

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

**SUMMARY PROOF OF EVIDENCE: HISTORIC
ENVIRONMENT**

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On behalf of Powys County Council

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1. Qualifications and Experience

- 1.1. My name is Andrew Croft. I am an Associate Director in Atkins Ltd. I am a professional heritage consultant with a BA in Archaeology and Prehistory and a MA in Landscape Archaeology. I have over 18 years experience in archaeology, heritage management and environmental planning.
- 1.2. Atkins was appointed by Powys County Council (PCC) in February 2013 to provide advice on heritage matters in connection with a number of wind farm proposals and applications.

2. Scope of Evidence

- 2.1. 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,

3. Setting and the Assessment of Harm

- 3.1. Setting has been the subject of considerable debate and discussion. In terms of current approaches there is a high degree of similarity in definitions across policy and guidance in Wales and England. Cadw's "Conservation Principles" (2011) defines it as:

"The surroundings in which an historic asset is experienced, its local context, embracing present and past relationships to the adjacent landscape."

- 3.2. The National Planning Policy Framework for England, the terminology of which underpins EN-1 Overarching National Policy Statement (NPS) for Energy, July 2011, 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."

- 3.3. 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.
 - 3.4. 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
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creation. In this regard, the English Heritage document '*Guidance on the Setting of Heritage Assets*' is relevant to the Inquiry in terms given its relationship to EN-1 and EN-3 and its status as accepted good practice.

Harm

- 3.5. 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.
- 3.6. The process I have adopted for assessing impact and harm is as follows:
 - 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.
- 3.7. In terms of assessing impacts on assets I have 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. Overview of Historic Environment

Introduction

- 4.1. The four proposed developments lie on the border of Radnorshire and Montgomeryshire in a landscape defined by mountainous ridges and uplands and deep river and stream valleys. Human settlement in the area is centred on the two main valleys of the River Teme and the River Ithlon. The upland areas between the main valleys are the focus for the applications. These uplands do not have the height and remoteness of uplands to the west and north. They are characterised by a combination of open moorland and rough grazing; and enclosed improved pasture with a fieldscape of smaller more irregular fields. 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

- 4.2. The area has been analysed through the Landmap programme. The Landmap assessment included the definition and examination of historic landscape areas. Each of the proposed developments lies in one, or more, of the following Landmap Historic Landscape areas:
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- Kerry Hills (MNTGMHL124), area of outstanding value.
- Kerry Ridgeway (RDNRHL121), area of high value.
- Upper Ithlon (RDNRHL613), an area of high value.
- Pen Ithlon (RDNRHL997), an area of moderate value.
- Upper Teme (RDNRHL806), an area of high value.

Landscape Development and Evidence

Prehistoric

- 4.3. The area has evidence of Prehistoric use and occupation, including flint scatters, settlement sites, barrows and funerary monuments. The most notable surviving monuments are the barrows, which crown prominent hills or occupy distinctive topographical locations along watersheds, ridgelines or at the heads of passes. They 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.
- 4.4. 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.

Early Medieval and Medieval Periods

- 4.5. Early medieval landscape features survive in the wider landscape including three cross dykes. Additionally, the settlement near Castell-y-blaidd may have its origins in the period. Later Medieval activity is well represented with evidence of settlement and field systems. The wider area also includes Castelltinboeth, a prominent and strategically placed medieval castle site which was sited to control the river valley and to provide a visual reminder of the power and prestige of the builder and occupier.

Post Medieval

- 4.6. Post medieval activity is present throughout the area. The current fieldscape was probably largely established during the 19th century. This period is also largely responsible for the

core of the building stock and forestry plantations. A number of listed post medieval buildings can be found in and around the proposed development sites.

Conclusions and summary

- 4.7. The proposed windfarms lie within a wider multi-period historic landscape that contains evidence of human occupation from early prehistory onwards. Key designated sites 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- blaidd, 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- blaidd; and
 - Castelltinboeth, a scheduled medieval castle.
- 4.8. 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.

5. Cumulative impacts

- 5.1. 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' and two non-designated barrows	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

Asset	Designation	Summary of Impact	Degree of Harm
A linear grouping of scheduled and non-designated prehistoric monuments along the high ground at Banc Gorrddwr	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	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	Scheduled Monument	Degradation of visual relationships and impact on expansive views	Substantial Harm
Two Tumps	Scheduled Monument	Degradation of visual relationships and impact on expansive views	Substantial Harm
Bryn Cwmrhiwdre Mound	Scheduled Monument and non-designated asset	Degradation of visual relationships and impact on expansive views	Substantial Harm
Beacon Hill	Scheduled Monument	Change to expansive views from monuments	Less than Substantial Harm
Rhos-crug barrow group	Scheduled Monument	Change to expansive views from monuments	Less than Substantial Harm
Castell-y- blaidd	Scheduled Monument	Major development in proximity. Severe degradation of setting and approaches	Substantial Harm
Scheduled medieval upland settlement near to Castell-y- blaidd	Scheduled Monument	Substantive changes to the visual and rural character of the monuments local setting	Substantial Harm
Fron Top Deserted Rural Settlement	Scheduled Monument	Substantive changes to the visual and rural character of the monuments local setting	Substantial Harm
Three early Medieval scheduled cross dykes	Scheduled Monument	Disruption of views and degradation of rural context due to proximity of development	Substantial Harm
Castelltinboeth	Scheduled Monument	Extensive views of windfarms in a broad arc around the site affecting important visual and historical connections	Substantial Harm

Asset	Designation	Summary of Impact	Degree of Harm
Blaen-nant-du farmhouse and attached ranges	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	Grade II listed building	Windfarms in proximity of property affecting approaches to farm and rural context	Less than Substantial Harm

6. Conclusions

6.1. Powys County Council has not objected to Llanbadarn Fynydd on cultural heritage grounds. This does not indicate that the development does not harm the setting and significance of a number of designated assets. My analysis leads me to conclude that it would have notable impacts on:

- 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.

6.2. It is unlikely to cause Substantial Harm but would cause Less than Substantial Harm. The one exception is the grade II listed Blaen-nant-du farm, where I have concluded that Substantial Harm would occur. These impacts are a material consideration in terms of local and national planning policy. In relation to EN-1 they will need to be taken into account when considering the advice in Section 5.8.

6.3. In terms of the cumulative impacts of the proposed developments, my evidence demonstrates that substantial harm to the significance of a large number of nationally important assets would occur as 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.

6.4. The scale of this harm also needs to be examined in the context of guidance in EN-1 which indicates that substantial public benefits would be required to justify approval of the four proposed schemes.

- 6.5. 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 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. These factors could lead to other schemes being consented on a piecemeal basis with gradually increasing harm to the historic environment.
- 6.6. 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.
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