



Development of national significance in the renewable energy sector

Heritage Impact Statement

Penderi Solar Farm,
Land at Blaenhiraeth Farm,
Llangennech, Llanelli, SA14 8PX

VARIATION SUBMISSION

December 2020 | BRS.4254

Land at Penderi/ Blaenhiraeth Farm Carmarthenshire

Heritage Impact Statement

CA Project: CR0170

CA Report: CR0170_03

prepared by	Eva Heimpel, Assistant Heritage Consultant
date	October 2020
checked by	Claudia Jorge, Heritage Consultant
date	November 2020
approved by	Andrew Burn, Principal Heritage Consultant
signed	
date	December 2020
issue	3

This report is confidential to the client. Cotswold Archaeology accepts no responsibility or liability to any third party to whom this report, or any part of it, is made known. Any such party relies upon this report entirely at their own risk. No part of this report may be reproduced by any means without permission.

<p>Cirencester Building 11 Kemble Enterprise Park Cirencester Gloucestershire GL7 6BQ</p> <p>t. 01285 771022 f. 01285 771033</p>	<p>Milton Keynes Unit 8 – The IO Centre Fingle Drive Stonebridge Milton Keynes Buckinghamshire MK13 0AT</p> <p>t. 01908 564660</p>	<p>Andover Stanley House Walworth Road Andover Hampshire SP10 5LH</p> <p>t. 01264 347630</p>	<p>Exeter Unit 1 – Clyst Units Cofton Road Marsh Barton Exeter EX2 8QW</p> <p>t. 01392 573970</p>	<p>Suffolk Unit 5, Plot 11 Maitland Road Lion Barn Industrial Estate Needham Market Suffolk IP6 8NZ</p> <p>t. 01449 900120</p>
e. enquiries@cotswoldarchaeology.co.uk				

CONTENTS

1.	INTRODUCTION.....	4
2.	METHODOLOGY.....	8
3.	THE PROPOSED DEVELOPMENT.....	11
4.	GRADE II LISTED BRIDGE OVER AFON MORALIS – IMPACT ASSESSMENT.....	17
5.	CONCLUSION.....	22
6.	REFERENCES.....	23

SUMMARY

Project Name: Land at Penderi/ Blaenhiraeth Farm, Carmarthenshire
Location: Llannon, Carmarthenshire
NGR: 254363, 205141

This Heritage Impact Statement has been prepared to support a DNS application for a proposed solar park at Penderi/ Blaenhiraeth Farm, Carmarthenshire. This report has been commissioned in response to consultation advice as received from Cadw in December 2019 and focuses on the impact of the proposed solar park development on the Grade II Listed Bridge across the Afon Moralis, which is subject to an application for listed building consent. This report fulfils the requirement for a Heritage Impact Statement to be submitted with such an application.

The preferred option for the cable run is to run the cable along the route of the road which crosses the Afon Moralis. This option was accepted in principle by the Carmarthenshire Council and CADW during the informal and formal pre-apps. However, an alternative option is presented to run the cable beneath the riverbed of the Afon Moralis whereby the preferred option will result in harm to the Grade II Listed Bridge. This document has been updated to assess the alternative option for the cable run, as recommended by Cadw.

The use of methodology for the installation of the cable will be determined by a pre-commencement condition survey which will determine the depth of modern material of the road over the Grade II Listed Bridge. Whereby the modern material is greater than 350mm the preferred option will be undertaken. However, whereby modern material is found to be less than 350mm, the alternative option for cabling underneath the riverbed will be undertaken. This will ensure that the installation of the cable does not impact on the historic fabric of the Bridge. Therefore, the cable will not impact, either physically or non-physically, upon the significant elements of the bridge which are derived from its evidential, historic, and aesthetic value. This is the result of a careful development installation methodology which will be confirmed with the Carmarthenshire Local Council.

As such, the proposed installation of the cable route will not result in change or harm to the key values of the bridge and there will be no harm to its significance. Intrusive works to the listed bridge will be subject to a listed building consent. Whereby the associated planning application and listed building consent is granted, it is recommended that this agreed methodology be implemented as a condition.

