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)







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Cover photograph: View east towards Angle bay in the Milford Haven historic landscape, with Angle village and its medieval strip fields (centre right) and Chapel Bay Fort (centre left) overlooking the coast (© RCAHMW).

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This Guide to Good Practice relates to the **■** non-statutory *Register* of *Landscapes* of Historic Interest in Wales. The Register's principal sponsors, Cadw and the Countryside Council for Wales, have prepared it with the assistance of the four Welsh Archaeological Trusts. The Guide is non-statutory and advisory only. It is intended to assist local planning authorities to decide how much weight to give to information in the Register when determining planning applications. It is also intended to assist others involved in the planning and development process in Wales, particularly developers preparing Environmental Impact Assessment statements, to bring forward plans and proposals that are likely to have the least possible adverse impact on historic landscape areas on the Register.

The Guide comes in two sections. The first, 'Planning for Historic Landscapes', describes the background to the Register, the follow-up programme of Historic Landscape Characterization in the areas identified on it, the general principles underpinning the identification and conservation of historic landscapes, and the suggested use of the Register within the planning process and other assessment decision procedures not promoted through the Town and Country Planning Acts. The second section of the guide consists of a Technical Annex that sets out a staged process for assessing the significance of the impact of development on historic landscape areas on the Register (ASIDOHL2). It is recommended that assessments be routinely undertaken in the circumstances described above and in accordance with the suggested use of the Register described in the Guide.

Note on the Revised (2nd) Edition

The experience gained since the publication of the first edition of the Guide in 2003 has necessitated the publication of a revised, second edition, containing amendments and improvements. Users of the Guide have also contributed a number of helpful suggestions that have been incorporated. The principal changes are to be found in the formulae and grading systems used in Stages 2–4 of the ASIDOHL process described in the Technical Annex in the second section of the Guide. To differentiate this from that in the first edition, this will now be known as ASIDOHL2. The changes have been introduced to ensure that development impacts are treated more fairly and consistently, because there were anomalies present in some of

the formulae and score ranges used in the first version of the process. The structure of the ASIDOHL process and the body of the text, however, remain essentially unchanged. The planning and development process, to which the advice in the Guide applies, also remains largely unchanged. The first section of the Guide, on Planning and Historic Landscapes, therefore, contains only minor changes and amendments to bring that section up to date.

The sponsors are pleased that in the four years since the first appearance of the Guide in 2003, the ASIDOHL process has become increasing recognized and accepted as a useful tool in Environmental Impact Assessments (EIA). However, experience shows that misunderstandings can still arise later on in the planning process after Environmental Statements have been completed, for example when planning applications or appeals have

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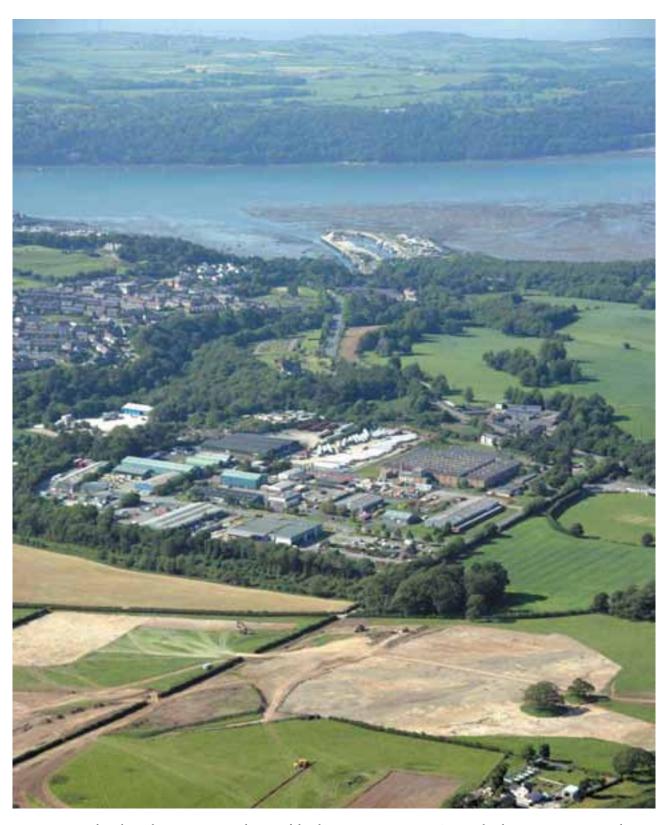
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become subject to Public Inquiries. These could have been avoided had more use been made of the advice available from the sponsors on the scope of the ASIDOHL assessments. The sponsors feel that their advice is best sought at the beginning of the planning process before an ASIDOHL assessment is commissioned (for example at the scoping stage in an EIA). This would ensure that agreement is reached on the nature and range of the impacts that should be considered in the assessment; which and how many Historic Character Areas should be taken into account, and whether there are any special elements or characteristics within them of which particular note should be taken.

The test by which the sponsors judge an ASIDOHL2 assessment when giving their advice to planning authorities is that it should contain sufficient information for the 'responsible authority', in the case of EIA, or an

Inspector in the case of a Public Inquiry, to come to a balanced view in determining the planning application or appeal concerned. This relates not only to the appropriate range of impacts and Historic Character Areas being identified at the start of the ASIDOHL process, but also to the provision of sufficient written justification for scores given in the various stages of the process as an assessment is compiled. The onus, therefore, is on developers to ensure that the sponsors consider the ASIDOHL assessment satisfies this test. The sponsors accept that further advice may be needed concerning particular stages or points in the ASIDOHL process as assessments are compiled, and reference is made to this in the Technical Annex. This or any other advice concerning the Guide can be sought at any time from the contacts listed in the Appendix.

LANDSCAPE AREAS

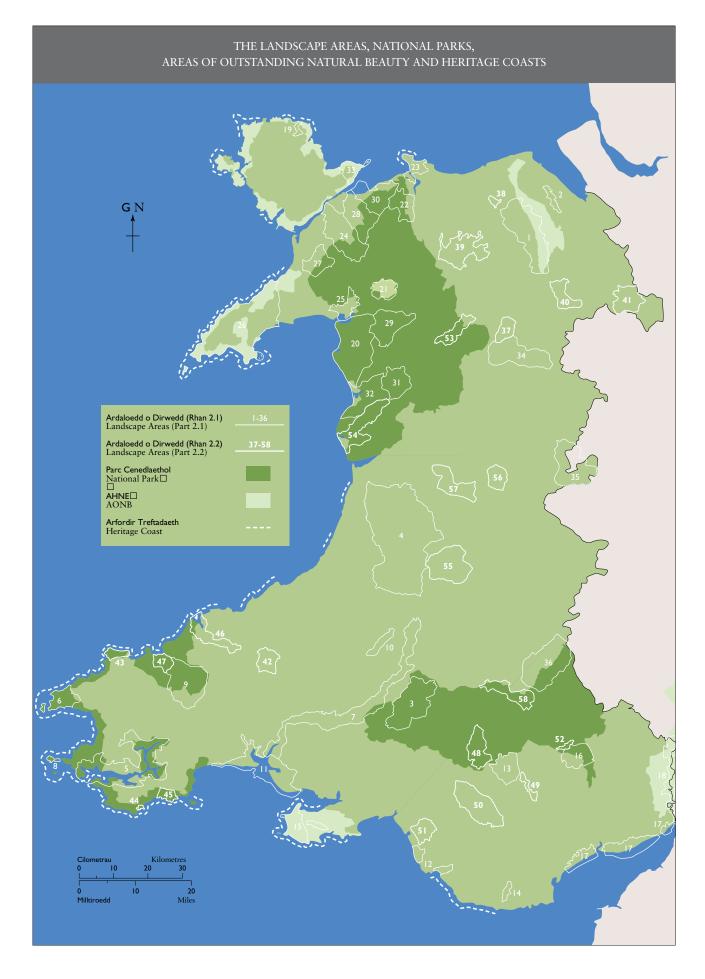


View across archaeological excavations in advance of developments at Parc Bryn Cegin, Llandygai, near Bangor, in the Ogwen Valley historic landscape. Behind can be seen the Llandygai Industrial Estate, where archaeological excavations in advance of its construction, in 1966–67, revealed important evidence of occupation and ceremonial activities dating back to the Neolithic period (© RCAHMW).

- 1. Vale of Clwyd HLW (C) 1
- 2. Holywell Common and Halkyn Mountain HLW (C) 2
- 3. Black Mountain and Mynydd Myddfai HLW (D) 1
- 4. Upland Ceredigion HLW (D) 2
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- 13. Merthyr Tydfil HLW (MGl) 2
- 14. Llancarfan, Vale of Glamorgan HLW (SGl) 1
- 15. Gower HLW (WGl) 1
- 16. Blaenavon HLW (Gt) 1
- 17. Gwent Levels HLW (Gt) 2
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PLANNING FOR HISTORIC LANDSCAPES



An aerial view of the lagoons and reedbeds of the Gwent Levels Wetland Reserve created to replace habitats lost when the Cardiff Bay Barrage was constructed. The reserve has been successfully integrated into the pattern of the Gwent Levels historic landscape (\bigcirc RCAHMW).

