

## **Nant Mithil Consultation Historic Environment. Report for CPRW.**

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### **Scheduled Monuments**

Cwm Bwch Round Barrow Pair, Great Rhos Barrow and Shepherd's Tump Barrow

The baseline assessment and assessment of impact on these four barrows given in the Historic Environment Assessment (HEA, Vol.3, Appendix 6.1, Chapters 4 and 5) is detailed and thorough.

It is accepted there that the positioning of these prehistoric monuments was deliberate and that this can be clearly understood today. Much consideration has been given to retaining sight lines between the barrows themselves as a key issue. It is stated that, despite the installation of huge industrial machinery surrounding the monuments, the landscape will remain recognisable and perceptible (e.g. HEA 5.31-32).

The landscape surrounding the barrows, particularly Great Rhos and the Cwm Bwch pair, has remained largely unchanged over the four thousand or so years that have elapsed since the mounds were first created. But the presence of 205m high turbines (only 130m away in the case of the Cwm Bwch pair) with the attendant noise and movement, will represent a very significant change to the surrounding landscape and will completely compromise the appreciation of the barrows and their surroundings.

It is not made clear why sightlines between the barrows themselves might have been considered important in the Bronze Age, but even where turbines have been positioned to allow intervisibility, the barrows will only be visible through a network of huge turbines amongst which the barrows themselves are diminutive structures, as fig 6.7 in vol 4 makes very clear.

What is also very evident to an observer today is that the barrows along the ridge (Cwm Bwch Pair and Great Rhos) were obviously intended to be seen from the ridge to the west, and in particular from what is described in the assessment as the natural route along that ridge, which has historically been a route across the Forest. That is a critical contribution to their significance. Shepherd's Tump Barrow is equally intended to be seen from the routeway but has been so placed that it is also visible from a large area to the west (as is recognised at 4.20 of the HEA). Again, this is a critical contribution to its significance.

If the proposed development were to proceed, both these aspects of the monuments would be almost totally lost. The landscape surrounding them would be massively changed, and the noise and movement of the turbines would make it impossible to visualise the circumstances of their creation. The barrows would be completely dwarfed by the turbines when viewed from the ancient routeway and any understanding of the intention of their creators would be severely compromised.

This is evidently a substantial level of change to how the significance of the barrows is understood, appreciated, or experienced, and so we would question the assessment of the level of impact as being only moderate. In any case, this would be an unacceptable adverse impact on nationally important heritage assets.

**The level of impact on the scheduled monuments of Cwm Bwch Round Barrow Pair, Great Rhos Barrow and Shepherd's Tump Barrow through the change in their setting is major, not moderate.**

### **Listed Buildings**

The impact on listed buildings through the effect on their setting is assessed in table D2 of the HEA. While some of the buildings have been screened out as having no theoretical visibility with the Proposed Development, all the rest have been screened out on the grounds that their setting does not extend as far as the Proposed Development. No explanation is offered as to why the setting does not include the location of the Proposed Development, or what the extent of the assets is believed to be.

Setting is defined by CADW as follows:

‘The setting of a historic asset includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape.’ (*Setting of Historic Assets in Wales*, CADW, May 2017)

CADW also advises that ‘Setting often extends beyond the property boundary of an individual historic asset into a broader landscape context.’(p1)

One example might be given. The Church of St Tecla in Llandegley is listed at Grade II, together with the churchyard. The hill called Foel stands around 240m higher than the church, to the east. It is very obviously a landscape feature in the setting of the church, and turbine T14 will stand 200m higher, very visible and obviously within the setting of the church and graveyard. But the assessment says that the setting of the church does not extend that far so there will be no impact, even though this contradicts the definition of setting given in the CADW guidance. No evidence is offered as to why the setting of St Tecla’s stops short of the surrounding landscape.

The result of this approach is that the impact upon every single listed building in either the core area or the wider area is screened out, without any assessment being made, even where the impact on the significance of the asset through the change in its setting is clearly harmful. This clearly contradicts policy and guidance and in this respect the assessment is entirely deficient.

**The assessment of the impact on listed buildings should follow accepted guidance with respect to the definition of setting. The impact on at least some of the listed buildings affected is clearly harmful.**

END.