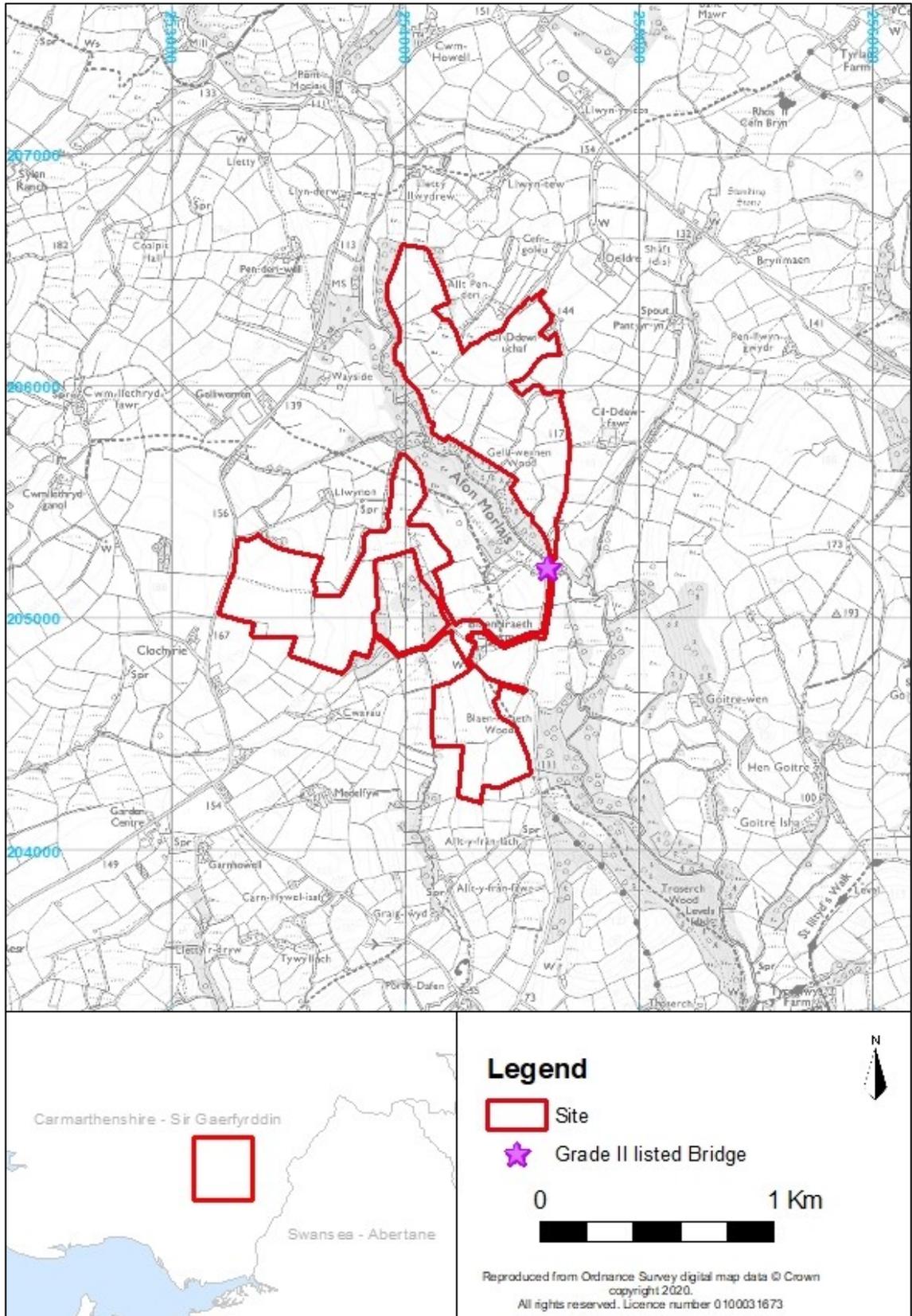


Fig. 1 Site location plan

1. INTRODUCTION

- 1.1. This Heritage Impact Statement has been prepared by Cotswold Archaeology and commissioned by Pegasus Group, on behalf of Voltalia Group to support an DNS application for a proposed solar park at Penderi/Blaenhiraeth Farm, Carmarthenshire (hereafter referred to as ‘the Site’; Fig. 1).
- 1.2. A planning application for a proposed solar park on this Site was submitted in January 2020 (Ref: DNS/00422) accompanied by a Heritage Assessment produced by Cotswold Archaeology in 2019. In March 2020, the application was accepted and then suspended for a number of months due to the coronavirus pandemic. The determination period resumed on 5th September and ended on 9th October. Within this period, Carmarthenshire County Council published its Local Impact Report, and responses were provided by consultees and third parties. The Local Impact Report put forward suggests for modifications to the design, following which the applicant introduced a variant to the design which was accepted by the Planning Inspectorate on 3rd December 2020.
- 1.3. This report has been prepared to consider the amendments to the proposed development and takes into consideration comments from the relevant consultees. This includes the response from Cadw as part of the pre-application consultation dated 1st October 2019 which stated that:
- ‘A heritage impact assessment summarised in a heritage impact statement will need to be submitted in support of the application for listed building consent’.*
(Cadw 2019),
- 1.4. And, the response from the Planning Inspector Request dated 29th September 2020 which reiterated the need for a Heritage Impact Assessment and stated:
- ‘Applications for listed building consent must be accompanied by a HIS’* (The Planning Inspectorate 2020).
- 1.5. As such, this report focuses solely on the impact of the proposed development on the Grade II Listed Bridge over Afon Morlais (Fig. 1), for which an application for listed building consent is being submitted. The additional heritage assets within proximity to the Site will not be affected, either physically or non-physically, as a result of the proposed development, as detailed in Cotswold 2019, and thus do not

need to be considered further in this Heritage Impact Statement. Indeed, the consultation response from Cadw stated that:

[an impact assessment of wider assets in vicinity of the Site is] *'not a requirement for assessments submitted with a planning application'* (Cadw 2019).

1.6. For a discussion on the effects of the proposed development on additional heritage assets and the archaeological resource, the Cotswold Archaeology 2019 Heritage Assessment should be consulted.

1.7. The Planning (Listed Buildings and Conservation Areas) (Wales) Regulations 2012 (as amended¹) states at 6 (2) (e) that:

'a Heritage Impact Statement must contain a summary of the options considered for the purpose of achieving the objective referred to in paragraph (2)(b) and the reasons why the proposals to which the application relates are preferred' (Welsh Government 2017c).

1.8. And at 6 (2) (b) that:

'an explanation of the objective that the works are intended to achieve and why they are desirable or necessary' (Welsh Government 2017c).

1.9. This is also reinforced in the Cadw document 'Heritage Impact Assessment in Wales'. The preferred option for the cable run is to run the cable along the route of the road which crossed the Afon Moralis. This option was accepted in principle by the Carmarthenshire Council and CADW during the informal and formal pre-apps. Likewise, the option of undertaking directional drilling under the bridge is not viable due to the ground conditions. However, an alternative option is presented to run the cable beneath the riverbed of the Afon Moralis whereby the preferred option will result in harm to the Grade II Listed Bridge. This alternative methodology is presented following a response from Cadw on 9th October which recommended that alternative methods should be presented. The methodologies for both options are detailed below.

Objectives and professional standards

1.10. The aim of this report is to assess the impact of the proposed development on the Grade II Listed Bridge over Afon Morlais which is being subject to an application for listed building consent. This includes the determination of the significance of the listed bridge. The significance of the asset is then assessed along with the impact on this significance as a result of the proposed development.

1.11. Cotswold Archaeology (CA) is a Registered Organisation with the Chartered Institute for Archaeologists (CIfA). This report has been prepared in accordance with appropriate standards and guidance, including the ‘Standard and Guidance for Historic Environment Desk-Based Assessment’ published by CIfA (2020). This states that, insofar as they relate to the determination of planning applications, heritage desk-based assessments should:

‘...enable reasoned proposals and decisions to be made [as to] whether to mitigate, offset or accept without further intervention [any identified heritage] impact’ (CIfA 2020, 4).

Statute, policy and guidance context

1.12. This assessment has been undertaken within the key statute, policy and guidance context presented within Table 1.1. The applicable provisions contained within these statute, policy and guidance documents are referred to, and discussed, as relevant, throughout the text. The provisions for heritage set out in the Historic Environment (Wales) Act 2016 and its supporting ‘Technical Advice Note 24’ should be noted and Planning Policy Wales. Fuller detail is provided in Appendix 1.

Statute	Description
Historic Environment (Wales) Act 2016	An Act passed by the National Assembly for Wales on 9 February 2016 which became law on 21 March 2016. The Act amends the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990. It also contains new stand-alone provisions for matters such as historic place names and historic environment records.
Technical Advice Note (TAN) 24: The Historic Environment	The TAN provides guidance on how aspects of the historic environment should be considered. It has replaced the former Welsh Office Circulars 60/96, 61/96 and 1/98.
Planning Policy Wales (Edition 10, November 2018)	Provides the Welsh Government’s planning policies and describes how these are expected to be applied within the planning system. The Historic Environment is subject to Chapter 6 (page 123).
Cadw Best Practice Guidance	The first titles on an intended series of best-practice guides have been published. These augment the provisions of the Historic Environment (Wales) Act.
Planning (Listed Buildings and Conservation Areas) Act (1990)	Act of Parliament placing a duty upon the Local Planning Authority (or, as the case may be, the Secretary of State) to afford due consideration to the preservation of Listed Buildings and their settings (under Section 66(1)), and Conservation Areas (under Section 72(2)), in determining planning applications.

Statute	Description
Town and Country Planning, Wales The planning (Listed Buildings and Conservation Areas) (Wales) (Amendment No2) Regulations 2017	<p>These Regulations amend the Planning (Listed Buildings and Conservation Areas) (Wales) Regulations 2012.</p> <p>Regulation 2 replaces the requirement that an application for listed building consent is accompanied by a design and access statement, with a requirement that an application for listed building or conservation area consent is accompanied by a heritage impact statement. It also adds to existing provision about the form and manner in which claims for compensation are made, to include reference to claims arising under section 28B (compensation for loss or damage caused by interim protection) and section 44D (temporary stop notices: compensation), both of the Planning (Listed Buildings and Conservation Areas) Act 1990. Regulation 3 contains a transitional provision.</p>
National Development Framework 2020-2040 (Draft)	<p>The NDF sets out policies for national development including energy, transport, water and waste projects. Consultation for this document ended in November 2020.</p>
Carmarthenshire Local Development Plan (2014)	<p>The LPD sets out policies and proposals that are used to determine planning applications and to guide future development opportunities.</p>

Table 1.1 Key statute, policy and guidance

2. METHODOLOGY

Assessment of heritage significance

- 2.1. Determination of significance has been undertaken according to the industry standard guidance on assessing heritage value in Wales, provided within 'Conservation Principles, Policies and Guidance for the sustainable Management of the Historic Environment in Wales' (Cadw 2011). This approach considers heritage significance to derive from a combination of discrete heritage values: **i)** evidential (archaeological) value, **ii)** historic (illustrative and associative) value, **iii)** aesthetic value, **iv)** communal value, amongst others. Further detail of this approach, including the detailed definition of those aforementioned values, as set out, and advocated, by Cadw, is provided in Appendix 1 of this report.