1.0 Background to the Register of Landscapes of Historic Interest in Wales

- 1.1 The whole of the Welsh landscape can be said to be historic, with human activity often having been at the heart of its creation. The nature of its terrain, the stewardship exercised over the centuries by generations of landowners and farmers, along with only limited intensive cultivation and urbanization, have produced ideal conditions that have favoured the survival of much of the historic character of the Welsh landscape. However, since the beginning of the twentieth century, the scale and pace of change has intensified, and as we enter the twenty-first century, the historic character of the landscape is increasingly under pressure from a variety of new changes as older features are renewed or replaced, or when new features, often with very different characteristics, have to be introduced to meet modern needs.
- 1.2 Against this background and to be better informed about how to accommodate necessary change in a way that is sensitive to the historic character of landscape, Cadw, the Countryside Council for Wales (CCW) and the International Council on Monuments and Sites (ICOMOS UK) decided to collaborate to produce the Register of Landscapes of Historic Interest in Wales as a means of identifying, and to provide information on, the most important and best-surviving historic landscapes in Wales. The Royal Commission on the Ancient and Historical Monuments of Wales, the four Welsh Archaeological Trusts and the Welsh local authorities also collaborated in the project.
- 1.3 The Register has been issued in two parts, covering thirty-six 'outstanding' and twenty-two 'special' historic landscape areas, and forms Part 2 of the wider exercise to compile an overall Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales. For the purpose of this Guide, therefore, the term 'historic landscape' refers to an area identified on the *Register of Landscapes of Outstanding Historic Interest in Wales* (published as Part 2.1, by Cadw, in 1998, ISBN 1 85760 007 X), or on the *Register of Landscapes of Special Historic Interest in Wales* (published as Part 2.2, by Cadw, in 2001, ISBN 1 85760 187 4). The Guide does not deal with Part 1 of the Register, which is concerned with historic parks and gardens.
- 1.4 It is hoped that the greater account that has been taken of historic landscapes generally since the Register, and then the Guide, were first published, can be sustained in landscape planning, management, conservation, enhancement and interpretation, and in providing opportunities for access and recreation. In raising awareness of the historic significance and importance of the Welsh environment overall, use of the Register and this Guide should also encourage everyone

- concerned to give greater weight to historic landscape issues alongside the more traditional and long-established conservation issues.
- 1.5 At the same time, the Register recognizes that landscapes are dynamic, living systems fashioned to meet current, mainly economic, needs and that what exists today is largely a created landscape, produced through human endeavour since the beginning of farming in this country. Landscapes, therefore, will continue to change, and need to change, so the intention is not to fossilize them, or to prevent them from being altered, but rather to manage them in ways that will allow the key historic elements or characteristics from the past to be retained while still meeting modern needs.
- 1.6 All landscape areas identified on the Register are of national importance in the Welsh context. The difference between the landscapes of outstanding historic interest featured in Part 2.1, and the landscapes of special historic interest featured in Part 2.2, therefore, is one of degree, and not quality of historic interest. The distinction was established by expert consensus following the scoring thresholds set for the selection of areas to be included on the Register. The scoring thresholds were verified by field assessments and are described in detail in the introduction to the Register. In summary, the distinction is intended to reflect the fact that the landscapes of special historic interest are generally smaller in size and have fewer selection criteria against which they could be justified, compared to the landscapes of outstanding historic interest. The distinction, however, should not cause the former to be considered of less value than the latter, and so far as the advice on the use of the Register is concerned, both categories should be treated in the same way.
- 1.7 Further information on the background to the creation of the Register, its methodology and its role, can be found in the introduction to Part 2.1, with a supplement of additional, updated information included in the introduction to Part 2.2.
- 1.8 Cadw has also published a more general guide to historic landscapes intended to raise awareness of their existence and importance amongst a wider audience (*Caring for Historic Landscapes*, Cardiff, 2003).

2.0 Suggested use of the Register within the planning and development process

2.1 This Guide and the following Technical Annex are primarily aimed at the assessment of individual projects and the development control process. They do not specifically apply to the assessment of development plans and the Strategic Environmental Assessment of plans and programmes, for example, Unitary or Local Development Plans,

Transport Plans, the Trunk Road Programme, and so on; nevertheless, such plans and programmes should acknowledge and make reference to the principles involved and the need to consider historic landscape issues. The Guide and Technical Annex do not, at this stage, address the issue of longer-term, cumulative impact of development or change in historic landscapes. This would require a process of strategic, long-term assessment and monitoring, enabling pressures, stresses and risks to be identified and, ultimately, the establishment of indicators and 'limits of acceptability' and 'most favoured status' of the landscape areas on the Register. The sponsoring bodies hope that this Guide and Technical Annex will be used as a tool to start and underpin that process.

- 2.2 Advice on listed buildings and conservation areas in the planning process is given in Welsh Office Circulars 61/96 *Planning and the Historic Environment: Historic Buildings and Conservation Areas* and 1/98 *Planning and The Historic Environment: Directions by the Secretary of State for Wales*; and in Welsh Assembly Government *Planning Policy Wales*, March 2002, paragraphs 6.5.7 to 6.5.13 and paragraphs 6.5.14 to 6.5.21. Listed buildings and conservation areas often form integral elements, or sometimes, key characteristics, in historic landscapes. However, the advice in this Guide does not affect or alter the provisions of these documents, which should continue to be applied to listed buildings and conservation areas within historic landscape areas on the Register.
- 2.3 Advice on the role of World Heritage Sites in the planning process is given in Welsh Office Circular 61/96 Planning and the Historic Environment: Historic Buildings and Conservation Areas, paragraphs 13, 14 and 15; and in Welsh Assembly Government Planning Policy Wales, March 2002, paragraphs 6.5.22. Most World Heritage Sites in Wales are within historic landscapes; however, the advice in this Guide does not affect or alter the provision of these documents, which should continue to be applied to the World Heritage Sites within historic landscape areas on the Register.
- 2.4 Advice on the role of archaeology in the planning process is given in Welsh Office Circular 60/96 Planning and the Historic Environment: Archaeology, and in Welsh Assembly Government Planning Policy Wales, March 2002, paragraphs 6.5.1 to 6.5.6. Archaeological sites often form integral elements, or sometimes, key characteristics, in historic landscapes. However, the advice in this Guide does not affect or alter the provisions of these documents, which should continue to be applied to archaeological sites within historic landscape areas on the Register.
- 2.5 Information on how the Register may be used is set out, in detail, in its introduction, with a supplement of additional,

updated information included in the introduction to Part 2.2. It is important, however, to emphasize that the Register does not impose statutory controls and areas on it are not 'designated'. The latest guidance given to planning authorities on the use of the Register is set out in Welsh Assembly Government *Planning Policy Wales*, March 2002, paragraph 6.5.23 which states:

'Information on the landscapes on the second part of the Register should also be taken into account by local planning authorities in preparing UDPs and emerging Local Development Plans, and in considering the implications of developments which are of such a scale that they would have more than local impact on an area on the Register.'

- 2.6 Such developments should be considered on a case-by-case basis, but generally may be defined as, but are not confined to:
- major communications schemes (road, rail, sea, air, or inland waterway);
- · quarrying and opencast mining;
- major settlement;
- major leisure developments;
- large-scale industrial, processing, manufacturing or commercial expansion;
- large-scale landfill and reclamation, waste disposal or recycling schemes;
- major drainage, coastal defence and flood prevention works;
- power generation, storage and distribution projects;
- major water abstraction, treatment or supply schemes;
- other similar, large-scale infrastructure projects;
- afforestation or other extensive agricultural land use changes;
- intensive agriculture or aquaculture projects.
- 2.7 Information on the Register should also be taken into account when considering developments that are not in themselves large-scale or extensive, but are of a radical nature and likely to cause unacceptable change when considered in relation to the nature and quality of the existing key historic elements or characteristics in the landscape area on the Register.
- 2.8 Certain types of developments require Environmental Impact Assessment (EIA) to be undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999–SI 1999 No 293 (EIA Regulations). Guidance on the application of the EIA Regulations in Wales is given in Welsh Office Circular 11/99 Environmental Impact Assessment. EIA Regulations Schedule 4 (as reproduced in Circular 11/99, p. 47, Annex C) sets out the information to be included in an Environmental Statement, section 3 of which requires:

'A description of the aspects of the environment likely to be significantly affected by the development... including the architectural and archaeological heritage, and landscape.'

This includes the historic landscape areas on the Register.

- 2.9 With rare exception all developments of the type listed in 2.6 will de facto require EIA because of their nature and scale. In other cases, each development will be considered for EIA on its own merits, and the more environmentally sensitive the location, the more likely it is that the effects will be significant and will require EIA. The fact that a location occurs within a historic landscape area on the Register should be considered as increasing its overall environmental sensitivity and, consequently, the necessity for EIA as required in EIA Regulations Schedule 3 in respect of 'landscapes of historical, cultural or archaeological significance' (Circular 11/99, p. 46, Criterion 2 (c) (viii)). Planning or other competent authorities should take this into account when screening applications to determine the need for EIA with, if required, advice from Cadw, CCW and the Welsh Archaeological Trusts.
- 2.10 In the light of the Rochdale ruling (High Court: Crown v. Rochdale Metropolitan Borough Council, 7/5/1999), when EIA is required, fixed development within a historic landscape area on the Register requires a meaningful assessment process that is identified when the EIA is scoped. When EIA is required for a development within a historic landscape area on the Register, therefore, planning or other competent authorities in agreeing the scope of works should require assessors to use the methodology set out in the Technical Annex for assessing the significance of the impacts of the proposal on the historic landscape area.
- 2.11 Where EIA is not necessary, it is a matter for the discretion of the planning or other competent authority to determine the level of an Assessment of the Significance of the Impact of Development on Historic Landscape areas on the Register (ASIDOHL2) it considers desirable when considering a development proposal which is of such a scale, or of a radical nature, that it is likely to have more than local impact on an area on the Register. A particular development may be considered to require the full ASIDOHL2 process outlined in the Technical Annex or, alternatively, the nature of the development may require the application of only part of the ASIDOHL2 process. Detailed advice should be obtained from Cadw, CCW and the Welsh Archaeological Trusts.
- 2.12 Whereas the advice in this Guide and Technical Annex is designed to assist the process of establishing interests and assessing the significance of impacts,

it does not provide options for the consideration of any mitigation or positive benefits that may be offered through the restoration or enhancement of elements. These issues should be separately assessed, preferrably relying on the results of a completed ASIDOHL2 exercise (see Technical Annex, 'Mitigation', p. 30).

