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Chris Lowden
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By email

Eich cyfeirnod
Your reference

Ein cyfeirnod
Our reference

Dyddiad
Date 20 January 2021

Linell uniongyrchol
Direct line 0300 0256007

Ebost
Email: cadwplanning@gov.wales

Dear Chris Lowden,

Statutory Pre-Application - Lateral extension to working area of the quarry and changes to the form of two waste tips. Penrhyn Quarry, Bethesda, Gwynedd

Thank you for your email of 11 December 2021 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. Our assessment of the pre-application is given below.

We have significant concerns about the impact on the designated historic assets listed in our assessment below. 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 the planning process is set out in Annex A.

Assessment

Scheduled Monuments

CN119 Sling Burial Chamber
CN144 Settlement between Cil-Twllan and Tan-y-Garth
CN219 Ty'n Twr
CN263 Hut Circle Settlement at Ffos Coetmor
CN297 Slate Gwaliau at Felin Fawr, Penrhyn
CN374 Moel y Ci Cairn

Registered Historic Landscape

HLW (Gw 10) Ogwen Valley

Mae Gwasanaeth Amgylchedd Hanesyddol Llywodraeth Cymru (Cadw) yn hyrwyddo gwaith cadwraeth ar gyfer amgylchedd hanesyddol Cymru a gwerthfawrogiad ohono.

The Welsh Government Historic Environment Service (Cadw) promotes the conservation and appreciation of Wales's historic environment.

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.
We welcome correspondence in both English and Welsh.



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE



World Heritage Sites

Slate Industry of North Wales (candidate site)

Penrhyn Quarry and Bethesda, and the Ogwen Valley to Port Penryhn

Dinorwic Quarry mountain landscape

This advice is given in response to a statutory pre-planning consultation in regard to two proposed developments at Penrhyn Quarry, Bethesda. The first proposal is for a small lateral extension to the working area of the quarry; whilst the second proposal seeks to amend the provisions of the extant planning permission in so far as it relates to the restoration scheme for the quarry (by increasing the height of two of the quarry tips following a review of tipping requirements) and the duration of extraction operations.

The application areas are inside the boundaries of the Ogwen Valley Registered landscape of outstanding historic interest, inside 3km of the scheduled monument identified above and in the buffer zone of the candidate Slate Industry of North Wales World Heritage Site.

The applications will be accompanied by an environmental impact assessment that includes studies considering the impact of the proposed changes on the settings of the above scheduled monument, following the guidance given in "The Setting of Historic Assets in Wales" (2017); an assessment of the impact of the proposed developments on the registered historic landscape, following the ASIDOHL methodology (2007) and consideration of the impact of the proposals of the Outstanding Universal Values of the World Heritage Site, following the guidance outlined in "Managing Change in World Heritage Sites in Wales" (2017) and "Guidance on Heritage Impact Assessments for Cultural World Heritage Properties" (2011).

The studies have been carried out in accordance with the appropriate guidance and concluded that with the suggested mitigation measures the proposals will not have a significant impact on the designated historic assets. We concur with these conclusions in regard to the operational elements of the proposal but in our opinion the restoration plans can be improved.

The restoration scheme should be heritage led and it is noted that the current plans includes the reinstatement of the public footpath across the area. This should be used to provide access to a number of historic assets that have been identified as being of National importance along its route. The conservation of these assets along with access and appropriate interpretation would greatly increase the public's experience, understanding and appreciation of the historic of the slate industry and would therefore be a significant public benefit at the conclusion of the development. This would be a type of heritage interpretation and conservation project that could be supported by Cadw.

The current restoration scheme proposes to encourage the natural regeneration of the whole quarry area, using methods including seed balling and pocket planting. Whilst normal practice is to restore a quarried landscape to its' original state prior to the industrial process beginning, in this case the quarry is in the buffer zone of the World Heritage Site. The current tips form part of the setting of the World Heritage Site and natural regeneration of the re-profiled slate tips would be out of keeping. It is therefore strongly recommend that when tipping has been completed that the historic

tips should be left unseeded so that they continue to contribute to the setting of the World Heritage Site.

Yours sincerely,

Nichola Davies
Casework Manager

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-10.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.