungry lock flights. The combination of tunnels, with integral towing paths, deep cuttings and high embankments, composite road bridges and the innovative aqueducts at Chirk and Pontcysyllte make

the western section of the Ellesmere Canal unique in the inland waterway network. The canal finally opened to Trevor Basin in 1805.

Only small branch canals from the basin were ever cut, including the 10km Llangollen Branch, which was constructed under a separate Act of 1804 and provided a much-needed water supply from the River Dee west of Llangollen at Horseshoe Falls. Originally, the canal from Gledrid Bridge to Trevor Basin was known as the Ellesmere Canal, and the section west to Horseshoe Falls was its Llangollen Branch, but in the late 20th century both lengths were rebranded the Llangollen Canal.

During 1813 the Ellesmere Canal Company merged with the Chester Canal Company. A further branch was cut in 1830, following the line of the original intended northern route, from the north of Trevor Basin to a terminus near the Queens Road in Cefn Mawr, serving the Plas Kynaston chemical works, Pottery and Iron works. With the connection to the Trent & Mersey Canal realised in 1833, and the construction of the Birmingham and Liverpool Junction Canal in 1835, transport on the canal flourished.

The Ellesmere & Chester and the Birmingham & Liverpool canal companies merged in 1845 to form the Shropshire Union Canal Company and, a year later, the Ellesmere Canal and Llangollen Feeder became part of the Shropshire Union Railways and Canal Company as railway interests in Shropshire sought to out compete and close the canals with a view to utilising their routes for new rail tracks. However, the following year the canals were leased to the London and North Western Railway Company (LNWR) who, rather than closing and developing the canals, developed their waterway interests, especially within the areas of competing rail companies.

By the late 19th century the areas of the proposed development sites of the proposed bridge are largely unchanged from how they are found now, as seen in the first edition Ordnance Survey Map of 1872, published in 1879 (fig. 5). The village of Trevor has yet to really be established, comprising only a small number of properties on the road down to Cysylltau Bridge over the River Dee, and those associated with the canal terminus and transhipment wharves, including the dry dock. At this stage, Froncysyllte embankment to the south of the aqueduct looks to be sparsely populated with trees, which would have reinforced the presence of the man-made structures against the landscape.



Fig. 5: Ordnance Survey Denbighshire 6" to 1 mile Sheet XXXIV.5, surveyed 1872 - 73, published 1879. (Extract not to scale). Reproduced with the permission of the National Library of Scotland

Subsequent Ordnance Survey maps show very little had changed at either site by the turn of the century, although the Froncysyllte embankment appears to be becoming more wooded (fig. 6).

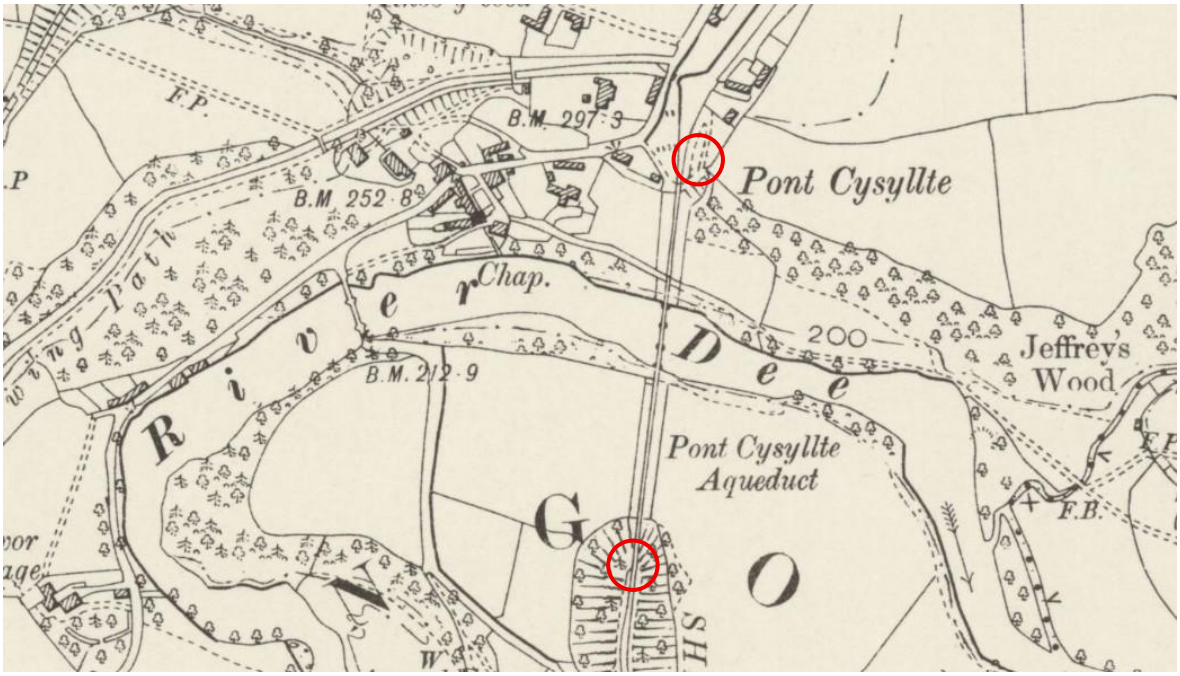


Fig. 6: Ordnance Survey Denbighshire 6" to 1 mile Sheet XXXV.SW, surveyed 1898, published 1900. (Extract not to scale). Reproduced with the permission of the National Library of Scotland

In 1922 the Shropshire Union Railways and Canal Company was fully bought out by LNWR and then, in turn, absorbed by the London Midland and Scottish Railway in 1923. As the rail network expanded and faster transit became possible, the canal network saw a drop in use and a gradual decline in the face of competition from first rail, and then road transport. The Ellesmere Canal remained commercially viable into the early 20th century, although at a much lower level, and a major breach at Llanymynech in 1936, just below Frankton Locks, led to the abandonment of the southern section and the Montgomeryshire Canal. By 1944 the carriage of goods on the Ellesmere canal had all but ceased and the London Midland and Scottish Railway Company gained legal abandonment of all of the Shropshire Union Canal west of Hurleston Junction. However, the canal through Llangollen and Trevor was kept open due to the need to maintain its water supply to the remaining sections of the canal network. The Ordnance Survey of this period still shows little change to the proposed development areas (fig. 7)

