

WSP

Eich cyfeirnod  
Your reference

By email

Ein cyfeirnod  
Our reference

Dyddiad  
Date

15 February 2024

Linell uniongyrchol  
Direct line

Ebost  
Email:

Dear Sir/Madam

## **Pre-Planning Application - Reclamation and remediation of Bedwas Tips**

Thank you for your letter of 25 January 2024 inviting our comments on the pre-planning application consultation for the proposed development described above.

### Advice

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.

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.

Our assessment of the pre-application is given below.

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

### Assessment

#### Scheduled Monuments

GM002 Caerphilly Castle

GM051 Bryn Owen Farm Cairns, Llanfabon

GM218 Gwern-y-Domen Castle Mound

GM357 Rudry Ironworks

GM440 Cornish Type Engine House, Bryngwyn Colliery

GM516 Machen Forge and Tinsplate Works

MM033 Twyn Cae-Hugh Round Barrow

MM035 Twyn Tudor

MM044 Twm-Barlwm Mound and Bailey Castle

MM070 Twyn-Yr-Oerfel Round Barrows

MM071 Begwns Round Barrow, Mynydd Machen



MM143 Bedwas Churchyard Cross  
MM149 Pen-y-Rhiw Round Cairn  
MM186 Castell Meredydd  
MM196 Cairn Cemetery on Mynydd Bach, Bedwas  
MM259 Former Dam of Cwmcarn Canal Reservoir  
MM337 House Platforms to W of Mynydd Machen

Registered Parks and Gardens:  
PGW(Gm)13(CAE) The Van

This statutory pre-planning application consultation is for the Bedwas Tips Reclamation Scheme, Bedwas.

The proposed development is for the reclamation of, and remediation of the Bedwas Tips, that will require the removal of the existing tips and the deposition of material to the north of them, along with a haul road to provide access to the site.

Cadw has serious concerns about this development, as the current proposals will have a significant direct impact on scheduled monument, MM033 Twyn Cae-Hugh Round Barrow, which will be contrary to section 6.1.24 of Planning Policy Wales and the environmental impact assessment (EIA) has identified that archaeological features, possibly associated with this Round Barrow and others in the surrounding area, are located on Mynydd y Grug Common, but these have not been investigated, contrary to section 6.1.26 of Planning Policy Wales.

It is therefore necessary for the EIA to be completed by carrying out the geophysical survey recommended in section 7.7.5 of the EIA, noting that archaeological evaluation may be required to establish the nature, extent and importance of the archaeological features prior to the submission of any planning application for this development.

An application for scheduled monument consent will also need to be made and, as proposed works to the scheduled monument are a key part of the proposed mitigation measures for the development, this will need to be submitted prior to submission of the planning application so that this important material consideration in the determination of the planning application can be fully considered.

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 the Glamorgan-Gwent Archaeological Trust [www.ggat.org.uk](http://www.ggat.org.uk)

Yours sincerely,

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-11.pdf](#) 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.

