



Nant Mithil Energy Park, Powys.
PEDW DNS Application Ref: DNS CAS-01907-D7Q6Z1.

CPRW-RE-think Chapter 5 on

Heritage

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Evidence by CPRW-RE-think on:

Heritage

This chapter considers the Historic Environment in and around Nant Mithil Energy Park.

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1. INTRODUCTION

- 1.1. The impact of wind turbine placement on each Historic Monument in and around Nant Mithil Energy Park is described in detail. The result of the Applicant's approach is that the impact upon every single listed building in the core 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 contradicts policy and guidance and in this respect the assessment is entirely deficient.
- 1.2. 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 and unacceptable.
- 1.3. The Inspector will also be aware of paragraph 314A of the Town and Country Planning Act 1990 requiring Welsh Ministers to have special regard to the desirability of preserving the setting of a listed building in considering whether to grant permission for this development.

2. SCHEDULED MONUMENTS

CWM BWCH ROUND BARROW PAIR (RD255), GREAT RHOS BARROW (RD254) AND SHEPHERD'S TUMP BARROW (RD253)

- 2.1. Prehistoric barrows were intended to be seen. They were frequently placed with great care on higher ground so that they would dominate the view when seen from elsewhere, and these four barrows do exactly that. The pair of barrows above Cwm Bwch and the Great Rhos Barrow are clearly intended to be seen from the ridge to the west followed by the ancient routeway over the high ground of Radnor Forest from Llanfihangel Rhydithon to the valley of the Black Brook. Today, even though they are a little over a metre in height, they are readily seen from the driveway from where it passes a small barn at SO158653 and they continue to dominate the ridgeline as the route passes over Cefn-y-grug for a distance of at least 1.5km. This location has been chosen deliberately – had the barrows been located on the highest point of Great Rhos they would not have been visible from the driveway. This deliberate location slightly away from the higher ground to increase visibility is sometimes referred to as 'false cresting'.
- 2.2. Dr Neal Johnson included these monuments in his study of round barrows which gained him his doctorate, and says of the Great Rhos Barrow: *"It is in a false crested position, probably to be viewed from the north-south trending ridge lower to the west. The views are far reaching and extensive in an arc from the north to the south. The mass of Great Rhos rises to the east and dominates that perspective."*¹

¹ Johnson, N, *Early Bronze Age Round Barrows of the Anglo-Welsh Border*, BAR British Series 632 (2017), p. 105.

- 2.3. At present, the purpose of the location of the Cwm Bwch and Great Rhos barrows is easily understood as they form clearly discernible features on a skyline that has remained largely unchanged in the four thousand years since their creation. Any appreciation of that location will be lost if the proposed development goes ahead. The view from the driveway will simply be blocked at regular points (for example by turbines T25 and T22), and the barrows will be dwarfed by massive machines around them far higher than the barrows themselves.
- 2.4. The Applicant has assessed the impact on Cwm Bwch Round Barrow Pair and on Great Rhos Round Barrow as *medium*, leading to a moderate effect (Historic Environment Assessment , Environmental Statement, App. 6.1, (ES App 6.1), 5.25-5.48), which, given the discussion above, downplays the impact. The criteria for the level of change is given in ES App. 6.1, p11, table 2.2. The construction of these turbines is considered by the Applicant to lead to a *medium level* of change but given the sheer scale of what is proposed the change must be *substantial* and the impact is therefore *large* and the effect *major*.
- 2.5. In their letter of 24 June 2024 CADW (PAC Report, App 2) said that they disagreed with the level of impact with respect to Shepherd's Tump given in the pre-application consultation documents. This is because in the proposal at the time T25 was proposed to be located between Shepherd's Tump and the Cwm Bwch barrows (RD255). Accordingly, T25 has been relocated 50m to the south-east and the result can be seen ES, vol. 4, figs 6.8f and j, and indeed, the Cwm Bwch barrow pair might be spotted by a keen observer somewhere between turbines 23, 24 and 25, although the looming presence of T23 might present something of a distraction and (depending on wind direction) the blades of T25 will sweep across the barrow pair.
- 2.6. But the emphasis on intervisibility distracts from the fact that the significance of these barrows derives from their visibility from the surrounding landscape, and figs 6.8f and j alone are sufficient to demonstrate quite how much that significance will be compromised. Dr Neal Johnson says (in respect of the Radnor Forest barrows generally: "*The barrows are sited such that the principal focus appears to be outwards, towards the wider landscape, and...there appears to be little concern with maintaining visual links with the other constituent monuments*".²
- 2.7. Simply moving a turbine a few metres cannot reduce the impact in any meaningful way.
- 2.8. Shepherd's Tump (RD253) is located on the top of a prominent outlying hill and is evidently intended to be seen from the surrounding landscape, particularly from the west across Cwmaran (as acknowledged in ES, App. 6.1, 4.20) . The effect is apparent from the minor road that leads past Dolau station and up the ridge on the north-west