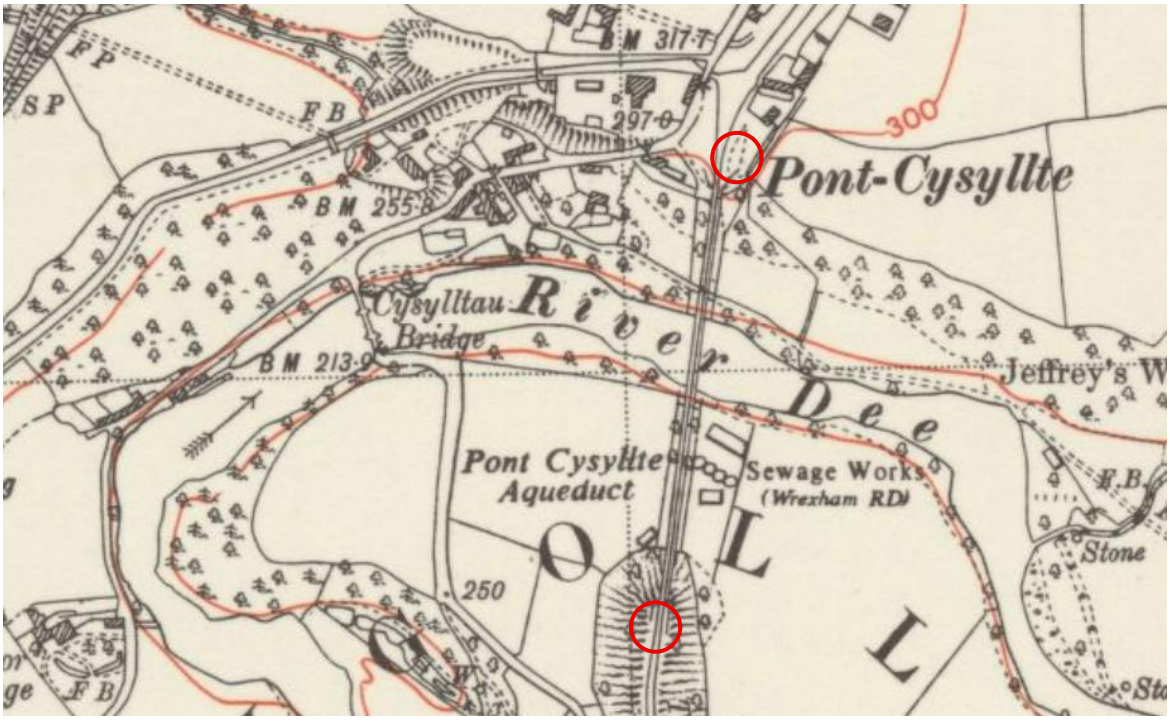


Fig. 7: Ordnance Survey Denbighshire 6" to 1 mile Sheet XXXV.SW, revised 1949, published 1954. (Extract not to scale). Reproduced with the permission of the National Library of Scotland

When the railways were nationalised in 1948 the canals they owned, including the Shropshire Union, were incorporated into the newly formed British Transport Commission. Although the Commission initially focussed on encouraging commercial traffic to use the waterways, continued improvement in road and rail freight infrastructure in the 1950s, and legislation such as the 1956 Clean Air Act, which affected the remaining waterway coal carriers, meant that their efforts were in vain.

Under the 1962 Transport Act, the British Transport Commission was split into several new organisations, with the inland waterways of Britain becoming part of the new British Waterways Board. In the same year, an unusually harsh winter saw the canals frozen solid for thirteen weeks and many boats unable to move for the entire period. This was one of the reasons given for the decision by the British Waterways Board to formally cease most of its commercial narrow boat traffic on the canals. However, the use of the Llangollen Canal as a means of supplying water to the wider canal network, as well as to large areas of Southern Cheshire via Hurleston Reservoir, meant that, unlike some other Welsh canals, it was saved from total closure, but the transportation of goods continued to dwindle across the canal network, to be replaced by a rise in leisure craft.

As the rise in 'pleasure boating' increased in the second half of the 20th century the area became very popular with boaters wishing to cross the Pontcysyllte Aqueduct, and Anglo Welsh Narrowboat Holiday Company set up a base for hire boats at Trevor Basin.

There are surprisingly few historic photographs of the areas of the proposed interventions, with the majority of historic images from the mid 19th century onwards understandably showing wider views of the entire Pontcysyllte Aqueduct, or details of works being undertaken to the cast iron trough. However, there is one image in the Canal & River Trust archive dating from the 1970s that shows the northern end of the aqueduct, and the end of the parapet railing, as well as the lack of any guarding to the edge of the stone revetment. (fig 8).

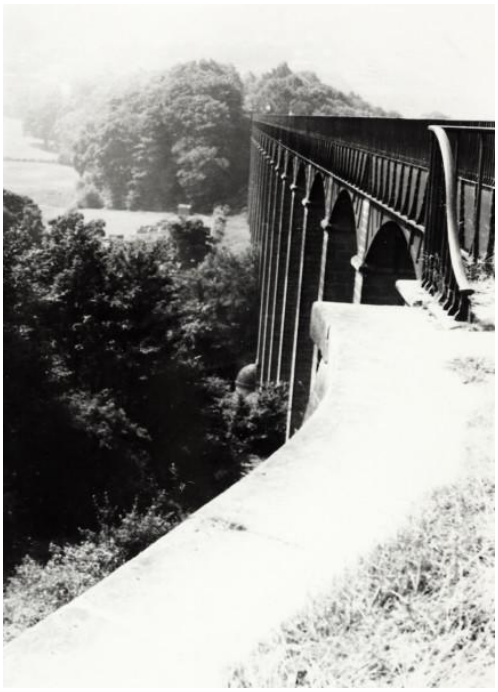


Fig 8: Image of northern end of the aqueduct taken in the 1970s,
© The Waterways Archive Ref:BW192/3/2/5/2/2

In the late 19th century the potential of the site as a tourist destination was recognised, and the area around Trevor Basin underwent improvements in recognition of the potential of the site to attract a wider visitor base. Pontcysyllte Aqueduct and Trevor Basin now have close to 500,000 visits per year, arriving by both canal and road, and many of those visitors will pass over the aqueduct as an integral part of their visit.

4.0 Statement of Significance

This Statement of Significance has been prepared to conform broadly with Cadw's *Heritage Impact Assessments in Wales* (2017) and ICOMOS' *Guidance on Heritage Impact Assessments for Cultural World Heritage properties* (2011).

As shown in fig. 1, both of the proposed locations for the column-mounted CCTV installations are covered by a number of statutory designations making it of local, national and international importance. The sites are situated within the boundary of a designated World Heritage Site, and a canal-focussed conservation area. The southern development site also lies within the boundary of the scheduled monument and although the northern site is not within the scheduled area, the development will have an impact upon the setting of the monument. Although carefully considered so as not to directly impact the fabric of the Grade I listed aqueduct, the development will have an impact upon the setting.

Significance is usefully defined within Annex D of *Planning Policy Wales Technical Advice Note 24: The Historic Environment* (TAN24) as, "*the sum of the cultural and natural heritage values of a place, often set out in a statement of significance*". Setting is further defined as, "*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".*

Due to the nature of the proposed developments, and its likely impacts upon a wide range of designated heritage assets, it will be necessary to have regard to the Cadw *Conservation Principles* (2011) which underline the importance of understanding the significance of a heritage asset, in order to understand the likely impacts development will have. The document states that "*Sustainable management of a site begins by gaining an understanding of its cultural and natural heritage values and then setting out its significance. It is essential then to communicate that significance to everyone concerned with that site, and who may be affected by any actions taken*." It also states that "'*Considered change' offers the potential to enhance historic assets, as well as generating the need to protect their established heritage values. It is the means by which each generation aspires to enrich the historic environment*" and, therefore, well considered and appropriate interventions within the historic environment, which do not have significantly negative impacts upon the understanding, values or special nature of the historic environment should not preclude modern development where it can be justified.

