

Eich cyfeirnod
Your reference

Ein cyfeirnod
Our reference

Dyddiad
Date

17 April 2025

Llinell uniongyrchol
Direct line

Ebost
Email:

cadwplanning@gov.wales

Dear Sir/Madam

Statutory pre-planning application consultation for a proposed Battery Energy Storage System (BESS) on land between Corwen and Gwyddelwern.

Thank you for your letter inviting our comments on the pre-planning application consultation for the proposed development described above.

The following comments are based on information made available to us as part of the pre-application consultation and we will review our comments when we are consulted on the final planning application. Our assessment of the pre-application is given below.

Advice

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

Full details of the additional information that is required are explained in the below assessment.

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

Assessment

**DE252 Mynydd Rhyd Ddu Enclosure
ME012 Caer Drewen Camp
ME019 Rug Mound
ME025 Bwrdd y Tri Arglwydd Boundary Stone
ME047 Rhug ornamental wrought iron gates
ME051 Moel Fodig Camp
ME052 Corwen Churchyard Cross
ME089 Capel y Rug**

The application will be accompanied by an environmental statement prepared by Tetrattech with Chapter 6 considering the impact on Heritage and Archaeology with appendix 6.2 assessing the impact of the proposed development on the setting of historic assets. This assessment has considered the impact on the above scheduled monuments that are located inside 3km of the proposed development. It has concluded that there will be significant effects on the settings of scheduled monuments ME012 Caer Drewen Camp and ME051 Moel Fodig Camp during the construction phase of the proposed development and for the initial operational period, although these effects may be reduced to less than significant once vegetation planted as part of the mitigation measures has become fully grown. The effect of the proposed development on the other scheduled monuments will not be significant. We concur with these conclusions.

A Construction Environment Management Plan (CEMP) will be prepared which will control dust, noise and working hours, as well as introducing approved routes for plant and for the removal of arisings that will provide some mitigation of the effect of the construction works on the settings of the scheduled monuments but these measures are not sufficient to reduce the effect of the works to a scale that is not significant. Likewise, the proposals to mitigate the operational effect of the proposed development by the planting of additional trees and hedges to block and screen it in views from the scheduled monuments will not become effective for a number of years. It is therefore clear that additional mitigation measures to reduce the effect of the proposed development on the settings of scheduled monuments ME012 Caer Drewen Camp and ME051 Moel Fodig Camp need to be included in the development proposals, if the identified adverse effects on their settings will be acceptable. If sufficient mitigation measures are not possible, then the applicant will need to consider including appropriate offsetting measures to compensate for the damage to the settings of the scheduled monuments.

The environmental statement has also identified that a Roman road crosses the application area and geophysical survey has identified a number of anomalies that could represent archaeological sites. The nature, extent and condition of these potential archaeological sites needs to be determined prior to the completion of the environmental statement. This will require archaeological evaluation of the application area to be carried out and the results of this work will need to be included in the environmental statement.

The application for this proposed development will be submitted to Denbighshire County Council. Consequently, advice on the impact of the proposed development on the settings of listed buildings will be provided by the Local Planning Authority's Conservation Officer. As the environmental statement identifies that there are a number of significant adverse effects on the setting of listed building it is strongly recommended that the Conservation Officer is consulted on this proposed development.

Finally, there may also be undesignated historic assets that could be affected by the proposed development and, if you have not already done so, we would advise that you consult the Historic Environment Record held by www.heneb.co.uk

Yours sincerely



Case Officer
Historic Environment Branch

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 24: The Historic Environment](#) 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.