

ELECTRICITY ACT 1989

**THE MID WALES (POWYS) WIND FARMS PUBLIC
INQUIRY**

The Electricity Generating Stations and Overhead Line
(Inquiries Procedure) (England and Wales) Rules 2007

SESSION 1: SSA C

PROOF OF EVIDENCE: HISTORIC ENVIRONMENT

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On behalf of Powys County Council

September 2013

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1. Qualifications and Experience

- 1.1. My name is Andrew Croft. I am an Associate Director in Atkins Ltd, a firm of multi-disciplinary engineering and environmental consultants. I have been employed by Atkins since 2004.
 - 1.2. I am a professional heritage consultant with a BA in Archaeology and Prehistory and a MA in Landscape Archaeology, both from the University of Sheffield. I have over 18 years experience in archaeology, heritage management and environmental planning. I currently lead the Heritage team in Atkins which includes experts in archaeology, historic buildings and historic landscapes. I am also responsible for the operational management of the Atkins ecology business.
 - 1.3. I have broad experience in the heritage and environmental planning sector. This includes preparation of a large number of Environmental Statements (ES) for schemes across the UK, including for wind energy developments, housing developments, road projects, rail schemes, defence projects and flood alleviation works. This work has been undertaken for a range of private and public sector clients. I am currently preparing substantial elements of the formal ES that will accompany the Hybrid Bill for the UK Government's High Speed Rail (HS2) scheme. I am also responsible for the review of all historic environment inputs to ESs within Atkins.
 - 1.4. I have developed numerous conservation plans, management plans and strategies for heritage sites in the UK including work at the Royal Botanic Gardens, Kew World Heritage Site (WHS), Liverpool WHS, Avebury WHS, Derwent Valley Mills WHS, Saltaire WHS, Durham Castle and Cathedral WHS and Giant's Causeway WHS. I have also prepared conservation plans and studies for archaeological complexes, historic buildings and historic landscapes including work at the Thornborough Henges, Castle Hill (Huddersfield), Fulham Palace, Killhope lead mining complex and the Mottisfont Estate. Clients have included English Heritage, Historic Scotland, Cadw, the National Trust, numerous councils and other charities and organisations. I have also prepared Historic Landscape Characterisation studies, including work utilising the Landmap methodology.
 - 1.5. I have prepared detailed analyses of the setting of important heritage sites to inform their conservation and long-term planning decisions and strategies. This has included work for the Orkney WHS, Belton House and Gardens, and Thornborough Henges. My work for the Royal Botanic Gardens, Kew WHS, Saltaire WHS, Durham WHS and Liverpool WHS also involved extensive analysis of setting and approaches to the management of change within that setting.
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- 1.6. I have served as an expert witness at inquiries in relation to the impact of wind energy schemes, highways and housing developments on the setting, character and fabric of the historic environment.
 - 1.7. Atkins was appointed by Powys County Council (PCC) in February 2013 to provide the council with advice on heritage matters in connection with a number of wind farm proposals and applications within and outside of the TAN8 Strategic Search Areas (SSAs).
 - 1.8. As part of that commission I have provided advice to the Council in relation to the Llandinam Repowering proposals. I recommended to the Council that in light of the revisions to the application the Council should consider withdrawing their heritage objection.
 - 1.9. I am familiar with the landscape and historic environment of Mid-Wales and SSA C. I have visited SSA C and its wider environs on a number of occasions in preparing for the inquiry.
 - 1.10. It may be pertinent for the Inquiry to note that I am a resident of Llanwnnog near Caersws in Mid-Wales. My residence has medium distance views of the existing Llandinam wind farm and would have views of the proposed repowering scheme. I moved to Mid-Wales in early 2011 and purchased my property at that time. I was aware of the broad thrust of proposals to deliver wind energy in Mid-Wales at the time of relocation.
 - 1.11. Other than in relation to my instruction from Powys County Council, I am not an objector, in any capacity, personal or otherwise, to any wind energy scheme before the Inquiry or elsewhere in Powys.
 - 1.12. My evidence provides my professional views on the wind energy proposals in the eastern part of SSA C. My evidence identifies all matters which I consider to be relevant and I have drawn the Inquiry's attention to such matters that could affect perceptions of the validity of my professional views. I believe that the facts stated within my evidence are true and that my professional views are valid.
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2. Scope of Evidence

Overview

- 2.1. As set out in Powys County Council's Statement of Case, my evidence is concerned with the impact on the historic environment of the proposed Llanbadarn Fynydd windfarm and three other proposed windfarms, namely Neuadd-goch Bank, Bryngydfa and Garreg Lwyd, all in the eastern part of SSAC,
- 2.2. My evidence demonstrates that these proposed developments would, if consented, substantially alter the setting of a number of interrelated heritage sites, including nationally important scheduled monuments, as well as adversely affecting the underlying historic landscape character of the area. The affected monuments cannot be addressed and seen in isolation and they form a key component of a cohesive archaeological landscape that contains clear relationships between monuments and readily identifiable relationships with the underlying topography, watercourses, probable movement routes and a wider settled landscape. These visual and experiential relationships are critical aspects of the setting of the monuments and make a substantive contribution to their significance and our understanding of that significance. I will demonstrate that the implementation of the proposed developments would, through adverse changes to the setting of the sites, degrade the significance of the sites and in many cases result in substantial harm to designated sites.

Schemes addressed

- 2.3. Figure 1 in Appendix A outlines the locations of the proposed schemes in the context of SSAC.
 - 2.4. The Llanbadarn Fynydd proposals are for 17 turbines to a blade tip height of 126.5m, with an installed capacity of 51MW, plus a meteorological mast, sub-station and compound, access track and highway works. An Environmental Statement (ES) for the scheme was submitted in 2007 and further Supplementary Environmental Information (SEI) was submitted in July 2008, September 2010, February 2013 and September 2013. This SEI addressed various matters including changes to the highway works and internal access tracks; and cumulative impacts on the historic environment.
 - 2.5. The Neuadd-goch Bank proposals are for 9 wind turbines with a maximum tip height of 126m, they would have an installed capacity of up to 27MW. Associated ancillary development including a substation, anemometer mast, new and upgraded access tracks and temporary construction compound also form part of the proposals. The planning
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application for the scheme was submitted to Powys County Council in January 2012. This was supported by an ES. SEI was submitted to the Council in July 2012. As of the 6th of August 2013, date of submission of this evidence, the application has not been determined.

- 2.6. The Bryngydfa proposals are for 12 wind turbines with a maximum tip height of 126.5m, they would have an installed capacity of between 24MW and 36 MW. The development site covers a total area of 246 hectares (ha) and is divided into 2 areas separated by c. 1.7km. These areas lie either side of the proposed Garreg Lwyd development. Associated ancillary development including two substations, two anemometer masts, new and upgraded access tracks and two temporary construction compounds also form part of the proposals. The planning application for the scheme was submitted to Powys County Council in March 2009. This was supported by an ES. As of the 6th of August 2013, date of submission of this evidence, the application has not been determined.
- 2.7. The Garreg Lwyd proposals are for 23 wind turbines with a maximum tip height of 126.5m, they would have an installed capacity of 46MW. Associated ancillary development including a substations, anemometer masts, car park, new and upgraded access tracks and temporary construction compounds also form part of the proposals. The planning application for the scheme was submitted to Powys County Council in 2008. This was supported by an Environmental Statement. Supplementary Environmental Information was submitted in June 2013. As of the 6th of August 2013, date of submission of this evidence, the application has not been determined

Structure of Evidence

- 2.8. To support consideration of the issues I have structured my evidence as follows:

Section 3.0 Historic Environment Legislative and Planning Policy Context provides an overview of the policy and legislative context for consideration of historic environment issues.

Section 4.0 Setting and the Assessment of Harm provides a concise discussion of the concepts of setting, significance and harm in relation to policy and sets out how I have addressed these matters in considering the proposals.

Section 5.0 Overview of Historic Environment provides a narrative description of the historic and archaeological landscape that lies within and around the eastern portion of SSAC. This draws on evidence from a range of sources and supports the understanding of the potential interrelationships and wider prehistoric and historic context in which the assets are situated.

Section 6.0 Cumulative impacts on key sites concisely describes the main designated sites within and around the eastern portion of SSAC, outlines their significance and assesses the likely impacts on their significance arising from the development of Llanbadarn Fynydd, Neuadd-goch Bank, Bryngydfa and Garreg Lwyd.

Section 7.0 Conclusions sets out my overall conclusions on the proposed schemes and their acceptability in policy terms.

Statements of Common Ground

- 2.9. Statements of Common Ground in relation to the historic environment have been prepared in discussion with the applicants for the Llandinam Repowering scheme.

3. Historic Environment Legislative and Planning Policy Context

3.1. The following briefly examines the Acts, policy and related guidance documents listed below and highlights key aspects of them in relation to the historic environment and its treatment in legislation, policy and associated guidance:

- Ancient Monuments and Archaeological Areas Act 1979
- Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)
- Welsh Office Circular 61/96: Planning and the Historic Environment: Historic Buildings and Conservation Areas, 1996
- Welsh Office Circular 60/96: Planning and the Historic Environment: Archaeology, 1996
- Planning Policy Wales: Edition 5, November 2012
- EN-1 Overarching National Policy Statement (NPS) for Energy, July 2011
- EN-3 National Policy Statement for Renewable Energy Infrastructure, July 2011
- Powys Local Plan, 2010
- Technical Advice Note (TAN) 8: Planning for Renewable Energy (Wales), 2005
- Conservation Principles ,CADW, March 2011
- PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide, English Heritage, DCMS, DCLG, March 2010

Ancient Monuments and Archaeological Areas Act 1979

3.2. The Ancient Monuments and Archaeological Areas Act 1979 (AMAAA) provides the legislative framework for the protection of ancient monuments. Under the terms of the 1979 Act, Welsh Ministers, through Cadw, compile a Schedule of Ancient Monuments. All such monuments are considered to be of national importance.

3.3. Section 61 (7) defines a monument as:

- *“any building, structure or work, whether above or below the surface of the land, and any cave or excavation;*
- *any site comprising the remains of any such building, structure or work or of any cave or excavation; and*

- *any site comprising, or comprising the remains of, any vehicle, vessel, aircraft or other movable structure or part thereof which neither constitutes nor forms part of any work which is a monument within paragraph (a) above;”*

Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)

- 3.4. Buildings identified as being of special architectural or historic interest are given protection in law through the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 1 of the Act requires the Welsh Ministers to draw up and maintain a List of Buildings of Special Architectural or Historic Interest. Assessment of these buildings is undertaken by Cadw.
- 3.5. Buildings are graded as I, II* and II. The vast majority are grade II, with a small percentage listed at grade II* and grade I.
- 3.6. Paragraph 66 (l) states that *“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”*. The emphasis on special regard is of particular note.

Welsh Office Circular 61/96: Planning and the Historic Environment: Historic Buildings and Conservation Areas, 1996

- 3.7. This circular sets out advice on legislation and procedures relating to historic buildings and conservation areas and conveys directions made by the Secretary of State to supplement the Planning (Listed Buildings and Conservation Areas) Act 1990. The Circular, together with Planning Policy Wales, should be taken into account by LPA's in the preparation of Development Plans and may be material to decisions on planning applications and should always be taken into account in the exercise of LB and Conservation Area Controls.
- 3.8. Paragraph 11 of the circular reminds authorities of the requirements of Section 16 and 66 of the 1990 Act to have special regard to desirability of preserving the setting of a listed building. It goes on to state that *“setting is often a desirable part of a buildings character especially if a park, garden or grounds have been laid out to complement its design or function. Also the economic viability as well as the character of historic buildings may suffer and they can be robbed of much of their interest and of the contribution they make to townscape or the countryside if they become isolated from their surroundings, e.g. by new traffic routes, car parks or other development”*.

