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Planning Services
Wrexham County Borough Council

By Email

Eich cyfeirnod Your reference	P/2026/0253
Ein cyfeirnod Our reference	
Dyddiad Date	18 May 2026
Llinell uniongyrchol Direct line	0300 0257894
Ebost Email:	Cadwplanning@gov.wales

Dear Sir/Madam

Planning Application – Installation of two pole mounted CCTV cameras at Pontcysyllte Aqueduct, Llangollen.

Thank you for your letter inviting our comments on the information submitted for the above planning application.

Advice

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

Having carefully considered the information provided, we have no objection to the proposed development in regards to the scheduled monuments or registered historic parks and gardens listed in our assessment of the application below.

The national policy and Cadw's role in planning are set out an Annex A.

Assessment

Scheduled Monuments
DE175 Pontcysyllte Aqueduct and Canal

World Heritage Sites:
Pontcysyllte Aqueduct and Canal

The proposed southern pole is located inside scheduled monument DE175 Pontcysyllte Aqueduct and Canal with the northern on being immediately adjacent to the boundary. Both Poles are inside the boundary of the Pontcysyllte Aqueduct and Canal World Heritage Site.

The application is accompanied by Heritage Impact Assessment produced by the Canals and Rivers Trust in Wales, which 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.

The Heritage Impact Assessment concludes that there will be neutral to low adverse impact on the scheduled monument and outstanding universal value of the World Heritage Site with any perceived harm outweighed by the public benefits. We agree with that conclusion.

As noted above, the southern pole is located inside scheduled monument DE175. An application for scheduled monument consent has been submitted for the proposed works but has not yet been determined. As Planning Policy Wales section 6.1.23 indicates that the conservation of archaeological remains and their settings is a material consideration in the determination of planning application you may wish to defer determination of the planning application until the scheduled monument consent has been determined. However, if they wish to proceed to determine the current planning application following the advice given by their internal expertise, they should not place conditions on any consent that is granted regarding archaeological works or conservation requirements inside the scheduled monument, as these would duplicate any conditions which are attached to the scheduled monument consent. The duplication of conditions would be contrary to the advice given in section 3.6 of Welsh Government Circular WGC 016/2016 “The Use of Planning Conditions for Development Management.”

Yours sincerely

Nick Segust
Case Officer
Historic Environment Inspectorate

Cadw

Annex A

Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

National Policy

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Technical Advice Notes and related guidance.

PPWgov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdfexplains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)

Technical advice note (TAN) 24: the historic environment | GOV.WALES elaborates by explaining that when considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains.

Historic Parks and Gardens

PPW also explains that local authorities should value, protect, conserve and enhance the special interests of parks and gardens and their settings included on the register of historic parks and gardens in Wales and that the effect of a proposed development on a registered park or garden or its setting should be a material consideration in the determination of a planning application.