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Your reference

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qA1267557

Dyddiad  
Date

13 December 2018

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Dear [Name Redacted] ,

**TOWN AND COUNTRY PLANNING ACT 1990  
THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (WALES) REGULATIONS  
2016 - WAUNTYSSWG FARM, ABERTYSSWG, RHYMNEY, TREDEGAR**

Thank you for consulting us on the additional information provided by the applicant.

I can confirm that without any mitigation it remains our opinion that the proposed development is likely to have a significantly adverse impact on the setting of the Tredegar Ironworks Cholera Cemetery scheduled monument. I have attached a copy of our full assessment and, in particular, you will note that we consider that it is possible to reduce the adverse impact to a more acceptable level through appropriate mitigation.

For example, the Heritage Desk-Based Assessment Addendum (HDBAA) suggests that the existing fencing around the cemetery has a negative impact on the monument. It is suggested that the replacement of this fence with a facsimile of the original fencing would be beneficial to the setting of the monument and that this would, to some degree, offset any adverse impact resulting from the proposed development. In our opinion this would be appropriate mitigation and should be part of the proposed development plans. However, the new fencing should be paid for directly by the developers and not as part of any proposed community fund as suggested in the HDBAA. If this were done, we would wish to withdraw our objection as the level of impact would be reduced to an acceptable level.

Yours sincerely,

[Signature Redacted]

[Name Redacted]

[Job Title Redacted]

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.  
We welcome correspondence in both English and Welsh.



BUDDSODDWR MEWN POBL  
INVESTOR IN PEOPLE



**Cadw Assessment – Additional Information Provided by the Applicant  
Proposed Solar Park including access and ancillary development at  
Wauntysswg Farm, Abertysswg, Rhymney, Tredegar  
(APP/X6910/A/16/3154384)**

**Tredegar Ironworks Cholera Cemetery**

1. The Heritage Desk-Based Assessment Addendum (HDBAA) has changed the author's (Foundations Heritage) assessment of the impact of the proposed development on the setting of scheduled monument MM287 Tredegar Ironworks Cholera Cemetery following a site visit and the production of the Landscape and Visual Appraisal Addendum (LVAA) which includes photomontages.

2. In providing their new assessment the author's of the HDBAA have relied heavily on photomontages included in the LVAA which show that the proposed development will not be as visible in views from the scheduled monument than they had previously thought. They conclude that *"the visual impact likely to be experienced from the cemetery represents little more than a slight colour change within a very limited area. The lattice tower proposed to be located within the northern boundary of the site is also likely to be difficult to discern at these distances. It is the conclusion of this report, therefore, that the proposals would result in a negligible impact (no appreciable effect on the setting of any asset) tending to a minor adverse impact (slight visual changes to a few key aspects of historic landscape and the settings of any asset)"*.

3. They discuss views towards the scheduled monument noting that it is *"difficult to discern within the landscape, given the presence of far more dominant existing features within it"* and then discuss the role of views in determining the setting of a heritage asset stating that *"whilst it is accepted that this lack of visibility does not in itself divest a heritage asset from its setting (even buried assets may in some cases have a 'setting') it is critically important to note that a setting has no intrinsic value and only comprises a relevant concern where it contributes to the heritage significance of an asset. Visibility therefore does not, in itself, necessarily affect significance and it is possible for a development to be sited immediately adjacent to an asset and in full view without affecting its setting; conversely a development does not need to be visible at all to affect significance. Views into or out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting"*.

4. In our opinion the report fails to fully understand that views are only part of the factors which determine the setting of a monument, which are clearly explained in section 1 of the Welsh Government document "The Setting of Historic Assets in Wales". In particular this document states *"the setting of a historic asset can also include less tangible elements. These may include function, sensory perceptions or historical, artistic, literary and scenic associations"*. In this case, a significant element of the setting of the scheduled monument is the isolation and sense of remoteness, which is the overriding quality of the cemetery as it is experienced today. The ruined farm buildings and dilapidated nature of boundary walling rather than detracting from

the views actually portray to the modern viewers a sense of abandonment, isolation and desolation surrounding the cemetery, thus emphasising the banishment of the buried individuals from the community of Tredegar.

5. The photomontage, which is figure 33 of the LVAA, does show that the visual impact of the proposed development will be less than thought when the original heritage desk-based assessment was prepared. Only a section of the solar panels will be visible and the proposed mast and substation will be seen with rising ground behind it. However, the proposed development will add modern features into the view and this will diminish the feeling of isolation and abandonment surrounding the scheduled monument. It is therefore our opinion that our previous conclusion, which was in accordance with the original heritage desk-based assessment, overstated the impact of the proposed development on the setting of scheduled monument MM287 particularly due to the then perceived high visual impact of the development in the views from the scheduled monument.. However, we do not agree with the revised heritage impact assessment evaluation that the impact would be negligible to minor adverse for the reasons stated above. It is our view that the proposed development will have an adverse impact on the setting of the monument because it will alter the sense of isolation and abandonment which is a major factor in how it is understood, experienced and appreciated. Therefore without any mitigation it remains our opinion the proposed development will have a moderate to high adverse impact on the setting of the scheduled monument.

6. The HDBAA considers that no mitigation is required in respect of the setting of the scheduled monument as, in the opinion of the author, the proposed development will have a negligible impact. As stated above, we disagree with this assessment and in our opinion it would be possible to reduce the adverse impact to a more acceptable level through appropriate mitigation. The HDBAA suggests that the existing fencing around the cemetery, currently comprised of a “*completely out-of-character and visually intrusive modern farm-type fence*” itself has a negative impact on the asset. It is also suggested that the replacement of this fence with a facsimile of the original fencing would be beneficial to the setting of the asset and that this would, to some degree, offset any adverse impact resulting from the proposed development. In our opinion this would be appropriate mitigation and should be part of the proposed development plans. However, the new fencing should be paid for directly by the developers and not as part of any proposed community fund as suggested in the HDBAA.

7. It is therefore our opinion that with the introduction of the mitigation identified above the proposed development will have a moderate adverse impact on the setting of scheduled monument and reduce the impact to a more acceptable level.

Cadw  
12 December 2018