Welsh Office Circular 60/96: Planning and the Historic Environment: Archaeology, 1996

- 3.9. Circular 60/96 sets out advice on legislation and procedures relating to archaeological remains and supplements Planning Policy Wales and the AMAAA 1979. Paragraph 3 of the circular sets out the importance of Archaeology stating that “*Archaeological remains are a finite, and non-renewable resource, in many cases highly fragile and vulnerable to damage and destruction.... Their importance, as evidence of the past development of our civilisation and as part of our sense of national identity, is not necessarily related to their size or popularity. Some remains are small or barely visible while others form parts of large and complex historic landscapes...*”.
- 3.10. Paragraph 8, in relation to Development Plans, states that “*Development plans should reconcile the need for development with the interests of conservation including archaeology. They should include policies for the protection, enhancement and preservation of sites of archaeological interest and their settings.*”
- 3.11. Paragraph 10, in relation to Planning Applications, states that “*The desirability of preserving an ancient monument and its setting is a material consideration in determining a planning application whether that monument is scheduled or unscheduled.*”
- 3.12. Paragraphs 16 and 17 provide guidance in relation to Planning Decisions. In this context, Paragraph 17 states that “*Where nationally important archaeological remains, whether scheduled or not, and their settings, are affected by proposed development 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 which would have a significant impact on the setting of visible remains.*”

Planning Policy Wales: Edition 5, November 2012

- 3.13. Chapter 6 of Planning Policy Wales provides Welsh Government policy in relation to the conservation of the historic environment. The Welsh Government’s aims in this regard are to:
- “*preserve or enhance the historic environment, recognising its contribution to economic vitality and culture, civic pride and the quality of life, and its importance as a resource for future generations; and specifically to*
 - *protect archaeological remains, which are a finite and non-renewable resource, part of the historical and cultural identity of Wales, and valuable both for their own sake and for their role in education, leisure and the economy, particularly tourism;*
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- *ensure that the character of historic buildings is safeguarded from alterations, extensions or demolition that would compromise a building’s special architectural and historic interest; and to*
- *ensure that conservation areas are protected or enhanced, while at the same time remaining alive and prosperous, avoiding unnecessarily detailed controls over businesses and householders.”*

- 3.14. Chapter 6 restates policy and guidance from Circular 60/96 in relation to the nationally important archaeological remains. In paragraph 6.5.1 it states “*The desirability of preserving an **ancient monument** and its setting is a material consideration in determining a planning application, whether that monument is scheduled or unscheduled. Where nationally important **archaeological remains**, whether scheduled or not, and their settings are likely to be affected by proposed development, there should be a presumption in favour of their physical preservation in situ.*”
- 3.15. It also reinforces policy from Circular 61/96 in relation to the setting of listed buildings. In paragraph 6.5.9 it states “*Where a development proposal affects a **listed building** or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building, or its setting, or any features of special architectural or historic interest which it possesses*”.

EN-1 Overarching National Policy Statement (NPS) for Energy, July 2011

- 3.16. Section 5.8 of EN-1 provides guidance on the treatment of the historic environment in relation to energy infrastructure projects. Guidance in Section 5.8 reflected policy set out in England’s Planning Policy Statement 5: Planning for the Historic Environment. This has been superseded by England’s National Planning Policy Framework (NPPF), although EN-1 makes allowance for successor policy.
- 3.17. EN-1 embeds the concept of significance into the decision making process in relation to the historic environment and takes a broad view of what constitutes the historic environment:
- 5.8.2 The historic environment includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, landscaped and planted or managed flora. Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called “heritage assets”. A heritage asset may be any building, monument, site, place, area or landscape, or any combination of these. The sum of the heritage interests that a heritage asset holds is referred to as its significance.*

- 3.18. EN-1 references PPS5 as the source for definition of terms such as ‘significance’ and ‘setting’. Annex 2 of PPS5 contained the following definitions of these terms:

“SIGNIFICANCE

The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic

SETTING

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”

- 3.19. NPPF, the successor document to PPS5, and hence the relevant document for EN-1, defines ‘setting’ using the same terminology as PPS5. The definition of ‘significance’ is however slightly different:

“Significance (for heritage policy): *The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”*

- 3.20. This definition reinforces the linkage between setting and significance and the contribution that setting can make to the significance of an asset.
- 3.21. EN-1 indicates in paragraph 5.8.3 that significance can be recognised through designation. In paragraph 5.8.4 it indicates that some non-designated assets can be considered to be of equal value to designated assets.
- 3.22. In terms of assessing developments, the guidance in EN-1 states in paragraph 5.8.8 that *“As part of the ES (see Section 4.2) the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset.”*
- 3.23. Paragraph 5.8.12 focuses attention, in terms of decision making, on the significance of affected assets, *“In considering the impact of a proposed development on any heritage assets, the IPC should take into account the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between conservation of that significance and proposals for development”*.
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3.24. Paragraph 5.8.14 sets out the main tests in relation to harm to assets:

“There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II listed buildings; grade I and II* registered parks and gardens; and World Heritage Sites, should be wholly exceptional.”*

3.25. This makes it clear that harm to significance can be a result of physical change to a site or change to its setting. Substantial harm is identified as being a separate issue to loss and should not be solely equated to it.

3.26. Paragraphs 5.8.15 and 5.8.18 establish the principle that harm to the significance of an asset needs to be weighed against the public benefit, and that for developments which affect the setting of assets the same tests apply.

“5.8.15 Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss. Where the application will lead to substantial harm to or total loss of significance of a designated heritage asset the IPC should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm.”

“5.8.18 When considering applications for development affecting the setting of a designated heritage asset, the IPC should treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the IPC should weigh any negative effects against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval”

EN-3 National Policy Statement for Renewable Energy Infrastructure, July 2011

3.27. In relation to onshore wind energy projects EN-3 provides a small number of clarifications on the guidance in EN-1. These relate to public benefit tests and the length of time that onshore wind energy developments are consented for.

3.28. In terms of the public benefit test, paragraph 2.7.29 of EN-3 indicates that when considering schemes reference should be made to paragraphs 2.5.31 to 2.5.36. Of these 2.5.34 is relevant to the historic environment:

“In considering the impact on the historic environment as set out in Section 5.8 of EN-1 and whether it is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the IPC should take into account the positive role that large-scale renewable projects play in the mitigation of climate change,

the delivery of energy security and the urgency of meeting the national targets for renewable energy supply and emissions reductions.”

- 3.29. In relation to the consideration of impacts on the setting of assets, EN-3 states the following in paragraphs 2.7.17 and 2.7.43:

“2.7.17 The time-limited nature of wind farms, where a time limit is sought by an applicant as a condition of consent, is likely to be an important consideration for the IPC when assessing impacts such as landscape and visual effects and potential effects on the settings of heritage assets. Such judgements should include consideration of the period of time sought by the applicants for the generating station to operate and the extent to which the site will return to its original state may also be a relevant consideration.”

“2.7.43 As explained in paragraphs 2.7.13 to 2.7.17 above, onshore wind turbines are generally consented on the basis that they will be time-limited in operation. The IPC should therefore take into account the length of time for which consent is sought when considering any indirect effect on the historic environment, such as effects on the setting of designated heritage assets.”

Powys Unitary Development Plan, 2010

- 3.30. With respect to the historic environment, the plan reflects Planning Policy Wales and Welsh Office Circulars. Policies ENV14 and ENV17 are relevant:

“POLICY ENV 14 - LISTED BUILDINGS

PROPOSALS FOR DEVELOPMENT UNACCEPTABLY ADVERSELY AFFECTING A LISTED BUILDING OR ITS SETTING WILL BE REFUSED. IN CONSIDERING PROPOSALS FOR DEVELOPMENT AFFECTING A LISTED BUILDING AND ITS SETTING, ACCOUNT WILL BE TAKEN OF THE FOLLOWING:

- 1. THE DESIRABILITY OF PRESERVING THE LISTED BUILDING AND ITS SETTING;*
- 2. THE IMPORTANCE OF THE BUILDING, ITS INTRINSIC ARCHITECTURAL AND HISTORIC INTEREST AND RARITY;*
- 3. THE EFFECT OF THE PROPOSALS ON ANY PARTICULAR FEATURES OF THE BUILDING WHICH JUSTIFIED ITS LISTING;*
- 4. THE BUILDING'S CONTRIBUTION TO THE LOCAL SCENE AND ITS ROLE AS PART OF AN ARCHITECTURAL COMPOSITION;*
- 5. THE CONDITION OF THE BUILDING AND THE BENEFIT THAT THE PROPOSALS WOULD HAVE TO ITS STATE OF REPAIR;*
- 6. THE MERITS OF THE PROPOSALS IN SECURING AN APPROPRIATE ALTERNATIVE USE OF THE BUILDING; AND*
- 7. THE NEED FOR PROPOSALS TO BE COMPATIBLE WITH THE CHARACTER OF THE BUILDING AND ITS SURROUNDINGS AND TO BE OF HIGH QUALITY DESIGN, USING MATERIALS IN KEEPING WITH THE EXISTING BUILDING.*

POLICY ENV 17 - ANCIENT MONUMENTS AND ARCHAEOLOGICAL SITES

DEVELOPMENT WHICH WOULD UNACCEPTABLY AFFECT THE SITE OR SETTING OF A SCHEDULED ANCIENT MONUMENT OR OF AN ARCHAEOLOGICAL SITE OF NATIONAL IMPORTANCE WILL NOT BE PERMITTED AND OTHER SITES OF ARCHAEOLOGICAL IMPORTANCE WILL BE SAFEGUARDED WHERE POSSIBLE.”

3.31. Policy E-3 in relation to Wind Power is also relevant:

“POLICY E3 - WIND-POWER

APPLICATIONS FOR WINDFARMS INCLUDING EXTENSIONS TO EXISTING SITES AND INDIVIDUAL WIND TURBINE GENERATORS WILL BE APPROVED

WHERE:

1. THEY DO NOT UNACCEPTABLY ADVERSELY AFFECT THE ENVIRONMENTAL AND LANDSCAPE QUALITY OF POWYS, EITHER ON AN INDIVIDUAL BASIS OR IN COMBINATION WITH OTHER PROPOSED OR EXISTING SIMILAR DEVELOPMENTS. WHERE THE CUMULATIVE IMPACT OF PROPOSALS IN COMBINATION WITH OTHER APPROVED OR EXISTING WINDFARMS WOULD BE SIGNIFICANTLY DETRIMENTAL TO OVERALL ENVIRONMENTAL QUALITY THEY WILL BE REFUSED....

4. THEY DO NOT UNACCEPTABLY IMPACT UPON ANY BUILDINGS OR FEATURES OF CONSERVATION OR ARCHAEOLOGICAL INTEREST....”

Technical Advice Note (TAN) 8: Planning for Renewable Energy (Wales), 2005

- 3.32. TAN8 identifies a number of Strategic Search Areas (SSAs) for onshore wind energy development in Wales. These were allocated capacity levels. For SSA C the capacity levels were established at 70MW, and clarified in the Minister’s letter of July 2011 at 98MW.
- 3.33. The analysis of SSA locations and extents was necessarily high level and limited to consideration of national scale landscape designations. Detailed analysis of Landmap data was not undertaken, neither was there any analysis of concentrations of nationally important heritage sites.
- 3.34. Paragraph 29 of TAN 8 states that “SSAs *display all of the following characteristics. They are:*
- *extensive areas with a good wind resource (typically in excess of 7 metres per second).*
 - *upland areas (typically over 300m above ordnance datum) which contain dominant landform that is flat (plateau) rather than a series of ridges.*
 - *generally sparsely populated.*
 - *dominated by conifer plantation and/or improved/impoverished moorland.*
 - *has a general absence of nature conservation or historic landscape designations.*
 - *of sufficient area to accommodate developments over 25MW, to achieve at least 70MW installed capacity and to meet the target capacity.*
 - *largely unaffected by broadcast transmission, radar, MoD Mid Wales Tactical Training Area (TTA) and other constraints.”*
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3.35. As stated in paragraph 24, “*Not all of the land within the SSAs may be technically, economically and/or environmentally suitable for major wind power proposals; however the boundaries are seen as encompassing sufficient suitable land, in one or more sites, to deliver the Assembly Government’s energy policy aspirations*”. Not all land within the SSA can therefore to automatically be considered as suitable for wind energy development.

Conservation Principles (CADW), March 2011

3.36. The publication “*Conservation Principles for the sustainable management of the historic environment in Wales*” sets out Cadw’s approach to the protection and management of the historic environment as a whole. It was prepared to ensure that Cadw’s actions and decisions are consistent. Cadw encourages other organisations to utilise the principles.