3.0 The Historic Landscape Characterization programme

- 3.1 In parallel with the creation of the Register, Cadw and the Welsh Archaeological Trusts are undertaking a follow-up programme of Historic Landscape Characterization in Wales. The programme gathers together more detailed information about each area on the Register, and it is designed to cater for a variety of needs, but primarily to provide information for landscape conservation and management as, for example, may be required in the Tir Gofal agri-environment scheme.
- 3.2 Information is gathered in such a way as to be compatible and interchangeable with the historic landscape aspect in CCW's *LANDMAP* programme, so that the results of a characterization study can be directly fed into a *LANDMAP* exercise and vice versa. In so far as this Guide is concerned, information from characterization should always be used for an ASIDOHL2, as set out in the Technical Annex to this Guide.
- 3.3 CCW, University College, Dublin and Brady Shipman Martin, Dublin, working in partnership, with funds from the INTERREG II European Regional Aid Fund, have produced a *Guide to Best Practice in Seascape Assessment* (The Marine Institute, Dublin, 2001). Seascapes assessment takes account of historical and cultural issues and it is intended that assessment studies will eventually be available for the whole of the Welsh coastline. Organizations or individuals undertaking ASIDOHL2 in coastal areas should contact CCW for details of the latest seascape information available. Also relevant in this context is the *Guidance on the Assessment of the Impact of Offshore Wind Farms: Seascape and Visual Impact Report* (Report by Enviros Consulting for the Department of Trade and Industry, 2005).

4.0 How Historic Character Areas are identified

4.1 The characterization process divides each landscape area on the Register into a number of smaller, more discrete, geographical areas of broadly consistent historic character called 'Historic Character Areas'. These areas are defined according to their key historic elements or characteristics,

for example, an area might be physically characterized by

a particular form of historic settlement or land use pattern, or it might have distinctive historic buildings, archaeological sites or traditional field boundaries, or it might contain important ancient habitats, and so on. Alternatively, an area might not have any strongly definitive physical characteristics, but instead it might have significant historic documentary evidence relating to it, or have important historic associations, and so on.

4.2 All of these elements or characteristics can occur either singly or in combination. In some cases, an area might be characterized by a range of elements that are not necessarily similar, but together demonstrate a particular land use theme or process; for example, defence, industry, communications, land enclosure, landscape planning or ornamentation, and so on. One theme may be dominant or several might have been at work at the same, or at different times. Grouping elements and characteristics together under land use themes greatly increases our capacity to understand the historical development of the landscape. The understanding we gain is a key characteristic in its own right and one of the principles that underpins the identification of historic landscapes (section 6.2).

5.0 Getting information on Historic Landscape Characterization and Historic Character Areas

- 5.1 The characterization programme is progressing towards coverage of all areas on the Register. Its results are available on the Welsh Archaeological Trusts' websites, as well as in paper volumes available for inspection at the offices of the Welsh Archaeological Trusts and Cadw. Relevant addresses are given in the Appendix.
- 5.2 In the few historic landscape areas on the Register where characterization reports are not yet available, and where an ASIDOHL2 is required, it is recommended that an ASIDOHL2 should be undertaken in relation to 'Provisional Historic Character Areas'. Provisional Historic Character Areas are identified during the preparation of characterization reports and the Welsh Archaeological Trusts can supply details of these. Where characterization reports are not yet available, but a LANDMAP exercise has been undertaken, the Level 4 'historic landscape aspect areas' identified in LANDMAP may qualify as Provisional Historic Character Areas, subject to the endorsement of the Trust concerned. Where Provisional Historic Character Areas have not yet been identified, the Trusts can advise on a suitable methodology, or can be commissioned to identify Provisional Historic Character Areas as a prerequisite for an ASIDOHL2..

6.0 Key principles underpinning the identification of historic landscapes

- 6.1 This Guide and the advice in it have to be considered in the context of the three key principles underpinning the identification of historic landscape areas on the Register, namely:
- 6.2 The Register promotes the conservation of the key characteristics of historic landscapes as those landscapes evolve. While the Register recognizes that historic landscapes must inevitably evolve to meet the needs of the people who sustain and live in them, it is hoped that this can be achieved with the fullest possible regard for the conservation of their key historic characteristics. Here, the term 'characteristics' is taken in the broadest sense. It includes not only the physical elements of the past that survive, like individual sites, monuments or other features noted in section 4.0, but also the spaces in between and the resulting patterns formed in the landscape. The survival and appreciation of these spatial characteristics is crucial because, like the land use themes identified during characterization, they greatly increase our capacity to understand how individual sites or monuments functioned and how they were related physically, visually and through time. How much and how well we are able to understand and appreciate the historical meaning and significance of the landscape is a key characteristic in its own right. This ties in with the second principle.
- 6.3 The conservation of historic landscapes is about ensuring the transfer of maximum historic meaning and value when contemplating landscape change. Our capacity to understand and appreciate the historical development of the landscape should not be thwarted by inappropriate or insensitive change. This carries with it the need to assess the potential effects of a development, in terms of any lasting alteration it will cause, in relation to the whole of the historic landscape on the Register, not just the elements or characteristics directly affected in the 'footprint' area. This ties in with the third principle.
- 6.4 Key historic characteristics within historic landscapes, like historic buildings or archaeological sites, are irreplaceable. Their removal, loss, degradation, fragmentation, or dislocation cannot be mitigated in the same way as a habitat or a natural feature might be restored or recreated. The effects of direct, physical impacts are irreversible, but equally damaging, indirect impacts can occur through the severance or disruption of the functional or visual connections between elements, or

through the consequential degradation of the visual or other amenity of elements, or through a combination of these factors. This relates back to the second principle because, through indirect impacts, developments can have an adverse effect on the amenity and value of the landscape well beyond the site of the development itself. Piecemeal development over time can have an equally adverse effect resulting from a cumulation, or a combination of direct and indirect impacts.

7.0 Guidance on determining landscape edges and on the status of recent elements or characteristics in the landscape areas on the Register

7.1 It is widely accepted that it is difficult to determine precise edges to landscapes. Although landscapes are real in the sense that they are made up of solid objects and spaces, they are also subjective and their extents as humanly perceived, will invariably involve a degree of individual opinion or expediency. Towards the limits of any given area of interest in a landscape, therefore, the question can always be asked whether a particular element is included or excluded. These constraints apply to the landscape areas on the Register.

7.2 In order to assist planning authorities and others who require more precision in their work, this section gives guidance about determining the edges of the landscape areas on the Register, the edges of the Historic Character Areas identified by characterization and the relationship between the two.

7.3 A pragmatic and common sense approach was adopted for determining the broad extents of the landscape areas on the Register. The methodology is explained in detail in the introduction to the Register (Part 2.1, pp. xxx–xxxi, 'Defining the areas'). In summary, the nature of the historic interest concerned determined the extent of the landscape areas on the Register and, in many cases, because of Wales's varied topography, the landscape areas coincided with the physical limits of natural features like mountains, valleys, basins, promontories and so on.

7.4 By their very nature and much smaller scale, the edges of Historic Character Areas will be drawn to coincide with the geographical or physical limits of their characteristics. In most cases, this will have the effect of producing precise edges that can be shown as hard lines on maps. However, these should not be taken as representing the edges of the landscape areas on the Register.

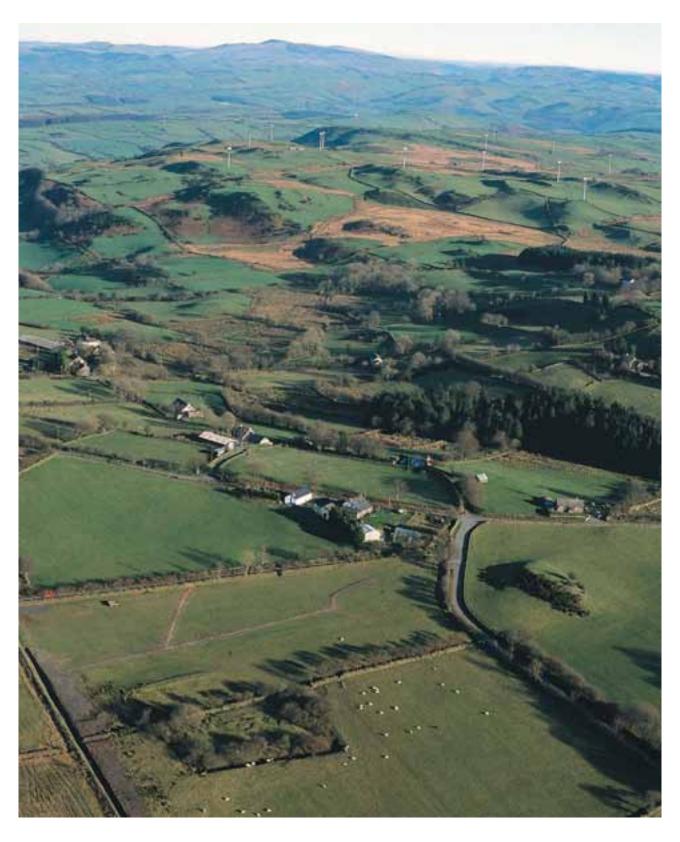
7.5 Although there may appear to be a coincidence in their edges, the characterization programme has shown that in some landscape areas on the Register, particularly those identified under Criterion 3 — Historic diversity/ Multiperiod, Historic Character Area edges can fall outside the extent of the landscape area on the Register. This is because Historic Character Areas are identified at a much smaller scale and at a much greater level of detail than was possible for the landscape areas on the Register, and where there is a great degree of diversity, edges can be drawn at a number of places depending on which characteristic is selected as being the most dominant.

7.6 In order to resolve this potential ambiguity, the following guidance is offered. In planning terms, the status of the Register is non-statutory, and this includes information from characterization that is intended to support the Register. The extent of the landscape areas on the Register and Historic Character Areas are, therefore, indicative and advisory only.

7.7 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 characterization 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.

7.8 Another potential ambiguity or misunderstanding can arise over the presence in landscape areas on the Register of recent elements or characteristics that may be of little, if any, historic interest. As excluding these elements or characteristics would have been impossible and rather meaningless in landscape terms, the Register adopted a pragmatic approach by assuming that 'history started yesterday' (Part 2.1, p. xxii, 'Criteria for landscapes of outstanding or special historic interest'). While this assumption may be theoretically correct, it is not really helpful in planning terms. Reference to recent elements or characteristics in landscape areas on the Register, therefore, should not be interpreted as placing undue weight on their intrinsic importance, but rather as focusing on their wider role in contributing to landscape diversity and continuity over a much longer time span. It will, therefore, be a matter for the planning or other competent authority undertaking an EIA, or the Public Inquiry Inspector concerned, to decide on a case-by-case basis what emphasis to place on the contribution made by recent elements or characteristics to the landscape areas on the Register.