Assessment of potential development effects (benefit and harm)

- 2.2. The present report sets out, in detail, the ways in which identified susceptible historic assets might be affected by the proposed development, as well as the anticipated extent of any such effects. Physical effects which result from the direct truncation of archaeological remains and non-physical effects which result from changes to the setting of historic assets have been assessed within this report. With regard to non-physical effects or 'settings assessment', this has been undertaken in accordance with the approach outlined in the guidance Historic Environment Good Practice Advice in Planning: Note 3: The Setting of Heritage Assets (English Heritage, 2011) and the Welsh Governments Setting of Historic Assets in Wales document (Cadw, 2017b) (presented in greater detail in Appendix 1).
- 2.3. The 'Setting of Historic Assets in Wales' (Cadw 2017) provides guidance on setting and development management, including the assessment of the implications of the proposed development. It reiterates that 'the setting of a heritage asset is 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'. In accordance with the guidance, the extent of the setting of a heritage asset is not fixed and can evolve periodically.
- 2.4. The extent and importance of setting is often expressed by reference to visual considerations, but can also comprise other elements which contribute to the ways in which a historic asset is experienced, including factors such as noise, vibrations,

dust or other pollutants; spatial associations; the rarity of comparable survivals of setting, and associative relationships between historic assets.

- 2.5. The 'Conservation Principles' states that: 'The assessment of the degree of harm to an historic asset needs to consider the impact of any proposal on its heritage values' (Cadw 2011, 31). 'Heritage Impact Assessment in Wales' states that: 'Your heritage impact statement will need to demonstrate that you have considered the potential impact of your preferred approach. You will need to show how your proposed work will sustain or enhance the significance of your historic asset, including potential benefits and any harm' (Cadw 2019, 9). Planning Policy Wales states that: 'The greater the significance and/or impact then the greater the benefit needed to justify any harm' (para. 6.5.1).
- 2.6. The methodology for the assessment of the setting of historic assets employed by Cotswold Archaeology has been informed by this guidance, which has been widely adopted by local planning authorities in Wales. A stepped approach is recommended for assessing the implications of development proposals.
- 2.7. The first step is to consider the site context, and whether, from a heritage point of view, there are other reasonable alternatives that should be preferred for development. In addition, this step identifies the historic assets affected, and the aspects of their settings which would be affected by the proposed development.
- 2.8. Step 2 is to assess whether, how, and to what degree, these settings make a positive contribution to the significance of the historic asset(s), i.e. 'what matters and why'. This includes a consideration of the key attributes of the historic asset itself, and then considers:
- The physical surroundings of the asset, including its relationship with other historic assets; and
 - The way in which the asset is appreciated.
- 2.9. Step 3 (where appropriate) is to assess the effect of the proposed development on the significance of historic assets through consideration of the key attributes of the proposed development in terms of its:
- Location and siting;
 - Form and appearance;
 - Additional effects; and

-
- Permanence.

2.10. Step 4 is to maximise enhancement and minimise harm through appropriate design and mitigation, and Step 5 refers to making and documenting the decision and monitoring outcomes.

2.11. These stages have been discussed further in Section 4. The settings assessment presented in this report includes consideration of Stage 1 to 3, which are the steps normally undertaken to inform the planning process. Stage 3 considers potential impact for the proposed development of a solar park.

