



Craig Y Perthi Solar Farm Resubmission

Environmental Statement

Appendix 8.2 Assessment of Significance of the Impact of the Development on Historic Landscape (ASIDOHL)

Prepared for

RWE

RWE Renewables UK

August 2026
5576-01-ES03-029



Document Control

Revision	Date	Prepared By	Reviewed / Approved By
5576-01-ES03-029	August 2026	Steve Harding	Steve Harding

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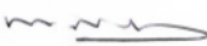
Assessment of Significance of the Impact of the Development on Historic Landscape (ASIDOHL)

Craig Y Perthi Solar Farm, Newport, Wales

Environmental Statement Volume 3

Appendix 8.2

Document status					
Version	Purpose of document	Authored by	Reviewed by	Approved by	Date
01	Draft for internal review	Mick Rawlings	Steve Harding	Mick Rawlings	22/07/2026

Approval for issue		
Mick Rawlings		

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1. STAGE 1: CONTEXTUAL INFORMATION

- 1.1 This report has been prepared by Tetra Tech Consulting Limited (TT) on behalf of RWE Renewables UK (RWE). It sets out the results of an Assessment of the Significance of the Impact of Development on the Historic Landscape (ASIDOHL) regarding the proposed Craig y Perthi solar farm (the Proposed Development) to the east of Newport and within the administrative area of Newport City Council. It is in accordance with relevant guidance, specifically the *Guide to good practice on using the Register of Landscapes of Historic Interest in Wales in the planning and development process: Revised 2nd edition including revisions to the assessment process (ASIDOHL2)* (CCW, Cadw and WAG, 2007).
- 1.2 The Proposed Development represents a revised form of the Craig y Perthi Solar Farm previously promoted by RWE Renewables UK as a Development of National Significance (“DNS”) under reference DNS/3279787 (‘the Previous Application’). The Previous Application was examined by an Inspector appointed by the Welsh Ministers who recommended that planning permission on balance should be refused, with the main grounds being as a result of potential harm to biodiversity, landscape and heritage aspects of the local environment. The Welsh Ministers subsequently issued their decision on 21 October 2025 and refused planning permission.
- 1.3 The Proposed Development is located to the north of, and outside, a registered Landscape of Outstanding Historic Interest (LOHI) in Wales – the Gwent Levels Historic Landscape. This historic landscape is included within the second part of the non-statutory *Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales* (CCW, Cadw and ICOMOS UK, 1998).
- 1.4 The Gwent Levels LOHI is subdivided into a total of 21 Historic Landscape Character Areas (HLCAs), which in some places extend beyond the defined boundary of the LOHI. A small area of land required for the Proposed Development is located within one such HLCA – this is HLCA009 Green Moor.
- 1.5 The *Guide to good practice on using the Register of Landscapes of Historic Interest in Wales in the planning and development process: Revised 2nd edition including revisions to the assessment process (ASIDOHL2)* (CCW, Cadw and WAG, 2007) advises that ‘It is widely accepted that it is difficult to determine precise edges to landscapes (paragraph 7.1) and ‘*The extent of the landscape areas on the Register and Historic Character Areas are, therefore, indicative and advisory only*’ (paragraph 7.6) before going on to state ‘*It will be a matter for the planning or other competent authority undertaking an EIA, or the Public Inquiry Inspector concerned, to determine where a precise edge should be drawn. All the evidence available in the Register, the relevant characterisation report and any relevant work done subsequently should be carefully considered and weighed against the nature and extent of the proposed development and its predicted impact on the landscape area on the Register. The guiding principle is that where drawn edges are required, they should be as consistent as possible with the maintenance of those historic elements or characteristics that demonstrate the outstanding or special interest of the landscape area on the Register*’ (paragraph 7.7).

