

Rhys Spencer
Case Officer
PEDW

PEDW.Infrastructure@gov.wales

Eich cyf/Your ref: **DNS/3261355**

Ein cyf/Our ref:

Dyddiad/Date: 10 January 2022

Dear Rhys

Rhoscrowther Wind Farm

Thank you for your letter of 22 November 2021 consulting us on the above proposed development of national significance (DNS).

Advice

We have significant concerns about the impact on the setting of the listed buildings in the area. However, we consider that if mitigating measures were undertaken, our concerns about the impact would be reduced.

The national policy and Cadw's role in planning are set out in Annex A.

Assessment

Scheduled Monuments

PE059 Corston Beacon Round Barrow

PE064 Wallaston Round Barrows

PE263 Eastington Manor House

Registered Historic Landscape

HLW (D) 3 Milford Haven Waterway

Listed Buildings

6591	Church of St Decumanus Shaft and Base of Churchyard Cross to N of Parish	I
6592	Church	II
6593	Church Hall	II
6594	The Tower at Eastington Manor House Eastington Farmhouse including range of outbuilding to	I
6595	SE	II



The proposed development consists of the construction and operation of three wind turbines with maximum tip height of 135m together with ancillary development comprising substation compound, electricity transformers, control building, new site entrances, access tracks, crane hardstanding, temporary construction compound and associated works.

The previous appeal determined that the impact of the wind farm on the above designated historic assets and their settings were material considerations in the determination of that application and this will still be a case in regard to the current application.

The impact of the windfarm that was refused consent on the registered Milford Haven Waterway Landscape of Outstanding Historic Interest was considered by the production of an assessment, following the processes of the Assessment of the significance of the Impact of Development on a Historic Landscape (ASIDOHL) methodology. This work considered that the impact of that proposed windfarm on the Landscape of Outstanding Historic Interest would be slight and in Environmental Impact Assessment (EIA) terms, not significant. Whilst the current proposals are for a reduced number of turbines, albeit larger ones, the same ASIDOHL assessment has been submitted in support of the application as it is considered that the impact, will be similar. In our opinion, any increased impact on the registered historic landscape caused by the larger turbines will not be sufficient to increase the effect to, in EIA terms, a significant level. We therefore concur with the applicants that that the ASIDOHL submitted with the previous application is appropriate for the current application.

The previous appeal has determined that windfarm in the application area would not have a significant impact on the settings of the scheduled monuments identified above. Even though the turbines proposed in the current application are some 35m higher than those previously proposed, their impact on the settings of these scheduled monument will still not be of a scale to be significant.

Cadw were consulted as part of the statutory pre-application consultation for a development of five windfarms, each being 126.5m to blade tip, on this site in January 2021. At that time it was our opinion that the cultural heritage assessment contained in chapter 8 of the ES had considerably underscored the impact of the proposed development on the settings of the group of listed buildings at St Decumanus Church and rather than a slight adverse impact there was likely to be a moderate/major impact which would be significant. We therefore informed the applicant that the removal of a turbine (number 4 at that time) would reduce the impact of the remaining turbines on the setting of the listed buildings to a level which was just below significant.

The current application has seen Turbine 4 and another one removed so the current application is now for three turbines with associated infrastructure.



However, the height of the three remaining turbines has been increased by some 8.5m. The removal of Turbine 4 from the application is welcomed, but the increased height of the Turbines, especially Turbine 1 is not.

As stated above the removal of Turbine 4, in our opinion, would have made the effect of the remaining turbines on the setting of the listed buildings just below significant. Whilst a short section of the blades of Turbine 1 would have been visible the majority of the blade and the hub would have been concealed by the existing trees, even in winter. However, the proposal to heighten the turbine will expose more of the blade and raise the possibility that the hub will be visible in winter. As such the change in the height of the turbine will increase its impact to moderate and therefore have a significant effect on the setting of the listed buildings and also on the Conservation Area. Consequently, Cadw will object to the proposed development unless the height of the turbines, or at least Turbine 1 is reduced to 126.5m, the height proposed when we were consulted as part of the statutory pre-planning consultation process.

Finally, there may 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 Dyfed Archaeological Trust info@dyfedarchaeology.org.uk.

Yours sincerely,

Jenna Arnold
Diogelu a Pholisi/ Protection and Policy



Annex A

Our role

Details about our role in the DNS process are available [online](#).

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), Conservation Principles for the Sustainable Management of the Historic Environment in Wales, Technical Advice Notes and related guidance.

Chapter 6 of PPW [Planning Policy Wales - Edition 11 \(gov.wales\)](#) 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