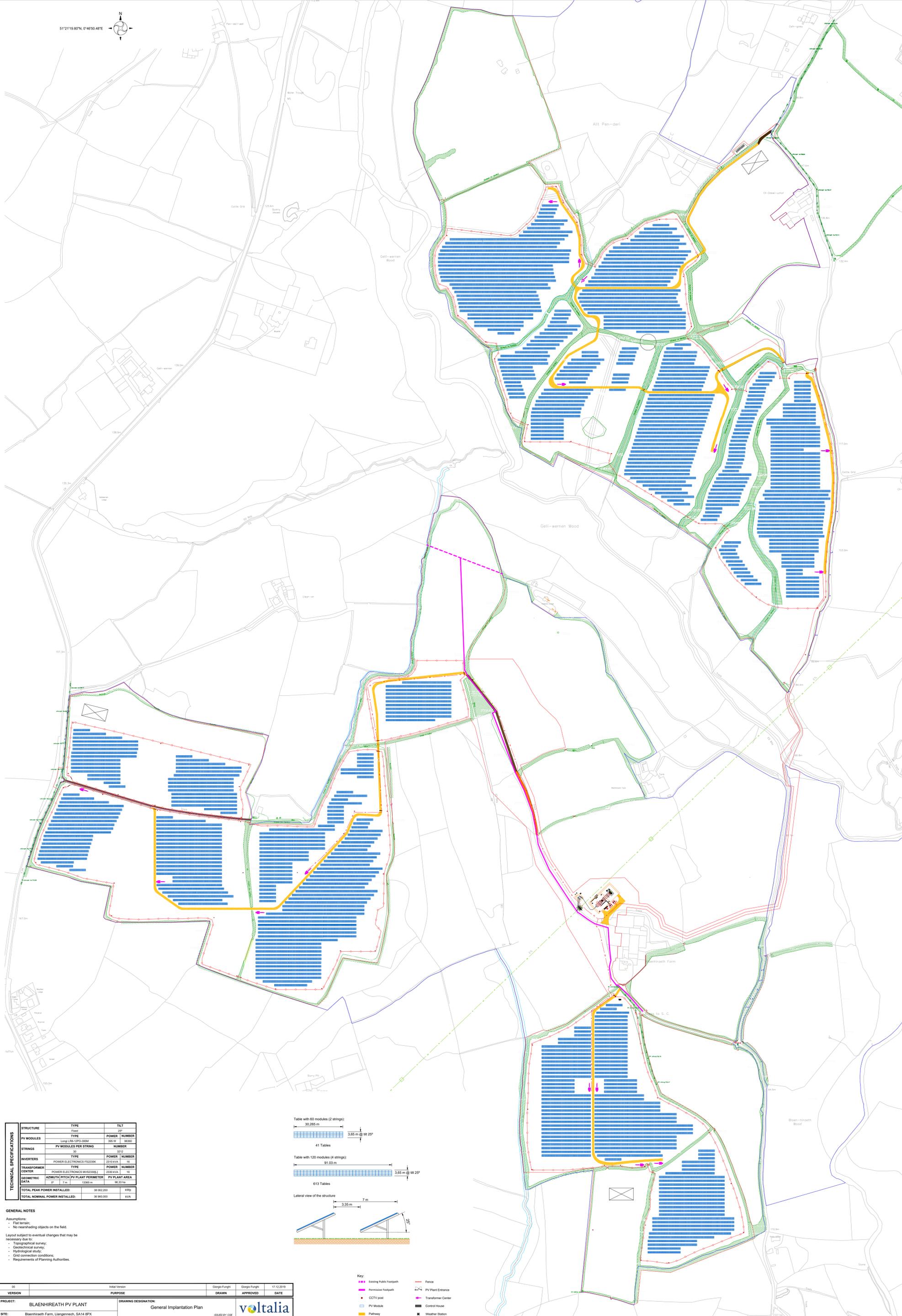
3. THE PROPOSED DEVELOPMENT

- 3.1. The proposed development comprises a solar park including strings of solar panels, substation, a perimeter fence, and a cable route to the substation as shown on Fig. 2.
- 3.2. The area within the proposed development site would contain rows of ground mounted photovoltaic panels, standing 2.75m off the ground on posts c. 6m apart. The post will intrude to c. 1.5m in depth. The arrays and transformers will be surrounded by a 2m high deer fence. Transformers will be constructed upon concrete slabs and will be a maximum height of 2.24m. The single main substation compound will be positioned adjacent to the overhead pylon to the north west of the Blaenhiraeth Farm outbuildings, requiring the routing of cabling through the Grade II Listed Bridge across Afon Moralis, to link the northern and southern elements of the scheme. Structures associated with the substation will be no higher than 3.87m.
- 3.3. In regard to the Grade II Listed Bridge, the main aspect of the development constitutes the insertion of the cable along the route of the road which crossed over the Bridge. The chosen methodology for the installation of the cable has been carefully designed to ensure that there is no impact to the historic fabric of the Grade II Listed Bridge, as detailed below.
- 3.4. Currently no intrusive investigation has been carried out to determine the extent of the surviving historic fabric beneath the modern road surface of the Bridge, which currently comprises as Asphalt surface. However, at the pre-commencement stage of development a conditional survey of Grade II Listed Bridge will be conducted to determine the depth of the modern and historic fabric at the crown of the bridge. If the results of the survey identify that fabric depths do not enable the intended method of installation to avoid impact with the historic fabric, then an alternative method will be implemented, as detailed below.

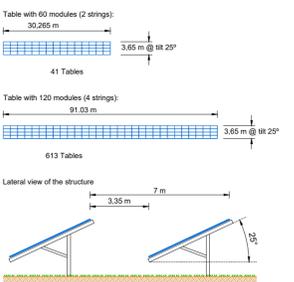
Preferred methodology for installing the cable across the Grade II Listed Bridge

It is proposed to route 3no. 11kV triplex cables and one communication cable over the Grade II Listed Bridge as shown in Fig. 3, which shows an indicative section drawing of the Bridge. It will be a contractual requirement that the method below is followed by the contractor, to ensure that the construction work results in minimal

51°21'19.807N, 0°46'50.48E



TECHNICAL SPECIFICATIONS			
STRUCTURE	TYPE	COL	TLT
	Fixed	25°	
PV MODULES	TYPE	POWER	NUMBER
	Long Life (LPO-3999)	395 W	9630
STRINGS	PV MODULES PER STRING	NUMBER	
	30	3212	
INVERTERS	TYPE	POWER	NUMBER
	POWER ELECTRONICS FS220R	2310 kVA	16
TRANSFORMER	TYPE	POWER	NUMBER
	POWER ELECTRONICS MVS230B1	2330 kVA	16
CENTER	POWER ELECTRONICS MVS230B1	PV PLANT AREA	
GEOMETRIC DATA	AZIMUTH (PITCH) PV PLANT PERIMETER	16.32m	
	0° (25°)	1336m	
TOTAL PEAK POWER INSTALLED:	38 960.000	kVA	
TOTAL NOMINAL POWER INSTALLED:	38 960.000	kVA	



- GENERAL NOTES**
- Assumptions:
 - Flat terrain;
 - No overshadowing objects on the field.
 - Layout subject to eventual changes that may be necessary due to:
 - Topographical survey;
 - Geotechnical survey;
 - Hydrological study;
 - Grid connection conditions;
 - Requirements of Planning Authorities.

- Key:**
- Existing Public Footpath
 - Permissive Footpath
 - CCTV post
 - PV Module
 - Pathway
 - Existing Road
 - Fence
 - PV Plant Entrance
 - Transformer Center
 - Control House
 - Weather Station
 - Construction Compound

VERSION	DATE	DESCRIPTION	DRAWN	APPROVED	DATE
00		Initial Version	Gerorgo Funghi	Gerorgo Funghi	17.12.2019

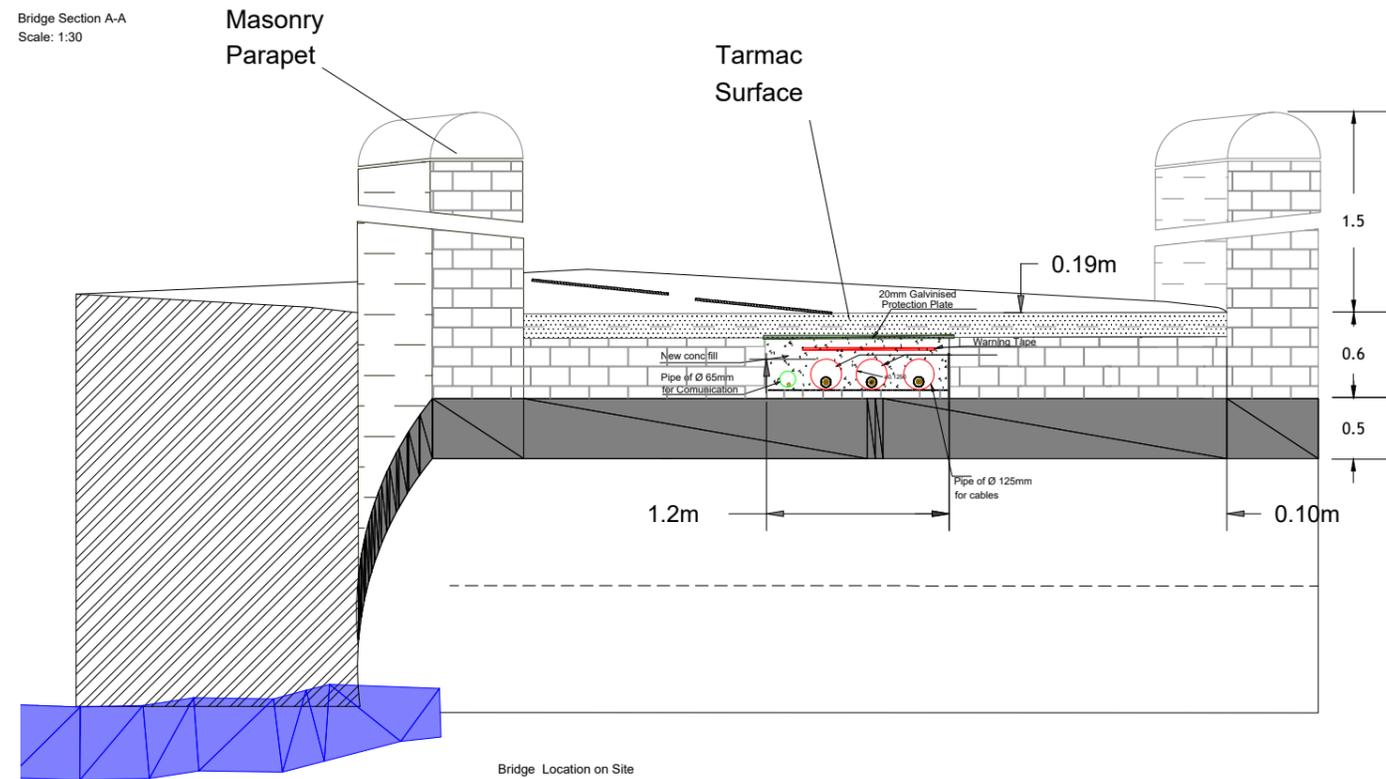
PROJECT: BLAENHIREATH PV PLANT
SITE: Blaenhireath Farm, Llargenrath, SA14 8PX
CLIENT: VOLITALIA
PROJECT N°: PEN01 | **STAGE:** DEVELOPMENT | **SERVICE:** Electrical | **SCALE:** 1:3000 | **FORMAT:** A1