- 1.6 *Planning Policy Wales* (Edition 12, 2024) explains that ‘*Planning authorities should protect those assets included on the register of historic landscapes in Wales. As above, the sharing and use of evidence and assessments undertaken for wider reasons, such as Green Infrastructure Assessments, should be used to identify and better understand historic landscapes and ensure their qualities are protected and enhanced. The register should be taken into account in decision making when considering the implications of developments which meet the criteria for Environmental Impact Assessment or, if on call in, in the opinion of the Welsh Ministers, the development is of a sufficient scale to have a more than a local impact on the historic landscape. An assessment of development on a historic landscape may be required if it is proposed within a registered historic landscape or its setting and there is potential for conflict with development plan policy*’ (Welsh Government 2024, paragraph 6.1.21).
- 1.7 A summary of national and local planning policy in relation to historic landscapes is presented within Appendix 8.1 of the Environmental Statement (ES) that has been produced with regard to the Development of National Significance (DNS) application for the Proposed Development.
- 1.8 The purpose of an ASIDOHL is to assess the overall significance of effect of the Proposed Development on the individual HLCAs within the registered LOHI and also to assess what effects the Proposed Development may have on the whole of the registered LOHI.
- 1.9 The appraised level of confidence of the data on which this ASIDOHL is based is high – there have not been any problems regarding access to land or to data, or any issues regarding confidentiality or copyright. The principal concern regarding the data is that for the HLCA within which the Proposed Development is partially located, the baseline descriptions have not been updated to take account of changes that have occurred subsequent to the work that was carried out to develop the description of the HLCA.
- 1.10 This ASIDOHL has been produced by Mick Rawlings, BA (Hons) Archaeology and Geography, MCIfA, FSA, Director of Heritage at Tetra Tech Consulting Ltd, on behalf of the applicant.
- 1.11 The assessment covers all five stages of ASIDOHL2 and has been undertaken following a series of visits to the HLCA affected by the proposed development.
- 1.12 Further information regarding the details of the Proposed Development is presented within other documents that form part of the application for consent for the development. In summary, the Proposed Development comprises:
- The construction and operation of a solar photovoltaic electricity generating station (or ‘solar farm’) with an installed generation capacity of approximately 99.9MW;
 - The construction and operation of a 132 kV electrical substation;
 - Associated ancillary development; and
 - A c. 10.5 km long cable connection to a substation west of the Severn power station at Uskmouth. The cable would be contained within the existing highways boundary.

- 1.13 Figures 1 and 2 show the location of the Proposed Development in relation to the Gwent Levels LOHI and HLCA009 Green Moor. The Proposed Development is wholly to the north of the South Wales Main Line railway and the Llanwern Steelworks industrial complex. The LOHI is located wholly to the south of the railway and the steelworks. HLCA009 Green Moor includes land within the northern part of the LOHI and within the south-eastern part of the Proposed Development, as well as an intervening area of land to the north and south of the South Wales Main Line railway. Much of that part of HLCA009 Green Moor south of the South Wales Main Line railway and outside the LOHI is occupied by a number of large modern distribution warehouses and associated infrastructure (the Gwent Europark).
- 1.14 In the published Register of Landscapes of Outstanding Historic Interest in Wales (CCW, Cadw and ICOMOS UK, 1998), the Gwent Levels are described thus:

The Gwent Levels are an extensive low lying area of estuarine alluvium located on the north side of the Severn estuary in South East Wales, between Cardiff and the River Rhymney in the west and Chepstow on the River Wye in the east. Topographically, the levels are taken as extending south of the 10m contour line, approximately the fen edge or interface with solid geology to the north (roughly coinciding with the modern east-west line of the London to Cardiff railway), though because they tilt northwards from the sea are generally at their lowest near their boundary with the solid geology inland. On the south side, the levels fringe the coastline and are protected by sea walls and banks. Geographically, they are divided into two main areas, namely Wentlooge to the west of the River Usk, and Caldicot to the east.

The levels are a landscape of extraordinarily diverse environmental and archaeological potential. Although they are an important wetland resource in their own right, archaeologically the area contains a variety of landscapes of different dates, and nowhere else in Wales is it possible to make these period distinctions so easily. Man's past activities in the area have been governed by the vast tidal range within the Severn estuary, which has seen major and minor fluctuations in the heights and range of the tides since the last glaciation, caused by variations in both land and sea level. The levels reflect man's evolving and often precarious relationship with these circumstances over the last ten thousand years.