Conservation Principles (2011) goes on to state that, "*every conservation decision should be based on an understanding of its likely impact on the significance of the fabric and other aspects of the site concerned*" and that "*new work must respect the setting and significance of the historic assets affected. The quality of design and execution must add value to that site and its setting, both now and in the future*". Paragraph 30 reinforces this view by stating that, "*the public interest in conserving and sustaining heritage values is not in conflict with the building of new work. Innovative design and construction is important to sustaining cultural values, but should not be achieved at the expense of assets of established value. New work can also support the maintenance and enhancement of other historic assets through the regeneration of an area*".

Paragraph 2.3 gives greater clarity on the understanding of significance by stating that, "*in order to assess the significance of an historic asset, four component values need to be considered. These are:*

Evidential value

Historical value

Aesthetic value

Communal value

These are aligned with those within BS 7913:2013 – Guide to the Conservation of Historic Buildings and are reiterated within paragraph 1.12 of the *Planning Policy Wales Technical Advice Note 24 – The Historic Environment* (2017).

It goes on to state, "*briefly, they can encompass: the physical remains or surviving fabric of an historic asset (evidential); the contribution of documentary sources, pictorial records and museum collections to forming an understanding of an historic asset (evidential); how historic assets through illustrative or*

associative values can connect the past with the present (historical); the way in which people draw sensory and intellectual stimulation from an historic asset through its form, external appearance or setting (aesthetic); the social and economic values, and spiritual meanings, that an historic asset has for the people who relate to it (communal)".

Understanding significance is also a fundamental aspect within Cadw's *Managing Scheduled Monuments in Wales* (2018) and Annex 2 within that document also gives clear advice on the relative values that make up a site's significance.

Clearly, the sites being located within the boundary of the World Heritage Site and a designated Conservation Area, would indicate that the sites are of **considerable heritage significance**. World Heritage Sites are formally designated assets of Outstanding Universal Value, whose importance transcend national boundaries. Significance is defined, to some extent, within the Statement of Outstanding Universal Value written at the time of inscription, (Appendix A) and the tangible and intangible attributes conferred upon it which, in the case of the Pontcysyllte Aqueduct and Canal include:

• ***Form and design*** *– for example … the form of wharves and warehouses at Llangollen and Trevor Basin,*

• ***Materials and substances*** *– use of traditional materials and conservation techniques in recent years.*

• ***Use and function*** *– the continued use of the canal for boating purposes follows a tradition that extends back to the early nineteenth century; the use of the Llangollen arm to the Horseshoe Falls as a water feeder as well as a navigation.*

• ***skills****, for example the canal 'lengthsman'; use of traditional maintenance, repair and conservation techniques which respect the qualities and integrity of original workmanship; continued boating activity on the canal.*

• ***Location and setting*** *– the striking relationship between the canal and the landscape, including the fact that the western half of the Buffer Zone has maintained a rural aspect similar to that of the area when the canal was built.*

Integrity and Authenticity

2.21 ***Integrity*** *is derived from the completeness of the attributes described that demonstrate the OUV. UNESCO has acknowledged that the integrity of this canal has been maintained in the hydraulic and civil-engineering structures that have survived in their original form… The integrity of the landscapes and the Buffer Zone contributes to the overall value of the World Heritage Site.*

2.22 UNESCO concluded at the time of inscription that 'the property has all the elements of integrity necessary for the expression of its value as a major historic canal of the Industrial Revolution'.

2.23 ***Authenticity*** *is derived from the link between the attributes and the Outstanding Universal Value. The buildings associated with the canal and its environment usually achieve a good degree of authenticity…"*

The designation of the canal itself as a scheduled monument only reinforces the significance of the site, and the designation description for the scheduled monument is included in Appendix B.

As demonstrated in Section 3 above, the proposed sites of the column-mounted CCTV installations appear largely unaltered since the completion of the Pontcysyllte Aqueduct in 1805.

As the sites of the proposed interventions have apparently undergone so little alteration since the 1st Edition Ordnance Survey map in 1872, it is considered unlikely that either site will yield further information about the past historic uses. Their evidential value is therefore considered to be **low to moderate**.

The historic value of the sites is attributable to their proximity to the Pontcysyllte Aqueduct, a Grade I listed and scheduled structure of international significance, its late 18th century construction and association with the internationally renowned engineers Thomas Telford and William Jessop, as well as the past use of the area to the north of the aqueduct as a significant and unusual transhipment hub. The historical value of the sites is considered to be **high**.

Whilst the proposed locations of the column-mounted CCTV installations themselves might be considered to offer little in terms of enhancing the environs of the Pontcysyllte Aqueduct or contributing to the Outstanding Universal Value of the World Heritage Site in their 'undeveloped' state, their close proximity to the Grade I listed Pontcysyllte Aqueduct, as well the contribution the sites makes to the wider landscape on the approach to the aqueduct means that they do have a pleasing aesthetic quality, that is largely fortuitous. Any development in either location will have a direct impact on the setting and appreciation of the designated assets and areas, as well as upon the understanding and aesthetic qualities of Trevor Basin itself. The combined aesthetic quality of the sites is therefore considered to be **moderate** to **high**.

The proposed column-mounted CCTV installation at the northern end of the aqueduct will be located in an area of Trevor Basin that has little communal value at present, beyond being an area of grass adjacent to, and appreciated in passing, on the journey between the car park and Pontcysyllte Aqueduct. Although passed by many of the 500,000 visitors to the site each year, it is considered unlikely that the site of the CCTV installation has anything other limited value, therefore the northern site is considered to have **low to moderate** communal value. The southern end of the aqueduct is not so well visited as the northern end, as it does not have the visitor car parks at that end, and footfall is thereby noticeably lower. Although the mature trees that enclose the canal corridor on both sides of the southern approach embankment provide a definitively rural feel to the site, the lack of open space means that visitors do not loiter in the area, and therefore have less affinity with it. As a result, the development site at the southern end of the aqueduct is considered to be of lower communal value.

Despite being an undeveloped area on the approach to the Pontcysyllte Aqueduct, the proposed site at the northern end of the aqueduct does make some contribution to the Outstanding Universal Value of the World Heritage Site, in that it forms part of the setting of the centrepiece of the World Heritage Site, and the flat plain on which it stands is part of a large, man-made, plateau that was integral to the operation of the Ellesmere Canal, the aqueduct and Trevor Basin, retained to the east by a large, stone revetment wall. This, and the remaining canal walls, which are part of the designated scheduled monument, are clearly intrinsically linked to the construction of the canal and, therefore, to the notable and significant personnel attributed to its construction, including the renowned engineers Thomas Telford and William Jessop. Similarly, the location of the proposed development at the southern end of the aqueduct lies upon the large, man-made Froncysyllte embankment that forms the springing point for the aqueduct structure and is therefore also an intrinsic part of the canal-related ensemble, and linked to the significant personnel attributed to its construction.

Equally, whilst the specific sites are not currently considered to make a considerable contribution to the appearance or understanding of the canal-focussed conservation area, nor are they specifically acknowledged within the most recent conservation area appraisal, they are in significant locations adjacent to, and in the setting of, a number of listed or scheduled structures, most notably the Pontcysyllte Aqueduct itself.

Considering the relative values placed upon the sites, and consideration of the value they make to placemaking and the understanding of other historic assets in the area, the significance of the proposed development sites is considered to be **high to moderate**.