3.37. The six principles are:

- Principle 1 Historic assets will be managed to sustain their values
- Principle 2 Understanding the significance of historic assets is vital
- Principle 3 The historic environment is a shared resource
- Principle 4 Everyone will be able to participate in sustaining the historic environment
- Principle 5 Decisions about change must be reasonable, transparent and consistent
- Principle 6 Documenting and learning from decisions is essential

3.38. The Conservation principles are founded on the concept of Significance and this is defined as “*The sum of the cultural heritage values, often set out in a Statement of Significance.*” Cultural heritage values are “*An aspect of worth or importance, here given by people to historic assets.*” and can be aesthetic, communal, evidential or historic.

3.39. In terms of Setting, the document defines this as “*The surroundings in which an historic asset is experienced, its local context, embracing present and past relationships to the adjacent landscape.*”

3.40. The document provides guidance on how setting can be assessed and indicates that the significance of an asset changes with our changing knowledge.

3.41. Whilst the Conservation Principles is not a development control policy document it does contain some guidance on how to address and consider proposals for change in the context of other interests:

“Integrating conservation with other interests

39 Changes which would harm the heritage values of an historic asset will be unacceptable unless:

- a. the changes are demonstrably necessary either to make that asset sustainable, or to meet an overriding public policy objective or need; and*
- b. there is no reasonably practicable alternative means of doing so without harm; and*
- c. that harm has been reduced to the minimum consistent with achieving the objective; and*
- d. it has been demonstrated that the predicted benefit decisively outweighs the harm to the values of the asset, considering*
 - its comparative significance;*
 - the impact on that significance; and*
 - the benefits to the asset itself and/or the wider community or society as a whole.”*

PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide, English Heritage, DCMS, DCLG, March 2010

- 3.42. Although PPS5 has been superseded the Practice Guide remains in force in relation to NPPF in England, and hence remains of relevance to EN-1 and EN-3.
- 3.43. The guidance addresses a broad range of historic environment issues but makes a number of relevant points in relation to impacts on the significance of assets and their settings.
- 3.44. In relation to substantial harm, the guidance states in Paragraph 91 that *“Where substantial harm to, or total loss of, the asset’s significance is proposed a case can be made on the grounds that it is necessary to allow a proposal that offers substantial public benefits. For the loss to be necessary there will be no other reasonable means of delivering similar public benefits, for example through different design or development of an appropriate alternative site”*. This places an emphasis on ensuring all reasonable alternatives have been explored.
- 3.45. In terms of understanding setting and its contribution to significance the document provides guidance in paragraphs 113 to 117 inc.

“113. Setting is the surroundings in which an asset is experienced. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral.

114. The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration; by spatial associations; and, by our understanding of the historic relationship between places. For example, buildings that are in close proximity but not visible from each other may have a historic or aesthetic

connection that amplifies the experience of the significance of each. They would be considered to be within one another's setting.

115. Setting will, therefore, generally be more extensive than curtilage and its perceived extent may change as an asset and its surroundings evolve or as understanding of the asset improves.

116. The setting of a heritage asset can enhance its significance whether or not it was designed to do so. The formal parkland around a country house and the fortuitously developed multi-period townscape around a medieval church may both contribute to the significance.

117. The contribution that setting makes to the significance does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. Nevertheless, proper evaluation of the effect of change within the setting of a heritage asset will usually need to consider the implications, if any, for public appreciation of its significance."

- 3.46. In relation to assessing the impact of change on the setting and hence significance of assets, the document provides further guidance in paragraphs 118 to 124 inc. The following highlights the relevant material from that guidance:

"118. Change, including development, can sustain, enhance or better reveal the significance of an asset as well as detract from it or leave it unaltered. For the purposes of spatial planning, any development or change capable of affecting the significance of a heritage asset or people's experience of it can be considered as falling within its setting. Where the significance and appreciation of an asset have been compromised by inappropriate changes within its setting in the past it may be possible to enhance the setting by reversing those changes.

119. Understanding the significance of a heritage asset will enable the contribution made by its setting to be understood. This will be the starting point for any proper evaluation of the implications of development affecting setting. The effect on the significance of an asset can then be considered and weighed-up following the principles set out in policies HE 7, 8 and 9 [policies superseded by NPPF]. While this consideration is perhaps most likely to address the addition or removal of a visual intrusion, other factors such as noise or traffic activity and historic relationships may also need to be considered.

120. When assessing any application for development within the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change and the fact that developments that materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

121. The design of a development affecting the setting of a heritage asset may play an important part in determining its impact...

122. A proper assessment of the impact on setting will take into account, and be proportionate to, the significance of the asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it."

- 3.47. This guidance reinforces the need for an appropriate and proportionate level of understanding and assessment to enable a considered view of potential impacts to be taken.

4. Setting and the Assessment of Harm

Concept and definition of setting

- 4.1. Setting has been the subject of considerable debate and discussion over the past 20 or so years. In terms of current approaches to it, it is worth noting the similarity in definitions that are emerging across policy and guidance in Wales and England.
 - 4.2. The definition of setting presented in Cadw's "Conservation Principles" (2011) is as follows:
"The surroundings in which an historic asset is experienced, its local context, embracing present and past relationships to the adjacent landscape."
 - 4.3. The National Planning Policy Framework for England, the terminology of which underpins EN-1, defines setting as:
"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."
 - 4.4. PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide, (March 2010) which still supports NPPF and hence EN-1 further expands on this definition (see paragraph 3.47 above).
 - 4.5. All of these definitions indicate that the setting of a heritage asset must be considered beyond purely visual matters and that the proper exploration of setting needs to encompass a more rounded consideration of how an asset is currently experienced and understood in the landscape and how it has been experienced and understood in that landscape since its creation.
 - 4.6. In this regard, the English Heritage document 'Guidance on the Setting of Heritage Assets', published in 2012, is a useful document as it is founded on the terminology and policy guidance contained in the former PPS5, which was taken forward into the NPPF and also informed EN-1. It is also explicitly mentioned as being forthcoming in *PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide*. The English Heritage setting guidance also draws on English Heritage's 'Conservation Principles', which formed the basis for Cadw's 'Conservation Principles'. The English Heritage guidance also sits within the same legal context as policy in Wales. It is therefore relevant to the Inquiry in terms given its relationship to EN-1 and EN-3 and its status as accepted good practice.
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- 4.7. In terms of assessing potential harm to assets, it is important that the description of an asset's setting enables the contribution of that setting to the significance of the asset to be understood. Significance as a term has been defined by PPS5, NPPF, and the Conservation Principles from Cadw and English Heritage. These definitions are provided above, in Section 3 of my evidence.
- 4.8. In this context, The English Heritage guidance on setting includes a non-exhaustive check-list of potential attributes that may be relevant to understanding the setting of an asset and the contribution that the setting makes to the significance of that asset. This list is provided below for reference:

“The asset’s physical surroundings

- *Topography*
- *Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains)*
- *Definition, scale and ‘grain’ of surrounding streetscape, landscape and spaces*
- *Formal design*
- *Historic materials and surfaces*
- *Land use*
- *Green space, trees and vegetation*
- *Openness, enclosure and boundaries*
- *Functional relationships and communications*
- *History and degree of change over time*
- *Integrity*
- *Issues such as soil chemistry and hydrology*

Experience of the asset

- *Surrounding landscape or townscape character*
- *Views from, towards, through, across and including the asset*
- *Visual dominance, prominence or role as focal point*
- *Intentional inter visibility with other historic and natural features*
- *Noise, vibration and other pollutants or nuisances*
- *Tranquillity, remoteness, ‘wildness’*
- *Sense of enclosure, seclusion, intimacy or privacy*
- *Dynamism and activity*
- *Accessibility, permeability and patterns of movement*
- *Degree of interpretation or promotion to the public*
- *The rarity of comparable survivals of setting*

The asset’s associative attributes

- *Associative relationships between heritage assets*
- *Cultural associations*
- *Celebrated artistic representations*
- *Traditions”*

- 4.9. These broad attributes form a useful basis for considering the setting of designated and non-designated assets and landscapes and understanding how they contribute to the significance of an asset.
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Assessing Impacts and Harm

Defining Harm

- 4.10. EN-1 requires the assessment of a proposal to determine if it would cause “Less than Substantial Harm” or “Substantial Harm” to the significance of an asset or “Total Loss” of an asset’s significance. No definitions of these terms are provided in EN-1, or other related documents including the PPS5 Historic Environment Planning Practice Guide or NPPF. I have therefore set out below, at a high level, my understanding of what three terms relate to:
- 4.11. “Total Loss” is perhaps best understood in terms of demolition or physical removal of an asset. Although for particular assets where setting makes profound contribution to their significance “Total Loss” could be taken to involve the total loss of setting e.g. the enveloping of an asset in a form of development that removes all vestiges of its immediate landscape and severs linkages with other related assets.
- 4.12. “Substantial Harm” is a step down from Total Loss, but is still represents a considerable degree of change to the significance of an asset. This could be as the result of removal of significant elements of fabric or the degradation / removal of key aspects of an asset’s setting that notably contribute to its significance.
- 4.13. “Less than Substantial Harm” could be taken to cover very a broad range of potential harm from very minor impacts through to alterations to quite notable changes to significance, which would certainly require consideration in policy terms. For the purposes of my evidence, I have disregarded negligible, small scale changes and have utilised the term “Less than Substantial Harm” to indicate changes to significance that would be noticeable and appreciable and warrant consideration in policy terms.
- 4.14. It is important to note, however, that policy in Wales and Powys, as set out in Circular 60/96, as well as in Planning Policy Wales and the Powys Local Plan is not based on terminology relating to harm. For impacts on Scheduled Monuments, the policy test is set out in 60/96 as follows: *“Where nationally important archaeological remains, whether scheduled or not, and their settings, are affected by proposed development 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 which would have a significant impact on the setting of visible remains”*.
- 4.15. Here the test relates to ‘Significant Impact’. ‘Significant Impact’ would equate to my use of the term “Less than Substantial Harm” (see 4.13 above) as well as encompassing Substantial Harm and Total Loss.
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4.16. The policy also refers to the “preservation in situ” of assets, that is to say their preservation in their current form. As the policy test also relates to setting it is apparent to me that the intent of the policy is to preserve the setting of designated sites in their current form.

Assessing Impact and Harm

4.17. The process for assessing impact and harm I have used is simple:

- 1) Identify potentially affected assets, describe them and their significance;
- 2) Place assets in their wider context, describe their setting and assess the contribution of their setting to their significance; and
- 3) Assess the change to that setting and harm to significance that would result from the implementation of the four proposed schemes.

4.18. In terms of assessing impacts on the setting of assets and hence on their significance, the checklist provided in the English Heritage guidance on setting indicates that it is important to ensure that a wide range of factors are taken into account. I have therefore looked beyond issues of visibility and taken into account more experiential aspects such as the nature of the change to the landscape context of an asset, changes in approaches to assets, changes to people’s ability to appreciate and understand an asset and changes to the relationship between an asset, its landscape context and other assets.

4.19. As required by EN-3, I have also considered the lifetime of the proposed developments. The proposed developments would have an operational life of c. 25 years. This broadly equates to a generation in human terms. This is a long term impact that will substantially alter the experience of an asset for a continuous period. Given that ‘Setting’ is an experiential concept (see definitions in 4.2 and 4.3 above) this length of time cannot be considered as temporary. Only limited weight can therefore be afforded to the “temporary” nature of the development.

4.20. I present the outcomes of my assessment in Sections 5 and 6 of my evidence. Section 5 provides a broad landscape historical context for the assets, enabling us to understand the potential interrelationships and wider prehistoric and historic context in which the assets are situated. Section 6 identifies the potentially affected assets, describes them, their significance and the contribution that their setting makes to their significance; then assesses the potential harm in relation to the three identified levels of harm: “Total Loss”, “Substantial Harm” and “Less than Substantial Harm”. This is done on an asset-by-asset basis.