Having been reclaimed from the sea at various times during the historic period, the present land surface is a supreme example of a 'hand-crafted' landscape. Artificially created and entirely the work of man, preserving clear evidence of distinctive patterns of settlement, enclosure and drainage systems from successive periods of use. However, because of recurrent phases of inundation and alluviation, there is also a proven, and possibly quite vast, potential for extensive, buried, waterlogged, archaeological and environmental deposits belonging to earlier landscapes, including within the area of the intertidal mudflats beyond the sea walls and banks. The levels are therefore a uniquely rich archaeological and historical resource in Wales, and certainly of international importance and significance.

Man's greatest impact on the wetland landscape has been his determination and success in reclaiming the levels, which has been on-going at least since the Roman period. Although the area is crossed by natural drainage, principally the River Usk with its broad tidal estuary, the Rivers Rhymney and Ebbw, and the Goldcliff Pill, the greater part of the levels has been the subject of artificial drainage schemes, so that today the area is criss-crossed by drainage channels, known locally as reens. However, elements of older drainage networks are still incorporated into some of the artificial drainage networks inland of the sea walls, whilst other elements have been abandoned, either at the time of reclamation or more recently. The abandoned drainage systems are represented by palaeochannels, some of which are clearly seen on aerial photographs.

The present derived landscape thus comprises the following features: major reens resulting from natural watercourses; major reens which are wholly artificial; inland abandoned sea banks whose origins are obscure; sea walls probably originating in the 16th century; gouts where reens meet and coffer gouts where they cross; pills where the major reens discharge either into tidal channels or into the estuary itself; the bridges across the reens and the roadways built upon embankments; and not least the distinctive and characteristic field patterns belonging to different phases of enclosure.

In relation to the buried, archaeological landscape, Mesolithic remains have been discovered at Goldcliff, stratified in an estuarine clay underlying a sequence of peat deposits. Additionally, late Mesolithic footprints, impressed into the lower Wentlooge Formation have been found at Uskmouth. Again they were preserved in estuarine clay beneath a deposit of clay. It is reasonable to suppose that other important evidence of Mesolithic activity will be found preserved further inland, and most particularly at the interface between the levels and the solid geology to the north.

Bronze Age activity has been recorded at various sites on desiccated raised peat beds, such as at Chapel Tump. More recently, outside the area described here, at Caldicot Castle, there is detailed evidence of palaeochannels, pile structures, a boat strake and a considerable amount of cultural material. Iron Age evidence has been discovered in the intertidal zone at Gold Cliff with rectangular timber buildings, trackways and fishtraps on a shelf of fen peat. Also outside, but near the area, at Barland's Farm, Wilcrick, Roman stone and timber structures and the remains of a late 3rd century Romano-British boat have been found, alongside a buried creek, emphasising the remarkable state of preservation of archaeological material in the levels.

The oldest surface landscape of the levels is probably that of central Wentlooge, which recent work at Rhymney Great Wharf has proved to be of Roman date. The presence of Romano-British finds within some of the fossil reens exposed in foreshore erosion faces indicates that the present rectilinear drainage pattern of fields is almost certainly of Roman date and therefore unique in Britain, if not in North West Europe. The Middle Ages are represented by a large number of Anglo-Norman sites including castles, moated sites, churches, mills, manor houses and court houses. There is evidence of continuity in the forms of land use between the medieval and post-medieval periods. The area saw increasing enclosure of the fields although, as late as 1830, considerable areas remained as unenclosed common. Whilst much of the basic network of reens had been established before this period, it continued to be developed and modified, particularly as land became enclosed.