5.0 Scheme development and proposals

The need to improve public safety at Pontcysyllte Aqueduct has risen as visitor numbers at the site have increased, particularly since inception as a World Heritage Site in 2009, with visitor numbers now in excess of 500,000 per year. The death by misadventure of 19-year-old Kristopher McDowell in 2016, cast a further spotlight on public safety at the site when he fell to his death in the early hours of the morning, having gained access to the non-towpath side of the aqueduct railing, and the baluster he was holding onto came free of the structure resulting in a fall from height. After an inquest, the coroner

issued a *Regulation 28 Report to Prevent Future Deaths* in March 2019, specifically raising the risk to young people of the wide gaps between the handrail balusters.

As previously mentioned, following a design-led project initiated by Glandŵr Cymru to look at making necessary improvements to public safety at Pontcysyllte Aqueduct, a Heritage Impact Assessment has been produced by Donald Insall Associates. This concluded that a proposal including CCTV coverage of the aqueduct would be the least impactful on the significance of both the Grade I listed aqueduct and the scheduled monument. From the outset of the project, it was clear that any proposals for column-mounted CCTV within such a sensitive historic environment as Trevor Basin could have impacts upon the heritage assets that make the place so significant as to warrant inscription as a World Heritage Site and designation as a conservation area. Recognising this, the Glandŵr Cymru Placemaking & Design and Heritage teams have been developing a proposal that would not only be appropriate to the location, but would inflict the minimum of harm upon the setting of the various historic assets that contribute to the significance of the site. The final installation design has been designed to reflect the operational requirements of the installation, and refined by the in-house design team at Glandŵr Cymru, with input from the local Operations Team as well as through ongoing dialogue with the Cadw Inspector of Monuments.

Having gained an understanding of the significance of the location, and the various heritage assets that could be impacted, the first step in the development process was to assess the optimum location for the CCTV columns.

The design and location of the CCTV installations is driven largely by the need to cover the entire length of the aqueduct, and optimise the line of view. The CCTV will not be 'live monitored' but will allow for evidence to be gathered in the event of reported misuse or anti-social behaviour, as well as gathering important data to inform any potential future safety interventions. CCTV is also considered to be an important preventative measure, discouraging dangerous or damaging behaviour. The CCTV installations will require a 5m high column to prevent tampering with the camera equipment, located in fairly close proximity to each end of the aqueduct (figs 11 and 12).



Fig 12: Initial sketch image of CCTV position at northern end of the aqueduct.
(Base image © Google (Image capture August 2013).



Fig 13: Initial sketch image of CCTV at southern end of the aqueduct.
(Base image © Google (Image capture May 2012).

Each column will be powder coated in RAL 7016 'Anthracite Grey' to reduce the visual impact and relate it to the colour of the cast ironwork of the aqueduct trough and handrail. The foundation for the column will be no greater than 1m deep, by 1m square and, in agreement with Cadw, excavation will be covered by an archaeological watching brief. The optimum solution will be for a solar-powered camera installation, with a wireless feed transferring data back to a hub within the Visitor Centre. However, should it be found that the tree canopy prevents adequate solar energy reaching the camera, or that the signal strength is too weak to support a wireless system, then power and/or data cabling may need to be run to the base of the column.

The final design is presented fully in the design drawings that accompany this consent application. The design has been developed in response to the particular need, however the very sensitive context of the chosen sites has been fully considered to ensure they avoid direct impacts upon the fabric of the aqueduct and inflict the minimum of harm upon the setting whilst still being able to perform their primary function. It is recognised that the CCTV installations will have a minor detrimental visual impact upon the setting of the Grade I listed aqueduct, and the conservation area, however, this is considered to be offset by the public benefits to visitor safety and site monitoring that the installations will bring.

6.0 Legislative Framework, Policies & Principles

6.1 Historic Environment (Wales) Act 2023

The primary statutory legislation relating to the historic environment in Wales, and to scheduled monuments in particular, is the Historic Environment (Wales) Act (2023) which repealed and replaced the provisions of both the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990. World Heritage Sites are also covered by the Act, but primarily with regard to record keeping in the local Heritage Environment Record.

Part 4 of the Act deals specifically with conservation areas, and states that, "*In relation to a building or other land in a conservation area, a person must have special regard to the desirability of preserving or enhancing the character or appearance of that area"*. In seeking consent for the installation of the column-mounted CCTV, we are seeking authorisation to undertake works that will have little impact on the character or appearance of the conservation area, and will make the site safer, ensuring visitors are able to safely enjoy the special nature of the area with a better understanding of the potential risks. The column-mounted CCTV installation will also assist in reducing the incidents of anti-social behaviour, such as graffiti, thereby improving and maintaining the quality of the environment.

6.2 Planning Policy Wales (2024)

Planning Policy Wales (2024), which details the Welsh Government's National Planning Policy for the conservation of the historic environment, provides some useful advice on the holistic management of

the historic environment, including World Heritage Sites and conservation areas, as well as advice relating to setting. The historic environment is specifically covered by **Section 6** of Planning Policy Wales – *Distinctive and Natural Places*.

Planning Policy Wales (2024) states that, "*the historic environment comprises all the surviving physical elements of previous human activity and illustrates how past generations have shaped the world around us. It is central to Wales's culture and its character, whilst contributing to our sense of place and identity. It enhances our quality of life, adds to regional and local distinctiveness and is an important economic and social asset" a*nd, through its application, the Welsh Government seeks to maintain specific objectives for the protection of the historic environment including, as outlined within Section 6.1.6, to, "*protect the Outstanding Universal Value of the World Heritage Sites*" and to "*preserve or enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous*". It also states 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*". Due to the numerous designations that affect the development sites, and the close proximity of a number of different historic assets, all of these issues needed to be carefully considered, and appropriately balanced, in the development of designs for the column-mounted CCTV installations.

6.3 Planning Policy Wales Technical Advice Note 24 – The Historic Environment (2017):

Technical Advice Note 24 (TAN24) is a supplementary document to Planning Policy Wales, the purpose of which is to provide guidance on how the planning system, and Welsh Ministers, will consider various aspects of the historic environment in decision making on applications for consent, specifically including World Heritage Sites, scheduled monuments, listed buildings and conservation areas, including their settings.

The issue of setting is defined within Paragraph 1.25 of TAN24, and is pertinent with regard to potential impacts upon both the conservation area and the listed structures immediately to the north and south of the proposed development sites. It states that, "*the setting of an 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. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. Setting is not a historic asset in its own right but has value derived from how different elements may contribute to the significance of a historic asset*". As described in Section 4, the sites for the proposed column-mounted CCTV installations are considered to be of **moderate** to **high** significance, with the installation of the column-mounted CCTV installations considered likely to have a **neutral** to **low adverse** impact on the affected designated heritage assets.

Section 3 of TAN24 deals with World Heritage Sites, and states that, "*local planning authorities must preserve the Outstanding Universal Value of World Heritage Sites by carefully managing development within and adjacent to them*" and that, if the proposed development is considered likely to have a significant impact on the Outstanding Universal Value, then they are required to consult with Cadw. Paragraph 3.14 states that, " *the impacts of proposed development on the Outstanding Universal Value of a World Heritage Site and its setting and, where it exists, the World Heritage Site buffer zone, is a material consideration when determining planning applications*". The net impacts of the proposals upon the OUV have been carefully considered, and are considered to be neutral. Although it is recognised that the proposed column-mounted CCTV installations will have a minor visual impact upon the wider context of Pontcysyllte Aqueduct and Trevor Basin, the design is in keeping with the overall quality of the visitor destination as a whole. The Outstanding Universal Value of the Pontcysyllte Aqueduct and Canal World heritage Site will remain largely unaltered by the installation whilst public safety and prevention of anti-social behaviour will improve as a result. As the southern CCTV

installation lies within the boundary of the scheduled monument, discussions have already been held with Cadw, and a separate application for Scheduled Monument Consent has been submitted.

