Cadw

Llywodraeth Cymru
Parc Busnes Rhydycar
Merthyr Tudful
CF48 1UZ
cadw.llyw.cymru

Welsh Government
Rhydycar Business Park
Merthyr Tydfil
CF48 1UZ
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Jenni Perkins,
Wrexham County Borough Council

planning@wrexham.gov.uk

Eich cyf/Your ref: P/2026/0018

Ein cyf/Our ref:

Dyddiad/Date: 23 July 2026

Dear Jenni,

Planning Application - COU of land for use as electric bike track
LOCATION: X 328200 Y 353100, Land North East of Brymbo Road, Brymbo, Wrexham, LL11 5LS
REF: P/2026/0018

Thank you for your letter of 12 March 2026 inviting our comments on the information submitted for the above planning application.

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

Advice

We have significant concerns about the impact on the scheduled monument. However, we consider that if mitigating measures were undertaken, our concerns about the impact would be reduced.

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

Assessment

DE203 Penrhos Engine House

Cadw have investigated the damage to the scheduled monument in the ownership of the applicant. We have found that a long-standing agricultural track crosses the designated area, which is used to access a hard standing used for feeding stock. The rutting has been caused by agricultural vehicles accessing the hard standing in bad weather. This track will no longer be required following the construction of the bike track. As such, damage to the scheduled monument will cease once the bike track is approved. Consequently, Cadw can remove our objection to the granting of consent to the current application, but a condition

should be attached to any consent granted. This condition will require the applicant to repair the damage to the scheduled monument and ensure that damage does not occur in the future. It is suggested that this condition is worded:

An archaeological management plan for the area of scheduled monument DE203 in the control of the applicant will be submitted to the LPA and Cadw and approved and implemented before the first use of the carpark.

Yours sincerely,

Annabel Hay
Historic Environment Inspectorate / Arolygiaeth yr Amgylchedd Hanesyddol

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Annex A

Our role

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

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

National Policy

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

PPW Planning Policy Wales - Edition 12 (gov.wales) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

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

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

Historic Parks and Gardens

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