5. Overview of Historic Environment

Introduction

- 5.1. The four proposed developments all lie within a complex historic landscape, made up of upland, semi upland and valley sides with evidence of occupation and utilisation from the early prehistoric to modern day. This section provides a brief overview of the nature and development of that historic landscape and the sites and monuments it contains. Figures 2, 5, 6 and 7 plot the locations of designated sites and other assets mentioned in this section and in Section 6.
- 5.2. The material presented in this section has drawn on a range of sources including designated site data from Cadw; the published Environmental Statements (ESs) and Supplementary Environmental Information (SEI) reports for the four schemes; readily available secondary sources; and Landmap data. Site visits have also been made. As well as looking at the application areas and their immediate environs this section also considers the wider landscape to a distance of some 5km and some of the monuments within that wider landscape.

Landscape Description

- 5.3. The development sites lie on the border of Radnorshire and Montgomeryshire in a landscape defined by mountainous ridges and uplands and deep river and stream valleys (see Figures 1 and 4).
- 5.4. Modern and historic human settlement in the area is centred on the two main valleys. To the immediate east lies the valley of River Teme (Afon Tefeidiad). This has a wide shallow valley bottom with comparatively rich agricultural land. It opens out to the south towards Knighton, to the north after Felindre the valley narrows markedly and runs down a deeply cut valley. The valley of the River Ithlon (Afon Ieithlon) forms the western edge of the area. The Ithlon rises between the western end of Kerry Hill and the hill of Glog. At source it is narrow but it soon becomes a substantial feature as it snakes southwards down its valley. There is limited grazing on its narrow floodplain and above lie wooded slopes of the valleys side.
- 5.5. Further afield the pattern of large ranges of hills divided by deep river and stream valleys is repeated until the larger expanse of the Caersws Basin and the River Severn Valley are reached to the north and west and the broader valley of the River Clun and the gentler topography of western Shropshire are reached to the east.

- 5.6. To the north, before the Severn valley is reached, lies the valley of the River Mule which rises on the Glog and Kerry Hill and runs for some way roughly east to west, creating a long used pass between England and Wales.
- 5.7. The upland areas between the main valleys are the focus for the applications. These uplands do not have the height and remoteness of uplands much further to the west and north. They are currently characterised by a combination of open moorland and rough grazing; and enclosed improved pasture with a complex fieldscape of smaller more irregular fields particularly in valleys and on areas of the upper slopes. Unlike other areas of Radnorshire and Powys generally, there is less evidence for Fridd banks and features associated with large-scale upland grazing.
- 5.8. The elevated areas of the landscape are generally open in nature with limited vegetation and modern structures and features. There are occasional blocks of plantation. The area is crossed by a number of small roads, footpaths and tracks.

Landmap Character Areas

- 5.9. The land between the two valleys of the Ithlon and the Teme consists of various landscape types all of which have been analysed and defined in the then Countryside Council for Wales (CCW's) Landmap programme. The Landmap assessment included the definition and examination of historic landscape areas.
- 5.10. Each of the proposed developments lies in one, or more, Landmap Historic Character area. These are briefly defined below and shown on Figure 3. Extracts from the descriptions are also included as these detail the main features within each character area. All the Character Areas are larger than the application areas so some of the individual sites and monuments mentioned lie outside of the application areas.

Neuadd Goch

- 5.11. The northwest part of Neuadd Goch lies within the Kerry Hills Historic Landscape Landmap area (MNTGMHL124), this has been graded as an area of outstanding value and is described, in summary, as follows:

“Predominantly straight-sided fieldscapes representing post-medieval enclosure on the upland ridge of the Kerry Hills along the border with Radnorshire and Shropshire, with large blocks of 20th-century conifer woodland. Early settlement and land use indicated by clusters of Neolithic to Bronze Age burial and ritual monuments. The area is crossed by the early medieval Offa's Dyke boundary and by several other early medieval short dyke systems. Dispersed farms and houses of medieval and post-medieval origin, with some abandoned house sites of medieval and post-medieval date.”

- 5.12. The south east part of the development area largely lies within Kerry Ridgeway Landscape Area (RDNRHL121). This has been graded as an area of high value and is described, in summary, as follows:

“Unenclosed upland commons with a proportion of large straight-sided encroachments and small areas of post-war conifer plantation. Hilltop prehistoric burial monuments and scattered evidence of medieval and post-medieval settlement and land use.”

Llanbadarn Fynnydd

- 5.13. The southern part of Llanbadarn Fynnydd lies within the Upper Ithlon Landmap Area (RDNRHL613), an area of high value, this is described as follows:

“Extensive, irregular fieldscape encompassing the tributaries of the upper Ithon valley. Mixed, medium-sized fields, predominantly enclosed by hedged boundaries, including irregular field patterns of medieval and early post-medieval origin together with areas of more regular, straight-sided fields probably representing 19th-century enclosure of former commons. Isolated residual areas of common land. Earlier prehistoric activity suggested by scattered chance finds. Medieval settlement and land use denoted by small nucleated, valley-bottom, medieval church settlements at Llanbadarn Fynnydd, Llananno and Llanbister, masonry castle occupying site of later prehistoric hillfort at Castellinboeth, and by dispersed abandoned house platforms and existing farmsteads. Isolated areas of abandoned ridge and furrow cultivation on the margins of the uplands. Dispersed farmsteads, former watermills and small stone quarries of post-medieval date.”

- 5.14. The northern part of the site lies within the very extensive Pen Ithlon historic landscape area (RDNRHL997), this is of moderate value and described as follows:

“Predominantly enclosed 19th-century upland common around the headwaters of the river Ithon. Mostly large, straight-sided fields defined by either hedges or post-and-wire fences. Later prehistoric activity indicated by numerous flint scatters and dispersed burial mounds. Medieval and post-medieval settlement and land use represented by house platforms, pillow mounds and small stone quarries. Dispersed farms largely of 19th-century origin. Small areas of modern forestry and planted shelter belts.”

Garreg Lwyd,

- 5.15. Garreg Lwyd, lies entirely within the very extensive Pen Ithlon historic landscape area (RDNRHL997), this is of moderate value and is described above.

Bryngydfa

- 5.16. Bryngydfa is in two detached parts and lies within two Landmap areas. The northern part lies within Pen Ithlon historic landscape area (RDNRHL997), this is described above. The eastern edge is in Upper Teme historic landscape area (RDNRHL806), an area of high value that is described as follows:

“Fieldscape of small and medium-sized irregular fields along the dissected valley sides and valley bottom of the upper Teme valley and its tributaries to the north-west of Knighton. Fields largely with hedged boundaries. Relict ancient broadleaved woodland along watercourses and on valley sides. Small nucleated church settlement at Beguildy, associated with earthwork castle. Other small nucleated settlements of medieval or post-

medieval date at Lloyney and Knucklas. Isolated areas of strip fields and relict ridge and furrow of probable medieval wyd. date. Small stone quarries and former corn watermills of post-medieval date. The Central Wales railway line runs along the southern edge of the area, crossing the Ffrwdwen Brook by way of the Knucklas viaduct.”

Landscape Development and Evidence

Prehistoric

- 5.17. Each character area has evidence of Prehistoric use or occupation, including flint scatters, settlement sites, barrows and funerary monuments. The most notable surviving prehistoric monuments are the many barrows, many of which crown prominent hills or occupy distinctive topographical locations along watersheds, ridgelines or at the heads of passes. These monuments were designed to be visible in the landscape and to occupy key locations relating to water and, probably, movement. They often made use of local topographic features to accent their presence in the landscape and draw attention to them. The natural features they utilise and, in some cases, adjacent natural mounds would have had their own significance and meaning to prehistoric communities, our modern conceptions of the division of “natural” and “human made” are unlikely to have been recognised in the Bronze Age.
 - 5.18. In most cases, the barrows remain as visible monuments with a visual presence in the landscape. Views from, and to, these monuments as well as views of the natural formations on which they were situated are contributing factors to their setting and significance. Additionally, approaches to them and across the landscape are also of significance to understanding their role in the landscape and prehistory. The generally open, uncluttered landscape in which they sit enables us to appreciate and understand the monuments and the connections between them and the underlying physical landform.
 - 5.19. The historic landscape of the Kerry Hills has a notable number of such prehistoric monuments. This landscape stretches down into the area and a number of concentrations of monuments border or lie within the development sites. These include the Glog complex (MG121, MG122 plus ND1 and ND2) above Dolfor (See Figures 2 and 5). This complex of prehistoric remains occupies a highly distinctive landscape location and utilises local topography to highlight and increase the visibility and presence of the barrows. In terms of understanding the relationship between prehistoric people and their world it is important to recognise that the landform of the Glog as a whole probably had as much meaning and significance to these people as the individual monuments upon it.
 - 5.20. The complex also occupies a location at the watershed of the river Ithlon, the river Mule and the Cwmrhiwdre Brook. Like the Glog, the Two Tumps barrows (MG048) occupy a prominent location within the Kerry Hills historic landscape area (see Figures 2 and 5).
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These two barrows are excellent examples of type, in terms of their visible form, landscape setting and wider relationships.

- 5.21. The Kerry Ridgeway has also been long identified as a particularly ancient routeway and is lined with barrows and other monuments. The ridgeway remained as an important trade route well into the 19th century, as such it represents a long running continuation of use, of an early landscape feature.
 - 5.22. Moving south from the Glog and into the Pen Ithlon Historic Landscape Area there are a series of interconnected surviving groups of prehistoric barrows, mainly scheduled, occupying the ridgelines and sitting above the watersheds. These include a linear arrangement of prehistoric monuments starting around Cider House Farm (ND4 and MG109) and stretching southwards along the high ground at Banc Gorddwr (RD250, RD251, ND5-8 inc.) (see Figures 2 and 6). This group terminates at the south end in a defined cluster of three barrows (RD084) (see Figure 6). This grouping exploits the undulating ridgeline and was probably, at least in part, developed to respond to movement routes through the wider landscape. The triple cluster at the southern end is a notable and important complex. It is also of interest that potential settlement activity has been identified within the area of this group (ND3). This may indicate that these monuments were experienced on a daily basis rather than being a rarefied and separate “sacred” landscape.
 - 5.23. Beyond this group, but still within the Pen Ithlon Historic Landscape Area, there is a further related linear arrangement of prehistoric barrows running from the hill at Bryngydfa southwards along high ground to Warren Hill (ND9, ND10, ND11, RD103, RD252, RD104, ND12, RD105 - see Figures 6 and 7). Once again these occupy a ridgeline location and exploit local spurs, cols and summits to accent visibility of the monuments. The Cae Glas group (RD104 and ND12) occupies an interesting pass head location, perhaps relating to prehistoric movement routes and / or watershed relationships. The scheduled barrow at Warren Hill (RD105) is a classic hilltop barrow with commanding views in all directions. The other scheduled (RD103 and RD252) and non-designated barrows in this group (ND9, ND10 and ND11) occupy ridgeline or spur locations. Within this area there is also evidence of prehistoric activity in the form of artefact scatters, possible settlement sites (ND12) and a possible standing stone (ND13). These other remains and finds indicate that the area was a focal point for activity in the wider landscape.
 - 5.24. Further south, away from the development, can be found the remarkable barrows of Beacon Hill (RD111). This group occupy one of the highest peaks in the wider area and were clearly located to be seen from, and to provide a commanding presence over, the surrounding extensive landscape. Similar versions of this form of elevated placement can be seen at the hills of Gors Lydon (RD106).
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5.25. Whilst the majority of the known prehistoric monuments in the area around and within the proposed development sites are Bronze Age in date, there are other sites in the landscape that are probably Iron Age in date. These include the Castell-y-bliadd (RD102), a scheduled Iron Age defended enclosure close to the proposed developments at Garreg Llywd and Bryngydfa and also close to complexes of earlier prehistoric monuments (see above). The presence of this monument may indicate continued exploitation and occupation of the area through the Iron Age and onwards. Castelltinboeth (RD038), a Medieval castle, also sits on the site of an earlier Iron Age fort, further attesting to the importance and profile of the area in this period.