TECHNICAL ANNEX



Windfarms, like this one at Llangwyryfon in the Upland Ceredigion Historic Landscape, are one of the types of development within an area on the Register requiring an ASIDOHL2 assessment. The Trefenter medieval moated site, which is a scheduled ancient monument, can be see in the foreground (© RCAHMW).

THE ASIDOHL2 PROCESS: A STAGED PROCESS FOR THE ASSESSMENT OF THE SIGNIFICANCE OF THE IMPACT OF DEVELOPMENT ON HISTORIC LANDSCAPE AREAS ON THE REGISTER OF LANDSCAPES OF HISTORIC INTEREST IN WALES

Introduction

The staged process recommended in this Technical Annex for the assessment of the significance of the impact of development on historic landscape areas on the Register (ASIDOHL2), is intended to be used by archaeologists with historic landscape expertise or for landscape practitioners familiar with landscape approaches to the historic environment.

Guidance on the application of the process and on the technical steps involved should be sought in the first instance from the Welsh Archaeological Trusts. They will also be able to advise on the latest revisions and provide, through their websites, blank proformas of the tables used at each stage of the assessment process.

It is intended that the process will continue to be regularly updated to reflect practical experience gained.

To this end, the sponsoring bodies would welcome any comments or suggestions on its operation.

In most cases, an assessment can be primarily based on a desk-top study and analysis of all the relevant information, supported by site visit(s) (including, where necessary, fieldwork to establish the 'Provisional Historic Character Areas' noted in section 5.2) and the production of a written report. These guidelines apply to these cases only. In all other cases where, for example, substantial departures from the guidelines may be required, it is recommended that any changes and variations are discussed and agreed in advance with Cadw, CCW and the curatorial section of the relevant Welsh Archaeological Trust.

Taking the Historic Character Areas derived from the characterization programme as the 'building blocks' of the historic landscape areas on the Register, it is recommended that the ASIDOHL2 process and report should be structured into five main stages:

TABLE 1

ASSESSMENT OF THE SIGNIFICANCE OF THE IMPACT OF DEVELOPMENT ON HISTORIC LANDSCAPE AREAS ON THE REGISTER OF LANDSCAPES OF HISTORIC INTEREST IN WALES - ASIDOHL2

SUMMARY OF STAGES

STAGE 1 Compilation of	f an introduction of	f essential, contextua	l information.
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STAGE 2 Description and quantification of the direct, physical impacts of development on the Historic Character Area(s) affected.

Description and quantification of the indirect impacts of development on the Historic Character

STAGE 3 Area(s) affected.

STAGE 4 Evaluation of the relative importance of the Historic Character Area(s) (or part(s) thereof) directly and/or indirectly affected by development in relation to:

- (a) the whole of the Historic Character Area(s) concerned, and/or
- (b) the whole of the historic landscape area on the Register, followed by
- (c) an evaluation of the relative importance of the Historic Character Area(s) concerned in the national context, and a determination of the average overall value of all the Historic Character Areas (or parts thereof) affected.
- STAGE 5 Assessment of the overall significance of impact of development, and the effects that altering the Historic Character Area(s) concerned has on the whole of the historic landscape area on the Register.

STAGE 1 Contextual information

The first stage of the ASIDOHL2 process is to gather essential, contextual information that should provide and form the introduction to the report. This information should include:

- (a) A brief summary description of the development, with a map at the appropriate scale showing its location in relation to the historic landscape area on the Register.
- (b) A statement about the context in which the ASIDOHL2 is being done, for example, as part of EIA, a feasibility study for development, as part of evidence to be presented at a Public Inquiry etc.
- (c) If relevant, a brief summary of the planning history of the site (details of any previous permissions, appeals etc.).
- (d) References to any related assessments, for example, a *LANDMAP* study, an archaeological assessment under the provisions of Welsh Office Circular 60/96, EIA, or a previous assessment etc.
- (e) A summary of the national, regional and local planning policies in relation to historic landscapes in the development area (Welsh Assembly Government planning guidance, Unitary Development Plans, emerging Local Development Plans, etc.)
- (f) In the relevant cases, an indication of the provisional status of any Historic Character Areas (see section 5.2).
- (g) An indication of the confidence levels of the data upon which the ASIDOHL2 is based and any resulting limits assigned to impact predictions, either because of techniques used or because of the limits of information available, timing or personnel used, inability to gain access to the land or data involved, and whether there are any contingent, or other, liabilities, issues of confidentiality, copyright relating to the data etc.
- (h) A statement on the qualifications and experience of the person(s) responsible for undertaking the ASIDOHL2 and a full declaration of the nature of any contractor– client relationships.
- (i) A description of the process used, work undertaken, the area over which impacts have been assessed, sources consulted, site visits etc., and an indication of the ASIDOHL2 stages undertaken.

Copies of the historic landscape citation in the Register, the descriptions of the Historic Character Area(s) affected and any other relevant supporting information, maps, photographs etc. should normally be included as appendices to the ASIDOHL2 report.

STAGE 2 Assessment of direct, physical impacts of development

The second stage of the ASIDOHL2 process and report should describe and, as far as possible, quantify the direct, physical impacts of the development on the Historic Character Area(s) affected using the following framework.

A map should be provided at the appropriate scale showing the precise location and extent of the development, including any preliminary site works or supporting infrastructure necessary, in relation to the Historic Character Area(s) directly affected.

Where there are large amounts of information or clarity is an issue, supplementary map(s) can be provided to show the location of Scheduled Ancient Monuments, Listed Buildings, Conservation Areas, Parks and Gardens of Special Historic Interest, and any other coincident statutory, nature conservation or landscape designations; the location of any known, non-scheduled archaeological sites and monuments, non-listed historic buildings or structures; traditional boundaries, or any other key historic elements or characteristics identified in the characterization report. Wherever possible, the Primary Record Numbers (PRNs) assigned in the regional Historic Environment Records maintained by the Welsh Archaeological Trusts, should be quoted. (The distinction between elements and characteristics is not critical. In the context of an ASIDOHL2 exercise and its consituent stages, they are not mutually exclusive and reference is drawn to the definitions set out in sections 4.1, 4.2 and 6.2.) Direct, physical impacts should be described and quantified in three ways, namely:

(a) In absolute terms

This should be expressed as a statement indicating the actual percentage or proportion of the surface area of the Historic Character Area that is directly affected, for example, '55% (or just over half) of the area of Historic Character Area X will be permanently lost or removed by development.' (In some cases, the percentage surface area affected could be greater than the physical extent of the development if, for example, a construction land-take greater in area than, or separate from, the development site is required for extensive preliminary site works, ancillary developments or supporting infrastructures.)

(b) In relative terms

This should be expressed with statements indicating the percentages or proportions of the known resource (i.e. the key elements or characteristics identified by characterization) that will be permanently lost or removed by development, for example, 'In Historic Character Area X, 25% (or a quarter) of, for example, the number of known archaeological sites;

the extent of historic land use or pattern in area A; the length of linear feature B, and so on, will be permanently lost or removed by development.

In both (a) and (b), the overall magnitude of direct, physical impacts should be graded as:

TABLE 2

ASIDOHL2 STAGE 2: GRADES OF DIRECT PHYSICAL IMPACTS

75-100%	permanently lost or removed	Very Severe;
50-74%	permanently lost or removed	Severe;
30-49%	permanently lost or removed	Considerable;
15-29%	permanently lost or removed	Moderate;
5-14%	permanently lost or removed	Slight;
0-4%	permanently lost or removed	Very Slight.

The intrinsic importance or status of each element or characteristic affected should also be assessed and briefly described and recorded using the categories adopted by the Welsh Archaeological Trusts, namely:

Category A Sites and Monuments of National Importance

This includes Scheduled Ancient Monuments (SAMs), Grade I and II* (and some Grade II) Listed Buildings and sites of similar quality, i.e. those which would meet the requirements for scheduling or listing at the top two grades. There is a presumption in favour of preservation of all such sites and their settings should they come under threat. Such sites might include those that survive principally as buried remains.

Category B Sites and Monuments of Regional Importance

This includes sites that would fulfil the criteria for listing at Grade II (if a building), but not for scheduling (if a relict archaeological site). Nevertheless, such sites are of particular importance within a regional context and, if threatened, should ideally be preserved in situ, although complete excavation and/or recording may be an acceptable alternative. Most sites of archaeological and/or historical interest will fall within this category.

Category C Sites / Features of Local Importance

This category includes components of the historic environment (such as walls, gateposts, tracks etc.) that help define local distinctiveness and character. They may not be of sufficient importance to justify a recommendation for preservation if threatened, but they nevertheless have an interest and

importance in their local context.

Category D Minor and Damaged Sites / Features

This category includes sites / features which are of minor importance or so badly damaged that too little remains to justify their inclusion in a higher category. Rapid recording, either before or during destruction, is usually sufficient for this category of site.

Category U Sites / Features Needing Further Investigation

Sites / features whose character, importance or location is undetermined are placed in this category. They include buried sites and known underground features identified from archival evidence and retrospective map analysis, sites with no defined physical presence such as find spots, sites noted but not accurately located in antiquarian references, sites known only from place-name evidence and other sites reported at the specified location, but cannot be verified by archaeological fieldwork. They will require further work before they can be allocated to Categories A–C.

Where large areas are involved, or where there is a high concentration of elements as, for example, in industrial or urban areas, it is suggested that groups of similar, or related, elements are brought together and considered as a single element or characteristic, provided this is clearly stated in the report. The emphasis should be on Category A and B and closely linked, or groups of, Category C sites.

(c) In landscape terms

As well as the intrinsic importance or value recorded in step (b), account should also be taken of the extrinsic importance of elements or characteristics within the landscape of the Historic Character Area. Extrinsic importance reflects the contribution the individual element or characteristic makes to the value of the Historic Character Area as a whole. The Historic Character Area will have a value in excess of the combined values of the individual elements or characteristics that make it up, on the basis that 'the sum of the whole is greater than the sum of the individual parts'. Elements or characteristics need not necessarily be similar, and may even be quite diverse, but as part of a landscape, they will have a measure of extrinsic, as well as of intrinsic, importance.