DRAWING DESIGNATION: General Implantation Plan
ISSUED BY: GDF

Bridge Plant
Scale: 1:100



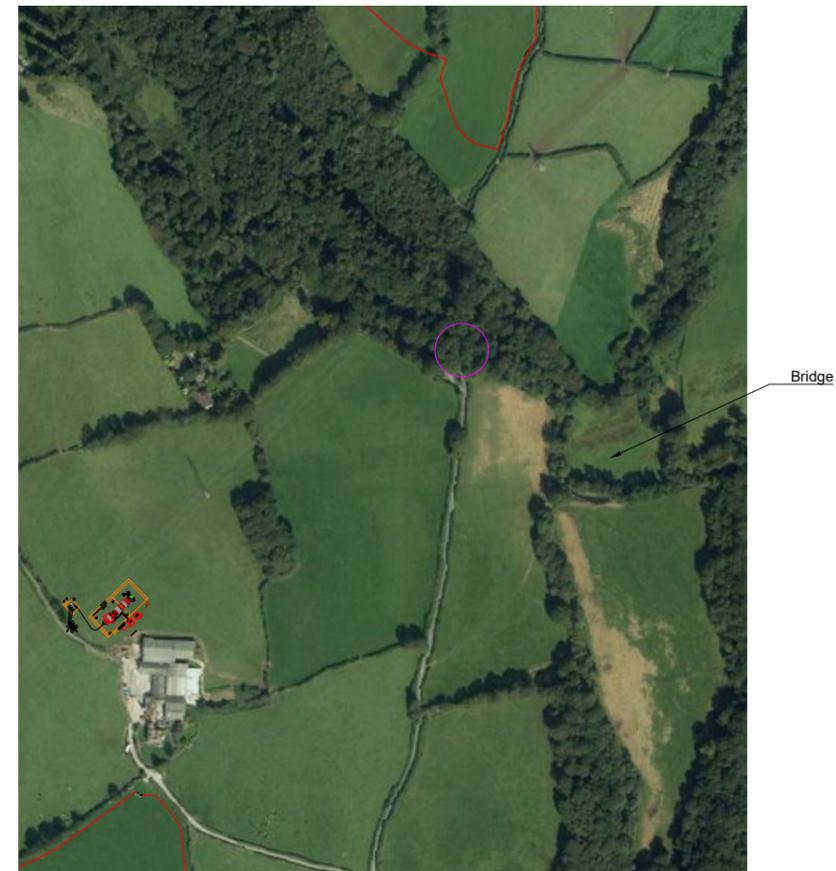
Bridge Section A-A
Scale: 1:30



Bridge Photo
Scale: NS



Bridge Location on Site
Scale: NS



02	Added annotations & moved the cables	Anastasios Katsaros	Anastasios Katsaros	09.11.2020
01	Bridge Topographic Survey	Mário Gonçalves	Henrique Almeida	06.11.2020
00	Initial version	Mário Gonçalves	Henrique Almeida	05.11.2020
VERSION	PURPOSE	DRAWN	APPROVED	DATE
PROJECT: PENDERI		DRAWING DESIGNATION: Bridge Cable Crossing Detail		
SITE: Penderi, Carmarthenshire, United Kingdom		DRAWING CODE: DV_CS_801_03_02		
CLIENT: -		DRAWING CODE: DV_CS_801_03_02		
PROJECT Nº: PEN01	STAGE: Development	SERVICE: Civil & Structures	SCALE: 1:30	FORMAT: A3

impact to the fabric of the listed structure. Any changes are to be approved by the Local Authorities prior to work taking place.

3.5. The contractor will be responsible for briefing and supervising all operatives. Invasive work is largely limited to the concrete saddle, fill material and tarmac road surface.

3.6. Plant and tools will be selected to minimise vibration levels and any vibration created by the works will be considerably less than that caused by vehicle loading in normal use.

3.7. The following methodology is proposed:

1. Close the road and divert all traffic as agreed with the local Highways Authority.
2. Carry out a conditional survey of the Bridge structure including all masonry and parapets and prepare a full photographic record for submission to Carmarthenshire County Council. Whereby the condition survey will involve intrusive works to the Bridge, Listed Building Consent will be required.
3. Carefully drill a series of 16mm pilot holes to confirm the depth of the road makeup at the crown, measured from the top surface of the tarmac to the top of the masonry arch. A depth of approximately 350mm is estimated at the crown. It is at this stage that the alternative methodology as presented below will be implemented if the makeup of the bridge does not allow for a 350mm depth of modern fabric. If 350mm of modern fabric is present the installation will continue as below.
4. Using a diesel powered self-propelled floorsaw, make a series of parallel cuts along the line of the trench at 75-100mm (maximum) centres in an area of 1.2m width (as shown in Fig. 3). Blade cutting depth to be carefully set to keep at least 50mm clear from the masonry arch crown below. Any final material to be removed over the stone arch to be carefully de-laminated and removed using hand tools. This work will be subject to an archaeological watching brief to ensure preservation by record of any historic fabric disturbed.
5. Break out the road surface and existing concrete using a small handheld 110V electric breaker, proceeding very carefully and slowly to ensure minimal interference with or damage to the masonry structure beneath.

6. Outside of the area of the new steel coverplate, breaking is to be done using a handheld pneumatic jack hammer to a depth of 350-400mm depending on findings in item 3 above. Arisings to be removed by a 1t excavator. (No other vehicle traffic will be allowed onto the Bridge).

7. Lay pre-formed galvanised mild steel trunking for electric cables in trench, bedded on 50mm lean mix sand and cement blinding and separation membrane over the masonry crown.

8. Backfill the trench with concrete to the specification agreed with the County Engineer.

9. Place galvanised mild steel cover plate in position using a HIAB lorry which will be parked on the Bridge approach but will not drive over the arch structure. The steel coverplate is to be set to finish flush with top of existing concrete Bridge saddle.

10. Road to remain closed for approved curing period.

11. Lay 100mm tarmac wearing course and make good.

12. Clear site of any debris or waste with any historic fabric to be retained for further analysis.

13. Carry out a post construction conditional survey of Bridge structure including all masonry and parapets and keep a full photographic record. All records to be submitted to Carmarthenshire County Council.

3.8. This preferred method will result in physical work to the Grade II Listed Bridge which has the potential to impact upon the fabric of the Bridge, and thus Listed Building consent will be required whereby this method is employed.

Alternative methodology for installing the cable across the Grade II Listed Bridge

3.9. Whereby the make up of the road does not contain 350mm of modern road surface, an alternative method for the installation of the cable will be employed so that there is no harm to the historic fabric of the bridge.

3.10. This alternative method for the installation of the cable is for a trenchless crossing beneath the riverbed of the Afon Moralis. If required, the methodology for this work

is provided within the Updated Construction Environmental Management Plan (Appendix 0.1) submitted with the application. This will result in no harm to the fabric of the Grade II Listed Bridge.

- 3.11. This alternative method will result in no work to the Grade II Listed Bridge, and thus Listed Building consent will not be required whereby this method is employed.

Preferred methodology from a heritage perspective

- 3.12. As long as there is no impact to the historic fabric of the Bridge, there is no preference to either methodology from a heritage perspective. However, whereby the condition survey identifies less than 350mm of modern road surface on the Grade II Listed Bridge, the alternative methodology to cable underneath the riverbed is preferred.