- 1.15 Extensive programmes of archaeological work within the Gwent Levels commenced ahead of the designation of this area as a LOHI and these programmes contributed greatly towards an understanding of the pre-drainage utilisation of the landscape and its subsequent development to reach its present form. The available information was incorporated within a major study of the historic landscape that formed the basis for the designation (Rippon, 1996).
- 1.16 The archaeological work has continued after the designation of the historic landscape and has provided further valuable information. Much of this has been published, including work on the archaeology of the intertidal zone areas (summarised in Bell et al 2000, and Bell 2013). This programme of investigation and also others mostly associated with commercial development have greatly increased our understanding of the history of the Gwent Levels (*cf.* Parkhouse and Parry 1990; Yates 2000; Meddens 2001; Meddens and Beasley 2001; Yates et al 2001; Nayling and McGrail 2004; Bell 2007). This has also been achieved through further studies of the landscape history based on examination of landscape character along with historical documentary and cartographic material (*cf.* Rippon, 2014).
- 1.17 As mentioned above, some of the archaeological work carried out in the Gwent Levels over recent years has been associated with commercial developments, some of which have themselves had an effect on the character of the historic landscape subsequent to its designation as a LOHI. Such developments include business parks and industrial estates such as those to the south of Cardiff but also Imperial Park to the south-west of Newport and the Gwent Europark, west of Magor. Other developments include new bird-feeding grounds, golf courses, solar farms and also taller elements such as pylons and wind turbines. All of these have contributed towards a cumulative gradual reduction in the value of the historic landscape character.

2. STAGE 2: ASSESSMENT OF DIRECT, PHYSICAL IMPACTS OF DEVELOPMENT

- 2.1 The Proposed Development lies partially within HLCA009 Green Moor. Figure 2 shows the Proposed Development in relation to that HLCA.
- 2.2 The following extracts are taken from the detailed information regarding the Green Moor HLCA provided in the Gwent Levels Historic Landscape Characterisation study (Glamorgan-Gwent Archaeological Trust (GGAT) and Cadw) available on-line through the Heneb GGAT website: (https://heneb.org.uk/archive/ggat/cadw/historic_landscape/main/english/historical.htm).

Historic background

The framework of major reens and lands date to at least the mid-sixteenth century, and probably earlier. However, the pattern of fields is largely post-medieval. The areas north and east of the railway were enclosed first, possibly in the seventeenth or eighteenth centuries; Green Moor proper, south of Llanwern, was enclosed c. 1850.

When the Gwent Europark was under construction a nearly complete Roman boat was discovered beside a stone and timber quay.

In the medieval/post-medieval period Green Moor was an extensive common pasture used by many of the surrounding communities.

Key historic landscape components

The lowest-lying area of back-fen. The southern area bounds the Steel Works, railway and Gwent Europark to the north, Rush Wall (area 8) and Blackwall to the south/east (area 10). The block to the north of the railway retains its original fen-edge.

The principal elements of this very uniform landscape are a very regular pattern of field-boundaries, laid out within a grid of straight roads and major reens. There are few other landscape features and just one settlement (Barland's Farm). Certain areas have good grips and some fine bridges (e.g. along Rush Wall). A duck decoy pond is documented at ST 416 862.

The condition of this landscape is mixed. To the east and north of the Gwent Europark, most boundaries survive, fields retain surface ridging, and fragmentary hedges contain a large number of mature willows; this landscape has a strong wetland feel, typical of low-lying back-fen areas. The area south of the Steel Works has been used as an ash tip.

The area south of Magor village is now a nature reserve, run by the Gwent Wildlife Trust. Traditional management methods preserve areas of rich meadow and 'fen carr' vegetation.

Though once a common type of field pattern, the distinctively homogeneous back-fen landscapes are now rare. Areas north and east of the Gwent Europark are typical, in good condition and retain the original fen edge. There are fine views of the adjacent uplands, although the area south west of Llandeenny village is overshadowed by the Gwent Europark. Overall, the eastern and northern areas have a very high integrity and coherence.

- 2.3 Approximately 26 hectares in the south-eastern part of the eastern block of the Proposal Site is within HLCA009 Green Moor (Figure 2), representing approximately 26% of that part of the HLCA north of the South Wales Main Line railway. Land measuring approximately 5.8 hectares within the south-eastern part of this block and within HLCA009 Green Moor has been identified for habitat enhancement (nesting birds).
- 2.4 Most of the remaining 20.2 hectares of land within HLCA009 and within the Proposal Site would be used for the establishment of solar panels and associated infrastructure, although there would be a 'buffer zone' of wildflower meadow to the east of the settlement at Bishton and around public rights of way, also an area of wildflower meadow and orchard at the south-western edge of the Proposal Site (Figure 3). No field boundaries would be removed, and no ditches would be infilled, thus the impact on the character of the historic landscape would be time-limited and fully reversible rather than permanent.