Early Medieval and Medieval Periods

- 5.26. Early medieval landscape features survive in the wider landscape. Perhaps the most notable features are the numerous cross dykes and boundaries which are found throughout the region. The most important of these, of course, is Offa's Dyke which runs through the Kerry Ridgeway Landscape Area and runs parallel with the range of hills which make up the application area. Three shorter medieval cross dykes have been identified in the vicinity of the development sites (MG062 and MG063 – two parts); including one that crosses the Glog (see Figures 2 and 5). Whilst these features are generally assigned Early Medieval dates they may in fact be earlier, perhaps dating from the Bronze Age or Iron Age with later re-use and adaptation.
- 5.27. Early medieval settlement patterns are difficult to define in this area of Wales. It is likely that some of the locations inhabited today have early medieval origins. The settlement near Castell-y-bliadd (RD155) may have its origins in the period. If it does, then it would provide exceptional evidence of occupation of the upland fringe in this time.
- 5.28. Later Medieval activity is well represented in the archaeological record and historic landscape. The Landmap character areas all contain evidence of medieval and post settlement, with accompanying boundaries and fields, house platforms and buildings, pillow mounds for rabbit farming, and quarries.
- 5.29. The wider area is particularly rich in medieval and early post medieval domestic architecture. This includes important late medieval hall houses in Beguildy parish and a number of early post medieval houses (both listed and unlisted) on the slopes of the Kerry Ridgeway and in Dolfor parish.
- 5.30. Perhaps more significantly, the wider area also contains a number of substantial and important medieval sites. These include Castelltinboeth (RD038), a prominent and strategically placed medieval castle site overlooking the River Ithon valley and providing a defensive role in this strategic river corridor. The location of the castle was deliberately
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chosen to control the river valley but also to provide a dominant visual reminder of the power and prestige of the builder and occupier.

Post Medieval

- 5.31. Post medieval activity is present throughout the area. The current fieldscape across the development sites and wider landscape was probably largely established during the 19th century enclosure of major parts of the Upper Ithlon and Pen Ithlon character areas. These more recent periods are also largely responsible for the core of the building stock and forestry plantations throughout the area. A number of listed post medieval buildings lie within the landscape in and around the proposed development sites (see Figure 2)

Landscape Analysis

- 5.32. The landscape over which the four proposed developments would stretch is complex and has clearly developed and been inhabited over a very extensive period of time. The time depth of this landscape is noticeable and of value. Unlike many of the remote uplands in Powys which also contain prehistoric complexes the local landscape here has been occupied and utilised in an intensive manner since at least the Bronze Age. These prehistoric monuments would have been utilised for millennia after their construction to inform and create local mythology, belief and stories – as well serving as visual landmarks, way finders, territorial markers and perhaps for further burial practices. Their significance lies not only in their Bronze Age origins, but also in their life story as part of an evolved and inhabited landscape containing millennia of evidence for human activity.
- 5.33. This underlying prehistoric landscape of features, both manmade and natural, does not have a static history but is instead a treasury of many stories, decisions, beliefs and approaches to the past, present and future. Every element of such a landscape has a relationship with every other. Before the common use of the written word as a means to transmit and preserve the past, landscapes belonged to a living tradition passed down through generations within communities.
- 5.34. The landscapes under consideration here exist in their present form because the communities who have inhabited them over millennia have chosen to retain them because they have value and meaning to them. Earthworks and monuments have a near permanent presence within these landscapes and form an important element of their significance and value. The survival of these remains in an open landscape such as this enables modern people to engage with, experience and understand the activity and life stories of ancient communities, including those that built the monuments and those that have inhabited the landscape since that time. We can still experience and read this embedded early

prehistoric landscape and the later prehistoric, medieval and post medieval interactions with it.

Conclusions and summary

- 5.35. The above demonstrates that the four proposed windfarms are situated within, and form notable elements of, a wider multi-period historic landscape that contains evidence of human occupation from early prehistory onwards. This has been recognised by the extensive Landmap analysis of the area and, to differing degrees, by the Environmental Statements for the proposed schemes.
- 5.36. Within this wider landscape context, the known early prehistoric remains, which are mainly Bronze Age in date, form an archaeological landscape with clear relationships between monuments and readily identifiable relationships with the underlying topography, watercourses, probable movement routes and a wider inhabited landscape. The survival of probable settlement sites within the landscape adds to its interest.
- 5.37. As well as this early prehistoric landscape, there are later important Iron Age remains and a number of notable and important early medieval sites including the Castell-y-bliadd settlement and scheduled Cross-dykes in this landscape. These are often prominent and notable features with a high degree of archaeological and historic interest.
- 5.38. Key individual designated sites within the landscape under consideration include:
- A cluster of scheduled prehistoric barrows on the 'Glog', a highly distinctive landscape feature lying south west of Dolfor;
 - A linear grouping of c. 6 scheduled prehistoric monuments stretching southwards along the high ground at Banc Gorddwr and terminating at the south end in a defined cluster of three monuments;
 - A further related linear arrangement of prehistoric barrows running from Bryngydfa southwards along high ground to Warren Hill;
 - Numerous other scheduled barrows and prehistoric sites in the landscape around the proposed development sites including Two Tumps, Beacon Hill, Gors Lydan and Moelfre;
 - Castell-y-bliadd, a scheduled Iron Age defended enclosure;
 - A series of three probably early Medieval scheduled cross dykes on the 'Glog', at Two Tumps and further south;
 - A scheduled medieval upland settlement near to Castell-y-bliadd; and
 - Castelltinboeth, a scheduled medieval castle.
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- 5.39. To date there has been little degradation of the setting of these designated sites and the character and integrity of the historic landscape in and around the development sites. The underlying prehistoric and medieval landscape is still readily evident and can be easily appreciated and understood.
- 5.40. Section 6 of my evidence examines these assets, exploring their significance, setting and the potential impacts of the proposed developments.

6. Cumulative impacts on key sites

- 6.1. The following outlines the nature and significance of the identified sites within and around the four proposed Windfarm developments. It describes their setting and sets out the contribution that their setting makes to their significance. It then describes the likely nature and extent of the impact on their setting that would result from the operation of the proposed windfarms.
- 6.2. The sites are broadly grouped by geography and period, beginning with the main concentrations of prehistoric archaeological remains. The locations of these sites are shown on Figures 2, 5, 6 and 7.
- 6.3. Many of the assets discussed are prehistoric barrows. To reduce repetition below, I have summarised the key aspects of the significance of this monuments type here, as follows.
- 6.4. The significance of prehistoric barrows resides in a range of interests. They provide evidence of prehistoric belief systems, approaches to life and death and relationships with landscape and the natural world. They also contain physical archaeological evidence of human activity and their situation within the landscape and relationship to the landscape provides further evidence of prehistoric life. They have an aesthetic role in the landscape as a result of their physical visual presence and relationship to the landforms they occupy. These factors apply to most upstanding barrows.

Scheduled prehistoric barrows on the ‘Glog’

- 6.5. Overlooking Dolfor and the River Ithen valley is the highly distinctive landform of the Glog. This steep sided and prominent ridge with its unusual undulating landform dominates the local area and has attracted human interest from at least the Bronze Age. The Glog contains 12 scheduled barrows (MG121 and MG122) spread along the ridge with a notable cluster at the eastern end, close to the later scheduled cross dyke (MG062) (see Figures 2 and 5). There are also a further non-designated barrows on the ridge (ND1 and ND2).
- 6.6. These monuments form a cohesive and highly distinctive group that represents a concentration of prehistoric activity. They display the range of values set out in paragraph 6.4 above. Their significance has been recognised by their scheduled status, indicating that they are of National Importance. The non-designated barrows are of lesser value, but they do provide further evidence of the scale of prehistoric activity on the Glog and contribute to the group value of the complex.
- 6.7. Their setting is critical part of their significance. Their location was deliberately chosen with the topography of the Glog reinforcing and highlighting the visual presence of the

monuments in the landscape. These monuments were located to be seen and their presence imbued the Glog landscape with additional meaning and value. The prominence of the Glog also means that the monuments on it, and land around them, benefits from extensive views in all directions. These views enable the visual interactions between the monuments and wider topography to be readily understood and experienced. The visual and topographical aspect of their setting is vital to the significance of the monuments on the Glog.

- 6.8. Currently, their visual setting is largely open and rural in nature, with some localized planting blocks. There are clear visual relationships with other monuments and the topography they occupy. Distant views to the existing Llandinam windfarm are read and experienced as such i.e. as distant and separate. The existing windfarm does not particularly degrade the setting of the Glog complex.
 - 6.9. The development of the Neuadd-goch Bank windfarm would significantly alter the setting of the monuments on the Glog. Its proximity and size would change the visual character of the Glog's setting, dominating views out of the complex, reducing the legibility of relationships with related monuments to the southeast, including three scheduled barrows adjacent to and within the windfarm itself (MG109, RD250, RD251) and challenging the Glog's visual presence in the landscape. It must be understood that the Glog is a landscape feature adopted and utilised by our prehistoric ancestors and its visual prominence is a key aspect of the setting of the monuments they left behind. On its own, Neuadd-goch Bank adversely affects the setting of the complex resulting in substantial harm to the significance of this nationally important complex of monuments.
 - 6.10. This harm would be further exacerbated by the development of Llanbadarn Fynydd, which would feature very strongly in views south from the monuments and feature in views of the Glog from the south. This would further challenge the visual prominence of the Glog in the landscape which would degrade the setting of the monuments and harm their significance.
 - 6.11. Development of Bryngydfa and Garreg Lwyd would again further alter the wider visual setting of the Glog, crowding relationships with scheduled assets to the southeast e.g. scheduled barrows at Warren Hill (RD105), Cae Glas (RD104) and further north (RD252 and RD103); in effect creating a very extensive landscape of windfarms to the south and southeast of the Glog, which would probably be read as one continuous whole. These windfarms would also disrupt views of the Glog from the ridgelines running from Warren Hill to Bryngydfa, and along Banc Gorddw. As set out in Section 5, these ridgelines are home to a number of related scheduled prehistoric remains. The presence of Bryngydfa and Garreg Lwyd would further degrade key aspects of the complex's setting, resulting in further harm to its significance.
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- 6.12. Cumulatively, the proposed windfarms would fundamentally alter the setting of this complex, transforming the experience of it in the landscape and affecting how it is understood and how it relates to other nationally important remains. The scale of change and the importance of the setting of the monuments to their significance, means that the schemes would cumulatively result in Substantial Harm to the significance of this important concentration of prehistoric monuments.

A linear grouping of scheduled prehistoric monuments along the high ground at Banc Gorddwr

- 6.13. This linear group comprises six scheduled barrows (MG109, RD250, RD251 and RD084), five non-designated barrows (ND4, ND5, ND6, ND7 and ND8) and associated remains (e.g. ND3) (see Figure 5). It runs southwards from scheduled and non-designated barrows near Cider House Farm (ND4 and MG109), across Banc Gorddwr with its two scheduled barrows (RD250 and RD251) and four non-designated barrows (ND5, ND6, ND7 and ND8), terminating at a cluster of three barrows by the cross roads (RD084). The significance of many of these monuments has been recognised by their scheduled status, indicating that they are of national importance. The non-designated assets are of lesser value but provide evidence of the intensity of prehistoric activity in the area and contribute to the group value of the assets. As with other barrows their significance resides in a range of interests, these are set out in paragraph 6.4.
- 6.14. In terms of their setting, the monuments generally lie in open land in largely exposed locations with expansive views in most directions. The sites are situated in a mixture of upland grazing and improved grasslands. There are small pockets of modern woodland near the northern and southern ends of the group. The visual expansiveness of their situation enables visual relationships between these assets and other similar assets and the wider landform to be understood. In this context, the two scheduled barrows on Banc Gorddwr (RD250 and RD251) have a strong visual and historical relationship with the scheduled barrows at Two Tumps (MG048) and the Glog (MG121 and MG122).
- 6.15. The cluster of three barrows at the southern end of this group (RD084) is particularly notable both for the clustering and for their location occupying a subtly prominent hilltop location on the broad Banc Gorddwr ridge. All of the monuments were situated along the ridge and designed to be seen and experienced within that context. The ridge formation is also notable given that the ridge is used as a routeway now and probably served a similar function in the Bronze Age given the ease of movement that upland ridges afford. The relationship between movement routes and the assets is an interesting element of their setting and significance, indicating that they were probably not sited and experienced as wholly remote assets, but rather as accessible monuments within an utilised landscape.
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Evidence for potential prehistoric settlement near Cider House Farm (ND3) further indicates that the barrows may have been situated within inhabited and exploited land and spaces.