Extrinsic importance is not to be confused with the 'Group Value' of closely related elements or characteristics in Historic Character Areas where a single land use theme or process is dominant. Group value relates to mainly functional links and interconnections that occur between individual elements, and will depend on how well the links have survived.

Examples would be groups consisting of elements with a similar morphology, chronology and function (e.g. a cairnfield), or of elements with a dissimilar morphology, but sharing a clear past interconnectivity (e.g. an ironworks and its related water management system, adits/levels/mineshaft, tramroad/railway, waste tips and perhaps also workers' housing).

Clearly, the distinction between 'Extrinsic Importance' and 'Group Value' will to some extent depend on the scale and level of detail at which (a) elements or characteristics and (b) Historic Character Areas have been identified. However, in this stage of the ASIDOHL2 process, the emphasis should be on determining the extrinsic, or landscape value of elements or characteristics, whether or not they are individually made up of groups of smaller-scale features that have a high, intrinsic group value. However, high intrinsic group value may well enhance an element's extrinsic, or landscape importance overall, especially in areas with a high density of related features.

The extrinsic, or landscape importance of the elements identified should be graded as 'Very High'; 'High'; 'Considerable'; 'Medium'; 'Low', or 'Very Low'; together with an indication of the type of group to which it belongs, for instance, as in the examples given above.

The effect the development would have on the extrinsic importance of the element or characteristic as a whole should then be assessed. This should reflect what effects the loss of element X (or part thereof) would be on the landscape of Historic Character Area Y where X is found. In other words, by how much does the loss of X diminish the value of Y as a landscape? Effects should be graded as a 'Landscape Value' that is 'Lost'; 'Substantially Reduced'; 'Considerably Reduced'; 'Moderately Reduced'; 'Slightly Reduced', or 'Very Slightly Reduced'.

In order to determine the overall magnitude of direct, physical impacts on a Historic Character Area, and for the results to be transparent and meaningful for planning and development purposes, impact magnitudes should be weighed up with element sensitivity (i.e. an element's intrinsic and extrinsic importance or status), using the following scoring system:

TABLE 3 ASIDOHL2 STAGE 2: DIRECT PHYSICAL **IMPACTS – GRADES AND SCORES** IMPACTS AND ELEMENT SENSITIVITY SCORE Direct physical impacts - absolute Very Severe 6 Severe 5 Considerable 4 Moderate 3 Slight 2 Very Slight 1 Direct physical impacts - relative Very Severe 6 Severe 5 Considerable 4 Moderate 3 Slight 2 Very Slight 1 Site category 4 Α R 3 C 2 D 1 U 1 Direct physical impacts — landscape value Very High 6 High 5 Considerable 4 Medium 3 Low 2 Very Low 1 Landscape value effect 6 Lost 5 Substantially Reduced Considerably Reduced 4 Moderately Reduced 3 Slightly Reduced 2

Very Slightly Reduced

1

Template available at www.cadw.wales.gov.uk

The results for each Historic Character Area affected could be summarized in a table, for example:

TABLE 4

ASIDOHL2 STAGE 2: ASSESSMENT OF DIRECT, PHYSICAL IMPACTS ON HISTORIC CHARACTER AREA X

ABSOLUTE IMPACT (LOSS OF AREA)

48 ha, 55% area

MAGNITUDE & SCORE

Severe — 5

RELATIVE AND LANDSCAPE IMPACTS (LOSS OF KNOWN ELEMENTS OR CHARACTERISTICS) & SCORES

ELEMENT / % LOSS	CATEGORY	MAGNITUDE	LANDSCAPE VALUE	LANDSCAPE VALUE EFFECT
Tramway R — 0.3km length, 15%	B — 3	Moderate — 3	High — part of quarry complex G — 5	Slightly Reduced — 2
Field System Y — 2.3 ha, 85%	C – 2	Very Severe — 6	High — part of settlement cluster $P - 5$	Substantially Reduced — 5
Hut Platforms A — 4 sites, 30%	A — 4	Considerable —	Medium — part of settlement R — 3	Moderately Reduced — 3
Crop-mark complex B — 1.0 ha, 65%	A (SAM) — 4	Severe — 5	High — part of ritual complex T — 5	Lost — 6
Ancient Woodland C — 0.3 ha, 3%	B-3	Very Slight — 1	Very low — 1	Very Slightly Reduced — 1

The scores for each element (i.e. Status [Category] + Magnitude + Landscape Value + Landscape Value Effect) are added up to produce a combined total. This figure is then divided by the number of elements identified, in order to obtain an average figure. In the example shown above this would be:

(3+3+5+2) + (2+6+5+5) + (4+4+3+3) + (4+5+5+6) + (3+1+1+1)Divided by 5 = 14.2

This average score is then added to the score for the magnitude of absolute impact, which in this case is 5:

14.2 + 5 = 19.2, rounded off to the nearest whole number = 19

On a 28-point scale, which is the maximum possible, this figure provides a measure of the overall magnitude of direct, physical impacts on Historic Character Area X. Scores are then graded according to the following scale:

TABLE 5

ASIDOHL2 STAGE 2: OVERALL MAGNITUDE OF DIRECT PHYSICAL IMPACTS

SCORE	GRADING
24–28	Very Severe
19–23	Severe
14–18	Considerable
9–13	Moderate
4–8	Slight
0-3	Very Slight

In the example shown, therefore, a score of 19 equates with a 'Severe' overall magnitude of direct, physical impact on Historic Character Area X.

STAGE 3 Assessment of indirect impacts of development

Clearly, a finite area of land will be directly and physically affected by a development, but a much greater area will be indirectly affected through the fragmentation of Historic Character Areas, visual intrusion and encroachment that could devalue the historic landscape area on the Register as a whole. The importance of 'setting' is a well-established criterion in the assessment of the significance of impact of development on Scheduled Ancient Monuments and Listed Buildings, and the same criterion should be applied to Historic Character Areas and to historic landscape areas on the Register.

There is no statutory definition of setting, but it could be considered as having two principal dimensions. Firstly, there is the immediate or essential setting which, in the case of a building, would be the ancillary land used with it or the curtilage. Secondly, there is the wider setting that, in the case of a building, may or may not be legally attached to it, may or may not be used with it, and is often part of the built environment or part of the countryside. Settings may not be as easily defined for field monuments, but it may be possible to make reasonable inferences based on archaeological, or historical, information. Setting should not be interpreted too narrowly, and for the purposes of this process, impacts on settings will be categorized as 'indirect' impacts.

The third part of the ASIDOHL2 report should, therefore, describe and quantify as objectively as possible the indirect impacts of the development on all Historic Character Areas affected.

Indirect impacts can be categorized as being mainly physical or visual in nature.

(a) Indirect, physical impacts

These can occur to elements in a Historic Character Area

as a result of one, or a combination, of the following factors:

- (i) An increased risk of exposure, erosion, disturbance, decay, dereliction or any other detrimental physical change to elements, during or consequent to development.
- (ii) Related to (i), the likelihood of increased management needs to maintain elements as, for example, through altered habitats, water levels, increased erosion, new access provision etc., during or consequent to development.
- (iii) The severance, fragmentation, dislocation or alteration of the functional connections between related elements, for example, a field system becomes 'severed' from its parent farmstead by an intervening development. This includes 'severance' from related elements in adjacent, or other, geographically removed but still functionally linked, Historic Character Areas, which large-scale developments might cause in archaeologically or historically complex landscapes.
- (iv) The frustration or cessation of historic land use practices, for example, it becomes more difficult or impossible to manage an area in a traditional manner as a result of development.
- (v) The frustration of access leading to decreased opportunities for education, understanding or enjoying the amenity of elements, during or consequent to development.

Each category of indirect, physical impact identified should be described and an assessment made of its severity, based on professional judgement, and graded as follows: 'Very Severe'; 'Severe'; 'Considerable; 'Moderate'; 'Slight', or 'Very Slight'. In order to determine the overall magnitude of indirect, physical impacts on a Historic Character Area, impact magnitudes should be weighed up with element sensitivity (i.e. an element's intrinsic importance or status), using the same grades and scores as for Stage 2 (i.e. the first three ranges in Table 3, p. 18).

The results for each Historic Character Area affected could be summarized in a table, for example:

TABLE 6

ASIDOHL2 STAGE 3: ASSESSMENT OF INDIRECT, PHYSICAL IMPACTS ON HISTORIC CHARACTER AREA Y

IMPACTS	CATEGORY & SCORE	MAGNITUDE & SCORE
Increased risk of erosion to element J	B - 3	Moderate — 3
Increased management needs for element K	C - 2	Slight — 2
Functional connection between elements J & K disrupted	A - 4	Severe — 5
Traditional land use of area L ceased	A - 4	Very Severe — 6
Amenity value of element M reduced	C - 2	Moderate — 3

The scores for each element (i.e. Status + Magnitude) are added up to produce a combined total. This figure is then divided by the number of elements identified in order to obtain an average figure. In the example shown above, this would be:

$$(3+3) + (2+2) + (4+5) + (4+6) + (2+3)$$

Divided by $5 = 6.8$

This average score will be required at the end of Stage 3 in order to calculate the overall magnitude of indirect impacts on the Historic Character Area.

(b) Indirect (non-physical) visual impacts

These can occur to elements as a result of one, or a combination, of the following factors:

(i) Visual impacts on elements from which a development can be seen (considered up to its maximum height). The impact might be on 'views to' or 'views from' these elements, and it should be assessed with reference to key historic viewpoints and essential settings. These should be considered in relation to a site's original character and function, as well as to the vantage points and visual experience of a visitor today.

Determining these aspects in relation to field monuments can be difficult, especially where the key historic viewpoints and essential settings recognized today may be different to those that were important to the original builders or inhabitants of a site. However, it might be possible to make reasonable assumptions on the basis of what is known archaeologically, or historically, about how certain types of monuments originally functioned, or were regarded. Key viewpoints should also include those that subsequently became adopted as such, for example, the historic, artistic, viewpoints of a site, or those that were deliberately created as features in historic parks and gardens.