Stage 2a: Direct physical impacts - absolute

- 2.5 The development elements would occupy c. 15.3 hectares of land wholly within this HLCA. The HLCA measures 478 hectares, therefore that part directly impacted represents 3.2% of the overall HLCA.

Stage 2b: Direct physical impacts - relative

- 2.6 The Proposed Development is entirely within that part of the HLCA which is north of the South Wales Main Line railway and thus physically separated from the rest of the HLCA. This part of the HLCA north of the railway occupies c. 101 hectares of land, therefore the 15.3 hectares required for the development elements would impact 15.1% of this part of the HLCA.

Stage 2c: Direct physical impacts – landscape

- 2.7 This area north of the railway makes a very strong contribution towards the overall significance of the HLCA in that it is the lowest-lying area of back-fen and it retains the original fen-edge with a clear connection to the adjacent upland areas.
- 2.8 The key elements of the historic landscape are the field boundaries which establish a regular pattern that documents the process of drainage and enclosure. Many of the boundaries are water-filled reens crossed by small field-bridges, with a minor road that passes to the south of the proposed development site also being made up of straight elements as a result of the enclosure process.
- 2.9 All of the fields within the proposed development site and also within the HCLA are in arable use, with no grips present and surface ridging almost completely lost.

Table 1: Assessment of direct physical impacts on HLCA009 Green Moor

Historic Landscape Area: Gwent Levels		Historic Landscape Character Area: Green Moor		
ASIDOHL2 Stage 2: Assessment of Direct, Physical Impacts on Historic Character Area				
Development: Craig y Perthi solar farm				
Absolute Impact (Area affected): 15.3 ha. of 478 ha., 3.2%		Magnitude & Score: Very Slight - 1		
Relative and Landscape Impacts (Loss of Known Characteristics or Elements) & Scores				
Element / % Loss	Category	Magnitude	Landscape Value	Landscape Value Effect
Partial loss of ability to experience and understand the character of the historic landscape as a result of the change of land-use and the reduced visibility of the regular field pattern within the proposal site	A - 4	Very slight - 1	Very high – key element of the historic landscape - 6	Very slightly reduced - 1
Physical impact on historic reens	A - 4	None - 0	Very high – key element of the historic landscape - 6	None - 0
Physical impact on grips or surface ridging	C - 2	None - 0	Medium – poorly preserved element of the historic landscape - 3	None - 0
Notes				
All direct physical impacts would be time-limited and fully reversible.				
Compiled by: Mick Rawlings		Date: 19/06/26		

Table 2: Overall magnitude of direct physical impacts on HLCA009 Green Moor

Score	Grading
$(4 + 1 + 6 + 1) + (4 + 0 + 6 + 0) + (2 + 0 + 3 + 0) = 27$	10 = Moderate
$27 \div 3 = 9$	
$9 + 1 = 10$	

3. STAGE 3: ASSESSMENT OF INDIRECT IMPACTS OF DEVELOPMENT

- 3.1 It is considered that the Proposed Development has the potential to indirectly affect just one HLCA within the registered Landscape of Outstanding Historic Interest: HLCA009 Green Moor. The remaining HCLAs would not be affected due to lack of visibility (topography) and to distance from the Proposed Development.
- 3.2 No indirect, physical impacts on any HLCA (ASIDOHL2 Stage 3a) have been identified with regard to the Proposed Development. No physical change or alteration in land use will occur within any HLCA other than HLCA009 Green Moor as described above in Stage 2; nor will the development lead to an increase in the management requirements of any HCLA.
- 3.3 Indirect (non-physical) visual impacts (ASIDOHL2 Stage 3b) have been examined through a series of site visits, also using the Zone of Theoretical Visibility (ZTV) produced for the Landscape and Visual Impact Assessment (LVIA) regarding the Proposed Development.
- 3.4 The photomontages of the Proposed Development which are reproduced in the LVIA have been consulted in order to understand how the Proposed Development would appear in views from selected locations.
- 3.5 The description of HLCA009 Green Moor has been provided above in Stage 2.
- 3.6 The Proposed Development would only really be visible from those parts of the HLCA north of the South Wales Main Line railway, most of which is not within the proposal site. From here elements of the Proposed Development would be visible on the rising ground to the north-west of the HLCA, and from some locations this visibility would encompass quite extensive areas within the immediate setting of the HLCA.
- 3.7 There may be partial glimpsed views of the Proposed Development from other locations within the HLCA south of the railway, such as land to the east of the Gwent Europark or to the south of the Llanwern steelworks, but these would be views of the more elevated parts of the Proposed Development and would be seen in the context of other, more substantial developments, such as the steelworks, the large buildings and wind turbines within the Gwent Europark, the AnBev Brewery and the operational railway with its recent overhead electrification equipment.