² Johnson, 105.

side of the valley, from where the barrow can be seen clearly on the top of the hill, and from the top of the ridge all four barrows are discernible. The hill upon which Shepherd's Tump is located stands about 220m above the valley floor and turbines T21 – T24, located behind Shepherd's Tump in that view, will rise a further 205m. If the development were to proceed, the barrow would be little more than a pimple with four turbines immediately behind it, and any sense that the barrow was intended to dominate the skyline would be completely lost. Again, this cannot be described as a 'medium' level of change — the change is *substantial*, the impact is *large* and the effect is *major*.

- 2.9. In view of the above, 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 **large**, not moderate, and the effect is **major**. In any case, a moderate or major adverse significant adverse effect is unacceptable.
- 2.10. While the assessment of the impact on each barrow in turn is valid, it is important to consider the **cumulative effect**. Beyond the enclosed fields in the surrounding valleys, this is a landscape which has changed relatively little, and standing near any of the barrows it is quite possible to consider why men and women four thousand years ago chose to bury their dead in this remote location and raise mounds above them to be seen by people in the land below. If this proposal were to proceed, anyone standing on the high ground above Cwm Bwch would be virtually surrounded by machines that utterly dwarf the barrows and the character of that landscape would be profoundly changed from something that would have been recognisable to the barrow builders into a noisy twenty-first century industrial park. *Policy 18 of Future Wales; The National Plan 2040* requires that there should be no unacceptable adverse impacts on statutorily protected built heritage assets. It would be deeply concerning if the level of harm to the heritage of Wales from this proposal was deemed acceptable.

BLACK MIXEN ROUND BARROWS (RD257 AND 256)

- 2.11. The two barrows on Black Mixen are located on the plateau top of Radnor Forest, and unlike the other barrows, do not seem to have been placed with respect to views from the surrounding landscape. Rather, they seem to have been placed to be central to the plateau, with views out in all directions. The existing telecommunications mast and some immature forestry do represent changes to the landscape, but it is still very possible to appreciate the open moorland landscape in which the barrows were originally built. The assessment in App 6.1 (5.74) correctly notes that the presence of turbines would be a notable change to the setting of these barrows and that they will be conspicuous. With respect to views to the west (i.e towards the development), the assessment states that the east facing slope of Harley Dingle and the Great Rhos ridge will still be the dominant features.

- 2.12. Looking at the photomontage given in vol.4, fig 5.30i (viewpoint 5), illustrating the view from the southern barrow westwards (RD257), it is hard to see that the turbines would be anything other than dominant features. The east facing slope of Harley's Dingle is visible, and the Great Rhos ridge is a continuation of the Forest plateau, but they are part of the landscape that will be dramatically changed by the construction of the turbines. This is a *significant change* to a setting that has remained much the same for millennia. This is not a 'slight' alteration of the setting, and the effect must be greater than minor and must be significant and adverse in EIA terms.

