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13th October 2016

Dear Justin,

Variation of Condition 2 on W/31728 (Turbine height) at Land North of Esgairliving, Rhydcymerau, Llandeilo, Carmarthenshire - response to Cadw comments re proposal to increase turbine height.

I have reviewed the Cadw response from Denise Harris dated 22nd September 2016 that you forwarded to me. I have also been able to examine the revised ZTV in relation to the previously mapped designated historic environment assets that were assessed for impact on their settings as part of the original planning application for 100m turbine tip height.

Cadw have responded to the proposal for a maximum 125m turbine tip height by suggesting that for a number of designated historic environment assets the impact on their settings would be altered as follows:

Scheduled Monument	CgMs initial assessment of significance of impact on setting	Cadw revised assessment of significance of impact on setting
Three Round Cairns SE of Blaen Carreg (CM084)	Negligible	Slight
Pen Lan round barrow cemetery (CM313)	Negligible	Slight
Gelli Dewi Uchaf linear round barrow cemetery (CM 315)	Negligible	Slight
Pen y Gaer Hillfort (CM101)	No impact	Very Slight

This assessment of change to the significance of impacts on the settings of these assets is based on the assumption that the increased turbine height would result in an increase in the likelihood of intervisibility between the assets listed above and the turbine blades. With the proviso that all such assessment carries an element of subjectivity, and although no ground-truthing has yet been carried out to re-assess the impacts on the assets listed, it is considered that this is a reasonable assumption and that Cadw's revised assessment is accepted.

In addition, the revised ZTV using the new proposed turbine height of 125m as the baseline has brought just one additional designated historic environment asset into consideration in terms of potential impacts. This is the Caer Pencarreg Hillfort (CM173), approximately 3.5km north-east of the proposed turbine locations. This asset was outside of the original ZTV and therefore it was considered that no impact could arise on its setting from the proposed turbine due to lack of intervisibility. The revised ZTV maps this asset at its fringe, and so it may now fall within the ZTV and therefore have some intervisibility with the turbines.

It seems a reasonable assumption that the significance of impact on the setting will change to at least a similar level as Pen y Gaer Hillfort, regarded now as Very Slight. It may also be considered, however, that the hillfort will be subject to the same scale of impact as the adjacent Gelli Dewi Uchaf linear round barrow cemetery, which is now considered to be subject to a Slight significance of impact.

As any potential impact has not been ground-truthed, it seems reasonable that a Very Slight to Slight range of significance of impact can now be considered for this asset.

This is expressed in the following table:

Scheduled Monument	CgMs initial assessment of significance of impact on setting	CgMs revised assessment of significance of impact on setting
Caer Pencarreg Hillfort (CM173)	No impact	Very Slight to Slight

What is clear from Cadw's revised assessments and the examination of the new ZTV extent, is that the potential impact on designated historic environment assets that could result from the proposed variation to the maximum turbine height is not such that any significant additional harm could arise to the historic environment.

The perceived level of harm, in my opinion, remains at a level which would not preclude development on the grounds of adverse impact on the historic environment.

Yours sincerely

Philip Bethell BA MCIfA

Associate Director (Archaeology)



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Mr. Richard Jones
Planning Services
Carmarthenshire County Council

Reply by e-mail:
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Eich cyfeirnod Your reference	W/34341
Ein cyfeirnod Our reference	DE
Dyddiad Date	4 November 2016
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Dear Mr. Jones,

Variation of Condition 2 on W/31728 (Turbine Height), Land North of Esgairliving, Rhydcymerau, Llandeilo, Carmarthenshire

Thank you for your e-mail of 21 October 2016 inviting our comments on additional information provided in respect of the planning application for the proposed development as described above.

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. It is a matter for the local planning authority to then weigh our assessment against all the other material considerations in determining whether to approve planning permission, including any issues concerned with listed buildings and conservation areas.

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), technical advice notes and circular guidance. PPW explains 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 not. Furthermore, it explains that 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. Paragraph 17 of Circular 60/96, *Planning and the Historic Environment: Archaeology*, elaborates by explaining that this means 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. PPW also explains that local authorities should protect parks and gardens and their settings included in the first part of the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales.