Table 3: Assessment of indirect (non-physical) impacts on HLCA009 Green Moor

Historic Landscape Area: Gwent Levels		Historic Landscape Character Area: 009 Green Moor
ASIDOHL2 Stage 3b: Assessment of Indirect, Visual Impacts on Historic Character Area		
Development: Craig y Perthi solar farm		
Impacts	Category & Score	Magnitude & Score
Moderate change within setting of drained and enclosed back-fen and fen-edge landscape	A – 4	Moderate - 3
Development form	4	Moderate – 3
Development appearance	4	Moderate - 3
Average Score		7
Notes: All indirect (non-physical) impacts would be time-limited and fully reversible.		
Compiled by: Mick Rawlings		Date: 19/06/26

3.8 Table 4 below shows the overall magnitude of the indirect impacts on HLCA009 Green Moor. As per the ASIDOHL2 methodology (page 22 of the Guide to Good Practice), the average score for the indirect (non-physical) visual impacts (as recorded in Table 3) has been multiplied by 28 and then divided by 20, with the resulting figure (9.8) rounded off to the nearest whole number.

Table 4: Overall magnitude of indirect impacts on HLCAs

HCLA Name	Score	Magnitude
Green Moor	10	Moderate

4. STAGE 4: EVALUATION OF RELATIVE IMPORTANCE

- 4.1 As evidenced by its place within the national Register, the historic landscape of the Gwent Levels is of special interest. The evaluation of relative importance of the HLCA within a national context recognises that although the designated landscape is of national importance, some areas or individual elements could be of higher value than others.
- 4.2 Stage 4 of ASIDOHL(2) is the process through which the relative importance of that part of each HLCA affected by a proposed development is evaluated in relation to:
- The whole of that HLCA; and
 - The whole of the designated historic landscape.
- Followed by:
- An evaluation of the relative importance of the HLCA within the national context, by which is meant the designated historic landscapes on the Register, not the whole of the country.
- 4.3 The evaluation of the relative importance of HLCA009 Green Moor is presented in Table 5 below.
- 4.4 The part of this HLCA that is most affected by the Proposed Development comprises the back-fen and fen-edge areas of the drained and enclosed former wetlands. These elements are rare within the HLCA and increasingly rare at the registered landscape and national level. This part of the historic landscape is well-documented, and the elements have good group value at the HLCA level, decreasing at registered landscape and national level.
- 4.5 Survival of this part of the historic landscape is reasonably good, as is its condition, whilst the coherence and integrity of the main elements is very good and there is good potential for future study at a landscape level. There is limited potential for amenity use and very little association with historical events.

Table 5: Evaluation of relative importance of that part of HLCA009 Green Moor which would be affected by the Proposed Development

Value	V HIGH/ V GOOD	HIGH/ GOOD	MOD/ MED	LOW	POOR/ NONE
In relation to (a) Whole of historic landscape character area					
Rarity		√			
Representativeness			√		
Documentation	√				
Group Value			√		
Survival	√				
Condition			√		
Coherence	√				
Integrity	√				
Potential	√				

Amenity	√	
Associations		√
In relation to (b) Whole of historic landscape area on the Register		
Rarity	√	
Representativeness		√
Documentation	√	
Group Value		√
Survival	√	
Condition		√
Coherence	√	
Integrity	√	
Potential	√	
Amenity		√
Associations		√
In relation to (c) Relative importance of HLCA in the national context		
Rarity	√	
Representativeness		√
Documentation	√	
Group Value	√	
Survival		√
Condition		√
Coherence	√	
Integrity	√	
Potential	√	
Amenity		√
Associations		√