- 6.16. The current setting of the assets substantially contributes to their significance, the relationships with the landform and wider landscape, along with visual relationships to other assets and the landforms they occupy is central to how these monuments are understood and the evidence they provide. The relationship with movement routes is also an aspect of setting that contributes to their significance.
- 6.17. The northern scheduled monuments (MG109, RD250 and RD251) and non-designated barrows (ND5, ND6, ND7 and ND8) lie within or adjacent to the boundary of Neuadd-goch Bank, whilst the triple cluster at the southern end lies (RD084) adjacent to Neuadd-goch Bank and Llanbadarn Fynydd and close to Bryngydfa and Garreg Lwyd. The currently largely open, rural setting of the monuments will be transformed by the development of the proposed windfarms and their immediate landscape will be dominated by wind turbines. The barrows within the Neuadd-goch Bank windfarm (MG109, RD250, RD251, ND5-8 inc.) will feel as if they are essentially situated underneath turbines. Views from and to the monuments will be dominated by the turbines from four developments. At the southern end the broad sweep of views from the triple cluster (RD084) and its prominent location on the ridgeline will be challenged and degraded by the presence of c. 39 turbines within 3km, many of which would be less than 1.5km away. The visual presence of the monuments in the landscape would be diminished and interrelationships compromised. The current largely rural experience of the assets would be altered and noise impacts would occur. The experience and nature of the movement corridor along the ridge would also be substantially altered.
- 6.18. Overall, the four proposed developments would fundamentally transform the experience of the assets and their settings. These changes would degrade the setting and adversely affect the significance of the assets. The scale of change and sheer dominance of the proposals would result in substantial harm to the significance of the assets.

A linear arrangement of prehistoric barrows running from Bryngydfa to Warren Hill

- 6.19. This group occupies an undulating ridge running from Bryngydfa southwards to Warren Hill. It essentially has three components: A cluster of non-designated barrows around Bryngydfa (ND9, ND10 and ND11) (see Figure 6); two further scheduled barrows on the ridge, including the Coventry Barrow (RD103) and nearby barrow (RD252) (see Figures 6 and 7); and the scheduled Cae Glas and Warren Hill Barrows (RD104 and RD105) at the southern end (see Figure 7). As with other barrows their significance resides in a range of interests,

these are set out in paragraph 6.4. Within this area there is also evidence of prehistoric activity in the form of artefact scatters, possible settlement sites (ND12) and a possible standing stone (ND13).

- 6.20. The significance of the scheduled monuments has been recognised by their status, indicating that they are of national importance. The non-designated assets have not been scheduled and are consequently of lesser value. Although they are not designated they do provide evidence of the intensity of prehistoric activity along this ridge and therefore contribute to the group value of the assets along the ridge and enable us to better understand the nature and form of prehistoric occupation and utilisation of the area.
 - 6.21. In terms of the setting of the non-designated barrows around Bryngydfa (ND9, ND10 and ND11), Coventry Barrow (RD103) and nearby barrow (RD252), they currently have largely open settings with clear broad vistas in most directions and visual connections to other barrows, and the topography they occupy, in the wider landscape. Their ridgeline location was chosen to facilitate visibility of the monuments as well as providing them with the platform for extensive views. The use of ridgelines as movement corridors would have probably also influenced their siting.
 - 6.22. The Cae Glas group includes two scheduled barrows (RD140) and a number of non-designated sites (ND14), some of which may be natural mounds. In terms of their setting, their location at the head of a pass is very notable. As well as accenting their visual prominence and legibility in the landscape, the location may also relate to the relationship between barrows, and other prehistoric sites and movement routes through the landscape. Approaches to and from these monuments are therefore form a notable element of their setting. The Cae Glas monuments have generally wide ranging views of the area although these are disrupted by local vegetation and local topography.
 - 6.23. In contrast the Warren Hill Barrow (RD105) with its isolated hilltop location has commanding 360 degree views. It is an excellent example of a hilltop barrow, located for visual prominence. The visibility of the barrow relies not just upon the upstanding monument but also on the presence of the hill.
 - 6.24. For all monuments, current longer distance views to the west / northwest feature the existing Llandinam windfarm. The intervening distance and its situation on a separate topographical unit mean that the development does not overly affect the setting of the barrows. The majority of their current visual setting is rural in character without substantial modern infrastructure visible.
 - 6.25. The current setting of the assets substantially contributes to their significance, the relationships with the landform and wider landscape, along with visual relationships to other assets and the landforms they occupy is central to how these monuments are understood
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and the evidence they provide. The relationship with movement routes is also an aspect of setting that contributes to their significance.

- 6.26. The development of Garreg Lwyd and Bryngydfa, in particular, would very substantially alter the settings of the scheduled monuments with a large number of turbines dominating views to and from the monuments and affecting approaches to them. There would also be increases in noise levels at most monuments due to the operation of the turbines, these changes would affect the current rural character of the monuments altering our perceptions of them.
- 6.27. The visual impact of the proposed developments on views from the Cae Glas and Warren Hill monuments (RD104 and RD105) stretching in an arc from roughly a south-southeasterly directly round to a north-northwesterly direction would be further extended to the west by the development of Llanbadarn Fynydd. This extension of visual impact would also apply to the other scheduled barrows (RD103 and RD252) in the group. Neuadd-goch Bank would site behind the other windfarms and would further intensify the visual prominence of the turbines, increasing the disruption of relationships between monuments and views along the interconnecting ridgeline.
- 6.28. In combination, the proposed developments would fundamentally change and degrade the visual and experiential setting of these monuments. They would disrupt key relationships, affect the rural character of monuments' setting, lessen the visual prominence of the monuments and the topographic forms they occupy and essentially transform their current situation and our experience of it. Given the proximity, scale and extent of the proposed developments and the adverse impacts they would have, I conclude that the proposed developments would result in Substantial Harm to the significance of the affected monuments.

Other scheduled barrows and prehistoric remains in the landscape around the proposed development sites

- 6.29. There are a large number of designated monuments within 5km of the four proposed development sites (see Figure 2). The following describes a number of these assets for the purposes of providing a sample of the likely scale of impacts. Not every site is described and assessed.

Gors Lydan Barrows (RD 106)

- 6.30. Two barrows lying c. 60m apart on highest point of Gors Lydan to the south of the proposed developments. Both barrows have a visible surface expression. As with other barrows their significance resides in a range of interests, these are set out in paragraph 6.4.
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The significance of the monuments has been recognised by their scheduled status, indicating that they are of national importance.

- 6.31. Their location on the summit of one of the higher peaks in the landscape ensures that they have commanding 360° views and that views of them and the topographic location they occupy would have been possible from a wide portion of the landscape. The visual prominence of the topography and barrows is therefore important to their significance as are the visual relationships between these barrows and other groups in the area.
- 6.32. Current longer distance views to the west / northwest feature the existing Llandinam Windfarm. The intervening distance and its situation on a separate topographical unit means that the development does not overly effect the setting of the barrows. The majority of their current visual setting is rural and open in character without substantial modern infrastructure visible.
- 6.33. The proposed developments at Llanbadarn Fynydd, Garreg Lwyd and Bryngydfa would be highly visible in a wide span of views from the monuments, stretching anti-clockwise from the northeast round to northwest. The closest proposed turbines would be c. 3km from the monuments and would be highly prominent and visible. They would disrupt visual relationships between the barrows and associated groups to the north and would substantially change the existing rural character of their setting. This would adversely affect their significance, degrading important relationships and affecting our ability to appreciate and understand the monuments. The developments would also challenge, to a degree, the visual prominence of Gors Lydan and the barrows.
- 6.34. Although the visual impact would be quite extensive and a number of visual relationships would be degraded, the impact on significance is less than for example that on Warren Hill (RD105) which sits closer to the developments. The question is whether the degree of harm is 'substantial' or 'less than substantial'. Gors Lydan is a borderline case, however the impact on views from the monument towards the related barrows running from Bryngydfa to Warren Hill and the overall arc of views affected leads me to conclude that Substantial Harm would occur as a result of the degradation of the monument's setting.

Two Tumps (MG048)

- 6.35. As the name suggests, Two Tumps comprises a pair of barrows (see Figures 2 and 5). Both barrows have a visible surface expression. Excavations in the early 20th century revealed a cinerary urn, worked flints, an inhumation and three cremation burials.
- 6.36. The barrows are situated on a broad and prominent ridgeline that demarks the boundary between the upland Llanbadarn Fynydd landscape and the valley floor of the River Severn. The barrows lie on very open and exposed ground used primarily for upland grazing. Their

current setting is open, expansive and rural in nature. The barrows have very wide open views in all directions and were clearly sited to gain access to such views and to occupy this edge land location between two major topographic areas. Their location also ensures that they can be readily seen from the wider landscape and were deliberately sited in this regard. There are clear visual relationships between them and other identified barrows in the landscape and the topographical forms which those barrows occupy. Key relationships in this regard include views across to the Glog, and then southwards along Banc Gorddwr and down to Warren Hill and Beacon Hill in the distance. These expansive, uncluttered views are a characteristic feature of the monuments.

- 6.37. The presence of Llandinam Windfarm in westerly views is not a substantial detractor as the Windfarm is c. 8km distance and clearly situated on a separate topographical unit.
- 6.38. Neuadd-goch Bank, Garreg Lwyd, Bryngydfa, and Llanbadarn Fynydd would all feature very prominently in the extensive views from the barrows. Neuadd-goch Bank is the closest and its visual presence is readily demonstrated by the wireframes and photomontages presented in the Environmental Statement for Neuadd-goch Bank. Llanbadarn Fynydd's visual intrusion is also clear from the photomontages for viewpoint 9 contained in the Environmental Statement and Supplementary Environmental Information. The combination of Neuadd-goch Bank and Llanbadarn Fynydd would be very notable from this location and would substantially degrade the open rural character of the setting of these monuments, affecting their visual context and visual relationships to other monuments and features in the wider landscape.
- 6.39. The Bryngydfa and Garreg Lwyd developments would appear also appear prominently in views, stretching the visual influence of the windfarms round in a broad arc from roughly the west to southeast. This change would affect visual relationships between these barrows and other assets to the south.
- 6.40. Together the proposed windfarms would very significantly alter the setting of these scheduled monuments and would disrupt the relationship that they share with other prehistoric features and associated landforms in the area. These aspects are important elements of the significance of the monuments and the scale of change is such that the developments would result in Substantial Harm to the monuments.

Bryn Cwmrhiwdre Mound (MG280)

- 6.41. Two the west of the Glog in an undulating landscape lies the locally prominent Bryn Cwmrhiwdre hill, on which lies one scheduled barrow (MG280) and one non-designated barrow (ND15) (see Figure 5). As with other barrows their significance resides in a range of interests, these are set out in paragraph 6.4. The significance of the scheduled

monument has been recognised by its status, indicating that it is of national importance.

The non-designated barrow has not been scheduled and is of lesser value. It does however provide further evidence of prehistoric activity in the area.

- 6.42. The scheduled barrow is well defined mound on a natural knoll at the edge of a boggy area. As with other examples in the region, the monument makes use of local topography to reinforce its location in the landscape. It also occupies a location above local watercourses. The monument and its environs have extensive views across the wider landscape, including a clear visual relationship to the Glog with its complex of scheduled barrows and southeast towards the proposed location for Llanbadarn Fynydd. The siting of the monument in this location was a deliberate act, designed to respond to the local and wider topography.
- 6.43. The views from the monument would substantially altered by the addition of turbines at the Neuadd-goch Bank and Llanbadarn Fynydd developments, which would see the nearest turbine lying just over 1km from the monuments and other lying between 2km and 3km distance. Views of the monuments from the adjacent road would also be affected. The turbines would be very prominent and would degrade the rural character of the monument as well as affecting its visual relationships with the wider landscape. Additionally, the Neuadd-goch Bank development would challenge the visual prominence of views of the Glog.
- 6.44. The proximity of the Neuadd-goch Bank development and its affect one the relationship with the Glog, coupled with the more general visual impacts resulting from the presence of Llanbadarn Fynydd will substantially change and degrade the setting of the scheduled monument, altering its significance and our ability to appreciate that significance. This would result in Substantial Harm to its significance.

