



XXXX  
Cadw  
Welsh Government  
Ty'r Afon  
Coed Bedwas Road  
Caerphilly  
CF83 8WT

Dear XXXX,

## Our reference

11863c

## Date

31st May 2023

## Address

Atholl Exchange  
6 Canning St,  
Edinburgh  
EH3 8EG  
Tel: 0131 326 0912

## Gaerwen Windfarm post-scoping consultation

In September 2021, RSK submitted, on behalf of RWE Renewables UK Ltd, a Scoping Report for Gaerwen Windfarm, approximately 7 km to the north-east of Y Bala (centred on National Grid Reference: 301561, 339384) across the Denbighshire/Gwynedd county boundary. Since then, LUC have been commissioned to complete the Environmental Impact Assessment (EIA).

Since this time, the project design has evolved. It is now expected to consist of a maximum of nine turbines. The latest layout (potentially subject to further change) is indicated on **Figure 1**. Two of the turbines (numbers 3 and 5 in **Figure 1**) are now intended to be at 200m tip height, with the remainder at 180m maximum tip height. There is also now an indicative access track alignment connecting to the public highway to the north (the access to site was not included in figures within the submitted Scoping Report but was referenced in the Scoping Report text). The grid connection proposals have also evolved and will be subject to a separate consultation letter in the near future.

LUC has reviewed the Scoping Report and Direction in the light of the design evolution process, and considers that the Scoping Direction remains valid, taking into account the potential range of effects of the latest design: the changes to the design, involving a small increase in height to two turbines but removal of 6 turbines out of 15, have not introduced the potential for new effects beyond those considered at scoping stage via the scoping layout. We will assume that Cadw is in agreement with this unless it states otherwise. We have, however, reviewed the proposed EIA methodology and the consultee responses and would seek confirmation that the following amendments are acceptable:

- 1) Screening<sup>1</sup> all designated historic assets out to 10 km<sup>2</sup> from the Proposed Development (the outermost turbine) to identify the potential for setting change to affect their heritage significance. Non-designated assets will be screened out to 5 km.

<sup>1</sup> Screening will be based on a high-level understanding of the historic asset's heritage significance, the contribution that setting makes to that significance, and the likely interaction of the Proposed Development with that contribution. Only where interaction is deemed likely will the historic asset be taken forward and assessed.

<sup>2</sup> RSK suggested out to 2 km for grade II listed buildings, out to 5 km for Conservation Areas, Historic Landscapes, Historic Parks and Gardens and out to 10 km for Registered Historic Landscapes, World Heritage Sites, Grade I and II\* Listed Buildings, Scheduled Monuments.

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Registered in England  
Registered number 2549296  
Registered office:  
250 Waterloo Road  
London SE1 8RD

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Designated historic assets beyond 10 km will be included in the assessment should setting change be likely to result in significant effects.

- 2) Use our own criteria for the assessment, although the wording for this will not be substantially different to that provided by RSK.
- 3) Not using a matrix to determine the significance of effects. Instead, our approach to assessing (and understanding) heritage significance will clearly and transparently accord with the steps set out in the Principles of Cultural Heritage Impact Assessment in the UK (July 2021) guidance document.<sup>1</sup>

It should be noted that in our assessment of effects, it is typically assumed that all tangible historic assets have a high level of sensitivity to physical change, whilst sensitivity to setting change will depend on the extent to which setting contributes to the significance of the asset and its potential interaction with the Proposed Development; all of which will be clearly stated for each asset assessed.

At scoping, the proposed development comprised up to 15 180 m to tip wind turbines and associated infrastructure. However, at present it is for nine wind turbines (two with a tip height of 200 m (T3 and T5) and seven of a tip height of 180m shown on **Figure 1**), with associated infrastructure. This decrease in turbine numbers reflects the reduction of the developable area, with the area of the site to the north of the county boundary within Gwynedd now excluded. This modification owes to various sensitivities in and around the area, including historic assets.