Table 6: Relative importance of the part of HLCA009 Green Moor affected by development

Average score (a) out of 55	Average score (b) out of 55	Average score (c) out of 55
41	39	44
÷ 55, x 100	÷ 55, x 100	÷ 55, x 100
74.54	70.90	80.00
Overall value = (74.54 + 70.90 + 80.00) ÷ 3 = 75.15 = High		

5. STAGE 5: ASSESSMENT OF OVERALL SIGNIFICANCE OF IMPACT

- 5.1 This is the final stage of the assessment and combines the results of Stages 2 to 4. It assesses the overall significance of the impact of the Proposed Development and the effect that altering the HLCAs concerned will have on the whole of the historic landscape area on the Register.
- 5.2 This is achieved through scoring the value of each of the HLCAs affected by the Proposed Development in relation to the effect of the development and the consequent reduction in value of the historic landscape on the Register.
- 5.3 The Proposed Development will have a direct impact on one HLCA and an indirect visual impact on the same HLCA within the registered Gwent Levels Landscape of Outstanding Historic Interest. The overall significance of impact is summarised in Table 7 below.

Table 7: Overall impact on HLCA009 Green Moor

Value of HLCA	Impact of Development	Reduction of value of the historic landscape on the Register
Key elements comprise the field pattern with straight boundaries indicating formal enclosure of drained former wetlands. Survival is good and the back-fen location with the fen-edge adjoining the rising ground is rare within the registered landscape, although land is used for arable farming therefore no grips or surface ridging survives.	Slight land loss although not permanent and fully reversible. The Proposed Development would make it slightly more difficult to appreciate and understand the character of the historic landscape. This would occur over the full duration of the time-limited development.	Development impact on key elements is such that there is slight reduction in the overall value of the registered landscape. This would occur over the full duration of the time-limited development.
Score: 9	Score: 3	Score: 3
Total Score for HLCA: 9 + 3 + 3 = 15		
Overall significance of impact for HLCA: Moderate		

- 5.4 Table 8 below shows the overall impact of the Proposed Development on the Gwent Levels Landscape of Outstanding Historic Interest. Just one of the 21 HLCAs in the Gwent Levels Landscape of Outstanding Historic Interest would be subject to impacts, including direct physical impacts as well as indirect (non-physical) visual impacts.

Table 8: Overall significance of impact of the Proposed Development on the Gwent Levels Landscape of Outstanding Historic Interest

HCLA Name	Total Score	Overall significance of impact
Green Moor	15	Moderate
Average of combined HLCAs	$18 \div 21 = 0.71$	
Historic Landscape on the Register	1	Very Slight

Mitigation

- 5.5 Mitigation of the impact of the Proposed Development on the registered historic landscape is in the form of the detailed design. This has been with regard to the location and design of the Proposed Development elements in order to ensure that harm to the existing historic landscape character is reduced as far as is reasonably possible. Further mitigation is proposed in the form of information boards that will be placed within publicly accessible areas that are identified within the application documents. These will include information regarding the historical development of the Gwent Levels landscape.