6.4 The Local Plan

Following the recent unadoption of the Wrexham Local Development Plan 2023 – 2028, the Local Plan now comprises the previously adopted *Wrexham Unitary Development Plan 1996 – 2011* and *Future Wales – The National Plan 2040*.

6.4.1 Future Wales – The National Plan 2040.

Policy 22 of the National Plan is about managing growth and, although specifically about managing green belts in North Wales, it does include the following statement: "*Managing the North's outstanding historic and natural resources is a priority for the region. Outstanding places include … the Pontcysyllte Aqueduct and Canal … World Heritage Site. They should be protected for the enjoyment of future generations and help to provide economic benefits for the region's communities. The region's distinctive heritage should be preserved and enhanced by high quality development*".

6.4.2 Wrexham Unitary Development Plan 1996-2011

Policy GDP1 of the UDP states that, "*all 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*". The proposed column-mounted CCTV installations have been carefully considered to ensure that they are as visually unobtrusive as possible, and are appropriately coloured to closer relate to the other metalwork associated with the historic assets.

The primary UDP policies relating to heritage assets are contained within Section 5: Environment & Conservation. Policy EC7 relates to conservation areas, and states, "*within, and in close proximity to, conservation areas, the priority will be to preserve and/ or enhance those buildings, structures, streets, trees, open spaces, archeological remains, views, and other elements which contribute to the unique character of the area. New buildings and alterations or additions to existing buildings in conservation areas, whether listed as of special architectural or historic interest or not, must reflect the design and character of the area as a whole and the form, scale, detailing and materials of existing buildings*". As stated above, the proposed designs for the column-mounted CCTV installations, whilst having to be capable of carrying out the function for which they are intended, have been designed to inflict minimal visual harm upon the setting and visual amenity of their respective sites, or upon views of the assets or of the wider landscape. This means that it is aligned with paragraph 5.9 which states that, "*within conservation areas, development should ensure design compatibility, and should respect the various elements which give them their unique character (e.g. the mix and grouping of buildings, variety of spaces, movement routes, materials, architectural detailing, patterns of land use, landscaping, etc.)"*

Policies EC9 and EC11 relate to the impacts upon the setting of listed buildings and scheduled monument respectively. Policy EC9 states that, "*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"* and policy EC11 states that "*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 will also be carefully controlled to ensure that the setting of non-scheduled sites of archaeological importance is not harmed where appropriate*". Paragraph 5.13 reiterates the point that archaeological remains, such as scheduled monuments are, "*a vital part of the County Borough's heritage and provide a key record of the history and culture of the local area. They are important both for the information they provide about the past, and for their role in education, leisure, and tourism; they are a finite asset, which must not be needlessly destroyed… the desirability of preserving an [ancient] monument and its setting is a material consideration in determining planning applications whether that monument is scheduled or unscheduled*". As

discussed previously, care has been taken to minimise the impact upon the fabric, and setting, of the designated assets and these interventions will not impact upon how the scheduled monument is understood and appreciated.

6.5 Managing Change in World Heritage Sites in Wales (2017)

The Pontcysyllte Aqueduct and Canal World Heritage Site was transcribed in 2009, and a major element in understanding the significance of the site is the Statement of Outstanding Universal Value:

"The Pontcysyllte Canal is a remarkable example of the construction of a human-engineered waterway in a difficult geographical environment, at the end of the 18th century and the start of the 19th century. It required extensive and boldly conceived civil engineering works. The Pontcysyllte Aqueduct is a pioneering masterpiece of engineering and monumental architecture by the famous civil engineer Thomas Telford. It was constructed using metal arches supported by tall, slender masonry piers. The Pontcysyllte Aqueduct and Canal are early and outstanding examples of the innovations brought about by the Industrial Revolution in Britain, where they made decisive development in transport capacities possible. They bear witness to very substantial international interchanges and influences in the fields of inland waterways, civil engineering, land-use planning, and the application of iron in structural design".

Cadw Guidance, *'Managing Change in World Heritage Sites in Wales' (*2017*)* sets out general principles for understanding and managing World Heritage Sites in Wales, including how they are protected through the planning system. It recognises that, *"change [within a World Heritage Site] is inevitable and needs to be managed carefully so it does not threaten the Outstanding Universal Value of a World Heritage Site. This does not mean that change is prevented; simply, that it is managed to allow the sustainable use of the landscape, while retaining what is important from the past and protecting the Outstanding Universal Value of the World Heritage Site". It goes on to state that, "the impact of change can be beneficial, neutral or detrimental in its effect on the Outstanding Universal Value of a World Heritage Site".*

Glandŵr Cymru believe that the installation of the column-mounted CCTV cameras would be a change that increases visitor safety, to the benefit of all, as well as reducing instances of anti-social behaviour that can have a direct and detrimental impact on the fabric and appreciation of the assets within the World Heritage Site. The proposals will not have a significantly detrimental impact upon the Outstanding Universal Value of the World Heritage Site, or on the conservation area. The proposals therefore accord with the stated aim that, "*World Heritage Sites are places to cherish and celebrate forever. We want to foster better understanding of their history and what makes them internationally significant so that people care about them and unlock the opportunities they offer through improved global recognition, tourism, regeneration and lifelong learning."*

6.7 The Setting of Historic Assets in Wales (2017)

Since the proposals will have an impact on the setting of the Grade I listed and scheduled Pontcysyllte Aqueduct, as well as the World Heritage Site and conservation area, it is also worth considering the guidance set out in Cadw's document *Setting of Historic Assets in Wales*. This document provides a more detailed definition of setting:

"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. Elements of a setting may make a positive, negative or neutral contribution to the significance of an asset.

Setting is not itself a historic asset, though land within a setting may contain other historic assets. The importance of setting lies in what it contributes to the significance of a historic asset.

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 setting of a historic asset can also include less tangible elements. These may include function, sensory perceptions or historical, artistic, literary and scenic associations".

The document acknowledges that whilst, "...*changes may have a negative impact on the significance of an asset; for example, the loss of the surrounding physical elements that allow an asset to be understood or the introduction of an adjacent new development that has a major visual impact"* it is entirely possible that*, "changes can also have a positive impact that may enhance the setting..."* The proposed installation of the column-mounted CCTV cameras at each end of the aqueduct, due to their necessary proximity in order to fulfil their intended function, are considered likely to have a visual impact upon the setting of the historic assets, and most notably the Grade I listed and scheduled Pontcysyllte Aqueduct itself, the centrepiece to the World Heritage Site. However, these installations will also monitor visitor interaction with the aqueduct and reduce incidences of anti-social behaviour which, themselves, have a detrimental impact on the historic fabric of the asset and have a detrimental impact upon the perception of the conservation area and the World Heritage Site. The visual impacts of the proposed interventions are generally considered to be **low adverse** and, on balance, the impacts on the setting are considered to be outweighed by the benefits to public safety and reduction in anti-social behaviour.