4. GRADE II LISTED BRIDGE OVER AFON MORALIS – IMPACT ASSESSMENT

- 4.1. This section considers the setting of the Grade II Listed Bridge in order to determine the potential physical and non-physical effects as a result of the development. This assessment has been undertaken in accordance with the approach outlined in the *Setting of Historic Assets in Wales* (Cadw 2017b).
- 4.2. The Grade II Listed Bridge, henceforth ‘the Bridge’, is an earlier 19th century bridge which crosses the Afon Moralis, forming part of a minor non-turnpiked road linking the turnpiked roads to Llanelli and Llannon, now known as the A4138 and B4306 (Cotswold Archaeology 2019). The Bridge is constructed on rubble masonry with ashlar voussoirs and is two-arch. The main arch is c. 7m span of deep segmental shape, with tall thin voussoirs (Cadw 1999). There is a larger projecting stone as keystone on both upstream and downstream faces. The smaller arch is of c. 2.5m span, with similar shape and detailing. The carriageway is about 3.6m wide between parapets (Photos 1 and 2). The historic Bridge has been subject to modern development, including the resurfacing of the road, under which the historic road surface survives.
- 4.3. The significance of the Bridge is derived from its architectural, evidential, and historic value embodied by its physical form and the survival of historic fabric and elements of post-medieval craftsmanship. Historical (illustrative) value is also derived through its narrative of the development of transportation through this landscape during the 19th century.



Photo 1: View of the Grade II Listed Bridge from the minor road looking south-west



Photo 2: View of the Grade II Listed Bridge from Afon Moralis, looking south

Historic Surroundings

- 4.4. The setting of this Bridge was provided by the Afon Moralis and the unnamed road which crosses over it. The physical and functional location of the river and road provide the historical context and functional use for the Bridge and illustrates the development of this bridge as an access point across the river, positively contributing to its significance. The river, which is edged with trees along the bank forming part of Gelli-wernen wood, and although not a designed feature, contributes to its aesthetic value, enhancing its rural location and focusing views on the bridge itself, due to limited visibility provided by the woodland. This enhances the sensory experience of the Bridge and thus, positively contributing to the significance of the bridge. The fabric of the Bridge itself yields information on past construction methods, providing evidential value and an important positive contribution to its significance.
- 4.5. The wider setting is provided by this woodland to the north and the surrounding agricultural fields. This provides the wider context for the Bridge as a means of crossing the river within a rural landscape, however, the elements of the wider setting do not contribute to the key historic, evidential and aesthetic values which contribute to the significance of the Bridge.
- 4.6. The experience of the Bridge is largely anchored in its secluded nature, accessed through the road which travels over it. As such, key views would have been along this route, of which only short distance views of the Bridge were available due to the sinuous nature of the road in this location and the presence of trees within the Gelli-wernen wood, which blocks any long-distance views. This adds to the aesthetic value of the Bridge, accentuating its enclosed character and positively contributing to its significance. The view of the Bridge from the river would have likely been a secondary view, as given the shallow nature of this river, it was likely not a key transportation/navigation route.

Current Surroundings

- 4.7. The current setting is largely unchanged from the 19th century, with the functional value of this Bridge as a rural crossing point of a post-medieval route over the Afon still evident as a result of limited modern intervention. The main changes to the historic setting of the Bridge comprise the re-surfacing of the road, which does not change the relationship between the road and Bridge as a route of travel and means of crossing the river, or the fabric of the Bridge itself which embodies

evidential value. As such, the modern additions to the road have a neutral contribution to the significance of the Bridge.

- 4.8. The Bridge is best experienced when travelling along the road, with long distance view still not available as a result of the surrounding woodland and sinuous nature of the road. As such, the historic experience of the bridge is maintained, providing evidential and aesthetic values and positively contributing to the significance of the Bridge.

Contribution of the Site

- 4.9. The road in proximity to the Bridge, which forms part of the Site contributes to the significance of the Bridge through its historical (illustrative) value which provides the functional value and context for the Bridge. However, the remainder of the Site which comprises the surrounding agricultural land to the north, south, and west, does not contribute to evidential, historical, or aesthetic values of the Bridge and therefore does not contribute to its significance.

- 4.10. As such, it is only the elements of the proposed development which are located along the road in proximity to the Bridge which have the potential to affect the significance of this Grade II Listed Bridge. This part of the proposed development comprises the underground cabling which will link the northern and southern sections of the Site.

Physical Effects

- 4.11. The potential impact of directing the cable route through the Bridge has been minimised as far as possible by proposing a method of laying the cables between the historic fabric of the Bridge and the modern road surface. The methodologies described in Section 3 will ensure that these works would cause no impact to the historic fabric of the Bridge, resulting in no change to its historic or evidential value. The preferred methodology will install the cable underneath the surface of the road up to a depth of 350mm which is believed to be within the modern fabric of the bridge, thus resulting in no harm to the historic fabric. Whereby, the condition survey reveals that the modern fabric on the Bridge is less than 350mm, the alternative methodology will be employed which installs the cable beneath the riverbed and will not harm the historic fabric of the Bridge. Thus, the proposed development will result in **no harm** to the Grade II Listed Bridge.

Non-Physical Effects

- 4.12. The setting of the Bridge is provided by the road, which runs across the Bridge itself, and the Afon Moralis. These elements provide the functional context and use of the Bridge, providing evidential and historical value and thus, positively contributing to its significance. The short-distance view along the road, also contributes to the significance of the Bridge through their aesthetic value.
- 4.13. The proposed methodology for the installation of the cabling along the road is for an underground cable. This will not change the functional relationship between the road and the Bridge, and nor will it alter views along the road and the wider landscape. Similarly, the alternative is for the installation of the cabling beneath the riverbed, which again is an underground cable. As such, there will be no meaningful change to the elements to the setting which contribute to the significance of the Bridge. The historical, evidential, and aesthetic values of the Bridge will remain unchanged as a result of the proposed development. As there will be no change to the values which contribute its significance, there will be **no harm** to this designated historic asset as a result of the proposal.

5. CONCLUSION

- 5.1. It is considered that the current Heritage Statement provides a 'proportionate' level of information on the potential heritage effects to inform an application for Listed Building Consent and a planning application (on the basis of the design proposals considered in this assessment). This is in accordance with Regulation 6: '*Heritage Impact Assessments*' in Cadw's 2017 '*Heritage Impact Assessment in Wales*'.
- 5.2. The preferred methodology for the installation of the cable route is to lay the cable over the Grade II Listed Bridge within modern fabric. This option was accepted in principle by the Carmarthenshire Council and CADW during the informal and formal pre-apps. Likewise, the option of undertaking directional drilling under the bridge is not viable due to the ground conditions. However, an alternative option to lay the cable beneath the riverbed has been provided whereby the preferred method will result in no harm to the Grade II Listed Bridge.
- 5.3. The use of methodology for the installation will be determined by a pre-commencement condition survey which will determine the depth of modern material on the Grade II Listed Bridge. Whereby the modern material is greater than 350mm the preferred option will be undertaken. However, whereby modern material is found to be less than 350mm, the alternative option for cabling underneath the riverbed will be undertaken. This will ensure that the installation of the cable does not impact on the historic fabric of the Bridge.
- 5.4. The assessment has identified that the significance of the Grade II Listed Bridge across Afon Moralis is derived from its evidential, historic, and aesthetic value embodied in its physical form. The main contributing elements to this significance comprise the minor road which crosses over the bridge and the Afon. On review of the design proposals, it is considered that whereby the appropriate method of installation is carried out following the results of the condition survey, the proposals would have no impact to the historic fabric on the bridge. This will result in no change to the bridge's historical or evidential value and as such, the proposed design will result in **no harm** to the Grade II Listed Bridge.
- 5.5. As such, the proposed development is compliant with paragraph 6.1.10 of the Planning Policy Wales Edition 10. Intrusive works to the listed bridge will be subject to a listed building consent. It is recommended that if planning permission and listed building consent are granted, then this methodology be implemented as a Condition.