6. ASIDOHL2 CONCLUDING STATEMENT

- 6.1 The Proposed Development would see the establishment of a solar park extending over the very northern edge of the Gwent Levels (i.e. the former back-fen area) and onto the lower slopes of the rising ground beyond the drained wetlands. No part of the Proposed Development lies within the registered Gwent Levels Landscape of Outstanding Historic Interest (LOHI). However, some of the land required for the Proposed Development is located within a defined Historic Landscape Character Area (HLCA) which contributes towards the overall significance of the registered LOHI.
- 6.2 The defined HLCA (009 Green Moor) includes land within the northern part of the LOHI and within the south-eastern part of the Proposed Development, as well as an intervening area of land to the north and south of the South Wales Main Line railway. Much of that part of HLCA009 Green Moor south of the South Wales Main Line railway and outside the LOHI is occupied by a number of large modern distribution warehouses and associated infrastructure (the Gwent Europark). The key elements of the HLCA have been defined as the very regular pattern of field boundaries within a grid of straight roads and major drainage ditches.
- 6.3 Subsequent to the placing of the Gwent Levels LOHI on the register, a number of major changes have taken place as the area responds to the needs of modern society. These changes include the establishment of a large solar farm wholly within the LOHI (and applications submitted for two more), as well as the extension of industrial and commercial facilities such as the Gwent Europark and the construction and operation of large wind turbines.
- 6.4 The ASIDOHL2 process has identified that the only direct physical impact resulting from the Proposed Development would be on the Green Moor HLCA. This impact would take place within the northern part of the HLCA, which is the lowest-lying area of back-fen and which retains the original fen-edge with a clear connection to the adjacent upland areas. The level of direct physical impact on the HLCA has been identified as 'Moderate'.
- 6.5 No indirect physical impacts have been identified with regard to any part of the registered LOHI or the twenty-one defined HLCAs which contribute towards the overall significance of the registered LOHI.
- 6.6 Using the ZTV established for the Proposed Development, a series of site visits and also the photomontages produced as part of the Landscape and Visual Impact Assessment (LVIA) regarding the Proposed Development, the ASIDOHL2 process has identified that indirect (non-physical) visual impacts would occur on just one of the twenty-one HLCAs within the registered historic landscape – HLCA009 Green Moor. The level of indirect visual impacts on this HLCA has been identified as 'Moderate'.
- 6.7 The overall significance of the impact of the Proposed Development has been assessed as 'Moderate' for HLCA009 Green Moor, although this impact is time-limited and fully reversible. It should also be noted that the affected part of HLCA009 Green Moor is wholly outside the registered historic landscape, and is separated from that part of the HLCA that is within the registered historic landscape by the South Wales Mainline Railway, the industrial and commercial facilities and the wind turbines at

the Gwent Europark, and the A4810 distributor road. Although the eastern part of the Gwent Europark has not yet been built out, the land here is allocated for development and outline planning consent has been granted. That part of HLCA009 Green Moor that is within the registered historic landscape would not be impacted, either directly or indirectly.

- 6.8 The combined overall significance of impact on the Gwent Levels Landscape of Outstanding Historic Interest is considered to be 'Very Slight'. As such, the Proposed Development would result in a negligible reduction in the capacity for understanding or appreciating the significance of the historic landscape.
- 6.9 This needs to be considered alongside the potential for cumulative impacts on the registered historic landscape arising from the construction and operation of similar developments. There is already one large operational solar farm situated wholly within the Gwent Levels Landscape of Outstanding Historic Interest – this is the Llanwern Solar Farm which comprises three separate areas of solar panels around the village of Whiston (Figure 4).
- 6.10 To the west of the river Usk, a proposed solar farm known as the Wentlooge Farmers' Solar Scheme and located to the east of Marshfield was refused consent by Welsh Government on the basis of unacceptable impact on the registered historic landscape, but was revised and resubmitted and is currently under examination by Planning and Environmental Decisions Wales (PEDW).
- 6.11 To the south-east of the Gwent Europark is the site of the proposed Rush Wall Solar Farm for which an application is currently being examined by PEDW, whilst immediately to the east is the site of the solar farm element of the proposed Magor Net Zero scheme.
- 6.12 Taken together, these solar farms have the potential for cumulative impacts on the Gwent Levels Landscape of Outstanding Historic Interest. The assessed impact of the Proposed Development on the registered historic landscape is considered to be 'Very Slight'. This low level of impact is largely due to the Proposed Development impacting on just one of the HCLAs that make up the registered historic landscape, with the direct and indirect impacts actually occurring in respect of that part of the HCLA which is outside the registered historic landscape.
- 6.13 The existing Llanwern Solar Farm, along with the proposed Rush Wall Solar Farm and the proposed solar farm element of the Magor Net Zero scheme (and any revised version of the Wentlooge Farmers' Solar Scheme) are all wholly within the registered historic landscape. Consequently, the contribution of the Proposed Development to any cumulative impact on the Gwent Levels Landscape of Outstanding Historic Interest is likely to be extremely low as it does not result in any direct impacts on land within the registered historic landscape.

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Figures