THE WHIMBLE, WHINYARD ROCKS AND RED HILL BRONZE AGE BARROWS (RD189, RD190 AND RD191)

- 2.13. The assessment correctly identifies the relationship of these barrows with the Walton Basin as being fundamental, and they are very clearly intended to be viewed from the south-east. The effect is particularly noticeable from Old Radnor, as shown in fig 5.44f (viewpoint 19) where five of the six scheduled barrows can be seen on the ridgeline. But as that figure shows, the blades of T19 would be directly behind the barrow on the Whimble, and turbine 18 will be very obvious slightly to the left. The understanding of that relationship from what is accepted to be a key viewpoint will be compromised by the moving blades of the turbines which dominate the skyline. Moving further north to Pen Offa on Offa's Dyke, fig 5.48a (viewpoint 23), demonstrates that turbine blades will be seen directly behind the whole ridgeline. At the actual location from which that image has been generated, the view is slightly obscured by farm buildings and trees, but the effect will be very noticeable to walkers following Offa's Dyke as they approach the summit of Pen Offa from the south (around SO272633).
- 2.14. It is therefore incorrect to say that "*a fundamental aspect of how the siting of these historic assets is understood and appreciated via key views to and from the south and east, will not be affected.*" (para 5.67). A fundamental aspect will be very much affected and this has not been taken into account in the assessment of harm (ES App. 6.1, 5.64-5.71).

COMPARISON WITH THE HENDY WIND FARM AND ABEREDW ENERGY PARK PROPOSAL

- 2.15. The Hendy wind farm is now constructed (but not operational) and is a short distance away from the Nant Mithil proposal. In considering the appeal against non-determination of the planning application for the turbines the Inspector said that that scheme would cause unacceptable adverse effects on the landscape and on SAMs (APP/T6850/A/17/3176128, Inspector's Report para 409). CADW concurred and while the Welsh Minister allowed the appeal she did not disagree with the Inspector's assessment of the level of harm.
- 2.16. In the case of Hendy the nearest a turbine was located to a scheduled monument was about 450m (from the Nant Brook Enclosure (RD147)) and there were seven turbines

with tip heights of 110m. In the case of the current Nant Mithil proposal, a turbine with a tip height of 205m (T20) is only 130m from the Cwm Bwch Round Barrow Pair, and another turbine is only 220m from the Great Rhos Barrow. Unlike the scheduled monuments impacted by the Hendy proposal, these barrows will be surrounded by turbines. It would be hard to understand why the impact on heritage assets that would occur with respect to the current proposal would be considered acceptable where that from Hendy was considered unacceptable.

- 2.17. The Applicant has carried out the statutory consultation with respect to their proposed Aberedw Energy Park. In that case, Bronze Age barrows are again proposed to be almost surrounded by turbines of a similar size to those proposed at Nant Mithil but located rather further away from the affected barrows than is the case at Nant Mithil. In the Aberedw case the Applicant's consultants, LUC, who are the same consultants advising on Nant Mithil, concluded that the effect there would be major adverse (Bute Energy, Aberedw Energy Park, App. 6.1: Historic Environment Assessment, 5.27). The two situations are very similar and it is not clear why the two assessments differ.

3. LISTED BUILDINGS

- 3.1. The impact on listed buildings through the effect on their setting is assessed in **table D2** of App. 6.1. While some of the buildings have been screened out as having no theoretical visibility with the Proposed Development, around 100 listed buildings have been screened out on the grounds that their setting does not extend as far as the proposed development, even though it will be theoretically visible. The ES concludes that there is in fact no effect at all on any listed buildings in the core area. This remarkable approach is not supported by any evidence or any explanation as to why the setting ends somewhere between the listed buildings and the development site. The approach is largely confined to listed buildings. The setting of Llandrindod Wells Conservation Area, for example, around 10km away, is considered to extend as far as the development site (App 6.1, 4.125) whereas the setting of a listed building in Llandegley, about 1.8km from the nearest turbine, is not.
- 3.2. Setting is defined by CADW: *"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."*³
- 3.3. CADW also advises that *"Setting often extends beyond the property boundary of an individual historic asset into a broader landscape context."*⁴

³ *Setting of Historic Assets in Wales*, CADW (May 2017).

⁴ (p1).

- 3.4. While it has not been possible for us to assess the impact on all listed buildings, and it may indeed be true that the visibility of the proposed development is simply theoretical for some of them, two examples can be used to demonstrate how misguided the approach adopted by the Applicant actually is.