Beacon Hill

- 6.45. The summit area of Beacon Hill is home to a number of scheduled barrows (RD111). As with other barrows their significance resides in a range of interests, these are set out in paragraph 6.4. The significance of the scheduled monument has been recognised by its status, indicating that it is of national importance.
- 6.46. This complex of scheduled hill top barrows occupies a highly prominent location in the landscape and was sited to be seen and to see out from. The location of the barrows is unlikely to have been on the daily circuit of people's lives and its elevated otherness may indicate a different burial tradition or different social meaning to some other barrows in the area.

6.47. Currently, the setting of the barrow group is very open and exposed with long ranging views. There is limited modern infrastructure in those views and the prominence of the hill is not challenged. The proposed developments would feature prominently in a relatively narrow arc of views to the northwest and would be situated between c. 4km and 10km. This stacking of turbines would increase their visual prominence. However, the majority of the monument's setting would be unaffected and its visual prominence would not, for the most part, be challenged. Consequently, the monuments would not suffer a serious degradation of their setting, although there would be some notable change. The impact on significance is therefore limited and the developments would result in Less than Substantial Harm.

Rhos-crug barrow group

6.48. Group of scheduled barrows (RD110) occupying an elevated upland location overlooking the source of the River Lugg. As with other barrows their significance resides in a range of interests, these are set out in paragraph 6.4. The significance of the scheduled monuments have been recognised by their status, indicating that they are of national importance.

6.49. This complex occupies a very prominent location in the landscape and was clearly sited to be seen and to see out from. The elevated location of the barrows above steep valley sides means that it is unlikely that they would have been part of the everyday circle of people's lives.

6.50. Currently, the setting of the barrow group is very open and very exposed with long ranging views in all directions. There is limited modern infrastructure in those views, although long distance views of other windfarms are possible. The proposed developments would feature in a narrow arc of views to the northwest and would be situated between c. 5km and 11km. This stacking of turbines would increase their visual prominence.

6.51. The majority of the setting of the monuments would be unaffected. The impact on significance is therefore limited and the developments would result in Less than Substantial Harm.

Castell-y-bliadd

6.52. Castell-y-Blaidd (RD102) is an oval ramparted, ditched and counterscarped defended enclosure or small hillfort, measuring 35m by 55m, defined by a bank, ditch and counterscarp, having a wide entrance gap to the west. It is probably of Iron Age or Medieval date in terms of its origin although it may have multi-period usage. The monument has a clear relationship with the nearby medieval settlement (see below) and

other features, including a potential defensive ditch or possible field system are also situated close to the monument.

- 6.53. Castell y Blaidd's is a scheduled monument of national importance. Its significance relates to the evidence it provides about the development and habitation of the uplands in late prehistory and possibly through the medieval period. The form, location and role of the monument can potentially provide significant understanding of past society. The monument also has a strong form in the local landscape and has clear aesthetic values. In addition it is in a highly accessible location, by rural standards, which enable modern communities to gain ready access to it and its environs. This provides ready opportunity for people to engage with and understand the prehistoric past.
- 6.54. Castell y Blaidd is located in a locally undulating landscape, which is largely used for grazing. A network of bridleways and footpaths run in close proximity to the mound and these may reflect the position of ancient drove roads and other routeways through the landscape. The location of the monument alongside these routeways is very unlikely to be coincidental. The monument is a strong and prominent feature in the local landscape.
- 6.55. Immediate views from it to the east, north and northwest are constrained by higher ground as the landscape rises into a number of peaks at this point. There are expansive views to the south and south west. Views to the northwest include the existing windfarm development at Llandiniam.
- 6.56. The monument's setting is important to how it is experienced and understood. Access to it along the paths and bridleways enable people to experience it in its context and understand its relationship to the underlying landscape. Its rural context and expansive uncluttered views contribute to its character and significance as a rural monument on the edge of the uplands.
- 6.57. The development of Garreg Lwyd and Bryngydfa would markedly alter the setting of this monument introducing large turbines into views from the southeast then anticlockwise around to the north. Llanbadarn Fynydd and Neuadd Goch would then appear in northwesterly views. Approaches to the site from all directions would be affected by the developments, either in terms of changing backdrops of views of the monument or changing the rural character of actual approach. There would also be changes in noise levels. Our ability to appreciate it and understand the monument in its rural context would be severely degraded. The amenity and aesthetic value of the monument would be adversely affected. The scale and proximity of the turbines would also challenge the local prominence of the monument.
- 6.58. The scale and proximity of the developments mean that the setting of the monument will be significantly altered and key aspects of that setting and its significance will be severely
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degraded. The scale of change is such that the developments will cause Substantial Harm to the significance of the monument.

Scheduled medieval upland settlement near to Castell-y-bliadd

- 6.59. This scheduled deserted medieval settlement (RD155) lies to the south of the Castell y Blaidd fortified enclosure (RD102). The settlement is probably of medieval date and is likely to be later in date than Castell y Blaidd but they may have both been used at the same time. The settlement is comprised of low earthwork remains in an area of grazing.
- 6.60. The site is an important example of rural medieval upland settlement. Its significance lies in the evidence it contains about medieval life, this includes evidence of its relationships with the wider landscape and local area it would have farmed and exploited.
- 6.61. As with Castell y Blaidd (RD102), views to the east, north and northwest are constrained by higher ground as the landscape rises into a number of peaks at this point. There are expansive views to the south and south west. Views to the northwest include the existing windfarm development at Llandinam. These views and the local landscape around the site are distinctly rural and agricultural in character and this provides an appropriate setting that reflects the historic significance of the asset and provides an experience of the asset which has resonance with its original and evolved character.
- 6.62. The development of Garreg Lwyd and Bryngydfa would markedly alter the setting of this monument introducing large turbines into views from the southeast then anticlockwise around to the north. Llanbadarn Fynydd and Neuadd-goch Bank would then appear in northwesterly views. Approaches to the site, predominately from the north, south and west would also be affected by the developments, either in terms of changing backdrops of views or changing the character of the approach. The agricultural, rural character of the site's immediate and wider landscape setting would be substantially altered.
- 6.63. Together the proposed developments would substantially change and degrade the local and wider rural setting of this monument. This would affect the significance of the monument and our ability to appreciate and understand it in a context that reflects its landscape setting from the medieval period onwards. The proximity, scale and dominance of the proposed developments lead me to conclude that they will result in Substantial Harm to the significance of this asset.

Fron Top Deserted Rural Settlement

- 6.64. This scheduled deserted settlement (RD173) lies to the south of the Castell y Blaidd medieval upland settlement (RD155). As with its nearby neighbour, the settlement is probably of medieval date but may be younger than its neighbour, perhaps dating to the post medieval period. The settlement comprises earthwork remains in an area of grazing.
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- 6.65. As with its neighbour, its significance resides in the evidence it contains about medieval / post-medieval rural life, this includes evidence of its relationships with the wider landscape and local area it would have farmed and exploited.
- 6.66. Views to the north and northwest are constrained by topography, but the site is situated within an open rural landscape with clear views from the northeast, clockwise around to the southwest. The landscape around the site provides it with an appropriate setting that reflects its historic significance and provides an experience of the asset which has resonance with its original and historic character.
- 6.67. The development of Garreg Lwyd and Bryngydfa would very notably alter the setting of this monument. They would introduce large turbines into many views out from the site and affect the character of the landscape it is situated within. This would affect the significance of the monument and our ability to appreciate and understand it in a context that reflects its historic landscape setting. Whilst Fron Top is further away from the developments than the Catsell-y-blaidd settlement, it is still within c. 1.5km of the development. The scale and visual prominence of the proposed developments and the affect that they will have on the current setting of the monuments is of a degree that leads me to conclude that they will result in Substantial Harm to the significance of this asset.

Three early Medieval scheduled cross dykes

- 6.68. At the northern end of the study area, there are three scheduled lengths of early medieval cross dykes (MG062 and MG063 – two parts). These monuments are visible features in the landscape and probably served as some form of territorial statement. All three lengths occupy prominent locations crossing ridgelines. They are visible in the wider landscape and views out from them tend to be open and expansive, in particular the Two Tumps dyke (MG063). Their current setting is open and rural in character, with limited modern infrastructure and development.
- 6.69. As likely territorial markers / statements, rather than defensive structures, their setting contributes to their significance through their physical form, relationship with local landforms, their visibility and the ability to view the landscape from them to appreciate what is “within” the bounded area and what lies “without” that area. The rural character of the landscape in their environs is also important as this provides a linkage between past and present that supports understanding.
- 6.70. The development of the four windfarms would substantially alter the character of the setting of these assets. Neuadd-goch Bank and Llanbadarn Fynydd would feature strongly in views out from the monuments and would disrupt these views and some views towards the monuments. Garreg Lwyd and Bryngydfa would have lesser impacts. The proximity of Neuadd-goch Bank and Llanbadarn Fynydd, particularly Neuadd-goch Bank, means that
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the scale of change would be very noticeable and dramatic in character. This proximity and the resulting visual dominance leads me to conclude that the developments would result in Substantial Harm to the significance of the monuments due to the degradation of their visual setting and changes to the rural character of their local landscape.

Castelltinboeth

- 6.71. Castell Tinboeth (RD038) was probably constructed in the late 13th century by the powerful Mortimer family and is mentioned in documents of 1316 and 1322. Although it lies within an earlier roughly circular Iron Age hillfort. The castle itself has highly visible surviving remains include a bank, probably representing the remains of a ruinous wall, a ditch and a counterscarp enclosing an egg-shaped area of approximately 45m by 50m. There are traces of a twin-towered gatehouse at the north-eastern point.
 - 6.72. The castle was a symbol of power and important fortification in a network of defended sites across the Marches. The castle occupied an elevated and prominent position above the River Ithen. Situated at c. 400m AoD it commands wide ranging views and is visible in many long distance views along the valley. It was designed and located to be seen and to enable its occupants to observe the strategically important landscape around it. The main entrance lies on the southeast side and broad views in an clockwise arc from the west to north are therefore important in farming the backdrop as the entrance is approached.
 - 6.73. Views to and from the site, its location and relationship to the river and wider topography and its visual prominence in the landscape are all aspects of its setting that contribute substantially to its significance and our understanding of it.
 - 6.74. Currently, the castle it is situated within a rural landscape characterised by open hilltops and settled valleys with limited visual intrusion from existing wind farm developments to the northwest. The proposed developments at Llanbadarn Fynydd, Garreg Lwyd, Bryngydfa and, to a lesser extent, Neuadd Goch would notably alter views to and from the castle and affect the character of key approaches to it along the A483. Llanbadarn Fynydd, at c. 5km distant, would be very visible and prominent in important views north along the River Ithen valley, and Neuadd Goch would add to visual presence of windfarms in these views. Garreg Lwyd and Bryngydfa, at c. 5 to 6km distance, would be highly visible in north and northeasterly views. The visual setting of the castle would be altered and degraded by the proposed developments and important historic visual linkages would be harmed. This impact would be worsened further if the southern portion of the Llaithddu windfarm development was also consented.
 - 6.75. These changes would alter the character and nature of the site's setting. They would degrade important historically connections and the aesthetic value of the castle. As such they would harm the significance of the asset. The scale of harm is lessened somewhat,
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compared to other assets discussed previously, by the intervening distances which reduces the visual impact of the turbines. The volume of turbines would however be considerable and the visual affect would be across a wide arc of the setting of the site, particular in views from the site and views from the south and southwest which include the site. The turbines would also feature clearly in important views along the River Ithen. On balance, I conclude the cumulative impact of the turbines would result in Substantial harm, largely due to the scale and spread of turbines that would be visible in a wide arc of views from and to the site affecting its aesthetic value and important historic linkages and visual prominence in the landscape.