6. REFERENCES

- Cadw 1999 *Full Report for Listed Buildings: Bridge over Afon Morlais (partly in Llannon Community)*, reference number 21098. <http://cadwpublic-api.azurewebsites.net/reports/listedbuilding/FullReport?lang=en&id=21098>
- Cadw 2011 *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment in Wales*
- Cadw 2017 *Managing Setting of Historic Assets in Wales*
- Cadw 2017a *Setting of Historic Assets*.
- Cadw 2017b *Heritage Impact Assessment in Wales*.
- Carmarthenshire County Council (CCC) 2014 *Carmarthenshire Local Development Plan*.
- Cotswold Archaeology 2019 *Heritage Assessment: Land at Penderi/Blaenhiraeth Farm Carmarthenshire*
- Chartered Institute for Archaeologists 2020 *Standard and Guidance for Historic Environment Desk-Based Assessment*
- Historic England 2011 *Historic Environment Good Practice Advice in Planning: Note 3: The Setting of Heritage Assets*
- Planning (Listed Buildings and Conservation Areas) Act 1990 Act of UK Parliament
- Welsh Government 2017a *Technical Advice Note 24: The Historic Environment (TAN24)*
- Welsh Government 2017b *Setting of Historic Assets in Wales*
- Welsh Government 2017c *The Planning (Listed Buildings and Conservation Areas) (Wales) (Amendment No2) Regulations*
- Welsh Government 2018 *Planning Policy Wales Edition 10*

APPENDIX 1: HERITAGE STATUTE POLICY & GUIDANCE

Heritage Statute

Historic Environment (Wales) Act (2016)

The Historic Environment (Wales) Act was passed by the National Assembly for Wales in February 2016 and became law after receiving Royal Assent in March 2016. It amends the two pieces of UK legislation - the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990 – that currently provide the framework for the protection and management of the historic environment in Wales.

The Historic Environment (Wales) Act 2016 has three main aims:

- To give more effective protection to Listed Buildings and Scheduled Monuments;
- To improve the sustainable management of the historic environment; and
- To introduce greater transparency and accountability into decisions taken on the historic environment.

The amendments to the Planning Act 1990 include an extension to the definition of a Scheduled Monument, the introduction of enforcement orders to stop unauthorised works to Scheduled Monuments or Listed Buildings, and the formulation of a comprehensive register of parks and gardens of historic interest in Wales and a statutory list of historic place names.

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

Under Section 1(5) of the Act, a structure may be deemed part of a Listed Building if it is:

- (a) fixed to the building, or
- (b) within the curtilage of the building, which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948

Under Section 7 of the Planning Act, *'no person shall execute or cause to be executed any works for demolition of a Listed Building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised.'* Such works are authorised under Listed Building Consent.

Under Section 66

The inclusion of a structure deemed to be within the 'curtilage' of a building thus means that it is subject to the same statutory controls as the principal Listed Building. Inclusion within this duty is not, however, an automatic indicator of 'heritage significance' both as defined

within the NPPF (2019) and within Conservation Principles (see Section 2 above). In such cases, the significance of the structure needs to be assessed both in its own right and in the contribution it makes to the significance and character of the principal Listed Building. The practical effect of the inclusion in the listing of ancillary structures is limited by the requirement that Listed Building Consent is only needed for works to the 'Listed Building' (to include the building in the list and all the ancillary items) where they affect the special character of the Listed building as a whole.

Guidance is provided by Historic England on '[Listed Buildings and Curtilage: Historic England Advice Note 10](#)' (Historic England 2018).

National planning policy and legislation

Planning Policy Wales – Edition 10 (2018)

Chapter 6 of Planning Policy Wales (PPW) acknowledges the importance of protecting the historic environment: encompassing designated historic assets (Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and Special Landscape Areas) and non-designated historic assets (including buried archaeological remains). Paragraph 6.1.7 states 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.'*

Further key objectives have been extracted and reproduced below, although the full section on heritage provided in the policy document should be viewed in addition.

'6.1.6 The Welsh Government's specific objectives for the historic environment seek to:

- *protect the Outstanding Universal Value of the World Heritage Sites;*
- *conserve archaeological remains, both for their own sake and for their role in education, leisure and the economy;*
- *safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved;*
- *preserve or enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous;*

-
- *preserve the special interest of sites on the register of historic parks and gardens; and*
 - *protect areas on the register of historic landscapes in Wales.'*

'6.1.9 Any decisions made through the planning system must fully consider the impact on the historic environment and on the significance and heritage values of individual historic assets and their contribution to the character of place.'

'6.1.13 Applicants for listed building consent must be able to justify their proposals, show why the alteration or demolition of a listed building is desirable or necessary and consider the impact of any change upon its significance. This must be included in a heritage impact statement, which will be proportionate both to the significance of the building and to the degree of change proposed.'

Technical Advice Note 24 – The Historic Environment (2017)

A series of Technical Advice Notes (TAN) provide supplementary planning guidance to PPW. TAN 24 replaces the former Welsh Office Circulars 60/96 (Planning and the Historic Environment: Archaeology), 61/96 (Planning and the Historic Environment: Historic Buildings and Conservation Areas) and 1/98 (Planning and the Historic Environment: Directions by the Secretary of State for Wales); and provides guidance on how various aspects of the historic environment should be considered.

Local planning policy

Carmarthenshire Local Development Plan (2014)

The Carmarthenshire Local Development Plan (LDP) is Carmarthenshire County Council's statutory development plan, which will guide future planning decisions up to 2021. Policies relevant to the historic environment are as follows:

Policy GP1 Sustainability and High Quality Design

'Development proposals will be permitted where they accord with the following:

It conforms with and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing, elevation treatment, and detailing;

It protects and enhances the landscape, townscape, historic and cultural heritage of the County and there are no adverse effects on the setting or integrity of the historic environment;

Carmarthenshire has a rich historic and cultural heritage. The County's historic buildings, townscape and landscape should be treated as an asset and positively conserved and enhanced for the benefit of residents and visitors alike. Further guidance on the development and preservation of historic and cultural identities can be found within Policy SP13 – Protection and Enhancement of the Built and Historic Environment and the Built Environment section of this Plan.'

Policy SP13 Protection and Management of the Built and Historic Environment

'Development proposals should preserve or enhance the built and historic environment of the County, its cultural, townscape and landscape assets (outlined below), and, where appropriate, their setting. Proposals relating to the following will be considered in accordance with national guidance and legislation.

Sites and features of recognised Historical and Cultural Importance;

Listed Buildings and their setting;

Conservation Areas and their setting;

Scheduled Ancient Monuments and other sites of recognised archaeological importance.

Proposals will be expected to promote high quality design that reinforces local character and respects and enhances the local setting and the cultural and historic qualities of the plan area.'

Policy EQ1 Protection of Buildings, Landscapes and Features of Historic Importance

'Proposals for development affecting landscapes, townscapes buildings and sites or features of historic or archaeological interest which by virtue of their historic importance, character or significance within a group of features make an important contribution to the local character and the interests of the area will only be permitted where it preserves or enhances the built and historic environment.