6.8 Conservation Principles for the sustainable management of the historic environment in Wales

Cadw's Conservation Principles have already been discussed, to some extent, within Section 4 of this document, which considered the significance of the relative assets related to each site. The Conservation Principles document is explicit that, "*every conservation decision should be based on an understanding of its likely impact on the significance of the fabric and other aspects of the site concerned*" and, having undertaken an assessment of the significance of the relevant sites to both the north and south of the aqueduct in Section 4.0, it has been concluded that the sites are of **high significance**, especially when considered against the context of the World Heritage Site and the surrounding designated heritage assets. The Conservation Principles recognise that, "*[The] historic environment is ... a fragile resource. We have an obligation and duty to manage change in a sensitive and sustainable way and to ensure that what is significant is passed on to future generations"* but also recognises that, "*the historic environment is an asset, not a barrier to change*".

Conservation Principle 1 acknowledges that, "c*hanges in the historic environment are inevitable*" and that, "*conservation is the careful management of change. It is about revealing and sharing the significance of historic assets and ensuring that their special qualities are protected, enhanced, enjoyed and understood by present and future generations"*.

Principle 3 states that, "*each generation is ... responsible for shaping and sustaining the historic environment to enable people to use, enjoy and benefit from it, without compromising the ability of future generations to do the same"*. Glandŵr Cymru believe that the positive benefits of the proposed safety improvements and site monitoring will enable the continued, safe enjoyment of the site, reducing the potential impacts of anti-social behaviour, without impacting upon the understanding and enjoyment of the historic environment.

When applying the conservation principles, Cadw states that, *"every reasonable effort should be made to eliminate or minimize adverse impacts on historic assets. Ultimately, however, it may be necessary to balance the benefit of the proposed change against the harm to the asset. If so, the weight given to heritage values should be proportionate to the importance of the assets and the impact of the change upon them"*. Considerable effort has been made to protect the principal heritage assets from physical harm, whilst ensuring that the individual elements of the proposal are located in such a way that they are able to undertake their primary functions effectively. Any perceived harm arising from the installation of the new column-mounted CCTV cameras will largely be that of visual impact upon the setting and context of the adjacent heritage assets, and any harm this might have on the values of those assets. Section 4 of this document assesses the significance of the assets affected by the proposals, and Section 9, below, assesses the relative impacts the installations will have upon the historic assets

concluding that, on balance, the installation of column-mounted CCTV cameras will have a neutral to low adverse impact on the historic environment.

New work and alterations within the historic environment is covered with 'Conservation Principles in Action' Section, and paragraph 28 states that, "*new work or alteration to an historic asset will normally only be acceptable if:*

a. *the need for the work is fully justified; and*
b. *there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the asset; and*
c. *the proposal would not materially harm the values of that asset, which, where appropriate, would be reinforced or further revealed; and*
d. *the quality of design and execution must add value to the existing asset; and*
e. *the long-term consequences of the proposals can, from experience, be demonstrated to be benign, largely reversible or be designed not to prejudice alternative solutions in the future".*

This document, and the accompanying documentation, is intended to demonstrate compliance with the above, and that the proposals should be acceptable in principle.

Paragraph 29 goes on to state that, "*few sites are so sensitive that they, or their settings, present no opportunities for the addition of new work*" and with the relative impacts of the proposed interventions considered to be low, Glandŵr Cymru believe that the public benefits of the proposed safety improvements and site monitoring outweighs any adverse impacts upon the affected heritage assets, and will bring positive benefits in terms of reducing the adverse impacts anti-social behaviour can have on the assets and the wider area.

7.0 Pre-application advice

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.

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.

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.

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 Impact Statement

As detailed in Section 4.0 of this report, the respective sites for the column-mounted CCTV cameras are considered to be **highly significant** insofar as they both sit within a World Heritage Site and a Conservation Area, and the southern CCTV site being situated within the boundary of the scheduled monument. The proposed CCTV installation to the north of the aqueduct will impact upon the setting of two Grade II listed structures, the Dry Docks (Asset Ref 87547) and Bridge 31 (Asset Ref 19969), as well as the Grade I and scheduled Pontcysyllte Aqueduct itself, with the greatest impact being upon the latter. As well as having a direct impact upon the scheduled Froncysyllte embankment, the southern

column-mounted CCTV installation will also, due to its proximity to the southern end of the aqueduct structure, have an indirect impact upon the setting of the Grade I listed and scheduled Pontcysyllte Aqueduct.

When considering the impact of development upon the significance of a heritage asset it is helpful to attribute specific values to the level of perceived harm resulting from those impacts, these can be considered as:

High Adverse – the development substantially affects the identified heritage values or the ability to appreciate those values

Moderate adverse – the development erodes, to a clearly discernible extent, the identified heritage values or the ability to appreciate those values

Low adverse – the development erodes to a minor extent the identified heritage values or the ability to appreciate those values

Neutral – the development does not change the identified heritage values or ability to appreciate these values

Beneficial – The development enhances identified heritage values or ability to appreciate these values

When assessing the heritage impacts of the proposed column-mounted CCTV cameras, it is perhaps best to assess the potential impacts upon each of the various designated assets, those being the World Heritage Site, the scheduled monument, the conservation area and the Grade I listed and scheduled aqueduct.

8.1 World Heritage Site

The World Heritage Site holds Outstanding Universal Value (OUV) as a masterpiece of historic transport development and as the greatest work of two outstanding figures in the history of civil engineering

The direct impacts of the proposed interventions upon the World Heritage Site, as a whole, are considered to be **neutral**, as the designs have been carefully considered so as to minimise direct impacts on the fabric of any of the principal constituent parts that contribute to the designation of the canal network as a heritage asset of Outstanding Universal Value, nor are they considered to adversely impact the authenticity or integrity of the World Heritage Site or its associated values.

Through thoughtful and judicious choices with regard to positioning and colour, the new interventions sit relatively comfortably within the historic context, rather than detracting from the adjacent designated heritage assets.

As discussed, the canal structures such as the aqueduct and the southern embankment, as well as Trevor Basin are heritage assets of **very high significance** and the wider impacts upon them must therefore be very carefully considered. However, as the proposed interventions have been specifically and carefully designed to minimise or avoid entirely any physical impact on the fabric of the heritage assets, the impacts are largely indirect and affect matters of setting, rather than being direct impacts on the fabric and understanding of the canal itself. The proposed CCTV installation is clearly a new intervention and therefore it does not impact upon the understanding of the historic use and development of the canal. Nor does it impact negatively upon the intangible values of the World Heritage Site, such as how one appreciates or understands the impacts of the canal upon the wider landscape, or the aesthetic qualities of Pontcysyllte Aqueduct or Trevor Basin. The proposed column-mounted CCTV camera installations are therefore considered to have low to no impact upon its key values and, as such, are considered to a have **neutral** impact upon the Outstanding Universal Value of the World Heritage Site, and any harm resulting from their presence is considered to be less than substantial, outweighed by the public benefits that can be attributed to the improvements in visitor safety and monitoring the interventions will bring.

8.2 Scheduled Monument

The proposed CCTV column proposed to the southern end of the aqueduct is situated upon the Froncysyllte embankment, which forms the southern approach to the Pontcysyllte Aqueduct, and this feature lies within the boundary of the scheduled monument, so the impacts of these interventions will

be direct, as well as affecting the visual amenity and setting. The CCTV installation at the northern end of the aqueduct lies outside of the scheduled monument boundary, but there will be indirect impacts upon setting.