- (ii) Impact on the visual connections between related elements, by occlusion, obstruction, etc., for example, an essential line of sight between historically linked defensive sites will become blocked or impaired by an intervening development.
- (iii) Conversely, the creation of inappropriate visual connections between elements not intended to be inter-visible originally, by the removal of intervening structures, barriers, shelters, screening or ground.
- (iv) Visual impact of the development itself in relation to the existing historic character of the area considering:

- its form the scale, number, density, massing, distribution etc., and if appropriate, the movement of its constituent features;
- its appearance the size, shape, colour, fabric etc. of its constituent features.

This section is aimed at assessing to what extent the development constitutes a visual intrusion or encroachment, and to what extent that affects the area's historic character.

NOTE: The Landscape Institute and the Institute of Environmental Management and Assessment have jointly published *Guidelines for Landscape and Visual Impacts Assessment* (E. & F. N. Spon Press, London, 2002, second edition). This may usefully be consulted; however, software packages are now available that can make use of OS digital data to produce 360-degree view-shed analysis, 3-D virtual representations and so on (e.g. Vertical Mapper for MapInfo; Visual Nature Studio 2 etc.). In complicated cases, or where the development is on a very large scale, it may be necessary to use the services of a professional landscape architect to undertake a full visual impacts assessment.

Each type of indirect, visual impact identified should be described using maps, figures, diagrams, elevations and photographs (photo montages may be particularly useful) as necessary. Assessment should be generally confined to the key elements identified during characterization within the affected area(s), i.e. Category A and B sites and closely linked, or groups of, Category C sites (as defined in Stage 2 above), with an assessment of the severity of impact based on professional judgement, and graded as follows: 'Very Severe'; 'Severe'; 'Considerable; 'Moderate'; 'Slight', or 'Very Slight'. Development form and appearance should be similarly graded.

In order to determine the overall magnitude of the indirect, visual impacts on a Historic Character Area, impact magnitudes should be weighed up with element sensitivity (i.e. an element's intrinsic importance or status), using the same grades and scores as for Stage 2 (i.e. the first three ranges in Table 3, p. 18). Development form and appearance are graded in relation to the average value of element sensitivity for the Historic Character Area.

The results for each Historic Character Area affected could be summarized in a table, for example:

TABLE 7

ASIDOHL2 STAGE 3: ASSESSMENT OF INDIRECT, VISUAL IMPACTS ON HISTORIC CHARACTER AREA Y

IMPACTS	CATEGORY & SCORE	MAGNITUDE & SCORE				
Views to element N partially blocked	A - 4	Slight — 2				
Views from element P disrupted	B - 3	Severe — 5				
Small-scale change to essential settings of element R	A - 4	Slight — 2				
Visual connection between elements T and S occluded	B - 3	Very Severe — 6				
Development form	3.5*	Severe — 5				
Development appearance	3.5*	Moderate — 3				
*Average value of element sensitivity – $(4+3+4+3) \div 4 = 3.5$						

The scores for each element (i.e. Category + Magnitude) are added up to produce a combined total. This figure is then divided by the total number of elements identified, including development form and appearance, in order to obtain an average figure. In the example shown above, this would be:

$$(4+2) + (3+5) + (4+2) + (3+6) + (3.5+5) + (3.5+3)$$

Divided by $6 = 7.33$

This average score is then added to the score for the indirect, physical impacts, which in the calculation on p. 21 came to 6.8:

$$7.33 + 6.8 = 14.13$$

This figure is on a scale of 1–20, which is made up of the 10 maximum possible average scores for indirect, physical impacts and the 10 maximum possible average scores for indirect, visual impacts. Unfortunately, this scale cannot conveniently be divided into six whole number ranges as is the case with the 28-point scale used in Stage 2 (Table 5, p. 19). To overcome this difficulty, the average score is simply multipled by 28 and then divided by 20, to convert it to the 28-point scale.

The calculation is as follows:

14.13 x 28

Divided by 20 = 19.78, rounded off to the nearest whole number = 20

This score provides a measure of the overall magnitude of indirect (physical and visual) impacts on the Historic Character Area, which is then graded according to the same scale as used in Stage 2, namely:

TABLE 8

ASIDOHL2 STAGE 3: OVERALL MAGNITUDE OF INDIRECT IMPACTS

SCORE	GRADING
24–28	Very Severe
19–23	Severe
14–18	Considerable
9-13	Moderate
4–8	Slight
0–3	Very Slight

In the examples shown, therefore, a score of 20 equates with a 'Severe' overall magnitude of indirect, physical impact on Historic Character Area Y.

The types of indirect impacts described above are by no means exhaustive, and there may be others specific to particular kinds of development that should also be taken into account and assessed. Each impact identified should be described and quantified as objectively as possible, with written descriptions supported by diagrams or photographs, particularly for visual impacts. Where accurate quantification is impossible, a professional judgement should be given.

Because there is the potential for the full range of indirect impacts not to be recognized and for some of the Historic Character Areas affected to be missed and not taken into account, it is strongly recommended that all the impacts and areas are identified and agreed in advance with Cadw, CCW and the curatorial section of the relevant Welsh Archaeological Trust.

STAGE 4 Evaluation of relative importance

The fourth stage of the ASIDOHL2 process and report should evaluate the relative importance of the Historic Character Area(s) (or part(s) thereof) directly and/or indirectly affected by development in relation to:

- (a) the whole of the Historic Character Area(s) concerned, and/or
- (b) the whole of the historic landscape area on the Register;

followed by,

(c) an evaluation of the relative importance of the Historic Character Area(s) concerned in the national context.

Stage 4 should then be completed with a determination of the average, overall value of all the Historic Character Areas (or part(s) thereof) affected.

Which evaluation steps have to be done and how much input is required will depend on the scale of the development in relation to the nature and extent of the affected Historic Character Area(s) and the historic landscape area on the Register. For example, if a development directly affects an entire Historic Character Area, then only evaluation steps (b) and (c) need to be done. The complexity of the Historic Character Area(s) in terms of the variety of characteristics and numbers of elements affected will also influence the amount of input required.

In cases where both steps (a) and (b) have to be done, evaluating relative importance is necessary because it may well be that the relative importance of an element within the Historic Character Area differs from its relative importance within the overall historic landscape area on the Register. For example, a particular element could be abundant and fairly representative of the Historic Character Area as a whole, but might be quite rare in relation to the whole of the historic landscape area on the Register. Clearly, if an entire Historic Character Area is directly affected with the complete loss of all its constituent elements, then step (a) would not apply.

It is likely that evaluation scores (see 'Guidance on Evaluation' below) could be influenced by a number of factors. The relative size and number of Historic Character Areas within the historic landscape area on the Register, and the number of Historic Character Areas affected in relation to the total number of Historic Character Areas within the historic landscape area on the Register, could all have some bearing on the values determined.

Where the historic landscape area on the Register is very large and diverse, it may be difficult to reach an accurate assessment of value without undertaking extra work that may be beyond the scope of an ASIDOHL2. Under these circumstances, evaluation might be made simpler and easier by 'breaking up' particularly large historic landscape areas on the Register into a number of smaller areas comprising groups of Historic Character Areas. These smaller areas could be identified on the basis of the Register's selection criteria, topographical units or particular land use themes etc. Conversely, where a group of small, tightly drawn Historic Character Areas occurs as, for example, in an industrial or urban area, then for evaluation purposes, the group can be considered as a single Historic Character Area. Whatever means is chosen for the particular case concerned, this should be clearly explained and justified in the ASIDOHL2 report.

With regard to evaluation step (c), 'national context' should be taken to refer to the historic landscape areas on the Register, not the whole of Wales. Although all historic landscapes on the Register are of national importance, being either of outstanding or of special historic interest, some component Historic Character Areas may be of even greater significance, because of the range or the quality of the elements they contain, the presence of designated elements within them, their relationship with other Historic Character Areas, their status as a key component in the historic landscape area on the Register, or because of a combination of these factors. Generally, these Historic Character Areas will be pre-eminent and easily recognized, for example, they might be within a World Heritage Site or they might contain a large well-known monument in state care, Listed Building or Scheduled Ancient Monument and its settings, or a historic park or garden etc.

Evaluation step (c) should not be regarded as downgrading of certain areas: it is simply acknowledging that within a landscape that is all of national importance, some areas, elements or characteristics may well be of greater value than others. It should therefore be possible to determine Historic Character Area value as being somewhere in the range between what might be considered to be the 'baseline' value of the whole historic landscape area on the Register (i.e a value on a par with their nationally important status) and the even higher value of the most significant or pre-eminent Historic Character Area(s) within the same historic landscape area.

Guidance on Evaluation

This section gives a list of criteria that may be applied in evaluation steps (a)–(c), although depending on individual circumstances, not all criteria will be universally applicable (Welsh Office Circular 60/96, *Planning and the Historic Environment: Archaeology*, p. 15, Annex 3, 'Secretary of State's Criteria for Scheduling Ancient Monuments').

However, because some Scheduled Ancient Monument (SAM) criteria are more relevant to sites than to landscapes, not all SAM criteria will be applicable to all the evaluation steps. For the same reason, not all SAM criteria will be applicable to all historic characteristics, or Historic Character Areas affected. As there are no hard and fast rules, it will be a matter of professional judgement as to which criteria to select and to apply. Further advice may be sought from Cadw, CCW and the Welsh Archaeological Trusts.

With respect to the evaluation of individual criteria, in most cases, the different grades of values will have to be qualitative as few, if any, national data sets exist to enable quantitative grades of values to be determined. This will be particularly true for evaluation step (c). There may also be cases where the ranges or the grades of values suggested below will require adjustment to reflect local conditions such as, for example, high numbers of elements present, etc. The ranges or grades of values selected will have to be based on professional judgement and justified in the ASIDOHL2 report.

The SAM-based evaluation criteria set out below are derived from criteria applied in a historic landscape assessment of part of the Gwent Levels landscape of outstanding historic interest (Welsh Office, M4 Relief Road Magor to Castleton — Stage 2 Assessment, Draft Report for Consultation by Ove Arup and Partners, April 1998/Amended October 1998, Appendix 2 — *The Historic Landscape* by S. Rippon), and from work by the Gwynedd Archaeological Trust.