6.6.5 Strategic Policy SP13 identifies that historical and cultural features of recognised importance, including Scheduled Ancient Monuments (SAM) will be protected as a reflection

of national policy. However, not all nationally important remains which may merit preservation will necessarily be scheduled. Such remains and, in appropriate circumstances, other unscheduled archaeological remains of local importance and their setting may also be worthy of protection (PPW: Edition 7 Para 6.4.2). In this regard, the above policy seeks to reflect their significance either as locally important sites or as currently un-designated sites worthy of potential national designation.

6.6.6 Reference should be made to the content of PPW: Edition 7 in respect of SAMs. The locations of SAMs are shown on the Proposals Map.

6.6.7 Listed Buildings are determined on the basis of their importance to the nation, either for their architecture or built quality, or for their historic associations. However, there are a large number of other buildings, which whilst not of sufficient quality or importance to be listed, nevertheless make a significant local contribution. In Carmarthenshire, there are potentially large numbers of buildings which could fall into this category. Therefore, whilst it would be inappropriate to afford these buildings the same protection as Listed Buildings, it is still desirable to afford them some protection, for example when they are within Conservation Areas, or affected by development proposals. In this regard, reference is made to appendix 3 and the commitment to prepare SPG on Locally Important Buildings.

6.6.8 Proposals for the alteration or extension of a building of local importance will be expected to retain and conserve features of historic or architectural interest. Proposals impacting on, or affecting the setting of a building of local importance will be expected to respect its character. In those instances where demolition is granted the council may seek the recording of architectural features and the re-use and recycling of materials in any new development on the site.

6.6.9 Due regard should be had to the impact of any proposal on the distinctiveness, integrity or setting of the feature, landscape, townscape or building.'

Heritage impact assessment

Regarding the need for heritage impact assessment for the purposes of planning, TAN 24 notes:

*'Heritage impact assessment is a structured process that enables the significance of a designated asset to be taken into account when considering proposals for change. **Heritage impact assessments should be proportionate both to the significance of the historic asset and to the degree of change proposed and should include sufficient information***

to enable both the significance of the asset and the impact of change to be understood. The results of the heritage impact assessment should be summarised in a heritage impact statement which must form part of any listed building consent, conservation area consent and, when requested, scheduled monument consent applications. ...

It is for the applicant to provide the local planning authority with sufficient information to allow the assessment of their proposals in respect of scheduled monuments, listed buildings, conservation areas, registered historic parks and gardens, World Heritage Sites, or other sites of national importance and their settings. These principles, however, are equally applicable to all historic assets, irrespective of their designation.’ (2017, 8–9)

In 2017, Cadw published ‘Heritage Impact Assessment in Wales’; which sets out the general principles to consider when planning changes to historic assets and applying for Listed Building, Conservation Area and Scheduled Monument Consent.

Significance

Conservation Principles (2011)

In 2011, Cadw published ‘Conservation Principles for the Sustainable Management of the Historic Environment in Wales’ ; which provides the basis upon which Cadw discharges its statutory duties, makes decisions, or offers advice about changes to historic assets; but should also be used by others (including owners, developers and other public bodies) to assess the potential impacts of a development proposal on the significance of any historic asset/assets and to assist in decision-making where the historic environment is affected by the planning process.

‘Conservation Principles’ states that:

‘The significance of an historic asset [defined as ‘individual historic features, archaeological sites and historic buildings as well as the landscapes in which they are found... to which people have given a distinctive historical association or identity’] embraces all of the cultural heritage values that people associate with it, or which prompt them to respond to it. These values tend to grow in strength and complexity over time, as understanding deepens and people’s perceptions evolve’ (2011, 10).

Four categories of value are identified: i) evidential (archaeological); ii) historical (illustrative and/or associative); iii) aesthetic; iv) communal. Significance is derived from a combination of one or more of these values.

Evidential value: This derives from those elements of an historic asset that can provide evidence about past human activity, including its physical remains or historic fabric. These may be visible and relatively easy to assess, or they may be buried below ground, under water or be hidden by later fabric. These remains provide the primary evidence for when and how an historic asset was made or built, what it was used for and how it has changed over time. The unrecorded loss of historic fabric represents the destruction of the primary evidence.

Historical value: An historic asset might illustrate a particular aspect of past life or it might be associated with a notable family, person, event or movement. These illustrative or associative values of an historic asset may be less tangible than its evidential value but will often connect past people, events and aspects of life with the present. Of course the functions of an historic asset are likely to change over time and so the full range of changing historical values might not become clear until all the evidential values have been gathered together. Historical values are not so easily diminished by change as evidential values and are harmed only to the extent that adaptation has obliterated them or concealed them.

Aesthetic value: This derives from the way in which people draw sensory and intellectual stimulation from an historic asset. This might include the form of an historic asset, its external appearance and how it lies within its setting. It can be the result of conscious design or it might be a seemingly fortuitous outcome of the way in which an historic asset has evolved and been used over time, or it may be a combination of both.

Communal value: This derives from the meanings that an historic asset has for the people who relate to it, or for whom it figures in their collective experience or memory. It is closely linked to historical and aesthetic values but tends to have additional or specific aspects. Communal value might be commemorative or symbolic. For example, people might draw part of their identity or collective memory from an historic asset, or have emotional links to it. Such values often change over time and they may be important for remembering both positive and uncomfortable events, attitudes or periods in Wales's history. Historic assets can also have social value, acting as a source of social interaction, distinctiveness or coherence; economic value, providing a valuable source of income or employment; or they may have spiritual value, emanating from religious beliefs or modern perceptions of the spirit of a place.

Setting

All historic assets have a setting, which can be defined as: *'The surroundings in which an historic asset is experienced, its local context, embracing present and past relationships to the adjacent landscape'* (Cadw 2011, 38). Elements of setting may make a positive or negative contribution to the significance of an asset (as articulated through the constellation of one or more of the four values identified above, may affect the ability to appreciate that significance, or may be neutral. Setting is not a historic asset in its own right but has value derived from how different elements may contribute to the significance of a historic asset. Setting comprises visual aspects, spatial associations and historic relationships.

Setting of Historic Assets in Wales (2017)

In 2017, Cadw published 'Setting of Historic Assets in Wales'; which presents a five-step methodology for assessing the impact of change or development within the setting of historic assets.

Stage 1 is to identify which historic assets and settings may be affected by proposed change or development.

Stage 2 is to identify the key factors relating to setting that contribute to the significance of each historic asset (with assessing significance explained in 'Conservation Principles'; see above).

Stage 3 is to evaluate the potential impact of change or development within the setting of a historic asset. It is noted that the assessment and evaluation should be proportionate to the likely impact of the proposal.

Stage 4 is to consider options to mitigate the impact of a proposed change or development.

The assessment should be documented *'in a written report which is understandable to non-specialist readers'* (Cadw 2017, 9).

The settings assessments presented in this report comprised the undertaking of stages 1, 2 and 3 only.

Impacts

Paragraph 6.1.5 of Planning Policy Wales states that:

'The historic environment can only be maintained as a resource for future generations if the individual historic assets are protected and conserved. Cadw's published Conservation

Principles [Cadw 2011; see above] highlights the need to base decisions on an understanding of the impact a proposal may have on the significance of an historic asset.'

Cadw's 'Heritage Impact Assessment in Wales' states that:

'Your heritage impact statement will need to demonstrate that you have considered the potential impact of your preferred approach. You will need to show how your proposed work will sustain or enhance the significance of your historic asset, including potential benefits and any harm.' (2017, 9)

www.voltalia.com/en
