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Dear Harry

## Elwy Solar Energy Farm St Asaph, Denbighshire

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

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

After considering the information submitted with the above Cadw have no objections to the proposed development. A list of potentially effected historic assets are listed in Annex B.

Our Senior Historic Environment Planning Officer has the following comments.

This advice is given in response to an application for the construction of a solar farm at St.Asaph that will be determined by the Welsh Ministers following the Development of National Significance procedures.

A heritage desk-based assessment for the proposed development has been prepared by the Pegasus Group. This has identified the significance of the heritage assets that will be directly affected by the proposed development and also those whose setting will be changed.

When Cadw were consulted on this proposed development as part of the Pre-Application Consultation there were concerns that heritage desk-based assessment had not been completed and that changes to the design of the solar farm had not been considered. The following issues were identified as requiring to be addressed:

- The geophysical survey needed to be completed for the whole development area.
- Further information on the ridge and furrow agricultural system, which had been identified as medieval in date, needed to be provided.

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



- A revised assessment of the impact of the proposed development on the setting of listed Gwernigron Farmhouse, including the temporary construction compound to the south needed to be carried out.

The revised heritage desk-based assessment has provided the required further information

- The geophysical survey has been completed and archaeologically sensitive areas demarcated. In these areas the solar panels will be supported by above ground foundations, which will protect the below-ground archaeological features.
- Further investigation has concluded that the ridge and furrow agricultural system was formed by steam ploughs and is therefore of the modern period. Evidence of steam ploughing is relatively common in Denbighshire and therefore these features are of low significance.
- The revised assessment of the impact of the proposed development on the setting of listed Gwernigron Farmhouse, has demonstrated that the temporary construction compound will not be visible from the primary south facing elevation of the farmhouse and therefore is not in the significant view.

In Cadw's opinion the revised heritage desk-based assessment has now fully considered the impact of the proposed development on the historic environment. We agree with the conclusions of the assessment that the proposed mitigation measures to protect the non-designated archaeological sites are appropriate and their implementation will ensure that the impact on the archaeological sites will therefore not be significant. We also concur with the conclusions that the impact on the settings of scheduled monuments FL004 Rhuddlan Castle and FL015 Twthill and listed buildings Plas Coch, Gwernigron Dovecote, Rhuddlan Castle and Bodelwyddan Castle, along with its' historic park and garden, will be negligible or none. We also agree that the development will have a small impact on the setting of the Grade II Listed Pengwern Hall, which will constitute a small degree of harm, but this will be at the lower end of less than substantial harm to the significance of the listed buildings.

Cadw slightly disagree with the conclusions of the revised heritage desk-based assessment in regard to grade II listed building Gwernigron Farmhouse. In our opinion the construction of the solar farm in the fields surrounding the farmhouse, which were farmed from it, will alter the way it is experienced understood and appreciated. The removal of solar panels from the area immediately to the south of the farmhouses main elevation and principle view, along with the retention of an existing hedgerow and the planting of a new one, does reduce the impact. However the construction compound to the south of the farmhouse, whilst not directly visible in the principle view, will increase noise and movement in the vicinity of the building, although it is noted that this will be removed after the solar farm has been constructed, which will increase the openness of this area. Cadw therefore agree with the conclusions of the assessment that due to the changes to the setting of the Gwernigron Farmhouse the proposed solar farm will cause harm to significance of the listed building. However, in our opinion the impact is of a moderate rather than small scale and therefore will be closer to the middle of the scale of less than substantial harm to the significance of the listed buildings, but this is not a level which will lead to Cadw objecting to the construction of this solar farm.

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.

PPW ([Chapter 6 – The Historic Environment](#)) 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.

## **Annex B**

### **Non-Designated Archaeological Sites**

Cropmarks of a possible medieval field system in the north-eastern corner;  
Possible location of a First World War temporary tented camp in the south-western area;  
A Royal Observer Corps monitoring post in the southwestern area.

### **Scheduled Monuments**

FL004 Rhuddlan Castle

FL015 Twthill (Further and Additional Areas)

### **Listed Buildings**

Grade II Listed Gwernigron Farmhouse and Grade II\* Listed Dovecote, surrounded by the site;

Grade II Listed Plas Coch, located outside the eastern boundary of the site;

Grade II\* Listed building and historic park and garden of Bodelwyddan Castle, c.2km and c.1.1km west of the site;

Grade II Listed Pengwern Hall, c.750m north of the site; and

Grade I Listed Rhuddlan Castle, c.1.8km north of the site.