N.B. Depending on which evaluation step is being undertaken, 'elements' include 'characteristics', and 'landscape' includes 'Historic Character Area' in the following list.

Criteria for determining relative importance or value in Stage 4, steps (a), (b) and (c)

Rarity in terms of period or date, and as a component of the landscape. This should be assessed in relation to what survives today, since elements of a once common type of landscape may now be rare.

Very High sole survivor of its type in the landscape;

High only two or three similar historic elements in the

landscape;

Moderate fewer than five broadly similar elements in the

landscape;

Low more than five broadly similar elements

in the landscape;

None commonplace throughout the landscape.

Representativeness should also be considered, in that an example of a landscape that is common can still be of national importance if, in the light of other criteria, it contains a particularly representative range of elements.

Very High contains all the elements that characterize the

landscape;

High contains most of the elements that characterize

the landscape;

Moderate contains about half of the elements that

characterize the landscape;

Low contains some of the elements that characterize

the landscape;

None sole example of the element and, therefore, not

representative.

Documentation The survival of documentation that increases our understanding of a landscape will raise its importance, though this is difficult to quantify owing to the extremely varied nature of documentary material. Therefore, a professional judgment is given based on the actual amount or importance of material and its academic value.

Very High complete documentary record, or exceptionally

important sources available;

High a considerable quantity of relevant material, or

highly important sources available;

Moderate some relevant material, or moderately

important sources available;

Low little relevant material, or only modestly

important sources available;

None no relevant material available.

Group Value relates to the diversity (or similarity) of elements including their structural and functional coherence. To some extent, the group value of individual elements will have been taken into account in Stage 2, where the links between closely related elements as, for example, between the separate features that make up a quarrying or mining site, can enhance the intrinsic or landscape value of an element or characteristic. At Stage 4, the group value relationship is usually wider and more likely to be between whole groups of related elements as, for example, in a quarrying or mining complex that includes the associated settlements, transport systems as well as the processing sites etc. Clearly, there will be instances within Historic Character Areas in which elements or groups are linked to others not directly affected by development, or situated in adjoining Historic Character Areas. 'Group Value' is also likely to be more applicable to areas identified under the Register's first and second selection criteria, namely, 'Intensively developed or extensively remodelled' or 'Period' landscapes.

Very High contains six or more linked elements or groups; High contains four or five linked elements or groups;

Medium contains three or four linked elements or

groups;

Low contains two or three linked elements or

groups;

None i.e. a single or any number of unlinked elements

or groups.

Low

Survival relates to the degree of survival of elements in the landscape. In instances where the original extent or numbers are known (for example, traditional field boundaries for which there may be detailed mapped evidence), it may be possible to measure this quantitatively.

Very Good more than 80% of elements surviving;
Good between 60% and 79% of elements surviving;
Moderate Between 40% and 59% of elements surviving;
Fair Between 20% and 39% of elements surviving;

Poor Under 20% of elements surviving.

Condition relates to the condition of elements in the landscape.

Very Good elements surviving in very good condition for

their class:

Good elements surviving in good or above average

condition for their class;

Moderate elements surviving in moderate or average

condition for their class;

Fair elements surviving in fair or below average

condition for their class;

Poor elements surviving in poor condition for

their class.

Coherence relates to how well the historic meaning and significance of the landscape is articulated by the historic themes, that is the historical processes and patterns that have created the individual elements within it. It may well be that historical processes and patterns have been maintained, or continue, so that the landscape retains much of its original function, thus enhancing its coherence. Clearly discernible or dominant themes can increase the coherence and importance of a landscape.

Very High dominant historic theme(s) present -

landscape retaining its original function;

High dominant historic theme(s) present —

landscape of high articulation, but original

function has ceased;

Moderate historic theme(s) present, - landscape of

moderate articulation;

Low historic theme(s) present, but weak —

landscape of low articulation;

Very Low historic theme(s) suppressed by later changes.

Integrity The importance of a landscape may be enhanced by its integrity that relates to the survival of its original character or form. The resulting visibility and legibility of the landscape's component elements will enhance its amenity value. Greater visibility and legibility generally increase the potential for the historic landscape to be easily understood by the non-specialist.

Very High elements retaining their original character, highly

visible and easily understood;

High elements retaining much of their original

character, visible and fairly easily understood;

Moderate elements retaining some of their original

character, visible, but not easily understood; elements not readily visible and difficult to understand;

Very Low elements hardly visible and very difficult to

understand.

Potential relates to the potential within the landscape for future historic landscape study and analysis.

Very High wide-ranging scope for future historic landscape

study and analysis;

High considerable scope for future historic landscape

study and analysis;

Moderate some scope for future historic landscape study

and analysis;

Low little scope for future historic landscape study

and analysis;

Very Low very little scope for future historic landscape

study and analysis.

Amenity relates to the potential value of elements to be developed as a public educational and recreational amenity.

Very High wide-ranging scope for elements to be

developed as a public educational and

recreational amenity;

High considerable scope for elements to be

developed as a public educational and

recreational amenity;

Moderate some scope for elements to be

developed as a public educational and

recreational amenity;

Low little scope for elements to be developed as a

public educational and recreational amenity;

Very Low very little scope for elements to be

developed as a public educational and

recreational amenity.

Associations A landscape or an area or element within it might have important historic associations with, for example, particular institutions, cultural figures, movements or events etc. Often, however, there are no physical remains, or it may be difficult to tie an association to a particular place, feature or element, with only documentary or oral sources available. Owing to the complex nature of associations, therefore, they are impossible to quantify, so an assessment is made based upon professional judgement.

Very High a highly significant, authentic and nationally

well-known association(s);

High a significant, authentic and regionally well-

known association(s);

Moderate an authentic, but less significant, perhaps locally

well-known association(s);

Low unauthenticated or a little known association(s);

None no known association(s).

The evaluation of steps (a) and (b) should comprise written statements and justifications for the values ascribed to each criterion, followed by a concluding statement for either step (a) or (b). The statement should reflect the general level of values across all criteria, and note any particularly significant 'Highs' or 'Lows'.

The evaluation of step (c) should comprise written statements and justifications for the values ascribed to each criterion, followed by a concluding statement. The statement should reflect the general level of values across all criteria, and note any particularly significant 'High' or 'Low' scores.

Evaluation results for steps (a) and (b) could be summarized in a table, for example:

TABLE 9

ASIDOHL2 STAGE 4: EVALUATION OF THE RELATIVE IMPORTANCE OF THE PART OF HISTORIC CHARACTER AREA X DIRECTLY AND/OR INDIRECTLY AFFECTED BY DEVELOPMENT

VALUE:	V HIGH/ V GOOD		MOD/ MED	LOW	V LOW/ POOR	V HIGH/ V GOOD	HIGH/ GOOD	MOD/ MED	LOW	V LOW/ POOR
in relation to:		OLE OF H	ISTORIC EA					IISTORIC REGISTER		CAPE
CRITERION:										
RARITY	✓						✓			
REPRESENTATIVENESS		✓						✓		
DOCUMENTATION				✓					✓	
GROUP VALUE		✓					✓			
SURVIVAL		✓						1		
CONDITION	✓					✓				
COHERENCE		✓						✓		
INTEGRITY	✓					✓				
POTENTIAL			1					1		
AMENITY		✓						✓		
ASSOCIATIONS				✓					1	

Evaluation results for step (c) could be summarized in a table, for example:

TABLE 10

ASIDOHL2 STAGE 4: EVALUATION OF THE RELATIVE IMPORTANCE IN THE NATIONAL CONTEXT, OF THE HISTORIC CHARACTER AREAS DIRECTLY AND/OR INDIRECTLY AFFECTED BY DEVELOPMENT

VALUE:	V HIGH/	HIGH/	MOD/		V LOW/	V HIGH/	HIGH/	MOD/		V LOW/
	V GOOD	GOOD	MED	LOW	POOR	V GOOD	GOOD	MED	LOW	POOR
										<u> </u>
in relation to:	HISTOR	IC CHAR	ACTER A	AREA X		HISTOR	IC CHAR	RACTER	AREA Y	
CRITERION:										
RARITY	✓						✓			
REPRESENTATIVENESS				✓				✓		
DOCUMENTATION		✓							✓	
GROUP VALUE			1			✓				
SURVIVAL		✓					✓			
CONDITION		✓					✓			
COHERENCE			1				✓			
INTEGRITY			1					1		
POTENTIAL	✓					✓				
AMENITY				✓				1		1
ASSOCIATIONS				✓						

Criteria values in steps (a), (b) and (c) should be scored as follows:

TABLE 11

ASIDOHL2 STAGE 4: EVALUATION SCORES

CRITERION VALUE	SCORE
Very High / Good	5
High / Good	4
Moderate / Medium	3
Low	2
Very Low / Poor	1

In the examples (Tables 9 and 10 above), therefore, the relative importance, at the steps indicated, of Historic Character Areas X and Y would be:

Table 9, Historic Character Area X at step (a) -

(3 x V High @ 5) + (5 x High @ 4) + (1 x Medium @ 3) + (2 x Low @ 2) = 42 out of a possible maximum of 55 (i.e. 11 x V High @ 5)

and at step (b) -

 $(2 \times V \text{ High } @ 5) + (2 \times \text{ High } @ 4) + (5 \times \text{ Medium } @ 3) + (2 \times \text{Low } @ 2) = 37 \text{ on the same scale.}$

Template available at www.cadw.wales.gov.uk

Table 10, Historic Character Area X at step (c), i.e. its value in the national context –

(2 x V High @ 5) + (3 x High @ 4) + (3 x Medium @ 3) + (3 x Low @ 2) = 37 on the same scale;

and for Historic Character Area Y at the same step -

(2 x V High @ 5) + (4 x 4 @ High) + (3 x Medium @ 3) + (1 x Low @ 2) + (1 x V Low / Poor @ 1) = 38 on the same scale.