The direct impacts on the elements of the canal infrastructure that make up the scheduled monument lie in the requirement for foundations for the CCTV column on the Froncysyllte embankment, as well as any utilities trench that may be required. As discussed in Section 5, the CCTV column will need to be 5 metres in height to prevent unwarranted access to the CCTV camera assembly, including any solar panels, and this will therefore require an appropriate foundation pad, located within the towing path, of no greater than 1 metre deep and 1 metre square. The optimum solution for the CCTV camera installation will be for it to be solar-powered, with a wireless feed transferring data back to a hub within the Visitor Centre. However, should it be found that the tree canopy prevents adequate solar energy reaching the camera, or that the signal strength is too weak to support a wireless system, then power and/or data cabling may need to be run to the base of the column.

The indirect impacts upon the scheduled monument lie in the potential of the proposals to impact upon the visual quality and understanding of the canal infrastructure. Due to the relative slenderness of the CCTV columns, which will largely be viewed against a backdrop of trees, the visual impacts of the proposed interventions upon the scheduled monument are considered to be low and not detrimental to the appreciation or understanding of the canal as an historic asset. The selected materials clearly distinguish the new installations as modern interventions and, in order to reduce the visual impact of the CCTV columns they are to be powder coated in RAL 7016 'Anthracite Grey' which will relate it to the colour of the cast ironwork of the adjacent aqueduct trough and handrail.

The proposals have been developed in response to a particular need, and to the very sensitive context of the chosen sites. As such, the impacts upon the scheduled monument are considered to be **low adverse**.

8.3 Conservation Area

Whilst the CCTV installation may appear slightly incongruous in the historic environment, every attempt has been made to make these as inobtrusive as current installations allow, with the columns being powder coated to RAL 7016 'Anthracite Grey' which relates closely to the colour of the cast ironwork of the adjacent aqueduct trough and handrail. The CCTV columns will largely be seen against a backdrop of adjacent trees which will further reduce their visual impact within the conservation area. The proposed solar panels will be as small as possible, whilst allowing the cameras to function as intended.

It is felt that, overall, the proposed interventions will have a **neutral** impact on the aesthetic qualities and significance of the Conservation Area and are therefore considered to preserve and enhance the character and appearance of the Conservation Area.

8.4 Grade I Listed Pontcysyllte Aqueduct

The locations of the proposed column-mounted CCTV cameras has been carefully considered to ensure that there are no direct impacts upon the historic fabric of the Grade I listed Pontcysyllte Aqueduct.

The CCTV columns and associated camera equipment will need to be positioned relatively close to the listed aqueduct in order to carry out the function for which they are intended; to monitor use of the aqueduct and record any instances of misuse or anti-social behaviour. However, their relative positions have been chosen so as to have no direct impact on the fabric of the aqueduct. As a result of their proximity, the CCTV columns are considered likely to have a visual impact upon the setting of the Grade I listed aqueduct although, as mentioned above, their slenderness, dark colour and the backdrop of trees against which they will be seen will reduce the relative impacts.

The impacts upon the Grade I listed Pontcysyllte are considered to be **neutral** to **low adverse.**

9.0 Justification Statement

It is incumbent upon Glandŵr Cymru to ensure that visitors to the Pontcysyllte Aqueduct can do so safely, whilst also protecting the significance and special character of the site which is such an

attraction to over 500,000 visitors a year. With the increase in visitor numbers comes increased pressures on the historic assets, and Glandŵr Cymru accept that some changes need to be made to the site to improve visitor safety and raise awareness of the incumbent risks the site poses, as well as improved monitoring of the site to prevent misuse and reduce anti-social behaviour.

As articulated in the Heritage Impact Assessment produced by Donald Insall Associates in 2025, the proposals for monitoring were assessed as being an element that would upgrade the safety requirements at the site with the least impact upon the fabric and significance of the historic environment, providing the Glandŵr Cymru with a greater ability to both manage and monitor the use of the asset by the general public, whilst also providing the opportunity to collect important data for any future safety interventions.

10.0 Conclusion

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.

ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage properties states that *"every reasonable effort should be made to eliminate or minimize adverse impacts on historic assets. Ultimately, however, it may be necessary to balance the benefit of the proposed change against the harm to the asset. If so, the weight given to heritage values should be proportionate to the importance of the assets and the impact of the change upon them"*.

The World Heritage inscription recognises that, "p*ressure from tourism exists close to the canal and in the buffer zone"* and goes on to state, "*only projects that are in keeping with the expression of the canal's values are authorised by the regulatory and management system, as regards both the property and the buffer zone*". Glandŵr Cymru takes the designation and management of the World Heritage Site very seriously and, after careful consideration of the impacts, are of the opinion that the current proposals, which have been carefully designed in direct response to the specific locations, taking into account the values, significance and special interest of the historic assets, and benefitting from ongoing dialogue and input from Cadw inspectors, meets the necessarily high expectations placed upon any development within the World Heritage Site.

Conservation philosophy in the 21st century has seen a shift away from preventing change to heritage assets towards a recognition that heritage assets need to adapt to modern uses, and to managing such changes in an appropriate way that does not damage the significance or special interest of the site. The proposals for the column-mounted CCTV installations that this application seeks consent for have been carefully considered with the primary heritage objective of safeguarding the significance and values of the site. Care has been taken to ensure that any features of significance within the immediate setting remain undisturbed, whilst providing the opportunity for visitors to interact better, and more

safely, with the site and the wider environment, allowing for continued understanding of the historic environment and bringing benefits to the local community.

11.0 Sources:

Arcadis; Pontcysyllte Aqueduct and Canal World Heritage Site Conservation Management Plan 2019-2029

BSI 7913:2013 - Guide to the conservation of historic buildings, 2013

Cadw: Conservation Principles for the sustainable management of the historic environment in Wales, 2011

Cadw: Heritage Impact Assessment in Wales, 2017

Cadw; Managing Change in World Heritage Sites in Wales, 2017

Cadw; Managing Conservation Areas in Wales, 2017

Cadw: Managing Scheduled Monuments in Wales, 2018

Cadw: Setting of Historic Assets in Wales, 2017

Cumberlidge, J; Inland Waterways of Great Britain, 8th Ed., 2009

Department for Digital, Culture, Media & Sport; Scheduled Monuments & nationally important but non-scheduled monuments, 2013

ICOMOS: Guidance on Heritage Impact Assessments for Cultural World Heritage properties, 2011

Senedd Cymru: Historic Environment (Wales) Act 2023 (rev. November 2024)

Welsh Government: Planning Policy Wales, 12th Ed. 2024

Welsh Government: Planning Policy Wales Technical Advice Note 24 – Historic Environment, 2017

Wrexham, Denbighshire & Shropshire Councils; Local Planning Guidance Note 33 (June 2012)

Wrexham Conservation Area Assessment & Management Plan (2009)