THE PALES, LLANDEGLEW

- 3.5. Land was gifted to the Quakers for a burial ground at the Pales in 1673, and the remote location was probably chosen in response to the persecution suffered by Radnorshire Quakers. Further land was acquired to build a meeting house and construction of the meeting house started around 1745. The meeting house was in use by Quakers for over three hundred years and has recently been transferred to the ownership of Addoldai Cymru (the Welsh Religious Buildings Trust), who note on their website that "*the natural beauty of the surroundings, and an abiding spiritual atmosphere are valued contributions.*"⁵ The exceptional heritage significance of the building and its importance for the Welsh Quaker movement is reflected in its Grade II* listing.
- 3.6. In 2016 a project to assess Quaker meeting houses in Britain started, jointly commissioned by Historic England and Quakers in Britain.⁶ The project was extended to Wales and the Pales was included in the assessment. In the statement of significance, the report on the Pales said: *Its unspoilt rural setting adds to its peaceful atmosphere and spiritual significance.* In the assessment of the meeting house in its wider setting it states: *The remote meeting house lies on the south-east side of a steep hill with spectacular open views of the surrounding hills to the south and east.*
- 3.7. As CADW says, historic assets "*may have spiritual value, emanating from religious beliefs or modern perceptions of the spirit of a place*" (CADW *Conservation Principles for the sustainable management of the historic environment in Wales* (2011), 17), and this is absolutely true of the Pales where the setting so evidently contributes to its significance.
- 3.8. The views from the meeting house are indeed spectacular and the view of the Applicant that the setting ends somewhere between the Pales and the development site is obviously wrong. In an arc swinging from the east to the south, the enclosed farmland on the lower ground is set against the backdrop of Radnor Forest (fig.1). These are "*the surroundings in which it is understood, experienced and appreciated*", to quote CADW again. This is a landscape that has changed little since the eighteenth century and it would have been readily recognised by the Quakers who built the meeting house.

⁵ <https://welshchapels.wales/the-pales/>.

⁶ (<https://heritage.quaker.org.uk/>)

- 3.9. If the proposed development were to go ahead, the landscape would be transformed. Most of the turbines would be clearly visible from the Pales, and the setting would largely be one dominated by industrial electricity generation. Given the acknowledged contribution made by the setting to the significance of this remarkable building, this cannot be considered acceptable.

Fig. 1 The Pales in its setting.

(The Meeting House is the slightly lower (thatched) building to the left)



ST TECLA, LLANDEGLEW

- 3.10. The Church of St Tecla in Llandegley is listed at Grade II, together with the churchyard. Like most churches, St Tecla is aligned east-west, and the key direction for churches is east. The altar is at the east end of a church and gravestones usually face that direction, traditionally because that is the direction from which Christ will appear on the day of judgment. Directly east of St Tecla's stands the hill called Foel, around 240m higher than the church. It is without doubt a landscape feature in the setting of the church, and the 200m high turbine T14 will stand right on it, very visible and obviously within the setting of the church and graveyard (fig.2). But the assessment in Table D2 says that the setting of the church does not extend that far and so there will be no impact. This contradicts the definition of setting given in the CADW guidance. No evidence is offered as to why that definition does not apply here, or why (or indeed where) the setting of St Tecla's stops short of the surrounding landscape.

- 3.11. The rural setting of the church contributes to the significance, and the proposed development will introduce a huge modern intrusion into that setting.

Fig. 2: The listed church and graveyard of St Tecla in its setting, facing east, with Foel beyond. Turbine T14 would be located on the top of the hill, and others will be beyond it.



4. CONCLUSIONS

- 4.1. The assessment given in App. 6.1 underplays the impact upon the scheduled Cwm Bwch Round Barrow Pair, Great Rhos Barrow and Shepherd's Tump Barrow. The effect is major not moderate, but in any case, the effect is significant and adverse.
- 4.2. The assessment given in App. 6.1 underplays the impact on the Black Mixen Round Barrows. The effect must be at least moderate and therefore significant and adverse.
- 4.3. The assessment of the impact on the Whimble, Whinyard Rocks and Red Hill Bronze Age Barrows fails to take into account the impacts upon them when viewed from the Walton Basin.
- 4.4. The approach taken by the Applicant with respect to listed buildings is not in accordance with guidance, and the proposed development will have significant adverse impacts on at least two listed buildings (one of which is Gd II*).
- 4.5. The adverse impacts on statutorily protected heritage assets are unacceptable in the terms of *Policy 18 of Future Wales*.

CW
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