If ten, rather than the maximum of eleven, criteria had been applied, then the maximum score would have been 50 (i.e. 10 x V High @ 5); and in the case of nine criteria – 45 (i.e. 9 x V High @ 5); eight criteria – 40, and so on.

The final part of Stage 4 is to determine the average, overall value of all the Historic Character Areas (or part(s) thereof) affected.

This is done by combining the scores of steps (a), (b) and (c) together (or just (b) and (c) if (a) has not been applied). However, because of the disparity between score ranges that can result from different numbers of criteria being applied, the scores have to be converted to a scale of 1–100, which in the case of Historic Character Areas X and Y above would be as follows:

Historic Character Area X at step (a): $(42 \div 55) \times 100 = 76.36$ Historic Character Area X at step (b): $(37 \div 55) \times 100 = 67.27$ Historic Character Area X at step (c): $(37 \div 55) \times 100 = 67.27$ Historic Character Area Y at step (c) = $(38 \div 55) \times 100 = 69.09$

The average, overall value of all the areas (and parts thereof), affected in this example, on a scale of 1–100 would, therefore, be:

 $(76.36 + 67.27 + 67.27 + 69.09) \div 4 = 69.99$, rounded off to the nearest whole number, i.e. 70.

In a real case, the total number of areas (and parts thereof) affected could be considerably higher than the four hypothetical areas used in the examples above.

This average, overall value, or combined evaluation figure for Stage 4 would then be graded as follows:

TABLE 12

ASIDOHL2 STAGE 4: GRADES OF OVERALL VALUE

80-100	Very High
60–79	High
40–59	Considerable
20-39	Moderate
5–19	Low
0–4	Very Low

STAGE 5 Assessment of overall significance of impact

Once the direct and indirect impacts of development have been described and, as far as possible, quantified, in Stages 2 and 3, and the relative and the average overall values of the area(s) affected established in Stage 4, the fifth and final stage of the ASIDOHL2 process can be undertaken. This final stage should combine the results of Stages 2 to 4 to produce an assessement of the overall significance of the impact of development and the effect that altering the Historic Character Area(s) concerned has on the whole of the historic landscape area on the Register. This is determined by separately setting out and scoring the value of each of the Historic Character Areas affected in relation to the effect caused by the development and the consequent reduction in value of the historic landscape area on the Register, using the following model:

TABLE 13

ASIDOHL2 STAGE 5: SUMMARY OF THE OVERALL SIGNIFICANCE OF THE IMPACT OF DEVELOPMENT ON LANDSCAPE OF HISTORIC INTEREST 'A'

VALUE OF HISTORIC CHARACTER AREA (based on STAGE 4 results)

IMPACT OF DEVELOPMENT (based on STAGES 2 & 3 results)

REDUCTION OF VALUE OF THE HISTORIC LANDSCAPE AREA ON REGISTER

Very High

Key elements of very high intrinsic importance and/or condition and/or group value, and/or not found elsewhere in this or other historic landscape areas on the Register. SCORE: 9 or 10

High

Key elements of high intrinsic importance and/or condition and/or group value, and/or uncommon elsewhere in this or other historic landscape areas on the Register. SCORE: 7 or 8

Medium

Key elements of varying intrinsic importance and/or condition and/or group value, and /or generally typical of this or other historic landscape areas on the Register. SCORE: 4, 5 or 6

Low

Key elements of low to moderate importance and/or condition and/or group value, and/or of generally low significance in this or other historic landscape areas on the Register. SCORE: 2 or 3

Very Low

Elements untypical of the historic landscape area on the Register and/or changed through modern development. SCORE: 1

Total score for Historic Character Area:

Very High

Critical land loss and consequent fragmentation and/or visual intrusion causing key elements to be removed or so changed that detailed descriptions no longer apply, and/or amenity value is totally lost. SCORE: 9 or 10

Substantial land loss and consequent fragmentation and/or visual intrusion causing key elements to be removed or changed so that group value and /or coherence and/or integrity are significantly diminished, and/or amenity value greatly reduced. SCORE: 7 or 8

Medium

Moderate land loss and consequent fragmentation and/or visual intrusion causing some key elements to be removed or changed so that group value and/or coherence and /or integrity are diminished, and/or amenity value reduced. SCORE: 4, 5 or 6

Low

Slight land loss and consequent fragmentation and/or visual intrusion causing limited numbers of key elements to be removed or changed so that group value and/or coherence and/or integrity are slightly diminished, and/or amenity value slightly reduced. SCORE: 2 or 3

Very Low

Marginal land loss and consequent fragmentation and/or visual intrusion causing negligible changes to elements and their values. SCORE: 1

Very High

Development impact on key elements is such that the overall value of the historic landscape area on the Register is diminished to the point that its future inclusion on the Register may need to be reviewed. SCORE: 9 or 10

Development impact on key elements is such that the overall value of the historic landscape area on the Register is significantly reduced. SCORE: 7 or 8

Medium

Development impact on key elements is such that there is some, but still appreciable, reduction in the overall value of the historic landscape area on the Register. SCORE: 4, 5 or 6

Development impact on key elements is such that there is slight reduction in the overall value of the historic landscape area on the Register. SCORE: 2 or 3

Very Low

Development impact on key elements is such that the value of the historic landscape area on the Register remains essentially unchanged.

Overall significance of impact for Historic Character Area:

In a real case, the Historic Character Areas and their key elements or characteristics should be named, with short statements justifying the values and scores given, based on the key results from Stages 2 to 4. However, the table should neither be too long nor complicated; its purpose is to provide an essential concluding summary and digest of the whole ASIDOHL2 process, as well as setting out the overall significance of impact of development on a landscape area on the Register.

Although scoring has been used extensively in Stages 2, 3 and 4, it is not recommended that the scores from these stages are directly combined or 'converted' to determine the final scores in this table. Rather, this should be a matter of professional interpretation and judgement, based on carefully weighing up all the scores in the preceding Stages, noting averages as well as any significant 'Highs' or 'Lows'.

Excepting errors, it is generally expected that all parties using the results of an ASIDOHL2, including at a Public Inquiry, should be able to agree on the results of Stages 2 to 4, with any latitude for re-interpretation of results confined to Stage 5.

The score for the overall significance of impact of development on the historic landscape area, as calculated for each Historic Character Area listed in Table 13, is graded as follows:

TABLE 14

ASIDOHL2 STAGE 5: OVERALL SIGNIFICANCE OF IMPACT

SCORE	GRADING
26-30	Very Severe
21–25	Severe
16–20	Fairly Severe
10-15	Moderate
4–9	Slight
0–3	Very Slight

The score and grade are entered into the last row in Table 13, p. 29 and the procedure repeated for every Historic Character Area affected. Scores should not be combined and averaged out for all the Historic Character Areas affected, but they should be shown separately, to allow developers, planning authorities or Public Inquiry Inspectors to guide development into those Historic Character Areas where the least reduction in the value of the historic landscape area on the Register is caused.

Mitigation

In Stage 5, ASIDOHL2 sets out to determine the gross (absolute) impact of development on a landscape area on the Register. It is critically important to establish this, as unlike a habitat or other forms of amenity, historic landscapes are a finite and irreplaceable resource. This is not intended to ignore or downgrade the fact that a development can offer mitigation or provide positive benefits that can be weighed up against the gross impact to achieve a lesser net (relative) impact on the historic landscape. Mitigation or positive benefits, advantages, improvements or amelioration that a development claims to offer in terms of conservation work, improving access and increasing opportunities for study, research etc., should be described, qualified and quantified in a separate section at the end of Stage 5. It will then be a matter for the planning authority or Public Inquiry Inspector concerned to determine what weight they should be given.

ASIDOHL2 Concluding Statement

The ASIDOHL2 report should be completed with a concluding statement drawing all the salient points together in a description that qualifies and quantifies the overall significance of impact of development on the historic landscape as accurately and as objectively as possible. This statement should reflect the range of impacts calculated for the individual Historic Character Areas in Table 13, p. 29, as well as a professional judgement as to how much the development would change our capacity to understand and appreciate the landscape's historical meaning and significance, and thereby its overall value in line with the scores in the right hand column of Table 13, p. 29. The statement should also include any other important, or overriding, fact that was not, or could not be, mentioned or accounted for in the ASIDOHL2 process, for example, an extant planning permission for a similar development in an adjacent Historic Character Area.

The Concluding Statement will be a key part of the ASIDOHL2 report, to which most reference will be made, particularly in a Public Inquiry, when it may be part of a Proof of Evidence submitted to the Inquiry. It is essential, therefore, to write the concluding statement in a clear and concise style that can be easily understood by the non-specialist and the Public Inquiry Inspector alike. In complicated cases, or when it aids clarity, a glossary should be compiled to explain in simple language the meaning of the terms and words used in the ASIDOHL2 report to describe historic landscapes. Historic landscape terminology can be academically obscure to the non-specialist, or have an entirely different meaning in a planning context, which can cause unnecessary confusion. Brevity will also be essential with succinct statements summarising the overall results of the assessment.

APPENDIX

List of organizations from whom further information and advice may be sought about this Guide and the Register and the areas it includes:

Countryside Council for Wales

Maes y Ffynnon, Penrhosgarnedd, Bangor Gwynedd LL57 2DW Tel 01248 385500 www.ccw.gov.uk

Cadw

Welsh Assembly Government, Plas Carew, Unit 5/7 Cefn Coed Parc Nantgarw, Cardiff CF15 7QQ Tel 01443 33 6000 www.cadw.wales.gov.uk

Dyfed Archaeological Trust (Cambria Archaeology)

The Shire Hall, Carmarthen Street, Llandeilo Carmarthenshire SA19 6AF Tel 01558 823131 www.acadat.com

Clwyd-Powys Archaeological Trust

7a Church Street, Welshpool Powys SY21 7DL Tel 01938 553670 www.cpat.org.uk

Glamorgan-Gwent Archaeological Trust

Heathfield House, Heathfield Swansea SA1 6EL Tel 01792 655208 www.ggat.org.uk

Gwynedd Archaeological Trust

Craig Beuno, Garth Road, Bangor Gwynedd LL57 2RT Tel 01248 352535 www.heneb.co.uk NODIADAU NOTES