Listed Buildings

- 6.76. Figure 2 highlights the locations of listed buildings within and around the proposed development sites. The vast majority of these are grade II listed vernacular structures or chapels / churches located within the main valleys. Their settings will generally be subject to minimal disturbance or change, generally only experiencing glimpsed views or views when approaching settlements. These would not generally be considered to be significant impacts that would degrade the setting of a listed building.
- 6.77. There are however a small number of grade II listed buildings for which this would not be the case. These include:

Blaen-nant-du farmhouse and attached ranges (LB1 on Figures 2, 5 and 6).

- 6.78. The farmhouse is situated at the head of a small valley in an enclosed farm yard with modern buildings and local vegetation around. Views out of the property are therefore limited. The property does however have a distinctly rural and agricultural context which supports its significance as a post-medieval vernacular building. In addition, there are good views of the property from the elevated road to the east which enable the property to be placed in its rural context. The development of Llanbadarn Fynydd and to a lesser extent Neuadd-goch and Garreg Lwyd would very notably change the rural context of the property and affect views of it and approaches to and from it. The proximity and scale of the proposals mean that these changes would be very significant, transforming the current rural context of the property. This would adversely affect its significance as an agricultural vernacular building. Due to the scale and proximity of the proposals I am of the view that Substantial Harm would be caused.

Cwm Yr Hob Farm, Old house and attached range and Cwm Yr Hob Barn (LB2 on Figures 2 and 7)

- 6.79. The farm lies on the eastern flanks of Tyn-y-ddol Hill within a small steep sided valley. They have a very distinctly rural setting and are approached from the west along the valley

with the hill framed above. Their rural and agricultural setting notably contributes to their significance as vernacular agricultural buildings. The development of Garreg Lwyd and Bryngydfa would alter the nature of the buildings' current setting. Approaches to the complex from the west would include views of the upper parts of turbines and there would be views of turbines from the vicinity of the buildings in the complex. The proximity of the turbines would be readily apparent and they would be a very prominent feature in the local agricultural landscape that the farm is situated in. The local topography would however lessen the dominance of the developments. On balance, although the turbines would be a visible presence the discrete valley location of the asset does reduce the scale of impact and I take the view that the proposals would constitute Less than Substantial Harm to the significance of this grade II listed vernacular farm.

Summary of Impacts and Harm

6.80. The following table summarises the likely cumulative impacts and harm on individual assets that would result from the development of the four proposed schemes:

Asset	Designation	Summary of Impact	Degree of Harm
Thirteen Scheduled prehistoric barrows on the 'Glog' (MG121 and MG122) and two non-designated barrows (ND1 and ND2)	Scheduled Monuments and related non-designated assets	Fundamental change to the setting of the assets which would degrade the significance of the monuments	Substantial Harm
A linear grouping of scheduled and non-designated prehistoric monuments along the high ground at Banc Gorddwr (MG109, RD250, RD251, RD084, ND4-8 inc.)	Scheduled Monuments and related non-designated assets	Fundamental change to the setting of the assets which would degrade the significance of the monuments	Substantial Harm
A linear arrangement of prehistoric barrows running from Bryngydfa to Warren Hill (RD103, RD104, RD105, RD252, ND9-11inc., ND14)	Scheduled Monuments and related non-designated assets	Fundamental change to the setting of the assets which would degrade the significance of the monuments	Substantial Harm
Gors Lydan Barrows (RD 106)	Scheduled Monument	Degradation of visual relationships and impact on expansive views	Substantial Harm

Asset	Designation	Summary of Impact	Degree of Harm
Two Tumps (MG048)	Scheduled Monument	Degradation of visual relationships and impact on expansive views	Substantial Harm
Bryn Cwmrhiwdre Mound (MG280 and ND15)	Scheduled Monument and non-designated asset	Degradation of visual relationships and impact on expansive views	Substantial Harm
Beacon Hill (RD111)	Scheduled Monument	Change to expansive views from monuments	Less than Substantial Harm
Rhos-crug barrow group (RD110)	Scheduled Monument	Change to expansive views from monuments	Less than Substantial Harm
Castell-y-bliadd (RD102)	Scheduled Monument	Major development in proximity. Severe degradation of setting and approaches	Substantial Harm
Scheduled medieval upland settlement near to Castell-y-bliadd (RD155)	Scheduled Monument	Substantive changes to the visual and rural character of the monuments local setting	Substantial Harm
Fron Top Deserted Rural Settlement (RD173)	Scheduled Monument	Substantive changes to the visual and rural character of the monuments local setting	Substantial Harm
Three early Medieval scheduled cross dykes (MG062 and MG063)	Scheduled Monument	Disruption of views and degradation of rural context due to proximity of development	Substantial Harm
Castellinboeth (RD038)	Scheduled Monument	Extensive views of windfarms in a broad arc around the site affecting important visual and historical connections	Substantial Harm
Blaen-nant-du farmhouse and attached ranges (LB1)	Grade II listed building	Windfarm in proximity of property affecting views of and approaches to farm as well as altering rural context	Substantial Harm
Cwm Yr Hob Farm, Old house and attached range and Cwm Yr Hob Barn (LB2)	Grade II listed building	Windfarms in proximity of property affecting approaches to farm and rural context	Less than Substantial Harm

7. Conclusions

- 7.1. My evidence has demonstrated that the development of Llanbadarn Fynydd and three other proposed wind energy developments, namely Neuadd-goch Bank, Bryngydfa and Garreg Lwyd, would degrade the setting of a large number of designated and non-designated assets, including scheduled monuments and listed buildings, and also fundamentally change the character of a complex interrelated historic landscape; all of which are currently subject to little intrusion from modern infrastructure or wind energy developments. The scale of degradation is such that for many assets Substantial Harm would occur to their significance.
- 7.2. Whilst Powys County Council have not objected to Llanbadarn Fynydd on cultural heritage grounds alone, this does not indicate that I, or the Council, consider that it does not harm the setting and significance of a number of designated assets. The ES and SEI for Llanbadarn Fynydd both indicate that it will impact on the setting of a number of designated sites. My analysis of the area and the potential impacts of the developments has led me to conclude that Llanbadarn Fynydd will have particular and notable impacts on the setting of:
- The scheduled and non-designated prehistoric barrows and scheduled cross dyke on the 'Glog';
 - The linear grouping of scheduled and on-designated prehistoric barrows along Banc Gorddwyr;
 - The scheduled barrows and cross dykes at Two Tumps;
 - Castelltinboeth, the scheduled medieval castle; and
 - Grade II listed Blaen-nant-du farm.
- 7.3. The location of the development on the westerly side of the known concentrations of monuments (see Figures 2, 5,6 and 7) means that on its own Llanbadarn Fynydd is unlikely to cause Substantial Harm to these assets; and will most probably result in Less than Substantial Harm. However, Less than Substantial Harm is a broad term. Given the nature of the assets' settings and the nature of impacts, it is my view that Llanbadarn Fynydd would have notable and significant impacts on the setting and significance of these assets which should be considered to be much closer to Substantial Harm than no harm. The one exception is the grade II listed Blaen-nant-du farm, where I have concluded that Substantial Harm would occur.
- 7.4. These impacts are a material consideration in terms of local and national planning policy as set out in Welsh Office Circular 60/96: Planning and the Historic Environment: Archaeology,
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1996; Planning Policy Wales: Edition 5, November 2012; and the Powys Local Plan. In relation to EN-1 Overarching National Policy Statement (NPS) for Energy, July 2011 they will need to be taken into account when considering the advice in Section 5.8 of the Statement (see below) which clearly highlights the need to take into account harm to the significance of designated and non-designated heritage assets.

7.5. In terms of the cumulative impacts of all four proposed developments, my evidence demonstrates that substantial harm to the significance of a large number of nationally important assets would occur as a result of the degradation of their settings. The scale and extent of harm is such that it is undoubtedly contrary to Welsh and local planning policy set out in Welsh Office Circular 60/96: Planning and the Historic Environment: Archaeology, 1996; Planning Policy Wales: Edition 5, November 2012; and the Powys Local Plan.

7.6. The scale of this harm also needs to be examined in the context of guidance in EN-1 which states:

“5.8.14... Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II listed buildings; grade I and II* registered parks and gardens; and World Heritage Sites, should be wholly exceptional.*

5.8.15 Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss. Where the application will lead to substantial harm to or total loss of significance of a designated heritage asset the IPC should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm.

5.8.18 When considering applications for development affecting the setting of a designated heritage asset, the IPC should treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the IPC should weigh any negative effects against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval”

7.7. This advice clearly indicates that substantial public benefits would be required to justify approval of the four proposed schemes given the number of scheduled monuments whose significance would be substantially harmed and the wider degradation that would occur to related non-designated assets.

7.8. Although three of the developments are not before this inquiry, the cumulative impacts are still an important issue that require consideration. As set out in Mr Russell-Vick’s evidence, the development of Llanbadarn Fynydd would degrade the landscape character and quality

of the area. Consent for this scheme would change the baseline situation in the area and consequently lessen the potential landscape character and visual amenity impacts associated with the other proposed schemes. The degradation of the setting of identified heritage assets caused by Llanbadarn Fynydd would also change the baseline situation for those assets. This may have the additional effect of lessening the potential harm caused by other proposed schemes as the setting of those assets would already be degraded. These factors could lead to other schemes being consented on a piecemeal basis with gradually increasing harm to the historic environment.

7.9. It is therefore important to understand the potential cumulative impacts associated with the development of the four schemes before decisions are taken on any of them on an individual basis.

7.10. On a final note, it is also worth considering the advice within Cadw's Conservation Principles and, pertinently, the PPS5 Practice Guide.

7.11. In relation to balancing heritage conservation needs with other requirements Cadw's Conservation Principles state in paragraph 39 that:

"Changes which would harm the heritage values of an historic asset will be unacceptable unless:

a. the changes are demonstrably necessary either to make that asset sustainable, or to meet an overriding public policy objective or need; and

b. there is no reasonably practicable alternative means of doing so without harm; and

c. that harm has been reduced to the minimum consistent with achieving the objective; and

d. it has been demonstrated that the predicted benefit decisively outweighs the harm to the values of the asset, considering

- its comparative significance;*
- the impact on that significance; and*
- the benefits to the asset itself and/or the wider community or society as a whole."*

[my highlights]

7.12. The PPS5 Practice Guide remains valid and relevant to EN-1 and EN-3 (see Section 3 of this evidence). This states in paragraph 91 that:

"Where substantial harm to, or total loss of, the asset's significance is proposed a case can be made on the grounds that it is necessary to allow a proposal that offers substantial public benefits. For the loss to be necessary there will be no other reasonable means of delivering similar public benefits, for example through different design or development of an appropriate alternative site".

[my highlights]

- 7.13. Both sets of guidance indicate that substantial harm can be acceptable if conditions relating to need, alternatives and public benefit can be met.
 - 7.14. Delivery of renewable energy is a public policy objective in Wales and therefore needs to be taken into account. As set out in EN-3, the need for renewable energy sources needs to be taken into account when weighing up the public benefits afforded by onshore wind energy schemes. The Council will be providing further evidence on the balance between public benefit and harm in the final session.
 - 7.15. There are however issues with the tests for “*practicable alternatives*” and “*no other reasonable means of delivering similar public benefits*”.
 - 7.16. TAN8 has defined capacity targets for SSAC that if met would contribute to the Welsh Government's targets and enable the public policy objective to be achieved. In SSAC these targets can be met through development adjacent to the Llandinam Windfarm to the west. Development here would not result in the substantial harm to the assets discussed in Section 6 and harm to other designated assets in the vicinity of Llandinam Windfarm would be less substantial due to the existing impacts on the setting of designated assets in this location. The Substantial Harm caused to the designated assets addressed in my evidence cannot be justified in terms of the delivery of TAN8 objectives given that there are reasonable and practicable less harmful alternatives in different locations for delivering similar public benefits.
 - 7.17. Even disregarding the TAN8 targets, there still remains a question around whether the predicted benefits of the scheme outweigh the harm caused. This is a key policy test in terms of EN-1 and EN-3 and supporting guidance in the PPS5 Practice Guide, it is also a factor in the approach advocated by Cadw's Conservation Principles. As set out above, the Council will be providing further evidence on this aspect in the final session.
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