Appendix A:
Statement of Outstanding Universal Value

Brief synthesis:
The Pontcysyllte Canal is a remarkable example of the construction of a human-engineered waterway in a difficult geographical environment, at the end of the 18th century and the start of the 19th century. It required extensive and boldly conceived civil engineering works. The Pontcysyllte Aqueduct is a pioneering masterpiece of engineering and monumental architecture by the famous civil engineer Thomas Telford. It was constructed using metal arches supported by tall, slender masonry piers. The Pontcysyllte Aqueduct and Canal are early and outstanding examples of the innovations brought about by the Industrial Revolution in Britain, where they made decisive development in transport capacities possible. They bear witness to very substantial international interchanges and influences in the fields of inland waterways, civil engineering, land-use planning, and the application of iron in structural design.
Criterion (i): The Pontcysyllte Aqueduct is a highly innovative monumental civil engineering structure, made using metal arches supported by high, slender masonry piers. It is the first great masterpiece of the civil engineer Thomas Telford and formed the basis of his outstanding international reputation. It bears witness to the production capacities of the British ironmaking industry, which were unique at that time.
Criterion (ii): The intensive construction of canals in Great Britain, from the second half of the 18th century onwards, and that of the Pontcysyllte Canal in particular in a difficult region, bear witness to considerable technical interchanges and decisive progress in the design and construction of artificial waterways.
Criterion (iv): The Pontcysyllte Canal and its civil engineering structures bear witness to a crucial stage in the development of heavy cargo transport in order to further the Industrial Revolution. They are outstanding representatives of its new technical and monumental possibilities.

Integrity and authenticity
The integrity of the waterway has been maintained in hydraulic and civil-engineering structures that have remained in their original form. However, the historic embankments, made of rubble, have raised significant problems of stability and waterproofing, particularly in the second half of the 20th century. The repairs have involved the use of technical solutions that are different from the simple initial backfills, both for structural resistance and waterproofing: concrete, steel pilings, geotextiles, etc. From the point of view of integrity, these works have made it possible to maintain the hydraulic operation of the waterway and to conserve its overall morphological characteristics. The integrity of the landscapes and the buffer zone of the property contributes to the expression of the value of the property. The property has all the elements of integrity necessary for the expression of its value, as a major historic canal of the Industrial Revolution. The few structural changes that have been made to the two large aqueducts have remained secondary, contributing to maintaining the property in use. Changes in materials have remained restricted over the history of the property. During the 20th century repairs to masonry did not always use the original types of mortar or stone. The buildings associated with the canal and its immediate environment usually achieve a good degree of authenticity.

Protection and management requirements
The technical and monumental management by British Waterways is satisfactory. The management plan is acceptable; it clearly defines the objectives of conservation, but it would be improved by a unified approach to the preservation of the buffer zone and the drafting of a plan for tourism development and site interpretation.

Appendix B:

Summary Description of a Scheduled Monument (Full Report)

Reference Number:
DE175
Name:
Pontcysyllte Aqueduct and Canal
Date of Designation:

Status:
Designated

Location
Unitary Authority:
Wrexham
Community:
Llangollen Rural
Easting:
326355
Northing:
340746
Broad Class:
Water Supply and Drainage
Site Type:
Aqueduct
Period:
Post Medieval/Modern

Description
Summary Description and Reason for Designation:

Built between 1795 and 1808, the Pontcysyllte Aqueduct and Canal comprise an exemplary group of civil engineering features from the heroic phase of transport improvement that accompanied the Industrial Revolution. The Principal Engineer for the canal was William Jessop (1745-1814), one of the most important canal and dock engineers of the day. The General Agent was Thomas Telford (1757-1834), then a little known county surveyor, but to become the most prolific civil engineer of the early nineteenth century. Owing to its particular daring and elegance, the Pontcysyllte Aqueduct is regarded as a spectacular masterpiece of waterways engineering and an influential pioneer of iron construction. The sections of canal that extend c.10 km to the west (to Llantysilio) and c. 6 km to the south (to Chirk) from the aqueduct exemplify the new approaches to engineering developed in Britain during the Industrial Revolution and taken up in subsequent waterway, railway and road construction throughout the world. All of the features that were to become characteristic of heavily-engineered transport routes can be seen along the canal: features such as tunnels, cuttings, aqueducts and embankments, many of them technically innovative or of monumental scale, together with associated bridges, culverts and weirs. Pontcysyllte Aqueduct and Canal are part of the Ellesmere Canal scheme that was promoted by Act of Parliament in 1793. The primary purpose of the scheme was to permit industrial development in the Denbighshire coalfield by linking it to external markets. The canal carried boats hauled by horse from a parallel towing-path. The main line of the canal ends at Trevor Basin, on the north side of Pontcysyllte Aqueduct. The Llangollen Branch of the canal extends to the west from Trevor Basin, along the north bank of the steep-sided Vale of Llangollen. Although proposed as early as 1791 it was begun

under an Act of Parliament of 1804 and completed in 1808. Its purposes were to serve the town of Llangollen and adjacent industries and to bring a large and reliable supply of water into the main canal system from a new weir on the River Dee at Llantysilio. This section of canal was narrower than the main line, but achieved a similarly direct and level route by way of considerable engineering works. The canal is at its narrowest in its last section, from Llangollen to Llantysilio, where its primary function is as a water feeder. The extraction point is the Horseshoe Falls, an elegant, curved cast-iron and masonry weir on the River Dee that was built to supply the canal. The monument is of national importance as the masterpiece of two exceptional figures from the heroic phase of civil engineering in the late eighteenth and early nineteenth centuries, reflecting the crucial developments within inland navigation, civil engineering and the use of iron. It is an outstanding example of the pivotal importance of transport improvement to the Industrial Revolution. As the largest civil engineering projects of their day, canal construction projects were responsible for numerous organisational and technical innovations. Pontcysyllte Aqueduct and Canal is an exemplary manifestation of the innovations which produced the British canals system and were carried forward into the development of later railways, roads and industrial projects. In organisation, innovations included principles of contract management, delegation of duties within engineering teams and the professional independence of engineers. In technology, innovations included hollow masonry and new waterproofing methods to reduce weight, composite use of cast iron and stone, earthwork calculations, construction railways, barrow inclines and cut-and-cover tunnels. The outstanding feature of the Scheduled Ancient Monument is the Pontcysyllte Aqueduct, originally scheduled in 1958. However, the original designation did not reflect the sophistication of the engineering of the canal or the importance of the earlier Chirk Aqueduct (where Thomas Telford and William Jessop experimented with the use of cast iron) and the Schedule entry has been revised to include the entire length of the Llangollen Branch (including the weir at the Horseshoe Falls and the Pentrefellin Aqueduct), Trevor Basin and the heavily engineered canal section south of Pontcysyllte (including the Froncysyllte Embankment; the Chirk Tunnel and Whitehouse Tunnel; the Canal Wood Cutting and Irish Bridge Cutting; and the Chirk Basin and Aqueduct). The scheduled area comprises the remains described and an area around them within which related evidence may be expected to survive. The scheduled area includes the canal, its towpath and immediate banks, cuttings and embankments. Where the canal comprises an architectural structure (such as an aqueduct or tunnel), that architectural structure is included in its entirety. Where the canal comprises an earthwork structure (such as an embankment or cutting), that earthwork structure is included in its entirety. Excluded from the schedule are the Llangollen Marina, the Chirk Marina and the many over bridges and associated buildings that line the canal and its wharves and basins (most of which are more appropriately protected under the Planning [Listed Buildings and Conservation Areas] Act 1990).