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

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

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



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE



Additional information in support of this application has been submitted by the applicant in the form of a letter prepared by CGMS responding to our previous comments on this application.

It appears that CGMS concur with our assessment of the impact of the taller turbines on the settings of the scheduled monuments previously identified. They also note that the additional height of the turbines will make them visible from scheduled monument Caer Pencarreg Hillfort (CM173) and have assessed that the impact on the setting of this monument will be very slight to slight. We concur with this assessment.

Yours sincerely

Dave Edwards
Diogelu a Pholisi/ Protection and Policy



Llywodraeth Cymru
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Eich cyfeirnod
Your reference

Ein cyfeirnod
Our reference

Dyddiad
Date

Llinell uniongyrchol
Direct line

Ebost
Email:

MynyddPencarreg_Pre-app_WM_1

LC

1 March 2021

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cadwplanning@gov.wales

Dear Mr Brown

Pre-Planning Application - Two wind turbines (up to 125m tip) and associated infrastructure works, Esgairliving Farm, Rhydcwmerau, Llandeilo

Thank you for your letter of 5 February inviting our comments on the pre-planning application consultation for the proposed development described above.

Advice

The following comments are based on information made available to us as part of the pre-application consultation and we will review our comments when we are consulted on the final planning application. Our assessment of the pre-application is given below.

Having carefully considered the information provided, we have no objection to the proposed development in regards to the scheduled monuments listed in our assessment of the application below.

Our assessment of the pre-application is given below.

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

Assessment

CM073 Crugiau Edryd Round Barrows
CM074 Crug y Bwdran
CM084 Three Round Cairns SE of Blaen Carreg
CM101 Pen y Gaer
CM173 Caer Pencarreg
CM196 Pant-Teg Standing Stone
CM312 Derlwyn round barrow cemetery
CM313 Pen Lan round barrow cemetery
CM315 Gelli Dewi Uchaf linear round barrow cemetery

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

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

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.
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BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE



This statutory pre-planning application is for two 125m high wind turbines with associated infrastructure at Esgairliving Farm, Rhydcwmerau.

Planning consent (W31728) has been previously granted for the erection of two wind turbines up to 100m high, but so far, this has not been enacted. The current application is to allow the turbines to be 125m high. The proposed turbines will therefore be 25m higher than the ones with extant consent.

The original application for the 100m high turbines was accompanied by a historic environment desk based assessment prepared by CGMS that considered the impact of the proposed development on the settings of the above scheduled monuments. This impact was reassessed by CGMS in October 2016 when an application to vary a condition, to allow 125m high turbines to be used, was considered. At that time it was assessed that the 125m high turbines would have a slight adverse impact on the settings of scheduled monuments CM084 Three Round Cairns SE of Blaen Carreg; CM173 Caer Pencarreg Hillfort; CM313 Pen Lan round barrow cemetery and CM315 Gelli Dewi Uchaf linear round barrow cemetery and a very slight adverse impact on the setting of scheduled monument CM101 Pen y Gaer Hillfort Hillfort. It was also considered that the 125m high turbines would have no impact on the settings of scheduled monuments CM073 Crugiau Edryd Round Barrows, CM074 Crug y Bwdran, CM196 Pant-Teg Standing Stone and CM312 Derlwyn round barrow cemetery.

There have been no material changes to the historic environment since October 2016 and therefore the GCMS assessment that we agreed with, remains valid.

Finally, there may also be undesignated historic assets that could be affected by the proposed development and, if you have not already done so, we would advise that you consult the Historic Environment Record held by the Dyfed Archaeological Trust www.dyfedarchaeology.org.uk

Yours sincerely,



Diogelu a Pholisi / Protection and Policy

Annex A

Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

National Policy

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Technical Advice Notes and related guidance.

PPW [planning-policy-wales-edition-10.pdf](#) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)

[Technical Advice Note 24: The Historic Environment](#) elaborates by explaining that when considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains.

Historic Parks and Gardens

PPW also explains that local authorities should value, protect, conserve and enhance the special interests of parks and gardens and their settings included on the register of historic parks and gardens in Wales and that the effect of a proposed development on a registered park or garden or its setting should be a material consideration in the determination of a planning application.