LUC have undertaken a high-level sensitivity analysis to determine which designated historic assets may experience setting change because of the proposed development.<sup>4</sup> In doing so we have identified a number of draft viewpoints from which visualisations will be prepared in order to inform the assessment. These are identified in **Table 1.1** along with a rationale for their inclusion in the assessment. The location of the draft viewpoints are identified on **Figure 1**. A selection of draft wireframes is also included to demonstrate the potential for setting change in relation to some of the key designated heritage assets. These have been generated based on the current design scheme for viewpoint locations identified in **bold** in **Table 1.1**.

It would be much appreciated if you could review these and provide feedback on whether you are content with the historic assets under consideration. We would also appreciate any feedback on perceived key issues.

Yours sincerely

XXXX XXXX

Principal Historic Environment Consultant  
David.Bull@landuse.co.uk

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<sup>1</sup> [https://www.archaeologists.net/sites/default/files/j30361\\_iema\\_principlesofchia\\_v8.pdf](https://www.archaeologists.net/sites/default/files/j30361_iema_principlesofchia_v8.pdf)<sup>4</sup>  
These remain under review as the proposals evolve.

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Table 1.1: Proposed draft cultural heritage viewpoint locations

Viewpoint Ref	Historic Asset Name	Historic Asset Ref:	Proposed visualisation type / rational	Easting	Northing
CH001	Y Gaerwen Enclosure, Llangar	ME091	A wireframe is proposed of the view from the central point of the historic asset west towards the Proposed Development, to include the view north-west towards Caer Euni Camp (ME015). This is intended to demonstrate the prominence of Proposed Development during operation in views from Y Gaerwen Enclosure, Llangar, the putative intervisibility with Caer Euni Camp and to inform the assessment of direct impacts due to setting change.	302694	340688
CH002	Caer Euni Camp	ME015	A wireframe is proposed from the highest point within the hillfort south-east towards the Proposed Development. This is intended to illustrate the prominence of Proposed Development during operation in views from the hillfort, the putative intervisibility with Y Gaerwen Enclosure, Llangar (ME091) and to inform the assessment of direct impacts due to setting change.	300067	341288

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Viewpoint Ref	Historic Asset Name	Historic Asset Ref:	Proposed visualisation type / rational	Easting	Northing
CH003	Caer Euni ridge (Caer Euni Stone Circles and Cefn Caer Euni Round Cairn)	ME040 and ME227	<p>In their response to the scoping report (17/08/22) Gwynedd Archaeological Planning Service (GAPS) requested that potential direct impacts due to setting change to the historic assets on Caer Euni ridge (to the south-west of Caer Euni Camp (ME015)) are included in the assessment. GAPS identified the need for a representative viewpoint from the ridge. CH003 has been chosen as the highest point on the ridge between the two designated historic assets (Caer Euni Stone Circles and Cefn Caer Euni Round Cairn).</p> <p>The proposed wireframe would comprise the view to the southeast towards the Proposed Development from Caer Euni ridge. This is intended to illustrate the prominence of Proposed Development during operation in views from the ridge, and to inform the assessment of direct impacts due to setting change to those historic assets on the ridge to the south-west of Caer Euni Camp.</p>	299049	340772
CH004	Mynydd Mynyllod Enclosure	ME090	<p>A wireframe is proposed of the view from the central point of the enclosure east towards the Proposed Development. This is intended to demonstrate the change to the setting of the enclosure during the operation of the Proposed Development, the putative intervisibility with Y Gaerwen Enclosure (ME091) and to inform the assessment of direct impacts due to setting change.</p>	300230	339904
CH005	Moel Ty-Uchaf Circles	ME013	<p>There is intervisibility between Moel Ty-Uchaf Circles (ME013) and other contemporary prehistoric ritual monuments in the wider landscape, including Tyfos Stone Circle (ME024). This element of the setting of Moel Ty-Uchaf Circles may contribute to its heritage significance.</p>	305602	337165



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Viewpoint Ref	Historic Asset Name	Historic Asset Ref:	Proposed visualisation type / rational	Easting	Northing
			A wireframe is proposed of the in-combination view from the stone circle north-west towards Tyfos Stone Circle (ME024) and the Proposed Development. This is intended to demonstrate the putative intervisibility between the two historic assets, the potential for the change to the setting of Moel Ty-Uchaf Circles during the operation of the Proposed Development, and to inform the assessment of direct impacts due to setting change.		

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